INSTITUTE FOR GOVERNMENT

Inside the red box

How to improve the ministerial submissions system



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About this report

How ministers make decisions matters. But the submissions system – their primary mechanism for doing so – is outdated and dysfunctional. This report digs inside that system, examining its processes, strengths and weaknesses, and how it can be reformed.

Not all of the proposals are new, and indeed some will be familiar to ministers and private office officials. But in discussing both best practice and more creative options, this report sets out how the submissions system can improve and support ministers to make better-informed decisions.

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Introduction

Every day ministers make countless decisions that, in one way or another, affect citizens' lives. But while the decisions themselves are scrutinised in political and public debate, there is less attention on *how* they are made.

This is done primarily through the 'submissions' system – the process of officials submitting written advice to their minister, delivered in their famous red boxes; and ministers making a decision based on it and feeding it back to the department. This simple system, and the architecture that has built up around it, has barely changed for decades. But it continues to play a major role in ministerial working lives and the rhythm of departmental work.

A quarter of the way through the 21st century, it has become outdated, with the increasingly dysfunctional system making it harder for ministers to make well-informed decisions. Now, as a new prime minister renews promises to rewire the state, it must be updated. Civil servants need to improve not just the processes but also the content and format of submissions themselves.

The changes proposed in this report would not replace the submissions system. Written advice to ministers, and a written record of decisions, remain vital. But even simple improvements, and more consistent application of best practice, will make the system better suited to the demands of modern government, and better tailor advice to ministerial preferences and the nature of the decision at hand.*

What are submissions and how do they work?

Submissions** are the main way for ministers to receive information and advice from the civil service, make decisions, and communicate them back to their officials for action. They cover everything from major policy questions to decisions on whether to attend an event or meet a particular stakeholder.

* This paper looks specifically at submissions. There are inevitably decisions made by ministers outside of this formal process – including through informal means like WhatsApp, and in crisis situations – that are outside the scope of this report. For discussion of these topics see our work on WhatsApp in government, rapid policy making, and policy making in a crisis. We will also shortly be publishing a rapid policy making toolkit for civil servants.

** For simplicity, the description of the submissions process and its challenges are written from the perspective of a secretary of state, their private office, and officials preparing submissions for them. The experience of junior ministers is often different. They have fewer officials in their private office, for example, often no dedicated special advisers, and their submissions will typically be stress-tested to a lesser degree. But the core characteristics of the process are the same.

While there is significant variation across departments, individual ministers, and according to the issue, the core format of a submission is broadly consistent. It is a relatively short – usually a few pages – means of requesting a decision from a minister and setting out the information they need to make that decision. Different sections usually include:

- The decision(s) required
- The timeframe it is required in, and why
- Background and context to the issue
- A discussion of various possible approaches or policy options, including factors such as legal risk and financial implications, or whether legislation would be required
- A recommendation
- A brief discussion of connected considerations (possibly with separate advice in other submissions) – for example, communication or parliamentary handling plans.

Submissions often contain lengthy annexes with more detailed information, such as evidence bases and data, but it is generally assumed that ministers will not read annexes in detail or perhaps at all.

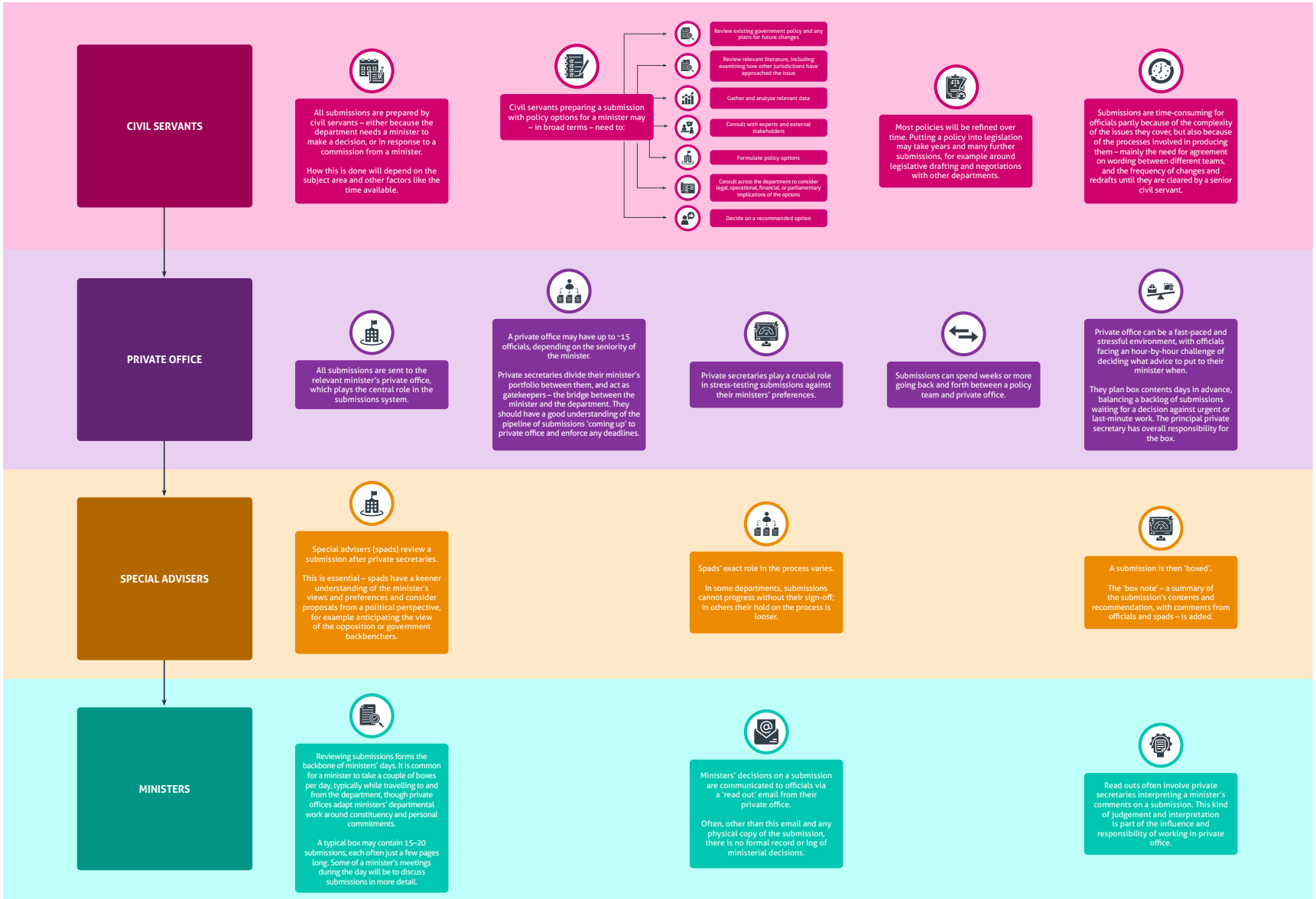
Submissions are the main component of 'box work', the paperwork that ministers process daily, often still delivered to them in a traditional 'red box'. Other box contents can include briefings for meeting preparation, draft speeches for review, diary forward looks, political notes from special advisers (spads), or 'write-rounds'.* So submissions are not the sole means for officials to provide information to their minister. But among all the paperwork, they remain the core decision making mechanism in government.

Submissions can be broadly divided into two types – those 'commissioned' by a minister, and those generated by the department. In the former case, ministers can ask their department for advice or policy options on anything relating to their portfolio. This might generate a single submission, or a particular priority of a minister might become a major workstream for the department, generating several submissions at key points as the work progresses. In most cases, however, the volume of these submissions will be dwarfed by those generated by the department without a minister asking for them or even being aware that they're being prepared. This is because departments' business-as-usual work produces countless decisions that need to be taken by ministers, while officials will also provide ministers with advice and options for responding to urgent or unexpected issues. The balance between business-as-usual and more urgent submissions differs between departments and reflects the type of work they do.

* Write-rounds are a mechanism for government to secure collective agreement on policy. Departments send letters across Whitehall, seeking 'clearance' to proceed with proposals that may impact other departments. Write-rounds will often be accompanied by advice from a minister's own department on how to respond – for example, whether to impose conditions on their approval or seek to block the proposal altogether.

Figure 1 **How the submissions process works**

There are no standardised processes by which submissions are prepared and handled – practice will differ significantly between and within departments. The below represents a generalised and idealised process.



How well do submissions work?

The submissions system, or something like it, is an inevitable part of government, but it is under strain

Decision making will always be based on advice and analysis, and getting this into ministers' hands is the first step to any action. For the foreseeable future, this will mainly be done in written formats, the benefits of which include convenience for ministers and the clarity with which it allows advice to be given. But the current submissions system is under strain.

The processes involved, as well as the typical format and content used, are outdated. And too little thought is given to other means of providing advice or supporting ministers' deliberations. Together, these challenges are making it harder for ministers to make informed decisions.

Box 1 **What do ministers need to make an informed decision?**

The purpose of a submission is to support a minister to make a decision. What that decision is, and how it is reached, is up to the minister. But the civil service has a duty to ensure ministers have what they need to make it in an informed manner.

For the purposes of this report, this should (broadly speaking) include:

- all necessary background information and context – for example, how the issue at hand relates to wider departmental and government objectives
- all reasonable courses of action, with their likely consequences and limitations
- reliable evidence, with any limitations or caveats noted, for the possible courses of action and any recommendations
- a realistic timeframe for the decision; that is, giving the minister enough time to absorb and consider the information.

It is not possible to ensure that all of these conditions are met all of the time. But they represent a basic checklist that officials can use to assess how well they are supporting a minister to make each decision.

The strengths

Many of the advantages of the submissions system are practical. It ensures that there is always a clear record of precisely how a minister was advised, what evidence and justifications they were given, and what they decided. It is essential to have this record. It is (or should be) unambiguous, guarding against differing interpretations of a minister's intent.

The system also allows ministers to revisit previous advice and decisions when making related decisions in the future, and can serve as an accountability mechanism – showing how ministers were advised should their actions be later analysed in inquiries, judicial reviews or other legal cases. This can be important, for example, for decisions where ministers are legally required to consider impact assessments or the public sector equality duty.

Submissions are also convenient. Having information presented in a logical, relatively standardised format makes it easily and quickly digestible, and is particularly useful for minor issues that nevertheless require a ministerial decision.

The process of writing submissions can also improve the quality of advice that ministers receive, as it forces officials to critically evaluate the case they are making. Expressing complex concepts and advice in clear, simple language makes it easier to spot flaws in logic, holes in arguments or gaps in evidence. This process can also be helpful for a department as a whole. Because submissions generally require consensus, teams are expected to collaborate to reach a coherent and mutually agreed written conclusion. Doing so forces a department to consider a range of perspectives and weigh trade-offs.

The weaknesses

The submissions system is not without its weaknesses, however, especially when they are used as the default method for advising a minister.

Ministers receive too many submissions

The demands on ministers' time, particularly that of secretaries of state, are acute. For most, departmental work is in addition to their constituency responsibilities, political activity and parliamentary obligations. They will also, of course, have a private life. This means that working days are exceptionally long, and virtually all ministers, once out of office, say they were permanently exhausted. This alone risks compromising both the quality of their decision making and the attention they can devote to some parts of their portfolios.

While this heavy workload is expected, the volume of 'box work' exacerbates the situation. And the sheer amount of paperwork means that it can be difficult for ministers to properly get their teeth into each submission. Indeed it is common for ministers to rely heavily on the box note summarising each submission, or default to agreeing with the recommendation made by their officials or spads. In this way they risk simply acting as a rubber stamp.

> "[...] there's a tendency in the civil service to fill every minute of your diary during the apparent working day and then give you a box in the evening that's going to take you three or four hours to do. And when I started those boxes would often take me that amount of time. I had huge amounts of correspondence, lots of PQs [parliamentary questions]. I would have 30 different things in a box lots of nights. And particularly when a lot of the subject matter is new, then that takes a significant amount of time to go through." – *Jo Swinson (minister for employment relations, consumer and postal affairs, and women and equalities, 2012–15)*

But often it is not clear that this high volume of paperwork is necessary. Rather than dealing with urgent or high-priority issues, ministers can instead find themselves making decisions on relatively minor issues, diverting their attention from the higher level, strategic thinking and political direction that are better uses of their time.

The volume also has an impact on civil servants and the operation of departments. With innumerable teams across a department regularly sending submissions to a minister, things get gummed up. Most private offices (POs) will have a long backlog of submissions waiting for space in a box, with teams sometimes waiting months for a read-out before they can get on with their work.

There is no single reason why this excessive amount of paperwork has become the norm. For their part, ministers often give in to the temptation to hoard decision making, declining to delegate even minor decisions to junior ministers or civil servants. There are rational reasons for this, primarily the acute sense of accountability they feel – to parliament, the media and the public – for everything their department does. Ministers know the buck stops with them, even if seeing and signing off on everything is impossible given the nature and complexity of modern government.

A further upward pressure on the volume of paperwork is the media grid-driven hunger for regular announcements. This, combined with a generation of politicians cutting their teeth during the frantic, crisis-dominated experiences of Brexit and the pandemic, has normalised rapid policy formation and high-volume decision making.

Yet if ministers' behaviour is one factor in them being overburdened, civil servants also play their part. The corollary of ministers becoming more hesitant to delegate is a loss of confidence among officials. Some interviewees traced this back to 2016, suggesting that the difficulties of EU exit and accusations of obstructionism made civil servants – including those since promoted to senior positions – less willing to make decisions without referring them to a minister. Others point to a weakening of capability in the middle ranks of the civil service resulting from grade inflation, with rapidly promoted officials lacking the confidence and ability to make decisions themselves.

The result has been a growing tendency for officials to default to producing a submission, with all the process and time that involves, either in response to a simple ask from a minister or to request a decision that should have been made at official level. It can also be a reaction to officials' concern that a minister may be unwilling to engage with difficult or inconvenient advice in person.

> "One thing I have noticed over the years is the growing tendency of officials to consult ministers on more and more stuff [...] the tendency to ask about every stage of something. 'Shall we do this tomorrow? Shall we say this to these people?' It slows things down massively. It's very disempowering and, I think, frustrating for ministers because you often want to say, 'Well, sort of, but not quite like that.' It wastes time." – *Lord Frost (Cabinet Office minister, 2021)*

POs and spads should play a key role in controlling the amount of paperwork by filtering out submissions that do not need a minister's attention. But POs can also be overly cautious, defaulting to seeking a ministerial view, and it can be difficult for the relatively junior officials in PO to push back on sometimes significantly more senior officials elsewhere in the department. Spads, meanwhile, can easily be overwhelmed with the volume of material they need to review.

Submissions are too process-heavy

It is not just ministers who spend too much time on submissions. The processes involved mean it can take too long for officials to produce and submit submissions to PO. This causes frustration for ministers, who don't understand why what they saw as a simple ask, or a quick request for further information, can take weeks to turn around. This can make them feel bounced into making a decision and damages their confidence in the department.

> "I felt that the department could agonise for months over a submission."
> *– George Eustice (secretary of state for environment, food and rural affairs, 2020–22)*

Of course it is important that the necessary time and care is taken in producing a submission. But it is often the more bureaucratic elements of the process, rather than work on developing policy, that takes an inordinate amount of time.

Much of this time is taken up with consultation between different teams in a department. *Some* consultation is essential – there is little point in a minister agreeing to a proposal only to discover that it cannot be funded because finance teams were not consulted, or that there is no legislative vehicle for it if the parliamentary team was left out. But too often officials consult too many teams out of an abundance of caution rather than necessity.

That consultation is often chaotic, too, with difficulty identifying the right people to consult, and officials from different teams and of different seniorities editing and commenting on a draft submission at the same time. Those 'holding the pen' may spend hours or days repeatedly redrafting sections following feedback from different parties, and discussion of wording can take more time than the analysis or research itself.

Submissions can spend weeks bouncing between teams and up and down clearance chains, with edits needing agreement from each team or area of the department that has contributed. Amid this, a culture of conflict avoidance can mean that differences of opinion are not properly discussed and resolved. This can result in an unhelpful fudge.

Exacerbating these difficulties is the understandable push from ministers for more digestible advice. While a shorter submission is often a better one, so many interested parties feeding in their views makes this a challenge.

Sign-off is another bottleneck. Submissions often get stuck at the senior civil service (SCS) sign-off stage – perhaps because it is unclear which SCS in which team should lead on it, or simply because they have a backlog of submissions to get through. And this can even waste the time already spent by junior officials if senior civil servants feel the need to rewrite a submission to 'put their stamp on it'.

Ministers are rarely exposed to this process. All they see is how long it takes for their asks to be actioned.

Private office practices can be archaic

PO is still another bottleneck. Each private secretary will typically be overseeing scores of submissions in their portfolio at any time. Often with no centralised system for tracking the progress of submissions, it is left to individual private secretaries to devise their own. Personal Excel trackers or OneNote files proliferate, which may be difficult for others to understand or impossible to access when an individual is away or leaves their role.

Iterating a submission with a policy team presents its own difficulties for private secretaries. This is often done entirely over email, with private secretaries tending to work out of a shared ministerial inbox that receives hundreds or thousands of emails a day, making it easy to lose or miss things. There can be similar problems in processing a submission *within* the PO, through spad clearance and into the minister's box.

And things don't always let up once a decision has been taken by a minister. The lack of any centralised record of ministerial decisions can, in a busy department, make it easy for decisions or steers on minor issues to be forgotten or lost, particularly if the minister does not chase on progress. It can also be difficult to locate the physical submission that a minister reviewed, or even the final electronic copy. Much of this is a result of the constant need for both policy officials and PO to move on to the next submission or the next box.

This disordered system has real consequences. It makes it difficult for POs or ministers themselves to follow up and track progress on decisions, while the lack of an ordered filing system hinders efforts to build departmental institutional memory.

Submission content can miss the mark

While some of the processes leave a lot to be desired, there can also be problems with the content and quality of submissions themselves. Substandard submissions – a regular ministerial complaint – not only provide poor advice, but risk eroding trust between ministers and their officials. Some of the main issues include:

Not answering the question

A common complaint from ministers is that a submission does not address the question they asked.

The 'commissioning' process is a major reason for this. Ministers may request work from their department in all kinds of ways – from a rushed, off-hand comment in a meeting or a WhatsApp message, to a specific ask for analysis on a defined issue. These requests may be triggered by a separate piece of advice, something in the media, or an issue mentioned by a colleague, and can give officials little information to work with. The minister may be looking for a summary of the government or department's policies in the area, a digest of recent statistics, or suggestions for new actions or interventions.

Such asks can become even less clear as they are communicated across the department, as PO, spads and others add their interpretation of the minister's intent. By the time it reaches a policy team, the original ask can be wholly misunderstood or misinterpreted. Once in progress, input from multiple teams and layers of clearance can introduce further reinterpretation of the original ask.

These factors can combine to produce work that bears little resemblance to what the minister originally asked for. Ideally, PO will spot this and work to correct it. But if such work does get to the minister, they will wonder what happened and begin to lose confidence in the department.

Oversimplification

There is always a premium on making a submission as short as possible. Most are only a few pages long, and it is common for ministers to set a two-page rule. Box notes condense the information still further.

This means that a submission necessarily simplifies an issue. In many cases this is a strength of the system – ministers often do not need to be exposed to all the detail, complexities and uncertainties within a given policy question. But there is a balance to be struck between being efficient with page space, giving the minister the broadest, key facts, and omitting key detail or nuance. The difficulty for officials is judging where this line lies.

A related question is how options for action are presented. For only some issues will ministers be faced with a 'yes/no' choice. And even where this is not the case, officials will still aim to present a minister with a limited number of options. This allows the drafters to set the parameters of what a minister can decide, excluding some courses of action before the question even reaches them, and is one reason ministers can become frustrated:

> **"[...] they would usually have what I called multiple choice recommendations: usually there would be three options, two of which would be rather bonkers and you wouldn't do, and then the middle one would be the recommended one that they wanted you to do. But often this was trying to address complex issues."**
> **– *George Eustice***

The challenge for officials is therefore twofold: how to determine which issues are sufficiently high-profile, controversial or of particular interest to the minister to justify departing from a short submission with simple options; and how to do so in a way that is most useful and intelligible.

Prioritising consensus

The submissions system is geared towards presenting ministers with a single departmental opinion – in effect, the collective view and judgment of the department. That is valuable, as having an agreed view ensures that objections cannot be raised at a later stage and should allow a department to negotiate more effectively across Whitehall.[*] It also works for ministers, helping them to make decisions quickly, safe in the knowledge that all relevant teams in the department have agreed that the proposed solutions are workable.

But a consensus view can also represent the lowest common denominator, or simply a fudge, and does not surface different perspectives that a minister may find useful. In some cases, disagreements over how quickly a policy could be rolled out, the likely consequences of alternative approaches, or how different options would impact on other priorities, would be useful for ministers to interrogate and could plausibly change their decision.

[*] While many policy issues affect multiple departments, submissions are prepared almost entirely on a department-by-department basis. This means that they only serve as a means for a minister to receive advice from *their* department, and form *their* department's view of an issue, before entering into negotiations with other departments if necessary. In this way the submissions system inhibits effective cross-government working and breeds departmental protectiveness over their work.

How to improve submissions

There are many ways the submissions system could be improved. Some would reduce the volume of submissions reaching ministers or make their production more efficient; others would help ministers by providing information in different formats. All would support ministers to make better-informed decisions. This section looks at how these improvements, some of which are existing best practice, can be made at each stage of the submissions process.

Make delegations clearer

In any department innumerable decisions are made at every level of responsibility. But there is often a lack of clarity around which decisions should be made at what level – by the secretary of state, other ministers, spads or officials.

There is little formal guidance on this question. In some cases, legislation specifies that certain decisions must be made by the secretary of state or a minister. In others – for example, a change in policy direction, or if the issue is controversial or high-profile – the need for a decision to be taken at ministerial level will be obvious. Some further guidance is provided by the 'Carltona principle',* which established that officials can act on behalf of ministers and make decisions in their name. But ministers can legitimately (even if unwisely) insist on making almost any decision, no matter how minor, for themselves. So in reality, officials are constantly making judgment calls and referring to precedent around what ministers (or spads) should be made aware of or decide on.

This lack of clarity is one reason for unnecessarily high volumes of ministerial paperwork. With no clear guidance, risk aversion and the lack of confidence discussed in the previous chapter lead officials to put even minor decisions to ministers. Ministers themselves, exposed to more of the department's work, feel the urge to hoard decisions. The volume of paperwork reaching ministers continues to grow.

Ministers and officials can tackle this by establishing clear delegation frameworks. This should happen when portfolios are allocated to new ministers and be confirmed in one of the first conversations new ministers have with their officials. Frameworks should outline, for each policy area, what broad types of decision must be made by the secretary of state, and what is delegated to other ministers, spads or officials. This should also set out clearance processes for routine departmental work like parliamentary questions, correspondence and write-rounds.

* The principle derives from a 1943 legal case in which the Court of Appeal recognised that, in the words of the Cabinet Manual, "ministers' functions are normally exercised under the authority of the minister by responsible officials of the department", and that "public business could not be carried on if that were not so".

It will not be possible for any agreed set of delegations to cover every eventuality. But agreeing a broad framework and acknowledging the trade-offs it involves would help. Such a framework, combined with clear direction from ministers as to their priorities and objectives, would ultimately reduce the amount of paperwork reaching their desks.

Improve commissioning

Ministers and their POs should attach far greater importance to clear, articulate commissioning. Private secretaries should discuss complex commissions further with their minister, ideally together with the relevant policy team. This will help to clearly establish *why* the minister has asked for the advice and what specifically they are asking for – questions that, at present, often get lost, causing frustration when submissions do not match ministerial expectations. Ministers themselves will likely find such discussions helpful, allowing them to consider more carefully what they would find useful on the subject.

Private office should also use mechanisms to keep more important submissions on track in the early stages. This could involve private secretaries and spads reviewing skeletons of submissions and initial ideas for policy interventions, providing an opportunity to flag any issues. For the most critical submissions – as already happens in many cases – POs should formalise the process, agreeing timelines and check-in points.

Consider alternatives to a submission

A better understanding of what a minister wants also helps to establish when a submission is *not* necessary, and another option would work better. Ministers and officials should have a shared understanding of those options. This would help not just during the commissioning process, but also when officials are considering how to present information that a minister has not requested but still needs to see.

One such option is simply giving brief verbal advice, which can often save a lot of paperwork. But there are also options for when written information is needed but a submission isn't necessary. These include:

- A brief, 'for information' note
- A summary of key statistics in a specific area
- Short updates (1–2 paragraphs), possibly including a simple decision to make with a yes/no answer.

The last of these can be a particularly useful way to transact minor decisions with ministers, or for officials to cover off an issue that might only just pass the bar for needing to inform them. Philip Hammond, for example, used them while chancellor:

> **"I switched the Treasury [...] to what they call 'paragraphs', where twice a day I get an update of relatively minor things. Things I need to know about, but which can be summarised in a paragraph. So, they give me two or three pages of single paragraph advice on things. Whereas when I started, the stuff was coming in as full papers on everything, and it was just impossible to manage."**[1]

Normalising this kind of shorter, quicker communication requires officials to tackle both risk aversion – which often leads to overly long, detailed submissions – and a tendency to default towards formality in communicating with ministers. For their part, ministers will need to actively encourage officials to use such options, and be comfortable with receiving less detailed information on some issues.

Shake up the research and drafting stages

The next stage of the process – research and drafting – can also be radically improved, particularly through wider use of AI.

Use of artificial intelligence

Developments in AI offer a real opportunity to shake up the process of compiling a submission. Several of the bespoke tools built by the government's Incubator for Artificial Intelligence (i.AI), for example, could and should be widely used in the research and preparation phases:

- 'Parlex'[2] uses *Hansard* data to judge likely parliamentary sentiment towards different policy options, which could assist officials developing parliamentary handling plans.

- 'Consult' analyses responses to government consultations: i.AI says that Consult completes in hours analysis that would take officials months, to at least the same standard.[*,3]

- 'Hawkeye'[4] is already widely used in the Treasury, automating economic data collection and generating briefings with data summaries.

Beyond these specific tasks, AI tools should be commonly used for analysing data and summarising publicly available information on policy issues. This would take most of the time investment out of literature reviews, for example. Policy makers should also use AI to generate, test and iterate policy ideas in the early research stages of producing a submission.

* This includes categorising responses into themes and presenting interactive dashboards of the results, which would speed up the process of summarising public responses to policy options for ministers.

Used well, this should allow officials to challenge their own assumptions and identify new or more imaginative policy options. Models using 'retrieval augmented generation' (RAG) – drawing on access to a department's internal files as well as the internet – could be particularly impactful, helping to circumvent the common challenge of poor institutional memory by summarising existing knowledge on an issue, or evaluations of previous interventions. AI tools with access to departmental data could also model the impact of new policy options.

Beyond these research and analysis tasks, AI should be more widely used during the drafting process. There is already evidence of its utility here. A 2024 cross-government trial of Microsoft's Copilot, for example, showed that for most civil service grades the tool was most effective at saving time in drafting documents.[5] Trials in individual departments have had similar results. A Copilot evaluation in the former Department for Business and Trade reported 72% satisfaction, with the most significant time savings reported for using it to draft written reports or briefings.[6] A similar trial in the Department for Work and Pensions found 73% of users reporting improved written outputs with Copilot, with "many users [feeling it] improved clarity and tone".[7]

The technology should also play a role at the final stage of the process – reviewing full submissions and suggesting improvements. While commercially available tools are adept at critiquing documents in general, there is already an example of a bespoke government tool designed to improve submissions specifically. 'DBT Assist', designed for government tasks for which "generic AI" doesn't well work enough,[8] was built with a specific 'submissions checker' function. This "challenges the clarity of argument and evidence bases" and "avoids documents being returned for corrections".[9] Used well, this could help at various phases of the submissions process, such as SCS and spad review, which often cause delays. It would be particularly valuable if the tool could be trained on documents written in the minister's preferred style, or which spads have commented on or edited before.

If departments fully integrated such AI use cases into the submissions process, the benefits would go beyond just improving the quality of submissions. As the Institute has previously noted, a major further benefit is the amount of officials' time it would free up – time they could spend acquiring more subject matter expertise, and particularly the kind of "hyper-specific or real-time insider insights which LLMs struggle to capture".[10] For this reason, senior officials will need to ensure that faster turnaround times for submissions do not simply lead to more of them – but that officials instead use their saved time in more productive ways.

Limitations to AI

While the potential benefits of wider AI use are significant, it must still be used with caution. For example, although the evidence above demonstrates its utility for drafting documents in government *in general*, the risk of errors and hallucinations is real. As the government's own guidance on AI use warns: "Fundamentally, generative AI models cannot be trusted to produce factual content."[11]

There are concerns beyond those of factual accuracy. There is, for example, a risk of AI models embedding erroneous assumptions, values or beliefs that they have absorbed and may be difficult to unpick.[12] Anecdotal evidence also suggests that AI-generated recommendations can be insufficiently strategic, or lack imagination and creativity, showing the tendency for LLMs to simply repeat information they have access to. And in many cases, they will simply not be able to provide the information required. AI cannot understand the views of other government departments; private stakeholder sentiment or the 'on the ground' reality of a policy challenge; connections between the matter at hand and other policies the government is considering or implementing; or the likelihood of securing parliamentary time for legislative change.

It is also not clear that, in areas where AI could hold more promise, government systems are good enough for it to do so. A model's ability to analyse large quantities of government data, for example, would be hamstrung by the often poor quality of such data.[13] i.AI emphasises that AI systems rely on "high-quality, well-structured and accessible data", but notes that "many government datasets were created for operational or compliance purposes rather than AI".[14] For as long as such data is poorly structured, stored in legacy IT systems,[15] or dispersed between different systems and owners, a significant opportunity to provide ministers with new insights to improve decision making will be missed.

The same is true for RAG-enabled AI drawing on a department's institutional memory. Government documentation is often stored and organised just as poorly as data. Lord Maude highlighted this problem in 2023, referring to "patchy and incomplete" paper trails for decisions, and noting that "the lack of easy access to this information – coupled with the churn of policy officials – means that knowledge of what has been tried, what has worked, and what has failed is lost; in short, the institutional memory is impaired."[*,16] Both the absence of such documents and the risk of submissions being informed by irrelevant files – half-finished slide packs or notes of a team meeting – currently present significant obstacles to the effective deployment of AI to harness institutional memory in submissions.

For these reasons, in the immediate term, AI will be best used to challenge officials' thinking, produce rough first drafts, improve documents' structure and presentation, and critique the end product. It will always be necessary for officials to assess, fact-check and add nuance to AI output. They must retain subject matter expertise and the skill of thinking creatively in developing recommendations. And critically, they must remain accountable for the final product.

Test, learn – and train

Despite these challenges, and particularly as AI capabilities improve, civil servants have a responsibility to keep testing tools and identifying use cases for them in the submissions process. Ministers should actively encourage them to do so and seek assurance that their department is continually exploring new possibilities.

* Maude also noted that "even ministerial submissions are apparently often kept in a disorderly fashion on email systems, some of which are set to expire with time periods of the order of months".

Providing officials with appropriate training in AI use will be essential, and was highlighted in each of the trials discussed above. This is particularly important given anecdotal and survey evidence that AI usage across the civil service is lower than might be expected. The Civil Service People Survey, for example, showed that in late 2025 just 26% of officials thought they had saved at least one hour per week through AI use. While that figure is higher in some departments (57% in the former DSIT and 54% in the former DBT), it is significantly lower than the 71% of officials who think it is 'somewhat' or 'very likely' that AI will change how they do their job in the next five years.

There is also anecdotal evidence of nervousness and confusion around feeding government information into AI tools, including a lack of understanding that 'official sensitive' information can be safely inputted into Copilot (with enterprise data protection enabled) and i.AI tools.

This shows that a significantly improved training offer is needed if officials are to feel more confident in using AI and to use it more effectively. While there are some government resources available, including i.AI's 'how to' guides[17] and 'prompt library',[18] there will need to be a step-change if the potential of AI tools in the submissions process is to be realised.

Consensus is not always the answer

Changes to how submissions are structured and presented can also improve their quality. Ministers are not, for example, always well served by a submission presenting a consensus departmental view, and officials should consider when their advice would be improved by exposing ministers to internal disagreement. This is unlikely to be the case for routine matters on which ministers don't want to invest much time. But for major policies, which may set the direction of the department for years to come, there is value in a minister being privy to internal disagreements about the most effective course of action.

This would require a very different type of submission – perhaps one where, after contextual and background information, most of the document consists of different groups of officials making cases for different courses of action with different evidence and analysis. This could lead to officials debating the merits of their cases in front of the minister.

This would need to be carefully managed. Civil service culture steers officials very strongly towards achieving consensus, with surfacing disagreement seen as something of a hostile act. Suggesting that officials could do so more often could risk departments losing the discipline and rigour that goes into reaching consensus, leading to ministers receiving unnecessarily complex advice more often. A further consideration would be the level at which disagreement would enrich a debate. A minister may be enlightened by debate between two directors general; disagreement between two members of the same policy team is less likely to be productive.

How this different approach is presented to ministers would also be important. Some may see it as an attempt to skirt the difficult work required to reach an agreed view. But it should nevertheless be an option, used sparingly in cases where it could support ministers' decision making.

Streamline processes

Beyond the research and drafting stages, officials also spend too much time navigating internal processes – around consulting other teams, clearance and final sign-off. This wastes time and frustrates ministers when advice takes too long to reach them.

To reduce the amount of time spent gathering views and input from across the department, the list of teams – and preferably specific individuals – to be consulted on any submission should be drawn as narrowly as possible, and decided at the outset of the process by a single senior official. This naturally involves risks – of an important team not being consulted, for example, or of working in silos within the department. Ultimately this will require a suitably experienced senior official to make a call and own that risk, balancing it against delivering work more efficiently.

The sign-off process should also be streamlined and seek to avoid SCS bottlenecks. In most cases it is more junior officials who have done most of the work on a submission and know the subject best. Senior officials should trust and empower such officials to author advice and submit it to PO, limiting their involvement in the process as much as possible. Again there are challenges here – senior officials naturally feel a responsibility to quality-check submissions and are accountable for their content. Given the sense of status that comes with being valued and trusted by ministers, they also have an incentive to put their own stamp on submissions. But they should recognise when their input genuinely adds value rather than causes delays. And empowering juniors and overseeing a team known for providing advice efficiently should be recognised as valuable leadership qualities.

Both empowering junior officials and restricting consultation would also help with another common challenge with submissions – poor readability resulting from multiple authors. As far as possible, a single person should 'hold the pen' on a submission.

Of course many officials *do* already make significant efforts to minimise delays resulting from unnecessary process. But a big culture shift will require changing the incentives that senior officials making the key decisions are acting under. They should be recognised and rewarded for progressing submissions smoothly and efficiently, whether that is through placing more trust in juniors, or restricting consultation only to what is necessary.

Modernise private office systems and practices

An improved submissions system also requires changes to the final stage of the process – the handling of submissions in PO. One way to address challenges here is simply to reduce the volume of submissions. But PO as a profession is also long overdue a significant shake up of its practices.

There are some positive recent examples of offices experimenting with new approaches. A key example is in the Ministry of Justice, where a web app – 'Ruby' – was developed by an individual in the former deputy prime minister's office as a shared workflow management mechanism.[19] All submissions are securely stored in the app or linked to SharePoint giving officials and spads full, live visibility of the status of submissions and other work across the secretary of state's portfolio.

This allows private secretaries to view the status of all submissions and assign them to spads for review. Spads, logging in separately, use the app to both leave comments and approve submissions to be boxed. The app's use of RAG to collate previous related submissions and ability to track read-outs bring it closer to operating as an AI-assisted platform for POs.

This kind of system is a departure from how POs have worked for many years and could markedly improve the functioning of an office. It can also support offices to improve processes in the future, providing performance metrics such as the length of time submissions spend at different stages of the process, helping to identify bottlenecks.

In recent months Ruby has been developed from a prototype into a properly engineered platform – maintained by the MoJ's Justice AI Unit – and is being piloted across multiple departments, with the possibility of it becoming a shared service for all POs in Whitehall with support from the the newly established Gov AI Unit in the Office of the Prime Minister and Cabinet (OPMC). Officials should continue to explore options to expand the platform; for example, using it to generate and track commissions.

The question raised by the Ruby case is what the role of the Cabinet Office or GDS should be in making innovations of this kind available across government. It is unrealistic to expect GDS to proactively spot challenges like those in POs and develop tools to address them; the range of government processes ripe for improvement is enormous. It should, however, be open to pitches for improvements from officials and – as it has done with Ruby – be ready to pick up innovations and rapidly build them into government-wide tools.

Supplement submissions

This chapter has discussed how to reduce the number of submissions, and how the documents themselves and the process for producing them can be improved.

But at present, officials can default too readily to providing written advice in isolation. This section looks at some other ways officials can deliver advice, alongside submissions.

In-person discussion

Discussing a complex issue in person can help ministers to delve deeper into particular areas, understand nuance that couldn't be articulated within a few pages, or benefit from better data visualisation through a presentation. They may form a better understanding of why some options were presented in a submission and others weren't, possibly leading them to choose a course of action that wasn't proposed, or some combination of those that were. While this appears obvious, it can be valuable

for officials to proactively propose a discussion as a follow-up to a submission, rather than – as is sometimes the case – waiting for the minister to request one.

Some ministers set specific rules for when issues should be discussed in person. Philip Hammond, for example, told the Institute that he opted for in-person discussions for subjects too complex for a short submission:

> **"The other thing I did was have a three-sides rule for submissions. If you can't get it on three sides, then you have to come and present instead."**

Bringing ministers and officials together in a room can also be a useful way of taking several simple decisions quickly. Defra, for example, used an 'SI room' after the UK left the EU, in which the secretary of state and officials met regularly to decide whether to adopt scores of statutory instruments (SIs), each of which would otherwise have had its own submission.

Ministers should feel empowered as to how they use such discussions, and their PO should help them understand the options available. They may, for example, want to bring in officials with opposing perspectives, given the over-reliance on consensus described above. Or they may want to extend such discussions beyond civil servants – perhaps inviting external experts or other stakeholders into internal departmental discussions.

Discussing issues in person has drawbacks. Meetings often become too large to be effective – a result of teams across a department wanting to represent their view or protect their interests. Officials are also often far more comfortable with writing advice than providing it orally (particularly in front of their colleagues), and a large meeting can make it difficult for them to present complex or inconvenient information. In a wide-ranging discussion it is easy for the nuances of legal advice, for example, to get lost or be misunderstood.

Such discussions also allow ministers to choose who they hear from. They might want to discuss an issue with senior representation from across the department, for example, or a small number of officials and spads, or junior officials who are closest to the detail. In some cases a brief call with a single official might be sufficient to clarify a minister's understanding of an issue.

But this also risks important voices or perspectives not being represented, whether deliberately or not. The Covid inquiry, for example, noted the detrimental impact that a lack of diverse perspectives in key decision making fora had on government action during the pandemic.[20] Interviewees for this report also suggested that analysts (those conducting data analysis and compiling and reviewing evidence bases) in particular can find themselves left out of meetings in favour of policy and communications officials.

Officials need to safeguard against this. They should advise ministers on whom they should hear from before making a decision and push back if necessary. But ministers will have the final say – making more decisions in person will be a trade-off between more open and productive dialogue, and the risk of shutting out important perspectives.

It is also important that in-person discussion should supplement, not replace, written advice. This is vital to ensure that considerations such as legal advice are always presented to ministers in some form.

Better use of data

Ministerial decision making is often hampered by limited use of data and technology. The pandemic is a recent case of this. The Covid inquiry* provided a telling example, of a dashboard used to present cross-departmental data. The inquiry noted that the dashboard, which later became "a more sophisticated interactive digital tool [...] the single source of truth on data for [prime minister] meetings", was not possible at the start of 2020 – because the Cabinet Office "lacked sufficient capability at the outset of the pandemic to launch a sophisticated data presentation tool".**,[21]

The irony is that government departments hold vast amounts of data. Most ministers receive a constant stream of it, including within submissions and as part of regular updates on their priority issues. But the way data is presented in traditional submissions does not help ministers interpret it or draw conclusions. Data presented in documents is necessarily static – a minister is limited in their understanding by the choices the author has made. They cannot see how a variable has changed over different time periods, or how it compares or relates to other metrics. Data that leads a reader towards one conclusion may point in a very different direction when presented a different way.

This challenge can be partially overcome by officials discussing data with the minister in person. But a better approach would be supporting ministers to explore the data themselves, or together with officials – including through interactive data dashboards. Taking the challenge of reducing the prison population as an example, it should be possible for a minister to view: how the prison population has changed, over any timescale they choose; how the population breaks down by type of prisoner (including personal characteristics and type of sentence) as well as by category of prison; and the projected impact of different interventions. A traditional paper-based submission cannot do this, or at least not in a way that is as accessible and understandable.

* The Covid inquiry website also serves as an invaluable source of publicly available copies of ministerial submissions – likely the only place such documents relating to still-recent events are available.

** The Treasury provides a similar example. "Economy Dashboard" meetings, designed to "systematise the economic briefing for the Prime Minister" (according to the witness statement to the Covid inquiry from Stuart Glassborow), provided the prime minister, chancellor and other cabinet ministers with a common information picture on various economic indicators during the pandemic. But these were only introduced in June 2020, and even then, the context of the inquiry report and the relevant witness statement make clear that the dashboard was considered something of an innovation.

AI-supported decision making

A further means to supplement the paper-based system is to embed AI into ministers' decision making process.

A simple version of this could mean giving ministers access to i.AI's 'Consult' tool – allowing them to see the dashboards summarising consultation responses, delve into detail that the submission summarising the consultation didn't go into, or view anonymised individual responses.

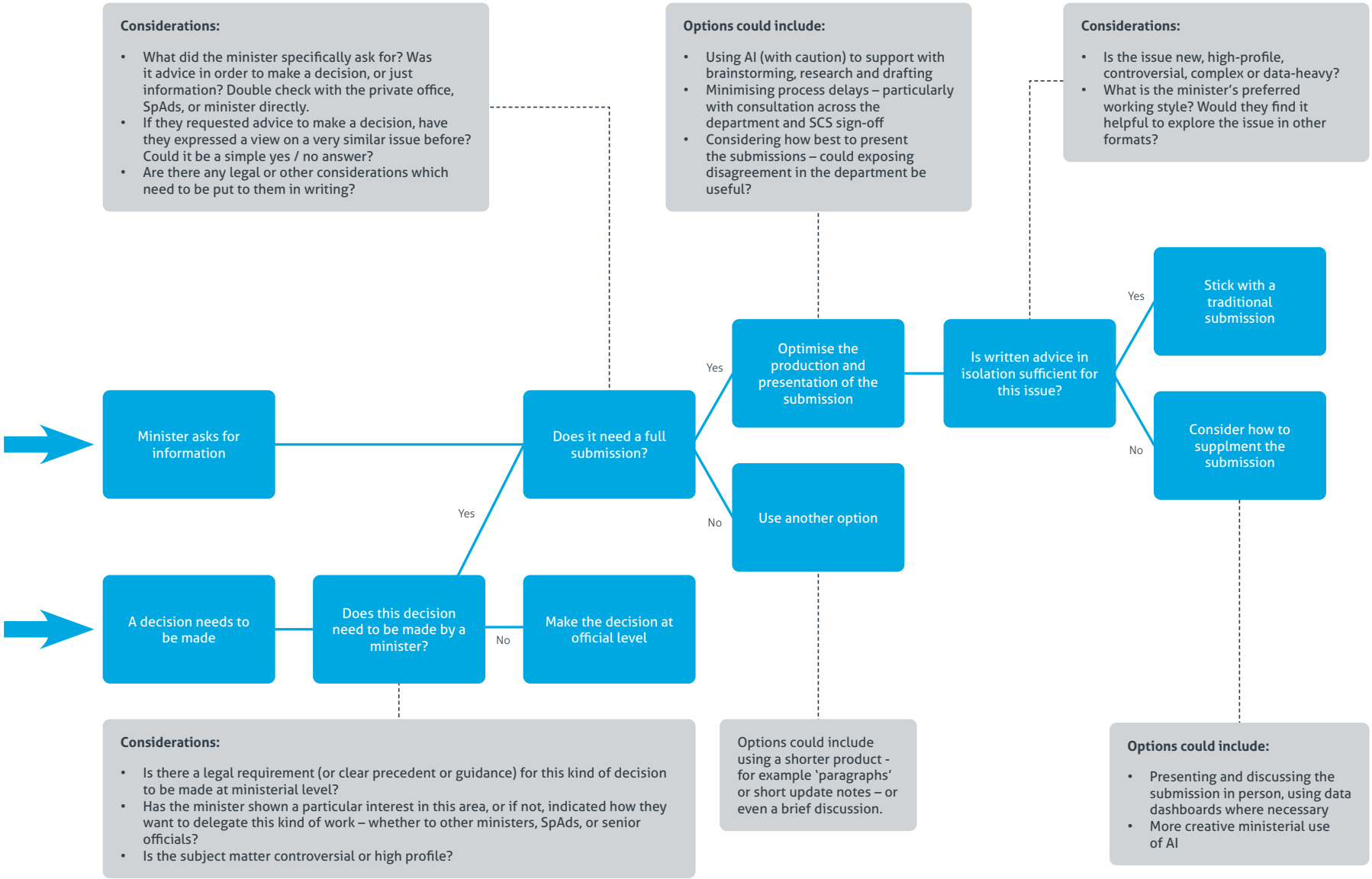
Direct ministerial use of chatbots and other AI tools would present a more radical departure from current practice. RAG-enabled tools* could prove particularly valuable for ministers, providing them with further information on an issue rather than requesting additional information from officials, which could take days or weeks. There have already been examples of ministers using AI in similar ways,[22] though with publicly available tools rather than internal government ones with access to departmental information.

Taken a step further, ministers and officials could use sufficiently advanced tools, with full access to departmental files, to stress-test, iterate and model policy ideas, challenging their assumptions and identifying options not previously considered. Such methods are contrary to the default way of working in the civil service, where officials present ministers with fully formed policy options. The use of more experimental methods would not be suitable for all situations, but could add value to early-stage conversations about possible policy interventions.

There would be risks in such approaches, most importantly the risk of ministers and officials receiving incorrect or partial information. For that reason, for the foreseeable future, any ministerial use of LLMs in the policy making process should be at most a carefully used supplement to the existing submissions system.

* A challenge of using AI with RAG abilities would be how to reconcile it with the convention barring ministers from accessing the papers of previous administrations.

Figure 2 **How to improve submissions**



Conclusion

The traditional submissions system needs shaking up.

Significant benefits would flow just from improving the basics – including establishing clear delegations, better consideration of whether a submission is genuinely necessary, more coherent commissioning and sorting out workflows in private office. But it is also vital to move beyond the traditional confines of a submission, considering how other formats might supplement written advice and be better suited to either a minister's working style or the issue at hand.

Creative but cautious use of AI will also play a part. There is scope to use the technology during the research and drafting stages for submissions, as well as to support policy discussions later in the process. But officials must be aware of the risks, and review, edit and add nuance to AI outputs. Wider AI use must also ensure that officials retain both policy making skills and subject matter expertise, and remain fully accountable for the advice they provide.

Some of the proposals in this report require changes not just of process but of behaviour. Ministers, for their part, should be more willing to delegate and be open to creative ways of considering policy issues. Civil servants, meanwhile, need the confidence to present such options to ministers, and must tackle cultural norms and incentives that underlie some of the issues described in this report. Senior officials should allow junior colleagues more agency over what is submitted to ministers, for example, and become more comfortable with disagreeing with their colleagues in front of ministers.

It is too easy, particularly in a busy department or private office, for ministers and officials to default to status quo methods. They must resist the urge to do so. Embracing alternatives would bring real benefits for the efficacy of the submissions process, and for ministerial decision making as a whole.

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