

Australian Government Advertising: November 2021 to November 2024

[Across Entities](#)

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Canberra ACT
31 March 2025

Dear President
Dear Mr Speaker

In accordance with the authority contained in the *Auditor-General Act 1997*, I have undertaken an independent performance audit across entities. The report is titled *Australian Government Advertising: November 2021 to November 2024*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit to the Parliament.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's website — <http://www.anao.gov.au>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Caralee'.

Dr Caralee McLiesh PSM
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

The Auditor-General is head of the Australian National Audit Office (ANAO). The ANAO assists the Auditor-General to carry out their duties under the *Auditor-General Act 1997* to undertake performance audits, financial statement audits and assurance reviews of Commonwealth public sector bodies and to provide independent reports and advice for the Parliament, the Australian Government and the community. The aim is to improve Commonwealth public sector administration and accountability.

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Audit snapshot

Auditor-General Report No.29 2024–25

Australian Government Advertising: November 2021 to November 2024



Why did we do this audit?

- ▶ The objective of the audit was to assess the effectiveness of the Department of Finance's (Finance) and selected entities' implementation of the Australian Government's campaign advertising framework (the framework). The audit continues the ANAO's coverage of the framework, to provide Parliament with: information on its development; campaign expenditure over time; and assurance as to whether entities have effectively implemented the framework and complied with the applicable requirements of the Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities (the Guidelines).
- ▶ The ANAO reviewed the Attorney-General's Department's (AGD) One Talk at a Time campaign; the Australian Electoral Commission's (AEC) Your Answer Matters campaign and the Department of Health and Aged Care's (Health) Youth Vaping Education (phase one) campaign.



What did we find?

- ▶ Finance is effective in its whole-of-government administration of the framework.
- ▶ AGD and Health were largely compliant with the framework.
- ▶ The AEC has largely complied with its internal requirements and the intent of the framework.



What did we recommend?

- ▶ There were two recommendations to Finance aimed at development of policy and guidance to manage emerging risks including brand safety relating to the use of artificial intelligence and emerging technologies in advertising and improving procurement practices. There was one recommendation to the AEC aimed at improving its internal arrangements for campaign development and approval.
- ▶ Finance and the AEC agreed to the recommendations.



Key facts

- ▶ The Guidelines were reviewed in 2022.
- ▶ The AEC has an exemption from most elements of the framework. This was most recently approved by the Minister for Finance in October 2022.

\$57.6 m

was the value of the campaigns examined in this audit (GST exclusive).

\$769.1 m

was the expenditure on Australian Government advertising between July 2021 and June 2024.

1

campaign was exempted from the Guidelines between November 2021 and November 2024 (in addition to the AEC's general exemption).

Summary and recommendations

Background

1. The Australian Government's campaign advertising framework (the framework) applies to non-corporate Commonwealth entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).¹ The overarching aim of the framework, introduced in 2008, is to provide the Parliament and the community with confidence that public funds are used to meet the genuine information needs of the community.²

2. The government periodically issues guidance for entities undertaking information and advertising campaigns. The most recent version of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (the Guidelines) was released in December 2022 (2022 Guidelines)³, replacing the October 2020 Guidelines (2020 Guidelines). The Guidelines are administered by the Department of Finance (Finance) and state that they:

operate on the underpinning premise that:

- a. members of the public have equal rights to access comprehensive information about government policies, programs and services which affect their entitlements, rights and obligations; and
- b. governments may legitimately use public funds to explain government policies, programs or services, to inform members of the public of their obligations, rights and entitlements, to encourage informed consideration of issues or to change behaviour.⁴

1 At 1 August 2024, there were 101 non-corporate Commonwealth entities out of a total of 191 Commonwealth entities and companies. See Department of Finance, *Flipchart of PGPA Act Commonwealth entities and companies*, Finance, Canberra, 2024, available from <https://www.finance.gov.au/sites/default/files/2024-07/Flipchart%201%20August%202024%20-%20FINAL.pdf> [accessed 1 September 2024].

Non-corporate Commonwealth entities are legally and financially part of the Commonwealth of Australia. Conversely, corporate Commonwealth entities and Commonwealth companies are body corporates with separate legal personalities from the Commonwealth. The Australian Electoral Commission (AEC), a non-corporate Commonwealth entity, has had an exemption from most aspects of the framework since 2009. The AEC's exemption is discussed in paragraphs 4.2–4.4.

2 The development and purpose of the framework, introduced in 2008, were reviewed in Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*, ANAO, Canberra, 2019, paragraphs 1–4 and paragraphs 1.2–1.9, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019> [accessed 20 August 2024].

3 Department of Finance, *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2022 Guidelines), Finance, December 2022, available <https://www.finance.gov.au/sites/default/files/2022-12/Australian-Government-Guidelines-on-Information-Advertising-Campaigns-by-non-corporate-Commonwealth-entities.pdf> [accessed 20 August 2024].

4 *ibid.*, paragraph 4.

3. The Guidelines apply to all information and advertising campaigns⁵ undertaken in Australia by non-corporate Commonwealth entities.⁶ Entities subject to them:

must be able to demonstrate compliance with the five overarching principles when planning, developing and implementing publicly-funded information and advertising campaigns. The principles require that campaigns are:

- relevant to government responsibilities
- presented in an objective, fair and accessible manner
- objective and not directed at promoting party political interests
- justified and undertaken in an efficient, effective and relevant manner, and
- compliant with legal requirements and procurement policies and procedures⁷

Rationale for undertaking the audit

4. This audit is part of an ongoing program of performance audits on Australian Government advertising. The rationale for undertaking this audit is to provide the Parliament with information on key developments in the framework since the period covered by the 2022 ANAO audit⁸, when the ANAO last reported on its operation.

5. The audit provides independent assurance on whole-of-government administration of the framework by the Department of Finance and selected entities' compliance with the Guidelines and the wider framework requirements.

Audit objective and criteria

6. The objective of the audit was to assess the effectiveness of the Department of Finance's and selected entities' implementation of the Australian Government's campaign advertising framework.

7. To form a conclusion against this objective, the following high-level criteria were adopted:

- Does the Department of Finance effectively administer the Australian Government's campaign advertising framework?
- Were selected campaigns compliant with the Australian Government's campaign advertising framework?

5 Paragraph 5 of the 2022 Guidelines states that:

An advertising campaign includes paid media placement and an information campaign does not. Information campaigns typically involve a mix of public relations or below the line activities, but do not include a paid advertising component.

6 Finance, 2022 Guidelines, paragraph 7.

As discussed in Box 1, the Minister for Finance can exempt campaigns from complying with the 2022 Guidelines. The AEC's exemption is discussed in paragraphs 4.2–4.4.

7 *ibid.*, paragraph 11.

8 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, ANAO, Canberra, 2022, available from <https://www.anao.gov.au/work/performance-audit/australian-government-advertising-may-2019-to-october-2021> [accessed 20 August 2024].

8. The audit examined developments in the administration of the framework from November 2021 to November 2024. Three campaigns were selected for review:

- One Talk at a Time campaign, conducted from October 2023 to April 2025, administered by the Attorney-General's Department (AGD)⁹;
- Your Answer Matters campaign, conducted from August to October 2023, administered by Australian Electoral Commission (AEC)¹⁰; and
- Youth Vaping Education (phase one) campaign, conducted from February to June 2024, administered by the Department of Health and Aged Care (Health).¹¹

Conclusion

9. Finance has been effective at administering the framework. AGD and Health were largely compliant with the framework. The AEC largely complied with its internal requirements and the intent of the framework.

10. Finance has supported entities undertaking campaigns and has arrangements in place to manage brand safety risks relating to advertising on social media platforms. There are emerging gaps relating to the identification and management of risks, including to brand safety, associated with the use of artificial intelligence (AI) and emerging technologies in government advertising campaigns, and the changing nature of campaign activities, such as the use of media partnerships and influencers to reach target audiences in government campaigns. Finance extended the whole-of-government Master Media Agency contract after all extension options had been exercised. Finance has met its reporting requirements for expenditure on advertising campaigns.

11. AGD's One Talk at a Time campaign largely complied with the review, certification and publication requirements of the framework. AGD complied with the requirements of Principles 1 to 3 and largely complied with Principles 4 and 5 of the 2020 Guidelines. Campaign effectiveness was reduced by the delayed implementation of pre-launch public relations activities. Not all campaign materials contained appropriate attribution of Australian Government involvement and two procurements were not accurately reported on AusTender. The advertising component of the campaign was evaluated, with the evaluation report finding that the campaign 'achieved' one objective and 'partially achieved' two objectives. At November 2024, an evaluation addressing other aspects of the campaign had not been undertaken as public relations activities were still underway.

12. Since 2009, the AEC has had an exemption from most aspects of the framework and has committed to complying with the intent of the 2022 Guidelines. Documentation capturing the AEC's requirements for campaign development and certification, known as 'AEC communication campaigns: Guidelines and mandatory checklist' (AEC Guidelines), was in draft and there was no documented approval. The AEC's Your Answer Matters campaign largely complied with the

9 The campaign had a budget of \$22.3 million and was subject to the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020 (2020 Guidelines). Attorney-General's Department (AGD) advised the ANAO in January 2025 that the 'campaign has an anticipated end date of 30 April 2025.'

10 The campaign had a budget of \$33.6 million and was subject to the 'AEC communication campaigns: Guidelines and mandatory checklist'.

11 The campaign had a budget of \$1.2 million and was subject to the 2022 Guidelines.

review and publication requirements. Publication requirements were met, although AEC did not publish campaign research reports, did not document consideration of whether doing so was appropriate and there were inaccuracies in the reporting of campaign expenditure figures in the AEC annual report and subsequent reporting to the Department of Finance. The AEC complied with Principles 1 to 4 of the 2022 Guidelines and largely complied with Principle 5. Legal advice addressing all legal requirements of Principle 5 was finalised after the campaign had commenced. The AEC's requirements for attribution of AEC contribution to media partnerships and public relations materials was not documented. The AEC evaluated the campaign with the evaluation report finding that of the total 23 objectives, 16 were 'met', six were 'partly met' and one was 'not met'.

13. Health largely complied with the review, certification and publication requirements of the framework. Health complied with the requirements of Principles 1, 3 and 4 of the 2022 Guidelines and largely complied with Principles 2 and 5 of the 2022 Guidelines. Health did not document how campaign imagery reflected a diverse range of Australians. Not all campaign materials contained attribution of Australian Government involvement. Health evaluated the Youth Vaping Education (phase one) campaign to determine its effectiveness. The evaluation report consolidated the campaign's original seven objectives into four objectives. The evaluation found that two objectives were achieved and two objectives were partially achieved.

Supporting findings

Administration of the Australian Government campaign advertising framework — Finance

14. Finance maintains a suite of guidance documents on a clearly signposted section of its website and manages a campaign community through its GovTEAMS site to support entities undertaking campaigns throughout the campaign advertising development process. Finance facilitates the Independent Communications Committee's review process and provides advice to government regarding requests for exemption from the Guidelines. Finance has established arrangements to receive feedback from suppliers and entities through evaluations undertaken at the end of campaigns, with annual reviews providing a whole-of-government view across all campaigns. (See paragraphs 2.3 to 2.21)

15. Finance has arrangements to manage risks relating to brand safety on social media platforms. Given the changing nature of campaign activities there are emerging gaps in relation to the use of media partnerships, public relations and influencers. Gaps relate to the appropriateness of the level of information relating to these activities provided for final government review and the attribution of campaign materials. There is an absence of guidance around emerging risks, including to brand safety, relating to the potential use of AI and emerging technologies in advertising and information campaigns. Finance extended the whole-of-government Master Media Agency contract after all extension options had been exercised. (See paragraphs 2.22 to 2.80)

16. Finance has reported to the Parliament on annual media placement and associated campaign development expenditure by non-corporate Commonwealth entities, for campaigns with expenditure greater than \$250,000 (exclusive of GST), in its annual report on *Campaign Advertising by Australian Government Departments and Entities*. Details of expenditure relating

to Finance's contracts with the Master Media Agency and Independent Communications Committee (ICC) members have not been included in these reports. Finance guidance does not address the publication of advertising campaign research reports which, under the 2022 Guidelines, must be published on entity websites 'where it is appropriate to do so' for campaigns with an expenditure of \$250,000 (exclusive of GST) or more. (See paragraphs 2.81 to 2.93)

One Talk at a Time campaign

17. AGD's One Talk at a Time campaign received government approvals in accordance with the framework requirements applying at the time it was considered.

18. The Secretary of the Attorney-General's Department (Secretary of AGD), as the accountable authority, certified that the campaign complied with all five principles of the 2020 Guidelines and the certification was published on AGD's website, as required. The Secretary's certification was informed by a third-party certification from the ICC, as required by the 2020 Guidelines, and AGD advice on compliance. AGD provided the Attorney-General with the signed Secretary's certification.

19. AGD complied with publication requirements, except for those relating to the statement in its 2023–24 annual report. AGD published its developmental research report on the One Talk at a Time campaign website. (See paragraphs 3.14 to 3.24)

20. AGD complied with Principles 1 to 3 of the 2020 Guidelines and largely complied with Principles 4 and 5.

21. For Principle 4, campaign effectiveness was reduced by the delayed execution of pre-launch public relations activities. For Principle 5, 17 of the 21 media partnership materials had appropriate attribution statements noting Australian Government involvement and two of the campaign procurements were not accurately reported on AusTender. (See paragraphs 3.25 to 3.62)

22. Advertising components of the One Talk at a Time campaign were evaluated to determine their effectiveness. This evaluation identified that the advertising component of the campaign 'achieved' one objective and 'partially achieved' two objectives. At November 2024, the planned integrated evaluation of all campaign components, including media partnerships and public relations, had not been completed.

23. The performance of the campaign was monitored against media metrics, including key performance indicators (KPIs). AGD received in-flight monitoring of the campaign's performance, including a mid-campaign report and a final media performance report. (See paragraphs 3.63 to 3.71)

Your Answer Matters campaign

24. Due to its exemption, the AEC was not subject to review by the ICC or government review and approval processes. The AEC had documented requirements for campaign development and certification in the form of the AEC Guidelines. The version of the AEC Guidelines used for the Your Answer Matters campaign was in draft and there was no documented approval.

25. Under the AEC Guidelines, the AEC has committed to complying with the intent of the 2022 Guidelines. The AEC Guidelines did not establish a requirement for legal advice confirming compliance with Principle 5 of the 2022 Guidelines to be provided to the Electoral Commissioner prior to campaign certification.

26. The AEC followed an internal review process that involved the Electoral Commissioner providing approval for key campaign development milestones. The Electoral Commissioner signed two certifications for the campaign, which were both published on the AEC's website in accordance with the AEC Guidelines. The AEC did not publish campaign research reports on its website and did not document consideration of whether publication of the research reports was appropriate and there were inaccuracies in the reporting of campaign expenditure figures in the AEC annual report and subsequent reporting to the Department of Finance. (See paragraphs 4.18 to 4.40)

27. The AEC complied with the intent of Principles 1 to 4 of the 2022 Guidelines and largely complied with Principle 5. Legal advice addressing all legal requirements of Principle 5 was finalised after the campaign had commenced. The AEC had not documented attribution requirements for media partnerships or public relations materials. Details of one procurement were not accurately reported on AusTender. (See paragraphs 4.41 to 4.78)

28. The Your Answer Matters campaign was evaluated to determine its effectiveness. Of the 23 objectives across the five phases of the campaign, 16 were assessed as 'met', six were assessed as 'partly met' and one was assessed as 'not met'.

29. The performance of the campaign was monitored against media metrics, including KPIs. The AEC received weekly reporting on the performance of media channels. (See paragraphs 4.79 to 4.85)

Youth Vaping Education (phase one) campaign

30. Health's Youth Vaping Education (phase one) campaign received government approvals in accordance with the framework requirements applying at the time it was considered.

31. The accountable authority, the Secretary of the Department of Health and Aged Care (Secretary of Health and Aged Care), certified that the campaign complied with the five 'overarching principles' of the 2022 Guidelines and the certification was published on Health's website, as required. The Secretary's certification was informed by a third-party review from the ICC, as required by the 2022 Guidelines, and Health advice on compliance. Health provided the Secretary's certification to the Minister for Health and Aged Care on 3 May 2024, approximately three months after the campaign commenced, which was not compliant with the 2022 Guidelines.

32. Health complied with publication requirements. Health published the campaign developmental research report on its website. (See paragraphs 5.12 to 5.23)

33. Health complied with Principles 1, 3 and 4 and largely complied with Principles 2 and 5 of the 2022 Guidelines.

34. For Principle 2, Health did not document how campaign imagery reflected a diverse range of Australians. Legal advice provided in support of compliance with Principle 5 addressed the media partnerships component of the campaign but not the influencer component. Seventeen of

the 28 media partnership materials did not contain attribution of Australian Government contribution to the materials. Health's audit trail of procurement decision-making was mostly complete. (See paragraphs 5.24 to 5.74)

35. Health evaluated the Youth Vaping Education (phase one) campaign to determine its effectiveness. The evaluation report consolidated the campaign's original seven objectives into four objectives. The evaluation found that two objectives were achieved and two objectives were partially achieved.

36. Campaign performance was monitored against media metrics, including KPIs. Health received in-flight monitoring of the campaign's performance, including a report on the performance of influencers, a mid-campaign report and a final media performance report. (See paragraphs 5.75 to 5.82)

Recommendations

Recommendation no. 1
Paragraph 2.55 The Department of Finance develop supporting policy and guidance to identify and manage emerging risks, including to brand safety, relating to the use of artificial intelligence and emerging technologies in government advertising campaigns.

Department of Finance response: *Agreed.*

Recommendation no. 2
Paragraph 2.72 When planning future procurements for Master Media Agency services for Australian Government advertising, the Department of Finance provide sufficient time to enable the procurement process to be completed prior to exhausting all extension options available under the existing contract.

Department of Finance response: *Agreed.*

Recommendation no. 3
Paragraph 4.21 The Australian Electoral Commission update the 'AEC communications campaigns: Guidelines and mandatory checklist' (AEC Guidelines) to include:

- (a) a requirement for legal advice confirming compliance with Principle 5 of the Australian Government Guidelines on Information and Advertising campaigns to be provided to the Electoral Commissioner prior to campaign certification; and
- (b) details of version control and approval of the AEC Guidelines.

Australian Electoral Commission response: *Agreed.*

Summary of entity responses

37. The proposed audit report was provided to Finance, AGD, AEC and Health, with an extract being provided to the Independent Communications Committee. The entities' summary

responses are provided below, and their full responses are included at Appendix 1. Improvements observed by the ANAO during the course of this audit are listed in Appendix 2.

Department of Finance

The Department of Finance welcomes the conclusion that the Department has been effective in the whole-of-government administration of the Government's campaign advertising framework, including Finance's role in supporting entities, providing secretariat support to the Independent Communications Committee, meeting its requirements for reporting on campaign advertising expenditure by non-corporate Commonwealth entities, and having arrangements in place to manage brand safety risks relating to advertising on social media platforms.

Finance agrees the two recommendations directed to the Department and will take appropriate action to address the matters raised.

Attorney-General's Department

The Attorney-General's Department (the department) welcomes the Australian National Audit Office's (ANAO) report on Australian Government Advertising: November 2021 to November 2024, in particular the findings for the department's "One Talk at a Time" campaign.

The department agrees with the recommendations and acknowledges the opportunity for administrative improvements in relation to record keeping, attribution of Australian Government involvement in campaign activity and reporting on AusTender.

The department acknowledges the ANAO's finding that the campaign successfully achieved one objective and "partially achieved" two others. However, the full evaluation of the campaign's effectiveness is yet to be completed and is expected to conclude in 2025, following the completion of below-the-line activities.

The department is committed to continuous improvement and will use the ANAO's findings and recommendations to further refine our campaign processes and guidance.

Australian Electoral Commission

The Australian Electoral Commission (AEC) welcomes the ANAO report.

The AEC notes it is exempt from the Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities, including exemption from review and approval of AEC campaigns by government. This is due to the need for campaigns on electoral events to be independent of government. Instead, the AEC has its own Guidelines and certification process.

The AEC agrees with the one recommendation relating to improvement of our own Guidelines; and acknowledges the areas for improvement. We have reviewed and are addressing the highlighted administrative processes, noting they do not compromise compliance with our Guidelines.

The AEC remains committed to continuous improvement, and to our ongoing conformance with the intent of the Australian Government Guidelines.

Department of Health and Aged Care

The Department of Health and Aged Care (the department) acknowledges the findings in this report. The department is committed to responding to the opportunities for improvement identified by the Australian National Audit Office.

It is pleasing to note the finding the department was largely compliant with the Australian Government's campaign advertising framework, including the review, certification and publication requirements.

The department also welcomes the finding the department complied with the requirements of Principles 1, 3 and 4 of the 2022 Australian Government Guidelines on Information and Advertising Campaigns and largely complied with Principles 2 and 5 of the Guidelines. The department also appreciates the report's recognition the department established arrangements and processes to meet the objectivity requirements of Principle 2 of the Guidelines and mitigate the risks associated with engaging with influencers.

The audit identified two opportunities to improve the documentation of how a diverse range of Australians are reflected in campaign imagery and ensuring campaign materials contain appropriate attribution of the department's involvement. To address these findings, the department will continue to strengthen its administrative processes when implementing government advertising campaigns.

Key messages from this audit for all Australian Government entities

38. Below is a summary of key messages, including instances of good practice, which have been identified in this audit and may be relevant for the operations of other Australian Government entities.

Stewardship by framework policy owners

- Agencies responsible for whole-of-government frameworks should exercise stewardship of these frameworks, including by proactively identifying and managing emerging risks and issues related to the framework and maintaining a system of assurance and evaluation to ensure the framework remains fit for purpose.

Governance and risk management

- Entities undertaking advertising or information campaigns involving media partnerships and social media influencers should have appropriate assurances in place to ensure compliance with requirements, including documenting review and approval of all campaign materials and ensuring materials contain appropriate authorisation or attribution of Australian Government contribution.

Audit findings

1. Background

Introduction

Australian Government campaign advertising framework

1.1 The Australian Government's campaign advertising framework (the framework) applies to non-corporate Commonwealth entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).¹² The overarching aim of the framework, introduced in 2008, is to provide the Parliament and the community with confidence that public funds are used to meet the genuine information needs of the community.¹³

1.2 The government periodically issues guidance for entities undertaking information and advertising campaigns. The most recent version of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (the Guidelines) was released in December 2022 (2022 Guidelines)¹⁴, replacing the October 2020 Guidelines (2020 Guidelines). The Guidelines are administered by the Department of Finance (Finance) and state that they:

operate on the underpinning premise that:

- a. members of the public have equal rights to access comprehensive information about government policies, programs and services which affect their entitlements, rights and obligations; and
- b. governments may legitimately use public funds to explain government policies, programs or services, to inform members of the public of their obligations, rights and entitlements, to encourage informed consideration of issues or to change behaviour.¹⁵

12 At 1 August 2024, there were 101 non-corporate Commonwealth entities out of a total of 191 Commonwealth entities and companies. See Department of Finance, *Flipchart of PGPA Act Commonwealth entities and companies*, Finance, Canberra, 2024, available from <https://www.finance.gov.au/sites/default/files/2024-07/Flipchart%201%20August%202024%20-%20FINAL.pdf> [accessed 1 September 2024].

Non-corporate Commonwealth entities are legally and financially part of the Commonwealth of Australia. Conversely, corporate Commonwealth entities and Commonwealth companies are body corporates with separate legal personalities from the Commonwealth. The AEC, a non-corporate Commonwealth entity, has had an exemption from most aspects of the framework since 2009. The AEC's exemption is discussed in paragraphs 4.2–4.4.

13 The development and purpose of the framework, introduced in 2008, were reviewed in Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*, ANAO, Canberra, 2019, paragraphs 1–4 and paragraph 1.2–1.9, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019> [accessed 20 August 2024].

14 Department of Finance, *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2022 Guidelines), Finance, December 2022, available <https://www.finance.gov.au/sites/default/files/2022-12/Australian-Government-Guidelines-on-Information-Advertising-Campaigns-by-non-corporate-Commonwealth-entities.pdf> [accessed 20 August 2024].

15 *ibid.*, paragraph 4.

1.3 The Guidelines apply to all information and advertising campaigns¹⁶ undertaken in Australia by non-corporate Commonwealth entities.¹⁷ Entities subject to them:

must be able to demonstrate compliance with the five overarching principles when planning, developing and implementing publicly-funded information and advertising campaigns. The principles require that campaigns are:

- relevant to government responsibilities
- presented in an objective, fair and accessible manner
- objective and not directed at promoting party political interests
- justified and undertaken in an efficient, effective and relevant manner, and
- compliant with legal requirements and procurement policies and procedures¹⁸

1.4 The framework is intended to provide transparency in the development and implementation of government advertising and information campaigns, value for money in procurement, and the proper use of public resources. The key components of the framework are described in Box 1. As part of the framework, Finance has established mandatory procurement and evaluation mechanisms for entities conducting campaigns, which are described in Box 2. When reading the framework guidance, as reflected in Box 1, it is important to note the application of requirements relating to information campaigns as compared to advertising campaigns, as they may differ.

Box 1: Components of the framework

Responsibility for administration of the framework

The Government Communications Subcommittee (GCS) oversees and reviews Australian Government advertising campaigns involving paid media placement with a total campaign budget of more than \$500,000 (exclusive of GST). The Department of the Prime Minister and Cabinet (PM&C) issued a circular in 2022 for all entities preparing items for consideration by the GCS.

Initiation of proposed advertising campaigns valued above \$250,000 (exclusive of GST) requires authority from the Minister for Finance.

The Minister for Finance can exempt campaigns from complying with the Guidelines. Exemptions are discussed in paragraphs 2.10 to 2.12 of this report.

Finance provides policy advice, whole-of-government coordination, and assistance to entities conducting advertising activities.

16 Paragraph 5 of the 2022 Guidelines states that:

An advertising campaign includes paid media placement and an information campaign does not. Information campaigns typically involve a mix of public relations or below the line activities, but do not include a paid advertising component.

17 Finance, 2022 Guidelines, paragraph 7.

As discussed in Box 1, the Minister for Finance can exempt campaigns from complying with the Guidelines. The AEC's exemption is discussed in paragraphs 4.2–4.4.

18 *ibid.*, paragraph 11.

Finance publishes the Guidelines, which set out the five overarching principles that provide the context in which Australian Government campaigns are to be conducted.

Finance reports to the Parliament annually on campaign advertising by Australian Government departments and entities with expenditure greater than \$250,000 (exclusive of GST).^a For each campaign, these reports provide a short description and breakdown of expenditure by medium. They also provide data on media placement, market research and advertising production costs.

Other Finance functions related to government advertising campaigns include:

- providing secretariat services to the Independent Communications Committee (ICC), discussed below; and
- establishing and managing the contracts related to mandatory media placement and evaluation activities.

Responsibilities of ministers and entities conducting government campaigns

Ministers may authorise an advertising campaign's launch.

Entities subject to the Guidelines must be able to demonstrate compliance with the five overarching principles when undertaking campaigns.

An entity's accountable authority is required to:

- certify compliance with the Guidelines and related government policies for any advertising campaigns above \$250,000 (exclusive of GST) prior to a campaign's release into the market;
- ensure details of advertising campaigns are published in the entity's annual report; and
- 'where it is appropriate to do so' ensure research reports for advertising campaigns with expenditure of \$250,000 (exclusive of GST) or more are published on their entity's web site following the launch of a campaign.

There is also an expectation that the accountable authority will provide information to Finance for the purpose of Finance preparing reports to the Parliament that detail expenditure on all advertising campaigns with expenditure in excess of \$250,000 (exclusive of GST), commissioned by PGPA Act entities.

Third-party review role

The ICC consists of three members appointed by the Minister for Finance. Since early 2015^b the ICC's role in the framework has been to:

- provide compliance advice regarding Principles 1 to 4^c of the Guidelines to an entity's accountable authority when proposing to conduct an advertising campaign where expenditure is expected to be over \$250,000 (exclusive of GST);
- report, as necessary, to the responsible Minister(s) on the operation of the Guidelines, including any trends or emerging issues; and
- consider and, as necessary, propose revisions to the Guidelines to responsible Minister(s).

The ICC's compliance advice is published on Finance's website.^d

The Guidelines provide that information campaigns are not subject to ICC review, or certification by the accountable authority, but must comply with the Guidelines. Discussion of the ICC's terms of reference and the level of assurance provided to accountable authorities by the ICC is discussed in paragraph 2.6.

Government review and approval of campaigns

The GCS approves the final creative materials and media plans for campaigns.

Since November 2022, the GCS has overseen and reviewed campaigns involving paid media placement with a total campaign budget of more than \$500,000 (exclusive of GST).

The GCS receives evaluation summary reports from Finance.

Note a: These reports are published at <https://www.finance.gov.au/publications/reports/advertising>.

Note b: As outlined in paragraph 1.6, the ICC was suspended under the Interim Guidelines that were in place between July 2022 and December 2022.

Note c: The Guidelines state that 'Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.'

Note d: This advice is published at <https://www.finance.gov.au/publications/compliance-advice>.

Source: ANAO analysis of Finance information.

Box 2: Procurement and evaluation arrangements under the framework

Central Advertising System

The Central Advertising System (CAS) is the whole-of-government procurement arrangement mandated for all campaign and non-campaign advertising undertaken by non-corporate Commonwealth entities.^a The arrangement was established to consolidate expenditure and buying power to secure optimal media rates for the placement of government advertising. Following an open tender process, Finance appointed Universal McCann (UM) as the sole supplier Master Media Agency (MMA) for the period 1 July 2018 to 30 June 2021. The contract end date was extended in April 2021, to 30 June 2024. In May 2024 the contract was further extended to 30 September 2024. At 22 August 2024, the value of the MMA contract, as reported on AusTender, was approximately \$77.3 million. The MMA utilises UM Central, an online management system, which entities use to brief UM on their advertising requirements.

Government Communications Campaign Panel

The Government Communications Campaign Panel (GCCP) is the mandated whole-of-government panel arrangement, established by Finance in 2021. The GCCP lists 20 suppliers, each of which has a specific professional and content area aligned to the six pre-determined government priorities in which it can operate. Use of the GCCP is mandatory for all non-corporate Commonwealth entities with the exception of the Australian Electoral Commission (AEC)^b and the Defence Force Recruiting campaigns.^c

Whole-of-government campaign evaluation framework

Effective 1 July 2018, following a limited tender process, Finance established a single provider (Hall & Partners) to provide standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 (exclusive of GST) per financial year.

Finance entered into a new arrangement with Hall & Partners in July 2022. In June 2024 this arrangement was extended to 30 June 2025. The use of the whole-of-government campaign evaluation framework is mandatory for non-corporate Commonwealth entities, with the exception of the AEC.^b

In October 2024, Finance estimated Hall & Partners provided campaign evaluation services to the value of approximately \$7.9 million (inclusive of GST) between 1 July 2022 and 30 September 2024.

Note a: Corporate Commonwealth entities, Commonwealth companies under the PGPA Act and certain other approved organisations provided with Commonwealth funding for advertising or communications purposes may place their advertising through the CAS.

Note b: The AEC's exemption is discussed in paragraphs 4.2 to 4.4.

Note c: The Defence Force Recruiting exemption from using the GCCP commenced in 2021 and is not in scope of this audit. As discussed in paragraph 1.14, Defence Force Recruiting advertising was assessed in Auditor-General Report No.45 2023–24 *Defence's Management of Recruitment Advertising Campaigns*.

Source: ANAO analysis of Finance information.

Framework developments

1.5 The ANAO last reviewed the framework in 2022.¹⁹ Developments since then have included revisions (see paragraph 1.7) to the Guidelines and implementation of the 'village model' of campaign development.

Revised Guidelines

1.6 Interim Guidelines were in effect between July and December 2022.²⁰ They suspended the operation of the ICC²¹ and provided for the Minister for Finance to approve campaigns to proceed to market. This did not affect the three campaigns assessed in this audit.

1.7 The Guidelines have been revised periodically since their introduction in 2008. Changes between the 2020 Guidelines and the 2022 Guidelines were:

- clarification that all dollar figures are to be read as exclusive of GST;
- the Minister for Finance assuming responsibilities previously undertaken by the Special Minister of State; and
- that specific consideration is given to communicating with people with disability and that imagery used in campaigns appropriately reflects people with disability.²²

19 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, ANAO, Canberra, 2022, available from <https://www.anao.gov.au/work/performance-audit/australian-government-advertising-may-2019-to-october-2021> [accessed 20 August 2024].

20 Interim Guidelines were introduced while ongoing governance arrangements were being established after the change of government in May 2022.

21 The Interim Guidelines stated that 'The Independent Communications Committee will not convene under the interim guidelines, unless instructed by the Minister for Finance.' The Independent Communications Committee (ICC's) role in reviewing campaigns was removed in the Interim Guidelines. The ICC was reinstated from December 2022.

22 These changes both relate to 'considerations' for entity in demonstrating compliance with Principle 2, which requires that campaigns are 'presented in an objective, fair and accessible manner'.

Governance arrangements

1.8 In 2022, PM&C issued a circular to all entities preparing items for consideration by the GCS. The circular captures oversight and review arrangements established by the GCS.²³

Implementation of the ‘village model’

1.9 The 2022 ANAO audit reported on the establishment of a ‘new communications framework and strategic themes for government campaigns’.²⁴ Following reviews undertaken in 2019 into the effectiveness of the approach to developing government campaigns, changes were implemented under which campaigns are aligned to one of six strategic themes, and campaigns within each theme are developed with the support of a ‘village’ of suppliers.²⁵ The village model is discussed further in paragraphs 2.13 to 2.18.

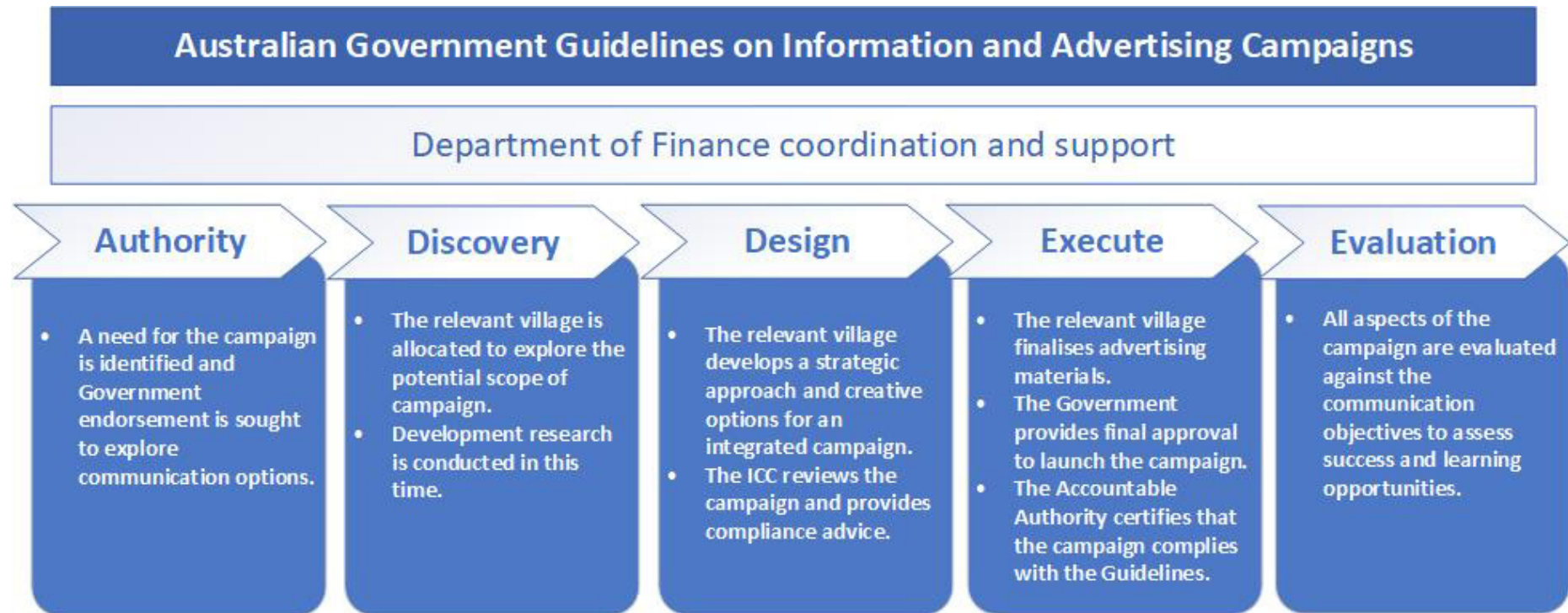
1.10 The campaign development process is outlined in Figure 1.1.

23 These arrangements are captured in Box 1: Components of the Australian Government’s campaign framework.

24 During the period covered by Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021* (2022 audit), Department of Finance (Finance) established the new arrangements and commenced transitioning to them. The 2022 audit did not include an assessment of any campaigns developed under the village model.

25 The villages are comprised of Government Communications Campaign Panel (GCCP) suppliers assigned to the relevant ‘strategic theme’, the Master Media Agency (MMA) and the whole-of-government evaluation provider. There is one GCCP supplier for each type of ‘media requirement’ in each village — the GCCP suppliers and the villages they have been allocated to are listed in Appendix 3. Under the Department of the Prime Minister and Cabinet (PM&C) circular discussed in paragraph 1.8, villages are assigned by the Minister for Finance when campaigns receive authorisation to commence. As discussed in paragraph 2.14, Finance advised the ANAO in October 2024 that following the July 2024 update to the Commonwealth Procurement Rules, ‘The role of allocation of campaigns to GCCP Villages is now undertaken by the Department of Finance.’ For the background on the development of the village model see Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, paragraphs 1.11–1.24.

Figure 1.1: Campaign development process



Source: Finance documentation.

Rationale for undertaking the audit

1.11 This audit is part of an ongoing program of performance audits on Australian Government advertising. The rationale for undertaking this audit is to provide the Parliament with information on key developments in the framework since the period covered by the 2022 ANAO audit, when the ANAO last reported on its operation.

1.12 The audit provides independent assurance on whole-of-government administration of the framework by the Department of Finance and selected entities' compliance with the Guidelines and the wider framework requirements.

Previous audits

1.13 The administration of Australian Government advertising has been examined in previous ANAO performance audit reports, which also reviewed the development of the framework since its introduction in 2008. The 2019 audit report included 10 recommendations, five of which were directed to Finance or the Australian Government and five directed to the three other entities included in the audit.²⁶ The 2022 audit contained seven recommendations, one directed to Finance and six directed to the other entities included in the audit.²⁷ Finance's implementation of the recommendation addressed to it in the 2022 audit is discussed in paragraphs 2.27 to 2.28.²⁸ The other entities assessed in this audit were not included in the 2022 audit.

1.14 In 2024, an audit of *Defence's Management of Recruiting Advertising Campaigns* assessed whether three Defence Force Recruitment campaigns complied with the framework.²⁹ The audit found that 'The Department of Defence's management of the three selected advertising campaigns for Australian Defence Force recruitment was largely effective.'³⁰ The report contained three recommendations aimed at improving the transparency of Defence's public reporting on individual advertising campaigns and complying with the framework with respect to end of campaign evaluations.³¹

Audit approach

Audit objective, criteria and scope

1.15 The objective of the audit was to assess the effectiveness of the Department of Finance's and selected entities' implementation of the Australian Government's campaign advertising framework.

26 Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*, p. 9.

27 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*.

28 The ANAO previously assessed this recommendation as 'not implemented'. See Auditor-General Report No.17 2023–24 *Implementation of Parliamentary Committee and Auditor-General Recommendations — Department of Finance*, ANAO, Canberra, 2024, available from <https://www.anao.gov.au/work/performance-audit/implementation-parliamentary-committee-and-auditor-general-recommendations-department-of-finance> [accessed 9 September 2024].

29 Auditor-General Report No.45 2023–24 *Defence's Management of Recruitment Advertising Campaigns*, ANAO, Canberra, 2024, paragraph 5, available from <https://www.anao.gov.au/work/performance-audit/defences-management-recruitment-advertising-campaigns> [accessed 2 September 2024].

30 *ibid.*, paragraphs 9–14.

31 *ibid.*

1.16 To form a conclusion against this objective, the following high-level criteria were adopted:

- Does the Department of Finance effectively administer the Australian Government’s campaign advertising framework?
- Were selected campaigns compliant with the Australian Government’s campaign advertising framework?

1.17 The audit examined developments in the administration of the framework from November 2021 to November 2024. Three campaigns were selected for review:

- One Talk at a Time campaign, conducted from October 2023 to April 2025, administered by the Attorney-General’s Department (AGD)³²;
- Your Answer Matters campaign, conducted from August to October 2023, administered by Australian Electoral Commission (AEC)³³; and
- Youth Vaping Education (phase one) campaign, conducted from February to June 2024, administered by the Department of Health and Aged Care (Health).³⁴

The Australian Electoral Commission exemption

1.18 Since 2009, the AEC has an exemption from most elements of the framework.³⁵ The AEC has committed to adhering to the intent of the Guidelines and places media through the MMA. The AEC’s exemption is discussed in paragraphs 4.2 to 4.4. For the purposes of this audit, the AEC was assessed for compliance against its internal review and certification arrangements, and for compliance with the intent of the Guidelines.³⁶

Audit methodology

1.19 The audit methodology included:

- reviewing Finance’s advice to government, advice to entities and public reporting produced by Finance;
- reviewing meeting minutes and decisions of the ICC, and meeting with committee members;
- reviewing entity documentation relating to campaign design, administration, certification and evaluation to determine compliance; and

32 The campaign had a budget of \$22.3 million and was subject to the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020 (2020 Guidelines). AGD advised the ANAO in January 2025 that the ‘campaign has an anticipated end date of 30 April 2025.’

33 The campaign had a budget of \$33.6 million and was subject to the ‘AEC communication campaigns: Guidelines and mandatory checklist’.

34 The campaign had a budget of \$1.2 million and was subject to the 2022 Guidelines.

35 AEC documentation states that the exemption is renewed each electoral cycle (see paragraph 4.4). The circumstances of the AEC’s 2009 exemption are discussed in Auditor-General Report No.24 2011–12, *Administration of Government Advertising Arrangements: March 2010 to August 2011*, ANAO, Canberra, 2012, paragraphs 7.9–7.27, available from <https://www.anao.gov.au/work/performance-audit/administration-government-advertising-arrangements-march-2010-to-august-2011> [accessed 2 September 2024].

36 This approach was adopted in the last ANAO review of an AEC advertising campaign. See Auditor-General Report No.24 2011–12, *Administration of Government Advertising Arrangements: March 2010 to August 2011*, Chapter 7.

- meetings with key personnel at each designated entity.

1.20 Australian Government entities largely give the ANAO electronic access to records by consent, in a form useful for audit purposes. For the purposes of this audit, the Department of Health and Aged Care advised the ANAO that it would not voluntarily provide certain information requested by the ANAO due to concerns about its obligations under the *Privacy Act 1988*, secrecy provisions in Health and Aged Care portfolio legislation, confidentiality provisions in contracts and the *Public Interest Disclosure Act 2013*. Health advised that this type of information largely was not segregated in Health's record-keeping systems and Health could not be certain, in providing documents through electronic means, that documents containing this type of information were excluded. To provide comfort to the Secretary of Health and Aged Care regarding its obligations under portfolio legislation, on 30 April 2024 the acting Auditor-General issued the Secretary of Health and Aged Care with a notice directing the Secretary of Health and Aged Care to provide information and produce documents pursuant to section 32 of the *Auditor-General Act 1997*. Under this notice, Health agreed to provide the information and documents requested through electronic means.

1.21 The audit was conducted in accordance with ANAO Auditing Standards at a cost to the ANAO of approximately \$773,700.

1.22 The team members for this audit were James Sheeran, Grace Guilfoyle, Stephanie Gill, Alexandra McFadyen, Alannah Perry and Susan Drennan.

2. Administration of the Australian Government campaign advertising framework — Finance

Areas examined

This chapter examines whether the Department of Finance (Finance) has effectively administered the Australian Government’s campaign advertising framework (the framework).

Conclusion

Finance has been effective at administering the framework. Finance has supported entities undertaking campaigns and has arrangements in place to manage brand safety risks relating to advertising on social media platforms. There are emerging gaps relating to the identification and management of risks, including to brand safety, associated with the use of artificial intelligence (AI) and emerging technologies in government advertising campaigns, and the changing nature of campaign activities, such as the use of media partnerships and influencers to reach target audiences in government campaigns. Finance extended the whole-of-government Master Media Agency contract after all extension options had been exercised. Finance has met its reporting requirements for expenditure on advertising campaigns.

Areas for improvement

The ANAO made two recommendations aimed at the establishment of policy and guidance to identify and manage risks relating to the use of AI in government advertising campaigns and improving procurement practices.

The ANAO identified three opportunities for improvement. These relate to: reviewing the appropriateness of the level of information provided as part of government review of advertising campaigns; developing guidance on the attribution of media partnerships, public relations and influencer materials; and developing guidance relating to publication of campaign-related research.

2.1 The framework is intended to provide transparency in the development and implementation of government advertising and information campaigns, value for money in procurement, and the proper use of public resources.

2.2 Finance provides whole-of-government policy advice, coordination, and assistance to entities conducting campaign and non-campaign advertising activities.³⁷ Finance supports entities implementing the framework by providing general guidance, support for individual campaigns and managing whole-of-government procurement arrangements. Finance is also responsible for responding to emerging risks and issues relating to Australian Government advertising and supporting transparency through public reporting.

37 Department of Finance, *Advertising*, Finance, Canberra, 2024, available from <https://www.finance.gov.au/government/advertising> [accessed 17 September 2024].

Does Finance effectively support entities in their implementation of the framework?

Finance maintains a suite of guidance documents on a clearly signposted section of its website and manages a campaign community through its GovTEAMS site to support entities undertaking campaigns throughout the campaign advertising development process. Finance facilitates the Independent Communications Committee's review process and provides advice to government regarding requests for exemption from the Guidelines. Finance has established arrangements to receive feedback from suppliers and entities through evaluations undertaken at the end of campaigns, with annual reviews providing a whole-of-government view across all campaigns.

Guidance and resources for entities

2.3 Finance publishes information relating to the framework on its website, which is signposted under four categories: Government Advertising Overview; Policies and Guidance; Publications and Compliance Advice; and Guidance and Information.³⁸ Advice to entities is further facilitated on the 'Campaign Community' GovTEAMS site, which is administered by Finance³⁹, and by responding to entity enquiries via email and telephone.⁴⁰ Finance does not collect data on the number of emails and phone calls it receives from entities seeking advice.

2.4 At September 2024, there were 201 members from 28 entities with access to the GovTEAMS site, which provides entities access to:

- high level information on campaign governance processes;
- access to seminars and learning materials;
- a resource library for different campaign stages;
- a 'news' function through which Finance provides updates to entities on procurement arrangements, newly commenced campaigns and updates to guidance and other resources available on the GovTEAMS site; and
- contact details for officers in Finance providing support to entity campaign managers and campaign suppliers.

2.5 Between July 2022 and November 2024, Finance delivered 11 seminars through GovTEAMS to support entities in their advertising activities. Topics covered included: examples of campaign development under the village model; campaign evaluation insights; inclusivity in campaigns; media mixes; and the evolution of television and video-based advertising.

38 *ibid.*

39 GovTEAMS is a whole-of-government virtual collaboration service for the APS. It includes a website and channels for broadcast and other messaging. GovTEAMS is managed by Finance.

40 This includes the AEC and Department of Defence (Defence) officials working on Defence Force Recruiting (DFR), where there are exemptions in place for elements of the framework, including development of campaigns under the village model (see paragraphs 2.13–2.18).

Independent Communications Committee

2.6 The Independent Communications Committee (ICC) undertakes a third-party review of government advertising campaigns and provides compliance advice to entity accountable authorities.⁴¹ The committee's functions are described in its terms of reference:

- reviewing the evidence and documentation supporting the development of campaigns, particularly in regard to adherence with the Principles 1 to 4 of the Guidelines. The Committee's consideration of compliance draws upon;
 - associated market research or supporting evidence, media strategy and media plan, and any other information or independent expert advice available.
- meeting with representatives from responsible entities developing campaigns to clarify information presented in the documentation (if required);
- providing a report to the Accountable Authority (Chief Executive/Secretary) on compliance with reference to Principles 1 to 4 of the Guidelines⁴²;
- reporting to responsible Ministers on the operation of the Guidelines, as necessary, including any trends and emerging issues; and
- considering and proposing to responsible Ministers any revisions to the Guidelines as necessary in light of experience.

2.7 The ICC has not provided advice to the responsible minister during the period under review.⁴³

2.8 Finance provides secretariat support for the ICC and attends all meetings. A guide for entities has been developed on the ICC process, including an overview of the ICC's role, meeting arrangements and the level of representation entities should provide at meetings. Templates are also provided to entities to assist with the efficiency of briefing materials and feedback is provided to entities, from the ICC, regarding their processes and expectations.

2.9 The ICC held 34 meetings between 1 November 2021 and 18 September 2024. The minutes documented 65 instances where the ICC determined that campaigns were capable of being compliant with the Guidelines and 13 instances where the ICC advised entities that more work was required before independent advice on the proposed campaign and compliance with the Guidelines could be provided. ICC members advised the ANAO in September 2024 that they had initiated a

41 Under the 2022 Guidelines, entity accountable authorities are responsible for certifying that campaigns comply with the Guidelines. The same requirement applied under the 2020 Guidelines. Finance advised the ANAO in August 2024 that 'Finance does not possess a formal role in providing advice on Guideline compliance as this is the stated responsibility of the ICC and relevant entities.'

42 The ANAO has previously observed that the ICC's role does not involve the examination of actual final campaign material and recommended that the ICC's terms of reference be amended to enable the ICC to review and advise on final advertising materials, including creative materials. In September 2020, the government decided to not implement the ANAO recommendation. The 2020 government decision to not implement the recommendation was reported in Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, paragraphs 2.23–2.27, available from <https://www.anao.gov.au/work/performance-audit/australian-government-advertising-may-2019-to-october-2021> [accessed 20 August 2024].

ICC members advised the ANAO in September 2024 that the timing of the ICC review of campaigns allowed it to provide compliance advice before significant expenditure had been incurred.

43 At November 2024, the responsible minister was the Minister for Finance.

process change under which minutes of ICC meetings are provided to accountable authorities for transparency purposes.⁴⁴

Exemptions from the Guidelines

2.10 The 2022 Guidelines provide that the Minister for Finance can exempt a campaign from complying with the Guidelines ‘on the basis of a national emergency, extreme urgency or other compelling reason.’ The 2020 Guidelines had the same provision, except that the Special Minister of State (SMOS) was the decision-maker.⁴⁵ Both the 2020 and 2022 versions of the Guidelines provided that ‘Where an exemption is approved, the Independent Communications Committee will be informed of the exemption, and the decision will be formally recorded and reported to the Parliament as soon as is practicable.’ Finance facilitates consideration of exemption requests by advising entities on the required process, providing briefings to government on requests received and fulfilling reporting obligations.

2.11 During the audit period, one campaign was exempted. This was the Department of Health and Aged Care’s COVID-19 campaign, for which the Minister for Health and Aged Care sought an exemption for the month of January 2022 only. The campaign was to inform the Australian community on: vaccine delivery; changes to COVID-19 testing requirements and eligibility; and the benefits of COVID-safe behaviour. Finance prepared briefing materials for the SMOS and informed the ICC of the exemption, as required under the 2020 Guidelines. The exemption was reported to the Parliament, fulfilling the requirements of paragraph 9 of the 2020 Guidelines.⁴⁶ The exemption was reported in Finance’s *Campaign Advertising by Australian Government Departments and Entities Report 2021–22*.

Australian Electoral Commission’s exemption

2.12 The Australian Electoral Commission’s (AEC’s) exemption from aspects of the framework, including the Guidelines, is discussed in paragraphs 4.2 to 4.4. The Electoral Commissioner requested the exemption by writing directly to the Minister for Finance and noted that Finance had been consulted in preparing the exemption request.

Implementation of the ‘village model’

2.13 In March 2021, Finance established the Government Communications Campaign Panel (GCCP) (SON3754402) as a mandatory whole-of-government panel for the engagement of communications suppliers for advertising and information campaigns undertaken by non-corporate

44 Finance advised the ANAO in October 2024 that:

ICC Minutes have been and continue to be provided to entities. The ICC have requested, where possible, for Minutes to accompany correspondence to accountable authorities on a proposed campaign’s capability of compliance with the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*. Previously, these two documents were sent separately to entities with the Accountable Authority receiving ICC compliance advice, and the responsible campaign area receiving the Minutes.

45 Changes between the 2020 and 2022 versions of the Guidelines are discussed in paragraph 1.7.

46 Australian House of Representatives (2022) *Votes and Proceedings*, (164):2484, available from https://parlinfo.aph.gov.au/parlInfo/download/chamber/votes/fb1bae51-eafe-4eee-ae9b-af457b142987/toc_pdf/rep-vp.pdf;fileType=application%2Fpdf#search=%22chamber/votes/fb1bae51-eafe-4eee-ae9b-af457b142987/0000%22 [accessed 19 November 2024].

Australian Senate (2022) *Journals*, (138):4611, available from https://parlinfo.aph.gov.au/parlInfo/download/chamber/journals/a42a482f-eed8-4e14-8dd4-7ce028cc2072/toc_pdf/sen-jn.pdf;fileType=application%2Fpdf [accessed 20 November 2024].

Commonwealth entities.⁴⁷ Since the establishment of the panel, Defence Force Recruiting (DFR) campaigns⁴⁸ and campaigns undertaken by the AEC have been exempt from using the GCCP.⁴⁹

2.14 Suppliers on the GCCP are structured under six ‘strategic themes’: security; health and wellbeing; economy; program delivery; building our community; and infrastructure and innovation.⁵⁰ GCCP suppliers, together with the Master Media Agency (MMA) (Universal McCann (UM)), the whole-of-government evaluations supplier (Hall & Partners), entities undertaking campaigns, and Finance⁵¹ form ‘villages’ under each strategic theme. The same combination of suppliers (one from each category) work on all campaigns within the same theme.⁵² Under the circular issued by the Department of the Prime Minister and Cabinet (PM&C), the Minister for Finance approves the strategic theme and the associated village of suppliers for each campaign.⁵³ Finance advised the ANAO in October 2024 that:

It should be noted that Minister for Finance’s role has evolved over the period of the audit to no longer being responsible for the allocation of proposed campaigns to Government Communications Campaign Panel (GCCP) Villages. This change in role aligns with the update to the Commonwealth Procurement [Rules]–July 2024 (CPRs) that state:

“3.2 Except where required by law, it is the government’s policy position that ministers will not:

a. be involved in the conduct of procurement processes; or

b. direct officials about the conduct of procurement processes.”

...

The role of allocation of campaigns to GCCP Villages is now undertaken by the Department of Finance.

2.15 Finance further advised the ANAO in October 2024 that it ‘has liaised with PM&C to seek an update to the relevant Circular’. Figure 2.1 shows the make-up of each campaign village.⁵⁴

47 The GCCP is discussed in Chapter 1 (Box 2).

48 DFR campaigns are undertaken by Defence and were exempted from use of the GCCP because Defence’s established arrangements were considered to better meet the needs of DRF campaigns. DFR campaigns were the subject of Auditor-General Report No.45 2023–24, *Defence’s Management of Recruitment Advertising Campaigns*, ANAO, Canberra, 2024, available from <https://www.anao.gov.au/work/performance-audit/defences-management-recruitment-advertising-campaigns> [accessed 2 September 2024].

49 As discussed in paragraph 4.2, the AEC has an exemption from most aspects of the Australian Government’s campaign advertising framework. This includes use of the GCCP and the village process. The AEC’s campaign development process is discussed in paragraphs 4.18 to 4.30.

50 The program delivery village was previously known as the ‘delivering government programs and services’ village.

51 See paragraph 2.17.

52 There have been exceptions where entities have used suppliers from outside of their allocated village. For example, see paragraphs 5.72 and 5.73.

53 Entities undertake separate procurements with each allocated supplier that will be required for a campaign.

54 For a list of the GCCP suppliers and the villages they have been allocated, see Appendix 3.

Figure 2.1: Village model for campaign development^a

Government		Consultants						
Responsible department	Finance	Creative	Research	Public Relations	Multicultural	Aboriginal & Torres Strait Islander	Master Media Agency	Evaluation Provider
The campaign is driven by the responsible department . The responsible department is accountable to the government for campaign delivery and for all authorities and approvals throughout the process	Communications Branch at Finance is responsible for coordinating government communications campaigns, including providing advice and support on best practice campaign development	A full-service creative agency responding to the creative brief and applying strategic insights to develop and implement core creative ideas for application across an integrated campaign	A research agency who is skilled at identifying audience-led insights at all developmental stages, and capturing learnings for future campaigns	A public relations agency that can extend the reach of campaigns through leveraging earned and owned channels, content marketing, and other below-the-line tactics	A specialist in communicating with multicultural audiences, understanding the different nuances, communications challenges and opportunities to effectively engage with these audiences	A specialist in communicating with Aboriginal & Torres Strait Islander audiences in a respectful, sensitive, relevant and effective way	The master media agency who provides advice on media strategies, develops media plans and places the media	The whole-of-government evaluation provider who conducts benchmarking, tracking and evaluation research services

Note a: GCCP suppliers provide the services in columns 3 to 7.

Source: Finance documentation.

2.16 Finance has detailed the campaign development process that occurs under the village model in the Village Implementation Guide (the Guide). The February 2023 version of the Guide states:

This Village format allows teams of consultants to work more closely together, and from an earlier stage, with the responsible department to respond to specific campaign requirements. Developing knowledge and experience on certain campaign themes, and applying those learnings with each new campaign that is initiated.

2.17 The village model facilitates entities undertaking campaigns to work with Finance and their assigned village suppliers from the initiation of a campaign until its completion and evaluation.⁵⁵ Finance attends campaign development meetings with suppliers, ICC meetings and meetings where campaigns are reviewed by government. Finance’s Communications Advice Branch (CAB) assigns a ‘CAB Campaign Manager’ to each campaign to support the process. The Guide states that the CAB Campaign Manager:

- Provides leadership of campaign development from a whole-of-government perspective
- Assists in the successful operation and collaboration across the Village and seeks to resolve any issues related to process or approach
- Works closely with the responsible department Campaign Manager.
- ...
- Review of Village efficacy and collaboration on a regular basis
- Provision of operational feedback to Village outside of normal campaign reviews.

2.18 For each step in the campaign development process, the Guide provides information on the outcomes to be achieved and links to resources in the form of guidance and templates (see paragraphs 2.3 to 2.5).

Village model feedback

2.19 Finance has received feedback from suppliers and entities engaged under the village model through evaluations undertaken at the end of each campaign.⁵⁶ Respondents were asked three questions:

How do you rate the overall advice and support provided by CAB throughout the process, including as an escalation point?

Do you think CAB provides appropriate/useful guidance on best practice implementation of the Village model, to help with campaigns?

Are there areas in which CAB could provide guidance or support that it is not currently providing?

55 Figure 1.1 in Chapter 1 outlines the campaign development process.

56 The areas of feedback included: entities working with village suppliers; suppliers on the performance of the village; suppliers and Communications Advice Branch (CAB) on working with the entity undertaking the campaign; overall village process; and CAB and the entity undertaking the campaign on Universal McCann (UM) and Hall & Partners.

2.20 At September 2024, there had been two ‘annual reviews’ capturing information from evaluations across two periods: from August 2022 to June 2023 (dated August 2023); and July 2023 to February 2024 (dated March 2024). The reviews found:

- entities’ ratings for Finance’s overall advice and support improved by 13 percentage points between the two reporting periods, with 87 per cent providing a ‘good’ rating or above in the August 2023 report, and 100 per cent providing the same rating in the March 2024 report.⁵⁷
- suppliers’ ratings for Finance’s overall advice and support improved by two percentage points between the two reporting periods, with 93 per cent providing a ‘good’ rating or above in the August 2023 report and 95 per cent in the March 2024 report.

2.21 In both the August 2023 and March 2024 reports, 94 per cent of village suppliers thought that Finance provided ‘appropriate/useful guidance on best practice implementation of the village model, to help with campaigns’. The number of respondents who identified areas of additional guidance or support that Finance could provide fell from 42 per cent in the August 2023 report to 26 per cent in the March 2024 report (16 percentage point decrease).

Has Finance managed emerging risks and issues relating to government advertising?

Finance has arrangements to manage risks relating to brand safety on social media platforms. Given the changing nature of campaign activities there are emerging gaps in relation to the use of media partnerships, public relations and influencers. Gaps relate to the appropriateness of the level of information relating to these activities provided for final government review and the attribution of campaign materials. There is an absence of guidance around emerging risks, including to brand safety, relating to the potential use of AI and emerging technologies in advertising and information campaigns. Finance extended the whole-of-government Master Media Agency contract after all extension options had been exercised.

Evolving communication activities

2.22 Government advertising campaigns are increasingly using communication activities such as media partnerships⁵⁸, public relations and influencers⁵⁹, in addition to, or instead of, established communication channels such as the placement of advertisements on television, radio, outdoor displays and in cinemas. Campaigns assessed in this audit have included media partnerships, public relations and influencers.⁶⁰ Key aspects of the framework — such as government approval and accountable authority certification — are primarily focused on advertisements, meaning there is a risk that different communication activities, as described above, are not subject to the same level of oversight or they are not addressed in guidance provided by Finance.

57 Entities are asked to provide a rating of ‘Excellent’, ‘Very good’, ‘Good’, ‘Fair’ or ‘Poor’.

58 Media partnerships involve paid content being developed in partnership with a media outlet and hosted on the outlet’s platform.

59 Finance guidance defines an influencer as ‘an individual who has established credibility with a large audience and can persuade others to act based on their opinion.’

60 The Department of Health and Aged Care’s (Health) use of influencers was undertaken through a public relations supplier (see Chapter 5).

Definition of advertising

2.23 The 2022 Guidelines distinguish between ‘advertising campaigns’ and ‘information campaigns’⁶¹, stating that ‘An advertising campaign includes paid media placement and an information campaign does not’. Advertising campaigns with a budget of \$250,000 (exclusive of GST) or more are subject to review by the ICC and accountable authority certification. Advertising campaigns with a budget of \$500,000 (exclusive of GST) or higher are also subject to review and approval by the Government Communications Subcommittee (GCS). Information campaigns are not subject to these review steps, irrespective of budget. Whether campaign activities or materials constitute ‘advertising’ also affects authorisation requirements for campaign materials (see paragraphs 2.31 to 2.32).

2.24 In September 2024, Finance issued guidance clarifying the definition of ‘paid media placement’, which states that:

“Paid media placement” refers to communication material that is placed in an environment or in front of an audience for a fee. It encompasses all forms of advertising, including, but not limited to, standard advertising placement, media partnerships and paid influencer activity.⁶²

Certification and approval of paid partnership and public relations activities

2.25 The arrangements for approval by the GCS and certification by the accountable authority are timed to allow for the review of advertising materials.⁶³ This does not always allow for the review of other campaign materials, such as those relating to media partnerships, public relations activities and influencers, which may still be in development at the time of GCS review and accountable authority certification.⁶⁴

2.26 The Attorney-General’s Department (AGD), AEC and Department of Health and Aged Care (Health) campaigns reviewed in this audit included media partnership and public relations materials. Entities’ review of final media partnership and public relations materials varied.

- In the AGD campaign, no media partnership materials and only a small number of public relations materials had been created at the final government review and accountable authority certification stage.⁶⁵
- In the Health campaign, five of the media partnership materials and no public relations materials were submitted at these review stages.⁶⁶

61 Paragraph 5 of the 2022 Guidelines defines a campaign as ‘a planned series of communication activities that share common objectives, target the same audience and have specific timelines and a dedicated budget.’ This distinction was also contained in the 2020 Guidelines.

62 Prior to September 2024, Finance guidance did not address whether media partnerships, public relations or influencers constituted ‘paid media placement’. This has been a development since the commencement of this performance audit.

63 As shown in Figure 1.1, in Chapter 1 of this report, at the ‘Execute’ stage, government approval and accountable authority certification occurs at the time when advertisements are finalised.

64 In some instances, strategies or plans for public relations or use of influencers may be available for review at this stage of the process.

65 See paragraphs 3.16 and 3.17.

66 See paragraphs 5.14 and 5.15.

- In both the AGD and Health campaigns, materials were later reviewed and approved by officials prior to their use in the campaign.⁶⁷
- In the AEC campaign, the Electoral Commissioner reviewed and approved final media partnership and public relations materials prior to their use.⁶⁸

2.27 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021* (2022 ANAO Government Advertising Report) included a recommendation that: ‘The Department of Finance clarify the application of certification requirements for public relations activities under the 2020 *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*.’⁶⁹ In Auditor-General Report No.17 2023–24, *Implementation of Parliamentary Committee and Auditor-General Recommendations — Department of Finance*, this recommendation was assessed as ‘not implemented’.⁷⁰

2.28 Finance provides guidance to entities on accountable authority certification. In September 2024, Finance updated its guidance to clarify that certification requirements applied to both advertising and non-advertising activities, including public relations:

The Accountable Authority considers the campaign in its entirety and certifies that both advertising and non-advertising activities comply with the Guidelines.

This includes activities described as “public relations”, “community engagement” or “below the line.” These terms are commonly used to describe communication approaches that seek to influence the attitudes, knowledge or behaviour of an audience through communication methods that are not advertising and do not require a placement fee. Activities include, but are not limited to, editorial media, digital content/social media, stakeholder engagement and events. Public relations activity often targets priority audiences, including First Nations Australians and people from Culturally and Linguistically Diverse Backgrounds.⁷¹

2.29 The guidance further states that:

A comprehensive communications strategy outlining intended public relations, media partnership, and/or influencer activity should be submitted to the Accountable Authority to allow for proper review of all campaign elements as part of the certification process.

67 For the AGD campaign, see paragraphs 3.32 and 3.33. For the Health campaign, see paragraphs 5.33 and 5.34.

68 See paragraph 4.23. As discussed in paragraph 4.3, the AEC campaigns are not subject to government review.

69 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, ANAO, Canberra, 2022, paragraph 2.13.

70 Auditor-General Report No.17 2023–24, *Implementation of Parliamentary Committee and Auditor-General Recommendations — Department of Finance*, ANAO, Canberra, 2024, Table 3.6, available from <https://www.anao.gov.au/work/performance-audit/implementation-parliamentary-committee-and-auditor-general-recommendations-department-of-finance> [accessed 5 September 2024].

In October 2023 Finance advised the ANAO that: ‘At the time of new Governance arrangements being established, Finance considered the Guidelines were clear on the inclusion of public relations as it relates to certification, and that clarifying it in guidance documents (available on the portal) was appropriate’. Finance has not provided guidance documents that meet the intent of the recommendation. ...

71 This change implemented Recommendation 1 in Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*.

Opportunity for improvement

2.30 Finance could review the appropriateness of the level of information relating to media partnerships, public relations and influencers provided as part of government review of advertising campaigns.

Authorisation and attribution of campaign materials

2.31 In 2022, Finance developed and circulated an information sheet regarding authorisations for advertising campaigns which states:

The *Commonwealth Electoral Act 1918*, the *Broadcasting Services Act 1992* and the *Referendum (Machinery Provisions) Act 1984* contain similar requirements relating to the authorisation of advertisements that contain electoral, referendum or political matter. This ensures that regulators and Australian voters know who is responsible for the statements contained in advertising and other materials.

Because of the broad definitions of electoral and political matters contained in these Acts, the Australian Government has adopted a convention of authorising its advertising campaigns to ensure they comply with these laws.⁷²

2.32 The information sheet provides specific instructions on what authorisation statements are to be included in different forms of advertisements and the form the statements should take. This applies to advertisements and campaign websites only. The information sheet does not specify requirements for media partnership content or public relations activities.

2.33 Finance has provided advice to entities on 'attribution' of entities' funding of, or contribution to, media partnership and influencer materials.⁷³ Finance advised Health in December 2023:

There are a few ways we could attribute content when/if using influencers or paid partnerships, it will depend on the platform used as well as the content design. Some ways that you can attribute include Sponsored by Australian Government or in Partnership with Australian Government or #Ad or #Sponsorship or #PaidPromotion. Of course, you can have the talent say it.

2.34 Finance advised AGD in January 2024:

due recognition is required in some form for media partnerships where the Government has contributed funding but doesn't have full control of the content. Usually an "in partnership with the Australian Government" or "brought to you by the Australian Government" is sufficient ...

2.35 Finance has referred entities to section 2.7 of the Australian Association of National Advertisers' Code of Ethics, which states:

Influencer and affiliate marketing often appears alongside organic/genuine user generated content and is often less obvious to the audience. Where an influencer or affiliate accepts payment of money or free products or services from a brand in exchange for them to promote that brand's products or services, the relationship must be clear, obvious and upfront to the audience and

72 As discussed in paragraph 4.72, the AEC has developed its own authorisation statement requirements for AEC campaigns.

73 'Attribution' is an acknowledgement of entity or Australian Government involvement in, and contribution to, campaign materials.

expressed in a way that is easily understood (e.g. #ad, Advert, Advertising, Branded Content, Paid Partnership, Paid Promotion). Less clear labels such as #sp, Spon, gifted, Affiliate, Collab, thanks to ... or merely mentioning the brand name may not be sufficient to clearly distinguish the post as advertising.

2.36 Greater consistency in advice could be achieved by Finance developing and issuing standardised guidance relating to attributions on media partnership, public relations and influencer materials.

Opportunity for improvement

2.37 Finance could develop guidance for entities on the attribution of media partnerships, public relations and influencer materials.

Brand safety

2.38 Finance manages brand safety risks with the assistance of the MMA, which at the time of this audit was UM. UM documentation states:

Brand safety refers to mitigating the risk of an advertiser's exposure to inappropriate content. This could be an ad published next to, before, or within an unsafe environment. In practice, this means avoiding placing ads next to inappropriate content.

2.39 Finance's contract with UM includes the following regarding brand safety:

- requirements for UM to use its best efforts to mitigate brand safety risks;
- a list of 'inappropriate content' that advertising should not appear alongside⁷⁴;
- requirements for UM to monitor and advise the relevant entity and Finance immediately if advertising appears alongside inappropriate content;
- requirements for UM and subcontractors to establish, maintain and review an exclusion list of websites and applications where advertising may and may not appear; and
- reporting requirements for third party verification monitoring, includes details on brand safety.⁷⁵

2.40 One of the service level agreements identified in the UM contract is that:

There are no significant or material instances of Advertising Services or Additional Advertising Services delivered to Customers that are not in accordance with Finance's and/or the Customer's brand safety requirements.

2.41 Finance advised the ANAO in August 2024 that 'There have not been any identified issues to warrant documentation or reporting of non-compliance with this service level.'

74 The contract in relation to MMA services for the Australian Government states that:

inappropriate content includes, but is not limited to, content featuring or promoting smoking, the use of alcohol or illegal drugs, gambling, hate speech, illegal downloading, offensive language, pornography, violence, or any illegal activities not specified. Political content must also be avoided, noting that the Commonwealth's advertising must be, and appear to be, objective and dissociated from any particular political party or party political interests.

75 Under the contract, Finance receives monthly reports from a third-party verification service that monitors digital media metrics that include viewability, invalid traffic and brand safety.

2.42 UM provides Finance with brand safety appraisals that assess brand safety risks associated with different digital platforms. This includes new and emerging platforms that have not hosted Australian Government advertising before and platforms for which brand safety concerns or incidents have previously arisen. The assessments present information from pilots undertaken in which brand safety controls and performance of platforms not currently used in government advertising have been tested. The brand safety appraisals provide UM's overall assessment on digital platforms, including recommendations for applications within platforms that are considered brand safe and those that are not.

2.43 Brand safety requirements for non-digital media are captured in the terms and conditions agreed with individual media outlets. Finance advised the ANAO in August 2024:

Brand safety risks are most prevalent in the digital space given its seemingly endless volume of user generated content. Given its relative risk profile, in comparison to more traditional forms of media that are subject to higher levels of industry scrutiny (e.g. content classifications, Broadcasting Services Act etc.), the level of emphasis on digital brand safety approaches is appropriate.

2.44 Entities making media placements through UM are asked for brand safety requirements specific to their campaigns.

Brand safety incidents

2.45 Evidence provided by Finance indicates that there was one brand safety incident during the audit period. In September 2022, Finance was alerted to a risk to brand safety for Australian Government advertising on the Twitter platform.⁷⁶ This related to the placement of advertisements on individual Twitter profiles that featured inappropriate content, as identified in the UM contract. UM provided Finance with advice on Twitter's response to the incident and which Australian Government campaigns were affected. UM's recommended response was to temporarily pause advertising on the platform and to cease advertising on Twitter search results⁷⁷ and profiles⁷⁸, to which Finance agreed.

Government advertising on TikTok

2.46 On 4 April 2023, AGD issued Protective Security Policy Framework Direction 001-2023 (the Direction), preventing the installation of TikTok on Government devices, unless a legitimate business reason exists. The Direction stated:

The TikTok application poses significant security and privacy risks to non-corporate Commonwealth entities arising from extensive collection of user data and exposure to extrajudicial directions from a foreign government that conflict with Australian law.

On advice from lead protective security entities, I have determined that the installation of the TikTok application on government devices poses a significant protective security risk to the Commonwealth. ...

76 In July 2023, Twitter's name was changed to 'X'.

77 This involves placing advertisements at the top of search results pages.

78 This involves advertisements being displayed on individuals' Twitter/X profiles.

Entities **must prevent** installation and remove existing instances of the TikTok application on government devices, unless a **legitimate business reason** exists which necessitates the installation or ongoing presence of the application.⁷⁹ [emphasis in original]

2.47 In May 2023, Finance provided advice to the Minister for Finance on potential implications of using TikTok for government advertising. Further advice was prepared in November 2023. On both occasions the advice related to the use of TikTok in government advertising, as the Direction did not address this.

2.48 In April 2024, Finance advised the ANAO that there was no official position on the use of TikTok for government advertising. The first non-corporate Commonwealth entity to place paid advertising on TikTok was Health in its Give up for Good campaign, which launched in June 2024.⁸⁰ Prior to this, entities have engaged with media partnerships and influencers who have used TikTok for campaign activities, including Health's Youth Vaping Education (phase one) campaign, which is discussed in Chapter 5 of this report.

Social media influencers

2.49 In August 2018, the government decided that social media influencers were not to be used in government advertising campaigns unless a compelling case and risk mitigation strategy was provided to the Service Delivery Committee of Cabinet (SDCC).⁸¹ This was in response to negative media attention relating to the use of social media influencers in campaigns administered by Health and the Department of Defence (Defence).⁸² In mid-August 2018, Finance advised Australian Government entities of the government's decision that 'with immediate effect, paid social media influencer strategies are not to be used in campaign advertising and/or related public relations activities'.

2.50 In March 2023, Finance prepared advice for government on the use of social media influencers in campaign advertising. The advice included proposed guidance documents for entities considering the use of social media influencers and vetting processes that entities could undertake. The submission containing the advice was not signed by the Minister for Finance. Finance advised the ANAO in May 2024 that:

GCS agreement, earlier this year [2024], to implement the youth vaping campaign (Health) which contained both the use of influencers and TikTok, signalled that these channels could be utilised for Australian Government campaign communications on a case-by-case basis.⁸³

79 The Direction 001-2023 (the Direction) also stated that 'This direction applies only to the TikTok application and does not restrict access to TikTok through the use of a web interface (for example, accessing through a website).'

80 Minister for Health and Aged Care, 'New supports to quit vaping and smoking', media release, 10 June 2024, available from <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/new-supports-to-quit-vaping-and-smoking?language=en> [accessed 22 July 2024].

81 The Service Delivery Committee of Cabinet was responsible for review and oversight of campaign advertising prior to the establishment of the Government Communications Subcommittee (GCS) (see Chapter 1 (Box 1) of this report).

82 See Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*, ANAO, Canberra, 2019, paragraphs 2.65–2.67, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019> [accessed 8 September 2024].

83 Health's use of influencers is discussed in Chapter 5. Use of TikTok is discussed in paragraphs 2.46–2.48.

2.51 Finance issued guidance on the use of social media influencers in campaigns in September 2024.⁸⁴ The guidance stated that:

By its nature, the use of social media influencers requires a willingness to engage with a level of risk in order to obtain the benefits of engagement that influencers can bring through their authenticity. Accordingly, the proposed use of social media influencers needs to be supported by a robust brand safety risk mitigation strategy to minimise any potential reputational damage to the Australian Government through association or alignment with controversial or inappropriate behaviour of nominated talent.

Thorough due diligence checks must be undertaken for proposed influencer talent. Checks, conducted by the department, public relations agency, or both, should be ongoing over the duration of the campaign. Consideration should be given to determining the appropriate frequency of checks (daily, weekly etc).

In particular, past social media posts and public activity should be reviewed to assess any potential reputational damage to the Australian Government through association or alignment with controversial or inappropriate online behaviour.

The use of artificial intelligence and emerging technologies

2.52 Outside of the government context, there has been increasing use of artificial intelligence (AI)⁸⁵ and emerging technologies in advertising, including in the development and distribution of advertising materials and analysis of related data.⁸⁶

2.53 In September 2024, the Digital Transformation Agency published the *Policy for the responsible use of AI in government*, which introduced mandatory requirements for non-corporate Commonwealth entities.⁸⁷ The policy states that it ‘provides a framework to position the Australian Government as an exemplar under its broader safe and responsible AI agenda.’⁸⁸ It established a requirement for entities to ‘designate accountability for implementing this policy to accountable

84 Prior to this guidance being issued, Finance advised entities on vetting social media influencers and referred entities using influencers to its ‘Guidance on the use of talent in Australian Government campaigns’, which does not specifically mention social media influencers or risks specific to their use in campaigns.

85 The Australian Government has adopted the Organisation for Economic Co-operation and Development’s definition of an ‘AI system’:

An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment.

See Digital Transformation Agency, *Policy for the responsible use of AI in government*, DTA, Canberra, 2024, available from <https://www.digital.gov.au/sites/default/files/documents/2024-10/Policy%20for%20the%20responsible%20use%20of%20AI%20in%20government%201.1.pdf> [accessed 18 November 2024].

86 See, for example D Thomas, ‘How AI is transforming the business of advertising’, *Financial Times*, 11 February 2024, available from <https://www.ft.com/content/0ac1fe79-4c2a-4030-8046-061293ba1127> [accessed 4 September 2024]; M Kovalenko, ‘AI’s Influence On The Programmatic Advertising Industry’, *Forbes*, 5 December 2023, available from <https://www.forbes.com/councils/forbestechcouncil/2023/12/05/ais-influence-on-the-programmatic-advertising-industry/> [accessed 9 September 2024]; S Grantham, ‘When it comes to political advertising, is AI ever OK?’, *The Conversation*, 24 July 2024, available from <https://theconversation.com/when-it-comes-to-political-advertising-is-ai-ever-ok-235323> [accessed 7 September 2024].

87 DTA, *Policy for the responsible use of AI in government*.

88 *ibid.*, p. 4.

official(s)⁸⁹ and ‘make publicly available a statement outlining their approach to AI adoption and use’.⁹⁰ The policy further states that entities should consider ‘Integrating AI considerations into existing frameworks’.⁹¹

2.54 Finance advised the ANAO in October 2024 that ‘Finance is not aware of the use of artificial intelligence in the production of final campaign materials’ and that guidance had not been provided to entities on the use of AI in advertising campaigns.

Recommendation no. 1

2.55 The Department of Finance develop supporting policy and guidance to identify and manage emerging risks, including to brand safety, relating to the use of artificial intelligence and emerging technologies in government advertising campaigns.

Department of Finance response: *Agreed.*

2.56 *Finance agrees the two recommendations directed to the Department and will take appropriate action to address the matters raised.*

Administration of mandatory procurement arrangements

2.57 Finance is responsible for managing the mandatory procurement arrangements relating to government advertising. This includes the MMA contract, the whole-of-government campaign evaluation contract and the GCCP.⁹² Use of these arrangements is mandatory for non-corporate Commonwealth entities, with exceptions for Defence Force Recruiting campaigns, which are not required to use the GCCP, and campaigns undertaken by the AEC, which is exempt from using the GCCP and the whole-of-government evaluation supplier.⁹³

2.58 Mandatory procurement arrangements with a sole supplier or a limited number of suppliers can make it difficult to demonstrate the achievement of value for money. This is particularly applicable where the suppliers are appointed following a limited tender process, which was the case for Hall & Partners⁹⁴ and the GCCP. Finance has implemented measures in the contractual arrangements with each supplier to mitigate risks relating to the achievement of value for money, which are outlined below.

89 *ibid.*, p. 11. The *Policy for the responsible use of AI in government* (policy) states that this must occur within 90 days of the policy taking effect from 1 September 2024.

90 *ibid.*, p. 13. The policy states that this must occur within six months of the policy taking effect from 1 September 2024.

91 *ibid.*, p. 16. ‘Related frameworks for AI’ are included at Attachment A to the policy. The advertising framework is not mentioned, however the policy states that the list ‘is not exhaustive. Agencies should consider what existing frameworks apply to them and their specific AI use cases.’

92 All advertising placed by non-corporate Commonwealth entities must be placed through the MMA. Use of the whole-of-government campaign evaluation contract and the GCCP are only mandatory for advertising campaigns with total budgets above \$500,000 (exclusive of GST).

93 See Chapter 1 (Box 2) of this report.

94 Hall & Partners is the whole-of-government evaluation supplier.

Master Media Agency services — Universal McCann

2.59 In 2018, Finance appointed Universal McCann (UM) as the sole supplier MMA for the period 1 July 2018 to 30 June 2021 following an open tender process.⁹⁵ The contract end date was extended in April 2021 with an end date of 30 June 2024. In May 2024, the contract was varied again to extend the end date until 30 September 2024.⁹⁶

2.60 Finance's contract with UM for the period 1 July 2018 to 30 June 2024 included an annual retainer and potential performance payments.⁹⁷ During the period 1 July to 30 September 2024 (second contract extension), Finance's contract with UM included a retainer but no performance payments.⁹⁸

Customer satisfaction assessment

2.61 During the audit period, three annual performance assessments of the contract were undertaken by a third-party contractor (Kantar Public, now known as Verian) via Customer Satisfaction Surveys. These were in November 2022, November 2023 and December 2024. The surveys assessed customer (entity) satisfaction with UM's performance in delivering campaign and non-campaign advertising and opportunities for improving service delivery.⁹⁹ UM's Customer Satisfaction Survey scores for 2021–22, 2022–23 and 2023–24 are presented in Table 2.1.

95 The contract with UM was reviewed in Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, Box 2, pp. 23–24 and 48–51. Finance records indicated the arrangement was established to optimise discounts for media rates by: consolidating government advertising expenditure and buying power; incorporating media planning placement and industry expertise to government advertising activities; reducing entities' procurement costs by avoiding the need for individual entities to establish and manage their own media procurement processes; and drive efficiencies by using advertising data to inform government decisions.

96 This variation is discussed further in paragraphs 2.65–2.72.

97 Performance payments were based on two assessments:

- Customer/entity satisfaction assessment derived from customer satisfaction surveys (with potential performance payments aligned to specified client satisfaction ratings); and
- Finance satisfaction assessments, derived from an audit of selected campaigns and media rates negotiations.

During the period July 2018 to April 2021, in addition to the requirements outlined above, the Finance satisfaction assessment included Finance evaluating the quality of services provided by UM.

98 The annual retainer ranged from approximately \$9.8 million to \$10.5 million (GST exclusive) over the life of the contract for the period 1 July 2018 to 30 September 2024.

99 Specific survey elements included:

- satisfaction levels at different stages of the advertising process, among groups with different customer characteristics, and with different characteristics of advertising;
- how well UM is performing against contracted requirements and service levels;
- the drivers of overall performance and how this relates to different stages of the advertising process, elements of service delivery, and customer characteristics; and
- areas UM needs to address to improve overall performance.

Table 2.1: Customer Satisfaction Survey results for the Master Media Agency/ Universal McCann

	2021–22	2022–23	2023–24
Overall customer satisfaction score out of 10	7.62	7.42	7.21
Performance rating ^a	Good	Average	Average

Note a: The relationship between overall customer satisfaction score and performance rating is based on the following scale:

Excellent	score of 8.50–10.00
Good	score of 7.50–8.49
Average	score of 6.00–7.49
Weak	score of 5.00–5.99
Poor	score of 0–4.99

Source: Finance documentation.

Finance satisfaction assessment

2.62 Finance’s contract with UM specifies third-party monitoring of performance and includes being subject to audits to verify UM’s annual negotiation of media rates to meet contractual requirements.¹⁰⁰ The UM contract also includes payment incentives for media rate saving outcomes achieved by UM during the annually conducted media rate negotiations with media suppliers.

2.63 Finance’s internal auditor¹⁰¹ is contracted to test the accuracy of the savings reported by UM and to assess UM’s quality assurance activities. The outcomes of these audits are reported to Finance’s Audit and Risk Committee. These audits have reported that media rate savings were achieved by UM in 2021–22, 2022–23 and 2023–24.

2.64 UM received annual performance payments in 2021–22, 2022–23 and 2023–24 based on:

- the customer satisfaction surveys conducted by Verian;
- confirmation by Finance’s internal auditor of media rate savings outcomes achieved by UM during media rate negotiations with media suppliers; and
- assessments by Ebiquity, Finance’s media adviser, of UM’s media buying performance.

Extension of contract with the Master Media Agency

2.65 As discussed in paragraph 2.59, Finance’s contract with UM commenced on 1 July 2018 and had an original end date of 30 June 2021, with a three year extension option, which would bring the end date to 30 June 2024 if the extension was exercised. In January 2021, Finance extended the UM contract to 30 June 2024. In May 2024, Finance varied the end date again, from 30 June 2024 to 30 September 2024, despite having already exhausted all extension options available under the contract. Finance documentation requesting approval for the variation stated:

100 A primary component of UM’s role is to facilitate an annual rate negotiation process with media suppliers and obtain the best possible rate positions and trading terms for advertising for the government.

101 During the period 1 July 2018 to 30 September 2023, Finance engaged KPMG for the provision of internal audit services. From 1 September 2023 to 31 August 2025, Finance engaged Axiom for the provision of internal audit services.

2. The MMA arrangement with UM expires on 30 June 2024 and all available extension options have been exercised. Subject to your approval of this proposed variation and extension, and agreement from UM, the arrangement will continue broadly under the same terms and conditions as the existing arrangement, and the new expiry will be 30 September 2024.

3. An extension to current arrangements is required as the MMA Tender process has been delayed.

4. The MMA Tender Team is finalising evaluation of the MMA Tender, which is scheduled to be completed June 2024. Original timeframe estimates were for the new MMA arrangement to commence 1 July 2024. Due to the scale and complexity, this timeframe is no longer achievable. As the procurement process for the new MMA arrangement is ongoing, continuity of the supply of services is essential.

...

6. The proposed variation and extension are consistent with Finance's procurement guidance relating to Contract End Dates, which states that a contract extension may be appropriate for the length of time that will allow for the procurement and/or implementation of a subsequent arrangement. In this case, a deed extension is appropriate to complete the procurement process and transition to a subsequent arrangement for MMA services.

7. The proposed variation and extension represent value for money as they:

a. minimise the risks associated with implementing the new MMA arrangement and allow time for a phased rollout approach for transition;

b. provide UM, as the incumbent provider, the commercial certainty to enable appropriate resource planning for the near future, which will help ensure entities receive adequate services during transition; and

c. allow entities to manage MMA services leading up to and during the transition to a potential new supplier, if required.

...

16. ... Procurement and Contracting has been consulted to confirm the proposed variation complies with procurement policy requirements.

2.66 Finance's procurement area obtained internal legal advice in relation to the extension.¹⁰² The advice noted that extension options under the UM deed had been taken up and there were no further extension options.

2.67 Finance and UM agreed to the variation in May 2024.

2.68 Finance's advice supporting the extension stated:

As discussed the current MMA extension is being sought in accordance with Finance procurement guidance on contract end dates.

Specifically it states that:

Extending a contract through variation

... As a general rule, contracts should only be extended for the length of time that will allow for the procurement and/or implementation of a subsequent arrangement (if needed), or provision of all deliverables under the original contract. For example, a contract extension may be appropriate to

102 Advice included in relation to the extension, the retainer, performance payments and transition out period.

complete a protracted procurement process and transition to a subsequent arrangement for goods and/or services. [emphasis in original]

2.69 The same Finance procurement guidance also states:

Contracts should not be extended by variation due to a failure to appropriately plan procurement needs, continue supplier relationships, or with the intention of discriminating against a supplier, avoiding competition, or to avoid obligations under the CPRs.¹⁰³

2.70 The Department of Finance's *Contract Management Guide* states:

You can only extend a contract if **all the following conditions are met**:

1. the contract contains an (unused) option to extend
2. it is value for money to extend the contract and
3. the contract has not yet expired.¹⁰⁴ [emphasis in original]

2.71 As discussed in paragraph 2.65, Finance documentation states the reason for needing an extension was due 'to the scale and complexity' of the procurement and that the planned timetable could not be achieved. Extending a contract after all extension options had been exercised due to delays in the completion of the tender process to establish a new contract for the provision of advertising services is inconsistent with Finance procurement guidance.¹⁰⁵

Recommendation no. 2

2.72 When planning future procurements for Master Media Agency services for Australian Government advertising, the Department of Finance provide sufficient time to enable the procurement process to be completed prior to exhausting all extension options available under the existing contract.

Department of Finance response: *Agreed.*

2.73 *Finance agrees the two recommendations directed to the Department and will take appropriate action to address the matters raised.*

Campaign evaluation provider — Hall & Partners

2.74 On 1 July 2018, Finance established a single supplier (Hall & Partners) to provide standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 (exclusive of GST) per financial year.¹⁰⁶ Hall & Partners costs are met by entities and Finance does not pay a retainer for these services.

103 Department of Finance, *Contract End Dates*, Finance, last updated 9 August 2023, available from <https://www.finance.gov.au/government/procurement/buying-australian-government/contracts-end-dates> [accessed October 2024].

104 Department of Finance, *Australian Government Contract Management Guide*, Finance, 2023, p. 41, available from <https://www.finance.gov.au/sites/default/files/2023-07/australian-government-contract-management-guide-july-2023.pdf> [accessed 7 November 2024].

105 Following an open tender released on 8 February 2024, Finance entered into a new contract with UM in September 2024 for the period 1 October 2024 to 30 June 2028 (not including potential extension periods). Arrangements relating to this contract are not in the scope of this audit.

106 The original arrangement was entered into on 1 July 2018 and in June 2020 was extended until June 2022. A new arrangement with Hall & Partners was entered into on 1 July 2022.

2.75 Finance held five review meetings with Hall & Partners during the audit period, in which Hall & Partners' performance was discussed, including contract administration, deliverables under the contract, effectiveness of the arrangement for the broader framework and engagement with the village process.¹⁰⁷ In May 2024, Finance approved extending the contract with Hall & Partners (SON3896690) to 30 June 2025. Advice to the delegate¹⁰⁸ regarding the contract extension noted that 'Finance concluded that Hall and Partners have continued to perform to a high standard.'

Government Communications Campaign Panel

2.76 As discussed in paragraph 2.13, the GCCP was established in March 2021 and was designed to support the village model of campaign development. The GCCP was established via a limited tender approach to selected suppliers on a multi-use list¹⁰⁹, known as the Campaign Advertising Supplier Register.¹¹⁰ GCCP suppliers are assigned to campaigns, which differs from most procurement panels under which entities are typically able to approach multiple suppliers to ensure the specific needs of the entity are met and value for money is achieved.

2.77 In March 2021, Finance provided advice to government regarding the establishment of the GCCP and the village model, stating that doing so would support a better practice approach to campaign development and implementation, and improve value for money outcomes.

2.78 In March 2024, the GCCP was extended until 30 June 2025. The brief recommending the extension of the panel arrangement contained a value for money assessment that referred to:

- work Finance had undertaken in auditing suppliers' compliance with fixed costs;
- data from 'client satisfaction ratings'¹¹¹; and
- improvements in campaign performance as measured through evaluation results.

2.79 Finance advised the ANAO in August 2024 that 'no specific audits have been undertaken on GCCP pricing beyond confirmation of the use of the appropriate costing templates.'

2.80 In 2023 and 2024, Finance conducted annual meetings with suppliers on the GCCP to discuss their performance. Finance documentation relating to the 2024 meetings shows that Finance provided feedback on the suppliers' performance in the village process and feedback relating to the campaigns suppliers work on.¹¹²

107 This included a review of post-campaign survey data relating to Hall & Partners performance (discussed in paragraphs 2.19–2.21).

108 The delegate for this procurement was the First Assistant Secretary, Enterprise Strategy Division.

109 A multi-use list (MUL) was a list of suppliers who had applied for inclusion on the list and satisfied a set of conditions for participation. The process of establishing a MUL did not involve the assessment of value for money. MULs are no longer used by the Australian Government.

110 The procurement process for establishing the GCCP was discussed in Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, paragraphs 1.19–1.23.

111 See the discussion on feedback from village stakeholders in paragraphs 2.19–2.21. The brief stated:
All suppliers were rated by departments as at least 5 out of 7 for value for money and standards of services, with the average rating being 5.4 out of 7 for value for money and 5.7 out of 7 for standard of services.

112 Finance provided records of meeting invitations sent to suppliers listing agenda items for the 2023 meetings; there was no documentation showing outcomes.

Does Finance reporting support transparency in relation to government advertising?

Finance has reported to the Parliament on annual media placement and associated campaign development expenditure by non-corporate Commonwealth entities, for campaigns with expenditure greater than \$250,000 (exclusive of GST), in its annual report on *Campaign Advertising by Australian Government Departments and Entities*. Details of expenditure relating to Finance’s contracts with the Master Media Agency and ICC members have not been included in these reports. Finance guidance does not address the publication of advertising campaign research reports which, under the 2022 Guidelines, must be published on entity websites ‘where it is appropriate to do so’ for campaigns with an expenditure of \$250,000 (exclusive of GST) or more.

Public reporting on Australian Government advertising expenditure

2.81 Since 2003, the Australian Parliament has required the executive government to table information on taxpayer funded advertising.¹¹³ As required by the 2020 and 2022 Guidelines¹¹⁴, Finance publicly reported on Australian Government campaign advertising expenditure in the annual reports on *Campaign Advertising by Australian Government Departments and Entities*, which were published on Finance’s website and tabled in the Parliament.¹¹⁵ The reports provide data on direct media placement and campaign development costs¹¹⁶ for advertising campaigns with expenditure greater than \$250,000 (exclusive of GST).

2.82 Each year, Finance provides a template for entities to complete and return, which collects information on campaign development costs. Finance advised the ANAO in August 2024 that ‘The accuracy of this data is ultimately the responsibility of the relevant entity.’¹¹⁷ Finance compiles media placement costs it obtains directly from the CAS.¹¹⁸ Details of expenditure relating to

113 See Auditor-General Report No. 7 2019–20, *Government Advertising: June 2015 to April 2019*, paragraph 2.40.

114 The same requirement was contained in the 2022 Interim Guidelines.

115 Reporting is on a financial year basis. Reports published during the audit period included:

Department of Finance, *Campaign Advertising by Australian Government Departments and Entities Report 2023–24*, Finance, 2024, available from <https://www.finance.gov.au/publications/annual-report-reports/campaign-advertising-australian-government-departments-and-agencies-report-2023-24> [accessed 29 January 2025].

Department of Finance, *Campaign Advertising by Australian Government Departments and Entities Report 2022–23*, Finance, 2023, available from <https://www.finance.gov.au/publications/reports/campaign-advertising-australian-government-departments-and-agencies-report-2022-23> [accessed 20 November 2024].

Department of Finance, *Campaign Advertising by Australian Government Departments and Entities Report 2021–22*, Finance, 2022, available from <https://www.finance.gov.au/publications/reports/campaign-advertising-australian-government-departments-and-agencies-report-2021-22> [accessed 20 November 2024].

116 Campaign development costs include: creative and production costs; market research (including benchmarking, tracking and evaluation costs); public relations; multicultural marketing; Aboriginal and Torres Strait Islander communications; printed materials and direct mail; and ‘other’ expenditure (such as sponsorships, merchandising and pitch fees). This information is provided on a per campaign basis.

117 In *Campaign Advertising by Australian Government Departments and Entities Report 2023–24* AGD and Health accurately reported to Finance whereas AEC did not, see paragraphs 4.36 and 4.39.

118 The Central Advertising System is the coordinated procurement arrangement for Australian Government advertising.

Finance’s contracts with the MMA and ICC members are not included in Finance’s annual campaign expenditure report.

2.83 From 2018–19, Finance has provided aggregated data on entities’ campaign development expenditure. The aggregated expenditure figure reflects the amount of Australian Government expenditure on government advertising in the reporting period. Table 2.2 reproduces key advertising related expenditure, as reported in the Finance report.

Table 2.2: Campaign advertising expenditure 2017–18 to 2023–24^a

Year	Media placement expenditure (\$ m)	Campaign development expenditure (\$ m)	Total (consolidated) (\$ m)
2023–24	173.8	76.6	250.6
2022–23	131.4	47.9	179.3
2021–22	239.6	99.6	339.2
2020–21	145.3	40.9	186.1
2019–20	127.9	28.9	156.8
2018–19	140.0	48.3	188.3
2017–18	157.0	46.1	203.1

Note a: Figures are rounded to one decimal place. Any discrepancies in tables between totals and sums of components are due to rounding. All figures in this table are exclusive of GST. Media placement expenditure figures are gross media spend. Consolidated data on campaign development costs is available on a financial year basis only. Figures relate to non-corporate Commonwealth entities under the PGPA Act.

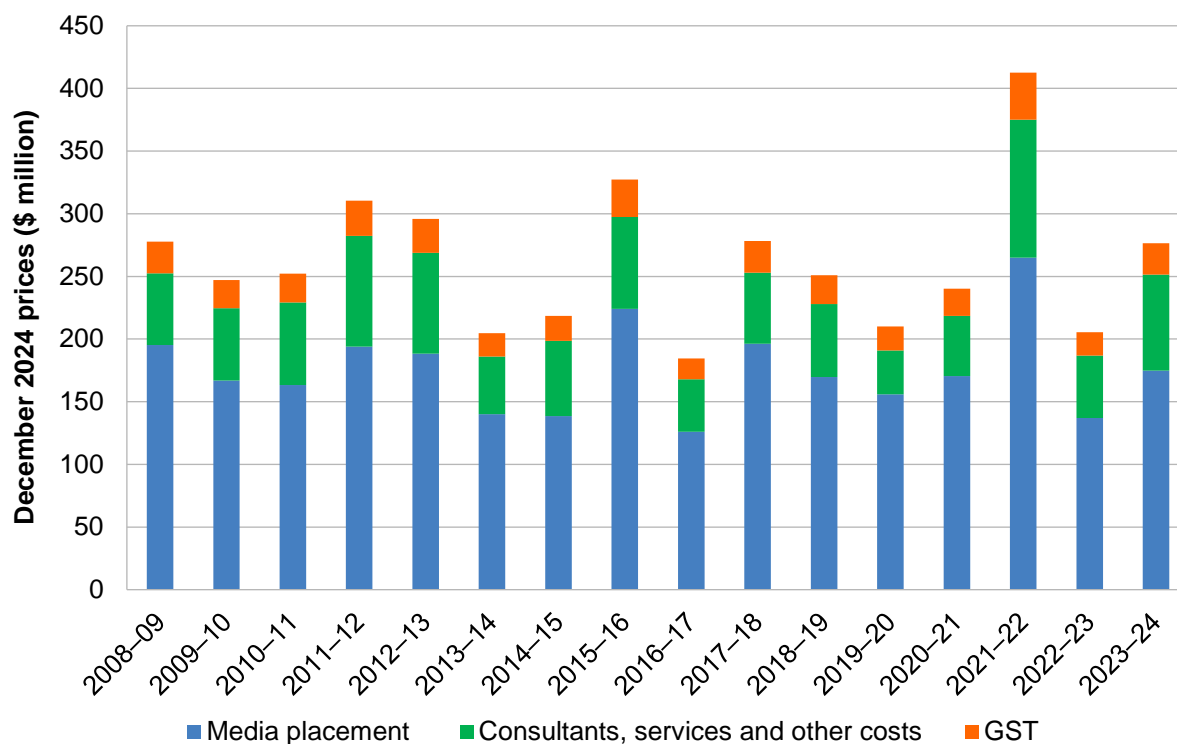
Source: Department of Finance, *Campaign Advertising by Australian Government Departments and Entities, Report 2023–24*, Finance, 2024, p. 47, available from <https://www.finance.gov.au/publications/annual-report-reports/campaign-advertising-australian-government-departments-and-agencies-report-2023-24> [accessed 4 February 2025].

Australian Government advertising expenditure over time

2.84 Reported campaign advertising expenditure from 2008–09 to 2023–24 for media placement, ‘consultants and services and other costs’ and GST, is shown in Figure 2.2.

2.85 Finance reported that in 2023–24, non-corporate Commonwealth entities spent \$173.8 million on media placement and \$76.6 million on ‘consultants, services and other costs’ (exclusive of GST). The combined total of these expenditures in 2023–24 was \$250.6 million (exclusive of GST).

2.86 Approximately \$4.19 billion (December 2024 prices, inclusive of GST) was spent on these components of campaign advertising over the 16 financial years reported in Figure 2.2, averaging \$262.02 million per financial year, adjusted for inflation.

Figure 2.2: Campaign advertising expenditure, 2008–09 to 2023–24, December 2024 prices^a

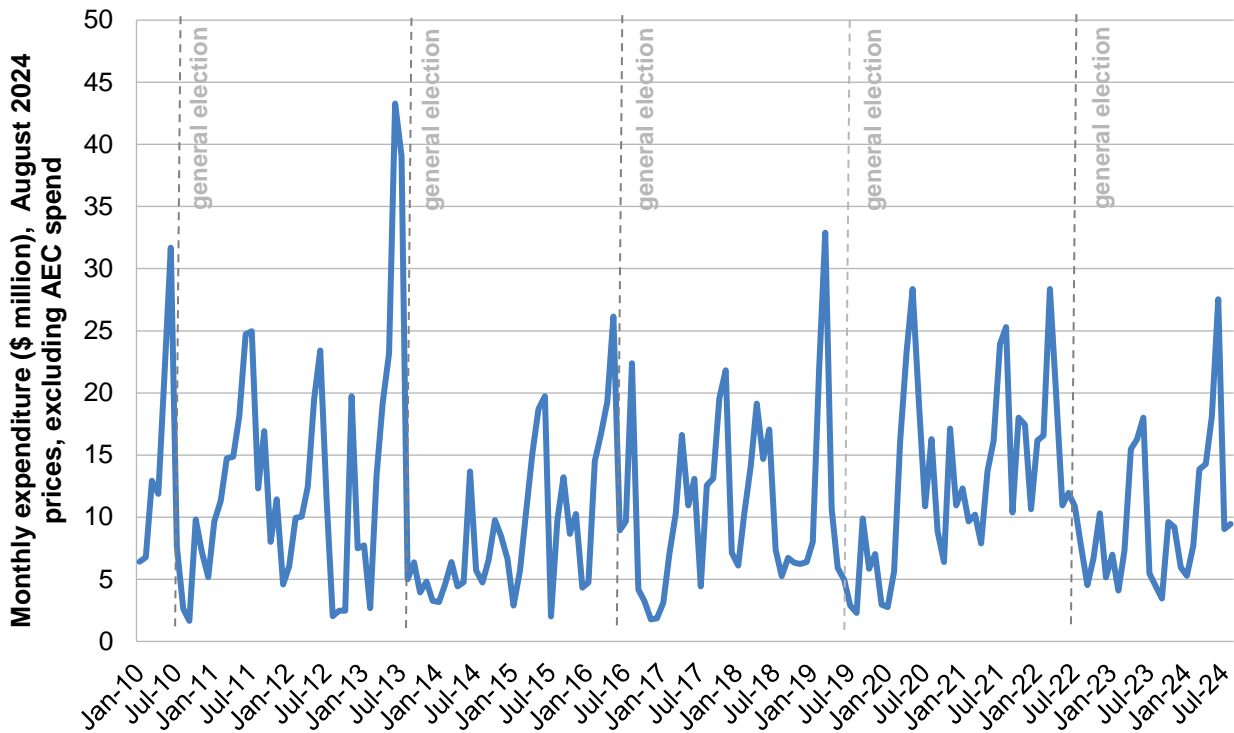
Note a: These figures do not include costs paid to the supplier for providing media placement services or the cost of the ICC.

Source: ANAO analysis of Finance's *Campaign Advertising by Australian Government Departments and Entities* reports based on Central Advertising System data, available from <https://www.finance.gov.au/publications/reports/advertising> [accessed 29 January 2025], using the Australian Bureau of Statistics Catalogue 6401.0 to adjust for changes in the consumer price index.

2.87 Previous ANAO audit reports have identified that media placement expenditure increased in the lead up to federal elections since 2004.¹¹⁹ Details of campaign expenditure on media placement from January 2010 are provided in Figure 2.3.

119 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, p. 45.

Figure 2.3: Campaign expenditure on media placement from January 2010 to August 2024, excluding AEC expenditure



Source: ANAO analysis of data provided from the Central Advertising System using Australian Bureau of Statistics Catalogue 6401.0 to adjust for changes in the consumer price index.

Reporting of Defence Force recruitment advertising expenditure

2.88 Auditor-General Report No.45 2023–24, *Defence’s Management of Recruitment Advertising Campaigns*, included a recommendation that:

The Department of Defence provide the Department of Finance with details of expenditure on individual Defence advertising campaigns for inclusion in Finance’s annual report on *Campaign Advertising by Australian Government Departments and Entities*.¹²⁰

2.89 Defence agreed to the recommendation. Finance advised the ANAO in August 2024 that ‘this is under consideration.’ Finance’s *Campaign Advertising by Australian Government Departments and Entities Report 2023–24* continued the practice of reporting consolidated Defence Force Recruiting campaign expenditure.

120 Auditor-General Report No.45 2023–24, *Defence’s Management of Recruitment Advertising Campaigns*, paragraph 2.100.

Publication of research reports

2.90 Paragraph 22 of the 2022 Guidelines states:

Accountable Authorities will ensure that:

- research reports for advertising campaigns with expenditure of \$250,000 exclusive of GST or more are published on their entity web site following the launch of a campaign where it is appropriate to do so; ...

2.91 Of the three entities undertaking campaigns reviewed in this audit¹²¹, AGD and Health published campaign research reports on their websites. The AEC did not document its consideration of whether the research for the selected campaign was appropriate for release.¹²² Similar findings were made in the 2022 ANAO Government Advertising Report.¹²³

2.92 Given the requirement in paragraph 22 of the 2022 Guidelines, accountable authorities should be making active decisions on whether to seek Ministerial permission for the publication of campaign related research for each campaign. Finance guidance does not address the publication of research reports.

Opportunity for improvement

2.93 Finance could review and update its guidance and templates to state that accountable authorities should document decisions regarding the appropriateness of publishing campaign related research.

121 The entities and campaigns assessed during this audit are listed in paragraphs 8 and 1.17.

122 See paragraph 4.37 for the AEC.

123 Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, paragraphs 3.20, 4.19 and 5.20.

3. One Talk at a Time campaign

Areas examined

This chapter provides an overview of the Attorney-General's Department's (AGD) Child Safety (One Talk at a Time) campaign and examines whether AGD complied with the Australian Government's campaign advertising framework (the framework) when undertaking the campaign.

Conclusion

AGD was largely compliant with the framework.

AGD's One Talk at a Time campaign largely complied with the review, certification and publication requirements of the framework.

AGD complied with the requirements of Principles 1 to 3 and largely complied with Principles 4 and 5 of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020 (2020 Guidelines). Campaign effectiveness was reduced by the delayed implementation of pre-launch public relations activities. Not all campaign materials contained appropriate attribution of Australian Government involvement and two procurements were not accurately reported on AusTender.

The advertising component of the campaign was evaluated, with the evaluation report finding that the campaign 'achieved' one objective and 'partially achieved' two objectives. At November 2024, an evaluation addressing other aspects of the campaign had not been undertaken as public relations activities were still underway.

Area for improvement

The ANAO identified two opportunities for improvement related to AGD reviewing its record management practices for campaign activities; and improving its review process of media partnership materials to ensure they contain appropriate attribution of AGD's involvement.

3.1 As a non-corporate Commonwealth entity conducting advertising and information campaigns, AGD is required to comply with the Australian Government's campaign advertising framework (the framework). To examine whether AGD complied with the requirements of the framework the ANAO assessed AGD's:

- processes for campaign review, certification and publication;
- compliance with the principles outlined in the Guidelines; and
- evaluation of the campaign's effectiveness.

Campaign overview

3.2 The report of the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)¹²⁴ was presented to the Governor-General on 15 December 2017. The report

124 Royal Commission into Institutional responses to Child Sexual Abuse, *Final report*, Royal Commission, Canberra, 2017, available from <https://www.childabuseroyalcommission.gov.au/final-report> [accessed 29 July 2024].

stated that ‘One of the reasons children might not disclose sexual abuse is that they feel there is no one they can tell.’¹²⁵ In response, the following recommendations¹²⁶ were made:

Recommendation 6.1

The Australian Government should establish a mechanism to oversee the development and implementation of a national strategy to prevent child sexual abuse. ...

Recommendation 6.2

The national strategy to prevent child sexual abuse should encompass the following complementary initiatives:

- a. social marketing campaigns to raise general community awareness and increase knowledge of child sexual abuse, to change problematic attitudes and behaviour relating to such abuse, and to promote and direct people to related prevention initiatives, information and help-seeking services

3.3 The National Office for Child Safety (NOCS)¹²⁷ and the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030* (National Strategy) were established in response to Recommendation 6.1 of the Royal Commission. The objective of the National Strategy states it ‘will reduce the risk, extent and impact of child sexual abuse and related harms in Australia’.¹²⁸ Measure 6 of the National Strategy’s First National Action Plan is to ‘Deliver a national awareness raising campaign on child sexual abuse’.¹²⁹

3.4 The Child Safety campaign, commonly referred to by its campaign slogan ‘One Talk at a Time’ (the campaign), was developed and administered by AGD to implement Recommendation 6.2 of the Royal Commission and Measure 6 of the National Strategy’s First National Action Plan.¹³⁰ On 22 October 2023, the campaign was launched, with advertising running until 30 June 2024¹³¹ and AGD advised the ANAO in January 2025 that public relations activities¹³² were anticipated to run until 30 April 2025.

125 Royal Commission into Institutional responses to Child Sexual Abuse, *Identifying and disclosing child sexual abuse Volume 4*, Royal Commission, Canberra, 2017, p. 36, available from <https://www.childabuseroyalcommission.gov.au/identifying-and-disclosing-child-sexual-abuse> [accessed 29 July 2024].

126 The Royal Commission into Institutional responses to Child Sexual Abuse report contained 409 recommendations in total.

127 The National Office for Child Safety (NOCS) was established on 1 July 2018 and is part of AGD.

128 National Office for Child Safety, *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*, NOCS, Canberra, 2021, p. 20, available from <https://www.childsafety.gov.au/resources/national-strategy-prevent-and-respond-child-sexual-abuse-2021-2030> [accessed 29 July 2024].

129 *ibid.*, p. 39.

130 Development of the campaign initially commenced under PM&C, with the responsibility being moved to AGD from 1 July 2022, resulting from a machinery of government change. Finance’s guidance states that:

A Machinery of Government (MoG) change, sometimes referred to as an Administrative Arrangements Order (AAO) change, follows a Prime Ministerial decision to abolish or create an entity, move functions or responsibilities between entities, or move functions into, or out of, the Australian Public Service. These changes may be documented in correspondence from the Prime Minister, or in orders issued by the Governor-General.

Department of Finance, *Machinery of Government Changes*, Finance, Canberra, 2024, available from <https://www.finance.gov.au/government/machinery-government-changes-guide> [accessed 4 February 2025].

131 AGD advised the ANAO in August 2024 that the advertising ceased on 30 June 2024.

132 For examples of public relations activities undertaken during the campaign, see paragraph 3.13.

3.5 The campaign was subject to the October 2020 version of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2020 Guidelines).¹³³ The campaign summary is at Table 3.1.

Table 3.1: Summary of the One Talk at a Time campaign^a

Campaign summary	
Objective	<p>The aim of the campaign is to ‘protect children and young people from sexual abuse by helping adults understand that child sexual abuse is preventable, and encouraging adults to have ongoing, proactive, preventative conversations.’</p> <p>The campaign states that it has three objectives to:</p> <ul style="list-style-type: none"> • help Australians to understand that having preventative conversations is the right thing to do and that these conversations make a real difference • build Australians’ knowledge and ability to have preventative conversations • increase Australians’ commitment to having preventative conversations.
Call to action	The campaign materials encouraged adults to have ongoing, proactive and preventative conversations with adults and young people about sexual abuse.
Timing	22 October 2023 to approximately 30 April 2025 ^b
Target audience	All adults who play an active role in the lives of children ^c
Campaign activities	Television, cinema, digital video, digital social, digital audio, digital search, culturally and linguistically diverse (CALD) media, First Nations media, content integration ^d and public relations activities
Total campaign budget (GST exclusive)	\$20.3 million
Total campaign expenditure (GST inclusive)	\$19.9 million
Media expenditure (GST inclusive)	\$13.8 million ^e
Supplier expenditure (GST inclusive)	<p>Total: \$6.2 million, including:</p> <ul style="list-style-type: none"> • Research — Kantar Public^f: \$1.5 million; • Creative — BMF: \$1.9 million; • Public Relations — Cox Inall Change: \$0.8 million; • Aboriginal and Torres Strait Islander communication — Carbon Creative: \$1.0 million; • Multicultural marketing — Cultural perspectives: \$0.7 million; and • Evaluation — Hall & Partners: \$0.3 million.

133 The differences between the 2020 Guidelines and 2022 Guidelines are discussed in paragraph 1.7.

Note a: Figures are rounded to one decimal place. Discrepancies between totals and sums of components is due to rounding.

Note b: AGD advised the ANAO in January 2025 that ‘The campaign has an anticipated end date of 30 April 2025’.

Note c: AGD advised the ANAO in August 2024 that the broad target audience includes the representation of the National Strategy priority groups (NSPGs). Six of the seven NSPGs involve adults: victims and survivors of child sexual abuse and their advocates; First Nations peoples; CALD communities; people with disability; LGBTQIA+ people; and people living in regional and remote communities. For more information on NSPG: NOCS, *National Strategy Advisory Group*, NOCS, Canberra, 2023, available from <https://www.childsafety.gov.au/what-we-do/engage-stakeholder-and-advisory-groups/national-strategy-advisory-group> [accessed 24 March 2025].

Note d: Content Integration included media partnerships with Mamamia and Southern Cross Austereo (see paragraph 3.13).

Note e: Media expenditure includes content integration.

Note f: Kantar Public is now known as Verian.

Source: ANAO analysis of AGD and Department of Finance documentation.

Campaign development and approval

3.6 In April 2021, the Department of the Prime Minister and Cabinet (PM&C) issued a circular to Commonwealth entities conducting campaigns for the preparation of items for consideration by the Service Delivery and Coordination Committee (SDCC).¹³⁴ Prior to initiating a campaign, with a budget of more than \$500,000 (inclusive of GST) per financial year, responsible ministers were required to seek authority from the Assistant Minister for Electoral Matters.

3.7 Development of the One Talk at a Time campaign was initiated under PM&C, where the responsible minister was the Special Minister of State, who was responsible for granting authority to initiate campaigns.¹³⁵ On 22 December 2021, the Special Minister of State sought approval from the Chair of the SDCC to proceed with the development of the campaign on the basis that the campaign was within the Special Minister of State’s portfolio responsibilities, meaning a potential conflict of interest.

3.8 The Chair of the SDCC provided approval to initiate the campaign on 24 January 2022 and assigned the campaign to the ‘Security Village’.¹³⁶

3.9 Developmental research was undertaken ‘across a full range of stakeholders’ by the research supplier (Kantar Public) and was completed in November 2022. The research stated that there was strong agreement from participants that ‘hearing from the Government about child sexual abuse would make me engage more with the topic’.¹³⁷

134 The 2022 update to the PM&C circular is discussed in Chapter 1 (Box 1) and paragraph 1.8.

135 At the time authority to initiate the campaign was sought, there was no Assistant Minister for Electoral Matters. Finance advised the ANAO in August 2024 that while the requirements were not updated to reflect the discontinuation of the Assistant Minister for Electoral Matters position, responsibilities previously held by that position transitioned to the Special Minister of State.

136 The ‘village model’ of campaign development is discussed in paragraph 1.9.

137 Verian, *National Child Safety Campaign Exploratory and Developmental Research Final Report*, Verian, 2023, p. 8, available from <https://www.childsafety.gov.au/resources/national-child-safety-campaign-exploratory-and-developmental-research-final-report> [accessed 26 February 2025].

Campaign funding

3.10 To implement Recommendation 6.2 of the Royal Commission and Measure 6 of the National Strategy’s First National Action Plan, as discussed in paragraphs 3.2 and 3.3, \$22.3 million was committed in the 2021–22 Budget.¹³⁸

Campaign materials

3.11 The campaign materials used in the One Talk at a Time campaign were advertisements, media partnerships and public relations materials, as outlined in Table 3.2.

Table 3.2: One Talk at a Time final campaign materials, by type^a

Advertisements	Media partnership materials	Public relations materials
6	21	41 ^b

Note a: For an outline of different types of campaign materials, see paragraph 2.22.

Note b: At November 2024, two of the public relations materials had not been released.

Source: ANAO analysis of AGD documentation.

3.12 The six advertisements consisted of four videos and two audio advertisements (see Figure 3.1).

3.13 The 21 media partnership materials were created in partnership with Southern Cross Austereo and Mamamia to target men and women respectively, by incorporating campaign messaging into podcasts, videos, radio segments and one article. The public relations materials included videos with ambassadors¹³⁹, educational resources¹⁴⁰ and posters.

Figure 3.1: Examples of One Talk at a Time campaign advertisements



Source: AGD.

138 Australian Government, *Budget Paper No. 2: Budget Measures 2021–22*, Commonwealth of Australia, Canberra, 2021, p. 174, available from https://archive.budget.gov.au/2021-22/bp2/download/bp2_2021-22.pdf [accessed 24 September 2024].

139 In this context, ambassadors refer to people with lived experience and subject matter experts on the issue of child sexual abuse.

140 Educational resources include: a song, a book, advertorials, a webinar recording, toolkits (information sheets) and partnerships with organisations to run child safety events.

Were the necessary review, certification and publication requirements undertaken?

AGD's One Talk at a Time campaign received government approvals in accordance with the framework requirements applying at the time it was considered.

The Secretary of the Attorney-General's Department (Secretary of AGD), as the accountable authority, certified that the campaign complied with all five principles of the 2020 Guidelines and the certification was published on AGD's website, as required. The Secretary's certification was informed by a third-party certification from the Independent Communications Committee (ICC), as required by the 2020 Guidelines, and AGD advice on compliance. AGD provided the Attorney-General with the signed Secretary's certification.

AGD complied with publication requirements, except for those relating to the statement in its 2023–24 annual report. AGD published its developmental research report on the One Talk at a Time campaign website.

Review by the Australian Government and Independent Communications Committee

3.14 In June 2023, the government reviewed the integrated communications strategy, media strategy, media plan, creative concepts, developmental research and concept testing research. The government agreed that the campaign proceed to further development and to book media placement.

3.15 On 20 July 2023, the ICC considered the campaign, as required by the 2020 Guidelines, and 'concluded that the proposed Child Safety campaign is capable of complying with Principles 1 to 4 of the Guidelines.'¹⁴¹

3.16 On 9 October 2023, the government reviewed the final advertising materials, and agreed to the campaign being launched. The use of media partnerships in the campaign was included as part of the media strategy at both government review points. No media partnership materials and only a small number of public relations materials had been developed by the time of final government review.¹⁴²

Secretary's certification

3.17 On 13 October 2023, AGD's Media and Communication Section and NOCS¹⁴³ submitted a certification pack to the Secretary of AGD seeking agreement to the Accountable Authority Certification Statement, as required by paragraph 19 of the 2020 Guidelines. The certification pack

141 Paragraph 19 of the 2020 Guidelines states:

The Independent Communications Committee will consider the proposed campaign and provide a report to the Accountable Authority on compliance with Principles 1, 2, 3 and 4 of the Guidelines. Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.

142 The public relations primer strategy, an outline of a public relations approach and an outline of the partnerships were included at the government reviews. At the time of the final government review on 9 October 2023, AGD had commenced implementing its public relations primer strategy. No public relations materials were included in the documentation provided for government review. These materials were not required to be reviewed at this stage of the GCS process.

143 NOCS is a branch within AGD.

included advertising materials, a Statement Against the Principles document, ICC compliance advice, legal and procurement advice, and policy advice from NOCS in order to satisfy all five principles under the Guidelines. Media partnership and public relations materials were not included in the Secretary's certification pack.¹⁴⁴

3.18 On 18 October 2023, the Secretary of AGD signed the certification and the One Talk at a Time campaign was launched on 22 October 2023.¹⁴⁵

3.19 AGD provided the Secretary's signed certification to the Attorney-General on 20 October 2023.

Publication processes

3.20 The 2020 Guidelines include the following publication requirements¹⁴⁶:

19. For advertising campaigns of \$250,000 or more:

...

- The Accountable Authority certification will be published on the relevant entity's website when the campaign is launched.
- The compliance advice of the Independent Communications Committee will be published on Finance's website after the campaign is launched. ...

22. Accountable Authorities will ensure that:

- research reports for advertising campaigns with expenditure of \$250,000 or more are published on their entity web site following the launch of a campaign where it is appropriate to do so; and
- details of advertising campaigns undertaken will be published in entity annual reports.

3.21 Specific requirements for publication of campaign information in entity annual reports are included in paragraph 17AH(1)(a) of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.¹⁴⁷

3.22 Table 3.3 outlines how AGD complied with the publication requirements, except for those relating to the statement in its 2023–24 annual report.

144 As with the final government review process (see paragraph 3.16), no media partnership materials and only a small number of public relations materials had been created at this time. In September 2024, Finance updated its guidance to clarify that certification requirements applied to both advertising and non-advertising activities, including public relations (see paragraph 2.28).

145 Attorney-General, 'National campaign launched to prevent child sexual abuse', media release, 22 October 2023, available from <https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22media%2Fpressrel%2F9433852%22> [accessed 8 August 2024].

146 The publishing requirements are identical to the publishing requirements in the 2022 Guidelines.

147 Subparagraph 17AH(1)(a)(i) of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) requires that entities that have undertaken advertising campaigns include in their annual reports:

a statement that "During [reporting period], [name of entity] conducted the following advertising campaigns: [name of advertising campaigns undertaken]. Further information on those advertising campaigns is available at [address of entity's website] and in the reports on Australian Government advertising prepared by the Department of Finance. Those reports are available on the Department of Finance's website."

Table 3.3: Compliance with publication requirements

For publishing	Complied
Secretary's certification ^a	●
ICC compliance advice ^a	●
Annual report ^b	● ^c
Publication of research reports ^d	●
<i>Campaign Advertising by Australian Government Departments and Entities Report 2023–24^e</i>	●

Key: ● AGD complied with the publication requirement.

● the requirement was largely met.

Note a: Paragraph 19 of the 2020 Guidelines.

Note b: Subparagraph 17AH(1)(a)(i) of the PGPA Rule and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.

Note c: In AGD's 2023–24 annual report, the campaign information was not presented in accordance with the requirements set out in the PGPA rule (see paragraph 3.23).

Note d: Paragraph 22 of the 2020 Guidelines.

Note e: Paragraph 21 of the Guidelines states that 'The Government will provide reports to the Parliament that detail expenditure on all advertising campaigns with expenditure in excess of \$250,000 commissioned by PGPA Act entities.' As discussed in paragraphs 2.81 to 2.82, Finance relies on information provided by entities that have undertaken advertising campaigns for this reporting.

Source: ANAO analysis of AGD information.

3.23 The Secretary's certification was published on AGD's website on 21 October 2023, the day before the campaign launched. The ICC's compliance advice was published on the Department of Finance's (Finance) website, as required by the 2020 Guidelines. AGD published details of the campaign in its 2022–23 and 2023–24 annual reports, although in the 2023–24 annual report AGD did not present the campaign information in accordance with requirements set out in the PGPA Rule as it did not include the required wording and did not provide a link to the AGD website.

3.24 AGD exploratory and developmental testing was published on AGD's website.¹⁴⁸ As stated in paragraph 3.20, the 2020 Guidelines refer to the publication of research reports for advertising campaigns with expenditure of \$250,000 or more where it is appropriate to do so. AGD did not seek government or minister approval before publishing the campaign research report.¹⁴⁹

148 NOCS, *National Child Safety Campaign Exploratory and Developmental Research – Final Report*, NOCS, Canberra, 2023, available from <https://www.childsafety.gov.au/system/files/2023-11/child-safety-research-report.pdf> [accessed 30 July 2024].

In the previous audit on government advertising, the ANAO discussed how publishing such reports enhance transparency. See Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, ANAO, Canberra, 2022, paragraph 2.17, available from <https://www.anao.gov.au/work/performance-audit/australian-government-advertising-may-2019-to-october-2021> [accessed 3 September 2024].

149 In response to the ANAO's finding regarding entities not publishing research reports in the previous audit of government advertising, the three entities involved explained that the reports were Cabinet-in-Confidence and that they needed written approval from the government to release research publicly. See Auditor-General Report No.17 2021–22, *Australian Government Advertising: May 2019 to October 2021*, paragraph 2.16. This is discussed further in paragraphs 2.90–2.93.

Were the principles of the framework adhered to?

AGD complied with Principles 1 to 3 of the 2020 Guidelines and largely complied with Principles 4 and 5.

For Principle 4, campaign effectiveness was reduced by the delayed execution of pre-launch public relations activities. For Principle 5, 17 of the 21 media partnership materials had appropriate attribution statements noting Australian Government involvement and two of the campaign procurements were not accurately reported on AusTender.

3.25 The five principles entities must comply with when undertaking campaigns, are listed in paragraph 1.3 of this report. The 2020 Guidelines provide information under each of the principles to illustrate how entities can demonstrate compliance.¹⁵⁰ This information is framed as ‘considerations,’ which could evidence compliance with the principles.

Principle 1 — Relevant to government responsibilities

3.26 In the 2020 Guidelines, one of the ‘considerations’ for demonstrating compliance with Principle 1 is that: ‘The subject matter of the campaign directly relates to the Government’s responsibilities’. When the campaign commenced, the applicable Administrative Arrangements Order stated that the ‘National child protection policy and strategy’ was the responsibility of PM&C.¹⁵¹ With a machinery of government change¹⁵², responsibility was moved to AGD.¹⁵³

3.27 The Statement Against the Principles prepared by AGD’s Media and Communication Section and NOCS stated that the campaign’s intent was to ‘disseminate crucial safety information to the Australian public ...’. This was consistent with the examples of suitable uses for government campaigns listed in the 2020 Guidelines.

Principle 2 — Presented in an objective, fair and accessible manner

3.28 In the 2020 Guidelines, there are seven ‘considerations’ for demonstrating compliance with Principle 2, which cover campaign content, accessibility of campaign materials and campaign testing.

Campaign content

3.29 The 2020 Guidelines describe the four ‘considerations’ for demonstrating compliance with the campaign content element of Principle 2¹⁵⁴:

26. The recipients of the information can distinguish between facts, comment, opinion and analysis.

27. Information presented as a fact, is accurate and verifiable.

150 See paragraph 12 for interpretation and paragraphs 23–44 for the five principles in the October 2020 Guidelines.

151 Administrative Arrangement Order signed by the Governor-General on 4 April 2019.

152 Machinery of Government changes are discussed in footnote 130.

153 The executive responsibility was renamed ‘National child sexual abuse policy and strategy’ in the Administrative Arrangement Order signed by the Governor-General on 13 October 2022 and in force from 14 October 2022.

154 The content in this section relates to the 2020 Guidelines, which is identical to the 2022 Guidelines.

28. The basis of factual comparisons is clear and does not mislead the recipient about the situation,

29. Pre-existing policies, products, services and activities are not presented as new.

3.30 As discussed in paragraph 3.17, NOCS policy advice was provided as part of the Secretary's certification pack. NOCS stated that 'The National Office supports certification of the campaign and confirms that the messaging used in the campaign is factual, accurate and verifiable, and is not deceptive or misleading.' The ANAO reviewed all advertising materials and assessed them to be compliant with the objectivity requirements of Principle 2.

3.31 As outlined in paragraphs 3.16 and 3.17, media partnerships and public relations materials were not reviewed as part of the government approval process and the Secretary's certification. For media partnership and public relations materials, the ANAO assessed whether AGD had implemented a review process to ensure media partnership and public relations materials met the objectivity requirements of Principle 2.

3.32 AGD did not have a documented process for reviewing media partnership materials prior to their publication.¹⁵⁵ AGD advised the ANAO in September 2024 that 'partnership and PR materials were reviewed by both Strategy and Governance Branch and [the] National Office of Child Safety, with EL2 [Executive Level 2] approval being provided from both teams.' AGD documentation indicates that 20 of the 21 media partnership materials (95 per cent) were reviewed by NOCS, with final approval by NOCS documented for 12 of the 21 materials (57 per cent). AGD's Strategy and Governance Branch reviewed 20 of the 21 media partnership materials (95 per cent) with approval documented for one of the 21 partnership materials (5 per cent).

3.33 AGD entered into arrangements with the public relations suppliers that included requirements for AGD to review materials. There was evidence of review of all published materials and approval of 38 of the 39 (97 per cent) public relations materials by NOCS.¹⁵⁶ AGD advised the ANAO in September 2024 that it was 'Unable to locate email[s] with approval' from the Strategy and Governance Branch.

Opportunity for improvement

3.34 AGD could improve its record management practices for campaign activities to ensure it complies with its legal obligations and supports effective corporate governance, accountability and performance.

Accessibility of campaign materials

3.35 The 2020 Guidelines describe the two 'considerations' for demonstrating compliance with the accessibility of campaign materials element of Principle 2.¹⁵⁷

30. Special attention is paid to communicating with any information disadvantaged individuals or groups identified as being within the target audience. Particular attention is paid to meeting the information needs of Indigenous Australians, the rural community and those for whom English is not a convenient language in which to receive information.

¹⁵⁵ AGD's Media and Communication Section is part of Strategy and Governance Branch.

¹⁵⁶ At November 2024, two public relations materials had not been published.

¹⁵⁷ The content in this section differed slightly to the 2022 Guidelines. Paragraph 25 in the 2022 Guidelines in regard to imagery includes 'and people with disability'.

31. Imagery used in campaigns appropriately reflects the diverse range of Australians. Where it is consistent with the campaign objectives, this includes the realistic portrayal of the full participation of women, Indigenous and culturally and linguistically diverse communities.

3.36 The main campaign target audience was ‘All adults who play an active role in the lives of children’, with specific targeting undertaken for adult cohorts from the National Strategy priority groups (NSPG).¹⁵⁸ AGD addressed the communications needs of these audiences by including:

- ‘broad reach media’ (including television, cinema, digital video and digital social channels) to reach as many adults as possible;
- media channels and public relations activities tailored to Aboriginal and Torres Strait Islander audiences (see paragraph 3.51);
- placement of advertising translated into Mandarin, Vietnamese, Arabic, Cantonese and Korean on national TV networks to ‘drive mass reach’. The campaign website contained selected resources translated into Arabic, Chinese, Farsi, Hazaragi, Khmer, Korean, Punjabi, Thai and Vietnamese¹⁵⁹; and
- regional and rural television and regional cinema media channels.¹⁶⁰

3.37 AGD sought to meet the information needs of people with disability through accessible communications, including the use of closed captioning on digital videos and easy read versions of public relations materials. AGD advised the ANAO in July 2024 that it used non-gendered language in communication products and had LGBTQIA+ representation in public relations content.

3.38 The Statement Against the Principles prepared by AGD’s Media and Communication Section and NOCS stated ‘Campaign creative will be diverse, but without targeting or overrepresenting any one population including to avoid stigmatising any particular population group.’ The four video advertising materials contained imagery of people.¹⁶¹ AGD advised the ANAO in September 2024 that ‘The final campaign cast includes 4 females and 2 males. It also includes 2 individuals representing CALD communities and 2 First Nations-appearing individuals.’ Reflecting people with a disability was not a requirement of the 2020 Guidelines.

3.39 AGD took steps to ensure the development of campaign materials was trauma informed, which was achieved through consultation with NOCS and the National Strategy Advisory Group.¹⁶²

Campaign testing

3.40 The 2020 Guidelines state that the ‘considerations’ for demonstrating compliance with the campaign testing element of Principle 2 is that:

32. Campaigns are tested with target audiences to indicate they are engaging and perform well against their objectives.

158 See note c to Table 3.1, which lists the National Strategy priority groups that involve adults.

159 Languages selected were those with the highest number of speakers with low English language proficiency based on 2021 Census data.

160 AGD advised the ANAO in August 2024 that language and content used was inclusive and accessible and scenes from the advertising materials were deliberately chosen to be ambiguous settings that could be found across Australia.

161 The two other advertisements contained audio only.

162 The National Strategy Advisory Group is comprised of child safety experts, advocates and representatives of the National Strategy’s priority groups.

3.41 The One Talk at a Time campaign underwent concept testing to determine its effectiveness. The research supplier allocated under the village model (Kantar Public) undertook three phases of concept testing. All advertising materials were recommended for progression. Kantar Public also undertook post-production testing, assessing that the advertising materials were ‘understood’ and that the campaign ‘successfully communicates the intended message - that having proactive conversations to prevent child sexual abuse is the right thing to do.’

Principle 3 — Objective and not directed at promoting party political interests

3.42 The 2020 Guidelines describes two ‘considerations’ for demonstrating compliance with Principle 3¹⁶³:

34. Language used in the campaign is objective language and is free of political argument.

35. Campaigns must not try to foster a positive impression of a particular political party or promote party political interests.

3.43 The 2020 Guidelines also state that:

36. Campaigns must not:

- a. mention the party in Government by name;
- b. directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
- c. include party political slogans or images;
- d. be designed to influence public support for a political party, a candidate for election, a Minister or a Member of Parliament; or
- e. refer or link to the web sites of politicians or political parties.

3.44 The Statement Against the Principles stated that ‘Preventing and responding to child sexual abuse is a non-partisan social issue that all Australians have responsibility for.’ It also stated that the One Talk at a Time slogan ‘makes no mention of a particular political party, issue or policy and aims to make Australian adults feel empowered to start a conversation with the children, young people and adults in their life.’

3.45 The final advertising materials for the One Talk at a Time campaign were compliant with Principle 3. Part of the arrangement with the whole-of-government Master Media Agency (Universal McCann (UM)) was to avoid the placement of campaign content alongside political content.¹⁶⁴ As discussed in paragraphs 3.32 and 3.33, there was evidence that AGD reviewed some media partnership and public relations materials prior to their distribution.

163 The content in this section relates to the 2020 Guidelines, which is identical to the 2022 Guidelines.

164 See paragraphs 2.38–2.44 for a discussion of UM’s role in ensuring brand safety for Australian Government campaigns.

Principle 4 — Justified and undertaken in an efficient, effective and relevant manner

3.46 The 2020 Guidelines describe the five ‘considerations’ for demonstrating compliance with Principle 4¹⁶⁵:

38. Campaigns are only instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence.

39. Campaign information clearly and directly affect the interests of recipients.

40. The medium and volume of the advertising activities is cost effective and justifiable within the budget allocated to the campaign.

41. Distribution of unsolicited material should be carefully controlled.

42. Campaigns are evaluated to determine effectiveness.

3.47 For the One Talk at a Time campaign there was evidence of:

- a documented justification (see paragraphs 3.2 to 3.4) and identification of target recipients (see Table 3.1);
- research activity, such as market research, concept testing and creative testing (see paragraphs 3.9 and 3.41); and
- campaign information (campaign materials) was directed to the interests of the identified recipients (see paragraph 3.36).

3.48 With respect to campaign cost-effectiveness, AGD received and followed advice from UM regarding the placement of advertising materials and media partnerships.

3.49 AGD received advice from the public relations supplier (Cox Inall Change) on a public relations primer strategy scheduled to run prior to the launch of the campaign. The strategy’s purpose was to:

build the foundation of information, and resources for the target audience and media. It will give victims and survivors and their advocates time to adjust to increasing communication about child sexual abuse.

3.50 AGD documentation indicates the primer strategy was to be implemented from August to October 2023. Two of the five primer materials were not delivered in the stated timeframe, thereby reducing AGD’s ability to introduce the topic of child sexual abuse in advance of increased communications, following the campaign launch on 22 October 2023.¹⁶⁶ This reduced the effectiveness of the primer strategy for the campaign.

3.51 In the Statement Against the Principles there was a specific reference to ‘a public relations approach with Aboriginal and Torres Strait Islander advocates to support participation and amplify messages.’ The Aboriginal and Torres Strait Islander supplier (Carbon Creative) held ‘yarning circles’ to determine which resources would be the most useful and effective.¹⁶⁷

165 The content in this section relates to the 2020 Guidelines, which is identical to the 2022 Guidelines.

166 The primer materials released after August to October 2023 were ‘How to build a safety network’ (released on 16 May 2024) and ‘Safe Search’ (released on 6 June 2024).

167 Yarning circles are a conversational process, in this instance with stakeholders, to learn and collaborate.

3.52 AGD had appropriate controls in place to prevent the distribution of unsolicited materials. As part of its public relations approach, the multicultural supplier (Cultural Perspectives) undertook electronic direct mail¹⁶⁸ marketing, and the public relations supplier (Cox Inall Change) created a stakeholder kit¹⁶⁹, which included directions on how to share campaign materials. AGD advised the ANAO in July 2024 that for the distribution of both materials, controls included curated distribution lists and the option for recipients to unsubscribe, at any time.

3.53 The final consideration for Principle 4 is the campaign evaluation, which is discussed in paragraphs 3.63 to 3.71.

Principle 5 — Compliant with legal requirements and procurement policies and procedures

Legal requirements

3.54 Principle 5 of the 2020 Guidelines state¹⁷⁰:

43. The manner of presentation and the delivery of campaigns must comply with all relevant laws including:

- a. laws with respect to broadcasting and media;
- b. privacy laws;
- c. intellectual property laws;
- d. electoral laws;
- e. trade practices and consumer protection laws; and
- f. workplace relations laws.

3.55 Paragraph 19 of the 2020 Guidelines states¹⁷¹:

Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.

3.56 AGD provided advertising materials to the Australian Government Solicitor (AGS)¹⁷² and sought legal advice in regard to compliance with the laws referred to in Principle 5 to inform the Secretary's certification. AGS was only provided with advertising materials, not media partnership or public relations materials. The AGS legal advice was provided to the Secretary of AGD with the certification minute to demonstrate legal compliance with Principle 5 of the 2020 Guidelines, before the launch of the campaign. AGD stated in the certification minute that 'AGS provided advice certifying that the campaign complies with relevant legal requirements' and explained how

168 Electronic direct mail (EDM) marketing is material sent via email. In this case, suggested social media posts to guide communications and encourage posts that aligned with the One Talk at a Time campaign messaging were sent to stakeholders including organisations that support culturally and linguistically diverse (CALD) audiences.

169 The stakeholder kit had information about the campaign and key messages, tools and resources, social media tiles, and information on how campaign materials could be shared and promoted.

170 The content in this section relates to the 2020 Guidelines, which is identical to the 2022 Guidelines.

171 *ibid.*

172 Australian Government Solicitor (AGS) is a group within AGD and provides legal services to the Australian Government.

recommendations in the legal advice were addressed by AGD.¹⁷³ In March 2024, AGD sought further legal advice relating to contracts for selected public relations activities.

3.57 AGS recommended that all materials contain appropriate authorisations consistent with the guidance on authorisations from Finance. For media partnership campaign material, Finance advised AGD in January 2024 that:

due recognition is required in some form for media partnerships where the Government has contributed funding but doesn't have full control of the content. Usually an 'in partnership with the Australian Government' or 'brought to you by the Australian Government' is sufficient ...

3.58 All six advertising materials had satisfactory authorisations and 17 of the 21 media partnership materials had satisfactory attributions.¹⁷⁴ Four media partnership materials had no attribution.¹⁷⁵

Opportunity for improvement

3.59 AGD could improve its review process for media partnership materials to ensure they contain the appropriate attribution of the department's involvement, consistent with Finance's guidance.

Procurement policies and procedures

3.60 Paragraph 44 of the 2020 Guidelines states that:

Procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers are to be followed, and there must be a clear audit trail regarding decision making.

3.61 The campaign was assigned to the 'Security Village'¹⁷⁶, which consists of the suppliers listed in Table 3.4, in addition to UM and the whole-of-government evaluation supplier (Hall & Partners).

Table 3.4: Suppliers in the 'Security Village'

Research	Creative	Public relations	Aboriginal & Torres Strait Islander communications	Multicultural communications
Kantar Public ^a	BMF	Cox Inall Change	Carbon Creative	Cultural Perspectives

Note a: Kantar Public is now known as Verian.

Source: Department of Finance documentation.

3.62 AGD completed sole source procurements with the suppliers in the 'Security Village', as mandated by Finance under the village model. For each procurement, the ANAO assessed AGD's

173 The recommendations from AGS related to: ensuring the accuracy of campaign statements; campaign materials including Australian Government authorisations; compliance with Privacy laws; and complete evidence of signed talent release forms to not infringe intellectual property laws.

174 The distinction between authorisations and attributions is discussed in paragraph 2.31–2.37.

175 The four partnership materials that had no attribution included a direction to the One Talk at a Time website, which was inconsistent with Finance's advice.

176 The village model is discussed in paragraphs 1.9 and 2.13–2.18.

compliance against selected requirements of the Commonwealth Procurement Rules (CPRs).¹⁷⁷ AGD did not report contract variations correctly on AusTender for two of the eight procurements.¹⁷⁸ All other procurements were assessed as compliant.

Was the campaign evaluated to determine its effectiveness?

Advertising components of the One Talk at a Time campaign were evaluated to determine their effectiveness. This evaluation identified that the advertising component of the campaign ‘achieved’ one objective and ‘partially achieved’ two objectives. At November 2024, the planned integrated evaluation of all campaign components, including media partnerships and public relations, had not been completed.

The performance of the campaign was monitored against media metrics, including key performance indicators (KPIs). AGD received in-flight monitoring of the campaign’s performance, including a mid-campaign report and a final media performance report.

3.63 The 2020 Guidelines require that ‘campaigns are evaluated to determine effectiveness’ and the PM&C circular (see paragraph 1.8) sets out expectations regarding the timeliness of evaluation.

3.64 AGD contracted Hall & Partners to provide an evaluation of the campaign. Hall & Partners provided a benchmark report, four bursts of in-flight evaluations and a final evaluation. This evaluation did not address the evaluation of media partnership or public relations materials. AGD advised the ANAO in August 2024 that the Hall & Partners final evaluation report would form one part of the AGD final integrated evaluation report, which will be completed in 2025, once all public relations activities have been completed.¹⁷⁹

3.65 The three objectives of the One Talk at a Time campaign were to:

- help Australians to understand that having preventative conversations is the right thing to do and that these conversations make a real difference
- build Australians’ knowledge and ability to have preventative conversations
- increase Australians’ commitment to having preventative conversations.

3.66 The Hall & Partners evaluation report identified that the second listed objective was achieved and that the first and third listed objectives were ‘partially achieved’.¹⁸⁰ The report determined whether the campaign met its objectives based on whether the results were

177 The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days. These requirements were consistent in the versions of the Commonwealth Procurement Rules (CPRs) in place at the time of the procurements (this includes versions updated on 1 July 2022, 13 June 2023 and 1 July 2024).

178 The BMF contract variation (CN3943860-A1) value and start date did not match AusTender reporting and the Kantar Public contract variation (CN3865108-A2) start date did not match AusTender reporting.

179 Integrated evaluations are undertaken by all members of the village to assess all components of a campaign.

180 These Hall & Partners evaluation report outcomes were based on advertising (videos shown on TV, online or cinema, digital audio and content [videos] on social media). As discussed in paragraph 3.64, AGD advised the ANAO in August 2024 that an integrated evaluation including advertisements, media partnerships and public relations activities is scheduled to be undertaken in 2025.

five per cent above the baseline level. The report included data on parents/carers, influencers¹⁸¹, Aboriginal and Torres Strait Islander audiences and CALD audiences.

3.67 The Hall & Partners evaluation report stated that ‘Among the mainstream audiences there were some improvements in key attitudes, perceptions and behaviours, which were, at least in part, driven by the campaign’ and that ‘There was a sense the campaign was successful in delivering its key messages’. The evaluation report concluded that the campaign delivered ‘key messaging around the importance of having preventative conversations about child sexual abuse’ and ‘Future activity should consider utilising a similar approach’.¹⁸²

Monitoring against media metrics

3.68 UM undertook monitoring of the media metrics of this campaign, including:

- a mid-campaign report dated 12 January 2024;
- moderation and sentiment reports¹⁸³; and
- a final media performance report.

3.69 The mid-campaign report provided metrics on the performance of the advertisements across media channels. The report contained five recommendations requiring a response from AGD. These related to:

- using image extensions to increase visibility of the advertisements;
- incorporating additional keywords to the word search structure;
- bidding higher on performing keywords¹⁸⁴;
- shortening the duration of videos for social media; and
- creating an additional creative variation of the top performing video.

3.70 AGD advised the ANAO in August 2024 that ‘The [image extension] and the word search/search structure were implemented’. AGD was unable to provide evidence that the change to the search structure was implemented. The recommendation to create a shortened video asset was noted but not addressed and AGD provided no evidence of the recommendations to bid higher on performing keywords or an additional creative variation being considered.

181 Defined as adults that have influence over the lives of children and young people, such as coaches, mentors and siblings aged over 18 years.

182 These Hall & Partners evaluation report conclusions are for advertisements (videos shown on TV, online or cinema, digital audio and content [videos] on social media) and do not represent the final conclusions of the integrated evaluation.

183 Moderation reports reported on the comments left on social media advertising placements, with reporting on the actions that UM took to address comments. Sentiment reports reported on the social media reactions (for example, likes) to the social media advertising placements.

184 AGD advised the ANAO in November 2024 that ‘Bidding higher means to increase the price you are willing to pay each time your ad is clicked to ensure the campaign is prioritised against other competitors with similar keywords’.

3.71 The final media performance report included data on the performance of the advertising and media partnerships against KPIs. The report included key learnings for the campaign¹⁸⁵ and recommendations specific to different communication channels for consideration for any future campaign phases.

185 Key learnings included highlighting the success of using media partners who were competitors, the need for improved social media advertisements and the better performance of the 30 second advertisements compared to the 60 second advertisements.

4. Your Answer Matters campaign

Areas examined

This chapter provides an overview of the Australian Electoral Commission's (AEC) 2023 Referendum (Your Answer Matters) campaign and examines whether AEC was compliant with its internal requirements and the intent of the Australian Government's campaign advertising framework (the framework) when undertaking the campaign.

Conclusion

The AEC has largely complied with its internal requirements and the intent of the framework. Since 2009, the AEC has had an exemption from most aspects of the framework and has committed to complying with the intent of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, December 2022 (2022 Guidelines). Documentation capturing the AEC's requirements for campaign development and certification, known as 'AEC communication campaigns: Guidelines and mandatory checklist' (AEC Guidelines), was in draft and there was no documented approval.

The AEC's Your Answer Matters campaign largely complied with the review and publication requirements. Publication requirements were met, although AEC did not publish campaign research reports, did not document consideration of whether doing so was appropriate and there were inaccuracies in the reporting of campaign expenditure figures in the AEC annual report and subsequent reporting to the Department of Finance.

The AEC complied with Principles 1 to 4 of the 2022 Guidelines and largely complied with Principle 5. Legal advice addressing all legal requirements of Principle 5 was finalised after the campaign had commenced. The AEC's requirements for attribution of AEC contribution to media partnerships and public relations materials was not documented.

The AEC evaluated the campaign with the evaluation report finding that of the total 23 objectives, 16 were 'met', six were 'partly met' and one was 'not met'.

Areas for improvement

The ANAO made one recommendation aimed at the AEC enhancing its internal requirements for campaign development and certification. Specifically, by requiring legal advice regarding compliance with Principle 5 be provided prior to campaign certification and establishing version control and documenting approval for the AEC Guidelines.

The ANAO identified four opportunities for improvement for the AEC. These relate to: updating the AEC Guidelines to reflect the roles of the Electoral Commissioner and Executive Leadership Team in campaign review; documenting its consideration regarding the publication of research reports for advertising campaigns; accurately reporting public campaign advertising information; and developing guidance on attribution requirements for media partnerships and public relations materials.

4.1 The AEC states that its purpose is to 'maintain an impartial and independent electoral system for eligible voters through active electoral roll management, efficient delivery of polling

services and targeted education and public awareness programs.’¹⁸⁶ Under section 7(1) of the *Commonwealth Electoral Act 1918*, the AEC’s functions include:

(c) to promote public awareness of election and ballot matters, and Parliamentary matters, by means of the conduct of education and information programs and by other means;

...

(f) to publish material on matters that relate to its functions; ...

4.2 Non-corporate Commonwealth entities undertaking campaign advertising are required to comply with the framework, which includes the 2022 Guidelines, except where a Ministerial exemption has been granted.

4.3 Since August 2009, the AEC has had an exemption from the Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities (the Guidelines) and associated review and approval arrangements for government advertising campaigns.¹⁸⁷ The exemption means that AEC advertising campaigns are exempt from review by the Independent Communications Committee (ICC) and the government review and approval processes.¹⁸⁸ The AEC is also exempt from the use of certain procurement arrangements that are mandatory for other non-corporate Commonwealth entities.¹⁸⁹

4.4 The AEC has developed its own campaign guidance documentation, the ‘AEC communication campaigns: Guidelines and mandatory checklist’ (AEC Guidelines). The AEC Guidelines set out the requirements for campaign development and certification.¹⁹⁰ The AEC Guidelines state that ‘The AEC’s exemption is granted due to the need for all campaigns on electoral events to be conducted, and perceived as, independent from the Australian Government.’¹⁹¹ There are four ‘Overarching guidelines for AEC campaigns’, the first of which is that ‘All AEC communication campaigns should comply with the broad intent of the *Australian Government Guidelines on Information and Advertising campaigns*.’¹⁹² Appendix 4 provides a comparison of the

186 Australian Electoral Commission, *AEC 2024–25 Corporate Plan*, AEC, Canberra, August 2024, available from https://www.aec.gov.au/About_AEC/Publications/corporate-plan/ [accessed 12 September 2024].

187 The AEC’s 2009 exemption is discussed in Auditor-General Report No.24 2011–12, *Administration of Government Advertising Arrangements: March 2010 to August 2011*, ANAO, Canberra, 2012, paragraphs 7.9–7.27, available from <https://www.anao.gov.au/sites/default/files/201112%20Audit%20Report%20No%2024.pdf> [accessed 21 August 2024].

188 The review and approval arrangements are outlined in Chapter 1 (Box 1) of this report.

189 These include the GCCP and whole-of-government arrangements for campaign evaluation. The AEC places advertising through the Central Advertising System (see Chapter 1, Box 2 in this report). AEC campaigns are not developed under the ‘village model’ overseen by Finance (see paragraphs 1.9 and 2.13–2.18).

190 In this chapter, references to the ‘2022 Guidelines’ refer to the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, December 2022. References to the ‘AEC Guidelines’ refer to the ‘AEC communication campaigns: Guidelines and mandatory checklist’, the AEC internal document that details AEC’s requirements for the development and certification of advertising campaigns.

191 The AEC Guidelines further state that ‘Each electoral cycle the AEC writes to the relevant Minister to re-confirm the exemption and explain the agency’s own comprehensive campaign certification process.’ The AEC most recently received the relevant Minister’s approval for the continuation of its exemption arrangements in October 2022.

192 The other overarching guidelines for AEC campaigns relate to campaign development and review processes (see paragraph 4.18).

requirements under the framework for non-corporate Commonwealth entities and the AEC Guidelines.

4.5 To examine whether the AEC's campaign was subject to appropriate review and oversight under the AEC Guidelines and complied with the intent of the 2022 Guidelines, the ANAO assessed the AEC's:

- processes for campaign review, certification and publication;
- compliance with the intent of the principles outlined in the 2022 Guidelines; and
- evaluation of the campaign's effectiveness.

Campaign overview

4.6 On 19 June 2023, the Constitution Alteration (Aboriginal and Torres Strait Islander Voice) 2023 (the Bill) was passed by both Houses of Parliament.¹⁹³ The Bill set the referendum question and proposed amendment for the 2023 referendum on an Aboriginal and Torres Strait Islander Voice. The referendum date of 14 October 2023 was announced by the Prime Minister on 30 August 2023.

4.7 The AEC developed and administered the 2023 referendum campaign — known by its campaign slogan 'Your Answer Matters' (the campaign) — 'to assist and educate Australians to get vote ready for the referendum' and the campaign 'explains why referendums are held'.¹⁹⁴ The Your Answer Matters campaign commenced on 20 August 2023 and ran until 14 October 2023, the day of the referendum. The campaign comprised five phases:

- Education — 'aimed to increase awareness of the purpose and process of referendums';
- Close of Rolls — 'aimed to maximise participation in the referendum by encouraging eligible voters to enrol or to check and update their details';
- Voter Services — 'aimed to raise awareness of voting options available for those unable to make it on voting day ... [and] supported turnout by encouraging voters to plan ahead and reinforce that participating in the potential referendum is important and worthwhile';
- Formality — 'explained how to complete the ballot paper correctly'; and
- Disinformation — 'aimed to enhance awareness and understanding regarding the potential spread of disinformation about the voting process during the referendum period'.

193 Parliament of Australia, *Constitution Alteration (Aboriginal and Torres Strait Islander Voice) 2023*, Parliament of Australia, 2023, available from https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bid=r7019 [accessed 4 September 2024].

194 Australian Electoral Commission, 'Your Answer Matters AEC launches 2023 referendum advertising campaign', media release, AEC, Canberra, 19 August 2023, available from <https://www.aec.gov.au/media/2023/08-19.htm> [accessed 9 September 2024].

The AEC advised the ANAO in October 2024 that the media release was published the day before the campaign was launched because 'The media release was timed with when the AEC referendum web information went live, which included campaign elements. Media placement started on 20 August'.

The AEC conducted other advertising activities relating to the referendum, including a separate pre-legislation referendum advertising campaign to direct people to general information on the AEC's website and other non-campaign advertising such as placing public-notice style advertisements to inform voters of the issue of the writ and information on local polling places.

4.8 Figure 4.1 shows the timing of the five campaign phases.

Figure 4.1: Your Answer Matters campaign phases

	August 2023				September 2023				October 2023			
	6	13	20	27	3	10	17	24	1	8	15	22
Education			Education (20 August – 23 September)									
Close of Rolls					Close of Rolls (11 September – 18 September)							
Voter Services							Voter Services (22 September – 13 October)					
Formality							Formality (22 September – 14 October)					
Disinformation			Disinformation (20 August – 14 October)									

Source: ANAO analysis of AEC documentation.

4.9 Key elements of the Your Answer Matters campaign are summarised in Table 4.1.

Table 4.1: Summary of the Your Answer Matters campaign^a

Campaign summary	
Objectives	There were 23 objectives for the Your Answer Matters campaign. They focused on raising awareness about voting in the referendum. See Appendix 5 for a full list of objectives.
Call to action	Each of the five phases of the campaign materials encouraged viewers to visit the AEC's website, aec.gov.au , to undertake actions specific to the phase.
Timing	<ul style="list-style-type: none"> Education phase: 20 August 2023–23 September 2023 Close of Rolls phase: 11 September 2023–18 September 2023 Voter Services phase: 22 September 2023–13 October 2023 Formality phase: 22 September 2023–14 October 2023^b Disinformation phase: 20 August 2023–14 October 2023^b
Target audience	<p>Primary audience: all Australian citizens who were eligible to vote in the referendum. Approximately 17.7 million citizens were registered to vote.</p> <p>Secondary audiences: Appendix 6 details the priority audiences for each campaign phase.</p>
Campaign activities	<p>Advertising materials included television, radio, cinema, digital video, digital display, digital audio, press, out of home^c, social media and digital search.</p> <p>Media partnership materials included a podcast series, Snapchat filter with quiz questions^d and video and audio content in languages other than English.</p> <p>Public relations materials included stakeholder kits for culturally and linguistically diverse (CALD) audiences and illustrated booklets for Aboriginal and Torres Strait Islander audiences.</p>

Campaign summary	
Total campaign budget (GST exclusive)	\$33.6 million
Total campaign expenditure (GST inclusive)	\$35.2 million
Media expenditure (GST inclusive)	<p>\$27.3 million</p> <p>The breakdown of the cost of the media placement for each phase was:</p> <ul style="list-style-type: none"> • Education: \$9.6 million • Close of Rolls: \$3.9 million • Voter Services: \$5.5 million • Formality: \$5.2 million • Disinformation: \$0.8 million <p>For the media placement cost, partnerships and digital search was calculated separately to the campaign phases, for a total of \$0.7 million and \$1.5 million, respectively.</p>
Supplier expenditure (GST inclusive)	<p>Total: \$7.9 million, including:</p> <ul style="list-style-type: none"> • Research — ORIMA Research: \$0.7 million; • Creative — BMF: \$4.4 million; • Aboriginal and Torres Strait Islander communications — Carbon Creative: \$0.6 million; • Multicultural communications — Cultural Perspectives: \$1.4 million; and • Evaluation — Wallis Social Research: \$0.8 million.

Note a: Figures are rounded to one decimal place. Discrepancies between totals and sums of components is due to rounding. Errors in publicly reported figures are discussed in paragraph 4.39.

Note b: The referendum was held on 14 October 2023.

Note c: Out of home advertising, or outdoor advertising, includes billboards and posters displayed in public places.

Note d: The Snapchat filter prompted users to tilt their head left or right to answer AEC referendum-related questions. For an example of the Snapchat filter with quiz questions, see Figure 4.3.

Source: ANAO analysis of AEC documentation.

Campaign development and approval

4.10 In July 2022, the Indigenous Referendum Steering Committee approved the early release of \$275,000 for developmental research to inform a potential referendum campaign.¹⁹⁵ An external supplier (ORIMA Research) was contracted to undertake the developmental research and produced a report in September 2022. The research report identified five key outcomes, including that ‘Knowledge about referendums and the potential referendum is limited and incorrect’ and ‘In

195 The Indigenous Referendum Steering Committee supported the AEC’s coordination of the referendum. The committee was later renamed the Referendum Steering Committee, then the Referendum Coordination Committee. The Committee was chaired by the Deputy Electoral Commissioner and operated between July 2022 and August 2023.

addition to the usual election-time campaign phases, a distinct “education” campaign phase is required – it should begin as soon as possible after the referendum legislation passes the Senate.¹⁹⁶

4.11 In September 2022, the Electoral Commissioner approved ‘an overarching framework for a communication strategy to educate and inform Australian voters about the potential referendum’ based on findings from the developmental research. The Electoral Commissioner’s approval was also received for subsequent milestones in campaign development and implementation (see paragraph 4.23) and for certification of the campaign (see paragraphs 4.28 to 4.30).

Campaign funding

4.12 The campaign was part of a \$364.6 million funding package over three years to deliver the referendum, of which \$336.6 million was for the AEC to deliver the referendum.¹⁹⁷ The campaign had a budget of \$33.6 million.

Campaign materials

4.13 The campaign included advertisements, media partnerships and public relations materials, as outlined in Table 4.2.

Table 4.2: Number of campaign materials created for the Your Answer Matters campaign^a

Advertisements	Media partnerships	Public relations materials ^b
1500 ^c	13	22

Note a: For an outline of different types of campaign materials, see paragraph 2.22.

Note b: The AEC used the term ‘community relations materials’ to distinguish from the AEC’s public relations activities that did not form part of the campaign.

Note c: Advertisements include the materials created for all five phases of the campaign: Education, Close of Rolls, Voter Services, Formality and Disinformation. AEC advised the ANAO in October 2024 that this was an approximate figure that included translated materials.

Source: ANAO analysis of AEC documentation.

4.14 The AEC engaged in media partnerships as part of the campaign. These were a:

- podcast series developed with Southern Cross Austereo, consisting of 10 short podcast episodes related to the referendum process¹⁹⁸;
- partnership with Snapchat, creating a Snapchat filter with a quiz (see Figure 4.3); and
- partnership with the Special Broadcasting Service (SBS), creating audio and animated video content in 32 languages. These were published by SBS, directing viewers to visit the AEC’s website.¹⁹⁹

196 The other three outcomes of the developmental research report related to voter intentions and behaviours, potential turnout and formality rates and the need to draw on known motivators to influence intention to vote.

197 Australian Government, *Budget Paper No. 2: Budget Measures 2023–24*, Commonwealth of Australia, Canberra, 9 May 2023, p. 85, available from https://archive.budget.gov.au/2023-24/bp2/download/bp2_2023-24.pdf [accessed 9 September 2024].

198 Podcasts were typically under ten minutes in duration and addressed topics including ‘Why have a referendum?’, ‘Referendum misconceptions’ and ‘What Happens Next’.

199 The SBS partnership had content for the Education and Disinformation phases of the campaign.

4.15 The podcast series and Snapchat media partnerships were designed to target young voters²⁰⁰, while the SBS media partnership targeted CALD audiences.

4.16 The AEC delivered a range of public relations materials. For Aboriginal and Torres Strait Islander audiences, materials included illustrated booklets and information sheets. For CALD audiences, these included a media briefing, information sheets and an education kit about the referendum for CALD media organisations.²⁰¹

4.17 Examples of advertising materials are shown in Figure 4.2. Figure 4.3 shows an example of the Snapchat filter with quiz questions.

Figure 4.2: Examples of Your Answer Matters campaign advertisements^a



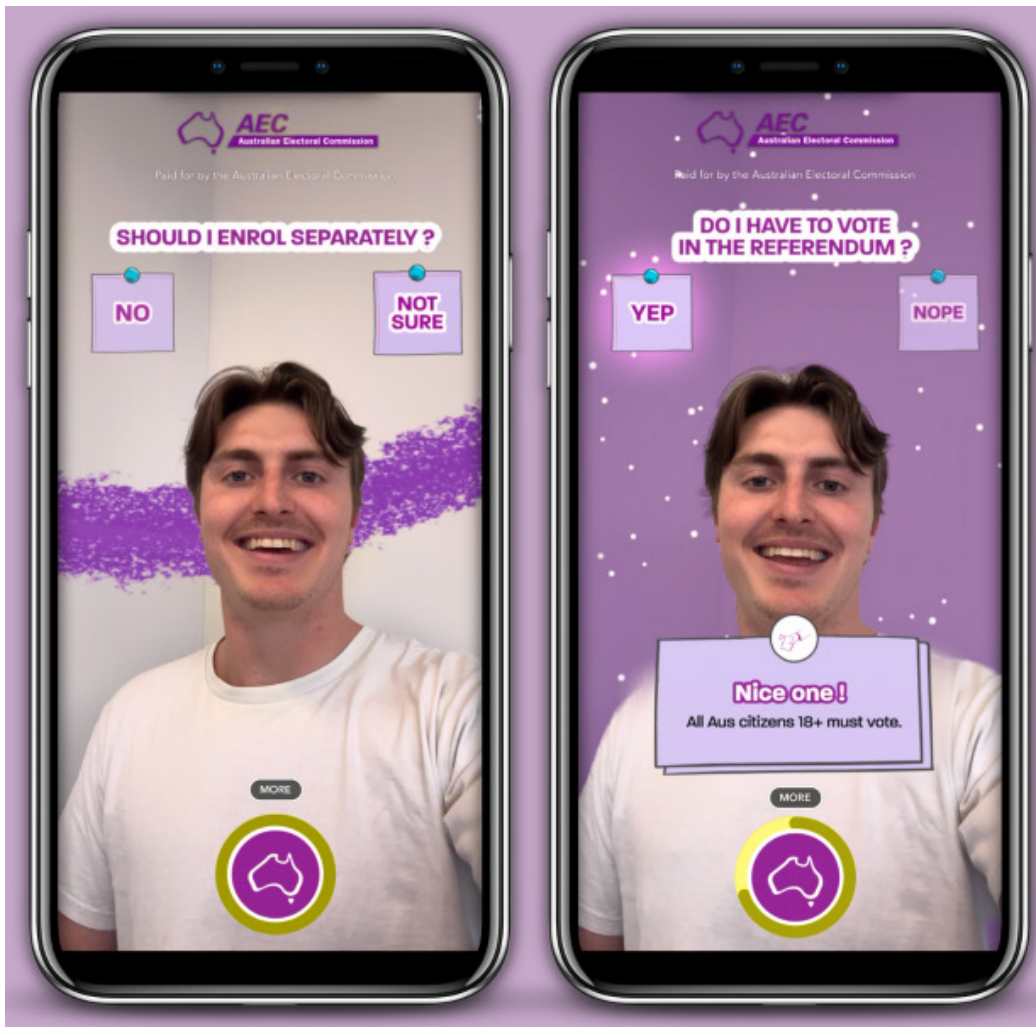
Note a: The advertising materials are from the different phases of the campaign. These are, clockwise from top left: Education, Close of Rolls, Disinformation, Formality and Voter Services.

Source: AEC documentation.

200 Young voters included those aged 17 to 35 years.

201 An assessment of the AEC’s communications with different target audiences is in paragraphs 4.48 to 4.54.

Figure 4.3: Snapchat filter with quiz questions



Source: AEC documentation.

Were the necessary review, certification and publication requirements undertaken?

Due to its exemption, the AEC was not subject to review by the ICC or government review and approval processes. The AEC had documented requirements for campaign development and certification in the form of the 'AEC communication campaigns: Guidelines and mandatory checklist' (AEC Guidelines). The version of the AEC Guidelines used for the Your Answer Matters campaign was in draft and there was no documented approval.

Under the AEC Guidelines, the AEC has committed to complying with the intent of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2022 Guidelines). The AEC Guidelines did not establish a requirement for legal advice confirming compliance with Principle 5 of the 2022 Guidelines to be provided to the Electoral Commissioner prior to campaign certification.

The AEC followed an internal review process that involved the Electoral Commissioner providing approval for key campaign development milestones. The Electoral Commissioner

signed two certifications for the campaign, which were both published on the AEC's website in accordance with the AEC Guidelines.

The AEC did not publish campaign research reports on its website and did not document consideration of whether publication of the research reports was appropriate and there were inaccuracies in the reporting of campaign expenditure figures in the AEC annual report and subsequent reporting to the Department of Finance.

Review and certification requirements

The AEC Guidelines

4.18 As discussed in paragraphs 4.2 to 4.4, the AEC is exempt from the ICC's review and the government review and approval of advertising campaigns.²⁰² The AEC has developed the AEC Guidelines, which detail its requirements for the development and certification of advertising campaigns. The AEC's 'overarching internal guidelines' were:

AEC guideline 1: All AEC communication campaigns should comply with the broad intent of the *Australian Government Guidelines on Information and Advertising campaigns*.

AEC guideline 2: Campaign managers must complete the *AEC communications campaign mandatory checklist* during the development phases of the campaign and update and finalise the checklist ahead of the campaign appearing in market. Once finalised and endorsed by the Electoral Commissioner, the checklist should be published on the AEC website.

AEC guideline 3: Campaign managers are required to report regularly to the Assistant Commissioner, Electoral Integrity and Communications, regarding significant campaign expenditure and demonstrated value for money ...

AEC guideline 4: Campaign managers are required to provide reports on the campaign's progress to the Electoral Commissioner in the form of:

- information during the development phase(s) of the campaign, which details how the campaign is complying with the Australian Government campaign guidelines, including a copy of the current *AEC communications campaign mandatory checklist*
- the final *AEC communications campaign mandatory checklist* for endorsement by the Electoral Commissioner before publication on the AEC website, once the campaign is in the implementation phase
- information following implementation of the campaign detailing the key elements of implementation and any significant issues encountered, either with or separate to
- advice following the receipt of evaluation research on the campaign, including a summary of key research findings and recommendations for future campaigns. [emphasis in original]

4.19 The AEC advised the ANAO in August 2024 that the AEC Guidelines are reviewed 'Usually once per each electoral cycle' and that the October 2022 version of the AEC Guidelines was used for the campaign. This version contained changes to the 'overarching internal guidelines' and the

202 See Appendix 4 for a comparison of the AEC's requirements with requirements under the advertising framework for other non-corporate Commonwealth entities.

mandatory checklist (discussed in paragraph 4.18). It was not approved²⁰³, was in draft and contained out of date protective markings.²⁰⁴

4.20 Advice on all aspects of the AEC's compliance with the legal requirements of Principle 5 of the 2022 Guidelines was provided one month after the campaign commenced, contrary to the intent of the 2022 Guidelines (see paragraphs 4.68 to 4.71).²⁰⁵ The processes described in the version of the AEC Guidelines used during the campaign did not make reference to the provision of legal advice during campaign development.

Recommendation no. 3

4.21 The Australian Electoral Commission update the 'AEC communications campaigns: Guidelines and mandatory checklist' (AEC Guidelines) to include:

- (a) a requirement for legal advice confirming compliance with Principle 5 of the Australian Government Guidelines on Information and Advertising campaigns to be provided to the Electoral Commissioner prior to campaign certification; and
- (b) details of version control and approval of the AEC Guidelines.

Australian Electoral Commission response: *Agreed.*

4.22 *The AEC will update the AEC communications campaigns: Guidelines and mandatory checklist to include a requirement for legal advice confirming compliance with Principle 5 of the Australian Government Guidelines on Information and Advertising campaigns and that this will be provided to the Electoral Commissioner prior to campaign certification. In addition, the AEC will update its Guidelines to include appropriate version control and seek documented approval of the Guidelines by the Electoral Commissioner each electoral cycle.*

Campaign review

4.23 AEC Guideline 4 (see paragraph 4.18) states that campaign managers are required to provide reports on the campaign's progress to the Electoral Commissioner. The AEC advised the ANAO in August 2024 that 'The EC [Electoral Commissioner] was engaged throughout campaign development and provided information about the internal certification processes'. The Electoral Commissioner's approval was sought for:

- the campaign's creative concept;
- advertising materials for the five phases of the campaign;

203 The AEC Guidelines were first introduced in 2012. The AEC provided the ANAO with documentation relating to the development of the advertising campaign for the 2022 federal election that showed the Electoral Commissioner noting an earlier version of the AEC Guidelines.

204 The October 2022 version of the AEC Guidelines contained comments and highlighted text. The document was marked 'For official use only', a security classification which was discontinued following changes to the Australian Government's Protective Security Policy Framework in 2018. The 2022 Guidelines were updated in December 2022, the ANAO did not observe further updates to the AEC Guidelines following this update.

205 Paragraph 19 of the 2022 Guidelines states that 'Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines' and 'Following consideration of the reports on campaign advertising compliance, the Accountable Authority will certify that the campaign complies with the Guidelines and relevant Government policies ... [and] The Accountable Authority certification will be published on the relevant entity's website when the campaign is launched.'

- media channels and media buy;
- media partnerships; and
- public relations materials.

4.24 These briefings did not include information about the certification process or the ‘AEC communications campaign mandatory checklist’ as required by AEC Guideline 4.

4.25 In addition to the Electoral Commissioner’s review, the AEC’s Executive Leadership Team (ELT)²⁰⁶ made decisions on the number of languages into which the campaign content was to be translated in order to reach CALD audiences and the selection of the media partnerships. ELT members were consulted on the selection of talent²⁰⁷, locations featuring in advertisements and the final advertising materials. The role of the ELT is not captured in the AEC Guidelines.

Opportunity for improvement

4.26 The AEC could update the AEC communication campaigns: Guidelines and mandatory checklist to reflect the roles of the Electoral Commissioner and the Executive Leadership Team in the review and approval processes for advertising campaigns.

Internal reporting of campaign expenditure

4.27 The AEC Guidelines include a requirement that ‘Campaign managers are required to report regularly to the Assistant Commissioner of Electoral Integrity and Communications regarding significant campaign expenditure and demonstrated value for money.’ The AEC advised the ANAO in August 2024 that this did not occur because ‘All expenditure was based on Rule 18 spending approvals and agreed contracts.’²⁰⁸

Campaign certification

4.28 The AEC Guidelines outline that the Electoral Commissioner provides certification that campaigns comply with the principles of the 2022 Guidelines. This is consistent with the requirements of the 2022 Guidelines²⁰⁹ where the accountable authority provides certification of campaigns. The Electoral Commissioner signed two certifications for the campaign.

- On 18 August 2023, the first certification was signed. This was for the Education and Disinformation phases, which launched on 20 August 2023.
- On 11 September 2023, the second certification was signed, prior to the launch of the remaining phases of the campaign (the Close of Rolls, Voter Services and Formality phases).²¹⁰

206 The Executive Leadership Team is comprised of the Electoral Commissioner, Deputy Electoral Commissioner and the AEC’s four First Assistant Commissioners.

207 ‘Talent’ refers to people appearing in campaign materials.

208 Rule 18 of the PGPA Rule relates to approving commitments of relevant money by entity accountable authorities and officials.

209 See paragraph 19 of the 2022 Guidelines.

210 The AEC advised the ANAO in October 2024 that the second certification was required because: Advertising materials for the first two phases (which were initially produced without a date) needed to be ready sooner than the other three phases. This was based on production timelines and the earliest likely date for the referendum to be held.

4.29 To support both certifications, the Electoral Commissioner was provided with a ‘mandatory checklist’, which included information on how the AEC complied with each of the five principles of the 2022 Guidelines.²¹¹ At the time of the first certification, the Electoral Commissioner had already provided approval for the creative concept, campaign materials, media channels, media partnerships and some of the public relations activities.²¹²

4.30 For both certifications, advice on compliance with Principle 5 (legal requirements) of the 2022 Guidelines was limited to the statements included in the mandatory checklists.²¹³ As discussed in paragraphs 4.68 to 4.71, advice on all aspects of the AEC’s compliance with Principle 5 of the 2022 Guidelines was provided one month after the campaign commenced. Other non-corporate Commonwealth entities undertaking advertising campaigns typically provide their accountable authority with a report from their legal area or external legal service provider that details the substantive basis for compliance with Principle 5 to support the certification of the campaign. The AEC could enhance the level of assurance provided to the Electoral Commissioner on compliance with Principle 5 by adopting this practice (see Recommendation 3, paragraph 4.21).

Publication processes

4.31 The AEC Guidelines require publication of the Electoral Commissioner’s certification of campaigns to be published on the AEC website.²¹⁴

4.32 The 2022 Guidelines state that:

22. Accountable Authorities will ensure that:

- research reports for advertising campaigns with expenditure of \$250,000 exclusive of GST or more are published on their entity web site following the launch of a campaign, where it is appropriate to do so; ...

4.33 The AEC Guidelines do not include an equivalent requirement.²¹⁵

211 The ‘mandatory checklist’ provided for the second certification contained a small number of updates to information contained in the version provided for the first certification. Changes included the addition of the referendum date and changes relating to content for Aboriginal and Torres Strait Islander audiences. Both checklists reflected the update to the 2022 Guidelines around communication and the use of imagery of people with disability.

212 See paragraph 4.23.

213 This is further discussed in paragraphs 4.68–4.71.

214 This mirrors the requirement under the 2022 Guidelines for publication of campaign certification statements.

215 As discussed in paragraph 4.18, the AEC Guidelines state that ‘All AEC communication campaigns should comply with the broad intent of the *Australian Government Guidelines on Information and Advertising campaigns.*’

4.34 Specific requirements regarding the publication of campaign information in entity annual reports are included in paragraph 17AH(1)(a) of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.²¹⁶ This requirement is not affected by the AEC’s exemption.

4.35 Table 4.3 outlines the AEC’s compliance with publication requirements for the Your Answer Matters campaign.

Table 4.3: Compliance with publication requirements

For publishing	Complied
Accountable authority certification ^a	●
Independent Communications Committee compliance advice	Not applicable due to exemption from 2022 Guidelines
Annual report ^b	● ^c
Publication of research reports ^d	See paragraph 4.37
<i>Campaign Advertising by Australian Government Departments and Entities Report 2023–24^e</i>	● ^f

Key: ● AEC complied with the publication requirement.

● the requirement was largely met.

Note a: AEC Guidelines requirement (consistent with paragraph 19 of the 2022 Guidelines).

Note b: Subparagraph 17AH(1)(a)(i) of the PGPA Rule and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.

Note c: In the AEC’s 2022–23 and 2023–24 annual reports, the campaign information was not presented in accordance with the requirements set out in the PGPA rule. Inaccurate expenditure figures were also reported (see paragraph 4.39).

Note d: Paragraph 22 of the 2022 Guidelines. There is no equivalent in the AEC Guidelines, against which AEC is being assessed. See paragraph 4.37.

Note e: Paragraph 21 of the Guidelines states that ‘The Government will provide reports to the Parliament that detail expenditure on all advertising campaigns with expenditure in excess of \$250,000 exclusive of GST commissioned by PGPA Act entities.’ As discussed in paragraphs 2.81 to 2.82, Finance relies on information provided by entities that have undertaken advertising campaigns for this reporting.

Note f: See paragraph 4.39 for inaccuracies in campaign expenditure figures provided to Finance.

Source: ANAO analysis of AEC documentation.

4.36 The two Electoral Commissioner’s certifications were published on the AEC’s website on 18 August 2023 and 11 September 2023, as required by the AEC Guidelines. The AEC published details of the campaign in its 2022–23 and 2023–24 annual reports. The AEC did not include the wording required by the PGPA Rule.

216 Subparagraph 17AH(1)(a)(i) of the PGPA Rule requires that entities that have undertaken advertising campaigns include in their annual reports:

a statement that “During [reporting period], [name of entity] conducted the following advertising campaigns: [name of advertising campaigns undertaken]. Further information on those advertising campaigns is available at [address of entity’s website] and in the reports on Australian Government advertising prepared by the Department of Finance. Those reports are available on the Department of Finance’s website.”

4.37 The AEC did not publish campaign research reports on its website. There was no evidence that the AEC considered whether publication of the research reports was appropriate.²¹⁷ The AEC advised the ANAO in April 2024 that publishing campaign research reports:

was not considered appropriate due to the sensitive environment during the development, lead-up to and during the campaign. It is noted that the guidelines specifically state “where it is appropriate to do so”.

Opportunity for improvement

4.38 To better reflect the intent of the Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities, the AEC could include a requirement in the AEC communication campaigns: Guidelines and mandatory checklist to:

- (a) publish campaign research reports on its website where appropriate to do so; and
- (b) document consideration of whether publication of campaign research reports is appropriate for each campaign.

4.39 Campaign expenditure information is presented in entity annual reports and in the Department of Finance’s annual *Campaign Advertising by Australian Government Departments and Entities* report (see paragraphs 2.81 to 2.82). There were discrepancies between expenditure figures the AEC provided to Finance for publication in its 2023–24 report and figures included in the AEC’s 2023–24 annual report.²¹⁸ In its annual report, the AEC reported its media expenditure was \$28.6 million, when final expenditure was \$27.3 million.²¹⁹

Opportunity for improvement

4.40 The AEC could strengthen its governance practices to ensure the accuracy of its publicly reported campaign advertising information.

217 This was similar to the last ANAO audit report into government advertising involving the AEC, Auditor-General Report No.24 2011–12, *Administration of Government Advertising Arrangements: March 2010 to August 2011*, where the AEC was also found not to have documented its reasons for not publishing the material. Auditor-General Report No.24 2011–12, *Administration of Government Advertising Arrangements: March 2010 to August 2011*, ANAO, Canberra, 2012, p. 182, available from <https://www.anao.gov.au/sites/default/files/201112%20Audit%20Report%20No%2024.pdf> [accessed 21 August 2024].

218 The figures in the AEC’s annual report were \$19,584 (GST exclusive) higher for creative services and \$22,975 (GST exclusive) lower for First Nations communications compared to figures the AEC provided to Finance for publication in its report. The AEC advised the ANAO in February 2025 that the difference in the First Nations reporting was due to individual payments that fell below the \$16,300 reporting threshold being excluded from the total. The AEC also incorrectly provided Finance with GST inclusive contract values, which were included in the Finance report as GST exclusive.

219 In the Finance report, ‘media placement’ was reported as \$23.9 million. This is ‘gross media’ expenditure and does not include service charges paid by entities to the Master Media Agency.

Were the principles of the framework adhered to?

The AEC complied with the intent of Principles 1 to 4 of the 2022 Guidelines and largely complied with Principle 5. Legal advice addressing all legal requirements of Principle 5 was finalised after the campaign had commenced. The AEC had not documented attribution requirements for media partnerships or public relations materials. Details of one procurement were not accurately reported on AusTender.

4.41 As discussed in paragraph 4.4, while AEC campaigns are exempt from external review and approvals, the AEC Guidelines state that ‘All AEC communication campaigns should comply with the broad intent of the *Australian Government Guidelines on Information and Advertising campaigns*.’ The ANAO assessed the Your Answer Matters campaign against the five principles of the 2022 Guidelines.²²⁰

Principle 1 — Relevant to government responsibilities

4.42 In the 2022 Guidelines, one of the ‘considerations’ for demonstrating compliance with Principle 1 is that ‘The policy or program is underpinned by ... legislative authority’. The campaign met this as educating the public regarding elections and referendums is one of the AEC’s functions under section 7(1) of the *Commonwealth Electoral Act 1918*, as discussed in paragraph 4.1.

4.43 Both versions of the mandatory checklists stated that the campaign would ‘provide information on government programs or services or revisions to programs or services to which the public are entitled’. This was consistent with the examples of suitable uses for government campaigns listed in the 2022 Guidelines.²²¹

Principle 2 — Presented in an objective, fair and accessible manner

Campaign content

4.44 In the 2022 Guidelines, the considerations for demonstrating compliance with Principle 2 include:

- The recipients of the information can distinguish between facts, comment, opinion and analysis;
- Information presented as a fact, is accurate and verifiable;
- The basis of factual comparisons is clear and does not mislead the recipient about the situation;
- Pre-existing policies, products, services and activities are not presented as new; ...

4.45 The ANAO reviewed all advertising materials and assessed that AEC was compliant with the objectivity requirements of Principle 2.

4.46 As discussed in paragraph 4.23, media partnerships and public relations materials were approved by the Electoral Commissioner. The AEC legal team reviewed content for accuracy prior to approval by the Electoral Commissioner.

220 The AEC Guidelines do not establish any additional principles that the AEC must comply with.

221 Under subsection 45(1) of the *Referendum (Machinery Provisions) Act 1984*, ‘It is the duty of each elector to vote at a referendum.’

Accessibility of campaign materials

4.47 In the 2022 Guidelines, the ‘considerations’ for demonstrating compliance with Principle 2 also include:

- Special attention is paid to communicating with disadvantaged individuals or groups identified within the target audience. Particular attention is paid to meeting the information needs of Aboriginal and Torres Strait Islander Australians, the rural community, people with disability and those for whom English is not a convenient language in which to receive information;
- Imagery used in campaigns appropriately reflects the diverse range of Australians. Where it is consistent with the campaign objectives, this includes the realistic portrayal of the full participation of women, Aboriginal and Torres Strait Islander Australians, culturally and linguistically diverse communities and people with disability; ...

4.48 The campaign was targeted at all Australian citizens who were eligible to vote in the referendum, with specific targeting undertaken for Aboriginal and Torres Strait Islander audiences, CALD audiences, people aged 17 to 35 years, voters in rural and remote areas and voters with disability.²²²

4.49 Advertising materials were placed in media channels targeting Aboriginal and Torres Strait Islander audiences and dedicated creative materials were created to communicate with Aboriginal and Torres Strait Islander audiences, including materials translated into 21 indigenous languages. Public relations materials were also developed to reach Aboriginal and Torres Strait Islander audiences, including information sheets and illustrated booklets (see paragraph 4.16).

4.50 To reach CALD audiences, campaign materials were made available in 34 languages.²²³ Advertising materials were translated into 32 languages²²⁴ and materials were placed in dedicated CALD communications channels. As discussed in paragraph 4.14, the AEC established a media partnership arrangement with SBS, which involved placement of longer format audio materials and animations in 32 languages. Public relations targeting CALD audiences included a media briefing, information sheets and an education kit about the referendum for CALD media organisations.

4.51 Young voters (aged 17 to 35 years) were targeted through media partnerships, including podcasts and Snapchat (see paragraph 4.14).

4.52 The AEC created and distributed advertising materials targeting voters in remote areas, including advertising about remote voter services.²²⁵ Advertising was placed in regional television, radio and press channels.

222 Target audiences identified by the AEC for each phase of the campaign are listed in Appendix 6. The AEC targeted audiences aged 17 to 24 years in the Close of Rolls phase and those aged 18 to 24 years in the Voter Services and Formality phases. Audiences aged 17 years were targeted in the Close of Rolls phase to capture people who would become eligible to vote on or prior to the date of the referendum.

223 The AEC advised the ANAO in October 2024 that ‘Media placement for all 34 languages was not available.’ Materials in two languages (Karen and Hazaragi) were created for public relations activities but there were no advertisements in these languages.

224 Not all advertising materials were translated into all 32 languages. For example, for the Voter Services phase, the television advertisement was translated into 25 languages, the press advertisement was translated into 14 languages and the radio advertisement was translated into 32 languages.

225 Remote voter services involves AEC polling officials visiting remote communities to facilitate in-person voting.

4.53 To communicate with voters with disability, digital video advertisements had audio and captions, and content was placed on digital audio channels designed for people with low vision. The AEC also placed advertisements through ‘radio print handicapped’ channels.²²⁶

4.54 Final concept testing undertaken to determine the efficacy of advertising materials prior to the campaign’s launch identified that the advertisements were ‘Appropriately diverse and inclusive – i.e. representative of a range of cultural backgrounds, ages, genders and people with disability.’

Campaign testing

4.55 The 2022 Guidelines state that one of the ‘considerations’ for demonstrating compliance with Principle 2 includes:

- Campaigns are tested with target audiences to indicate they are engaging and perform well against their objectives.

4.56 The AEC conducted three waves of concept testing to determine the effectiveness and engagement of the campaign materials. The final testing undertaken before the campaign’s launch identified that ‘the suite of campaign materials tested in the refinement testing research was found to be cohesive and effective in supporting the achievement of the range of campaign objectives.’

Principle 3 — Objective and not directed at promoting party political interests

4.57 In the 2022 Guidelines, the ‘considerations’ for demonstrating compliance with Principle 3 include:

- Language used in the campaign is objective language and is free of political argument; and
- Campaigns must not try to foster a positive impression of a particular political party or promote party political interests.

4.58 The 2022 Guidelines also state that:

Campaigns must not:

- a. mention the party in Government by name;
- b. directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
- c. include party political slogans or images;
- d. be designed to influence public support for a political party, a candidate for election, a Minister or a Member of Parliament; or
- e. refer or link to the web sites of politicians or political parties.

4.59 The mandatory checklists provided to the Electoral Commissioner stated the following for Principle 3.

Campaign materials are apolitical and do not promote political parties, referendum campaigners or their interests.

226 Radio print handicapped channels are for people who are blind, have low vision or have low literacy.

Campaign materials do not mention or promote any political party or candidates, referendum campaigners, their views, or slogans. Campaign materials include the AEC logo and authorisation from the Electoral Commissioner to clearly identify the information source.

All website links direct the audience to the AEC website.

4.60 The ANAO's review of the advertising materials for the campaign identified they were compliant with the requirements for Principle 3.

4.61 As discussed in paragraph 4.46, media partnership and public relations materials were reviewed by AEC's legal area before being approved by the Electoral Commissioner. The content from the media partnerships and public relations materials reviewed by the ANAO were compliant with Principle 3.

4.62 Briefings provided to the AEC's ELT in June 2023 seeking approval of the media partnership approach providers stated:

The neutrality of potential partners was the primary consideration. Potential general population audience partners agreed to neutrality provisions and signed confidentiality agreements before being briefed and given access to campaign creative. The recommended partners have committed to providing a safe, neutral space for AEC-branded referendum content and ensuring this content does not appear with Yes/No campaign material. The partners have also confirmed their platforms will not be campaigning for a specific outcome.

4.63 Additional steps taken by the AEC to ensure impartiality included:

- pausing the 'Enrolment Campaign – Aboriginal and Torres Strait Islander Voters Phase 2' campaign following the passing of the Constitution Alteration (Aboriginal and Torres Strait Islander Voice) 2023 Bill²²⁷;
- testing perceptions of impartiality during testing of campaign materials²²⁸;
- including political neutrality requirements in deeds of standing offer with suppliers; and
- undertaking background checks on the talent appearing in advertising materials.

Principle 4 — Justified and undertaken in an efficient, effective and relevant manner

4.64 In the 2022 Guidelines, the 'considerations' for demonstrating compliance with Principle 4 include:

- Campaigns are only instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence;

227 The Constitution Alteration (Aboriginal and Torres Strait Islander Voice) 2023 Bill was passed by both houses of Parliament on 19 June 2023. The AEC requested that UM pause the 'Enrolment Campaign – Aboriginal and Torres Strait Islander Voters Phase 2' campaign on 20 June 2023, to avoid confusion with the Your Answer Matters campaign and the subject matter of the referendum.

228 Final concept testing found that:

The campaign reflected positively on the AEC's brand and reputation, with participants reporting that it portrayed the AEC as:

- "Neutral" and "unbiased";
- "Professional", "credible" and "doing a good job"; and
- "Caring", "approachable" and "inclusive".

- Campaign information clearly and directly affect the interests of recipients;
- The medium and volume of the advertising activities is cost effective and justifiable within the budget allocated to the campaign;
- Distribution of unsolicited material should be carefully controlled; and
- Campaigns are evaluated to determine effectiveness.

4.65 For the Your Answer Matters campaign there was evidence of:

- a documented justification for the campaign (see paragraphs 4.10 and 4.43);
- research activity — including market research, concept testing and creative testing — informing the development of the campaign (see paragraphs 4.10 and 4.56); and
- target recipients being clearly identified (see paragraphs 4.48 and Appendix 6).

4.66 With respect to campaign cost-effectiveness, the AEC received and followed advice from the Master Media Agency (Universal McCann) regarding the placement of advertising materials and media partnerships. This included a greater media spend compared to the 2022 federal election advertising campaign due to the need identified in the developmental research for the Education phase.²²⁹ The AEC assessed potential media partnership providers on their ability to deliver neutrality (see paragraph 4.62) and engage with the target audiences.²³⁰ The AEC also received and followed advice regarding advertising, media partnerships and public relations activities targeting CALD audiences and public relations activities for Aboriginal and Torres Strait Islander audiences from the providers of those services.²³¹

4.67 The campaign was evaluated to determine its effectiveness (see paragraphs 4.79 to 4.85).

Principle 5 — Compliant with legal requirements and procurement policies and procedures

Legal requirements

4.68 Principle 5 of the 2022 Guidelines states:

29. The manner of presentation and the delivery of campaigns must comply with all relevant laws including:
- a. laws with respect to broadcasting and media;
 - b. privacy laws;
 - c. intellectual property laws;
 - d. electoral laws;
 - e. trade practices and consumer protection laws; and
 - f. workplace relations laws.

229 The total recommended media buy was \$25.1 million (GST exclusive), compared to \$17.5 million (GST exclusive) for the 2022 federal election campaign.

230 This included assessing the providers' ability to achieve 'cut-through' in the information landscape at the time, connect with target audiences at a necessary scale and amplify across multiple channels.

231 Service providers are listed in Table 4.1 and Table 4.4.

4.69 Paragraph 19 of the 2022 Guidelines states:

Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.

4.70 The mandatory checklists provided to the Electoral Commissioner, at both certification stages, stated the following for Principle 5:

Legal Services Section reviewed campaign materials at several key points. All materials were deemed compliant with electoral laws and authorisation requirements. Compliance with other laws is considered by the contractors engaged to prepare the advertisements.

4.71 On 16 August 2023, the AEC Communications team requested advice from the AEC Legal Services team on the campaign's compliance with all laws listed under Principle 5. This was four days before the campaign was launched and two days before the first certification by the Electoral Commissioner. On 20 September 2023, the AEC Legal Services team provided advice that the campaign was compliant with all laws mentioned in Principle 5, nine days after the second certification. A revised version of the mandatory checklist was prepared that included wording reflecting the full review of laws listed in Principle 5. The revised mandatory checklist was not reviewed by the Electoral Commissioner.

Authorisation requirements

4.72 The AEC has developed its own guidance relating to authorisation requirements for AEC campaigns. The guidance provides specific instructions on what authorisation statements are to be included in different forms of advertisements and the form the statements should take.²³² Advertising materials contained appropriate authorisation statements.

4.73 As discussed in paragraphs 2.33 to 2.35, Finance has provided advice to individual entities on the need for 'attribution' of entities' funding of, or contribution to, media partnership and influencer materials.²³³ The AEC did not document attribution requirements for media partnership or public relations materials. The AEC podcasts and Snapchat filter with quiz questions contained attribution of the AEC's involvement. Public relations materials contained the same authorisation statements as the advertisements, except for the CALD media kit and materials from two presentations.²³⁴

Opportunity for improvement

4.74 The AEC could develop guidance on attribution requirements for media partnerships and public relations materials.

²³² The AEC does not follow the authorisation requirements established in the information sheet developed by the Department of Finance (see paragraphs 2.31–2.32).

²³³ 'Attribution' is an acknowledgement of entity or Australian Government involvement in, and contribution to, campaign materials.

²³⁴ The CALD media kit included the statement 'From Cultural Perspectives on behalf of the Australian Electoral Commission'. The two presentations were a CALD media briefing and multicultural stakeholder briefing. They included the statement 'Delivered by: Representatives from the Australian Electoral Commission and Cultural Perspectives'.

Procurement policies and procedures

4.75 The 2022 Guidelines state:

30. Procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers are to be followed, and there must be a clear audit trail regarding decision making.

4.76 As discussed in paragraphs 4.2 to 4.4, the AEC has had an exemption from the Guidelines and associated review and approval arrangements for government advertising campaigns. This includes an exemption from use of the Government Communications Campaign Panel, the whole-of-government evaluation supplier and the village model of campaign development.²³⁵ For the Your Answer Matters campaign, the AEC used its own panels of suppliers²³⁶ and Universal McCann.

4.77 Table 4.4 lists the suppliers engaged for the Your Answer Matters campaign.

Table 4.4: Suppliers used in procurements for the Your Answer Matters campaign^a

Research	Creative	Aboriginal & Torres Strait Islander communications	Multicultural communications	Evaluation
ORIMA Research	BMF	Carbon Creative	Cultural Perspectives	Wallis Social Research

Note a: The AEC did not engage a public relations supplier for the Your Answer Matters campaign.

Source: AEC documentation.

4.78 The AEC completed sole source limited tender procurements with each of these suppliers. For each procurement, the ANAO assessed the AEC's compliance against selected requirements of the Commonwealth Procurement Rules.²³⁷ One of the 16 procurements was not reported correctly on AusTender.²³⁸ All other procurements were assessed as compliant.

²³⁵ Use of these arrangements is mandatory for other non-corporate Commonwealth entities.

²³⁶ These panels were established for AEC advertising campaigns and included separate panels for: developmental market research services (SON3061772, one supplier); creative advertising services (SON3673030, one supplier); specialist indigenous communications advice and services (SON3327595, four suppliers); CALD campaign communications (SON3737569, one supplier); and campaign evaluation market research services (SON3979304, one supplier). The AEC also had a panel for public relations services (SON3722275, one supplier).

²³⁷ The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days. These requirements were consistent in the versions of the CPRs in place at the time of the procurements (this includes versions updated on 1 July 2022 and 13 June 2023).

²³⁸ The value of a contract with Carbon Creative (CN3974005) was incorrectly reported on AusTender.

Was the campaign evaluated to determine its effectiveness?

The Your Answer Matters campaign was evaluated to determine its effectiveness. Of the 23 objectives across the five phases of the campaign, 16 were assessed as 'met', six were assessed as 'partly met' and one was assessed as 'not met'.

The performance of the campaign was monitored against media metrics, including key performance indicators (KPIs). The AEC received weekly reporting on the performance of media channels.

4.79 The 2022 Guidelines require that 'campaigns are evaluated to determine effectiveness'. The AEC contracted a social research supplier (Wallis) for the evaluation of the Your Answer Matters campaign. Wallis provided:

- a pre-campaign benchmark report;
- three inflight evaluations;
- a 'post measure' evaluation²³⁹; and
- a final evaluation report.

4.80 There was a total of 23 campaign objectives across the five phases of the campaign. All 23 objectives were addressed in the final evaluation report. Sixteen objectives were assessed as having been 'met', six were assessed as 'partly met' and one was assessed as 'not met'. Results for each objective are listed in Appendix 5.²⁴⁰

4.81 The final evaluation report stated:

The Education phase was successful in building knowledge and awareness generally, and in several areas for the First Peoples priority audience in particular.

...

Understanding of enrolment was high and maintained over the campaign phase

...

Understanding of voting options improved at Voter Services, and there was an increasing sentiment that participation in the referendum would be simple.

...

There was substantial improvement in understanding how to vote correctly, and intent to cast a formal vote was high and maintained.

...

Disinformation was a concern among respondents. The campaign assisted respondents to take positive action to check the source of information.

239 The post measure evaluation was conducted from 16 to 27 October 2023, after the referendum campaign concluded.

240 In August 2024 it was reported in the media that a subcontractor of Wallis Social Research, McNair yellowSquares, had fabricated location data for Aboriginal and Torres Strait Islander peoples when conducting surveys. The AEC advised the ANAO in October 2024 that:

we can confirm the alleged falsification of postcodes was a very small portion of the overall survey data. As there were no postcode targets it has no impact on the findings of the benchmark, tracking and evaluation research.

4.82 The supplier engaged by the AEC to deliver CALD communications services also provided a report after the campaign had finished that included information on the performance of the CALD communications during the campaign. The AEC also prepared campaign summaries containing data on the campaign's performance with Aboriginal and Torres Strait Islander audiences; CALD audiences; and young voters.

4.83 In December 2023, evaluation results were presented to the AEC's ELT. Evaluations of AEC campaigns are not reported to the Government Communications Subcommittee due to the AEC's exemption from government review and approval arrangements (see paragraph 4.3).

Monitoring against media metrics

4.84 Universal McCann monitored established media metrics during the campaign through:

- weekly reporting on the performance of the media channels, including information about their reach and cost per impression; and
- a final media performance report.

4.85 The final media performance report included data on the performance of advertising and media partnerships for each campaign phase against KPIs. The report included key learnings for the campaign as a whole and recommendations specific to different communications channels for consideration in future campaigns.²⁴¹

241 Examples included retaining the use of podcasts, which were downloaded 116,173 times (against a forecast of 15,000) and generated 3.6 million social media impressions (against a forecast of 800,000).

5. Youth Vaping Education (phase one) campaign

Areas examined

This chapter provides an overview of the Department of Health and Aged Care's (Health) Youth Vaping Education (phase one) campaign and examines whether Health complied with the Australian Government's campaign advertising framework (the framework).

Conclusion

Health was largely compliant with the framework.

Health largely complied with the review, certification and publication requirements of the framework.

Health complied with the requirements of Principles 1, 3 and 4 of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, December 2022 (2022 Guidelines) and largely complied with Principles 2 and 5 of the 2022 Guidelines. Health did not document how campaign imagery reflected a diverse range of Australians. Not all campaign materials contained attribution of Australian Government involvement.

Health evaluated the Youth Vaping Education (phase one) campaign to determine its effectiveness. The evaluation report consolidated the campaign's original seven objectives into four objectives. The evaluation found that two objectives were achieved and two objectives were partially achieved.

Areas for improvement

The ANAO identified two opportunities for improvement. These relate to: documenting how a diverse range of Australians are reflected in campaign imagery; and ensuring campaign materials contain appropriate attribution of Health's involvement.

5.1 As a non-corporate Commonwealth entity conducting advertising and information campaigns, Health is required to comply with the framework. To examine whether Health complied with the requirements of the framework, the ANAO assessed Health's:

- processes of campaign review, certification and publication;
- compliance with the principles outlined in the Guidelines; and
- evaluation of the campaign's effectiveness.

Campaign overview

5.2 In the 2023–24 Federal Budget, the Australian Government committed:

\$63.4 million over 4 years from 2023–24 for national public health campaigns to prevent uptake and reduce smoking and vaping, including additional funding provisioned in the Contingency Reserve for a targeted youth campaign.²⁴²

5.3 The national ‘Youth Vaping Education (phase one) campaign’ (the campaign) was developed and administered by Health. The campaign commenced on 5 February 2024 and final campaign materials were published on 27 June 2024.²⁴³ Phase two of the Youth Vaping Education campaign is not in the scope of the audit.²⁴⁴

5.4 The campaign was subject to the December 2022 *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2022 Guidelines). The campaign summary is at Table 5.1.

Table 5.1: Summary of the Youth Vaping Education (phase one) campaign^a

Campaign summary	
Objective	<p>The aim of the national campaign was to ‘reduce vaping prevalence among priority and at-risk populations aged 14-18 years by increasing awareness of the negative health impacts, preventing uptake and increasing attempts to quit.’</p> <p>The campaign stated it had seven objectives, which were:</p> <ul style="list-style-type: none"> • Increase awareness of vaping harms. • Increase awareness of cessation support services available for young people. • Inform young people, their parents, carers and communities about the harms of vaping, including addiction/dependence and the immediate and long-term physical and mental health impacts. • Inform young people, their parents, carers and communities on how to recognise the signs and symptoms of nicotine addiction/dependence and withdrawal. • Reinforce decisions not to vape. • Increase young people’s intention to reduce and cease vaping. • Empower parents, carers, and communities to support young people to not vape.
Call to action	To visit health.gov.au/vaping website to seek further information.

242 Australian Government, *Budget Paper No. 2: Budget Measures 2023–24*, Commonwealth of Australia, Canberra, 2023, p. 154, available from https://archive.budget.gov.au/2023-24/bp2/download/bp2_2023-24.pdf [accessed 15 August 2024].

The funding was complemented by the *Public Health (Tobacco and Other Products) Act 2023*, which includes a prohibition on publishing e-cigarette advertisements (section 42).

243 Health advised the ANAO in August 2024 that the campaign end date was 30 June 2024. The final campaign materials were published on Health’s social media channels on 4 July 2024.

244 Health advised the ANAO in October 2024 that ‘Phase two of the campaign commenced on 9 June 2024 with advertising scheduled to run to 30 November 2024 and public relations activities running until June 2025’. Its target audience is young people aged 14 to 24 years and aims to encourage them to stop vaping by ‘focusing on the social benefits of quitting together’. Phase two is not in scope of the audit.

Campaign summary	
Timing	Phase one: 5 February–30 June 2024 ^b to align with the commencement of the new school year
Target audience	<p>Primary audiences: young people aged 14 to 18 years at risk of vaping or currently vaping, Aboriginal and Torres Strait Islander peoples and culturally and linguistically diverse (CALD) communities.</p> <p>Secondary audiences were stated as:</p> <ul style="list-style-type: none"> • young people aged 14–18 years who have ceased vaping • parents and carers of young people aged 14–18 years • teachers, coaches and other influential adults in the lives of young people aged 14–18 years.
Campaign activities	<p>Media partnerships, managed by the whole-of-government Master Media Agency, Universal McCann (UM).</p> <p>Influencer marketing strategy, managed by the public relations supplier, Fenton Communications.</p>
Total campaign budget (GST exclusive)	\$1.2 million ^c
Total campaign expenditure (GST inclusive)	\$1.3 million ^c
Media expenditure (GST inclusive)	\$0.6 million
Supplier expenditure (GST inclusive)	<p>Total: \$0.7 million, including:</p> <p>Phase one:</p> <ul style="list-style-type: none"> • Research — Kantar Public^d: \$0.1 million^e; and • Public Relations — Fenton Communication: \$0.6 million.

Note a: Figures are rounded to one decimal place. Discrepancies between totals and sums of components is due to rounding.

Note b: The final campaign materials were published on Health's website and social media channels on 4 July 2024.

Note c: As outlined in Note e, Health allocated \$100,000 of the developmental research expenditure for the National Tobacco and E-cigarette campaign to the Youth Vaping Education (phase one) campaign.

Note d: Kantar Public is now known as Verian.

Note e: Development research for the Youth Vaping Education (phase one) campaign and National Tobacco and E-cigarette campaign was undertaken under the same contract, which had a value of \$1.3 million (GST inclusive). Health advised the ANAO in August 2024 that \$100,000 of the contract was allocated to development research for phase one of the campaign. Development research is discussed in paragraph 5.6.

Source: ANAO analysis of Health and Department of Finance documentation.

Campaign development and approval

5.5 Under the Department of the Prime Minister and Cabinet (PM&C) circular (see paragraph 1.8), prior to initiating a campaign with a budget of more than \$250,000 (exclusive of GST), responsible ministers are required to seek authority from the Minister for Finance. The Minister for Finance approved the campaign's initiation on 3 September 2023.

5.6 Developmental research for the campaign was undertaken with 209 young people aged 14 to 24 years and parents/carers of young people by an external provider (Kantar Public) between

December 2023 and January 2024.²⁴⁵ The developmental research included seeking to understand young people’s views on vaping and reasons why young people may choose to vape.

Campaign funding

5.7 As discussed in paragraph 5.2, \$63.4 million was announced over four years from 2023–24 in the 2023–24 Federal Budget for national public health campaigns to prevent uptake and reduce smoking and vaping. The Youth Vaping Education (phase one) campaign budget was \$1.2 million (GST exclusive).

Campaign materials

5.8 The campaign materials used were media partnerships and public relations materials, as outlined in Table 5.2.

Table 5.2: Youth Vaping Education (phase one) campaign materials, by type^a

Advertisements	Media partnerships	Public relations materials
0	28	14

Note a: For an outline of different types of campaign materials, see paragraph 2.22.

Source: ANAO analysis of Health documentation.

5.9 The 28 media partnership materials were created across partnerships with Spotify²⁴⁶ and Year13.²⁴⁷ Spotify created a ‘vape version’ of a song²⁴⁸ and one in-app experience.²⁴⁹ Year13 created eight videos²⁵⁰, five articles, three posters, six social media posts, an electronic direct mail banner, a lesson plan, a newsletter article and a LinkedIn announcement.

5.10 The 14 public relations materials consisted of videos, including three Twitch²⁵¹ streams, created by nine influencers.²⁵² Each influencer created between one and three videos.

5.11 The roll out of campaign materials occurred gradually. Spotify’s in-app experience was released on 5 February 2024 and the ‘vape version’ was released on 29 February 2024. The Year13 content was published between 5 February 2024 and 2 April 2024. The influencer videos were published between 28 March 2024 and 4 July 2024 on Health’s social media channels. Examples of campaign materials are depicted in Figure 5.1.

245 Kantar Public ‘conducted a parallel project on adult vaping and smoking among 18+ year olds’ and some crossover insights were referenced in the report regarding people aged 14 to 17 years and parents and carers of young people. Kantar Public defined young people as those aged between 14 to 24 years.

246 Spotify is a digital music, podcast and audiobook streaming service.

247 Year13 is a youth engagement platform that provides life skills, wellbeing and career related services and information.

248 The ‘vape version’ involved a song being interrupted with a message from the artist around the negative health impacts of vaping.

249 The in-app experience, called ‘Vape and you’ll miss it’, featured an interactive quiz in which participants were asked about their use of vapes and presented facts on the impact of the behaviour based on those responses.

250 Health advised ANAO that one of the eight videos was removed. See footnote 267.

251 Twitch is an interactive live streaming service for video content, particularly video games. Two social media influencers used Twitch as the platform to communicate the Youth Vaping Education (phase one) campaign’s message.

252 Two influencers, Zahlia and Shyla Short, created content together and were referred to as the ‘Short sisters’.

Figure 5.1: Examples of Youth Vaping Education (phase one) campaign media partnerships and public relations materials^a



Note a: Clockwise from top left: influencer (JackBuzza), influencer (Ella Watkins), influencer (Lottie Dalziel) and media partnership (Year13).

Source: Health documentation.

Were the necessary review, certification and publication requirements undertaken?

Health's Youth Vaping Education (phase one) campaign received government approvals in accordance with the framework requirements applying at the time it was considered.

The accountable authority, the Secretary of the Department of Health and Aged Care (Secretary of Health and Aged Care), certified that the campaign complied with the five 'overarching principles' of the 2022 Guidelines and the certification was published on Health's website, as required. The Secretary's certification was informed by a third-party review from the Independent Communications Committee (ICC), as required by the 2022 Guidelines, and Health advice on compliance. Health provided the Secretary's certification to the Minister for Health and Aged Care on 3 May 2024, approximately three months after the campaign commenced, which was not compliant with the 2022 Guidelines.

Health complied with publication requirements. Health published the campaign developmental research report on its website.

Review by the Australian Government and Independent Communications Committee

5.12 On 11 December 2023, the government reviewed the integrated communications strategy, media strategy and media plan for the campaign. Health included media partnerships in its media strategy and indicated that it would prepare a public relations strategy centred on social media influencers. There was no creative concept or concept testing research at this review stage.²⁵³ The government agreed for the campaign to proceed to further development and to book media placement for the media partnerships. The government agreed that Health return with the strategy for social media influencers, at a future time.

5.13 On 18 January 2024, the ICC considered the campaign, as required by the 2022 Guidelines, and 'concluded the proposed Youth Vaping Education (phase one) campaign is capable of complying with Principles 1 to 4 of the Guidelines'.²⁵⁴

5.14 On 29 January 2024, the government considered the finalised influencer marketing strategy and content approach. Health submitted media partnership proposals, which described potential media partnership materials. Five of the 28 media partnership materials had been created and were presented for review at this stage and none of the influencer materials had been created, so were unable to be reviewed.²⁵⁵ Typically at this stage of campaign development, the government reviews the final creative materials and refinement research. The government agreed for the media partnership and influencer strategies to be implemented and for the campaign to commence.

253 Creative concepts and associated concept testing are standard features of advertising campaigns. Health's campaign was centred around media partnerships and social media influencers, so there was no advertising concept or associated concept testing because these channels had established ways of communicating with the target audience.

254 Compliance with Principle 5 is considered by the accountable authority, which in this context is the Secretary of Health and Aged Care, see paragraph 19 of the 2022 Guidelines.

255 The five available media partnership materials were three posters, one article and one in-app experience (interactive feature within an application). These materials were not required to be reviewed at this stage of the GCS process.

Secretary's certification

5.15 On 11 January 2024, Health's Communication Branch submitted a certification pack to the Secretary of Health and Aged Care seeking agreement to the Accountable Authority Certification Statement, as required by paragraph 19 of the 2022 Guidelines. The certification pack included a Statement Against the Principles, ICC compliance advice, legal advice, media partnership proposals and 'technical clearance' of messaging from policy and medical senior executives²⁵⁶ in order to satisfy all five principles under the 2022 Guidelines. The Secretary of Health and Aged Care was provided with the five finalised media partnership materials that were provided for government review (see paragraph 5.14) and no finalised influencer materials.²⁵⁷ On 31 January 2024, the Secretary of Health and Aged Care signed the certification.

5.16 The Youth Vaping Education (phase one) campaign commenced on 5 February 2024 and was launched by the Minister for Health and Aged Care on 28 February 2024.²⁵⁸

5.17 The 2022 Guidelines state that 'The Accountable Authority will provide the certification to the relevant Minister who may launch the campaign or approve its launch.' Health provided the Secretary's signed certification to the minister on 3 May 2024, more than three months after the Secretary's certification was signed. Health advised the ANAO in June 2024 that the Secretary's certification:

was provided after the campaign launch due to competing priorities with phase one and phase 2 of the campaign progressing concurrently. The Minister's Office was aware the campaign had been certified via meetings with advisers prior to launch.

Publication processes

5.18 The 2022 Guidelines include the following publication requirements:

19. For advertising campaigns of \$250,000 exclusive of GST or more:

...

- The Accountable Authority certification will be published on the relevant entity's website when the campaign is launched.
- The compliance advice of the Independent Communications Committee will be published on Finance's website after the campaign is launched.

...

22. Accountable Authorities will ensure that:

- research reports for advertising campaigns with expenditure of \$250,000 exclusive of GST or more are published on their entity web site following the launch of a campaign where it is appropriate to do so; and

256 Health obtained 'technical clearance' that materials were accurate and verifiable from the: First Assistant Secretary, Population Health; Deputy Chief Medical Officer for Mental Health; and the Chief Medical Advisor. This is further discussed in paragraph 5.31.

257 In September 2024, Finance updated its guidance to clarify that certification requirements applied to both advertising and non-advertising activities, including public relations (see paragraph 2.28).

258 Health advised the ANAO in August 2024 that the campaign started with 'media partnership activity to align with the start of the new school and university year' and the Minister's launch 'coincided with the 1 March vaping regulatory changes' and finalisation of arrangements with the participating influencers.

- details of advertising campaigns undertaken will be published in entity annual reports.

5.19 Specific requirements for publication of campaign information in entity annual reports are included in paragraph 17AH(1)(a) of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.²⁵⁹

5.20 Table 5.3 outlines how Health complied with the publication requirements.

Table 5.3: Compliance with publication requirements

For publishing	Complied
Accountable authority certification ^a	●
ICC compliance advice ^a	●
Annual report ^b	●
Publication of research reports ^c	●
<i>Campaign Advertising by Australian Government Departments and Entities Report 2023–24</i> ^d	Unable to verify ^e

Key: ● Health complied with the publication requirement.

Note a: Paragraph 19 of the 2022 Guidelines.

Note b: Subparagraph 17AH(1)(a)(i) of the PGPA Rule and subsection 311A(1) of the *Commonwealth Electoral Act 1918*.

Note c: Paragraph 22 of the 2022 Guidelines.

Note d: Paragraph 21 of the Guidelines states that ‘The Government will provide reports to the Parliament that detail expenditure on all advertising campaigns with expenditure in excess of \$250,000 exclusive of GST commissioned by PGPA Act entities.’ As discussed in paragraphs 2.81 to 2.82, Finance relies on information provided by entities that have undertaken advertising campaigns for this reporting.

Note e: Health combined reporting for Phases 1 and 2 of the Youth Vaping Education campaign.

Source: ANAO analysis of Health information.

5.21 The Secretary’s certification was published on Health’s website on 2 February 2024, prior to the campaign commencing, as required by the 2022 Guidelines. The Department of Finance (Finance) published the ICC’s compliance advice on its website after the campaign commenced, as required by the 2022 Guidelines.

5.22 Health published the details of the advertising campaign in its 2023–24 annual report in compliance with the PGPA Rule. The wording Health used varied from the wording included in the PGPA Rule, with the inclusion of the following additional wording ‘which were certified by the Secretary in line with the Guidelines on Information and Advertising Campaigns where required’. The change did not have a material effect.

259 Subparagraph 17AH(1)(a)(i) of the PGPA Rule requires that entities that have undertaken advertising campaigns include in their annual reports:

a statement that “During [reporting period], [name of entity] conducted the following advertising campaigns: [name of advertising campaigns undertaken]. Further information on those advertising campaigns is available at [address of entity’s website] and in the reports on Australian Government advertising prepared by the Department of Finance. Those reports are available on the Department of Finance’s website.”

5.23 Health’s exploratory and developmental research was published on Health’s website.²⁶⁰ As stated in paragraph 5.18, the 2022 Guidelines refer to the publication of research reports for advertising campaigns with expenditure of \$250,000 (exclusive of GST) or more where it is appropriate to do so. Health sought ministerial approval before publishing the campaign research report.

Were the principles of the framework adhered to?

Health complied with Principles 1, 3 and 4 and largely complied with Principles 2 and 5 of the 2022 Guidelines.

For Principle 2, Health did not document how campaign imagery reflected a diverse range of Australians. Legal advice provided in support of compliance with Principle 5 addressed the media partnerships component of the campaign but not the influencer component. Seventeen of the 28 media partnership materials did not contain attribution of Australian Government contribution to the materials. Health’s audit trail of procurement decision-making was mostly complete.

5.24 The five principles entities must comply with when undertaking campaigns are listed in paragraph 1.3 of this report. The 2022 Guidelines provide information under each of the principles to illustrate how entities can demonstrate compliance.²⁶¹ This information is framed as ‘considerations’ that could evidence compliance with the principles.

Principle 1 — Relevant to government responsibilities

5.25 One of the ‘considerations’ for demonstrating compliance with Principle 1 of the 2022 Guidelines is that: ‘The subject matter of the campaign directly relates to the Government’s responsibilities’. The Administrative Arrangements Order states that the matter of ‘Public health, including health protection, and medical research’ is the responsibility of Health.²⁶²

5.26 The Statement Against the Principles prepared by Health’s Communication Branch stated that the campaign’s intent was to:

provide information on government programs or services or revisions to programs or services to which the public are entitled; inform consideration of issues; disseminate scientific, medical or health and safety information.

5.27 This was consistent with the examples of suitable uses for government campaigns listed in the 2022 Guidelines.

260 The research covered both the Youth Vaping Education campaign and the National Tobacco and e-cigarette campaign. See Department of Health and Aged Care, *National Tobacco and E-Cigarette and Youth Vaping – Campaign Developmental Research*, Health, Canberra, 2024, available from <https://www.health.gov.au/sites/default/files/2024-11/national-tobacco-and-e-cigarette-and-youth-vaping-campaign-developmental-research-report.pdf> [accessed 22 November 2024].

261 See paragraph 12 of the 2022 Guidelines for interpretation and paragraphs 23–30 of the 2022 Guidelines for the five principles.

262 According to the PM&C website, ‘The Administrative Arrangement Order specifies the names of departments of state, the principal matters they deal with and the legislation administered within each portfolio.’ Department of the Prime Minister and Cabinet, *Administrative Arrangement Orders*, PM&C, Canberra, 2024, available from <https://www.pmc.gov.au/government/administration/administrative-arrangements-orders> [accessed 27 September 2024].

Principle 2 — Presented in an objective, fair and accessible manner

5.28 In the 2022 Guidelines, there are seven ‘considerations’ for demonstrating compliance with Principle 2, which cover campaign content, accessibility of campaign materials and campaign testing.

Campaign content

5.29 The 2022 Guidelines describe the four ‘considerations’ for demonstrating compliance with the campaign content element of Principle 2:

- The recipients of the information can distinguish between facts, comment, opinion and analysis;
- Information presented as a fact, is accurate and verifiable;
- The basis of factual comparisons is clear and does not mislead the recipient about the situation;
- Pre-existing policies, products, services and activities are not presented as new; ...

5.30 As outlined in paragraphs 5.12, 5.14 and 5.15, limited media partnerships and public relations materials were reviewed as part of the government approval process and the Secretary’s certification, as most had not been created at the time.²⁶³ For media partnerships and public relations materials, the ANAO assessed whether Health had adequate processes in place to ensure materials met the objectivity requirements of Principle 2.

5.31 Health developed a document of overarching campaign statements that was subject to ‘technical clearance’ by policy and medical senior executives.²⁶⁴ The document included statements that would be used in media partnership materials and similar statements were included in a ‘Facts about vaping’ document, which Health advised the ANAO in August 2024 was to be provided to the influencers.

5.32 The public relations supplier (Fenton Communications) created a briefing document for influencers that included talking points, content direction and content approval process. Health also created a briefing document for influencers on pro-vaping messaging and tips for managing negative comments and abusive behaviour. Fenton Communications created a separate brief for the influencers that used Twitch. The brief included talking points, links to resources, suggestions for ‘seeding content’ such as adding polls and video clips to live streams, things to avoid saying and suggestions for managing audience interactions, including with audience members who supported vaping.

5.33 Arrangements were established by Health to enable it to review and approve content produced by the media partnerships and influencers, except for influencer materials streamed on Twitch²⁶⁵, prior to its publication. This provided Health the opportunity to ensure materials met the objectivity requirements of Principle 2.

5.34 Health did not have a documented process for reviewing media partnership materials prior to their publication. Health advised the ANAO in August 2024, that the review process for media

263 Five of the 28 media partnerships had been created and none of the influencer materials had been created.

264 See footnote 256 for further details.

265 This was due to Twitch being a live streaming platform. There was an option to end the stream due to pro vaping or negative comments.

partnership and influencer materials involved review and fact checking prior to approval by its policy and communications senior executives. There was documentation of review of all the media partnership materials²⁶⁶ and for 11 of the 14 public relations (influencer) materials.²⁶⁷

Accessibility of campaign materials

5.35 The 2022 Guidelines, describe the two ‘considerations’ for demonstrating compliance with the accessibility of campaign materials element of Principle 2.

- Special attention is paid to communicating with disadvantaged individuals or groups identified within the target audience. Particular attention is paid to meeting the information needs of Aboriginal and Torres Strait Islander Australians, the rural community, people with disability and those for whom English is not a convenient language in which to receive information;
- Imagery used in campaigns appropriately reflects the diverse range of Australians. Where it is consistent with the campaign objectives, this includes the realistic portrayal of the full participation of women, Aboriginal and Torres Strait Islander Australians, culturally and linguistically diverse communities and people with disability; ...

5.36 The main campaign target audience was young people aged 14 to 18 years, Aboriginal and Torres Strait Islander audiences and CALD audiences. The use of paid partnerships and influencers was designed to reach the age demographic targeted by the campaign. Health’s Statement Against the Principles stated that the media partnerships (Spotify and Year13) were also ‘selected based on their ability to reach and engage with First Nations and multicultural audiences to ensure the needs of these audiences are prioritised’. Based on the developmental research, Health did not consider there to be a need for dedicated materials or communications channels for Aboriginal and Torres Strait Islander or CALD audiences.²⁶⁸

5.37 The Statement Against the Principles stated, ‘The department will work with Universal McCann and the paid media partners to ensure the media buy reflects the communication needs of regional, rural and remote audiences.’ The communication needs of these audiences were not referred to in the media strategy.

266 Twenty-six of the 28 partnership materials were reviewed by a policy senior executive and 23 of the 28 materials were reviewed and approved by a communications senior executive. Health reviewed and approved one TikTok Video that was later removed.

267 Eleven of the 14 influencer materials were reviewed by a policy senior executive and a communications senior executive. Due to the live nature of Twitch, the three streams could not be reviewed or approved in advance. The ‘Vape ingredient or made-up word’ video was removed during the campaign. Health advised the ANAO in November 2024 that the video was published on 9 February 2024 and taken down on 14 February 2024.

268 Campaigns often include materials adapted for Aboriginal and Torres Strait Islander audiences and placed in communication channels dedicated to these audiences. Campaigns also often have materials translated into languages other than English and placed in communication channels targeting CALD audiences. Health’s Statement Against the Principles stated:

Developmental research indicates the same norms, biases and sense of social acceptability related to vaping appear to cut across all groups, irrespective of cultural or First Nations background.

ABS data shows English language proficiency is very high among young people from multicultural backgrounds living in Australia, as well as young people who are new migrants.

5.38 The Statement Against the Principles stated:

Key content developed for the campaign will be available in formats that meet the Australian Government’s access and equity requirements. This includes subtitles and closed captioning on all video assets ...

5.39 Four of the eight partnership video materials had subtitles, and seven of the eight had the option for closed captioning via TikTok.²⁶⁹ All 11 influencer videos had subtitles and the option for closed captioning via YouTube. None of the three Twitch streams had subtitles due to being live videos and one had closed captions, although these were inaccurate.²⁷⁰

5.40 Regarding imagery used in campaign materials, the Statement Against the Principles stated that ‘Campaign content will be developed to be inclusive of all audiences’. Thirteen of the 28 media partnership materials and all 14 influencer videos contained imagery of people. Health did not document how campaign imagery reflected a diverse range of Australians. Health advised the ANAO in October 2024 that:

This phase did not feature paid advertising where talent were selected - it was a content-led approach engaging influencers and media partners, which meant the influencers and media partners themselves were mainly featured in their content.

This was supported by developmental research ... which found the same norms, biases and sense of social acceptability related to vaping cut across all groups, irrespective of cultural or First Nations background.

...

Health considered the Year13 material contained appropriate imagery of people representative of diverse backgrounds and who were relatable to the target audience. Health and Fenton Communications considered a number of influencers including those with multicultural and First Nations backgrounds during the selection process. This was documented by Health and provided as evidence.²⁷¹

5.41 Health is responsible for ensuring campaign materials comply with the 2022 Guidelines, irrespective of the campaign format. Greater assurance could be provided regarding Health’s compliance with diversity requirements under Principle 2 by Health documenting how these requirements are met.

Opportunity for improvement

5.42 Health could document how a diverse range of Australians is reflected in campaign imagery.

Campaign testing

5.43 The 2022 Guidelines state that the ‘considerations’ for demonstrating compliance with the campaign testing element of Principle 2 is that:

269 One of the eight partnership videos was removed and was unable to be tested, see footnote 267.

270 The closed captions created incoherent sentences of random words.

271 Health provided the ANAO with Fenton Communications’ influencer recommendations, which did not include an assessment of diversity other than noting that ‘Additional influencers will be selected for phase 2 that include an additional mid-tier male influencer, greater diversity, and First Nations representation.’

Campaigns are tested with target audiences to indicate they are engaging and perform well against their objectives.

5.44 Health relied on advice from the master media agency (UM) and Fenton Communications to select the media partnerships and influencers respectively, on the basis that they engage effectively with the target audience. Health stated in the Statement Against the Principles that:

content developed under the media partnerships will be guided by development research, platform user insights and Spotify and Year 13s expertise in engaging with youth.

Given the volume of content developed, a traditional concept testing research approach will not be time or cost effective.

Principle 3 — Objective and not directed at promoting party political interests

5.45 The 2022 Guidelines describe two ‘considerations’ for demonstrating compliance with Principle 3:

- Language used in the campaign is objective language and is free of political argument; and
- Campaigns must not try to foster a positive impression of a particular political party or promote party political interests.

5.46 The 2022 Guidelines also state:

Campaigns must not:

- a. mention the party in Government by name;
- b. directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
- c. include party political slogans or images;
- d. be designed to influence public support for a political party, a candidate for election, a Minister or a Member of Parliament; or
- e. refer or link to the web sites of politicians or political parties.

5.47 In relation to Principle 3, the Statement Against the Principles stated that ‘Only information relevant to the campaign including vaping and cessation support will be included.’ Part of the arrangement with the whole-of-government master media agency (UM) was to avoid the placement of campaign content alongside political content.²⁷²

5.48 As discussed in paragraphs 5.33 to 5.34, Health reviewed the majority of media partnership and public relations materials prior to their distribution. The ANAO’s review found Health was compliant with Principle 3.

272 See paragraphs 2.38–2.44 for a discussion of UM’s role in ensuring brand safety for Australian Government campaigns.

Principle 4 — Justified and undertaken in an efficient, effective and relevant manner

5.49 The 2022 Guidelines describe the five ‘considerations’ for demonstrating compliance with Principle 4²⁷³:

- Campaigns are only instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence;
- Campaign information clearly and directly affect the interests of recipients;
- The medium and volume of the advertising activities is cost effective and justifiable within the budget allocated to the campaign;
- Distribution of unsolicited material should be carefully controlled; and
- Campaigns are evaluated to determine effectiveness.

5.50 For the Youth Vaping Education (phase one) campaign there was evidence of:

- a documented justification (see paragraph 5.2) and identification of target recipients (see Table 5.1);
- research activity, for developmental testing (see paragraph 5.6) but not concept testing (the reasons for this are discussed in paragraphs 5.12 and 5.44); and
- campaign information (campaign materials) directed to the interests of the identified recipients (see paragraph 5.36).

5.51 With respect to campaign cost-effectiveness, Health received and followed advice from UM for media partnership materials. Media partnerships were recommended by UM because they ‘provide unique ways to engage audiences through engaging, disruptive content’ and ‘partnerships will forge a strong social amplification and engagement strategy to maximise reach and relevance amongst the audience’.

5.52 Key Performance Indicators (KPIs) were agreed to by Health for media partnerships.

5.53 Fenton Communications developed a public relations strategy in response to Health’s request for quote. Fenton Communications recommended an influencer marketing approach for the following reasons²⁷⁴:

Third-party personalities, or ‘influencers’, have become a part of the landscape of media consumption for Australian teenagers. They follow influencers for a range of reasons, from insights into their private life, for entertainment value, special interests, and life commentary, tips and anecdotes. For many, watching influencer videos has become more important than watching traditional TV.

They also have an influential effect on Australian teens, whether it’s through directly promoting products or mimicking incidental behaviour (such as smoking or vaping).

273 See paragraph 28 of the 2022 Guidelines.

274 UM did not recommend influencers for the campaign ‘given the sensitivities of this campaign and potential for influencers to then be caught vaping or smoking in public’.

5.54 Previous Australian Government campaigns have been affected by negative media attention relating to the use of influencers.²⁷⁵ Health had processes to mitigate the risks associated with engaging influencers, which included the following.

- Creation of an Issues and Risk Register by the public relations supplier. This included the identification of risks and issues²⁷⁶ and associated residual risk and mitigation tactics.²⁷⁷ Health advised the ANAO in August 2024 that Health and Fenton Communications monitored the Issues and Risk Register but did not require additional updates during campaign.
- Checks of influencers by Fenton Communications, which included: social media content, influencer's reach and engagement on social channels and suitability (including media monitoring search and formal/informal affiliations).
- Separate checks of influencers by Health, which included a National Police Check, Australian citizenship check and review of social media activity and involvement in other campaigns or endorsements.
- A Talent Declaration Agreement that all nine influencers signed, which stated that they 'must declare that they do not currently use tobacco or e-cigarettes and do not intend to do so.'²⁷⁸ Health terminated the contract with one influencer prior to content being published because they were sighted with a vape on multiple occasions.
- Influencers were required to sign a conflict of interest form in which they had to affirm having no associations with tobacco or the e-cigarette industry.²⁷⁹
- A provision for Health to approve the influencers content before it was published or posted (see paragraph 5.33).

5.55 The Statement Against the Principles stated, 'No unsolicited materials will be distributed as part of this campaign.'

5.56 The final consideration for Principle 4 is the campaign evaluation activity, which is discussed from paragraph 5.75 to 5.82.

Principle 5 — Compliant with legal requirements and procurement policies and procedures

Legal requirements

5.57 Principle 5 of the 2022 Guidelines state that:

The manner of presentation and the delivery of campaigns must comply with all relevant laws including:

275 See paragraph 2.49.

276 The categories of risks/issues were: influencer engagement, messaging, campaign tone and content, stakeholder issues, and misinformation and conspiracy.

277 The Issues and Risk Register was part of a broader three step Issues Management Plan, which addressed: (1) planning and risk assessment; (2) briefing and contracts; and (3) content delivery and management.

278 Health Talent Declaration Agreement documentation contained missing or incomplete details of social media accounts for five influencers, the incorrect date accompanied the signature of one influencer and one influencer had their manager sign on their behalf.

279 There were three errors in the completion of conflict-of-interest forms with one influencer not having their signature witnessed and two influencers not having the witness date on the same day the influencer signed.

- a. laws with respect to broadcasting and media;
- b. privacy laws;
- c. intellectual property laws;
- d. electoral laws;
- e. trade practices and consumer protection laws; and
- f. workplace relations laws.²⁸⁰

5.58 Paragraph 19 of the 2022 Guidelines states:

Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.

5.59 Health engaged a legal service provider (MinterEllison) to provide legal advice regarding the campaign's compliance with Principle 5 of the 2022 Guidelines. MinterEllison was provided with a range of documents including briefing documents from Year13 and Spotify. Health also sought internal legal advice regarding agreements used to formalise engagement of influencers.

5.60 MinterEllison advice to Health dated 30 January 2024 noted that it had not been provided final campaign materials and could not advise whether the materials satisfied Principle 5's legal requirements and procurement policies and procedures. Health asked for 'in principle' advice based on available information and things to consider when finalising campaign material to ensure compliance with Principle 5, which MinterEllison provided.

5.61 Health advised the ANAO in June 2024 that no additional legal advice was sought.²⁸¹

5.62 The legal advice was provided to the Secretary of Health and Aged Care, with the certification minute, to demonstrate legal compliance with Principle 5.²⁸² The advice included:

- a recommendation that campaign materials reflect people from different backgrounds to minimise risk a particular racial or gender stereotype is being perpetuated (diversity in campaign imagery is discussed in paragraph 5.40); and
- the assumption that all of the produced campaign materials comply with the Australian Association of National Advertisers Code of Ethics (AANA Code).

5.63 Finance provided advice to Health in December 2023 on how to attribute materials by media partnerships and influencers. Finance advised that:

There are a few ways we could attribute content when/if using influencers or paid partnerships, it will depend on the platform used as well as the content design. Some ways that you can attribute include Sponsored by Australian Government or in Partnership with Australian Government or #Ad or #Sponsorship or #PaidPromotion. Of course, you can have the talent say it.

280 See paragraph 29 of the 2022 Guidelines.

281 Health advised the ANAO in June 2024 that:

As no advertising materials were to be produced, Minter Ellison provided advice on the potential areas of legal consideration for the campaign, along with recommendations to assist the Department in mitigating potential legal risks. The department considered the recommendations and addressed as relevant. No further advice was sought or received.

282 The certification process for the campaign is discussed in paragraph 5.15.

5.64 Finance advice also referred to section 2.7 of the AANA Code of Ethics, which states:

Where an influencer or affiliate accepts payment of money or free products or services from a brand in exchange for them to promote that brand’s products or services, the relationship must be clear, obvious and upfront to the audience and expressed in a way that is easily understood (e.g. #ad, Advert, Advertising, Branded Content, Paid Partnership, Paid Promotion).

5.65 Of the 28 media partnership materials, 11 had attributions²⁸³ and 17 did not contain any attribution of Australian Government contribution to the materials.²⁸⁴

5.66 Health advised the ANAO in August 2024 that for four of the videos and three of the posters that did not contain attributions:

Health provided advice regarding the ‘in partnership’ acknowledgement and use of the Department of Health and Aged Care logo (and the logo files) to UM on 23 January 2024. The four videos identified by the ANAO [that] do not have the ‘in partnership’ acknowledgement or Department of Health and Aged Care logo, which was an oversight by Health and UM.

5.67 Health further advised ANAO in October 2024 that:

The “in partnership” acknowledgement and Department of Health and Aged Care logo have not been applied to the three Year13 posters, as they appear on the Influencer and media partnership content webpage of the department’s campaign website. The QR code is the call to action that takes people to the campaign’s website, which infers the attribution to the partnership with Health. The Year13 newsletter articles also includes a QR code to the campaign’s website. Cxloe’s Vape Version includes the statement ‘Get the facts with the Department of Health of Aged Care’ which is an acknowledgement of Health’s contribution.

5.68 The 14 influencer videos, including three Twitch streams, all had attributions in line with Finance’s advice.

Opportunity for improvement

5.69 Health could improve its review process for media partnership materials to ensure they contain clear attribution of Health’s contribution.

Procurement policies and procedures

5.70 Paragraph 30 of the 2022 Guidelines states:

Procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers are to be followed, and there must be a clear audit trail regarding decision making.

283 Two of the attributions included the ‘Department of Health’ logo appearing alongside the partner’s logo. At the time Health’s official name was the Department of Health and Aged Care.

284 The materials that the ANAO assessed as not having an attribution were as follows.

- The vape version, which included the artist saying ‘Get the facts with the Department of Health and Aged Care’ but not attributing Health’s contribution to the material.
- The three Year13 posters and the newsletter article, which contained a QR code linking to Health’s website but no direct attribution of Health’s contribution in the content itself.
- Other Year13 videos and social media posts, which did not contain any reference to Health or indication that they were paid materials.

5.71 The campaign was assigned the ‘Health and Wellbeing Village’, which consists of the suppliers listed in Table 5.4, in addition to UM and the whole-of-government evaluation supplier (Hall & Partners).²⁸⁵

Table 5.4: Suppliers in the ‘Health and Wellbeing Village’

Research	Creative	Public relations	Aboriginal & Torres Strait Islander communications	Multicultural communications
Fifty-Five Five	Ogilvy Australia	Fenton Communications	Carbon Creative	Cultural Perspectives

Source: Department of Finance documentation.

5.72 Health procured services via sole source limited tender²⁸⁶ from UM and Fenton Communications and one supplier from a different village (Kantar Public).²⁸⁷ Hall & Partners and suppliers specialising in communicating with Aboriginal and Torres Strait Islander and CALD audiences were not engaged (see paragraph 5.36).

5.73 Health required suppliers to declare any interests in the tobacco or e-cigarette industries.²⁸⁸ Due to a conflict of interest being declared by the ‘Health and Wellbeing Village’ research supplier, Health issued a request for quote to the four other research suppliers in the Government Communications Campaign Panel and engaged Kantar Public.

5.74 For each procurement, the ANAO assessed Health’s compliance against selected requirements of the Commonwealth Procurement Rules (CPRs).²⁸⁹ Health was found to be compliant. Health had a mostly complete audit trail of decision-making for procurement.²⁹⁰

285 The village model is discussed in paragraphs 1.9 and 2.13–2.18.

286 The procurements were sole source limited tender procurements because entities are mandated suppliers through the village model.

287 Kantar Public is now known as Verian.

288 This applied to GCCP suppliers only, not UM. In an email to one supplier in the ‘Health and Wellbeing Village’, Health advised the following reason for checking for any real or perceived conflicts of interest:

The Australian Government is a party to the World Health Organization (WHO) Framework Convention on Tobacco Control, part of which places obligations on public officials to protect public health policies in relation to tobacco control from commercial and other vested interests of the tobacco industry.

289 The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days. These requirements were consistent in the versions of the CPRs in place at the time of the procurements (this includes versions updated on, 13 June 2023 and 1 July 2024).

290 Paragraph 30 of the 2022 Guidelines requires that ‘there must be a clear audit trail regarding decision making’. The ANAO’s review identified: one approval minute missing the approver’s signature and containing an incomplete approval checklist (related to CN4025999); a separate approval minute containing an incomplete approval checklist (related to CN4026891); and a procurement evaluation report not containing clear indication of approval (related to CN4026891).

Was the campaign evaluated to determine its effectiveness?

Health evaluated the Youth Vaping Education (phase one) campaign to determine its effectiveness. The evaluation report consolidated the campaign's original seven objectives into four objectives. The evaluation found that two objectives were achieved and two objectives were partially achieved.

Campaign performance was monitored against media metrics, including KPIs. Health received in-flight monitoring of the campaign's performance, including a report on the performance of influencers, a mid-campaign report and a final media performance report.

5.75 The 2022 Guidelines require that 'Campaigns are evaluated to determine effectiveness' and the PM&C circular (see paragraph 1.8) sets out expectations regarding the timeliness of evaluation. As discussed in Box 2 and paragraph 2.74, Finance has established mandatory procurement arrangements for government advertising evaluation services, under which Hall & Partners provides standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 (exclusive of GST) per financial year.²⁹¹ Health did not engage Hall & Partners for the campaign, citing concerns relating to the suitability of the whole-of-government evaluation arrangement for the campaign.²⁹²

5.76 As indicated in Table 5.1, the objectives of the Youth Vaping Education (phase one) campaign were to:

- Increase awareness of vaping harms.
- Increase awareness of cessation support services available for young people.
- Inform young people, their parents, carers and communities about the harms of vaping, including addiction/dependence and the immediate and long-term physical and mental health impacts.
- Inform young people, their parents, carers and communities on how to recognise the signs and symptoms of nicotine addiction/dependence and withdrawal.
- Reinforce decisions not to vape.
- Increase young people's intention to reduce and cease vaping.
- Empower parents, carers, and communities to support young people to not vape.

291 The Finance website states the following in relation to campaign evaluation:

Advertising campaigns are required to be evaluated using a whole-of-government campaign evaluation framework. A single supplier provides benchmarking, tracking and evaluation research services for all advertising campaigns with total budgets above \$500,000 per financial year. ... Under the agreed research framework, the supplier delivers formal evaluations of advertising campaigns undertaken by departments and agencies ...

See Department of Finance, *Campaign Evaluation*, Finance, Canberra, 2022, available from <https://www.finance.gov.au/government/advertising/campaign-evaluation> [accessed 13 August 2024].

292 Health advised ANAO in October 2024:

Discussions between Health, Finance and Hall and Partners highlighted concerns around the suitability of the whole of government evaluation model to capture meaningful insights in relation to this phase of the campaign. Concerns were also identified around the ability to achieve appropriate sampling outcomes across the life of the campaign tracking and limited timing for an initial phase of research. In this context it was concluded that no initial benchmarking was required and that the most appropriate course of action for analysis of this phase was for the UM and Fenton only to undertake evaluation of media partnerships and influencer activity conducted in this phase using the metrics available to them on the platforms on which the content was placed.

5.77 Health finalised its evaluation report in November 2024. In the evaluation report, the campaign’s original seven objectives were consolidated into four objectives:

Increase awareness of vaping harms, including nicotine addiction.²⁹³ ...

Increase awareness of cessation support services available for young people[.] ...

Reinforce decisions not to vape[.] ...

Increase young people’s intention to reduce and cease vaping.²⁹⁴

5.78 The evaluation found that the first two revised objectives were achieved and that the final two objectives were partially achieved.

Monitoring against media metrics

5.79 The campaign underwent inflight monitoring. UM provided Health with five activity reports regarding the media partnerships. The activity reports included data on campaign expenditure and KPI metrics such as impressions and clicks for both Spotify and Year13. One recommendation came out of activity reports, which Health implemented.²⁹⁵

5.80 The final media performance report included data on the performance of the media partnerships against KPIs. The report included key learnings²⁹⁶ and made three recommendations for Phase 2 of the campaign, including fit for platform creative which ‘speak to audiences in a peer-like way to drive authentic connection’.

5.81 Health monitored influencer materials and created a report with metrics from the campaign website, including the number of views of each influencer’s videos, return rates, the source of referrals to the website and the most popular pages.

5.82 Fenton Communications provided Health an evaluation report regarding the influencers’ component of the campaign. The report included metrics on the performance of, and engagement with, the social media posts. The report provided recommendations for the future engagement of influencers in Australian Government campaigns and stated ‘The strong results achieved in phase one support including additional influencer engagement in phase two and beyond.’



Dr Caralee McLiesh PSM
Auditor-General

Canberra ACT
14 March 2025

293 This included the objectives of: increase awareness of vaping harms; inform young people, their parents, carers and communities about the harms of vaping, including addiction/dependence and the immediate and long-term physical and mental health impacts; and inform young people, their parents, carers and communities on how to recognise the signs and symptoms of nicotine addiction/dependence and withdrawal.

294 This included the objective of Empower parents, carers, and communities to support young people to not vape.

295 The recommendation related to reallocation of funding within one of the partnerships.

296 Key Learnings were ‘Innovative media solutions drove engagement amongst young audiences’, Year13 ‘building assets for owned assets and contributed to the design and build of the campaign website’ and ‘TikTok did not allow Year13 to post content that featured vapes.’

Appendices

Appendix 1 Entity responses

Department of Finance



Australian Government
Department of Finance

Cath Patterson
A/g Secretary

Our Ref: EC24-001832

Dr Caralee McLiesh PSM
Auditor-General
Australian National Audit Office
38 Sydney Avenue
FORREST ACT 2601

Dear Dr McLiesh

I refer to the Australian National Audit Office's (ANAO's) correspondence of 10 December 2024, providing the proposed Audit Report, *Government Advertising: November 2021 to November 2024* pursuant to section 19 of the *Auditor-General Act 1997*.

I note and welcome the ANAO's conclusion that the Department of Finance has been effective in the whole-of-government administration of the Government's campaign advertising framework, including Finance's role in supporting entities, providing secretariat support to the Independent Communications Committee, meeting its requirements for reporting on campaign advertising expenditure by non-corporate Commonwealth entities, and having arrangements in place to manage brand safety risks relating to advertising on social media platforms.

Finance agrees the two recommendations directed to the Department.

Thank you for the opportunity to respond to the report.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Cath Patterson'.

Cath Patterson
A/g Secretary

9 January 2025

Attorney-General's Department



Australian Government
Attorney-General's Department
Acting Secretary

17 January 2025

Dr Caralee McLiesh PSM
Auditor-General for Australia
Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Dear Auditor-General

Proposed report under section 19 of the *Audit General Act 1997* on Australian Government Advertising: November 2021 to November 2024

Thank you for the opportunity to review the proposed audit report on Australian Government Advertising: November 2021 to November 2024, in particular the findings for the Attorney-General's Department's 'One Talk at a Time' campaign.

The department acknowledges the ANAO's overall conclusions and welcomes the recommendations.

The department notes the administrative areas identified for improvement, including record management practices for campaign activities and reviewing processes for media partnership materials to ensure proper Government attributions. We are committed to implementing these recommendations in future campaigns.

The department acknowledges the ANAO's finding that the campaign successfully achieved one objective and 'partially achieved' two others. However, the full evaluation of the campaign's effectiveness is yet to be completed and is expected to conclude in 2025, following the completion of below-the-line activities.

The department has provided a summary of our response along with editorial matters we wish to bring to the ANAO's attention, detailed in **Attachment A**.

If you would like further information on the department's response, please do not hesitate to contact Cameron Gifford, Chief Operating Officer on (02) 61413565 or cameron.gifford@ag.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Simon Newnham'.

Simon Newnham
A/g Secretary



Electoral Commissioner

Dr Caralee McLiesh PSM
Auditor-General, Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Dear Dr McLiesh,

AEC response to ANAO Proposed Audit Report - Australian Government Advertising: November 2021 to November 2024.

Thank you for the opportunity to respond to the Australian National Audit Office's *Proposed audit report on the audit of Australian Government Advertising: November 2021 to November 2024*.

The AEC acknowledges the ANAO's conclusion that it has largely complied with its internal requirements and the intent of the Australian Government's campaign advertising framework for the *Your Answer Matters* campaign.

As the report notes, since 2009, the AEC has had an exemption from the *Australian Government Guidelines on Information and Advertising Campaigns*, including exemption from review and approval of AEC campaigns by government. This is due to the need for campaigns on electoral events to be independent of government. Instead, the AEC has its own Guidelines and certification process.

The AEC **agrees** with the one recommendation in the report. For future campaigns, the AEC will obtain legal advice confirming compliance with all relevant laws in Principle 5 of the Guidelines prior to campaign certification by the Electoral Commissioner. In addition, the AEC will update its Guidelines to include appropriate version control and seek documented approval of the Guidelines by the Electoral Commissioner each electoral cycle.

The AEC **notes** the opportunities for improvement in the report. We will update our Guidelines accordingly, noting that the areas for improvement are administrative and do not compromise compliance with our Guidelines.

A summary of the AEC response, a response to Recommendation 3, together with editorial matters the AEC wishes to bring to the ANAO's attention as discussed with audit team, are provided at **Attachment A**.

10-12 Mort Street, Canberra ACT 2600 P 02 6271 4411

www.aec.gov.au

The AEC is committed to continual improvement and welcomes the report.

Yours sincerely

A handwritten signature in black ink, appearing to be 'JP', enclosed in a light grey rectangular box.

Jeff Pope APM
Acting Electoral Commissioner
20 January 2025

Department of Health and Aged Care



Australian Government
Department of Health and Aged Care

Acting Secretary

Caralee McLiesh PSM
Auditor-General for Australia
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Dr McLiesh

Department of Health and Aged Care (the department) response to the Proposed Audit Report – Government Advertising November 2021 to November 2024

Thank you for providing the Australian National Audit Office's (ANAO) proposed report pursuant to section 19 of the *Auditor-General Act 1997* on the audit of *Government Advertising November 2021 to November 2024*. I appreciate the opportunity to respond to the report.

I am pleased to note the ANAO's finding that the department was largely compliant with the Australian Government's campaign advertising framework.

I would like to thank the audit team for their constructive and professional engagement throughout this productive process. I view this audit as a valuable activity which will support the department's administrative processes when implementing future government advertising campaigns.

The department has considered the findings in the report and the opportunities for improvement identified by the ANAO.

The wording provided for the Summary Response can be found at [Attachment A](#).

If you have any questions regarding the department's response please contact Leonie Clemson, Assistant Secretary, Assurance Branch on (02) 5132 1452.

Yours sincerely

A handwritten signature in black ink that reads "Charles Wann".

Charles Wann
2 January 2025

Phone: (02) 6289 8400 Email: Blair.Comley@health.gov.au
Yaradhang Building, 23 Furzer Street, Woden ACT 2606 - GPO Box 9848 Canberra ACT 2601 - www.health.gov.au

Independent Communications Committee

INDEPENDENT COMMUNICATIONS COMMITTEE

Dr Caralee McLiesh PSM
Auditor General
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Dr Caralee McLiesh PSM

RE: Proposed Audit Report on Australian Government Advertising: November 2021 to November 2024

Thank you for the opportunity to review an extract of the Proposed Audit Report on Australian Government Advertising: November 2021 to November 2024, provided to the Independent Communications Committee (ICC) under section 19 of the *Auditor-General Act 1997*.

The Committee has no concerns with the findings that have been drafted as part of the Report.

I would like to thank and acknowledge members of the Audit team, James Sheeran, Susan Drennan and Michelle Page for their constructive and professional engagement with the Committee during the meeting of 6 September 2024.

Regards



Meredith Fairweather
Chair
Independent Communications Committee
20 January 2025

*c/o ICC Secretariat: Communications Branch,
Department of Finance
One Canberra Avenue, Forrest ACT 2600
iccsecretariat@finance.gov.au*

Appendix 2 Improvements observed by the ANAO

1. The existence of independent external audit, and the accompanying potential for scrutiny improves performance. Improvements in administrative and management practices usually occur: in anticipation of ANAO audit activity; during an audit engagement; as interim findings are made; and/or after the audit has been completed and formal findings are communicated.

2. The Joint Committee of Public Accounts and Audit (JCPAA) has encouraged the ANAO to consider ways in which the ANAO could capture and describe some of these impacts. The ANAO's Corporate Plan states that the ANAO's annual performance statements will provide a narrative that will consider, amongst other matters, analysis of key improvements made by entities during a performance audit process based on information included in tabled performance audit reports.

3. Performance audits involve close engagement between the ANAO and the audited entity as well as other stakeholders involved in the program or activity being audited. Throughout the audit engagement, the ANAO outlines to the entity the preliminary audit findings, conclusions and potential audit recommendations. This ensures that final recommendations are appropriately targeted and encourages entities to take early remedial action on any identified matters during the course of an audit. Remedial actions entities may take during the audit include:

- strengthening governance arrangements;
- introducing or revising policies, strategies, guidelines or administrative processes; and
- initiating reviews or investigations.

4. In this context, the below actions were observed by the ANAO during the course of the audit. It is not clear whether these actions and/or the timing of these actions were planned in response to proposed or actual audit activity. The ANAO has not sought to obtain assurance over the source of these actions or whether they have been appropriately implemented.

- Finance issued guidance for entities undertaking campaign advertising that included:
 - a definition of 'paid media placement' (see paragraph 2.24);
 - clarification that certification requirements apply to advertising and non-advertising activities undertaken during an advertising campaign (see paragraphs 2.28 and 2.29); and
 - guidance on the use of social media influencers in Australian Government campaigns (see paragraph 2.51).
- During the course of the audit, the ANAO did not observe changes in AGD's or the AEC's approach to government advertising.
- Health sent the campaign certification letter to the Minister for Health and Aged Care shortly after a related request for evidence was issued by the ANAO (see paragraph 5.17).

Appendix 3 Government Communications Campaign Panel suppliers

1. Table A.1 outlines the Government Communications Campaign Panel suppliers by village.

Table A.1: Government Communications Campaign Panel suppliers

Media requirements	Security	Economy	Health & wellbeing	Program delivery	Building our community	Infrastructure & innovation
Research	Kantar Public	Whereto Research	Fifty-five Five	IPSOS Public Affairs	ORIMA Research	
Creative	BMF	Clemenger BBDO	Ogilvy Australia	The Monkeys	TBWA Melbourne	
Public relations	Cox Inall Change	Think HQ	Fenton Communications	Horizon	ThinkHQ	
Aboriginal and Torres Strait Islander communications	Carbon Creative	33 Creative	Carbon Creative	Cox Inall Ridgeway	33 Creative	
Multicultural communications	Cultural Perspectives	CultureVerse	Cultural Perspectives	Embrace Society	CultureVerse	

Source: Department of Finance documentation.

Appendix 4 Comparison of Australian Government’s campaign advertising framework requirements and AEC’s requirements

1. Table A.2 outlines a comparison of the Australian Government’s campaign advertising framework (the framework) requirements and the AEC’s requirements.

Table A.2: Comparison of the framework requirements and AEC’s requirements

Campaign step	Framework requirements	AEC’s requirements
Campaign initiation	Minister for Finance authority required for campaigns with a budget of \$250,000 or higher (exclusive of GST)	No documented requirement
Assignment of campaign village	Minister for Finance	Not required, AEC is exempt from using the Government Communications Campaign Panel and developing campaigns under the village model
Compliance with the <i>Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities</i> (2022 Guidelines)	Mandatory, except where an exemption has been granted (mandatory to comply with the five Principles)	Compliance with the ‘broad intent’ of the 2022 Guidelines (mandatory to comply with the five Principles)
External third-party review	Review undertaken by the Independent Communications Committee	No documented requirement
Approval to launch the campaign	Government (Government Communications Subcommittee Stage 2)	No documented requirement
Campaign certification	Accountable authority	Accountable authority (Electoral Commissioner)
Reporting of evaluation findings	Government (Government Communications Subcommittee Stage 3)	To the Electoral Commissioner

Source: Department of Finance and AEC documentation.

Appendix 5 Your Answer Matters campaign objectives and evaluation outcomes

1. Table A.3 lists the 23 objectives of the AEC’s Your Answer Matters campaign and the outcome for each objective as reported in the final evaluation report. Of the 23 objectives, 16 were assessed as having been ‘met’, six were assessed as ‘partly met’ and one was assessed as ‘not met’.

Table A.3: Your Answer Matters campaign objectives and final evaluation report outcomes

Objective	Evaluation outcome
Education phase	
Raise awareness and knowledge about referendums	Met
Raise awareness that it is compulsory to vote in a referendum	Met
Increase belief participating in the referendum is important and worthwhile	Not met ^a
Increase belief that electoral participation is a social norm	Partially met
Encourage voters to visit the AEC website to learn more	Partially met
Close of Rolls phase	
Awareness and understanding that enrolment is compulsory	Met
Awareness and understanding that if you’re already enrolled for elections, you’re enrolled to vote in referendums too	Met
Awareness and understanding that you need to enrol or update by the deadline	Met
Awareness and understanding that if you’ve moved or changed your name, you need to update your details	Met
Increase intent to enrol or update enrolment before the deadline	Partially met
Encourage online enrolment (while offering alternative methods)	Met
Voter Services phase	
Increase understanding of the range of voting options, including voting day, the early voting period, and deadline for applying for a postal vote	Met
Increase awareness of the need to be eligible to take up early voting options	Partially met
Reinforce the belief that participating in a referendum is simple and convenient	Met
Encourage turnout — intent to vote in the referendum (before or on voting day)	Partially met
Eligible voters unable to attend on voting day still participate by voting early via available methods	Met
Formality phase	
Raise awareness and understanding of how to vote correctly on a referendum ballot paper (e.g., the need to write ‘yes’ or ‘no’ in the box to answer the question)	Met
Increase intent to cast a formal vote (to deter intentional informal voting)	Partially met
Ballot papers are completed correctly to be included in the count	Met

Objective	Evaluation outcome
Voters access information about how to vote correctly	Met
Disinformation phase	
Raise awareness of the potential disinformation about the voting process circulating during the referendum period	Met
Increase intent among voters to consider the source of what they see, hear or read	Met
Voters visit the AEC website to learn more and get tips on checking the source of information	Met

Note a: The proportion of survey respondents agreeing that 'It is important to vote in the referendum' remained at or below the benchmark level of 89 per cent. Those agreeing that 'My vote is going to make a difference' fell from the benchmark of 66 per cent to 56 per cent by the end of the campaign.

Source: AEC documentation.

Appendix 6 Your Answer Matters target audiences

1. Table A.4 lists the target audience groups for each campaign phase.

Table A.4: Audience groups by campaign phase

Education	Disinformation	Close of Rolls	Voter Services	Formality
<p>All eligible voters which includes:</p> <ul style="list-style-type: none"> • P17+^a • Overseas Australians • CALD audiences^b • First Nations Australians^c • People with a disability including blind/low vision 	<p>All eligible voters which includes:</p> <ul style="list-style-type: none"> • P17+^a • Overseas Australians • CALD audiences^b • First Nations Australians^c 	<p>All eligible voters and priority audiences with lower enrolment rates will be targeted which includes:</p> <ul style="list-style-type: none"> • P17–24^a • P25+^a • Overseas Australians • CALD audiences^b • First Nations Australians^c • Australians who have recently moved • P18+^a in postcodes with low enrolment • People with a disability including blind/low vision 	<p>All eligible voters and priority audiences to ensure all voting options reach those who need to know including:</p> <ul style="list-style-type: none"> • P18–24^a • P25+^a • Overseas Australians • CALD audiences^b • First Nations Australians^c • People in remote areas • People with a disability including blind/low vision 	<p>All eligible voters and priority audiences to ensure all voters know how to vote correctly:</p> <ul style="list-style-type: none"> • P18–24^a • P25+^a • Overseas Australians • CALD audiences^b • First Nations Australians^c • People with a disability including blind/low vision

Note a: Different phases of the campaign targeted people of various ages. ‘P’ refers to ‘people’, the numbers refer to their age.

Note b: ‘CALD audiences’ refers to people from culturally and linguistically diverse communities.

Note c: ‘First Nations Australians’ refers to Aboriginal and Torres Strait Islander peoples.

Source: AEC documentation.