

The Auditor-General  
Auditor-General Report No.24 2019–20  
Performance Audit

# **Defence's Management of its Public Communications and Media Activities**

Department of Defence

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Canberra ACT  
28 January 2020

Dear Mr President  
Dear Mr Speaker

In accordance with the authority contained in the *Auditor-General Act 1997*, I have undertaken an independent performance audit in the Department of Defence titled *Defence's Management of its Public Communications and Media Activities*. 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 that reads 'Grant Hehir'.

Grant Hehir  
Auditor-General

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

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# Contents

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|   |           |
|---|-----------|
| Summary and recommendations.....  | 7         |
| Background .....  | 7         |
| Conclusion .....  | 8         |
| Supporting findings.....  | 9         |
| Recommendations.....  | 10        |
| Summary of the Department of Defence response.....  | 11        |
| Key messages from this audit for all Australian Government entities.....  | 11        |
| <b>Audit findings.....</b>  | <b>13</b> |
| 1. Background .....   | 14        |
| Introduction.....   | 14        |
| Defence’s communications and media arrangements .....   | 15        |
| 2. Objectives and reporting.....  | 22        |
| Has Defence documented the objectives, outcomes and strategy for its media and public communications activities?.....   | 22        |
| Are there effective reporting mechanisms in place to provide assurance to Defence senior leaders that public communications and media activities deliver meaningful results against objectives and expected outcomes? .....           | 26        |
| 3. Management of planned activities.....  | 30        |
| Has Defence developed fit-for-purpose guidance and plans for planned media and communications activities, which address budget issues and how the outcomes of planned activities will contribute to the delivery of objectives? ..... | 30        |
| Does Defence monitor the delivery of its public communications and media activities against planned outcomes and budgets? .....   | 39        |
| 4. Management of routine activities.....  | 42        |
| Has Defence established guidance and processes for the effective management of its routine public communications and media activities? .....  | 42        |
| Does Defence monitor and report on the delivery of routine activities?.....   | 54        |
| <b>Appendices .....</b>   | <b>59</b> |
| Appendix 1     Department of Defence response .....   | 60        |
| Appendix 2     Australian Government legislation and frameworks governing public service information activities .....   | 62        |
| Appendix 3     Excerpts from stakeholder submissions to the ANAO .....  | 66        |



# Audit snapshot

## Auditor-General Report No.24 2019–20

### *Defence's Management of its Public Communications and Media Activities*



#### Why did we do this audit?

- ▶ Defence uses public resources to maintain an internal capability to manage its public communications and media activities.
- ▶ Defence's public communications and media activities are intended to help promote and support the policy agenda of the government of the day, its ministers and the Parliament.
- ▶ To provide assurance to Parliament that Defence has in place effective and appropriate arrangements to manage its public communications and media activities.



#### What did we find?

- ▶ Defence's arrangements for the appropriate management of its public communications and media activities remain in transition and are not fully effective.
- ▶ While Defence has largely established a policy and management framework for its public communications and media activities, it has not clearly articulated its overarching objectives or expected outcomes for those activities.



#### Key facts

- ▶ Public communications activities are diverse and can include advertising and information campaigns, non-campaign advertising, as well as other media, information and marketing activities.
- ▶ Accountable authorities have discretion in managing and resourcing these activities.
- ▶ Defence undertakes both planned and routine public communication and media activities and has established a capability to do so.
- ▶ In December 2016, Defence developed the Defence Communication Manual as the policy framework to guide its public communications and media activities. The manual was replaced with the Media and Communication Policy in July 2019.



#### What did we recommend?

- ▶ The Auditor-General made two recommendations to the Department of Defence. They relate to Defence:
  - clearly documenting the objective(s), expected outcomes and related performance measures for its public communications and media activities, and assessing risks to achieving the objective(s); and
  - clarifying expectations regarding evaluation activity and introducing arrangements to provide assurance that evaluations are completed as expected and in a timely manner.

# Summary and recommendations

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## Background

1. Public communication activities within the Commonwealth government sector are diverse and include advertising campaigns<sup>1</sup>, information campaigns<sup>2</sup>, non-campaign advertising<sup>3</sup>, and a variety of other media, information and marketing activities. These include the provision of support for ministerial communication activities, media liaison, public relations, social media activity and official publications. Accountable authorities have wide discretion in managing and resourcing such activities<sup>4</sup> and many entities have established specific internal capability for this purpose.
2. The Ministerial and Executive Coordination and Communication (MECC) Division, which is located within the Department of Defence's (Defence) Associate Secretary's Group, provides whole-of-department media and communications services, as well as coordination of parliamentary and Cabinet processes. The Division's Media and Communications Branch (MCB) provides a range of communication support and media services for Defence, including:
  - planned activities such as corporate events, Australian Defence Force exercises and general events; and
  - business-as-usual (routine) activities such as responding to media enquiries and issuing media releases, producing newspapers and magazines published by Defence, managing internet and departmental social media sites, writing speeches, and providing interviews or imagery to news and entertainment media.
3. In December 2016, Defence developed the Defence Communication Manual as the policy framework to guide its public communications and media activities. The manual was replaced

- 
- 1 The Department of Finance's 2014 *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (Finance guidelines) state that an advertising campaign involves paid media placement and is designed to inform, educate, motivate or change behaviour. Large-scale recruitment advertising not related to specific job vacancies and with a degree of creative content may also be considered an advertising campaign (paragraph 9). The campaign advertising framework was examined most recently in Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*.
  - 2 The Finance guidelines state that in general terms, a campaign is a planned series of communication activities that share common objectives, target the same audience and have specific timelines and a dedicated budget. An advertising campaign includes paid media placement and an information campaign does not (paragraph 7).
  - 3 The Finance guidelines state that simple informative advertising that generally appears only once or twice, contains factual statements and typically has a low creative content is not an advertising campaign. This category of advertising is non-campaign advertising and includes, but is not limited to: recruitment for specific job vacancies; auction and tender notices; invitations to make submissions or apply for grants; notification of date and/or location specific information (for example, notification of a public meeting at a particular time and place); and other public notices (paragraph 10).
  - 4 The Finance guidelines set out the principles applying to information and advertising campaigns undertaken in Australia. Non-corporate Commonwealth entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) must comply with the guidelines. Other than internal entity guidance, the primary regulatory framework for activities which are not subject to the Finance guidelines is the requirement for 'proper use' of Commonwealth resources under the PGPA Act. Employees subject to the *Public Service Act 1999* must also comply with the Australian Public Service (APS) Values in section 10 of the Act, which include obligations of impartiality and apolitical behaviour. See Appendix 2 for legislation and policies relating to public service information activities.

with the Media and Communication Policy in July 2019, which ‘provides a framework that helps Defence promote and support the policy agenda of the Government of the day, its ministers and the department’.<sup>5</sup>

4. In 2018–19, MECC’s budget was around \$18.06 million and included an average staffing level of 140.<sup>6</sup>

### **Rationale for undertaking the audit**

5. Defence uses public resources to maintain an internal capability to manage public communications and media activities, in the context of a policy framework intended to help Defence promote and support the policy agenda of the Australian Government, Defence ministers and the department. The rationale for undertaking this audit was to provide assurance to the Parliament that Defence has in place effective and appropriate arrangements to manage its public communications and media activities.

### **Audit objective and criteria**

6. The objective of the audit was to examine the effectiveness and appropriateness of the Department of Defence’s management of its public communications and media activities.

7. To form a conclusion against the audit objective, the ANAO adopted the following high level criteria:

- Defence has established clear objectives and guidance for its public communications and media activities.
- Defence has established governance arrangements that provide assurance that all public communications and media activities are approved and appropriate.
- Defence has implemented fit-for-purpose arrangements for monitoring and reporting on its public communications and media activities including against planned outcomes, budget and policy settings.

### **Conclusion**

8. Defence’s arrangements for the appropriate management of its public communications and media activities remain in transition and are not fully effective. While Defence has largely established a policy and management framework for these activities, it has not clearly articulated its overarching objectives or expected outcomes for undertaking them and internal reporting is primarily focused on outputs.

9. Defence developed a manual and introduced a successor policy in mid-2019 to provide guidance for the management of its planned and routine public communications and media activities. The manual and policy do not clearly document the overarching objectives or expected outcomes of those activities, or establish related performance measures, as a basis for assessing effectiveness. While the responsible division (MECC) routinely reports to Defence senior leaders

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5 Department of Defence, *Media and Communication Policy*, July 2019, p. 1.

6 This includes an average APS staffing level of 129.6 and an Australian Defence Force average funded strength of 10.4. See Table 1.3 for further detail.



on communications and media activities, these reports focus primarily on output measures such as the timeliness of responses to media enquiries. Reporting does not inform senior leaders or provide assurance on whether the department's public communication and media effort delivers meaningful results or whether resources are being allocated appropriately.

10. Defence has developed guidance and templates for its planned media and communications activities which are largely fit-for-purpose. However, there is inconsistent application of guidance and requirements, including clearances, development of communication plans, and evaluation activity.

11. Defence has also established policies and processes to guide the delivery of its routine public communications and media activities, including the management of media enquiries. Defence has identified concerns relating to its responsiveness to media enquiries and has introduced arrangements to prioritise its efforts and improve timeliness.

12. In the absence of a clearly documented overarching objective for Defence's media and public communications activities, reporting on the delivery of routine activities is primarily focused on output measures such as the number of media enquiries and the time taken to respond.

## Supporting findings

### Objectives and reporting

13. Defence has not explicitly documented the objectives of its Media and Communication Policy introduced in July 2019, or the expected outcomes of its media and public communications activities. Defence released an Interim Communication and Engagement Strategy for 2019–20 in August 2019, which remains to be finalised.

14. MECC provides regular reports to Defence senior leaders on output measures, such as the timeliness of responses to media enquiries and activities, as well as providing updates on sensitive issues. Reports do not provide information on the achievement of outcomes or reasons why activities have not been completed consistent with timeliness targets. The absence of clearly documented objective(s), expected outcomes and related performance measures limits the assurance provided to senior leaders, through internal reporting, that Defence's public communications and media activities are delivering meaningful results.

### Management of planned activities

15. The Defence Communication Manual, in place until mid-2019, included guidance and a recommended template for the development of communication plans for planned activities, although it did not specify which planned activities required communication plans. Defence issued a Media and Communication Policy in July 2019, with clearer expectations around which activities should have communication plans developed, although there are no arrangements in place to ensure that all activities that require a communication plan have one. The template provided to staff to guide their development of communication plans, under the manual and the policy, includes fields for budget and evaluating outcomes. Neither the policy nor other guidance prescribes usage of the template, and there is variability in the types of information included in Defence communication plans.

16. Of the 197 communication plans located by Defence for ANAO review, only 40 per cent (79 plans) were cleared at the level of seniority required by the manual. While the plans mostly set out the activities to be undertaken — including key messages, communication objectives, target audiences and stakeholders — only 23 per cent of plans included budget information and 49 per cent included criteria for evaluating the outcomes of the activity. Risks and sensitivities were considered in 68 per cent of communication plans.

17. Defence cannot monitor the delivery or effectiveness of all its public communications and media activities against planned outcomes and budgets, because it does not always include evaluation criteria in its communication plans or routinely undertake evaluation activity.

18. Less than half of the communication plans reviewed by the ANAO included evaluation criteria to measure performance and delivery against expected outcomes, and only 12 per cent of the planned activities reviewed by the ANAO had been evaluated. There is a lack of clarity around evaluation requirements in Defence's Media and Communication Policy.

### **Management of routine activities**

19. Defence has established policies and processes to guide the delivery of its routine activities, including a policy framework under which public communication and media activities are undertaken, and a process for the timely and appropriate clearance of media enquiries. Following the release of its new Media and Communication Policy in July 2019, and in response to stakeholder concerns, Defence has introduced a 'triage' arrangement to prioritise its efforts and improve timeliness. Defence records indicate that mandated processes for engaging with external media and registering media contacts have not been consistently applied, and in these cases Defence could not be certain that the release of information had been approved.

20. While there are clear expectations regarding impartiality and non-partisanship in APS and ADF dealings with the public and the media, there is scope for Defence to provide more specific guidance to its personnel on protocols for preserving public confidence and perceptions of impartiality in circumstances where Defence personnel make public appearances with ministers and overtly political issues arise.

21. Defence's internal reporting on the delivery of routine media and communications activities is primarily focused on output measures relating to the number of media enquiries and the time taken to respond, rather than the achievement of overarching objectives. Defence has one performance measure relating to the timeliness of responses to media enquiries.

## **Recommendations**

**Recommendation no.1** Defence clearly document the objective(s), expected outcomes and related performance measures for its public communications and media policy and activities, and assess risks to the achievement of the documented objective(s).

**Paragraph 2.12**

**Department of Defence response:** *Agree.*

**Recommendation no.2** Defence clarify its expectations for the evaluation of planned activities and introduce arrangements to provide assurance that evaluations are completed as expected and in a timely manner.  
**Paragraph 3.35**

**Department of Defence response:** *Agree.*

## Summary of the Department of Defence response

22. Defence's summary response is provided below. The department's full response can be found at Appendix 1.

Defence welcomes the findings contained in the audit report on *Defence's Management of its Public Communications and Media Activities* and agrees with the recommendations.

Defence has undertaken significant reform of its media and communication function, with the majority of this change implemented during 2018-19. This has delivered a shared services arrangement that better supports the Department and our Ministers. Embedding a reform program of this size requires time, however Defence has already seen improvements in the efficiency and effectiveness of its communication processes, which is expected to continue during the next six months as processes are further implemented and refined.

Defence introduced a Media and Communication Policy in July 2019, which replaced the Defence Communication Manual 2016. The policy provides a governance framework for communication and procedural guidance to support Defence's public communications and engagement with the media, including approval processes for the release of public information. Defence will update its Media and Communication Policy to define the activities that require communication plans and clearly articulate the requirement for formal evaluation of communication plans.

There will always be room to improve. Defence is confident it is on track to continually enhance its media and communication services to provide a coordinated and consistent voice to Government, the media, Defence industry, members of the public and employees, and manage risk and accountability.

## Key messages from this audit for all Australian Government entities

23. 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.

### Policy/program design

- Effective delivery of an activity requires a clear understanding of what is to be achieved (objectives), the impact of the activity (outcomes) and how success of the activity will be measured.

### Performance and impact measurement

- Clear articulation of program objectives provides a basis to evaluate the extent to which outcomes are being delivered. This is particularly important for discretionary activities, so as to provide assurance regarding the proper use of public resources.

### Governance

- Policies and processes should clearly articulate the behaviour entities expect from their staff when engaging with the media and members of Parliament.



## **Audit findings**

# 1. Background

## Introduction

1.1 Public communication activities within the Commonwealth government sector are diverse and include advertising campaigns<sup>7</sup>, information campaigns<sup>8</sup>, non-campaign advertising<sup>9</sup>, and a variety of other media, information and marketing activities. These include the provision of support for ministerial communication activities, media liaison, public relations, social media activity and official publications. Accountable authorities have wide discretion in managing and resourcing such activities<sup>10</sup> and many entities have established specific internal capability for this purpose.

1.2 Table 1.1 indicates the percentage of Australian Public Service (APS) staff identified as working in communications and marketing roles by medium to large entities as at December 2018, in data they have supplied to the Australian Public Service Commission.

**Table 1.1: APS staff in communications and marketing roles<sup>a</sup>**

| Entity                       | Staff in communications and marketing roles as at December 2018 <sup>b</sup> | Total staff numbers as at April 2019 <sup>c</sup> (percentage in communications and marketing roles) |
|------------------------------|--|--|
| Department of Human Services | 286  | 27,534<br>(1.04%)  |
| Australian Taxation Office   | 493  | 17,416<br>(2.83%)  |

7 The Department of Finance's 2014 *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (Finance guidelines) state that an advertising campaign involves paid media placement and is designed to inform, educate, motivate or change behaviour. Large-scale recruitment advertising not related to specific job vacancies and with a degree of creative content may also be considered an advertising campaign (paragraph 9). The campaign advertising framework was examined most recently in Auditor-General Report No.7 2019–20, *Government Advertising: June 2015 to April 2019*.

8 The Finance guidelines state that in general terms, a campaign is a planned series of communication activities that share common objectives, target the same audience and have specific timelines and a dedicated budget. An advertising campaign includes paid media placement and an information campaign does not (paragraph 7).

9 The Finance guidelines state that simple informative advertising that generally appears only once or twice, contains factual statements and typically has a low creative content is not an advertising campaign. This category of advertising is non-campaign advertising and includes, but is not limited to: recruitment for specific job vacancies; auction and tender notices; invitations to make submissions or apply for grants; notification of date and/or location specific information (for example, notification of a public meeting at a particular time and place); and other public notices (paragraph 10).

10 The Finance guidelines set out the principles applying to information and advertising campaigns undertaken in Australia. Non-corporate Commonwealth entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) must comply with the guidelines. Other than internal entity guidance, the primary regulatory framework for activities which are not subject to the Finance guidelines is the requirement for 'proper use' of Commonwealth resources under the PGPA Act. Employees subject to the *Public Service Act 1999* must also comply with the Australian Public Service (APS) Values in section 10 of the Act, which include obligations of impartiality and apolitical behaviour. See Appendix 2 for legislation and policies relating to public service information activities.

| Entity  | Staff in communications and marketing roles as at December 2018 <sup>b</sup> | Total staff numbers as at April 2019 <sup>c</sup> (percentage in communications and marketing roles) |
|---|--|--|
| Department of Home Affairs                    | 214  | 14,120<br>(1.51%)  |
| Department of Defence <sup>d</sup>            | 168  | 16,010<br>(1.05%)  |
| Department of Foreign Affairs and Trade       | 79   | 5,613<br>(1.41%)   |
| Department of Agriculture and Water Resources | 60   | 4,657<br>(1.29%)   |
| Department of Health                          | 100  | 4,058<br>(2.46%)   |
| National Disability Insurance Agency          | 152  | 3,138<br>(4.84%)   |
| Department of Social Services                 | 60   | 2,085<br>(2.88%)   |
| Department of the Environment and Energy      | 80   | 1,995<br>(4.01%)   |

Note a: This table includes entities that had over 10,000 staff as at April 2019, or over 50 staff identified as working in communications and marketing roles, in data supplied by entities to the Australian Public Service Commission as at December 2018.

Note b: The Australian Public Service Commission communications and marketing job family includes: marketing; creative design; public relations and stakeholder management; writing and editing; and multimedia.

Note c: Staffing numbers are based on the 2018–19 average staffing level estimated actuals from the 2019–20 Portfolio Budget Statements.

Note d: Data in this table relates to APS staff only, and excludes Navy, Army and Air Force personnel.

Source: Portfolio Budget Statements and Australian Public Service Commission data.

1.3 Table 1.1 indicates that the Department of Defence (Defence) has reported that as at December 2018, 168 of its APS employees, or 1.05 per cent of all Defence APS employees, are part of the ‘communications and marketing’ job family, which includes: marketing; creative design; public relations and stakeholder management; writing and editing; and multimedia tasks. This reporting does not include Navy, Army and Air Force personnel assigned to such tasks.<sup>11</sup>

## Defence’s communications and media arrangements

### Defence’s media and public communications framework

1.4 The Defence Communication Manual (the manual) was released in December 2016 and set out the internal policy framework, as well as procedural guidance. It was ‘aimed at informing and

<sup>11</sup> Table 1.3 contains information on the number of Australian Defence Force (ADF) personnel working in media and communications roles in Defence.

assisting Defence personnel engage in communication and public affairs activities in, and on behalf of, Defence.’ The manual stated that:

... Internal and external public awareness and understanding of Defence policies, its mission and its activities are vital to maintain public support for the organisation and its activities.

... The communication and public affairs function plays a critical role in assisting Defence leaders, managers and commanders to promote Defence as a capable, transparent and accountable organisation and for delivering a consistent internal message.<sup>12</sup>

1.5 Defence commenced work on replacing the manual in 2018, following feedback that it was too long, contained too much guidance information, and was not enforceable.

1.6 Defence released a Media and Communication Policy (the policy) to staff on 15 July 2019. The policy sets out how the department will engage with the media and governs all media and public affairs activities. The policy states that it:

... provides a framework that helps Defence promote and support the policy agenda of the Government of the day, its Ministers and the Department. It enables appropriate, quality engagement with the media and the public and seeks to shape the narrative of Defence.

... Through successful management of public affairs, we effectively promote the Department — including the Services — and, in doing so, ensure our Defence community (personnel, families, veterans etc.) understand what we are doing, and why.

... Defence has an obligation to support the Government and assist in implementing Government policy by responsibly and proactively communicating information about its activities and capabilities to its stakeholders and the public. This is achieved through media and communications activities undertaken in an impartial, transparent and professional manner.<sup>13</sup>

1.7 The manual contained both policy and procedural guidance, while the new policy separates out procedural guidance, with the creation of a separate Communications Toolkit, intended to provide detailed guidance and procedures to support staff undertaking media and communications activities. Use of the toolkit is not prescribed in the policy. Defence advised the ANAO that the toolkit is intended to be an iterative resource that is updated regularly by staff.<sup>14</sup>

1.8 As the manual was in force for the period of audit fieldwork, it has been used as the basis for analysis in this report. The report also considers how processes have changed due to the introduction of the policy. The manual and the policy are discussed further in Chapter 2.

## **Organisational arrangements for public communications and media**

1.9 Defence reviewed its media and communications function four times between 1999 and 2014.<sup>15</sup> These reviews identified a variety of shortcomings with Defence’s delivery model, including

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12 Department of Defence, *Defence Communication Manual*, December 2016, p. 5.

13 Department of Defence, *Media and Communication Policy*, 15 July 2019, pp. 6–7.

14 As at 5 September 2019, the Toolkit contained guidance on media enquiries, Defence branding and internal communication channels. Guidance is still being developed on Defence writing and digital and social media. It also includes a range of templates, including templates for communication plans and media releases.

15 These reviews were: Buchan (1999), Wilson (2005), Crane (2012), and the Secretary and Chief of the Defence Force Service Delivery Reform Program (2014).



the absence of a corporate communications strategy and a decentralised media and communications function. Defence's *First Principles Review: Creating One Defence*, released in 2015, recommended that corporate services, including media and communications functions, be consolidated under the Associate Secretary through a shared services arrangement.<sup>16</sup> The shared services arrangement involves the provision of standardised services for media, communications, and ministerial and parliamentary activities across Defence.

1.10 Defence commenced an organisational reform of its Ministerial and Executive Coordination and Communication (MECC) Division in 2018. The new model gave accountability for delivering Defence media and communications services to the Associate Secretary. Key functions such as the management of media enquiries and support to ministers and Parliament remained within MECC Division. Communication roles within the departmental groups and the three Australian Defence Force (ADF) Services became MECC Division embedded positions.<sup>17</sup> People in those positions continued to provide communications advice and support to Defence groups and the Services, with an additional reporting line through to MECC Division.

1.11 MECC Division now provides whole-of-department media and communication services, and coordinates parliamentary and Cabinet processes within Defence. Within MECC, the Media and Communications Branch (MCB) provides a range of communication support and media services to the Defence organisation, including for:

- planned activities — such as corporate events, ADF exercises or general events (an example is air shows)<sup>18</sup>; and
- business as usual (routine) activities — such as responding to media enquiries and issuing media releases, producing newspapers and magazines published by Defence, managing internet and departmental social media sites, writing speeches, and providing interviews or imagery to news and entertainment media.<sup>19</sup>

1.12 The organisation structure of MECC Division is shown at Figure 1.1.

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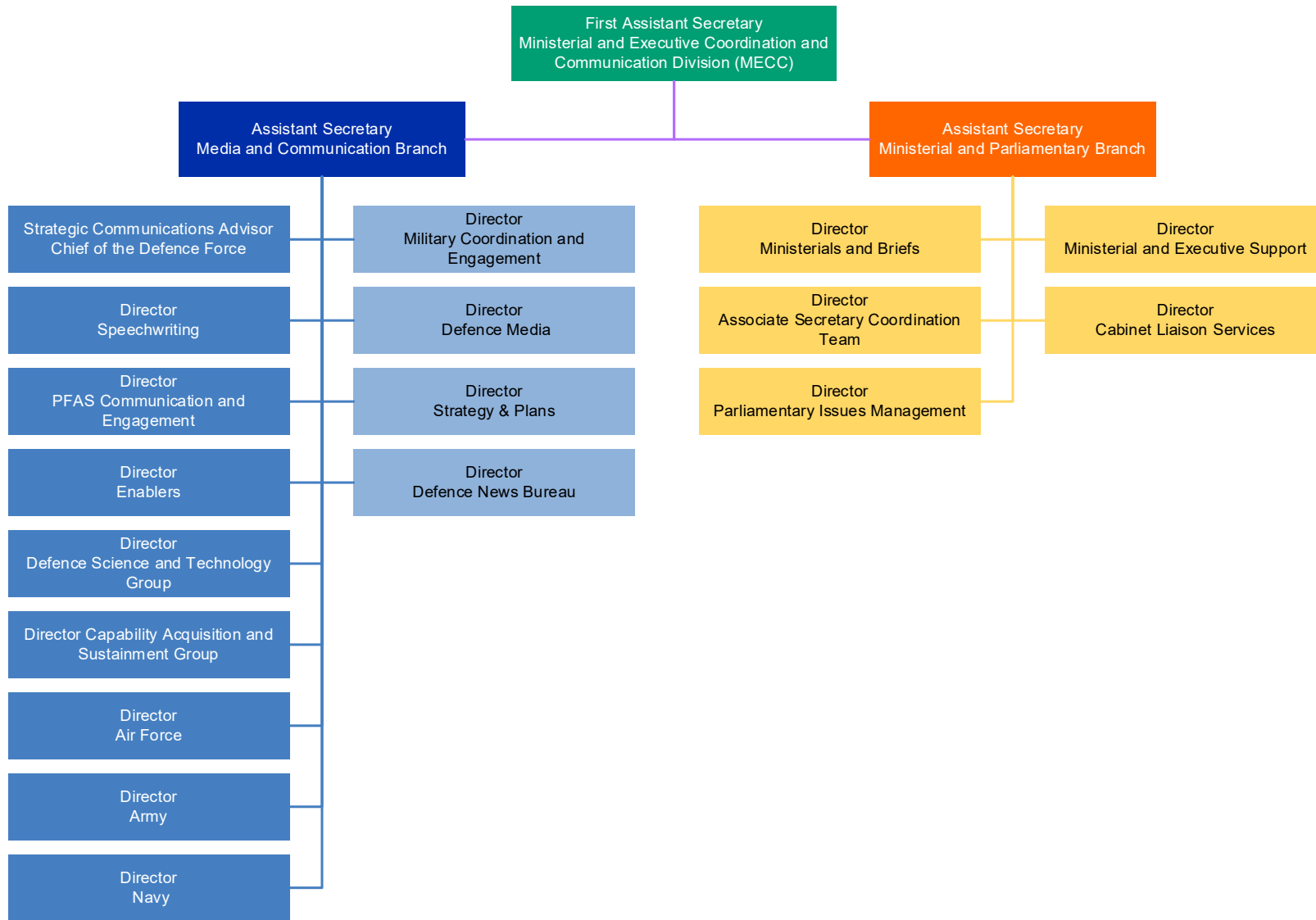
16 The First Principles Review was undertaken with the goal of ensuring that Defence is 'fit for purpose and is able to deliver against its strategy with the minimum resources necessary'. The review included 76 recommendations. See Auditor-General Report No. 34 2017–18, *Defence's Implementation of the First Principles Review*.

17 Prior to the reform, relevant positions were 'owned' by individual Defence groups and the Services.

18 Planned media and public communication activities are examined in Chapter 3 of this audit report.

19 Business as usual activities are examined in Chapter 4 of this audit report. Defence defines public comment as the provision of information as text, audio or imagery to individuals or organisations outside the department.

**Figure 1.1 MECC Division organisation structure**



Source: Department of Defence documentation.

1.13 MECC developed a service offer in 2016 to explain the services it provided, how they could be accessed, and the service standards customers could expect.<sup>20</sup> The offered services included:

- media liaison, such as coordination of media inquiries, coordination of Office of the Secretary and Office of the Chief of the Defence Force clearances for responses to the media, and distribution of media releases and alerts;
- corporate communication services and support to Defence groups and Services, such as provision of communication and public affairs advice, and the provision of media training;
- Defence news and multimedia services, such as provision or facilitation of video, imagery and articles for official Defence products, and publication of Service newspapers and the Defence Magazine; and
- strategic issues management, such as maintaining a ‘single source of truth’ on strategic, sensitive and emerging matters, and coordinating and managing advice on complex and sensitive issues.<sup>21</sup>

1.14 MECC updated the service offer in July 2019 to reflect its new shared services model. The update was developed through consultation with Defence groups and services in late-2018 to mid-2019. Defence advised that further review will take place during 2019 to cover the first year of the new organisational structure. The updated offer includes the additional services of: management of social media; responsibility for corporate Defence branding; speechwriting and talking point services; entertainment media management; and communication strategy and planning services.

1.15 Table 1.2 includes examples of the type and number of communications and media activities undertaken by MECC Division in the period January 2017 to September 2019.

**Table 1.2: Public communications and media activities undertaken by MECC**

| Activity   | 2017             | 2018  | 2019              |
|--|------------------|-------|-------------------|
| Departmental media releases                                  | 132              | 110   | 116 <sup>a</sup>  |
| Media enquiries responded to                                 | 957 <sup>b</sup> | 2,310 | 1161 <sup>c</sup> |
| Number of editions of the Defence Magazine published         | 4                | 2     | 0 <sup>d</sup>    |
| Number of editions of the three Service newspapers published | 23               | 23    | 18 <sup>e</sup>   |

Note a: As at 30 September 2019.

Note b: Defence advised that prior to March 2017, Defence media enquiries were managed through a different ICT system. Therefore data is only available from March 2017.

Note c: As at 27 September 2019.

Note d: Defence advised that publication of the Defence Magazine has been discontinued due to the creation of a Defence online news site in March 2019.

Note e: As at 30 September 2019.

Source: ANAO analysis of Department of Defence information.

20 Service standards relate to the timeliness and quality of products and responses.

21 The service offer also includes services related to Cabinet and ministerial liaison and parliamentary processes. These are not included in the scope of this audit.

1.16 Table 1.3 outlines the MECC’s budget and employee numbers from 2016–17 to 2018–19.

**Table 1.3: MECC Division budget and employees**

|  | 2016–17   | 2017–18   | 2018–19            |
|--|-----------|-----------|--------------------|
| APS Staffing Costs                       | \$9.296m  | \$11.624m | \$16.842m          |
| Average APS Staffing Levels Funded (ASL) | 79.8      | 89        | 129.6 <sup>a</sup> |
| Average Funded Strength <sup>b</sup>     | 10.1      | 9.2       | 10.4               |
| MECC budget <sup>c</sup>                 | \$14.134m | \$16.970m | \$18.057m          |
| MECC actual spend                        | \$12.525m | \$15.528m | \$21.446m          |

Note a: Defence advised that this increase was due to positions being reassigned to MECC as a part of the organisational reform discussed in paragraph 1.10.

Note b: Average number of Navy, Army and Air Force personnel paid on a full time equivalent basis during a financial year.

Note c: These figures do not include the costs associated with the conduct of planned activities.

Source: Department of Defence data.

### Rationale for undertaking the audit

1.17 Defence uses public resources to maintain an internal capability to manage public communications and media activities, in the context of a policy framework intended to help Defence promote and support the policy agenda of the Australian Government, Defence ministers and the department. The rationale for undertaking this audit was to provide assurance to the Parliament that Defence has in place effective and appropriate arrangements to manage its public communications and media activities.

### Audit approach

#### *Audit objective, criteria and scope*

1.18 The objective of the audit was to examine the effectiveness and appropriateness of the Department of Defence’s management of its public communications and media activities.

1.19 To form a conclusion against the audit objective, the ANAO adopted the following high level criteria:

- Defence has established clear objectives and guidance for its public communications and media activities.
- Defence has established governance arrangements that provide assurance that all public communications and media activities are approved and appropriate.
- Defence has implemented fit-for-purpose arrangements for monitoring and reporting on its public communications and media activities including against planned outcomes, budget and policy settings.

1.20 The audit focused on the media and communications services provided by MECC Division. The audit did not include: a review of Defence advertising, such as the ongoing ADF recruitment campaigns; the ministerial correspondence, briefing and Cabinet liaison activities managed by

MECC Division; or a review of Defence outreach activities such as publication of the Australian Military Sales Catalogue and the management of overseas trade shows.

### *Audit methodology*

1.21 The audit methodology included:

- reviewing relevant departmental policies, plans and process documentation;
- reviewing communication plans for compliance with requirements in the Defence Communication Manual (the policy and guidance in place when audit fieldwork took place); and
- discussions with MECC Division staff, including staff embedded in: Defence People Group, the Capability Acquisition and Sustainment Group, and Joint Command Group; the Navy, Army and Air Force; and in the Office of the Chief of the Defence Force. The ANAO also met with the Associate Secretary and the Vice Chief of the Defence Force in their capacity as the issuers of the manual and policy.

1.22 The ANAO also received written stakeholder submissions, briefings by the Defence and National Security Media Association and, in an individual capacity, briefings from persons associated with the Australian Strategic Policy Institute.

1.23 The audit was conducted in accordance with ANAO auditing standards at a cost to the ANAO of approximately \$413,099. Audit team members were: Tara Rutter, Kelly Williamson, Leo Simoens, and Sally Ramsey.

## 2. Objectives and reporting

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### Areas examined

This chapter examines the extent to which Defence has documented objectives, outcomes and a strategy for its public communications and media activities. The chapter also examines the arrangements in place to report to Defence senior leaders on the achievement of planned outcomes.

### Conclusion

Defence developed a manual and introduced a successor policy in mid-2019 to provide guidance for the management of its planned and routine public communications and media activities. The manual and policy do not clearly document the overarching objectives or expected outcomes of those activities, or establish related performance measures, as a basis for assessing effectiveness. While the responsible division (MECC) routinely reports to Defence senior leaders on communications and media activities, these reports focus primarily on output measures such as the timeliness of responses to media enquiries. Reporting does not inform senior leaders or provide assurance on whether the department's public communication and media effort delivers meaningful results or whether resources are being allocated appropriately.

### Area for improvement

The ANAO has made one recommendation aimed at Defence documenting the objective(s), expected outcomes and related performance measures for its public communications and media policy and activities, and assessing risks to the achievement of the documented objective(s).

2.1 The following criteria were used to assess whether Defence has established clear objectives for its public communications and media activities, and has fit-for-purpose arrangements for monitoring and reporting against planned outcomes:

- has Defence documented the objectives, outcomes and strategy for its media and public communications activities; and
- are there effective reporting mechanisms in place to provide assurance to Defence senior leaders that public communications and media activities deliver meaningful results against objectives and expected outcomes.

### Has Defence documented the objectives, outcomes and strategy for its media and public communications activities?

Defence has not explicitly documented the objectives of its Media and Communication Policy introduced in July 2019, or the expected outcomes of its media and public communications activities. Defence released an Interim Communication and Engagement Strategy for 2019–20 in August 2019, which remains to be finalised.

## Objectives

2.2 The July 2019 Media and Communication Policy (the policy) and the 2016 Defence Communication Manual (the manual) set out Defence's policy for officials undertaking public communication activities.<sup>22</sup> The July 2019 policy states that it:

... helps Defence promote and support the policy agenda of the Government of the day, its Ministers and the Department. It enables appropriate, quality engagement with the media and the public and seeks to shape the narrative of Defence.<sup>23</sup>

2.3 The manual, which was replaced by the policy in July 2019<sup>24</sup>, described the role of Defence communications and public affairs as follows:

- through traditional and digital media, provide information to Government and the Australian people on Defence activities to build on and improve Defence's public standing;
- respond and provide a consistent view of Defence to internal and external parties;
- provide consistent internal messaging and promoting specific priorities of Defence; and
- promote the Defence identity.<sup>25</sup>

2.4 The statements included in the policy (and before it, the manual) provide some insights into the practical purposes and context of Defence's public communications and media activities. However, the policy (and previous manual) is not explicit as to whether these statements also represent the overarching objectives for those activities. Clearly documenting whether or not these statements are intended to establish policy objectives would provide direction for users of the policy and a basis for assessing performance.

2.5 Articulating the outcomes which the policy is expected to deliver, against its objectives, would further strengthen Defence's ability to assess performance. It would enable Defence to assess whether the use of public resources for specific public communications and media activities is contributing to defined outcomes and overarching policy objectives.

### *Business Plans*

2.6 MECC Division's 2018–19 Business Plan described MECC as a central strategic coordination area, providing a whole of agency media and communications service through a shared service agreement and coordinating parliamentary business for the department. The plan stated that MECC has 'responsibility for ensuring that many of our external requirements are met in accordance with the law, parliamentary, ministerial and media requirements are met in a professional and timely manner'.<sup>26</sup> The plan discussed the following issues and planned actions:

- challenges relating to absorbing additional staff as a part of the [organisational] reform, while maintaining service quality, to be addressed by implementation of Defence

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22 The Defence Communication Manual was the policy and guidance in place during audit fieldwork. The ANAO has tested Defence's communication plan compliance with the requirements in the manual in Chapter 3.

23 Department of Defence, *Media and Communication Policy*, 15 July 2019, p. 6.

24 The change is discussed at paragraphs 1.4 to 1.6 of this audit report.

25 Department of Defence, *Defence Communication Manual*, December 2016, p. 5.

26 Department of Defence, *MECC — Business Plan 2018–19*, p. 1.

Committee agreed reforms and a ‘tiger’ team involving MECC staff and the Assistant Secretary;

- required cultural change in becoming ‘one Defence’ focussed, to be addressed through: implementation and monitoring of Defence Committee agreements; engagement of media and communications staff in town halls; and social media reform;
- incorporating the whole-of-government parliamentary workflow system into Defence information management arrangements, to be addressed by supporting the whole-of-government Parliamentary Document Management System implementation committee; and
- changes to the cabinet system, to be addressed by the MECC First Assistant Secretary being a member of the cabinet implementation board, and close engagement from Defence cabinet staff.

2.7 The 2019–20 Business Plan states that MECC’s work ‘contributes to making sure that the public know what Defence does, helps accountability and ensures our Ministers are properly supported to undertake their essential roles.’ The business plan identifies priorities which relate to:

- workforce development;
- improved timeliness and quality of media responses and parliamentary support;
- building a strategic engagement planning capability to support ministers and senior officials;
- implementing Enterprise Business Committee agreed business reforms;
- building new products that support ministers; and
- building a community of media and public affairs professionals across Defence, with common goals, purposes and systems.

2.8 MECC’s 2019–20 Business Plan also states that it aligns with the Defence corporate plan and the objectives of the Associate Secretary.<sup>27</sup> Defence intranet guidance on business planning provides minimum requirements for group and Service business plans, including that they must provide linkage of their programs/activities to the business direction described in the Defence corporate plan. The July 2019 Business Plan template includes a section on corporate plan activities, where division and branch plans are to demonstrate how their plan contributes to their Group or Service Plan, which should contribute to the corporate plan. Alignment with the corporate plan was not clearly articulated in the MECC’s 2018–19 or 2019–20 Business Plans.

### *Risk Management*

2.9 The June 2015 Defence Risk Management Joint Directive requires risk management to be integrated into all planning, approval, review and implementation processes, at all levels, to ensure that risk is one of the major considerations in decision-making. The Joint Directive also requires that risk assessments be conducted on all new activities and functions prior to commencement, and whenever there are significant changes to the way existing activities or functions are conducted.

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27 Defence advised the ANAO that while there are no documented directions from the Associate Secretary, the plan is based on continual interaction with the Associate Secretary.



2.10 MECC advised that it conforms to the Joint Directive, as well as contributing to the mitigation of the enterprise risks outlined in the Defence corporate plan. MECC has not provided any evidence of a documented link between Defence enterprise risks and the work undertaken by MECC. MECC Division does not have a risk management framework or plan. MECC advised that it is not required to have a risk mitigation plan as that requirement is only for Defence groups.

2.11 The 2018–19 MECC Business Plan identified three risks and set out mitigation strategies for each risk. The identified risks related to MECC reform rather than business-as-usual activities.<sup>28</sup> Notwithstanding the introduction of a new Media and Communications Policy in July 2019, risk is not discussed in the 2019–20 MECC Business Plan or in the Interim Communication and Engagement Strategy (discussed further in paragraphs 2.14–2.16).

### Recommendation no.1

2.12 Defence clearly document the objective(s), expected outcomes and related performance measures for its public communications and media policy and activities, and assess risks to the achievement of the documented objective(s).

**Department of Defence response:** *Agree.*

### Strategy

2.13 In August 2019, Defence published an Interim Communication and Engagement Strategy (the interim strategy) for 2019–20 on its intranet. Defence identified the need for a strategy in communications and public affairs during internal consultation processes held in 2015 and 2018 respectively.

2.14 The interim strategy states that ‘Defence needs effective and coherent communications that demonstrate how we are achieving the objectives and outcomes set by Government’, and that communication priorities will show:

- how Defence is responding to strategic change globally and in our region;
- [Defence’s] operational effectiveness;
- how [Defence’s] capability, force modernisation and industry policies and programs meet emerging strategic circumstances;
- how Defence is reforming to maintain a capability edge;
- Defence building and enhancing the ADF and APS; [and]
- the value of the brands and reputation of Defence, including the Services.<sup>29</sup>

28 Identified risks include groups/services ‘backsliding’ on reform, staff dissatisfaction with reform, and the stalling of reform due to competing pressures. Mitigations include keeping the executive informed, staff engagement, and staff set aside to complete reforms.

29 Department of Defence, *Interim communication and engagement strategy 2019–2020*, 2019, p. 3.

2.15 Defence advised the ANAO that the strategy will not include outcomes and performance indicators, and that the MECC Division's Service Offer is the framework for performance measurement.<sup>30</sup>

2.16 Defence further advised in October 2019, that it intends to finalise the interim strategy by December 2019.

### **Are there effective reporting mechanisms in place to provide assurance to Defence senior leaders that public communications and media activities deliver meaningful results against objectives and expected outcomes?**

MECC provides regular reports to Defence senior leaders on output measures, such as the timeliness of responses to media enquiries and activities, as well as providing updates on sensitive issues. Reports do not provide information on the achievement of outcomes or reasons why activities have not been completed consistent with timeliness targets.

The absence of clearly documented objective(s), expected outcomes and related performance measures limits the assurance provided to senior leaders, through internal reporting, that Defence's public communications and media activities are delivering meaningful results.

#### **Reporting to Defence senior leaders**

2.17 MECC reports to Defence senior leaders in a number of ways, including through:

- weekly reports to the Defence senior leadership group — the Secretary, Chief of the Defence Force, Associate Secretary, Vice Chief of the Defence Force, group heads and service chiefs. Table 2.1 (below) sets out the three types of weekly reports provided to Defence senior leaders as at 23 August 2019;
- updates regarding matters of strategic importance to the Enterprise Business Committee (EBC)<sup>31</sup>;
- updates to the Associate Secretary at Division Head Meetings;
- a weekly email to the Associate Secretary on key issues, which includes data on the number and timeliness of media inquiries;
- a communication and public affairs standing agenda item at the Chiefs of Staff of Defence senior leaders' 'sync' (synchronisation) meeting, held once a fortnight; and
- updates provided at the tri-weekly Chief of Defence Force and Secretary 'sync' meeting, and the weekly Strategic Command Group meeting, attended by an expanded group of senior Defence officers.

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30 See paragraphs 1.13–1.14 of this audit report for discussion on the Service Offer.

31 The Enterprise Business Committee comprises the Associate Secretary, the Vice Chief of the Defence Force, Deputy Secretaries, the Chief Financial Officer, the Chief of Navy, the Chief of Army, the Chief of Air Force, the Chief Information Officer, the Chief Defence Scientist, and the Chief of Joint Capabilities.

**Table 2.1: MECC Division weekly reporting to senior Defence leaders<sup>a</sup> as at 23 August 2019**

| Report                                  | Content  | Reporting commenced |
|---|--|---------------------|
| Timeliness report                       | Provides data on timeliness of Ministerial Correspondence, Ministerial Briefs, Questions on Notice, Media Enquiries, enquiries to the Office of the Minister for Defence, and Question Time Briefs. Since August 2019 the media timeliness report has been sent separately to the ministerial timeliness report, and has focussed on 'priority 1' requests. <sup>b</sup> | February 2018       |
| Defence activity and engagement tracker | Provides a register of current Defence engagement activities, such as community events and Defence exercises, and a summary of the associated communication activities.  | November 2018       |
| Cast report                             | Provides movements of senior personnel across a two week period.   | April 2019          |

Note a: Weekly reporting to Defence senior leaders from MECC also includes reports on the forward work program of relevant parliamentary committees, Cabinet priorities, and questions on notice. This reporting is not included in the scope of this audit. Not all reports were included in the weekly report every week.

Note b: In July 2019, Defence implemented a new triage matrix for prioritising media enquiries. Priority one enquiries are the highest priority and have a three hour timeframe for a response to be provided. This is described further in paragraph 4.12.

Source: ANAO analysis of Department of Defence reports.<sup>32</sup>

2.18 The ANAO reviewed weekly reports submitted to the Defence senior leadership group between 23 February 2018 and 23 August 2019. Over the 79 weeks in that period, 56 weekly report emails were obtained. For 20 weeks, reports were not issued, for example, due to ministerial changes and the 2019 federal election caretaker period, and three weekly report emails could not be located by Defence. Defence advised the ANAO in October 2019 that hardcopies of the weekly reports are distributed at every senior leadership group meeting.

2.19 Weekly reports were intended to be sent to all members of the Defence senior leadership group. Reports were not sent to the: Chief Defence Scientist (21 cases); Deputy Secretary, Capability and Sustainment Group (three cases); Chief of Navy (six cases) and Chief of Joint Capabilities (one case). Defence advised the ANAO in October 2019 that this was due to occasions where the group email list was out of date, and that hard copies of all reports were tabled at the meetings.

2.20 In the weekly reports MECC provided updates on the timeliness of activities, current media events and current media and communication activities. Thirty-eight of the 52 timeliness reports examined by the ANAO compared results to the previous week. The reports did not reference any targets (such as the targets set out in the Service Offer), so performance expectations and achievements against targets are not clear. The reports did not refer to outcomes or provide reasons why activities were late.

2.21 In May 2018, Defence's EBC agreed that MECC should provide an annual performance report in the form of a dashboard report to the EBC, as well as a quarterly dashboard report for

32 Defence senior leaders also received: an 'Overdue pipeline report' tracking overdue ministerial briefs and correspondence within the Department across eight weekly periods from June 2018 until April 2019; and a media issues report which provides high-level identification of current, emerging, potential and ongoing media-sensitive issues across Defence from November 2018 to May 2019.

group heads and service chiefs. Dashboard reports have been provided to the EBC in August 2018 and August 2019. Each report included data on the timeliness of ministerial correspondence, ministerial briefs, question time briefs and media enquiries. Defence advised the ANAO that the quarterly reports were discontinued as the same information is contained in the weekly report provided to the same cohort.

2.22 In May 2019, MECC sought feedback from Defence groups and the Services on the ongoing usefulness of its weekly reports. Feedback included: questions about the usefulness of the timeliness report without additional analysis to explain the methodology, for example who has set the deadline, and reasons for delays; a need for longer term analysis; and positive feedback attributing the timeliness report to a reduction in overdue items. Defence advised the ANAO that MECC also receives feedback at the weekly roundtable regarding the reporting style, and adapts the report as required.<sup>33</sup>

### *Matters considered by the Enterprise Business Committee*

2.23 The EBC has considered the following matters in relation to the MECC Division:

- the Secretary's and Chief of the Defence Force's direction that the Associate Secretary and Vice Chief of the Defence Force co-design a new communications arrangement discussed in December 2017. This involved agreement that as a first step, Group Head and Strategic Communications Advisors transfer to MECC in February 2018;
- a proposal for a co-design of MECC (April 2018), including agreement that the proposal be considered by the Defence Committee in May 2018. It was determined that the media and communication function would be best managed by accountability to the Associate Secretary and First Assistant Secretary of MECC, while retaining co-located and embedded teams within Defence groups and the Services;
- performance reporting (May 2018), including a proposed approach to incorporate MECC performance reporting for ministerial, parliamentary and media activity. EBC agreed to a Key Performance Indicator of 85 per cent on time performance for all ministerial, parliamentary, Cabinet and media material<sup>34</sup>;
- social media (August 2018), including a direction to review the use of social media influencers. The meeting also involved discussion on the annual Defence Dashboard report, including improvement of media inquiry timeliness, with further improvement needed; and
- updates on the progress of Defence's Media and Communication Policy development in March and April 2019, to which EBC also provided input.

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33 The weekly roundtable attendees are Defence Senior leaders — the Secretary, Chief of the Defence Force, Associate Secretary, Vice Chief of the Defence Force, group heads and service chiefs.

34 This Key Performance Indicator was included in MECC's 2019–20 Business Plan for media timeliness only. The business plan refers to performance information to be presented to senior leader and ministers, without specifying what these performance indicators are.

## Performance measurement

2.24 The 2018–19 MECC Business Plan contained one performance indicator, which was ‘to measure the extent to which MECC facilitated the Department to meet specific deadlines’.

2.25 The business plan did not provide further information on what the ‘specific’ deadlines were, or provide any baseline measurements or targets. As indicated in Table 2.1 above, MECC provides a weekly email to senior leaders with data on the timeliness of responses to media enquiries, and as discussed in paragraph 2.20, timeliness data is also included in the weekly email to the Associate Secretary. The 2018 and 2019 dashboard reports to the EBC (discussed in paragraph 2.21) also provided timeliness data.

2.26 The 2019–20 MECC Business Plan sets out actions, performance measures, targets and responsible officers against five business plan priorities. The plan includes a media timeliness target of over 85 per cent, along with other measures that focus on inputs and outputs — for example, staffing positions in place in line with the organisation reform and new systems being delivered. These performance measures include the following actions to be undertaken to support the business plan priority of measuring performance:

- publishing a suite of information that provides leaders with advice on the status of parliamentary, Cabinet and media performance; and
- ensuring ministerial offices have visibility of performance and timeliness measures.

2.27 The plan does not elaborate on what information or performance measures will be included in the reporting to leaders and ministerial offices.

## 3. Management of planned activities

### Areas examined

This chapter examines the extent to which Defence has established guidance and communication plans for its planned media and communications activities, and implemented fit-for-purpose arrangements for monitoring and reporting on the outcomes of these activities.

### Conclusion

Defence has developed guidance and templates for its planned media and communications activities which are largely fit-for-purpose. However, there is inconsistent application of guidance and requirements, including clearances, development of communication plans, and evaluation activity.

### Area for improvement

The ANAO has made one recommendation aimed at Defence clarifying its expectations regarding evaluations of planned activities. There is also scope for Defence to consider implementing arrangements to provide assurance that planned activities requiring a communication plan have one.

3.1 The following criteria were used to assess whether Defence has established guidance and communication plans for its planned media and communications activities, and implemented fit-for-purpose the arrangements in place for monitoring and reporting on the outcomes of these activities:

- has Defence developed fit-for-purpose guidance and plans for planned media and communications activities, which address budget issues and how the outcomes of planned activities will contribute to the delivery of objectives; and
- does Defence monitor the delivery of its public communications and media activities against planned outcomes and budgets.

### Has Defence developed fit-for-purpose guidance and plans for planned media and communications activities, which address budget issues and how the outcomes of planned activities will contribute to the delivery of objectives?

The Defence Communication Manual, in place until mid-2019, included guidance and a recommended template for the development of communication plans for planned activities, although it did not specify which planned activities required communication plans. Defence issued a Media and Communication Policy in July 2019, with clearer expectations around which activities should have communications plans developed, although there are no arrangements in place to ensure that all activities that require a communication plan have one. The template provided to staff to guide their development of communication plans, under the manual and the policy, includes fields for budget and evaluating outcomes. Neither the policy nor other guidance prescribes usage of the template, and there is variability in the types of information included in Defence communication plans.

Of the 197 communication plans located by Defence for ANAO review, only 40 per cent (79 plans) were cleared at the level of seniority required by the manual. While the plans mostly set out the activities to be undertaken — including key messages, communication objectives, target audiences and stakeholders — only 23 per cent of plans included budget information and 49 per cent included criteria for evaluating the outcomes of the activity. Risks and sensitivities were considered in 68 per cent of communication plans.

3.2 Defence undertakes a range of planned activities which have a public communication and media element. These include: corporate events and campaigns endorsed by the Enterprise Business Committee; strategic engagement events for departmental announcements; planned operations such as Exercise Talisman-Sabre; and community engagement events (such as town hall meetings and public service information sessions about issues related to Defence activities that may affect local communities). To facilitate its management of planned activities, Defence produces a range of communication plans, which include communication and engagement strategy documents and public affairs plans.

### Policy and guidance for planned activities

3.3 The Defence Communication Manual (the manual) was in effect from December 2016 to July 2019 and set out the policy and guidance for planned activities. The manual provided guidance for Defence officials to organise and lead the organisation and planning of events and campaigns. The manual was issued by the Associate Secretary and Vice Chief of the Defence Force and was applicable to all Defence personnel. It stated that the Secretary and Chief of the Defence Force ‘require Defence personnel to comply with provisions in manuals unless the particular circumstances warrant departure from the provisions’.<sup>35</sup>

3.4 To assist personnel in preparing a communication plan, the manual included advice for drafters and a ‘suggested’ communication plan template. The manual did not specify what (if any) activities required a communication plan, stating that ‘the communication plan should be drafted during the planning stage and should ensure all areas of an event or campaign are covered’.<sup>36</sup> The ANAO has interpreted this as an expectation by Defence that all events or campaigns have a communication plan developed and has audited accordingly. The communications plan template included the following sections:

- introduction and/or background section;
- project objective, which is defined as the ‘end-state for this project and what you are trying to achieve’;
- communication aim and/or communication objectives, which should be ‘clear, specific and measurable [and focus] on realistic objectives within the timeframe, budget and resources’;
- key messages or themes;
- audiences, both internal and external;

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35 Department of Defence, *Defence Communication Manual*, 16 December 2016, p. i.

36 *ibid.*, pp. 4–3.

- key stakeholders, defined as ‘those who have a vested interest in the communication outcomes and need to be updated on the outcomes of this communication plan’;
- spokespeople authorised to communicate key messages and, importantly, ‘how they will be briefed’;
- budget;
- sensitivities and risks;
- clearance of communication products;
- evaluation, defined as ‘how will you evaluate whether you met your objectives? This is how you will demonstrate the success of your work’; and
- consultation.

3.5 The manual also stated that communication plans:

Must be cleared by a Band-1 or 1-Star or higher. It may require clearance from the Secretary or Chief of the Defence Force in certain circumstances including, but not limited to, instances when a Defence event or campaign features ministerial or Defence Senior Leadership involvement, or when the event or campaign concerns a sensitive issue.<sup>37</sup>

3.6 The manual did not define or describe what constitutes a sensitive issue.

3.7 Defence’s July 2019 Media and Communication Policy (the policy) was also issued by the Associate Secretary and Vice Chief of the Defence Force. The policy states that the Secretary and Chief of the Defence Force ‘require Defence personnel to comply with provisions in the policy unless the particular circumstances warrant departure from the provisions’.<sup>38</sup> The policy more clearly documents Defence’s expectations regarding activities that should have communication plans developed for them, and states that:

Operations, exercises or major events likely to attract media interest must have a communication plan, including opportunities for media and social media, prepared by the embedded teams with MPAO [Military Public Affairs Officers] and RMPA [Regional Manager Public Affairs] support as appropriate.<sup>39</sup>

3.8 The Communications Toolkit supporting the 2019 policy contains a communication plan template, however, neither the policy nor the toolkit prescribe usage of the template.<sup>40</sup>

3.9 The 2019 policy provides less guidance about clearance requirements than the manual. It refers in more general terms:

- to ‘relevant clearance level and response timeframes according to the nature, sensitivity, urgency and potential impact of the enquiry on Defence and its reputation’ for Defence media enquiries; and
- that ‘appropriate clearance must be obtained’ for Defence spokespeople.<sup>41</sup>

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37 *ibid.*, p. 44.

38 Department of Defence, *Media and Communication Policy*, 15 July 2019, p. 2.

39 *ibid.*, p. 14.

40 This template remains largely unchanged from the template contained in the manual.

41 Department of Defence, *Media and Communication Policy*, 15 July 2019, p. 11 and p. 13.



**Implementation of policy and guidance — analysis of 197 communication plans**

3.10 In July 2019, Defence provided the ANAO with 197 communication plans (including communication and engagement strategy documents and public affairs plans) produced between 1 January 2017 and 30 June 2019. Defence advised that while the department had attempted to locate all plans produced by the group or service responsible for the event during this period, it could not confirm that this was an exhaustive list of the communication plans produced. Table 3.1 below lists the (located) plans developed by Defence groups and the Services for planned activities during this period.

3.11 As discussed in paragraph 3.4, the ANAO has interpreted Defence guidance — as set out in the manual which had effect until July 2019 — as requiring that all events or campaigns have a communication plan developed. To support compliance with the new media and communication policy released in July 2019, it would be beneficial for Defence to consider implementing arrangements to provide assurance that communication plans are developed for activities that require them.

**Table 3.1: Defence’s communication plans for planned activities during the period 1 January 2017 and 30 June 2019**

| Group or Service responsible for event or campaign         | Number of communication plans in 2017 | Number of communication plans in 2018 | Number of communication plans to 30 June 2019 | Total      |
|--|---------------------------------------|---------------------------------------|---|------------|
| MECC Media and Communications Branch (MCB)                 | 5                                     | 7                                     | 6   | <b>18</b>  |
| Navy   | 0                                     | 1                                     | 12  | <b>13</b>  |
| Army   | 4                                     | 12                                    | 8   | <b>24</b>  |
| Air Force  | 7                                     | 9                                     | 2   | <b>18</b>  |
| Headquarters Joint Operations Command (HQJOC) <sup>a</sup> | 3                                     | 5                                     | 5   | <b>13</b>  |
| Capability Acquisition and Sustainment Group (CASG)        | 4                                     | 1                                     | 0   | <b>5</b>   |
| Defence People Group (DPG) <sup>b</sup>                    | 20                                    | 18                                    | 8   | <b>46</b>  |
| Estate and Infrastructure (E&IG)                           | 2                                     | 26                                    | 6   | <b>34</b>  |
| Joint Capabilities Group (JCG) <sup>c</sup>                | 3                                     | 6                                     | 3   | <b>12</b>  |
| Military Information Effects (MIE) Branch <sup>d</sup>     | 4                                     | 2                                     | 0   | <b>6</b>   |
| Regional Managers for Public Affairs (RMPAs) <sup>e</sup>  | 1                                     | 4                                     | 3   | <b>8</b>   |
| <b>Total</b>   | <b>53</b>                             | <b>91</b>                             | <b>53</b>                                     | <b>197</b> |

Note a: The function of HQJOC is to plan, control and conduct military campaigns, operations, joint exercises and other activities in order to meet Australia’s national objectives.

Note b: DPG also includes communication plans produced by Defence Community Organisation (DCO) and Directorate of People Intelligence and Research.

Note c: JCG consists of the Australian Defence College, Information Warfare Division, Joint Military Police Unit, Joint Health Command, Joint Logistics Command, Women, Peace and Security, Reserve and Youth Division, the Australian Civil-Military Centre and ADF Sport.

Note d: MIE Branch has changed its name to Military Strategic Effects (MSE) Branch. The Military Strategic Effects (MSE) Branch provides communication support for operational and specific ADF strategic and reputational issues in order to appropriately engage with government, other agencies, allies, coalition partners and the Australian and international communities.

Note e: MECC provides a team of embedded RMPAs, who assist each group and Service in the coordination of media enquiries, issues and events in their region.

Source: ANAO analysis of documents provided by the Department of Defence.

3.12 As discussed, the manual was the guidance document in place during audit fieldwork and was the basis for analysis. The ANAO assessed Defence’s communication plans developed during the period 1 January 2017 to 30 June 2019 against the communications template suggested in the manual. This assessment is set out in Table 3.2.

**Table 3.2: ANAO assessment of Defence’s communication plans against the manual’s suggested template<sup>a</sup>**

| Group, Service or Branch | Introduction and/or background (%) | Project objectives (%) | Communication aim or objectives (%) | Key messages (%) | Identified audience (%) | Identified stakeholders (%) | Identified spokespeople (%) <sup>b</sup> | Budget <sup>c</sup> (%) | Considered risk and/or sensitivities (%) | Included risk mitigation (%) | Cleared at correct level (%) <sup>d</sup> | Included evaluation criteria (%) |
|--------------------------|------------------------------------|------------------------|-------------------------------------|------------------|-------------------------|-----------------------------|--|-------------------------|--|------------------------------|---|----------------------------------|
| <b>MCB</b>               | 100                                | 100                    | 100                                 | 100              | 100                     | 72                          | 78                                       | 17                      | 83                                       | 61                           | 61  | 78                               |
| <b>Navy</b>              | 100                                | 100                    | 100                                 | 100              | 85                      | 54                          | 31                                       | 0                       | 54                                       | 0                            | 38  | 46                               |
| <b>Army</b>              | 100                                | 100                    | 96                                  | 100              | 88                      | 17                          | 96                                       | 8                       | 96                                       | 58                           | 33  | 38                               |
| <b>Air Force</b>         | 100                                | 72                     | 100                                 | 100              | 100                     | 94                          | 94                                       | 22                      | 94                                       | 61                           | 17  | 83                               |
| <b>HQJOC</b>             | 100                                | 92                     | 77                                  | 100              | 69                      | 69                          | 77                                       | 15                      | 54                                       | 23                           | 15  | 23                               |
| <b>CASG</b>              | 60                                 | 100                    | 80                                  | 80               | 0                       | 80                          | 40                                       | 0                       | 40                                       | 20                           | 20  | 60                               |
| <b>DPG</b>               | 100                                | 100                    | 100                                 | 100              | 96                      | 96                          | 59                                       | 65                      | 96                                       | 89                           | 73  | 74                               |
| <b>E&amp;IG</b>          | 9                                  | 12                     | 12                                  | 88               | 82                      | 85                          | 9  | 0                       | 0  | 0                            | 3   | 3                                |
| <b>JCG</b>               | 100                                | 100                    | 100                                 | 100              | 92                      | 83                          | 100                                      | 8                       | 58                                       | 42                           | 42  | 25                               |
| <b>MIE Branch</b>        | 100                                | 100                    | 100                                 | 100              | 100                     | 100                         | 100                                      | 50                      | 100                                      | 100                          | 83  | 100                              |
| <b>RMPAs</b>             | 100                                | 100                    | 88                                  | 100              | 75                      | 75                          | 88                                       | 13                      | 75                                       | 38                           | 50  | 25                               |

Note a: Colours denote percentage of communication plans that included suggested information as outlined the manual: Grey blue = 0–49%; Blue = 50–74%; Dark blue = 75–100%.

Note b: Plans that considered the need for spokespeople but did not identify spokespeople were considered to have appropriately considered the template’s recommendation for this section.

Note c: Plans that noted the cost of the activity would be absorbed through other parts of the department’s budget were counted as including information on the budget.

Note d: Plans that were counted as not being cleared at the correct level included plans that were not cleared, cleared by someone at a less senior level than required by the manual, or that had a name but no date or signature.

Note: MCB is the Media and Communications Branch; HQJOC is the Headquarters Joint Operational Command; CASG is the Capability Acquisitions and Sustainment Group; DPG is the Defence People Group; E&IG is the Estate and Infrastructure Group; JCG is the Joint Capabilities Group; MIE is Military Information Effects Branch; and RMPAs is the Regional Managers for Public Affairs.

Source: ANAO analysis of documents provided by the Department of Defence.

3.13 The analysis in Table 3.2 indicates that there was variation in the adoption of suggested inclusions in the communication plans produced by different Defence groups, Services and the Media and Communications Branch (MCB). Except for budgetary information, the MCB largely adopted the manual's template communication plan, whereas the Services and groups tailored the template, employing the discretion afforded them by the manual.

*Events and campaigns led by the ADF (Navy, Army, Air Force and HQJOC)*

3.14 For the period 1 January 2017 to 30 June 2019, Defence provided the ANAO with 68 communication plans produced by the ADF Services. Defence provided 13 communication plans by Navy, 24 by Army, 18 by Air Force and 13 by Headquarters Joint Operations Command (HQJOC). Navy, Army, Air Force and HQJOC each tailored the template with their own style and branding.

3.15 Navy's communication plans covered major exercises, strategic plans, public affairs messages and campaigns directed at improving its workforce. Of Navy's 13 communication plans:

- Five plans (38 per cent) complied with the manual's requirement for clearances of communication plans at the SES Band 1 or ADF 1 Star level or above.
- None included budget information, six plans (46 per cent) include evaluation criteria, and seven plans (54 per cent) considered risks and sensitivities.

3.16 Army developed communication plans for commemoration events and for communicating strategies for workforce alignment and capability acquisition milestones. Of Army's 24 communication plans:

- Eight plans (33 per cent) complied with the manual's requirement for clearances of communication plans at the SES Band 1 or ADF 1 Star level or above.
- 23 plans (96 per cent) included information and clearances for spokespeople, with a majority clearly identifying individuals, ranks and positions. A small number stated that all Army leadership could act as spokespersons. Other events (such as ANZAC Day parades) have blanket authorisation contingent upon individuals complying with guidelines, such as the use of event-specific talking points.
- One of the two Army communication plans with budgetary information — Army's communication strategy for Land Forces Conference 2018 — referred to both resources and costs for printing, promotional and event material.
- Defence advised the ANAO in August 2019 that there are no evaluation plans for Army's events or campaigns for the period 2017–19 (see paragraph 3.30).

3.17 Air Force's communication plans included public affairs plans for flyovers at public events and communication strategies for the arrival of capability acquisitions at bases. The majority of Air Force's communication plans (14 of 18) were in relation to its presence at sporting events. Of Air Force's 18 communication plans:

- Three plans (17 per cent) complied with the manual's requirement for clearances of communication plans at the SES Band 1 or ADF 1 Star level or above. The remaining 15 communication plans were cleared by an officer below the required rank. Defence advised that for some low-level public events, Air Force Headquarters has verbally delegated authority to approve communication plans to an officer below the required

rank. It was not clear whether this delegation was in place when the 15 communication plans were cleared or whether the plans cleared were covered by the verbal delegation.

- 15 plans (83 per cent) included evaluation criteria or measures for evaluating performance. Defence advised the ANAO in August 2019 that there are no evaluations/lessons learnt documents for any of Air Force's communication plans in the 2017–19 period (see paragraph 3.30).

3.18 Defence's HQJOC, which plans events and campaigns that are jointly conducted by the Services, produced 13 communication plans. These comprised plans for joint exercises, public affairs notices for ADF operations and communication packs for ADF assistant projects (for example, for assistance during the Queensland floods of 2019). Of these communication plans:

- 10 plans (77 per cent) included information and clearances for spokespeople, which clearly specified the individuals, ranks and positions authorised to speak. At times, where a blanket authorisation was given, it was limited. For example, one authorisation stated that:

As a general principal, the media should not be restricted unnecessarily from speaking with ADF personnel who have been provided with a brief on the approved key messages. Official comment needs to be directed to approved spokespersons.<sup>42</sup>

- 11 plans (85 per cent) were either cleared by Group Captains or Squadron Leaders — below the required SES Band 1 or ADF 1 Star level — or no clearance was evident in the document.
- 11 plans (85 per cent) did not include budget information. The two HQJOC activities that contained budget plans were for Exercise Talisman-Sabre in July 2017 and Operation Resolute Enhanced Force Posture in September 2018.

3.19 The communication plan prepared by the ADF for Exercise Talisman-Sabre 2019 is discussed in more detail below.

#### Case study 1. Exercise Talisman-Sabre 2019

Exercise Talisman-Sabre is a bilateral combined Australian and United States (US) training activity, conducted every two years. It is designed to practise the respective military services and associated agencies in planning and conducting Combined and Joint Task Force operations, and improve the combat readiness and interoperability between Australian and US forces.<sup>43</sup>

Defence conducted Exercise Talisman-Sabre 2019 between late June and early August, with exercise activities in a number of different areas in Queensland.

Exercise Talisman-Sabre is a joint event between the three ADF Services and HQJOC is responsible for its planning and organisation. HQJOC created a communication pack and a public affairs plan. The Public Affairs Plan for Exercise Talisman-Sabre 2019 was approved on 19 June 2019 and included details on:

42 Department of Defence, HQJOC, *Operation Augury 2017 Public Affairs Plan*, Public Affairs Plan, November 2017.

43 Department of Defence, *Exercises: Talisman Sabre 2019* [Internet], Department of Defence, available from <http://www.defence.gov.au/exercises/ts19/> [accessed 13 August 2019].

- the context of the exercises and the communication objective;
- internal roles and responsibilities for communication activities;
- risks and sensitivities, without mitigation strategies;
- identification of target audiences; and
- media events and schedules.

Under the Defence Communication Manual, a Public Affairs Plan should be cleared at the 1 Star or SES Band 1 level, or higher. The Exercise Talisman Sabre Public Affairs Plan was cleared by the appropriate senior officers as required by the manual.

The Plan was accompanied by three other supporting documents:

- Strategic Shaping and Influencing Guidance for Talisman-Sabre 2019, dated 16 November 2018;
- Exercise Talisman-Sabre 2019 Engagement Directive; and
- Public Affairs Guidance for Exercise Talisman-Sabre 2019.

### *Events and campaigns led by Defence groups*

3.20 For the period 1 January 2017 to 30 June 2019, of the 197 communication plans Defence provided to the ANAO, 129 were produced by Defence groups.<sup>44</sup> Table 3.2 indicates that there was a significant difference in communication plan output between the Defence groups, with Defence People Group (DPG) developing 46 communication plans and the Capability Acquisition and Sustainment Group (CASG) producing five plans. Similar to the ADF Services, the Defence groups have tailored the template with their own style and branding for communication plans.

3.21 The MCB is responsible for the development of plans for a number of set corporate events, including: ANZAC Day, ADF Legacy Week, the Defence Blood Challenge, International Women’s Day, NAIDOC Week, Remembrance Day, White Ribbon Day and various Defence sporting events. MCB is the lead group for corporate events and campaigns and largely followed the structure and format of communication plans recommended in the manual.

3.22 Employing the discretion afforded them by the manual, CASG produced communication strategies in alternative formats rather than communication plans as recommended by the manual. The format adopted by CASG largely omitted spokespersons or budgets and resource allocation, and there was limited information about the clearance process for these documents.

3.23 Of the 129 communication plans developed by Defence groups and examined by the ANAO:

- 91 plans (71 per cent) did not include budget information. Those communication plans with budget information provided no information as to where funding is being sourced from within Defence. In August 2019, Defence advised the ANAO that 13 (10 per cent) of these 129 communication plans had budget costings, but they were mostly omitted from the actual communication plans ahead of the event or campaign.

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44 See Table 3.1 for a list of Defence groups that produced communication plans during the period 1 January 2017 to 30 June 2019.

- 61 plans (47 per cent) were cleared at the SES Band 1 or ADF 1-Star level or above, as required by the manual.
- 63 plans (49 per cent) included evaluation criteria or measures for evaluating performance in delivering the event or campaign. In September 2019, Defence provided 23 evaluations from E&IG, and one from DPG (see paragraph 3.30).

### Summary

3.24 Defence located 197 communication plans for the period 1 January 2017 to 30 June 2019. Of these, 79 plans (40 per cent) were cleared at the correct level in accordance with the manual, with the remaining 118 plans (60 per cent) either cleared at a lower level than required or not cleared. Most of the plans outlined background information, objectives, communication aims and key messages for planned media and communication activities. Around 75 per cent of the plans also identified target audiences, stakeholders and spokespeople. Of the 197 plans:

- 46 plans (23 per cent) included budget information;
- 134 plans (68 per cent) considered risks and sensitivities; and
- 96 plans (49 per cent) included evaluation criteria.

3.25 The manual's template states that the purpose of communication plans is that: 'anyone should be able to pick up this document and understand what you are aiming to achieve.'<sup>45</sup> Further, the manual's template encourages Services and groups to:

State the specific objectives you will strive to meet. They need to be clear, specific and measurable. Focus on realistic objectives within the timeframe, budget and resources. State what you hope to achieve in terms of the target audience.<sup>46</sup>

3.26 The significant variability in communication plans does not enable 'anyone' to pick up the plan and understand the objective of the activity. Conventions relating to the preparation of routine plans and reports deliver consistency, which aids efficiency for both the preparer of the document and the reader.

## Does Defence monitor the delivery of its public communications and media activities against planned outcomes and budgets?

Defence cannot monitor the delivery or effectiveness of all its public communications and media activities against planned outcomes and budgets, because it does not always include evaluation criteria in its communication plans or routinely undertake evaluation activity.

Less than half of the communication plans reviewed by the ANAO included evaluation criteria to measure performance and delivery against expected outcomes, and only 12 per cent of the planned activities reviewed by the ANAO had been evaluated. There is a lack of clarity around evaluation requirements in Defence's Media and Communication Policy.

45 Department of Defence, *Defence Communication Manual*, 16 December 2016, p. 46.

46 *ibid*, p. 46.

3.27 The Defence Communication Manual (the manual) stated that:

Once a Defence campaign or event is completed, an Evaluation/Lessons Learned document should be finalised within five business days of the event being held. Measurements of success can be included in this document.<sup>47</sup>

3.28 The manual provided a suggested template for evaluations and lessons learned from events and campaigns. The template included a section that stated:

Based on the information you provided in the Communication Plan, demonstrate the success of your work. Did you achieve what you set out to achieve?<sup>48</sup>

3.29 Defence does not always include criteria to evaluate an activity in its communication plans or routinely monitor the delivery of its planned activities. Table 3.2 shows that 96 (49 per cent) of the 197 communication plans reviewed by the ANAO included evaluation criteria to measure performance and delivery against expected outcomes.

3.30 In September 2019, Defence provided the ANAO with 24 evaluations/lessons learned documents: 23 from E&IG and one from DPG<sup>49</sup>, equating to 12 per cent of the communication plans reviewed by the ANAO being evaluated. Of the 24 evaluation plans provided, 23 were completed within the five days required by the manual. Despite being the policy owner, MCB did not evaluate any of its 18 communications events or campaigns in the period under review.<sup>50</sup>

3.31 The manual's template drew a link between effective planning through communication plans and self-assessment through the evaluations, the purpose of which is to:

Describe what [Defence's groups and Services have] done really well and what hasn't worked ... Based on the information provided in the Communication Plan, demonstrate the success of [their] work. Did [they] achieve what [they] set out to achieve?<sup>51</sup>

3.32 By not consistently completing evaluations for the 197 planned activities in the period 1 January 2017 to 30 June 2019, Defence missed the opportunity to reflect on lessons learned from its planned media and communication activities.

3.33 As noted in paragraph 3.7, the July 2019 policy requires some planned communications and media events to have a communication plan prepared. A communication plan and evaluation/lessons learned template is included as part of the supporting Communications Toolkit to prompt organisers of planned events to complete them, however the completion of the evaluation/lessons learned document is not prescribed in the policy, and therefore can be seen as a discretionary activity. These templates remain largely unchanged from those included in the now superseded manual.<sup>52</sup> The manual also noted that the evaluation/lessons learned document should

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47 *ibid.*, p. 44.

48 Department of Defence, *Defence Communication Manual*, 16 December 2016, pp. 46–47.

49 Not all of these evaluations had evaluation criteria included in the communications plan for the activity (see Table 3.2 for further detail).

50 Fourteen MCB communication plans included evaluation criteria.

51 Department of Defence, *Defence Communication Manual*, 16 December 2016, p. 49.

52 The manual noted that the templates were the suggested templates. The policy does not provide guidance as to whether these are the suggested or required templates.



be completed within five business days of the event occurring, while the policy does not provide any direction of the timing of these activities.

3.34 In light of the findings above, in particular the absence of guidance relating to evaluations and the reiterative nature of a number of planned media and communication activities<sup>53</sup>, Defence should clarify its expectations for the evaluation of planned activities and introduce arrangements to provide assurance that evaluations are conducted as expected and in a timely manner.

## Recommendation no.2

3.35 Defence clarify its expectations for the evaluation of planned activities and introduce arrangements to provide assurance that evaluations are completed as expected and in a timely manner.

**Department of Defence response:** *Agree.*

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53 For example corporate events, Defence operations and exercises, attendance at community events.

## 4. Management of routine activities

### Areas examined

This chapter examines the extent to which Defence has established policies, procedures and processes to support the delivery of its routine public communications and media activities. This chapter also examines the monitoring and reporting arrangements in place for these activities.

### Conclusion

Defence has established policies and processes to guide the delivery of its routine public communications and media activities, including the management of media enquiries. Defence has identified concerns relating to its responsiveness to media enquiries and has introduced arrangements to prioritise its efforts and improve timeliness.

In the absence of a clearly documented overarching objective for Defence's media and public communications activities, reporting on the delivery of routine activities is primarily focused on output measures such as the number of media enquiries and the time taken to respond.

### Area for improvement

Defence guidance could provide more specific advice to its personnel on protocols for preserving public confidence and perceptions of APS and ADF impartiality in circumstances where Defence personnel make public appearances with ministers and overtly political issues arise.

Following the introduction of its triage arrangements for prioritising media inquiries, there is benefit in Defence informing external stakeholders of the timeframes it is working to.

4.1 The following criteria were used to assess whether Defence has established guidance and arrangements for monitoring and reporting on the delivery of routine public communications and media activities:

- has Defence established guidance and processes for the effective management of its routine public communications and media activities; and
- does Defence monitor and report on the delivery of routine activities.

### Has Defence established guidance and processes for the effective management of its routine public communications and media activities?

Defence has established policies and processes to guide the delivery of its routine activities, including a policy framework under which public communication and media activities are undertaken, and a process for the timely and appropriate clearance of media enquiries. Following the release of its new Media and Communication Policy in July 2019, and in response to stakeholder concerns, Defence has introduced a 'triage' arrangement to prioritise its efforts and improve timeliness. Defence records indicate that mandated processes for engaging with external media and registering media contacts have not been consistently applied, and in these cases Defence could not be certain that the release of information had been approved.

While there are clear expectations regarding impartiality and non-partisanship in APS and ADF dealings with the public and the media, there is scope for Defence to provide more specific guidance to its personnel on protocols for preserving public confidence and perceptions of

impartiality in circumstances where Defence personnel make public appearances with ministers and overtly political issues arise.

4.2 Defence undertakes a range of routine or business as usual public communications and media activities. These include: responding to requests for information from journalists and media outlets; producing the Defence Magazine<sup>54</sup> and three Service newspapers; managing the department's social media channels; and managing the production and release of image and video content. The guidance and processes applying to these activities are outlined in the next section.

### Guidance, administrative processes and their implementation

4.3 The Defence Communication Manual (the manual) in place until July 2019 was 'aimed at informing and assisting Defence personnel engage in communication and public affairs activities in, and on behalf of, Defence'. It set out the expectations of the Secretary and Chief of the Defence Force on how to conduct the routine communication and public affairs functions of:

- media relations, including responding to enquiries from the media;
- social media;
- multimedia;
- publication of the three Service newspapers and the Defence Magazine; and
- corporate brand management.<sup>55</sup>

4.4 Defence's implementation of the guidance for these functions is discussed below.

#### *Managing media enquiries*

4.5 Table 4.1 below shows the number of media enquires recorded by Defence for the period March 2017 to June 2019.<sup>56</sup>

**Table 4.1: Number of media enquiries recorded, March 2017 to September 2019**

|                                     | 2017 <sup>a</sup> | 2018  | 2019 <sup>b</sup> |
|-------------------------------------|-------------------|-------|-------------------|
| Total enquires recorded as received | 1,090             | 2,464 | 1,202             |

Note a: Defence advised that prior to March 2017, media enquiries were managed through another ICT system which is no longer available.

Note b: As at September 2019.

Source: Department of Defence data.

4.6 The manual provided guidance on responding to media enquiries and engaging with the media. The media is described as a channel used by Defence to increase public awareness and understanding of Defence's activities and strategic priorities. Within the Media and Communications Branch (MCB)<sup>57</sup>, the Defence Media team is responsible for coordinating and

54 Production of the Defence Magazine ended in March 2019 following the introduction of an online Defence news service.

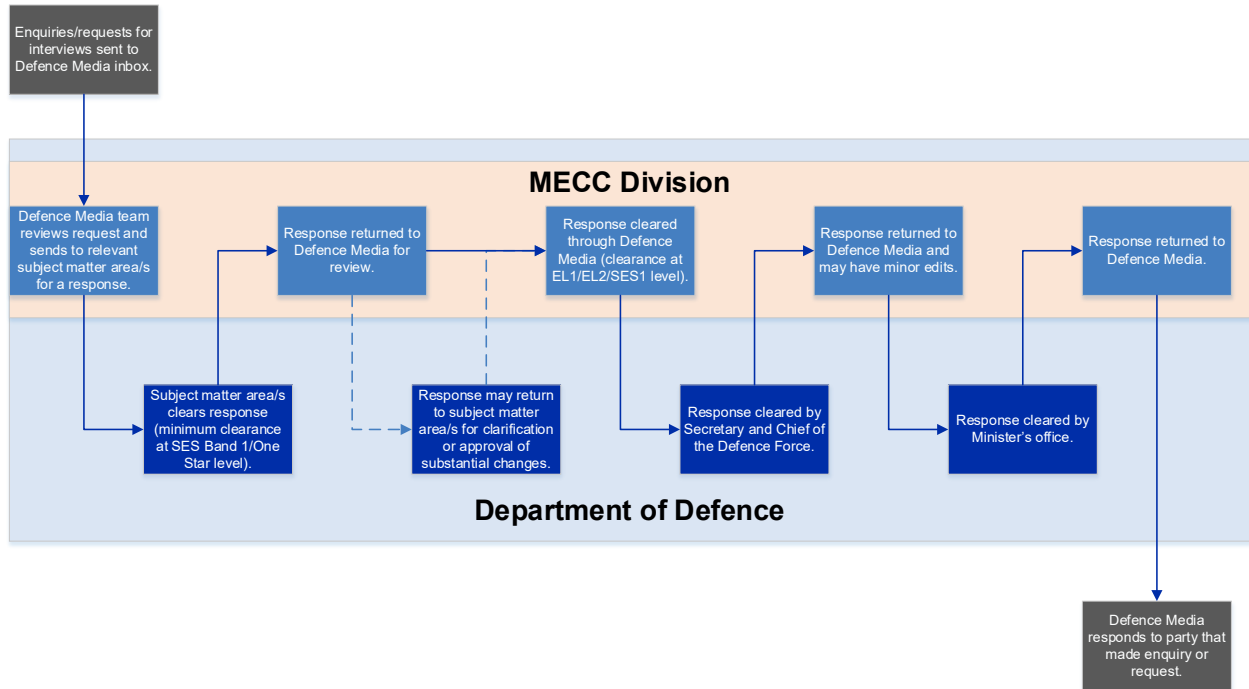
55 The manual also provided guidance on event planning (discussed in chapter 3 of this audit) and crisis management.

56 Further information on media enquiries is provided in Table 4.5.

57 The organisational structure of MECC Division is shown in chapter 1, Figure 1.1.

managing all enquiries from the media. To support staff in undertaking this role, the Defence Media team developed a Standard Operating Procedure (SOP).<sup>58</sup> Figure 4.1 below sets out the process for managing media enquiries according to the SOP that was being applied at June 2019.<sup>59</sup>

**Figure 4.1: Process for managing media enquiries as at June 2019**



Source: ANAO analysis of Department of Defence documentation.

4.7 As shown in Figure 4.1, Defence’s process is that all media enquiries should be sent to the organisation via the Defence Media inbox:

- Once received in the inbox, the request is actioned by the Defence Media team and sent to the appropriate subject matter area/s for preparation of a response.
- Following clearance of the response by the subject matter area/s, the response is provided to Defence Media for review and editorial input (if required) and cleared by the Defence Media team. It is then sent to the offices of the Secretary of Defence and Chief of the Defence Force for clearance.
- Once cleared by the offices of the Secretary and Chief of the Defence Force, the response is provided to the relevant ministerial office(s) for clearance or noting prior to being returned to the Defence Media team to provide the response to the journalist or media outlet.

4.8 Under this arrangement, Defence did not differentiate between media enquiries and requests for interviews, or ‘triage’ media enquiries according to priority. Defence advised the ANAO

58 Within MECC Division, there is no formal induction process. Following the MECC organisational reform, which led to the creation of a number of new positions and the transfer of staff, a number of Standard Operating Procedures have also been developed, or are in the process of being developed, by individual teams.

59 New arrangements that were introduced in July 2019 are discussed in paragraph 4.12.

that this arrangement was implemented on the basis of a verbal instruction from the Ministers' offices. Defence further advised that 'part of the rationale for the Defence media reform was a desire within Defence to improve timeliness and accountability'.

4.9 Media industry stakeholders advised the ANAO<sup>60</sup> that Defence's approach of not triaging media inquiries had frequently impacted on journalists' ability to meet work deadlines and had damaged Defence's reputation for managing stakeholder relations.

4.10 More broadly, media and other stakeholders commented, in submissions to the ANAO, on what they perceived to be a risk averse media and communications culture which affected Defence's: external accountability; contribution to public understanding of its activities; and contribution to informed debate about Defence matters.

4.11 Stakeholders also indicated that they valued flexibility and responsiveness in Defence's processes and relationship with the media and improved access to Defence subject matter experts, in the interests of: facilitating external scrutiny; enriching public debate in an area of significant national investment; and assisting defence in communicating its purpose to the broader community. At a more practical level, stakeholders indicated that such flexibility and responsiveness would assist in avoiding misreporting and unnecessary delays (for example to deadlines) which can result from the rigid application of the Defence media management processes outlined in Figure 4.1. In their submissions to the ANAO, a number of stakeholders described workarounds for eliciting a faster response to enquiries, such as going directly to ministerial offices even in cases where the enquiry related to a departmental matter.<sup>61</sup> During the course of the audit, the ANAO also identified instances where the Defence media enquiry process described in Figure 4.1 was not followed, and local judgements were made.

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60 Excerpts from stakeholder submissions received by the ANAO are included in Appendix 3.

61 Defence advised the ANAO in October 2019 that 'journalists are reminded regularly that the Defence Media team should be their only point of contact for Defence related media enquiries. Using the correct Defence media enquiry process protocol ensures that all information is cleared and protected appropriately.'

4.12 Both the previous manual and the succeeding policy note the importance of timely responses to media enquiries, to avoid reputational damage to Defence, or the use by media of potentially inaccurate information in the absence of a formal Defence response. Defence advised the ANAO that responsiveness to media enquiries had been identified as a concern by ministers, ministerial staff and senior officials for a number of years. In July 2019, following the release of the new policy, Defence implemented a new triage matrix for prioritising media enquiries. Under this matrix:

- priority one (highest priority) enquiries have a three hour timeframe for a response to be provided<sup>62</sup>; and
- response times for priority two and three requests will be based on the journalist's requested date for a response where practicable, with priority three requests managed by the relevant subject matter area.

4.13 Under the new triage matrix, all enquiries continue to require clearance at the SES Band 1 or 1 Star level in the subject matter area.<sup>63</sup> The embedded MECC Director is also required to provide clearance of priority one and two enquiries, as well as requests for interviews with Defence personnel which are triaged as priority three requests. Priority one enquiries also continue to require final clearance by the relevant ministerial office(s), and priority two enquiries receive final clearance by the Secretary and/or Chief of the Defence Force where appropriate.<sup>64</sup> Priority three enquiries receive final clearance at the subject matter level by the responsible SES Band 1 or 1 Star officer. There would be benefit in Defence informing external stakeholders of the timeframes it is working to.

4.14 Defence plans to establish a new reporting tool to collect information on its handling times and other matters. The planned tool is discussed at paragraphs 4.51 to 4.52 below.

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62 Priority one enquiries include incidents relating to: ministers; Defence members or bases; Defence exercises; natural disasters; rescue missions; Defence Assistance to the Civil Community taskings; and national security. Other enquiries classified as priority one enquiries include: requests for ministerial statements; significant departmental reports released by Defence; responses to reports/reviews with significant impact on Defence; urgent enquiries received by/from ministers' offices; urgent media enquiries (dependent on level of reputational damage); major program/project announcements; and operational-related requests with significant international implications.

In December 2019, Defence advised the ANAO that 305 priority one enquiries had been received since 1 July 2019, with 238 responses (78 per cent) provided within the three hour timeframe. As noted in paragraph 4.50 and footnote 84, the MECC 2019–20 Business Plan outlined a key performance indicator of 85 per cent of media enquiries provided on time.

63 Defence advised the ANAO in January 2020 that the Secretary and Chief of the Defence Force plan to issue a Directive on supporting Defence Ministers in relation to media and communication. Defence further advised that among the proposed changes is the elevation of the minimum clearance level for all media responses from a Band 1/1 Star officer, to a Band 2/2 Star officer.

64 For priority one enquiries, the Secretary and Chief of the Defence Force will advise the Defence media team if they also wish to clear the response for a particular enquiry. For priority two enquiries, the ministerial office(s) and the Secretary and Chief of the Defence Force will advise the Defence media team if they wish to clear a response for particular enquiries. If not, the response is cleared by the responsible SES Band 1 or 1 Star Officer.

Other guidance for Defence personnel

4.15 Defence has developed a number of templates to assist staff when preparing media releases or responses to media enquiries. These include templates for:

- departmental media releases and individual templates for each minister/assistant minister;
- media alerts; and
- media responses.

4.16 The Defence intranet also contains general guidance to Defence personnel on writing media releases<sup>65</sup>, and templates have been developed for content to be published to Defence's social media platforms.

### *Managing social media, Service newspapers and the Defence Magazine*

4.17 The Defence News Bureau<sup>66</sup>, within MCB, manages the department's social media platforms and Defence digital media as well as producing the official Navy, Army and Air Force newspapers and (until March 2019) the Defence Magazine (which included items on developments and activities across Defence). The annual staffing cost for the Defence News Bureau for 2018–19 was \$2.01 million. The cost of the activities undertaken by the Bureau is shown in Table 4.2.

**Table 4.2: Defence News Bureau staffing levels and cost of activities for 2018–19**

|  | Social media   | Digital media  | Defence news <sup>a</sup>  |
|--|--|--|--|
| Number of staff <sup>b</sup>                                 | 6  | 7  | 11   |
| Annual publication cost                                      | –  | –  | Defence magazine — \$11,172 (printing costs)<br>Service newspapers — \$334,970 (printing and distribution costs) |
| Other costs (for example server costs, analytical tools etc) | \$1.117 million, includes costs for contracted services, equipment, software, travel and training. | \$435,520, includes costs for contracted imagery hosting services, equipment, software, travel and training. | \$124,137, includes costs for on-line hosting services, equipment, software, travel and training.                |

Note a: Defence news includes the production and publication of the Service newspapers and the Defence magazine. Defence advised in October 2019 that the Defence magazine has been discontinued.

Note b: Numbers include both APS and ADF personnel.

Source: Department of Defence documentation.

4.18 Defence advised the ANAO that in 2018–19, an additional \$24,464 was spent on the maintenance and support of a standalone ICT network within the Defence News Bureau.<sup>67</sup>

65 For example: facts should be assembled (who, what, where, how, when and why); writing should be in plain English, using active language; material should be written in the past tense; and the highest ranked person relevant to the media release should be quoted.

66 There are three teams within the Bureau: social media team, digital media team, and the news team.

67 Defence advised that the network was ICT security accredited in September 2017, and was part of a security upgrade to all Defence standalone networks in March 2019.

4.19 The manual outlined that the Service newspapers were permitted to contain paid advertising to assist with the cost of their production, printing and distribution. Defence advised the ANAO that in 2018–19, the Service Newspapers Section spent \$470,279.63 and generated revenue of \$863,711.60.

4.20 Guidance relating to the management of social media is available in the policy, a Social Media Playbook released in June 2019 to support staff responsible for managing social media accounts, and a social media team standing operating procedure. Facilitation of the approval for new social media accounts and monitoring of departmental social media accounts is undertaken by MCB. An overview of engagement with Defence's four official social media accounts managed by MECC is produced weekly and monthly by the Defence News Bureau.

4.21 A handbook has been developed to provide guidance to staff who manage the development and production of the three Service newspapers and the Defence Magazine. Content for these publications can originate from the Services, Defence groups or MCB.

#### *Production and release of image and video content*

4.22 Defence produces image and video content relating to its activities for public release. Much of this material can be accessed through the Defence website. As outlined in the policy, the release of Defence photographs and audio-visual material assists in the promotion of public awareness and understanding, and support of Defence activities. Defence advised that in 2018–19, it published 485 videos and 19,766 photographs on its publicly available video and image galleries. In 2019–20, 186 videos and 13,733 photographs have been published as at December 2019. A Standard Operating Procedure for processing photographic packages has been developed to support staff undertaking these activities, as well as a checklist to support the release of digital imagery (see paragraph 4.42 for more detail).

#### **Guidance for those speaking for the department**

4.23 The previous manual indicated that a Defence spokesperson must be selected by a senior executive officer or military equivalent, be a subject matter expert, and receive public affairs support and training. The new Media and Communication Policy is more detailed and states that only personnel approved to speak to the media may do so. The policy states that Defence ministers, the Defence Secretary and Chief of the Defence Force are authorised to speak to the media and authorise specific departmental personnel to speak to the media or engage in a public affairs activity on behalf of Defence. Group heads and the service chiefs have standing authority to speak to the media, or may delegate this authority for low risk, localised community engagement activities.

4.24 At times, Defence is required to undertake communications activities at short notice and provide information to the public without being able to proactively plan the messaging. In February 2019, following a flooding event in northern Queensland, a state of natural disaster was announced by the Queensland Government. A request for direct support to civilian emergency efforts was made by the Queensland Government to the Australian Defence Force. In response, Joint Task Force 658 was established to support the Queensland and local government response. A second task force (Joint Task Force 646) was also established to provide support to farming areas in north western Queensland affected by the floods. The communication activities undertaken by Defence in relation to the Townsville floods in February 2019 are outlined in Case study 2.



## Case study 2. Defence support to Townsville floods in February 2019

The Defence Communication Manual (which was in force at the time) provided guidance for use of social media during a crisis, as part of a suite of tools to facilitate direct, authoritative and immediate communication. The purpose of Defence communication during a crisis — for example where Defence has been asked to assist and where there are risks of loss of life or damage to property — is the timely release of reliable, approved information to inform the public.

The manual required that Defence's media and communications function be prepared for crisis response by ensuring that multiple persons are trained for crisis communications and by establishing clearance plans in advance for use in a crisis. Defence advised the ANAO that this sort of staff development is undertaken 'on the job' by executive level staff. A decision matrix is available to assist social media responses to incidents.

Defence undertook a range of communication activities during the Townsville floods, including:

- preparation of communication packs for Defence personnel that included communication synchronisation requirements, key messages and talking points;
- contribution to whole-of-government key messages and talking points;
- contribution to media releases from the offices of the Prime Minister and Premier of Queensland;
- preparation of media releases, media alerts and articles to be distributed to news outlets and published on Defence social media platforms;
- publication of information and images on Defence social media and the Defence website;
- responses to media requests; and
- generation and clearance of image content for use across media platforms.

Defence advised the ANAO that the communications approach worked well, in part due to Defence's established presence in Townsville and its understanding of that community, and the community's familiarity with Defence. Defence also found that it was beneficial to have skilled communications personnel already in location, due to Defence's presence in the community prior to the crisis occurring.

Defence further advised that it altered its workflow to facilitate timely and accurate communication, by making use of mobile technology and allowing face-to-face approvals. Defence advised that the rapid clearance and approvals process enabled images and accompanying messages to be posted to social media within a few hours of being taken, as well as prompt responses to media requests. Defence acknowledged that this approach did not result in appropriate documentation of approvals, and is considering mechanisms to address this issue in future operations.

## Training

4.25 To assist staff who may be required to interact with the media, Defence provides the following media training<sup>68</sup>:

- Defence Media Awareness and Skills Course — focuses on the development of media skills, with an emphasis on television and radio interview techniques.
- Defence Media Awareness and Writing Course — focuses on developing skills in preparing written public affairs material and responding to media enquiries. As at 26 August 2019 there have been no completions since October 2016.
- VIP Media Training — offered to senior Defence military and civilian personnel. The course involves preparation for upcoming media engagements, with simulated interviews.
- Defence Public Affairs Training Course — designed for all military ranks. The course focusses on the development of key skills and knowledge areas that are linked to the pre-determined Military Public Affairs Officer core competencies.

4.26 Table 4.3 below sets out the number of Defence staff completing these courses for the period 1 January 2017 to 30 June 2019.

**Table 4.3: Media training completion (January 2017 to June 2019)**

| Course                             | Civilian | Navy | Army | Air Force | Total |
|------------------------------------|----------|------|------|-----------|-------|
| Defence Media Awareness and Skills | 99       | 21   | 35   | 25        | 180   |
| VIP Media Training                 | 0        | 4    | 4    | 0         | 8     |
| Defence Public Affairs             | 3        | 13   | 34   | 98        | 148   |

Source: ANAO analysis of Department of Defence training data.

## Managing behaviours

### *Impartiality*

4.27 Defence's Australian Public Service (APS) staff are bound by the APS Values and Code of Conduct. The Australian Public Service Commission's guidance on the application of the APS Values and code notes that APS employees are required to be impartial, and that employees who are required to engage with the media, or publicly explain government policy as part of their official duties, should ensure that their conduct supports the need to act impartially.

4.28 The Navy, Army and Air Force each have statements of values. The Military Personnel Policy Manual (MILPERSMAN) also emphasises the requirement for non-partisanship of ADF members and states that 'Defence members are to be apolitical in the performance of their duties'.<sup>69</sup>

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68 The training is delivered by media training consultants with the exception of the Defence Public Affairs Training Course which is delivered by instructional staff from the Vice Chief of the Defence Force Group's Training and Preparedness Branch.

69 Department of Defence, *Military Personnel Policy Manual*, p. 5-1.

4.29 In relation to public information and awareness campaigns<sup>70</sup>, the Defence Communication Manual stated that Defence ‘has a responsibility to effectively explain the implementation and operation of the defence policies and programs of the Australian Government of the day in an impartial and professional manner’.<sup>71</sup> The manual also outlined some relevant legislation and related documents<sup>72</sup> that should be read in conjunction with guidance in the manual on information and awareness campaigns, and provided some brief guidance on how these campaigns may work in practice.

4.30 The manual also outlined methods that Defence could use to help explain how new or ongoing government policies and programs are expected to work, including through: proactively pursuing media opportunities; authorised spokespersons responding to media enquiries; developing content for social media; and appearing at parliamentary committees. The manual described some risks relating to the participation of Defence personnel in advertising campaigns, as well as outlining some of the differences between information and advocacy.

4.31 Similar to the manual, the July 2019 Media and Communication Policy provides guidance that media and communications activities should be undertaken in an impartial, transparent and professional manner and includes references to other relevant legislation and documents that should be read in conjunction with the policy. While the policy references the APS Values and Code of Conduct, it does not explicitly elaborate on the implications of the Code or Values in the context of undertaking public communications and media activities. The manual did, in some instances, note that neutral language should be used, for example when correcting the record.

4.32 Both the manual and the policy note the role of communications and media activities in promoting Defence. The manual described the role of Defence communications and public affairs as assisting to ‘promote Defence as a capable, transparent and accountable organisation and for delivering a consistent internal message.’<sup>73</sup> The policy states that it ‘provides a framework that helps Defence promote and support the policy agenda of the Government of the day’ and ‘enables appropriate, quality engagement with the media and the public and seeks to shape the narrative of Defence’.<sup>74</sup>

4.33 ADF and APS personnel may be called on to support ministers in their public communications activities, which may include appearing with ministers in public and at media events. Neither the manual nor the policy provide advice on protocols for preserving public confidence and perceptions of APS and ADF impartiality where overtly political issues arise. The importance of such protocols was demonstrated at a press conference held by the Minister for Defence in March 2019 at which ADF and APS personnel were present (case study 3 below).

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70 The manual noted that “public awareness involves explaining government policy, while government policy publicity campaigns, which often involve advertising, are considered to be ‘public information’”. Department of Defence, *Defence Communication Manual*, 16 December 2016, p. 10-1.

71 Department of Defence, *Defence Communication Manual*, 16 December 2016, p. 10-1.

72 These are: Statement of Ministerial Standards version 4.3; Supporting Ministers — upholding the Values; *Public Service Act 1999*; and MILPERSMAN — Part 7, Chapter 1 Political Activities of Defence members. The Manual also lists 28 other pieces of legislation and policy related to the conduct of Defence public communications activities.

73 Department of Defence, *Defence Communication Manual*, 16 December 2016, p. 1-1.

74 Department of Defence, *Defence Media and Communication Policy*, 15 July 2019, p. 6.

### Case study 3. Actions by CDF to protect Defence's impartiality

On 28 March 2019, a media conference was held by the Minister for Defence to announce changes to the senior military leadership following the retirement of the Chief of Air Force. Following the announcement, the media asked the Defence Minister questions relating to federal politics, while senior ADF and APS personnel were left standing behind and alongside the minister. The Chief of the Defence Force intervened to ask the minister that the military officers step aside while the minister was answering these kinds of questions. The ADF and APS members present took this as a signal to step away from the media conference.

4.34 There would be benefit in the Defence Media and Communication Policy or related toolkit including guidance on such matters, so that Defence's management of such situations does not rely exclusively on the experience of individual personnel.

#### *Registering media contacts*

4.35 Accountable authorities are responsible for information released by their entity and for establishing expectations for personnel who may release information on behalf of an entity, subject to any legal requirements relating to the disclosure of official information.

4.36 In July 2018, an internal review commissioned by the Secretary and Chief of the Defence Force was undertaken to consider the effectiveness of Defence's security controls on classified and official information across Defence, as well as covering the processes for interacting with external bodies, including journalists and the media. The review noted that:

A number of stakeholders expressed concerns that staff in media liaison roles lack the judgement or strategic awareness to recognise media interests and practices. And despite formal media engagement systems and controls, there is a lack of transparency and consistency across Defence in approaches to media engagement.

Security investigations continue to find that Defence staff in media-facing roles engage with journalists outside established systems, with no recording or reporting of that engagement and without regard to broader Defence processes or expectations.<sup>75</sup>

4.37 The review made 16 recommendations, including the establishment of a register to record personal and professional contact between Defence personnel and the media. In October 2018, the Defence Media Contact Register was established for personnel (ADF, APS and contractors) to record all interactions with journalists and the media. A quick reference guide was also developed to support use of the register. It provides instructions on how to register a contact and includes a frequently asked questions section.

4.38 As at 16 September 2019, 193 contacts were registered. Guidance on use of the register and recording all contact with journalists does not exclude MECC, or contact with journalists as part of managing media enquiries. Register entries mainly relate to media contacting members of Defence requesting information on specific issues/stories and introductory meetings between journalists and the newly appointed MCB Assistant Secretary. Defence advised the ANAO that the register is not routinely monitored.

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75 Department of Defence, *Review of the Implementation and Assurance of Defence Security Policy and Controls*, 2 July 2018, p. 15.

4.39 The review also recommended that a Defence media code of conduct be developed to govern staff engagement with the media and to provide clear expectations around how staff interact with the media. Defence advised the ANAO that a media code of conduct was not established as the newly released policy contains guidance that staff must record all interactions with the media in the register, and failure to do so may result in administrative or disciplinary action. While this approach focuses on staff being transparent in their contact with the media, it does not address the issues raised in the review about providing clear guidance on the types of behaviours staff should exhibit or be aware of when engaging with the media.<sup>76</sup>

### **Consideration of operational security, security of personnel and classified information**

4.40 The manual stated that when commenting publicly or to the media, Defence personnel:

... must only reveal information which they are authorised to release and:

- a. is not protected by a security classification, confidentiality or privacy marking;
- b. will not compromise an individual's privacy without their prior consent;
- c. will not compromise the operational security of present or future activities or operations, and the safety of Defence personnel;
- d. will not compromise Australia's international relationships;
- e. does not outline a policy matter or major service deployment which has not been announced by government, or is not authorised for release; and
- f. does not give details of an accident or incident, beyond the confirmed fact that it has occurred and the time and place that it occurred ....<sup>77</sup>

4.41 The new policy is less detailed, stating that information must be cleared prior to release and that its release 'must be balanced with the imperative to protect operational security, the safety of personnel and their families, international relationships, as well as classified and private information.'<sup>78</sup> Defence advised the ANAO in October 2019 that information regarding the protection of operational security and classified information will be added to the Communications Toolkit.

4.42 Within MCB, the area responsible for Defence imagery has developed a checklist to support the clearance of Defence images. The checklist covers issues relating to images of individuals (for example, consent to be photographed, the protection of an individual's identity, and the inclusion of minors in an image), as well as operational security considerations prior to an image being cleared for publication. There is also guidance on security and privacy considerations before posting to social media.

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76 Defence further advised the ANAO that additional guides and processes are under development to support the new policy.

77 Department of Defence, *Defence Communication Manual*, 16 December 2016, pp. 2-2 to 2-3.

78 Department of Defence, *Defence Media and Communication Policy*, 15 July 2019, p. 14

## Does Defence monitor and report on the delivery of routine activities?

Defence’s internal reporting on the delivery of routine media and communications activities is primarily focused on output measures relating to the number of media enquiries and the time taken to respond, rather than the achievement of overarching objectives. Defence has one performance measure relating to the timeliness of responses to media enquiries.

4.43 As with planned activities, there is no reporting against overarching objectives. Reporting focuses instead on output measures, such as quantity and timeliness.

4.44 In 2017 and 2018, weekly reports were provided by MCB<sup>79</sup> to the responsible Assistant Secretary. These reports included an update from each section of the branch<sup>80</sup>, outlining:

- advice that was provided to ministers;
- advice that was provided to senior Defence personnel;
- key issues for the week ahead; and
- upcoming events/activities.

4.45 The media and social media sections of the report also contained information on: the number of media enquiries finalised; the number of media releases distributed (both ministerial and departmental); the number of Defence images, portraits and videos edited and cleared to be uploaded to the Defence website; and the number of pieces of content shared or posted to social media as well as the number of ‘likes’, shares/retweets, comments and views. Defence advised the ANAO that the weekly reports were not produced after December 2018 due to duplication in other reports.

4.46 Table 4.4 shows the reporting undertaken by MECC Division in relation to its business as usual activities.

**Table 4.4: Reporting undertaken by MECC Division<sup>a</sup>**

| Name of report     | Contents of report  | Frequency of report | Recipients of report   |
|--------------------|---|---------------------|--|
| Daily News Summary | Provides an overview of top media stories involving Defence.  | Daily               | Defence wide. Report is available on Defence intranet site, and is provided by email to senior Defence leaders and staff who do not have easy access to the Defence Protected Network. |
| Today in Defence   | Provides an overview of: <ul style="list-style-type: none"> <li>• ministers, Secretary and CDF movements for that week;</li> <li>• media releases due to be released that day;</li> </ul> | Daily               | MECC Division, Army Headquarters, Regional Managers Public Affairs and Departmental Liaison Officers in ministerial offices. The report is also provided to                            |

<sup>79</sup> Prior to 2018, MCB was called the Corporate Communications Branch.

<sup>80</sup> Media section, social media section, strategic communications section, Defence news section, and from each of the regional public affairs officers for their designated region.

| Name of report                              | Contents of report  | Frequency of report  | Recipients of report   |
|---|---|--|--|
|   | <ul style="list-style-type: none"> <li>• social media posts;</li> <li>• current/emerging media issues; and</li> <li>• information on the media enquiries that were finalised the previous day.</li> </ul>   |  | communications staff at the Department of Veterans Affairs and the Department of Foreign Affairs and Trade.  |
| AM/PM Status                                | Provides an overview of all active media enquiries and their status, as well as highlighting the responses due back to MECC that day.   | Twice daily (AM and PM)  | Ministerial media advisers.  |
| Weekly Timeliness Report <sup>b</sup>       | Outlines the number of media enquiries sent by MECC to the groups and services, and of those, the number of enquiries that were returned to MECC by the requested time and the number returned overdue. The report also outlines the number of media enquiries sent by MECC to ministerial offices for clearance, and the number returned on time or overdue to the journalist. | Weekly   | Defence senior leadership group.   |
| Entertainment Request Update <sup>c</sup>   | Provides updates on active/approved/declined entertainment requests.  | Weekly   | Assistant Secretary MCB.   |
| Daily Ministerial Talking Points            | Provides talking points for ministers on emerging and current Defence related issues.   | Daily  | Ministerial media advisers.  |
| Poly-fluoroalkyl substance (PFAS) reporting | <p>PFAS Media Reporting — includes PFAS articles relating to Defence and others.</p> <p>PFAS Media Enquiry Report — summarises the previous month's media and ministerial items developed by MCB.</p>   | <p>PFAS Media Reporting — daily</p> <p>PFAS Media Enquiry Report — monthly</p> | <p>Daily reporting is provided to representatives from the following groups/services/agencies: Defence Estate and Infrastructure Group, Associate Secretary, Navy, Army, Air Force, and Joint Capabilities Group. The report is also provided to representatives from the Department of Human Services.</p> <p>The PFAS Media Enquiry Report is also provided to the Defence Program Governance Board as part of a larger program management report.</p> |
| Department of Defence Daily Social          | Provides an overview of Defence related social media in the previous 24 hours.  | Monday to Thursday   | Defence ministerial media advisers, executive staff and/or strategic   |

| Name of report                         | Contents of report  | Frequency of report | Recipients of report   |
|--|---|---------------------|--|
| Media analysis <sup>d</sup>            |   |                     | communication advisors for the: Secretary, Chief of the Defence Force, Vice Chief of the Defence Force, Associate Secretary, Australian Signals Directorate, Australian Defence Force Headquarters, Services' Headquarters, and MECC Division. It is also provided to Headquarters Joint Operations Command military public affairs personnel. |
| Social Media Daily Talking Points Scan | Provides an overview of social media activity on topical issues relevant to Defence.  | Daily               | Defence ministerial media advisers, executive staff and/or strategic communication advisors for the: Secretary, Chief of the Defence Force, Vice Chief of the Defence Force, Associate Secretary, Services' Headquarters, MECC Division, International Policy Division, and Defence Industry Policy Division.                                  |
| Post-event reports                     | Provides an overview of social media engagement generated for significant activities, for example, Defence Exercises or corporate events. | As required.        | Provided to line areas responsible for the related communication plans for circulation among their stakeholders.   |

Note a: In addition to the reports listed in Table 4.4, MECC produces a weekly US Force Posture Initiatives report that provides an overview of social media engagement relevant to the US Force Posture Initiatives. Additionally, the Pacific Step-Up report is produced monthly and provides an overview of social media engagement relevant to the Defence component of the Australian Government's Pacific Step-Up.

Note b: This report was previously called the Defence Weekly Report. These reports are also discussed in Table 2.1.

Note c: Entertainment requests are requests for Defence's involvement in a range of activities including: films; television and/or radio programs; documentaries; books; corporate videos; and community service announcements.

Note d: This report is provided by an external provider. In December 2019, Defence advised the ANAO that the provider changed on 30 November 2019 and this report has been replaced by the daily Defence Social Media Report.

Source: ANAO analysis of Department of Defence information.

4.47 The manual also noted that all interviews, public speeches, presentations, events (including media conferences), and newspaper contributions should be included in the Defence Events and Speeches Report (the DES).<sup>81</sup> The DES/Tracker is an online database that staff can access to record internal and external events and activities.<sup>82</sup> A weekly report, based on information in the

81 This has been replaced by the Defence Activity and Engagement Tracker. The Tracker is administered by the Defence Media team.

82 Includes speeches, meetings, conferences, Australian Defence Force exercises, and visits.



DES/Tracker, is produced for senior Defence leaders and ministers to provide visibility of all current and future departmental activities and media opportunities (this is discussed in Table 2.1).

### *Performance information*

4.48 Defence advised the ANAO that prior to the release of MECC's 2019–20 Business Plan there was no departmental key performance indicator for timeliness of responses to journalists or media outlets, although Defence had measured the number of responses that were provided within the journalist's or media outlet's timeframe.<sup>83</sup> These measurements are set out in Table 4.5 below.

**Table 4.5: Responses to media enquiries provided after requested date for response**

|  | 2017 <sup>a</sup> | 2018  | 2019 <sup>b</sup> |
|--|-------------------|-------|-------------------|
| Total enquiries received   | 1,090             | 2,464 | 1,202             |
| Number of enquiries responded to   | 957               | 2,310 | 1,161             |
| Number of enquiries responded to that were provided after the journalist's requested date for response         | 591               | 899   | 267               |
| Percentage of enquiries responded to that were provided after the journalist's requested date for response (%) | 61.7%             | 38.9% | 23%               |

Note a: Defence advised that prior to March 2017, media enquiries were managed through another ICT system which is no longer available.

Note b: As at 30 September 2019.

Source: Department of Defence data.

4.49 As shown in Table 4.5, in 2018 — the only year for which a full year's data was available — Defence responded to around 39 per cent of media enquiries after the requested date for a response. Defence advised the ANAO in August 2019 that the most common reasons for an enquiry not being responded to were: the enquiry was dealt with via telephone; the journalist no longer required a response; or the response was handled by a minister's office.

4.50 MECC's 2019–20 Business Plan notes a target of 85 per cent for media timeliness requirements to meet the business plan priority of implementing the Minister's direction on media. However, the business plan does not detail what the requirement to be met is.<sup>84</sup> Defence advised the ANAO that, with the implementation of the new triage matrix for media enquiries in July 2019, Defence will now monitor the achievement of the measure of a three hour response time for priority one enquiries. Defence commenced reporting on this KPI in August 2019.

4.51 Defence also advised the ANAO that a new reporting spreadsheet would be implemented from August 2019 to enable the department to collect more detailed information on:

- journalists or media outlets submitting enquiries, including on the number of enquiries, and issues being written about;
- handling times for enquiries at various points in the process; and
- the sentiment, complexity and use of the response.

83 As discussed in earlier in this chapter, until July 2019 Defence did not triage requests or differentiate between media enquiries and requests for interviews.

84 Defence advised the ANAO that the 85 per cent target is related to timeliness for responses to media enquiries.

4.52 In December 2019 Defence advised the ANAO that as at November 2019, implementation was mostly complete, with the department still determining how to best capture the sentiment of the response.

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Grant Hehir  
Auditor-General

Canberra ACT  
28 January 2020

# Appendices

## Appendix 1 Department of Defence response



**Australian Government**

**Department of Defence**

**PO Box 7900 CANBERRA BC ACT 2610**

EC19-006217

**Mr Grant Hehir**  
Auditor-General  
PO BOX 707  
CANBERRA ACT 2601

Dear Mr Hehir

**Australian National Audit Office Section 19 Proposed Report: Defence's Management of its Public Communications and Media Activities**

Thank you for your correspondence of 21 November 2019, which contained the Proposed Report for the *ANAO performance audit – Defence's Management of its Public Communications and Media Activities*. Defence appreciates the opportunity to review and comment on the Proposed Report.

Defence welcomes the findings contained in the audit report on *Defence's Management of its Public Communications and Media Activities* and agrees with the recommendations.

Defence has undertaken significant reform of its media and communication function, with the majority of this change implemented during 2018-19. This has delivered a shared services arrangement that better supports the Department and our Ministers. Embedding a reform program of this size requires time, however Defence has already seen improvements in the efficiency and effectiveness of its communication processes, which is expected to continue during the next six months as processes are further implemented and refined.

Defence introduced a Media and Communication Policy in July 2019, which replaced the Defence Communication Manual 2016. The policy provides a governance framework for communication and procedural guidance to support Defence's public communications and engagement with the media, including approval processes for the release of public information. Defence will update its Media and Communication Policy to define the activities that require communication plans and clearly articulate the requirement for formal evaluation of communication plans.

There will always be room to improve. Defence is confident it is on track to continually enhance its media and communication services to provide a coordinated and consistent voice to Government, the media, Defence industry, members of the public and employees, and manage risk and accountability.

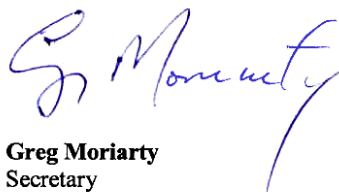
Attached to this letter are Defence's Proposed Amendments, Editorials and Comments (Annex A), Defence's Response to Requests for Information (Annex B), Defence's Response to the Proposed Recommendation (Annex C), and the Defence Summary Response (Annex D). These constitute Defence's formal response to the Proposed Report.

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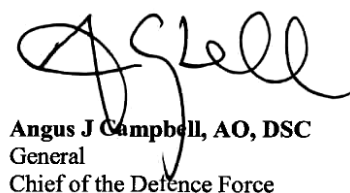
Our point of contact is ANAO Liaison Officer, Ms Alaina Garcia, who can be contacted by telephone on 02 6266 3103 or email: [alaina.garcia@defence.gov.au](mailto:alaina.garcia@defence.gov.au).

Defence remains committed to assisting you with the successful completion of this audit. We look forward to the upcoming tabling of the Final Report.

Yours sincerely



**Greg Moriarty**  
Secretary



**Angus J Campbell, AO, DSC**  
General  
Chief of the Defence Force

13 December 2019

13 December 2019

**Annexes:**

- A) Defence's Proposed Amendments, Editorials and Comments
- B) Defence's Response to Requests for Information
- C) Defence's Response to the Proposed Recommendation
- D) Defence Summary Response

## Appendix 2 Australian Government legislation and frameworks governing public service information activities

**Table A.1: Public Governance, Performance and Accountability Act 2013<sup>a</sup>**

|  |
|--|
| <p>Sections 15 to 19 of the PGPA Act impose additional duties on [accountable authorities] in relation to governing your Commonwealth entity. Each of these duties is as important as the others.</p> <p><i>Duty to govern the Commonwealth entity and duty to establish and maintain appropriate systems relating to risk management and oversight and internal controls</i></p> <p>Section 15 and section 16 of the PGPA Act require you to establish governance arrangements for your entity that clearly set out the roles, responsibilities and accountabilities of officials. These systems and processes must help officials to determine how decisions about the use or management of public resources will affect public resources generally (section 15(2) of the PGPA Act).</p> <p>An accountable authority of a non-corporate Commonwealth entity must govern their entity in a way that is not inconsistent with relevant policies of the Australian Government (section 21 of the PGPA Act).</p>   |
| <p>Section 25 to 29 of the PGPA Act set out the general duties that apply to the officials of all Commonwealth entities, particularly in their management and use of public resources.</p> <p>You must exercise your powers, perform your functions and discharge your duties:</p> <ul style="list-style-type: none"> <li>• with the degree of care and diligence that a reasonable person would exercise if the person had the same responsibilities as you</li> <li>• honestly, in good faith and for a proper purpose</li> </ul> <p>You must not improperly use your position, or information you obtain in that position, to:</p> <ul style="list-style-type: none"> <li>• gain, or seek to gain, a benefit or an advantage for yourself or any other person</li> <li>• cause, or seek to cause, detriment to your entity, the Commonwealth or any other person</li> </ul> <p>Like all officials, you must disclose material personal interests that relate to the affairs of your entity and you must meet the requirements of the finance law.</p> <p>Accountable authorities who do not comply with these general duties can be subject to sanctions, including termination of employment or appointment.</p> |

Note a: This table cites the Department of Finance's guides to the *Public Governance, Performance and Accountability Act 2013* and should be read in conjunction with the listed sections of the legislation.

Source: Department of Finance, *Guide to the PGPA Act for Secretaries, Chief Executives or Governing Boards (accountable authorities)*, December 2016 and *Resource Management Guide 203 — General duties of officials*, 2014.

**Table A.2: Public Service Act 1999**

| APS Code of Conduct  | Section |
|--|---------|
| 1. An APS employee must behave honestly and with integrity in the course of APS employment.  | 13      |
| 2. An APS employee must act with care and diligence in the course of APS employment.   |         |
| 3. An APS employee, when acting in the course of APS employment, must treat everyone with respect and courtesy, and without harassment.  |         |
| 4. An APS employee, when acting in the course of APS employment, must comply with all applicable Australian laws. For this purpose, <b>Australian law</b> means: <ol style="list-style-type: none"> <li>any Act (including this Act), or any instrument made under an Act; or</li> <li>any law of a State or Territory, including any instrument made under such a law.</li> </ol> |         |

|   |                |
|---|----------------|
| <ol style="list-style-type: none"> <li>5. An APS employee must comply with any lawful and reasonable direction given by someone in the employee's Agency who has authority to give the direction.</li> <li>6. An APS employee must maintain appropriate confidentiality about dealings that the employee has with any Minister or Minister's member of staff.</li> <li>7. An APS employee must disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with APS employment.</li> <li>8. An APS employee must use Commonwealth resources in a proper manner.</li> <li>9. An APS employee must not provide false or misleading information in response to a request for information that is made for official purposes in connection with the employee's APS employment.</li> <li>10. An APS employee must not make improper use of: <ol style="list-style-type: none"> <li>a. inside information; or</li> <li>b. the employee's duties, status, power or authority;</li> </ol> in order to gain, or seek to gain, a benefit or advantage for the employee or for any other person.</li> <li>11. An APS employee must at all times behave in a way that upholds the APS Values and the integrity and good reputation of the APS.</li> <li>12. An APS employee on duty overseas must at all times behave in a way that upholds the good reputation of Australia.</li> <li>13. An APS employee must comply with any other conduct requirement that is prescribed by the regulations.</li> </ol> |                |
| <b>Responsibilities of Secretaries</b>  | <b>Section</b> |
| <p>The responsibilities of the Secretary of a Department are as follows:</p> <ol style="list-style-type: none"> <li>a) to manage the affairs of the Department efficiently, effectively, economically and ethically;</li> <li>b) to advise the Agency Minister about matters relating to the Department;</li> <li>c) to implement measures directed at ensuring that the Department complies with the law;</li> <li>d) to provide leadership, strategic direction and a focus on results for the Department;</li> <li>e) to maintain clear lines of communication within the Agency Minister's portfolio, as negotiated between the Secretary and the other Agency Heads in the portfolio;</li> <li>f) to engage with stakeholders, particularly in relation to the core activities of the Department;</li> <li>g) to manage the affairs of the Department in a way that is not inconsistent with the policies of the Commonwealth and the interests of the APS as a whole;</li> <li>h) to ensure that the Agency Minister's portfolio has a strong strategic policy capability that can consider complex, whole-of-government issues;</li> <li>i) to assist the Agency Minister to fulfil the Agency Minister's accountability obligations to the Parliament to provide factual information, as required by the Parliament, in relation to the operation and administration of the Department;</li> <li>j) such other responsibilities as are prescribed by the regulations.</li> </ol>  | 57 (2)         |

Source: *Public Service Act 1999*.

**Table A.3: Public Service Regulations**

|  |                |
|--|----------------|
| <b>Duty not to disclose information (Act s 13)</b>   | <b>Section</b> |
| <ol style="list-style-type: none"> <li>1. This regulation is made for subsection 13(13) of the Act.</li> <li>2. This regulation does not affect other restrictions on the disclosure of information.</li> <li>3. An APS employee must not disclose information which the APS employee obtains or generates in connection with the APS employee's employment if it is reasonably</li> </ol> | 2.1            |

| Duty not to disclose information (Act s 13)  | Section |
|--|---------|
| <p>foreseeable that the disclosure could be prejudicial to the effective working of government, including the formulation or implementation of policies or programs.</p> <p>4. An APS employee must not disclose information which the APS employee obtains or generates in connection with the APS employee's employment if the information:</p> <ul style="list-style-type: none"> <li>a. was, or is to be, communicated in confidence within the government; or</li> <li>b. was received in confidence by the government from a person or persons outside the government;</li> </ul> <p>whether or not the disclosure would found an action for breach of confidence.</p> <p>5. Subregulations (3) and (4) do not prevent a disclosure of information by an APS employee if:</p> <ul style="list-style-type: none"> <li>a. the information is disclosed in the course of the APS employee's duties; or</li> <li>b. the information is disclosed in accordance with an authorisation given by an Agency Head; or</li> <li>c. the disclosure is otherwise authorised by law; or</li> <li>d. the information that is disclosed: <ul style="list-style-type: none"> <li>i. is already in the public domain as the result of a disclosure of information that is lawful under these Regulations or another law; and</li> <li>ii. can be disclosed without disclosing, expressly or by implication, other information to which subregulation (3) or (4) applies.</li> </ul> </li> </ul> <p>6. Subregulations (3) and (4) do not limit the authority of an Agency Head to give lawful and reasonable directions in relation to the disclosure of information.</p> <p>Note: Under section 70 of the <i>Crimes Act 1914</i>, it is an offence for an APS employee to publish or communicate any fact or document which comes to the employee's knowledge, or into the employee's possession, by virtue of being a Commonwealth officer, and which it is the employee's duty not to disclose.</p> |         |

Source: Public Service Regulations 1999.

**Table A.4: Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities**

| Underlying Principles   | Section |
|---|---------|
| <p>In general terms, a campaign is a planned series of communication activities that share common objectives, target the same audience and have specific timelines and a dedicated budget. An advertising campaign includes paid media placement and an information campaign does not.</p> <p>The underlying principles governing the use of public funds for all government information and advertising campaigns are that:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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; and</li> <li>c) government campaigns must not be conducted for party political purposes.</li> </ul> | 7-8     |

Source: Department of Finance, *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, 2014.



**Table A.5: Freedom of Information Act 1982**

| Objects—general  | Section |
|--|---------|
| <ol style="list-style-type: none"> <li>1. The objects of this Act are to give the Australian community access to information held by the Government of the Commonwealth, by:               <ol style="list-style-type: none"> <li>a. requiring agencies to publish the information; and</li> <li>b. providing for a right of access to documents.</li> </ol> </li> <li>2. The Parliament intends, by these objects, to promote Australia's representative democracy by contributing towards the following:               <ol style="list-style-type: none"> <li>a. increasing public participation in Government processes, with a view to promoting better-informed decision-making;</li> <li>b. increasing scrutiny, discussion, comment and review of the Government's activities.</li> </ol> </li> <li>3. The Parliament also intends, by these objects, to increase recognition that information held by the Government is to be managed for public purposes, and is a national resource.</li> <li>4. The Parliament also intends that functions and powers given by this Act are to be performed and exercised, as far as possible, to facilitate and promote public access to information, promptly and at the lowest reasonable cost.</li> </ol> | 3       |
| Right of Access  | Section |
| <ol style="list-style-type: none"> <li>1. Subject to this Act, every person has a legally enforceable right to obtain access in accordance with this Act to:               <ol style="list-style-type: none"> <li>a. a document of an agency, other than an exempt document; or</li> <li>b. an official document of a Minister, other than an exempt document.</li> </ol> </li> <li>2. Subject to this Act, a person's right of access is not affected by:               <ol style="list-style-type: none"> <li>a. any reasons the person gives for seeking access; or</li> <li>b. the agency's or Minister's belief as to what are his or her reasons for seeking access.</li> </ol> </li> </ol>  | 11      |

Source: *Freedom of Information Act 1982*.

## Appendix 3 Excerpts from stakeholder submissions to the ANAO

### Excerpts from stakeholder submissions to the ANAO

The system has built into it a very high level of risk aversion, which means some media requests are actively blocked.

Defence is a very reactionary department to deal with, with a default setting of protection.

The process (and subsequent quality) for engaging with Defence Media has ranged from woeful to passable depending on the day.

There are some good individuals in the department but collectively the 'system' and bureaucracy is suffocating.

Other countries are much more forthcoming with information — if you want to know what the Australians are doing, ask the Yanks.

The vital difference seems to be this: in the U.S., personnel are trusted to use their judgement in dealing with the media because we are not regarded as the enemy. The opposite is the case here, with Defence having a culture that at times borders on absolute paranoia.

... at a time when Australia's strategic environment is deteriorating, in response to which the Government is investing more national resources into Defence ... [and] public trust in government institutions is falling ... The antidote is increased transparency and disclosure — to increase trust, build public support for the necessary Defence spending and policies, and drive improved performance of Defence as an institution. Yet Defence public communication and media practices are moving in the opposite direction — which is to the public's and the organisation's loss.

The fundamental risk calculus governing Defence public communication and media management is wrong — increased public engagement and increased openness, by more defence voices being present in public discussion is what is required given the importance of the Defence organisation's role in Australia's uncertain strategic environment.

There is a deep irony that the latest and broadest of the reviews — the First Principles Review — seems to have given the Department the tools it is now using to restrict the flow of public information on Defence released to the community and to stifle the transparency that is the best insurance against mismanagement and waste.

Whether measured by responsiveness to requests with simple restatements of existing information and policy as opposed to real data, high levels of censoring and redacting of what should be publicly available performance information, or increased obstacles in the way of engaging with Defence officials, the effect of controls now exerted on Defence members' engagement with anyone outside the organisation is to reduce and restrict the flow of information and to channel contacts through the intermediaries of Defence public communication staff. This is the opposite of the outcomes that any performance framework for Defence public communication should set.