

# **Australian Government Advertising: May 2019 to October 2021**

[Across Entities](#)

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Canberra ACT  
17 February 2022

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 across entities. The report is titled *Australian Government Advertising: May 2019 to October 2021*. 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, which appears to read 'Grant Hehir', is positioned below the 'Yours sincerely' text.

Grant Hehir  
Auditor-General

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

## **AUDITING FOR AUSTRALIA**

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

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# Audit snapshot

## Auditor-General Report No.17 2021–22

*Australian Government Advertising May 2019 to October 2021*



### Why did we do this audit?

- ▶ The objective of the audit was to assess the effectiveness of the Department of Finance's and selected entities' implementation of the Australian Government's campaign advertising framework. The audit continues the ANAO's coverage of the framework, to provide Parliament with: information on its development; campaign expenditure over time; and assurance as to whether entities have effectively implemented the framework and complied with the requirements of the campaign advertising Guidelines.



### What did we find?

- ▶ Finance has been effective in its whole-of-government administration of the campaign advertising framework. DSS and Treasury have been effective in their implementation of framework requirements for the selected campaigns. Infrastructure has been largely effective in its administration of framework requirements for the selected campaign, with shortcomings identified in respect to compliance with some elements of the overarching principles.



### Key facts

- ▶ A new communications framework and new government advertising approval and procurement arrangements were introduced during 2019–20.
- ▶ During the period May 2019 to November 2021 two campaigns were exempted from compliance with the Guidelines.



### What did we recommend?

- ▶ There was one recommendation to Finance, four recommendations to Infrastructure, one recommendation to DSS and one recommendation to Treasury, aimed at improving the framework's administration.
- ▶ Entities agreed to all seven recommendations.

**\$66.1 million**

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

**\$40.9 million**

was spent on campaign development by all non-corporate Commonwealth entities in 2020–21 (GST exclusive).

**\$145.3 million**

was spent on media placement by all non-corporate Commonwealth entities in 2020–21 (GST exclusive).

# Summary and recommendations

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## Background

1. Successive Australian governments have maintained a framework to regulate the use of campaign advertising by selected government entities.<sup>1</sup> The overarching aim of the framework introduced in 2008 is to provide the Parliament and the community with confidence that public funds are used to meet the genuine information needs of the community.<sup>2</sup> The Australian Government periodically issues guidance for entities undertaking information and campaign advertising. The *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (the 2020 Guidelines) were released in October 2020 and state that:

The Guidelines operate on the underpinning premise that:

- a. members of the public have equal rights to access comprehensive information about government policies, programs and services which affect their entitlements, rights and obligations; and
- b. governments may legitimately use public funds to explain government policies, programs or services, to inform members of the public of their obligations, rights and entitlements, to encourage informed consideration of issues or to change behaviour.<sup>3</sup>

2. The 2020 Guidelines are a government policy<sup>4</sup> which apply to all information and advertising campaigns undertaken in Australia by entities subject to the Guidelines.<sup>5</sup> The 2020 Guidelines state that:

Government advertising and information campaigns are typically designed to support the effective delivery and implementation of Government policies, programs, assistance, initiatives and services.<sup>6</sup>

Accordingly, campaigns may seek to inform, educate or motivate a particular target audience; change levels of awareness, attitudes and behaviours in order to achieve a specific public policy

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1 The framework currently applies to non-corporate Commonwealth entities under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act). At 16 July 2021 there were 98 non-corporate Commonwealth entities out of a total of 187 Commonwealth entities and companies. Finance, *Flipchart of PGPA Act Commonwealth entities and companies*, 16 July 2021 available from <https://www.finance.gov.au/sites/default/files/2021-07/Flipchart%2016%20July%202021.pdf> [accessed 2 December 2021].

2 The development and purposes of the framework introduced in 2008 were reviewed in Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, pp. 7–8 and pp. 20–22 [Internet], ANAO, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019> [accessed 12 October 2021].

3 Department of Finance, *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020, paragraph 4 [Internet], Finance, available from <https://www.finance.gov.au/government/advertising/australian-government-guidelines-information-and-advertising-campaigns-non-corporate-commonwealth-entities> [accessed 11 October 2021].

4 *ibid.*, paragraph 11. See also footnote 26 of this audit report.

5 *ibid.*, paragraph 7.

6 *ibid.*, paragraph 1.

outcome ... or to encourage engagement and dialogue on matters directly relevant to the Government's responsibilities.<sup>7</sup>

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. Information campaigns typically involve a mix of public relations or below the line activities, but do not include a paid advertising component.<sup>8</sup>

3. Entities subject to the 2020 Guidelines:

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

1. relevant to government responsibilities
2. presented in an objective, fair and accessible manner
3. objective and not directed at promoting party political interests
4. justified and undertaken in an efficient, effective and relevant manner, and
5. compliant with legal requirements and procurement policies and procedures.<sup>9</sup>

4. The Special Minister of State is responsible for the administration of the campaign advertising framework and is supported by the Department of Finance (Finance). Finance manages whole-of-government provider contracts, reports annually on expenditure, publishes the Guidelines following their approval by government, and provides further guidance and advice to entities through its website and on request from entities. Entities are responsible for the development and management of campaigns and compliance with the Guidelines.

## Rationale for undertaking the audit

5. The rationale for undertaking this audit is to provide the Parliament with: information on key developments in the Australian Government's campaign advertising framework since 2019, when the ANAO last reported on its operation<sup>10</sup>; independent assurance on whole-of-government administration of the framework by the Department of Finance; and independent assurance on selected entities' compliance with the Australian Government's guidelines and the wider framework requirements when planning and undertaking advertising campaigns.

## Audit objective and criteria

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

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7 *ibid.*, paragraph 2.

8 *ibid.*, paragraph 5. Below the line activities typically refer to communications activities that do not directly relate to the traditional advertising activities of television, newspaper and radio. For example, events, roadshows and pop-up kiosks.

9 *ibid.*, paragraph 11.

10 Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, [Internet], ANAO, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019> [accessed 12 October 2021].

7. To form a conclusion against this objective, the following high-level criteria were adopted:
  - Does the Department of Finance effectively administer the Australian Government's campaign advertising framework?
  - Were selected campaigns compliant with the Australian Government's campaign advertising framework?
8. The audit examined developments in the administration of the framework from May 2019 to October 2021. In addition, three campaigns were selected for review:
  - Phase 2 of the Building Our Future campaign, conducted from January 2019 to June 2021 and administered by the Department of Infrastructure, Transport, Regional Development and Communications (Infrastructure);
  - the Domestic Violence Support Services (Help is Here) campaign, conducted from May 2020 to January 2021 and administered by the Department of Social Services (DSS); and
  - Phases 1 and 2 of the Economic Recovery Plan campaign, administered by the Department of the Treasury (Treasury). Phase 1 was conducted from October 2020 to December 2020 and Phase 2 was scheduled from June 2021 to October 2021 but was paused on 1 July 2021 due to COVID-19 lockdown restrictions.<sup>11</sup>
9. The audit also assessed the implementation by Finance and the selected entities (where applicable) of previous ANAO audit recommendations relating to government advertising.

## Conclusion

10. Finance has been effective in its whole-of-government administration of the campaign advertising framework. DSS and the Treasury have been effective in their implementation of framework requirements for the selected campaigns. Infrastructure has been largely effective in its administration of framework requirements for the selected campaign, with shortcomings identified in respect to compliance with some elements of the overarching principles.

11. Finance has been effective in its central agency role of supporting entities, providing secretariat support to third-party reviewers (the Independent Communications Committee), preparing the annual campaign expenditure report and advising government on emerging risks, issues and framework changes including options for responding to previous ANAO performance audit recommendations.

12. Phase 2 of Infrastructure's Building Our Future campaign was subject to the necessary review, certification and publication requirements. The campaign was relevant to Australian Government responsibilities and presented in an accessible manner. Some campaign statements did not accurately represent the Australian Government's involvement in infrastructure projects. Advertising materials were free of political content, although public relations (PR) activities undertaken during Wave 1 were not consistent with advice provided to the ICC that PR activities

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11 The campaign was paused at the time the ANAO was conducting fieldwork. In October 2021 Treasury advised the ANAO that a relaunch date has not yet been established and there were no current plans to recommence advertising for this campaign. Treasury further advised that due to the extensive COVID-19 outbreaks across the country further research was required to understand the information needs of the community and business.

would not 'be instigated by any political party or politician, or make reference to any political party or politician'. A number of Wave 1 PR activities were either paid for but not delivered, or delivered in insufficient time to be used. Infrastructure did not negotiate a lower price when agreeing to a contract for a reduced range of PR services compared to the services quoted. Infrastructure demonstrated the justification for Wave 1 but not for Wave 2. The justification for Wave 3 did not take into account earlier waves' performance against campaign objectives. Each wave of phase 2 was evaluated for effectiveness. Evaluation reports for Waves 1 and 2 did not adequately address all campaign objectives. The Wave 3 evaluation report provided a clearer assessment of performance against objectives.

13. The DSS Help is Here campaign was subject to the necessary review, certification and publication requirements. The campaign was relevant to Australian Government responsibilities and was presented in an objective, fair and accessible manner. Campaign messaging was not directed at promoting party political interests. The campaign was justified and undertaken in an efficient, effective and relevant manner, although DSS did not clearly document the justification for an additional burst of advertising. DSS sought advice on compliance with legal requirements, and complied with procurement requirements for the campaign. The campaign was evaluated to determine its effectiveness.

14. The Treasury's Economic Recovery Plan campaign was subject to the necessary review, certification and publication requirements. The campaign was: relevant to Australian Government responsibilities; presented in an objective; fair and accessible manner; not directed at promoting party political interests; and justified and undertaken in an efficient, effective and relevant manner. Treasury obtained advice on compliance with legal requirements and complied with procurement requirements for both phases with the exception of two contract notices (from a total of eight) that were not reported on AusTender within 42 days as required. Phase 1 of the campaign was evaluated to determine its effectiveness. Phase 2 was not evaluated for effectiveness as the campaign was paused on 1 July 2021 due to COVID-19 lockdowns. At the time this report was prepared (November 2021), the campaign remained paused.

## Supporting findings

### **Administration of the Australian Government campaign advertising framework — Finance (Chapter 2)**

#### *Documentation of components of the framework*

15. The components of the Australian Government's campaign advertising framework, including the roles and responsibilities of stakeholders and decision-makers, are documented by Finance, to assist entities conducting advertising campaigns. Finance maintains a suite of guidance documents on a clearly signposted section of its website, to assist entities' understanding of the framework. Finance has prepared draft guidance to address recent changes to the framework. There is an opportunity for Finance to clarify framework requirements relating to public relations activities. In addition, entity accountable authorities should make active decisions on whether to seek Ministerial permission for the publication of campaign related research, and Finance could usefully draw this matter to the attention of entities if approached for advice. (See paragraphs 2.2 to 2.17)

*Third party campaign review process*

16. Noting the limitation that the Independent Communications Committee's (ICC) review occurs prior to the finalisation of campaign development, the ICC review process provides effective assistance to decision-makers. (See paragraphs 2.18 to 2.35)

*Transparency in relation to expenditure on Australian Government advertising*

17. As required by the Guidelines, Finance has reported annual media placement and associated campaign development expenditure by non-corporate Commonwealth entities, for campaigns with expenditure greater than \$250,000, in its annual *Campaign Advertising by Australian Government Departments and Agencies—Report* (annual advertising expenditure report). This information is provided on a per campaign basis. Since 2018–19, Finance has included aggregated expenditure data on campaign development costs for campaigns with total expenditure greater than \$250,000. The provision of aggregated data has increased transparency in external reporting on Australian Government advertising expenditure. (See paragraphs 2.36 to 2.52)

18. Finance's contract with the Master Media Agency has been reported on AusTender, at a maximum value of approximately \$74 million (from 1 July 2018 to 30 June 2024). Finance's contracts with Independent Communications Committee (ICC) members are also reported on AusTender, at a combined maximum value of approximately \$195,000 (from 1 July 2020 to 30 June 2022). Details of expenditure relating to these activities are not included in Finance's annual campaign expenditure report. Including these details would further increase transparency in the reporting of government campaign related expenditure. (See paragraphs 2.39 to 2.52)

*Management of emerging risks and issues relating to government advertising*

19. Since 2019, Finance has effectively managed a number of risks and issues relating to the government advertising framework, including implementation of a new communications framework and associated changes to approval and procurement arrangements. There would be benefit in Finance evaluating the impact and effectiveness of the framework changes to assess whether the intended benefits have been achieved. There is also an opportunity to maximise the value of Finance's mandated evaluation process to further improve measures of campaign effectiveness. (See paragraphs 2.53 to 2.92)

**Building Our Future (BOF) campaign — Infrastructure (Chapter 3)***Review, certification and publication requirements*

20. The BOF Phase 2 campaign was subject to the necessary review, certification and publication requirements. Infrastructure did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. Advice to the Secretary did not include documented verification of campaign statements for Waves 1 and 2, but did for Wave 3. The Independent Communications Committee (ICC) reviewed the three Waves of the campaign and the Secretary made the necessary certifications. (See paragraphs 3.10 to 3.20)

*Adherence to the principles of the framework*

21. The BOF Phase 2 campaign complied with Principle 1 of the Guidelines and largely complied with Principles 2, 3, 4 and 5. (See paragraphs 3.21 to 3.82)

22. The campaign was relevant to government responsibilities and was presented in an accessible manner. (See paragraphs 3.21 to 3.32)

23. Campaign materials were not always presented in an objective and fair manner, with some campaign statements not accurately representing the Australian Government's level of involvement in some projects featured in advertising materials. (See paragraphs 3.23 to 3.32)

24. Advertising materials were free of political content. Public relations activities undertaken during Wave 1 were not consistent with advice provided to the ICC concerning instigation by, and references to, parliamentarians. Infrastructure did not undertake an assessment of whether the Wave 1 public relations activities were compliant with the Guidelines. (See paragraphs 3.33 to 3.44)

25. Infrastructure adequately demonstrated its justification for Wave 1 but did not adequately demonstrate its justification for Wave 2. The justification for Wave 3 did not take into account the performance against campaign objectives in the earlier waves. There was no long-term communications strategy for the Infrastructure Investment Pipeline or targets for performance against the campaign objectives. (See paragraphs 3.45 to 3.61)

26. Infrastructure did not negotiate a lower price for Wave 1 public relations despite agreeing to a contract for a reduced range of services compared to the services quoted. A number of public relations activities in Wave 1 were either paid for but not delivered, or delivered in insufficient time to be used. (See paragraphs 3.64 to 3.79)

27. In Waves 1 and 2 there was no documented analysis to support advice provided to the Secretary that 'the campaign complied with all relevant laws, and all procurement policies and procedures for the tendering and commissioning of services.' Infrastructure did not document value for money assessments for three of 14 procurements and did not report three of 14 contracts correctly on AusTender. (See paragraphs 3.80 to 3.82)

### *Campaign evaluation*

28. Infrastructure benchmarked, monitored and evaluated each wave of the campaign. Evaluation reports after Wave 1 and Wave 2 did not adequately address all campaign objectives so Infrastructure has not been able to clearly demonstrate the campaign objectives were met for those waves. The Wave 3 evaluation report provided a clearer assessment of performance against the revised campaign objectives. Infrastructure adopted some of the recommendations made in evaluation reports from Wave 1 and Wave 2. (See paragraphs 3.83 to 3.94)

## **Domestic Violence Support Services (Help is Here) campaign — DSS (Chapter 4)**

### *Review, certification and publication requirements*

29. The Help is Here campaign was subject to the necessary review, certification and publication requirements. DSS did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. The Independent Communications Committee (ICC) reviewed the two waves. The Secretary's certification was aided by a briefing pack which included ICC compliance advice and departmental advice on compliance with legal requirements. (See paragraphs 4.11 to 4.19)



*Adherence to the principles of the framework*

30. DSS adhered to Principles 1, 2, 3 and 5 of the Guidelines and largely adhered to Principle 4. (See paragraphs 4.20 to 4.41)

31. The campaign was relevant to government responsibilities and was presented in an objective, fair and accessible manner. Campaign messaging was not directed at promoting party political interests. The campaign was justified and undertaken in an efficient, effective and relevant manner, although DSS did not clearly document the justification for an additional burst of advertising conducted during the 2020–21 holiday period. DSS followed the master media agency's advice concerning media placement, sought advice on compliance with legal requirements, and complied with procurement requirements for the campaign. (See paragraphs 4.20 to 4.41)

*Campaign evaluation*

32. Help is Here was evaluated to determine its effectiveness. The evaluation indicated that the campaign was effective in raising awareness of available domestic violence support services. (See paragraphs 4.42 to 4.47)

33. The Media Performance Report reported against most key performance indicators identified at the beginning of the campaign. DSS monitored week to week changes in attitudes toward domestic violence and knowledge of domestic violence support services available for the duration of Wave 1 and conducted monthly tracking for Wave 2. DSS also monitored contact rates to key support services, 1800RESPECT and MensLine Australia. (See paragraphs 4.50 to 4.53)

**Economic Recovery Plan (ERP) campaign — Treasury (Chapter 5)***Review, certification and publication requirements*

34. The ERP campaign was subject to the necessary review, certification and publication requirements. Treasury did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. The Independent Communications Committee (ICC) reviewed the two phases of the campaign. Documented verification of campaign statements was completed for both phases but only included in the Secretary's briefing pack for Phase 2. The certification by the Secretary was not provided to the Minister for either phase as required by the Guidelines, however documentation provided to the Minister for each phase advised that the Secretary had signed the certification statement. (See paragraphs 5.10 to 5.20)

*Adherence to the principles of the framework*

35. Treasury adhered to Principles 1 to 4 of the Guidelines and complied with Principle 5, with the exception of two contract notices (from a total of eight) that were not reported on AusTender within 42 days as required. (See paragraphs 5.21 to 5.46)

36. The campaign was: relevant to government responsibilities; presented in an objective; fair and accessible manner; not directed at promoting party political interests; and was justified and undertaken in an efficient, effective and relevant manner. Treasury obtained advice on compliance with legal requirements. (See paragraphs 5.21 to 5.46)

## *Campaign evaluation*

37. Phase 1 of the ERP campaign was evaluated to determine its effectiveness, consistent with the whole-of-government campaign evaluation process conducted by Hall & Partners. The evaluation identified that the campaign reached around one third of the general public and two fifths of business audiences, but there were no increases in overall public or business awareness or understanding, or changes in attitudes and behaviours, which were the two campaign factors monitored and evaluated by Hall & Partners. Weekly monitoring of campaign impact and the evaluation of campaign outcomes were assessed using pre-campaign benchmarks of: awareness and understanding; and attitudes and behaviours measured against the campaign objectives. At the end of audit fieldwork (October 2021), Phase 2 of the campaign was paused due to COVID-19 lockdown restrictions and therefore Phase 2 has not been evaluated to determine its effectiveness. (See paragraphs 5.47 to 5.58)

## Recommendations

**Recommendation no. 1**  
**Paragraph 2.13** The Department of Finance clarify the application of certification requirements for public relations activities under the 2020 *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*.

**Department of Finance response:** *Agreed.*

**Recommendation no. 2**  
**Paragraph 3.28** The Department of Infrastructure, Transport, Regional Development and Communications ensure all future communications that refer to Australian Government-funded infrastructure projects accurately describe the Australian Government's role in the projects.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

**Recommendation no. 3**  
**Paragraph 3.59** When considering whether to continue an existing campaign, the Department of Infrastructure, Transport, Regional Development and Communications: assess the campaign's performance against its objectives; assess whether continuing a campaign represents proper use of taxpayer resources; and document the reasons for continuing the campaign.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

**Recommendation no. 4**  
**Paragraph 3.62**

The Department of Infrastructure, Transport, Regional Development and Communications develop a long-term communications strategy for the Infrastructure Investment Pipeline. The communications strategy should include communication objectives and performance targets aligned to each objective and reference the communication methods that have been assessed as most effectively addressing the specified communications goals.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

**Recommendation no. 5**  
**Paragraph 3.88**

The Department of Infrastructure, Transport, Regional Development and Communications ensure all campaign communication objectives are measurable and establish performance targets and report against them as part of campaign evaluation.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

**Recommendation no. 6**  
**Paragraph 4.48**

The Department of Social Services ensure that all campaign communication objectives are measurable and establish performance targets and report against them as part of campaign evaluation.

**Department of Social Services response:** *Agreed.*

**Recommendation no. 7**  
**Paragraph 5.59**

The Department of the Treasury establish performance targets and report against them as part of campaign evaluation.

**Department of the Treasury response:** *Agreed.*

## Summary of entity responses

38. Summary responses (where provided) from the audited departments are provided below, with full responses from all audited entities included in Appendix 1. An extract of the draft report was also provided to the Independent Communications Committee.

### Department of Infrastructure, Transport, Regional Development and Communications

The Department of Infrastructure, Transport, Regional Development and Communications (the Department) welcomes the ANAO report and agrees with the recommendations.

The Department acknowledges that there are learnings to be made from past campaign administration to ensure communications adhere more strongly to the *Guidelines on Information and Advertising Campaigns by non-Corporate Commonwealth Entities* (the Guidelines).

Over the course of the multi-phased *Building Our Future* campaign, the Department has reviewed and improved campaign procedures and guidance. As the ANAO report notes, by Wave 3 of the campaign, the Department:

- provided a more extensive briefing to support certification
- ensured the evaluation report provided a clearer assessment of performance against the campaign objectives
- ensured public relations activities were delivered in line with Principle 3 of the Guidelines
- presented campaign information in the Annual Report in accordance with requirements set out in the PGPA Rule.

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

## Department of Social Services

The Department of Social Services (the department) welcomes the Australian National Audit Office's report on Australian Government Advertising: May 2019 to October 2021 (the Report).

The department supports the conclusion that it has been effective in its implementation of framework requirements for the "Help is Here" campaign.

The department acknowledges the recommendation identified in the Report and will work with relevant entities to ensure future campaign communication objectives are measurable and where possible set performance targets based on available data.

The department notes there is opportunity to continue to strengthen our campaign certification process, and while the briefings provided to the former Secretary did not include line by line verification of each of the campaign statements, it did meet all relevant requirements of the Guidelines.

## Department of the Treasury

The Department of Treasury welcomes the report and the finding that Treasury has been effective in its implementation of framework requirements for the selected campaign. Treasury agrees with the recommendation for Treasury made in the report, noting that Treasury undertakes campaign evaluation within the Whole-of-Government Evaluation Framework. Treasury will actively participate in any review of the Whole-of-Government Evaluation Framework.

Treasury notes the administrative issues identified by the ANAO. Treasury is committed to continuing to strengthen our conformance with the principles of the *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*. Treasury has implemented process changes to address these administrative issues.

39. At Appendix 2, there is a summary of improvements that were observed by the ANAO during the course of the audit.

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

40. 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.

**Program design**

- As a number of Australian Government entities regularly undertake advertising campaigns, there is opportunity for less experienced entities to consult with their more experienced counterparts. There is no need to start from scratch, when insights and process refinements can be shared by those who have undertaken government advertising campaigns before.
- Entities should ensure campaigns accurately describe the Australian Government's role in the projects.

**Program implementation**

- To enhance transparency the accountable authority should make an active decision about whether to seek Ministerial permission for the publication of campaign related research for each campaign. The basis of the decision should be documented.

**Performance and impact measurement**

- To properly assess the effectiveness of government campaigns, it is necessary to establish clear and measurable performance targets and report progress against the set targets.
- Where campaigns or campaign phases are repeated, it is necessary to assess whether continuing them represents a proper use of public resources. The reasons for continuing a campaign or campaign phase should be documented.

**Records management**

- Maintaining records of key decisions and actions taken in relation to campaign advertising supports effective administration and entity accountability.



## **Audit findings**

# 1. Background

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## Australian Government advertising framework

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

1.2 The government periodically issues guidance for entities undertaking information and campaign advertising. The most recent version — *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (the 2020 Guidelines)<sup>14</sup> — was released in October 2020 and states that:

The Guidelines operate on the underpinning premise that:

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

1.3 The 2020 Guidelines are a government policy<sup>16</sup> which apply to all information and advertising campaigns undertaken in Australia by entities subject to the Guidelines.<sup>17</sup> The 2020 Guidelines state that:

Government advertising and information campaigns are typically designed to support the effective delivery and implementation of Government policies, programs, assistance, initiatives and services.<sup>18</sup>

Accordingly, campaigns may seek to inform, educate or motivate a particular target audience; change levels of awareness, attitudes and behaviours in order to achieve a specific public policy

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12 At 16 July 2021 there were 98 non-corporate Commonwealth entities out of a total of 187 Commonwealth entities and companies.

Finance, *Flipchart of PGPA Act Commonwealth entities and companies*, 16 July 2021 available from <https://www.finance.gov.au/sites/default/files/2021-07/Flipchart%2016%20July%202021.pdf> [accessed 2 December 2021].

13 The development and purposes of the framework introduced in 2008 were reviewed in Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, pp. 7–8 and pp. 20–22.

14 This version replaced the 2014 *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*. The 2014 guidelines were in place at the time the three campaigns reviewed in this audit commenced.

15 Department of Finance, *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020, paragraph 4 [Internet], Finance, available from <https://www.finance.gov.au/government/advertising/australian-government-guidelines-information-and-advertising-campaigns-non-corporate-commonwealth-entities> [accessed 18 August 2021].

16 *ibid.*, paragraph 11. See also footnote 26 of this audit report.

17 *ibid.*, paragraph 7.

18 *ibid.*, paragraph 1.



outcome ... or to encourage engagement and dialogue on matters directly relevant to the Government's responsibilities.<sup>19</sup>

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. Information campaigns typically involve a mix of public relations or below the line activities, but do not include a paid advertising component.<sup>20</sup>

#### 1.4 Entities subject to the 2020 Guidelines:

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

1. relevant to government responsibilities
2. presented in an objective, fair and accessible manner
3. objective and not directed at promoting party political interests
4. justified and undertaken in an efficient, effective and relevant manner, and
5. compliant with legal requirements and procurement policies and procedures.<sup>21</sup>

1.5 The framework consists of multiple components intended to provide transparency in the development and implementation of government advertising and information campaigns, value for money in procurement, and the proper use of public resources. As part of the framework, the Department of Finance (Finance) has established mandatory procurement and evaluation mechanisms for entities conducting campaigns. Key components of the framework are described in Box 1 below, and the framework's procurement and evaluation arrangements are described in Box 2. When reading the framework guidance as reflected in Box 1, it is important to note the application of requirements relating to information campaigns as compared to advertising campaigns, as these may differ.

#### **Box 1: Components of the Australian Government's campaign framework**

##### **Responsibility for administration of the framework**

The Service Delivery and Coordination Committee of Cabinet (SDCC) oversees and reviews Australian Government advertising campaigns involving paid media placement with a total campaign budget of more than \$500,000 (GST inclusive).

Proposed advertising campaigns valued above \$50,000 (GST inclusive) and under \$500,000 (GST inclusive) must be reviewed by the Assistant Minister for Electoral Matters prior to their launch.

The Special Minister of State (SMOS) can exempt campaigns from complying with the Guidelines. Exemptions are discussed in paragraphs 2.32 to 2.35 of this audit report.

<sup>19</sup> *ibid.*, paragraph 2.

<sup>20</sup> *ibid.*, paragraph 5. Below the line activities typically refer to communications activities that do not directly relate to the traditional advertising activities of television, newspaper and radio. For example, events, roadshows and pop-up kiosks.

<sup>21</sup> *ibid.*, paragraph 11.

The Department of Finance (Finance) provides policy advice, whole-of-government coordination, and assistance to entities conducting campaign activities.

Finance publishes the Guidelines, which set out the five overarching principles.

Finance reports annually on advertising campaigns with expenditure greater than \$250,000 in *Campaign Advertising by Australian Government Departments and Agencies*. These reports provide, for each campaign, a short description and breakdown of expenditure by medium. The report also provides data on media placement, market research and advertising production costs.

Other Finance functions related to government advertising campaigns include:

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

### **Responsibilities of Ministers and entities conducting government campaigns**

Ministers of non-corporate Commonwealth entities are responsible for authorising an advertising campaign's development and launch.

Entities subject to the Guidelines must be able to demonstrate compliance with the five overarching principles when planning, developing and implementing publicly funded information and advertising campaigns.

An entity's Accountable Authority is required to:

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

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

### **Third-party review role**

Since early 2015 the Independent Communications Committee's (ICC) role in the campaign advertising framework has been to:

- provide compliance advice regarding Principles 1 to 4 of the Guidelines to an entity's Accountable Authority when proposing to conduct an advertising campaign where expenditure is expected to be over \$250,000;
- report, as necessary, to the responsible Minister/s on the operation of the Guidelines, including any trends or emerging issues; and

- consider and, as necessary, propose revisions to the Guidelines to responsible Minister/s.

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

The Guidelines provide that information campaigns are not subject to ICC review, or certification by the Accountable Authority, but must comply with the Guidelines. Discussion of the ICC's terms of reference and the level of assurance provided to Accountable Authorities by the ICC is discussed from paragraph 2.18 to 2.31.

### **Government review and approval of campaigns**

SDCC approves the final creative materials and media plans for campaigns.

Since July 2014, the SDCC has overseen and reviewed campaigns involving paid media placement with a total campaign budget of more than \$500,000 (inclusive of GST) in a financial year.

In August 2018, the SDCC's review process was expanded to include an evaluation stage after a campaign is completed.<sup>a</sup>

Government review and approval processes and changes to these processes introduced in April 2021 are discussed in paragraphs 1.17 and 1.18.

Note a: The responsible Minister provides a final evaluation to the SDCC, after all planned phases of the campaign have concluded. Evaluation research results will be presented in a consistent format by a single evaluation research supplier. Evaluations are to be submitted within eight weeks of the campaign concluding.

Source: Based on ANAO analysis of Finance information.

## **Box 2: Procurement and evaluation arrangements under the framework**

### **Master Media Agency (MMA)**

The Central Advertising System (CAS) is the whole-of-government procurement arrangement mandated for all campaign and non-campaign advertising undertaken by non-corporate Commonwealth entities.<sup>a</sup> The arrangement was established to consolidate expenditure and buying power to secure optimal media rates for the placement of government advertising. Following an open tender process, Finance appointed Universal McCann (UM) as the sole supplier Master Media Agency (MMA) for the period 1 July 2018 to 30 June 2021.<sup>b</sup> The contract end date was extended in April 2021, to 30 June 2024. As at 21 September 2021 the value of the MMA contract as reported on AusTender was approximately \$74.4 million. The MMA utilises UM Central, an online management system, which entities use to brief UM on their advertising requirements. The Government Advertising GovTeams Community<sup>c</sup> enables entities to access information on the CAS, including the Deed of standing offer with UM.

### **Campaign Advertising Supplier Register (CASR)**

The CASR was the mandated procurement mechanism established by Finance for campaign activity undertaken by non-corporate entities above the value of \$250,000. The CASR was a multi-use list<sup>d</sup> which comprised five categories of communications suppliers: advertising; market and social research; public relations; specialists in communicating with Indigenous Australians; and specialists in multicultural marketing. The CASR was replaced in March 2021 by the Government Communications Campaign Panel.

### **Government Communications Campaign Panel (GCCP)**

The GCCP is the mandated whole-of-government panel arrangement established by Finance in 2020 following a limited tender approach to selected suppliers listed on the CASR. The GCCP lists 20 suppliers, each of which has a specific professional and content area in which it can operate which is aligned to the six pre-determined government priorities. From March 2021 the GCCP replaced the CASR as the procurement mechanism for campaigns with a value above \$500,000.

### **Whole of Australian Government campaign evaluation framework**

Effective 1 July 2018, following a limited tender process Finance established a single provider deed of standing offer with Hall & Partners to provide standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 per financial year. Prior to July 2018, evaluation was non-standardised and conducted by the entities undertaking the campaigns. Finance estimates that for the first three years of the arrangement, Hall & Partners provided campaign evaluation services to the value of approximately \$10.2 million.

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

Note b: Finance records indicate the arrangement was established to optimise discounts for media rates by: consolidating government advertising expenditure and buying power; incorporating media planning placement and industry expertise to government advertising activities; reducing entities' procurement costs by avoiding the need for individual entities to establish and manage their own media procurement processes; and drive efficiencies by using advertising data to inform government decisions.

Note c: GovTeams is an Australian Government collaboration tool designed for use by departments to share documents and information with stakeholders.

Note d: The CASR was a continuously open, whole-of-government multi-use list (MUL) of suppliers. A MUL is a list of suppliers who have applied for inclusion on the list and satisfied a set of conditions for participation. The process of establishing a MUL does not involve the assessment of value for money.

Source: ANAO analysis of Finance documentation.

## **Key framework developments**

1.6 The ANAO last reviewed the framework in 2019 (2019 audit).<sup>22</sup> Key developments since then have been:

- release of the 2020 Guidelines, which replaced the 2014 Guidelines;
- a new communications framework and strategic themes for government campaigns;
- new approval arrangements; and
- revised procurement arrangements for engaging suppliers, which replaced the Campaign Advertising Supplier Register (CASR) with the Government Communications Campaign Panel (GCCP).

1.7 These changes are discussed in paragraphs 1.8–1.24.

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22 Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019>.

## Revised Guidelines

1.8 When the principles-based Guidelines were first launched in July 2008, the Special Minister of State and the Finance Minister stated that their purpose was to ‘give the public confidence that campaigns are legitimately authorised, properly targeted and non-political’.<sup>23</sup> In particular, the required certification processes of the Guidelines were intended to ‘ensure Government advertising and information campaigns provide objective, factual and explanatory information, free from partisan promotion of government policy and political argument’.<sup>24</sup>

1.9 In the 2019 audit, the ANAO observed that while the Guidelines had been amended over time, the key overarching principles had remained broadly consistent since 2008. The 2019 audit also observed that the 2014 Guidelines could be perceived as largely discretionary as only Principle 5 was clearly mandated.<sup>25</sup> This had been the case since the introduction of the Guidelines in 2008. The 2019 audit included a recommendation to strengthen the Guidelines by making it clear that compliance with principles 1 to 4 was mandatory.

1.10 The government agreed to amend the Guidelines in September 2020 and Finance published updated Guidelines in October 2020. Paragraph 11 of the 2020 Guidelines states that they are a government policy<sup>26</sup> and that entities subject to the Guidelines ‘must’ be able to demonstrate compliance with the five principles. The changes are summarised in Table 1.1 below.

**Table 1.1: Changes to the principles — 2014 Guidelines compared to 2020 Guidelines**

2014 Guidelines	2020 Guidelines
<ol style="list-style-type: none"> <li>1. Campaigns should be relevant to government responsibilities.</li> <li>2. Campaigns should be presented in an objective, fair and accessible manner and be designed to meet the objectives of the campaign.</li> <li>3. Campaigns should be objective and not directed at promoting party political interests.</li> <li>4. Campaigns should be justified and undertaken in an efficient, effective and relevant manner.</li> <li>5. Campaigns must comply with legal requirements and procurement policies and procedures.</li> </ol>	<p>Entities subject to the Guidelines must be able to demonstrate compliance with the five overarching principles when planning, developing and implementing publicly-funded information and advertising campaigns. The principles require that campaigns are:</p> <ol style="list-style-type: none"> <li>1. relevant to government responsibilities</li> <li>2. presented in an objective, fair and accessible manner</li> <li>3. objective and not directed at promoting party political interests</li> <li>4. justified and undertaken in an efficient, effective and relevant manner, and</li> <li>5. compliant with legal requirements and procurement policies and procedures.</li> </ol>

23 J Faulkner (Special Minister of State), and L Tanner (Minister for Finance and Deregulation), ‘New Advertising Guidelines’, joint media release 22/2008, 2 July 2008.

24 *ibid.*

25 Principle 5 reflects pre-existing legal requirements which an entity’s accountable authority is required to comply with in any case, irrespective of the Guidelines.

26 Under section 21 of the PGPA Act the accountable authority of a non-corporate Commonwealth entity must govern the entity in accordance with paragraph 15(1)(a) of the Act in a way that is ‘not inconsistent with the policies of the Australian Government’. Paragraph 15(1)(a) provides that the accountable authority must govern the entity in a way that ‘promotes the proper use and management of public resources for which the authority is responsible’. Section 8 provides that ‘**proper**, when used in relation to the use or management of public resources, means efficient, effective, economical and ethical.’ Section 8 further provides that ‘**public resources** means relevant money, relevant property, or appropriations.’

Source: Department of Finance, *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, 2014; and *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020.

### *New communications framework and strategic themes for government campaigns*

1.11 In late 2019, the government asked Finance to commission external consultants (PwC Australia) to conduct reviews into the effectiveness of the existing approach to government campaign development and campaign approval, with a view to moving to 'a best practice arrangement'. Two reviews were conducted, and the following reports provided:

- *Best Practice Communications Strategy and Media Plan Design* — a September 2019 report that reviewed better practice communications strategy and media plan design for the Australian Government with a view to modernise and improve the existing approach. The review focused on Principle 4 of the 2014 Guidelines<sup>27</sup> and suggested that the approach to efficiency should be broadened from seeking financial efficiency in the appointment of appropriate panel providers, to considering efficiency in all aspects of a campaign, including the campaign development process, the work being produced, and the impact it is having in the market. Accordingly, there should be a focus on:
    - **Efficiency:** More than cost, is the campaign being produced in a way that is efficient in its use of time, resources and agency expertise?
    - **Efficacy:** Is the work being created cutting through and really making an impact, delivering the results and effectiveness that is required of the campaign?
    - **Relevance:** Is the targeting, messaging and creative approach being done in a way that is specific to the audience and done so in a way that is relevant to them and clearly communicates the action that needs to be taken?
  - *Integrated Government Communications* — a December 2019 report that summarised feedback from stakeholders<sup>28</sup> into how the concepts discussed above could be achieved. Feedback incorporated analysis obtained from: workshops with entities and suppliers; a better practice desktop review; a review of state government approaches to integrated communications; and interviews with procurement staff. The report recommended changes to optimise a new approach to campaign development.
- 1.12 Taken together, the two reviews identified that Australian Government campaigns:
- tend to be short-term, awareness focussed with little lasting impact, and targeted, integrated campaigns can reach an audience in a way that is impactful, relevant and memorable;
  - are procurement-led rather than communications-led;

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27 At that time Principle 4 was that 'campaigns should be justified and undertaken in an efficient, effective and relevant manner'. The report commented that all 5 principles should be expanded to address the development of any integrated campaign activity that may or may not use advertising. The report considered that limiting their application to advertising only may not accurately reflect the range of ways the information can be communicated, the size of the audience impacted by an initiative, or a major change in the way government interacts with citizens. The report considered that all of these circumstances have significant impact in the community and impact the government's reputation.

28 Stakeholders included research, creative, media and publication relations agencies, departmental representatives and officials from the Departments of the Prime Minister and Cabinet and Finance.

- are often not integrated — the campaign focus is on advertising only and not broader engagement through social media, public relations activities and multicultural communications; and the expertise of consultants engaged is not maximised to deliver integrated campaigns; and
- government approvals are heavily focused on the creative and not on the strategic framing of campaigns.

1.13 In response to recommendations from the two reviews, the government agreed to a new communications framework based around the government's key strategic communication themes, revised approval arrangements, and implementation of the Government Communications Campaign Panel (outlined in Box 2 above).

1.14 The new communications framework identifies six key strategic communication themes:

- **security** — campaigns focused on the security of Australia and Australians;
- **delivering government programs & services** — campaigns focused on clear points of action that solve key challenges;
- **health and wellbeing** — campaigns focused on services that improve overall wellbeing;
- **economy** — campaigns focused on measures that secure economic stability and progress;
- **building our community** — campaigns promoting events or initiatives that unite us; and
- **innovation and infrastructure** — campaigns that promote progress on things like innovation and infrastructure.

1.15 The changes are intended to increase the impact and effectiveness of campaign messaging. New campaigns are to be aligned to a theme and the delivery of campaigns within each theme is to be supported by a 'village' of communications suppliers. The 'village' of suppliers comprises those allocated to each theme, who would work together to provide an integrated approach to campaign development.<sup>29</sup>

1.16 The six key strategic communication themes, and new SDCC approval arrangements, have been incorporated in a guidance note (April 2021) on processes prepared by the Department of the Prime Minister and Cabinet.

### *New government approval arrangements*

1.17 Finance documentation indicates that the implications of the new arrangements for the government were:

- increased ability to provide strategic direction and oversight;
- engagement regarding communications outcomes and strategy, not restricted to process approvals; and
- the ability to have whole of government visibility to manage communications in a more strategic and transparent way.<sup>30</sup>

<sup>29</sup> Finance considered that 'villages' would become experts in delivering campaigns across their theme. Under the 'village' model consultants and government would come together earlier than under the previous arrangements.

<sup>30</sup> Previously, the government had reviewed advertising campaign development at key milestones.

1.18 As part of the changes, government review and approval processes changed to enable input at the early stages of campaign development.

*Revised procurement arrangements for engaging campaign advertising suppliers*

1.19 Until 15 March 2021 use of the Campaign Advertising Supplier Register (CASR)<sup>31</sup> was mandated for all procurements by non-corporate entities conducting advertising campaigns with an anticipated budget above \$250,000. Use of the CASR involved the completion of up to five separate limited tenders for each campaign, which extended the timeframes for campaign development and resulted in many suppliers working independently and sequentially on campaign development. These arrangements were considered by Finance to impede the delivery of timely, integrated campaigns.

1.20 The government decided to reduce the number of approved campaign advertising suppliers and align the suppliers to a prioritised framework of campaign advertising. The proposed arrangement was intended to streamline the engagement of communications consultants, build relationships with service providers to develop an integrated approach to campaign development, drive better practice campaigns and achieve cost efficiencies. In June 2020, the Minister for Finance agreed that:

- Finance establish new mandatory panel arrangements to ‘support the delivery of best practice advertising campaigns’<sup>32</sup>;
- the panel arrangements be mandatory for all non-corporate Commonwealth entities<sup>33</sup>; and
- to fund the changes, Finance would adjust the cost recovery fee applying to non-corporate Commonwealth entities from six per cent of campaign media expenditure to eight per cent.<sup>34</sup> During the audit Finance advised the ANAO that the fee had increased to nine per cent.

1.21 In conjunction with other APS entities<sup>35</sup>, Finance initiated a limited tender process involving 53 suppliers listed on the Campaign Advertising Supplier Register (CASR).<sup>36</sup> In February 2021 Finance negotiated with 20 potential suppliers and established a standard rate card across each supplier type.<sup>37</sup> The 20 nominated suppliers agreed to join the panel, which included agreed, fixed costs for

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31 The CASR was the mandated procurement mechanism established by Finance for the development and implementation of all advertising and information campaigns. The CASR was a continuously open, whole-of-government multi-use list of suppliers, with 166 suppliers registered as at October 2020. The CASR comprised five categories of communications suppliers: advertising; market and social research; public relations; specialists in communicating with Indigenous Australians; and specialists in multicultural marketing.

32 Entities still have to conduct a procurement process to scope the nature and cost of the services to be provided.

33 With the exception of the Australian Electoral Commission and the Department of Defence (for Defence Force Recruiting campaigns only).

34 Under the previous arrangements, entities undertaking advertising campaigns had remitted six per cent of their media placement costs to Finance as part of cost recovery arrangements for coordinated procurements. The Minister for Finance was advised that to support Finance’s role in managing the new procurement arrangements and other work to drive better campaign practice, an increase to eight per cent was proposed and that without the increased fee the expected benefits of the arrangements could not be delivered.

35 The procurement evaluation team included representatives from Finance and six other entities.

36 Responses were received from 46 suppliers. Thirty potential suppliers were shortlisted to participate in collaboration sessions.

37 For example, research or public relations.



some aspects of service provision, including standard hourly rates for professional and specialist staff. Where Finance determined that production costs could not be fixed, a commitment to periodically audit the arrangement was made to evaluate value for money.

1.22 In February 2021, the government endorsed the full implementation of, and transition to, the new procurement arrangements, to be known as the Government Communications Campaign Panel (GCCP). In March 2021, the Assistant Minister for Electoral Matters<sup>38</sup> agreed to the allocation of the 20 suppliers across the six communication themes discussed in paragraph 1.14 above.<sup>39</sup> The successful suppliers were appointed for three years with an extension option for a further four years.

1.23 Finance advised the Assistant Minister for Electoral Matters that campaigns in development would transition to the new procurement arrangements by August 2021, and that all new campaigns initiated from March 2021 would access suppliers from the GCCP. Universal McCann and Hall & Partners, although not members of the GCCP, work across all themes in collaboration with GCCP suppliers. Appendix 4 lists the 20 GCCP suppliers and the themes they are allocated to.

1.24 The entities conducting advertising campaigns reviewed in this audit have engaged suppliers through the CASR.<sup>40</sup>

## Previous audits

1.25 The administration of government advertising has been examined in a series of ANAO performance audit reports, which also reviewed the development of the campaign advertising framework since its introduction in 2008. The most recent report in the series, published in August 2019, observed that:

The Australian Government's campaign advertising framework was introduced in 2008 with the express purpose of providing confidence that taxpayer funded campaigns are legitimately authorised, properly targeted and non-political. A decade on, this area of government administration remains contested, with an ongoing focus on the discretion inherent in the framework and the long-term trend of increased campaign expenditure before elections. The persistence of debate over the use of public resources for certain government campaigns indicates that the framework has not achieved its primary purpose of building confidence and is therefore ineffective in respect to this outcome. In these circumstances, there would be merit in the Parliament and Australian Government revisiting the framework.<sup>41</sup>

1.26 The 2019 audit report included 10 recommendations, five of which were directed to Finance or the Australian Government and five directed to the three other entities included in the audit.<sup>42</sup>

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38 At this time, the Assistant Minister for Electoral Matters was also the Assistant Minister to the Prime Minister and Cabinet and the Assistant Minister for the Public Service. Prior to this, for the period 29 May 2019 to 22 December 2020 the relevant minister was the Assistant Minister for Finance, Charities and Electoral Matters.

39 A key role for the Assistant Minister for Electoral Matters under the campaign reforms is to give authority for campaigns to commence and allocate them to the appropriate theme.

40 Phase two of the Economic Recovery Plan campaign commenced under a transitional arrangement to the GCCP. Treasury obtained approval for the retention of research and creative suppliers contracted for phase one of the campaign through the CASR, but under the contractual arrangements of the GCCP.

41 Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, p. 9, available from <https://www.anao.gov.au/work/performance-audit/government-advertising-june-2015-to-april-2019>.

42 Three were directed to the Department of the Environment and Energy, one to the Department of Health and one to the Department of Education.

Action taken by Finance and the Australian Government in response to one of the recommendations — to strengthen the Guidelines by making it clear that compliance with principles 1 to 4 was mandatory.— was discussed in paragraphs 1.9 to 1.10 above. Implementation of the remaining recommendations directed to Finance and the government is discussed in the next chapter.

## Rationale for undertaking the audit

1.27 The rationale for undertaking this audit is to provide the Parliament with: information on key developments in the Australian Government’s campaign advertising framework since 2019, when the ANAO last reported on its operation; independent assurance on whole-of-government administration of the framework by the Department of Finance; and independent assurance on selected entities’ compliance with the Australian Government’s guidelines and the wider framework requirements when planning and undertaking advertising campaigns.

## Audit approach

### Audit objective, criteria and scope

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

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

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

1.30 The audit examined developments in the administration of the framework from May 2019 to October 2021. In addition, three campaigns were selected for review:

- Phase 2 of the Building Our Future campaign, conducted from January 2019 to June 2021 and administered by the Department of Infrastructure, Transport, Regional Development and Communications (Infrastructure);
- the Domestic Violence Support Services (Help is Here) campaign, conducted from May 2020 to January 2021 and administered by the Department of Social Services (DSS); and
- Phases 1 and 2 of the Economic Recovery Plan campaign, administered by the Department of the Treasury (Treasury). Phase 1 was conducted from October 2020 to December 2020 and Phase 2 was scheduled from June 2021 to October 2021 but was paused on 1 July 2021 due to COVID-19 lockdown restrictions.<sup>43</sup>

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43 The campaign was paused at the time the ANAO was conducting audit fieldwork. In October 2021 Treasury advised the ANAO that a relaunch date had not yet been established and there were currently no plans to recommence advertising for this campaign. Treasury further advised that due to the extensive COVID-19 outbreaks across the country further research was required to understand the information needs of the community and business.

1.31 The audit also assessed the implementation by Finance and the selected entities (where applicable) of previous ANAO audit recommendations relating to government advertising.

### **Audit methodology**

1.32 The audit methodology included:

- reviewing Finance-commissioned reviews, the Guidelines and changes to the Guidelines, advice to entities and public reporting produced by Finance;
- reviewing meeting minutes and decisions of the ICC and interviewing committee members;
- reviewing SDCC and entity documentation relating to campaign design, administration, certification and evaluation; and
- discussions with key personnel at each designated entity.

1.33 The audit was conducted in accordance with ANAO Auditing Standards at a cost to the ANAO of approximately \$683,500.

1.34 The team members for this audit were Grace Guilfoyle, Elizabeth Wedgwood, James Sheeran, Jo Rattray-Wood and Michelle Page.

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

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### Areas examined

This chapter examines whether the administration of the Australian Government's campaign advertising framework at a whole-of-government level by the Department of Finance (Finance) has been effective.

### Conclusion

Finance has been effective in its central agency role of supporting entities, providing secretariat support to the third-party reviewer (the Independent Communications Committee), preparing the annual campaign expenditure report and advising government on emerging risks, issues and framework changes including options for responding to previous ANAO performance audit recommendations.

### Recommendations and opportunities for improvement

The ANAO made one recommendation to Finance to clarify the application of certification requirements for public relations activities under the Guidelines.

The ANAO identified opportunities for Finance to:

- advise entities on seeking Ministerial permission for the publication of campaign related research;
- consider making a campaign advertising Rule of the sort applying to Commonwealth procurement and grants administration;
- further increase transparency in the annual reporting of advertising expenditure;
- further support entities to evaluate the effectiveness of their campaigns;
- take an active role in building public sector capacity in relation to government advertising; and
- evaluate whether changes to the framework have achieved the intended outcomes.

2.1 The Department of Finance (Finance) provides policy advice, whole-of-government coordination, and assistance to entities conducting campaign activities. To examine whether Finance's administration of the campaign advertising framework was effective, the ANAO assessed:

- whether components of the framework are clearly documented to assist entities conducting advertising campaigns;
- whether the third-party campaign review process provides effective assistance to decision-makers;
- the transparency of Finance's public reporting of government advertising; and
- Finance's management of risks, issues and framework changes; including Finance's advice on options for responding to previous ANAO performance audit recommendations.

## Are the components of the framework clearly documented to assist entities conducting advertising campaigns?

The components of the Australian Government's campaign advertising framework, including the roles and responsibilities of stakeholders and decision-makers, are documented by Finance, to assist entities conducting advertising campaigns. Finance maintains a suite of guidance documents on a clearly signposted section of its website, to assist entities' understanding of the framework. Finance has prepared draft guidance to address recent changes to the framework. There is an opportunity for Finance to clarify framework requirements relating to public relations activities. In addition, entity accountable authorities should make active decisions on whether to seek Ministerial permission for the publication of campaign related research, and Finance could usefully draw this matter to the attention of entities if approached for advice.

### Guidance and information

2.2 As discussed in chapter 1 (see Box 1), the Australian Government's campaign advertising framework (the framework) consists of multiple components. Finance publishes information on the framework on a clearly signposted section of its website under four categories: Government Advertising Overview; Policies and Guidance; Publications and Compliance Advice; and Guidance and Information.

2.3 The framework is multi-faceted, and at the time of completing audit fieldwork (October 2021) there were 16 guidance documents provided to assist entities. Collectively, the guidance documents communicate requirements for entities conducting advertising campaigns. Finance documents its role in the management of the framework, the roles of key stakeholders and decision-makers, and the operation of the framework in an annual expenditure report, *Campaign Advertising by Australian Government Departments and Agencies*. Relevant Cabinet committee processes are documented by the Department of the Prime Minister and Cabinet.

2.4 During the audit Finance prepared the *Village Implementation Guide* (the Guide), which is draft guidance to address the changes to the framework outlined in chapter 1 of this report (see paragraphs 1.6 to 1.24).<sup>44</sup> Finance advised the ANAO that the Guide had been widely distributed to entities undertaking advertising campaigns and that, following the receipt of feedback from entities and communications suppliers, it would be further refined and issued.

2.5 During the audit the ANAO observed opportunities for Finance to clarify the application of certification requirements for public relations activities under the Guidelines and for an entity's accountable authority to make active decisions regarding whether to seek Ministerial permission for the publication of campaign related research for each campaign.

44 The Guide states that: 'It has been designed for everyone involved in, or responsible for, producing government campaigns. This includes communications officers in government departments (responsible departments), members of the Communications Advice Branch (CAB) in the Department of Finance, and the consultants appointed to each of the Government's Communications Campaign Villages. It provides practical steps to executing government communications campaigns, from campaign initiation through to post-campaign evaluation and measurement.'

## Public relations activities

2.6 As outlined in paragraph 1.3 of this report, the 2020 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. Information campaigns typically involve a mix of public relations or below the line activities, but do not include a paid advertising component.<sup>45</sup>

2.7 Public relations or below the line activities can be used in both advertising and information campaigns, can involve the expenditure of significant sums of public money, and can be an integral part of such campaigns. However, the certification requirements set out in the 2020 Guidelines only apply to advertising campaigns over \$250,000.

2.8 The 2020 Guidelines state that:

Information campaigns are not subject to review by the Independent Communications Committee or certification by the Accountable Authority but must comply with these Guidelines and other relevant policies and processes ...<sup>46</sup>

2.9 The requirements for review and certification of campaigns are determined by the value of the campaign and whether advertising will be undertaken.<sup>47</sup> Specifically, the 2020 Guidelines state that:

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

- The Independent Communications Committee will consider the proposed campaign and provide a report to the Accountable Authority on compliance with Principles 1, 2, 3 and 4 of the Guidelines. Entities will be responsible for providing a report to their Accountable Authority on campaign compliance with Principle 5 of the Guidelines.
- Following consideration of the reports on campaign advertising compliance, the Accountable Authority will certify that the campaign complies with the Guidelines and relevant Government policies ...<sup>48</sup>

2.10 As discussed in chapter 3 of this report (see Table 3.1), the Department of Infrastructure, Transport, Regional Development and Communications (Infrastructure) spent approximately \$1.4 million on public relations activities as part of the Building Our Future campaign. During the audit the ANAO discussed the application of the Guidelines to its public relations activities. In

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45 Department of Finance, *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*, October 2020, paragraph 5.

46 *ibid.*, paragraph 20. This means that entities subject to the Guidelines must nonetheless be able to demonstrate compliance with the five overarching principles when planning, developing and implementing publicly funded information and advertising campaigns. This applies to paid social, public relations and multicultural communications, not only to paid media placement.

47 *ibid.*, paragraph 16, which also states that:

‘The value of a campaign is the budget for all campaign elements across all financial years and includes:

- market or social research, public relations, advertising and/or other specialist suppliers commissioned in the development of advertising material;
- production and placement of advertising in any paid media channel (including but not limited to print, radio, digital, social media, cinema, television, out-of-home media); and
- production and dissemination of other campaign materials.’

48 *ibid.*, paragraph 19.

response, Infrastructure advised the ANAO that:

It is the department's understanding, based on previous campaign experience ... and advice from CAB [Finance's Communications Advice Branch] that public relations activities are not subject to the same certification requirements as advertising materials. Public relations activities alone do not require certification.

However, public relations materials were developed in the spirit of the guidelines, were factual in nature and stemmed from the campaign key messages.

Public relations materials were fact checked through the policy area in all circumstances.

The public relations approach is also included in the Wave 3 Statement Against the Principles ... which was part of the certification pack.

The department notes that public relations activities are mentioned in the Statement Against the Principles, which is supplied to the Accountable Authority as part of the campaign certification process.<sup>49</sup>

... Furthermore the Guidelines suggest public relations activities are not subject to the same certification requirements as advertising materials – information campaigns involving public relations alone do not need to be certified by the Accountable Authority (see paragraph 20). Therefore the department feels clarification is required in relation to the operation of the Guidelines in relation to this point.

2.11 Finance and the audited entities advised the ANAO that under the previous arrangements, campaign public relations activities might not be determined at the time campaign advertising materials were reviewed by the Independent Communications Committee (ICC) and the Service Delivery and Coordination Committee of Cabinet (SDCC), nor at the time the accountable authority certified campaign compliance with the Guidelines and relevant government policies.<sup>50</sup> Under the revised communications framework using the 'village' model (discussed in paragraphs 1.14 and 1.15), suppliers<sup>51</sup> and government entities collaborate from the instigation of the campaign rather than sequentially and independently as under the previous arrangements. This has the potential to clarify each supplier's role and specify how activities, such as public relations activities, are incorporated into the campaign objectives.

2.12 Infrastructure's response to the ANAO indicates that there is an opportunity for Finance to strengthen and clarify certification requirements relating to public relations activities, to provide additional confidence in the administration of public relations activities, which can consume significant public resources. This may require the amendment of the 2020 Guidelines.

49 ANAO comment: the ANAO has observed that entities undertaking campaign advertising often provide the accountable authority with documented verification of each campaign statement to provide assurance that campaign information is accurate and verifiable.

50 Entity feedback was based on experiences prior to the introduction of the new communications framework.

51 Research, advertising, public relations, multicultural and Indigenous suppliers.

## Recommendation no. 1

2.13 The Department of Finance clarify the application of certification requirements for public relations activities under the 2020 *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities*.

**Department of Finance response:** *Agreed.*

2.14 *Finance agrees the recommendation and will continue to work with Commonwealth entities to support their understanding of the Guidelines.*

## Publication of research reports

2.15 Paragraph 22 of the 2020 Guidelines states that:

Accountable Authorities will ensure that:

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

2.16 As discussed in paragraphs 3.19, 4.18 and 5.19 of this report, none of the audited entities published research reports for the selected advertising campaigns on their websites. Entities advised the ANAO that research reports conducted as part of government advertising campaigns are provided to the relevant Cabinet sub-committee to inform Cabinet decision making. Research reports are therefore considered Cabinet-in-Confidence and may only be released publicly with the written agreement of the government. One entity advised the ANAO that it had received advice from the Department of Finance's Communications Advice Branch to that effect.

2.17 None of the audited entities had documented any consideration of whether the research for the selected campaigns was appropriate for release and none had sought Ministerial permission for the publication of campaign related research. Given the requirement in paragraph 22 of the Guidelines, accountable authorities should be making active decisions on whether to seek Ministerial permission for the publication of campaign related research for each campaign. Finance could usefully draw this matter to the attention of entities if approached for advice. The basis of the decision should be documented. The publication of research enhances transparency.<sup>52</sup>

## Does the third-party campaign review process provide effective assistance to decision-makers?

Noting the limitation that the Independent Communications Committee's (ICC) review occurs prior to the finalisation of campaign development, the ICC review process provides effective assistance to decision-makers.

52 The 2020 Guidelines state that in demonstrating compliance with Principle 4 (that campaigns are justified and undertaken in an efficient, effective and relevant manner) campaigns 'are only instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence.'



## Independent Communications Committee

2.18 The Independent Communications Committee (ICC)<sup>53</sup> undertakes a third-party review of government advertising campaigns and provides compliance advice to entity accountable authorities. Its specific functions, which have remained substantively unchanged since the 2019 ANAO performance audit of government advertising<sup>54</sup>, include:

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

2.19 Finance advised the ANAO that in relation to the second and third dot points, the ICC has not provided any advice to the Minister in the period under review.

2.20 Entities presenting campaigns for ICC review are required to provide:

- a statement against principles 1 to 4 of the Guidelines;
- the campaign communications strategy;
- any developmental research and/or evaluation research conducted; and
- the media strategy and media overview.

2.21 Following the changes to the framework discussed in paragraphs 1.6 to 1.24, entities engage all 'village' suppliers from the commencement of the campaign, rather than sequentially and independently during the development of the campaign. Accordingly, material presented to the ICC is informed by entities working with all their media suppliers.

2.22 The ICC members appointed effective 1 July 2020 have reviewed campaigns before and after the implementation of the framework changes. ICC members advised the ANAO that they have observed improvement in the standard of documents presented to the committee and the quality of the conversation, which now benefits from the contributions of the full range of specialists (policy, communications, research, creatives, media and public relations, Indigenous and culturally and linguistically diverse (CALD)). ICC members also observed that the committee's oversight of

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53 The Assistant Minister for Finance, Charities and Electoral Matters appointed three replacement members to the ICC in June 2020 to commence from 1 July 2020. These were: Mr Andrew Blyth (Chair); Ms Meredith Fairweather (Member); and Mr Paul Vane-Tempest (Member).

On 20 February 2020, the Assistant Minister agreed to extend the contracts of the previous ICC chair and members under their existing terms of reference and remuneration until 30 June 2020. All contracts had been due to expire on 1 March 2020 following a five-year term. The membership extension was sought to enable time for Finance to conduct a process to select and appoint new members. The new ICC appointments were made for a two-year period from July 2020 with provision for extension by a further year.

54 The Assistant Minister for Finance, Charities and Electoral Matters approved revisions to the ICC's terms of reference in June 2020, including the following changes: the role of ICC members was defined at a practical level (day-to-day business) and linked to the principles of the Guidelines; the functions of ICC members were expanded to include reference to the evidence and other materials presented to them for review; and changes to other arrangements including quorum requirements, acting arrangements and protocols.

campaigns has facilitated networking between entities regarding campaign structure or delivery, resulting in improvements to the campaign approach.

2.23 The ICC's review continues to occur prior to the finalisation of campaign materials and its written advice confirms that the campaign is 'capable' of compliance with principles 1 to 4 of the Guidelines, not whether the campaign is actually compliant. All ICC reports published on Finance's website (under *Campaign Advertising Compliance Advice*) between May 2019 and 16 August 2021 have adopted this approach.

2.24 To enable the ICC to advise an accountable authority on whether a campaign is actually compliant with principles 1 to 4 of the Guidelines, the review would need to be conducted when all materials are finalised. The ANAO's 2019 performance audit report on government advertising included a recommendation (No.2) that the:

Australian Government amend the terms of reference for the third-party compliance advisory function (currently undertaken by the Independent Communications Committee) to enable it to review and advise on:

- a. campaigns at any stage of development; and
- b. final advertising materials, including creative materials and the media plan.

2.25 In its February 2020 advice to the Assistant Minister for Finance, Charities and Electoral Matters on this ANAO recommendation, Finance stated that:

There are two possible options:

The ICC role could be adjusted to have discretion about the point when it reviews campaigns. In practice, this could mean that campaigns would be reviewed iteratively, with the ICC determining at which points it wished to consider campaigns. The risk of adopting this change is that the ICC could become (or may be perceived as) a de facto approver of campaigns, rather than as a compliance advisor. This might also introduce confusion about who is ultimately responsible for shaping the final form of campaigns and introduce extra process steps with multiple review points.

Alternately, the ICC review point could remain as is, which involves the Committee reviewing campaigns at a relatively early point, but before significant costs are incurred. In the context of the broader review of the campaign process that is currently underway, campaigns would be at a more advanced stage of conceptual development at the point they are considered by the ICC, meaning that this may assist to strengthen the Committee's compliance advice.

2.26 Finance's proposed approach was that:

The current ICC review point, which sees the Committee consider campaigns prior to significant campaign costs being incurred, could be seen as striking an appropriate balance. It is important to note that the current campaign framework requires Accountable Authorities (Secretaries and Chief Executives) to certify that the final form of campaigns are compliant with the advertising guidelines, with the ICC being one (of a number) of inputs into that process.

2.27 The Assistant Minister raised the matter with the government in September 2020 in the context of the broader reforms to the campaign process. The government decided not to implement the ANAO recommendation.

## Review of ICC meetings conducted during the period

2.28 The ICC held 29 meetings between 1 May 2019 and 1 July 2021, the period between this audit and the previous (2019) ANAO audit. The minutes of meetings record that the issues raised by the Committee included:

- the proposed timing of campaigns;
- the legislative, policy or budget underpinnings of the subject matter (matters relating to principle 1);
- the accuracy of the information to be presented in the campaign and the chosen target audience (matters relating to principle 2);
- the need to ensure that campaigns are seen as objective and not directed at promoting political interests (matters relating to principle 3); and
- the likely effectiveness of proposed campaigns (matters relating to principle 4).

2.29 The minutes documented 23 instances where the ICC determined that campaigns were capable of being compliant and seven instances where the Committee advised entities that more work was required before compliance advice could be provided.

2.30 Finance records indicate that in July 2021, the ‘new’ ICC (ie. the three members appointed in July 2020) reflected on its first 12 months and proposed changes to: the recording and reporting of minutes; receipt and structure of meeting papers to assist members conduct their review; and setting expectations with entities about briefing the committee.

2.31 In October 2021 the ICC members advised the ANAO that they were very supportive of Finance’s approach to the secretariat role, indicating that Finance was responsive to the ICC’s needs and had assisted the committee by engaging with entities to support the committee’s approach and expectations. The ICC also advised the ANAO that it would welcome Finance taking a formal whole-of-government educative role, for example through designated training programs or communities of practice.<sup>55</sup>

## Exemptions from the Guidelines

2.32 Both the 2014 and 2020 Guidelines provide that the Special Minister of State (SMOS) can ‘exempt a campaign from compliance’ with the Guidelines ‘on the basis of a national emergency, extreme urgency or other compelling reason’. The Guidelines further provide that where the SMOS approves an exemption, the ICC will be informed of the exemption, and the decision will be formally recorded and reported to the Parliament. The 2020 Guidelines added that the decision will be reported to Parliament as soon as is practicable.<sup>56</sup>

2.33 During the period examined by this audit, two campaigns were exempted. These were the:

- Department of Health’s (Health) COVID-19 campaign. The campaign was to inform Australians about COVID-19 and the hygiene related actions they could take to help stop the spread of the virus. On 10 March 2020 the exemption was agreed by the SMOS on the

<sup>55</sup> For example, training on how to present cases to the ICC and prepare a statement against the principles, or leading communities of practice where skilled entities could support less experienced entities on individual topics.

<sup>56</sup> See paragraph 5 of the 2014 Guidelines and paragraph 9 of the 2020 Guidelines.

basis of extreme urgency and the need to ensure that the Australian public was well informed about how they could protect themselves from the COVID-19 virus.

- Treasury's COVID-19 Economic Response campaign. The campaign was to inform Australians of the support available to households and businesses through the economic stimulus package. On 31 March 2020 the exemption was agreed by the SMOS on the basis of an urgent need for the Australian community to be informed about the COVID-19 related support measures, including information on a range of measures being offered to help workers, households and businesses.

2.34 In each request for an exemption, the relevant Minister (the Minister for Health and the Treasurer respectively) provided assurance to the SMOS that notwithstanding an exemption being granted, campaign advertising would be developed in accordance with the underlying principles of the Guidelines and the applicable whole-of-government procurement processes.

2.35 For each campaign exemption, the SMOS advised the ICC and the Parliament of the decision in accordance with the 2014 Guidelines.<sup>57</sup> The government reviewed advertising materials for each campaign prior to their launch.

## Does Finance reporting provide transparency in relation to expenditure on Australian Government advertising?

As required by the Guidelines, Finance has reported annual media placement and associated campaign development expenditure by non-corporate Commonwealth entities, for campaigns with expenditure greater than \$250,000, in its annual *Campaign Advertising by Australian Government Departments and Agencies—Report* (annual advertising expenditure report). This information is provided on a per campaign basis. Since 2018–19, Finance has included aggregated expenditure data on campaign development costs for campaigns with total expenditure greater than \$250,000. The provision of aggregated data has increased transparency in external reporting on Australian Government advertising expenditure.

Finance's contract with the Master Media Agency has been reported on AusTender, at a maximum value of approximately \$74 million (from 1 July 2018 to 30 June 2024). Finance's contracts with Independent Communications Committee (ICC) members are also reported on AusTender, at a combined maximum value of approximately \$195,000 (from 1 July 2020 to 30 June 2022). Details of expenditure relating to these activities are not included in Finance's annual campaign expenditure report. Including these details would further increase transparency in the reporting of government campaign related expenditure.

## Public reporting on Australian Government advertising expenditure

2.36 The Australian Parliament has required that the executive government table information on taxpayer funded advertising since at least 2003.<sup>58</sup> As required by the 2014 and 2020 Guidelines, Finance has publicly reported on campaign advertising expenditure in the annual report on

<sup>57</sup> Finance also advised the ICC of the two exemptions granted.

<sup>58</sup> See Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, pp. 36–41.

*Campaign Advertising by Australia Government Departments and Agencies* (annual expenditure report).<sup>59</sup>

2.37 Finance's annual expenditure reports provide data on direct media placement and campaign development costs for advertising campaigns with expenditure greater than \$250,000.<sup>60</sup> Campaign development costs include: creative and production costs; market research (including benchmarking, tracking and evaluation costs); public relations; multicultural marketing; Indigenous communications; printed materials and direct mail; and 'other' expenditure (such as sponsorships, merchandising and pitch fees). This information is provided on a per campaign basis.<sup>61</sup> Chapter 2 of the Finance report provides a consolidated expenditure figure for all campaign advertising media placement during the reporting period.

2.38 From 2018–19, in addition to the above, Finance has provided aggregated data on entities' campaign development expenditure. The aggregated expenditure figure reflects the quantum of Australian Government expenditure on government advertising in the reporting period. Table 2.1 reproduces key advertising related expenditure as reported in the Finance report.

**Table 2.1: Campaign advertising expenditure since 2017–18**

Year	Media placement expenditure (\$m)	Campaign development expenditure (\$m)	Total (consolidated) (\$m)
2020–21	145.3	40.9	186.1 <sup>a</sup>
2019–20	127.9	28.9	156.8
2018–19	140.0	48.3	188.3
2017–18	157.0	46.1	203.1

Note a: The Finance report states at page 31 that these figures have been rounded to one decimal place and that any discrepancies in tables between totals and sums of components are due to rounding.

All figures in this table are exclusive of GST. Media figures are gross media spend, which does not include other media-related expenses such as despatch fees, translation fees and subtitling.

Consolidated data on campaign development costs is available on a financial year basis only.

Figures relate to non-corporate Commonwealth entities under the PGPA Act.

Source: Finance *Campaign Advertising by Australian Government Departments and Agencies—Report 2020–21*, p. 31.

2.39 As discussed in chapter 1 (see Box 2), Finance's contract with Universal McCann (UM) as the Master Media Agency (MMA) for media placement is reported on AusTender.<sup>62</sup> The contract value is estimated to be \$74 million (from 1 July 2018 to 30 June 2024) and represents a core expenditure under the framework for Finance and entities.<sup>63</sup> Finance's contracts with ICC members are also reported on AusTender, and have a combined maximum value of \$195,000 (from 1 July 2020 to

59 Reporting is on a financial year basis. The campaign expenditure report is made available by the end of the calendar year.

60 Each year Finance provides a template for entities to complete and return which collects information on expenditure. Finance use these reports as the basis for its annual campaign expenditure report.

61 Information includes summary campaign information, running dates, contract values, details of suppliers engaged, and instances where ethnic and/or Indigenous media has not been used.

62 As at 21 September 2021 the value of the MMA contract reported on AusTender was approximately \$74.4 million.

63 Finance imposes a cost recovery fee on entities of nine per cent of media placement expenses. This is used to recover the cost of Finance establishing and managing the MMA contract and other administrative costs associated with the framework.

30 June 2022). Details of expenditure relating to these activities are not included in the annual campaign expenditure report. The inclusion of these expenditures would further support transparency in the public reporting of Australian Government spending on campaign advertising.

### *Government responses to previous ANAO recommendations on expenditure reporting*

2.40 The 2019 ANAO performance audit report on government advertising included two recommendations to improve the transparency of reporting.

2.41 Recommendation 3 was that:

The Department of Finance improve the transparency of its annual reporting on campaign expenditure by:

- a. reporting a total expenditure figure for all campaigns that consolidates media spend, 'consultants, services and other costs', and GST; and
- b. separating the Australian Electoral Commission's (AEC's) advertising spend relating to general elections from the overall media placement spend.

2.42 Recommendation 4 was that:

The Australian Government require entities to report on the government approved budget for any new campaign or any new phase of an existing campaign, as soon as possible after launching the campaign or new phase.

2.43 In its February 2020 advice to the Assistant Minister for Finance, Charities and Electoral Matters regarding ANAO recommendation 3, Finance stated that:

The latest (2018–19) annual report [by Finance] on campaign advertising was tabled on 31 January 2020, which includes a new table that consolidates the total costs of campaigns, thereby addressing the main part of the audit recommendation. We do not recommend taking up the other reporting changes proposed by the ANAO. Finance's reports have always provided expenditure figures exclusive of GST, which ensures that reporting aligns to Budget and other financial reports, which also exclude GST. Similarly, there is no clear benefit in specifically separating out the costs of the Australian Electoral Commission's (AEC) campaigns, as the current reporting format already enables the costs of any campaign to be readily subtracted from total expenditure.

2.44 Finance proposed to 'continue to include a consolidated table of media and non-media costs in future reporting'. The Assistant Minister noted that:

... consistent with Recommendation 3 of the of the [ANAO] Report, Administration of Government Advertising Arrangements June 2015 to April 2019, media and non-media costs have been consolidated in the 2018–19 report on campaign advertising.

2.45 The government was subsequently advised by Finance that one ANAO recommendation (relating to consolidating Finance reporting on the advertising spend, see paragraph 2.41 above) had already been addressed. Finance also advised that its annual report on campaign advertising enabled details of GST payments and the AEC's advertising spend relating to general elections (see

paragraph 2.41 above) to be derived.<sup>64</sup> Following this advice the changes recommended by the ANAO were not taken up.

2.46 In its February 2020 advice to the Assistant Minister regarding ANAO recommendation 4, Finance stated that:

A benefit of publishing planned total budgets is that it could improve transparency. However, a risk is that it may create confusion around planned versus actual expenditure ... The risk of reporting planned budgets at the point of a campaign launching is that it could, of itself, add to confusion and/or generate overestimates of the actual costs of campaigns.

**Options:** the current approach could be retained, which involves the final costs of campaigns being released only after they have concluded and the actual spend confirmed. Alternately, planned campaign budget could also be published when campaigns launch in the media.

**Finance's proposed approach:** On balance, the approach of successive Governments, which is to report on actual expenditure after it has been reconciled, is favoured, as this best manages the risk of campaign costs being overestimated.

2.47 The Assistant Minister raised the matter with the government in September 2020. The government decided not to implement recommendation 4.

### Australian Government advertising expenditure over time

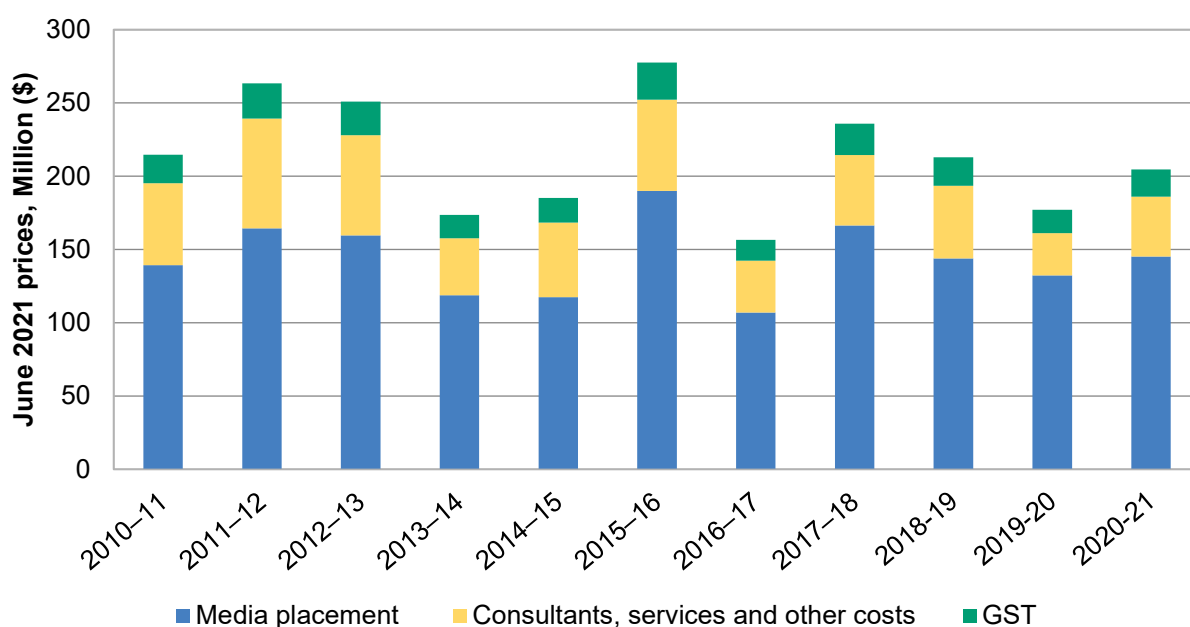
2.48 Reported campaign advertising expenditure from 2010–11 to 2020–21 for media placement, 'consultants, services and other costs', and GST, is shown in Figure 2.1 below.

2.49 Finance has reported that in 2020–21 non-corporate Commonwealth entities spent \$145.3 million on media placement and \$40.9 million on 'consultants, services and other costs' (GST exclusive). The combined total of these expenditures in 2020–21 was \$186.1 million (GST exclusive).

2.50 The ANAO has calculated that over \$2.35 billion (in June 2021 prices, GST inclusive) was spent on these components of campaign advertising over the eleven financial years reported in Figure 2.1, averaging \$213 million per financial year, adjusted for inflation.

64 As noted in paragraph 2.38 above, from 2018–19 Finance's annual report on advertising has reported a total expenditure figure for all campaigns that consolidates media spend and consultants, services and other costs. The costs are exclusive of GST and this is clearly described. In Finance's 2018–19 campaign expenditure report (the last report that covered a period when a Federal election was held), AEC expenditure relating to the 2019 Federal election was separately identified and presented in a manner that would enable users to easily separate media placement costs relating the election from the overall media placement spend.

**Figure 2.1: Campaign advertising expenditure, 2010–11 to 2020–21, June 2021 prices<sup>a</sup>**



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

Source: ANAO analysis of Finance’s campaign advertising reports based on Central Advertising System data, available from <https://www.finance.gov.au/publications/reports/advertising> [accessed 24 January 2022], using Australian Bureau of Statistics Catalogue 6401.0 to adjust for changes in the consumer price index.

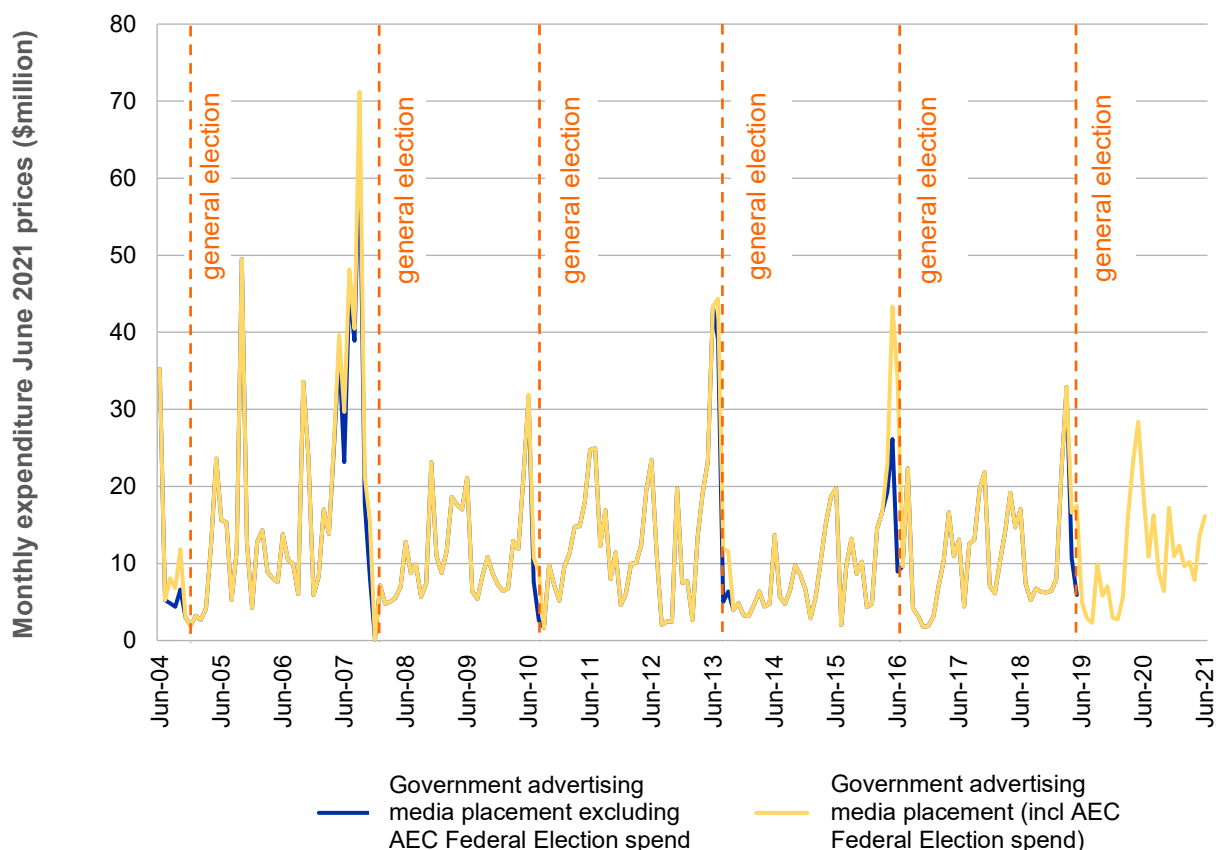
2.51 Finance’s annual expenditure report includes total government expenditure on media placement for each six-month period by financial year.

2.52 Previous ANAO reports have identified that media placement expenditure increased in the lead up to the last six federal elections, with the peaks in expenditure showing a decline from 2007.<sup>65</sup> Details of campaign expenditure on media placement from June 2004 to 30 June 2021 are provided in Figure 2.2 below.<sup>66</sup>

<sup>65</sup> See Table 2.2 of the ANAO’s 2019 performance audit report on government advertising, which reported that expenditure on media placement increased in the months prior to each federal election since 2004 (excluding Australian Electoral Commission advertising).

<sup>66</sup> Fieldwork for this audit concluded in October 2021.



**Figure 2.2: Monthly campaign expenditure on media placement (excl GST), June 2004 to June 2021**

Notes: Data from June 2004 to June 2014 is the campaign advertising media expenditure by *Financial Management and Accountability Act 1997* (FMA Act) agencies. Data since July 2014 relates to expenditure by non-corporate Commonwealth entities under the PGPA Act.

Figures do not include GST.

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

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

Since 2019, Finance has effectively managed a number of risks and issues relating to the government advertising framework, including implementation of a new communications framework and associated changes to approval and procurement arrangements. There would be benefit in Finance evaluating the impact and effectiveness of the framework changes to assess whether the intended benefits have been achieved. There is also an opportunity to maximise the value of Finance's mandated evaluation process to further improve measures of campaign effectiveness.

2.53 Finance is responsible for whole-of-government administration of the Australian Government's campaign advertising framework. The ANAO's 2019 performance audit of government advertising reported on Finance's management of emerging risks and issues, including

how Finance responded to brand safety risks in the social media environment.<sup>67</sup> This section considers Finance's management of key risks, issues and framework changes since 2019.

## **Government use of the Facebook platform**

2.54 On 18 February 2021, following the introduction of the Australian Government's news media bargaining code, the operators of the Facebook social media platform removed publishers of Australian news from its platform. This resulted in Facebook preventing users from viewing or sharing news content.

2.55 In February 2021 Australian Government Ministers were reported in the media as intending to stop or curtail the use of Facebook for Australian Government advertising, in response to the actions taken by Facebook.<sup>68</sup> Finance advised the ANAO that no whole-of-government decision was sought or taken to remove Australian Government advertising from the Facebook network.

2.56 In late February 2021 the Australian Government asked Finance, in consultation with Universal McCann (UM), to consider the implications of removing Australian Government campaign advertising from the Facebook network (Facebook, Instagram and Messenger). UM prepared a report that was provided to government for consideration and noted.

## **Media releases**

2.57 Paragraph 27 of the 2014 Guidelines, and paragraph 35 of the 2020 Guidelines, state that campaigns must not try to foster a positive impression of a particular political party or promote party political interests. Paragraph 28(d) of the 2014 Guidelines, and paragraph 36(d) of the 2020 Guidelines, state that campaigns must not be designed to influence public support for a political party. These paragraphs underpin principle 3 of the Guidelines, which relates to campaigns being 'objective and not directed at promoting party political interests'.

2.58 In the 2019 performance audit of government advertising, the ANAO reported (see paragraphs 26, 3.39 and 3.40 of Auditor-General Report No.7 2019–20) that the ministerial media release that launched a phase of one of the audited campaigns contained overt political argument, and there was also a similarity in tone and content between campaign advertising statements and ministerial media releases containing overt political argument. The ANAO observed that Ministerial statements at the launch of a campaign, and those made or released in parallel to a campaign, provide a backdrop and context to the campaign. Where Ministerial statements launching a campaign or campaign phase include political commentary, they can raise concerns that the campaign is intended to influence public support for the government of the day. To provide additional confidence regarding compliance with principle 3 of the Guidelines, recommendation 6 of that audit report recommended that:

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67 Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, pp. 42–43.

68 For example, see media reports at:

- <https://www.abc.net.au/news/2021-02-22/government-escalates-facebook-feud-by-pulling-advertising/13177688>;
- <https://www.smh.com.au/politics/federal/pm-stops-advertising-on-facebook-as-mps-call-for-more-regulation-20210219-p57443.html>; and
- <https://www.afr.com/companies/media-and-marketing/facebook-advertising-ban-extended-across-all-government-20210222-p5740q>.

The Australian Government require all media releases associated with launching a campaign or campaign phase to be subject to the approval and certification processes applying to campaign advertising materials.<sup>69</sup>

2.59 In its February 2020 advice to the Assistant Minister for Finance, Charities and Electoral Matters on ANAO recommendation 6, Finance stated that:

**Issues:** The risk of this proposed change is that it would significantly broaden what is considered part of a paid campaign and blur the boundaries of what constitutes apolitical material. Media releases, including by Ministers, have not previously been treated as part of the campaign material. Adopting this recommendation would risk greater complexity and ambiguity about what is considered part of an advertising campaign.

**Options:** The campaign Guidelines could be redrafted to include media releases as campaign materials. Alternatively, the Guidelines could remain unchanged.

**Proposed approach:** The Government may wish to confirm that media releases do not constitute campaign material.

2.60 The Assistant Minister raised the matter with the government in September 2020. The government decided not to implement recommendation 6.

## Application of the Guidelines

2.61 As discussed in chapter 1 (see paragraph 1.9), in the 2019 audit of government advertising the ANAO observed that the 2014 Guidelines could be perceived as largely discretionary, as only Principle 5 was clearly mandated.<sup>70</sup> This had been the case since the introduction of the Guidelines in 2008. The 2019 audit included a recommendation (No.1) to strengthen the Guidelines by making it clear that compliance with principles 1 to 4 was mandatory.

2.62 In February 2020 advice regarding options for responding to ANAO recommendation 1, Finance advised the Assistant Minister for Finance, Charities and Electoral Matters that:

The Government could retain the current Guidelines but would likely continue to receive adverse findings. Alternatively, we believe there are no major risks in expressing the Guidelines as mandatory, as, in practice, stakeholders already treat them as such.

Proposed approach: The Government may wish to update the Guidelines in line with the recommendation, and take the opportunity to make other changes to improve the clarity and interpretation of the Guidelines. In broad terms, the proposed changes ... include: confirming that the Guidelines are a mandatory policy; inclusion of an introduction to clarify that entities are expected to develop effective, best-practice campaigns; simplifying and re-ordering the content to aid in interpretation; and reframing the principles to largely remove the use of verbs (e.g. “should”) that could be seen as allowing for discretion.

2.63 The matter was subsequently considered by the government, which agreed to amend the Guidelines in September 2020. Finance advised the ICC of the changes at the ICC meeting of 30 September 2020.

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69 Auditor-General Report No. 7 2019–20 *Government Advertising: June 2015 to April 2019*, paragraphs 3.38 to 3.43.

70 Principle 5 reflects pre-existing legal requirements which an entity’s accountable authority is required to comply with in any case, irrespective of the Guidelines.

2.64 Finance published updated Guidelines in October 2020. Paragraph 11 of the 2020 Guidelines states that they are a government policy<sup>71</sup> and that:

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

1. relevant to government responsibilities
2. presented in an objective, fair and accessible manner
3. objective and not directed at promoting party political interests
4. justified and undertaken in an efficient, effective and relevant manner, and
5. compliant with legal requirements and procurement policies and procedures.

2.65 As discussed in chapter 1 of this report (see paragraphs 1.1, 1.8 and 1.25), the Guidelines were first introduced to provide confidence to Parliament and the public in relation to government campaign advertising. In light of Finance's February 2020 advice to government that 'there are no major risks in expressing the Guidelines as mandatory' and given the level of resources and expenditure which continue to be applied to government advertising, there is merit in Finance considering the option of making the Guidelines a statutory instrument under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act). This would be consistent with the approach adopted by the Australian Government in respect to procurement policy (through the Commonwealth Procurement Rules) and grants administration (through the Commonwealth Grants Rules and Guidelines).

## **Procurement arrangements**

2.66 As discussed in chapter 1 of this report (see Box 2):

- following an open tender process, Finance appointed Universal McCann (UM) as the sole supplier Master Media Agency (MMA) for the period 1 July 2018 to 30 June 2021. The contract end date was extended in April 2021, to 30 June 2024;
- the Government Communications Campaign Panel (GCCP) is the mandated whole-of-government panel arrangement established by Finance in 2021 following a limited tender approach to selected suppliers for the Campaign Advertising Supplier Register (CASR); and
- effective from 1 July 2018, following a limited tender process, Finance established a single provider deed of standing offer with Hall & Partners to provide standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 per financial year. The contract end date was extended in June 2020 to 30 June 2022.

2.67 Mandatory procurement arrangements with a sole supplier or a limited number of suppliers can make it difficult to demonstrate the achievement of value for money. This is particularly applicable where the supplier(s) are appointed following a limited tender process, which was the case for: GCCP members; and Hall & Partners for campaign evaluation services. Finance has

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71 See footnote 26.

implemented measures in the contractual arrangements with each supplier to mitigate risks relating to the achievement of value for money.

### *Master Media Agency (MMA) services — Universal McCann (UM)*

2.68 Finance's contract with UM consists of an annual retainer and a potential performance payment.<sup>72</sup> The performance payment is based on two assessments: a customer/entity satisfaction assessment and a Finance satisfaction assessment, as outlined in Table 2.2 below.

**Table 2.2: Basis of MMA performance payment**

Basis of MMA Performance Payment	
Customer satisfaction assessment	Finance satisfaction assessment
Derived from: <ul style="list-style-type: none"> <li>customer satisfaction survey (with potential performance payments aligned to specified client satisfaction ratings).</li> </ul>	Derived from: <ul style="list-style-type: none"> <li>audit of selected campaigns;</li> <li>media rates negotiations; and</li> <li>Finance's evaluation of the quality of the services (with potential performance payments aligned to specified outcomes from: the audits of selected campaigns to assess the effectiveness of media planning and buying; media rates negotiations outcomes; and Finance's evaluation of the quality of services).</li> </ul>

Source: Based on Deed between the Master Media Agency and the Australian Government.

#### Customer satisfaction assessment

2.69 Two annual performance assessments of the contract have been produced by a third-party contractor (Kantar Public, previously known as Colmar Brunton), via Customer Satisfaction Surveys in November 2019 and October 2020.<sup>73</sup> The surveys assessed two broad objectives: customer (entity) satisfaction with UM's performance in delivering campaign and non-campaign advertising; and opportunities for improving service delivery. Specific elements include:

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

<sup>72</sup> The annual retainer ranged from approximately \$9.8 million to \$10.6 million (GST exclusive) over the life of the contract (1 July 2018 to 30 June 2024).

<sup>73</sup> Finance undertakes biannual customer satisfaction surveys.

2.70 The November 2019 MMA Customer Satisfaction Survey reported: a rating of overall customer satisfaction for UM's advertising services in the 2018–19 financial year of 6.60 out of 10, or 'average'.<sup>74</sup>

2.71 The October 2020 survey reported evidence of improvement from 'average' to 'good', with the overall score increasing to 7.75 out of 10.<sup>75</sup> As at the end of October 2021 (the completion of ANAO fieldwork) the 2020–21 Customer Satisfaction Survey had not been completed.

#### Finance satisfaction assessment

2.72 Finance's contract with UM specifies third-party monitoring of performance and includes being subject to audits<sup>76</sup> to verify UM's annual negotiation of media rates to meet contractual requirements.<sup>77</sup> The UM contract also includes payment incentives for media rate saving outcomes achieved by UM during the annually conducted media rate negotiations with media suppliers.

2.73 Finance's internal auditor (KPMG) is contracted to test the accuracy of the savings reported by UM and to assess UM's quality assurance activities. The outcomes of these audits are reported to Finance's audit committee. These audits have reported that media rate savings were achieved via UM in 2018–19, 2019–20 and 2020–21, and that the savings had fluctuated over this period.

2.74 UM received annual Customer Satisfaction Performance Payments in 2018–19 and 2019–20 based on:

- the customer satisfaction survey conducted by Kantar;
- confirmation by Finance's internal auditor (KPMG) of media rate saving outcomes achieved by UM during media rate negotiations with media suppliers;
- confirmation by Ebiquity, Finance's media advisor, of UM's media buying performance<sup>78</sup>; and
- Finance's assessment that UM is delivering high quality advertising services.<sup>79</sup>

#### Extension of contract with the MMA

2.75 Finance's contract with UM required Finance to notify UM in writing (by March 2021) of an intention to extend or finalise the arrangement. The expiry date for the arrangement was 30 June 2021. On 13 January 2021 Finance extended the UM contract to 30 June 2024, based on a business case which reported that the client satisfaction survey and internal audits demonstrated:

1. UM is delivering Whole of Government advertising services ... in line with the contractual obligations.

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74 Ratings between 6.00 and 7.49 are considered 'average'.

75 Ratings between 7.50 to 8.49 are considered 'good.'

76 Contracted to an external service provider (KPMG).

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

78 Ebiquity found UM's media buying performance was 'acceptable' (a score of 2 out of 3). Ebiquity describes its role in regard to media performance as: monitoring, measuring and evaluating media investment performance for greater transparency, governance, efficiency and accountability.

79 Finance documents indicate that Finance's assessment was based on the MMA proactively enhancing service provision and business processes such as: provision of ongoing training for staff and review of processes and templates in line with Ebiquity recommendations to ensure consistent high quality media planning; and ongoing improvements to UM Central which supports UM and customer entities including Finance to share documents, assist with version control and streamline reporting processes.

2. The current arrangement is delivering advertising services that represent value for money. UM is negotiating annual reductions in media rates on behalf of the Australian Government that meet expectations. The outcomes from these negotiations have notionally saved the Government \$4.3 million per year over the first two years of the arrangement ...
4. UM's performance is meeting customers' expectations ...
6. UM is delivering high quality advertising services and has steadily improved its performance against all metrics over the life of the Deed ...
- 8 ... This approach is considered better practice procurement and delivers better value for money when the arrangement is effective, is an efficient use of resources, and presents minimal risk to Finance and the broader arrangement.

## Campaign evaluation

2.76 Effective 1 July 2018, Finance established a single provider (Hall & Partners) to deliver standardised benchmarking, tracking and evaluation research services for all campaigns with total budgets above \$500,000 per financial year. Hall & Partners costs are met by entities. Finance does not pay a retainer for these services.

2.77 Finance proposed a single evaluation approach to: create consistency in reporting; enable comparison of campaign outcomes across government; and allow insights to be derived from all campaign advertising activity.<sup>80</sup> Moving to a single evaluation provider was expected to generate greater efficiency and reduce the evaluation costs of campaigns, which are met by entities from campaign budgets.

2.78 The new campaign evaluation framework is built around three key themes:

- Reach: Who saw the campaign? Where was it seen? Which media drove awareness?
- Response: Was the message well received? How did different audiences respond?
- Impact: What happened following exposure? Were there any shifts in attitudes, misconceptions and/or understanding?

2.79 In addition to evaluating individual advertising campaigns, Hall & Partners developed a Summary Insights Report, which is a meta-analysis of data from campaigns evaluated from 2018.

2.80 The following Summary Insights Reports had been prepared as at September 2021:

- *Summary Insights Report #1 – Overall Campaign Performance*, which identified that:
  - there are limited consistent performers across Reach, Response and Impact;
  - Reach alone has not necessarily been an indicator of overall campaign performance; and
  - the relationship between Reach and Impact in particular has been weak.

<sup>80</sup> Prior to this, campaign evaluations were undertaken by individual entities on a project-by-project basis.

- *Summary Insights Report #1 – Media channel mix*, which reviewed the media mix strategy<sup>81</sup> and identified that:
  - when considering campaigns with under \$2 million in media spend, campaigns which included television in the media mix were generally associated with higher reach and increased engagement (compared to campaigns which did not include television);
  - reach and spontaneous message cut through tended to be higher when the spend was predominantly concentrated within the television channel, compared to the digital / social channels; and
  - campaigns with a spend predominantly in the digital / social channels were more likely to be perceived as encouraging action compared to television-led campaigns.<sup>82</sup>

2.81 The Summary Insights Reports have provided: a view of all campaign outcomes; analysis of the metrics of reach, response and impact for each and comparison with all; and insights around the use of media spend and channel mix. Entity access to the information and data in the reports accompanied by an explanation of the analysis conducted may provide useful examples of campaign styles and approaches that may assist entities to assess and learn from the experience and diversity of earlier campaigns.

2.82 Finance advised the ANAO that the Summary Insights Reports informed the reform process, including the approaches taken to best practice communications. Extracts of the reports have been shared across the Australian Public Service (APS) including to the SES communications officer cohort, Chief Operating Officers, and at the APS Secretaries' Board. Finance further advised the ANAO that it:

... continues to work with Hall & Partners to develop robust insights, as the database continues to build, to inform the development and implementation of campaigns. Participation by Hall & Partners, and Finance in the village process provides the opportunity to share insights and learnings across government with communications practitioners.

Finance is developing an evaluation framework on the impact and effectiveness of the reforms. It should be noted that a critical mass of campaigns that have been developed through the new arrangements has yet to be arrived at from which an informed view could be derived.

2.83 With the appointment of Hall & Partners in July 2018 the introduction of a standardised campaign monitoring and evaluation methodology for advertising campaigns has enabled Finance to build a resource to inform future advertising campaigns and enable comparisons between campaigns to be made. During the audit, entities raised with the ANAO their interest in comparing

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81 The report analysed data from campaign evaluations completed as at October 2020. It compared how campaigns with a television media buy performed against those which did not utilise television and compared the Reach, Response and Impact of campaigns with a standard media mix (television, radio, outdoor, print), compared to a broader media mix (the addition of digital / social) and compared to a digital / social only media buy. The report focused on the performance of campaigns with a media spend of under \$2 million as there were sufficient data points to make a comparison between those that did (seven) and did not (14) utilise a television media buy.

82 The report noted that it is, however, unclear to what extent this is due to other campaign characteristics and not the media mix.



the performance of their campaign against the performance of other government advertising campaigns.

2.84 Entities, in conjunction with Hall & Partners, benchmark pre-campaign levels of: awareness and understanding<sup>83</sup>; and perceptions and attitudes<sup>84</sup> based on campaign objectives. Additional benchmarks may be included as required. These benchmarks facilitate tracking, monitoring and evaluation. Results against these benchmarks are monitored weekly for reach, response and impact and are included in the evaluation report at the completion of the campaign. The entities in this audit did not specify performance targets. Entities advised the ANAO that the setting of performance targets could be challenging for a number of reasons including the varied nature of campaigns and budgets, longevity in the market and media channels used. Entities advised that having access to information on outcomes achieved by other campaigns would be useful to guide the setting of performance targets.

2.85 The inclusion of targets would augment the evaluation process. It would contribute to the assessment of campaign outcomes, support transparency and inform resource decisions to continue, cease or modify a campaign.

2.86 There is an opportunity for Finance, Hall & Partners, and entities conducting campaigns to use the meta-analysis from campaigns to support the development of campaign targets. Further, Finance and Hall & Partners should engage with entities to incorporate campaign performance targets, increase understanding of how the mandated evaluation process can be used to share ‘lessons learned’, and build capability across the government sector.

## Capacity building

2.87 As part of the changes to the communications framework, the government requested that Finance take a stronger role in:

- working with entities to ensure campaigns are developed according to best practice principles and have stronger alignment to government priorities; and
- building the capacity of APS staff to deliver more efficient, effective and impactful campaigns under the new best practice model.

2.88 The government’s review of best practice communications and media plan design (discussed in paragraph 1.11) provided insights into existing capabilities and processes relating to government advertising. The report stated that:

Creating a peer based learning culture is critical for future success. Regular sharing session[s] of campaign insights, channel efficacy and trends will [lift] overall engagement and expertise.

2.89 Audited entities advised the ANAO that they were generally satisfied with Finance’s support but considered that entities would benefit from Finance taking a greater role in capability building across the sector. In particular, entities indicated that increased feedback from Finance would assist entities identify and share better practices. The entity officials involved in conducting the three campaigns examined in this audit varied in their levels of experience in undertaking campaigns.

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83 The benchmark for awareness and understanding is measured on a four point scale, for example: Fully aware, Somewhat aware, Not at all aware, Don’t know/not sure; which make up a score of 100 per cent.

84 The benchmark for perceptions and attitude is measured on a five point scale, for example: Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree; which make up a score of 100 per cent.

Entities noted that officials with less experience could find conducting an advertising campaign, often to tight timeframes, quite challenging and there would be benefit in having additional support from Finance.

2.90 As outlined in paragraph 2.31 the ICC advised the ANAO that the committee was supportive of Finance supplementing its current education role through, for example, conducting formalised training and/or leading community of practice sessions.

2.91 As discussed above, the mandated campaign evaluation process and Finance commissioned research is building a campaign data resource. Guided access to available research, and meta-analysis of campaign outcomes, would be of benefit to entities. Facilitating entity access to these resources may help drive better practice and build capability in the management of government advertising across the sector.

2.92 There would also be benefit in Finance evaluating the impact and effectiveness of the framework changes introduced, against the reasons given to support implementation.

### 3. The Building Our Future Phase 2 campaign

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#### **Areas examined**

This chapter provides an overview of the Department of Infrastructure, Transport, Regional Development and Communications (Infrastructure) Building Our Future Phase 2 campaign and examines whether Infrastructure complied with the Australian Government's campaign advertising framework when undertaking the campaign.

#### **Conclusion**

Phase 2 of Infrastructure's Building Our Future campaign was subject to the necessary review, certification and publication requirements. The campaign was relevant to Australian Government responsibilities and presented in an accessible manner. Some campaign statements did not accurately represent the Australian Government's involvement in infrastructure projects. Advertising materials were free of political content, although public relations (PR) activities undertaken during Wave 1 were not consistent with advice provided to the ICC that PR activities would not 'be instigated by any political party or politician, or make reference to any political party or politician'. A number of Wave 1 PR activities were either paid for but not delivered, or delivered in insufficient time to be used. Infrastructure did not negotiate a lower price when agreeing to a contract for a reduced range of PR services compared to the services quoted. Infrastructure demonstrated the justification for Wave 1 but not for Wave 2. The justification for Wave 3 did not take into account earlier waves' performance against campaign objectives. Each wave of Phase 2 was evaluated for effectiveness. Evaluation reports for Waves 1 and 2 did not adequately address all campaign objectives. The Wave 3 evaluation report provided a clearer assessment of performance against objectives.

#### **Recommendations and areas for improvement**

The ANAO made four recommendations aimed at: enhancing compliance with the Guidelines; assessing whether continuing a campaign represents proper use of taxpayer resources; developing a long-term communications strategy; and enhancing the effectiveness of campaign evaluation activity.

3.1 Entities undertaking campaign advertising are required to comply with the Australian Government's campaign advertising framework (the framework). To examine whether Infrastructure complied with the requirements of the framework the ANAO assessed Infrastructure's:

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

## Campaign overview

3.2 In the 2018–19 Federal Budget the Australian Government announced a \$76.4 billion, ten year ‘Infrastructure Investment Pipeline’ (the Pipeline).<sup>85</sup> The Pipeline is a package of funding for transport infrastructure projects administered by Infrastructure. Changes announced in the 2019–20 Federal Budget brought the total value of the Pipeline to approximately \$100 billion over 10 years<sup>86</sup> and the 2020–21 Federal Budget increased this further to approximately \$110 billion over 10 years.<sup>87</sup> A breakdown of the different components of the Pipeline is provided in Appendix 5.

3.3 Infrastructure administered the Building Our Future Phase 2 campaign (BOF Phase 2), which is the focus of this chapter.<sup>88</sup> BOF Phase 2 referred to the Infrastructure Investment Pipeline as the ‘Infrastructure Plan’ or the ‘10-year Infrastructure Plan’<sup>89</sup> and comprised of three waves of campaign activity:

- Wave 1 ran from January to April 2019;
- Wave 2 ran from November 2019 to January 2020; and
- Wave 3 ran from April to June 2021.<sup>90</sup>

3.4 The campaign was subject to the 2014 *Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2014 Guidelines).<sup>91</sup> Key elements of the BOF Phase 2 campaign are summarised in Table 3.1 below.

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85 Department of Infrastructure, Regional Development and Cities, *Strengthening Australia’s Cities and Regions: The Australian Government’s 10 Year Investment in Infrastructure*, Infrastructure, Canberra, 2018.

See also: M McCormack, (Minister for Infrastructure), ‘2018–19 Budget—Infrastructure: Busting Congestion, Connecting Our Regions, Improving Safety and Creating Jobs’, media release, 8 May 2018, available from <https://www.michaelmccormack.com.au/media-releases/2018/5/8/2018-19-budget-infrastructure-busting-congestion-connecting-our-regions-improving-safety-and-creating-jobs> [accessed 15 September 2021].

86 Department of Infrastructure, Regional Development and Cities, *Building Our Future: Delivering the Right Infrastructure for a Growing Nation*, Infrastructure, Canberra, 2019, available from <https://investment.infrastructure.gov.au/files/budget-2019-20/Building-Our-Future-Delivering-the-Right-Infrastructure-for-a-Growing-Nation-2019.pdf> [accessed 7 September 2021].

87 Department of Infrastructure, Regional Development and Cities, *Building Our Future: Infrastructure Investment Laying the Foundations for Economic Recovery*, Infrastructure, Canberra, 2020, available from <https://investment.infrastructure.gov.au/files/budget-2020-21/budget-2020-21-building-our-future-oct-2020.pdf> [accessed 7 September 2021].

88 Infrastructure had previously administered the Building Our Future Phase 1 campaign (BOF Phase 1), which ran from February to May 2016. At that time Infrastructure was known as the Department of Infrastructure and Regional Development. BOF Phase 1 focused on the Infrastructure Investment Program, which is a component of the Infrastructure Investment Pipeline (see Appendix 5). The BOF Phase 1 campaign was not reviewed as part of this audit.

89 Infrastructure has also referred to the Pipeline as the ‘10 Year Infrastructure Investment Plan’, the ‘Infrastructure Plan’, and the ‘10-year infrastructure program’.

90 Infrastructure referred to the BOF Phase 2 waves as Phase 2, Phase 2 Extension and Phase 2 Stage 2. This report will refer to them as Wave 1, Wave 2 and Wave 3, respectively.

91 Infrastructure advised the ANAO that Wave 3 was subject to the 2014 Guidelines, even though the campaign started after the 2020 Guidelines had been introduced, because the Building Our Future Phase 2 campaign commenced before the 2020 Guidelines came into effect.

**Table 3.1: Summary of BOF Phase 2**

Campaign summary	
Objectives	<p>Wave 1 and Wave 2:</p> <ul style="list-style-type: none"> <li>• increase community knowledge of and confidence in the Government's \$75/\$100 billion 10 year infrastructure plan;</li> <li>• increase knowledge of delivery of urban and regional infrastructure projects; and</li> <li>• increase awareness of the benefits of investment to individuals, communities and the nation that come from infrastructure investment.</li> </ul> <p>Wave 3:</p> <p>Primary objectives:</p> <ul style="list-style-type: none"> <li>• increase local knowledge of the delivery of current/active urban and regional infrastructure projects; and</li> <li>• build road users' understanding and knowledge of the benefits and impacts associated with transport infrastructure to individuals, communities and the nation via local infrastructure projects in their area.</li> </ul> <p>Secondary objective:</p> <ul style="list-style-type: none"> <li>• educate transport/road users on the importance of the Australian Government's investment in land transport infrastructure.</li> </ul>
Call to action	All waves: to visit the campaign website ( <a href="http://www.buildingourfuture.gov.au">www.buildingourfuture.gov.au</a> ).
Timing	<p>Wave 1: 13 January 2019 to 11 April 2019.</p> <p>Wave 2: 3 November 2019 to 18 January 2020.</p> <p>Wave 3: 18 April 2021 to 30 June 2021.</p>
Target audience	<p>Wave 1 and Wave 2:</p> <p>All road, rail, air and public transport users across national, urban and regional communities.</p> <p>Wave 3:</p> <p>Transport users across national, urban and regional communities who are 18 years or older, with a particular focus on:</p> <ul style="list-style-type: none"> <li>• those in regional areas;</li> <li>• females; and</li> <li>• younger audiences.</li> </ul>
Advertising activities	<p>Wave 1: television, print media, radio, cinema, digital video, digital display, digital search and specific media to reach Aboriginal and Torres Strait Islanders and culturally and linguistically diverse (CALD) people.</p> <p>Wave 2: television, print media, digital video, digital display, digital search and specific media to reach Aboriginal and Torres Strait Islanders and CALD people.</p> <p>Wave 3: television, print media, radio, out-of-home advertising, digital video, digital display, digital search, mobile advertising, social media and specific media to reach Aboriginal and Torres Strait Islanders and CALD people.</p>
Total campaign budget (GST exclusive)	<p>\$34.6 million</p> <ul style="list-style-type: none"> <li>• Wave 1: \$20.0 million.</li> <li>• Wave 2 and Wave 3: \$14.6 million.</li> </ul>

Campaign summary		
Total campaign expenditure (GST inclusive)	\$32.1 million. <ul style="list-style-type: none"> <li>Wave 1: \$18.5 million.</li> <li>Wave 2: \$3.6 million.</li> <li>Wave 3: \$10.0 million.</li> </ul>	
Media expenditure (GST inclusive)	\$23.2 million <sup>a</sup> <ul style="list-style-type: none"> <li>Wave 1: \$12.9 million.</li> <li>Wave 2: \$3.2 million.</li> <li>Wave 3: \$7.1 million.</li> </ul>	
Supplier expenditure (GST inclusive)	Wave 1:	Total: \$5.7 million <ul style="list-style-type: none"> <li>Developmental research — JWS Research \$0.5 million.</li> <li>Evaluation — Hall &amp; Partners \$0.1 million.</li> <li>Creative and website — BCM Partnership \$4.2 million.</li> <li>Public relations — OPR Agency \$0.9 million.<sup>b</sup></li> </ul>
	Wave 2:	Total: \$0.4 million <ul style="list-style-type: none"> <li>Evaluation — Hall &amp; Partners \$0.1 million.</li> <li>Creative and website — BCM Partnership \$0.3 million.</li> </ul>
	Wave 3	Total: \$2.9 million <ul style="list-style-type: none"> <li>Developmental research — JWS Research \$0.8 million.</li> <li>Evaluation research — Hall &amp; Partners \$0.2 million.</li> <li>Creative — TBWA \$1.4 million.<sup>c</sup></li> <li>Public relations — Wells Haslem Mayhew \$0.4 million.</li> <li>Website — BCM Partnership \$0.1 million.</li> </ul>

Note a: Finance's *Campaign Advertising by Australian Government Departments and Agencies Report 2018–19* included \$0.094 million as 'other' expenditure for Wave 1 of the BOF phase 2 campaign. Infrastructure advised the ANAO that this figure was incorrectly reported and should have been included in the Wave 1 media expenditure total.

Finance's *Campaign Advertising by Australian Government Departments and Agencies Report 2020–21* reported the media placement figure for Wave 3 as \$6.2 million (GST exclusive). This figure only includes gross media spend, which does not include other media-related expenses such as despatch fees, translation fees and subtitling. Infrastructure's 2020–21 Annual Report reported media expenditure as \$3,491,878 (GST exclusive). This only includes amounts paid by Infrastructure during the 2020–21 financial year.

Note b: In Wave 1 Infrastructure also spent an additional \$90,712 (excluding GST) for BCM Partners to provide imagery for PR activities. This amount is recorded under 'Creative and website'.

Note c: \$12,000 pitch fees were also paid to four suppliers (BCM Partnership, Satchi & Satchi Australia, TBWA and VMLY&R).

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

### *Campaign development and approval*

3.5 In April 2018, the Australian Government approved the development of an infrastructure advertising campaign. In May 2018, the government approved Infrastructure developing a further

phase of the Building Our Future campaign. In August 2018 the government requested that the campaign materials be revised, with national television and radio advertisements to be replaced by state-specific creative materials.

3.6 In July 2019, the government agreed that the BOF Phase 2 campaign be extended. The extension was intended to have two stages. The first (Wave 2) was designed to be a ‘maintenance burst’<sup>92</sup> and the second (Wave 3) was to incorporate refreshed advertising materials ‘informed by existing evaluation and additional research’.

3.7 The government first considered the development of Wave 3 in February 2020. Campaign development was paused in March 2020 due to the COVID-19 pandemic and recommenced in August 2020, with the intention of commencing the campaign in late 2020. In November 2020 the government agreed to delay the campaign launch. In April 2021, the government provided approval for the campaign to launch. Wave 3 contained branding used in the Department of the Treasury’s Economic Recovery Plan advertising campaign (see chapter 5). The campaign website ([www.buildingourfuture.gov.au](http://www.buildingourfuture.gov.au)) also linked to the Economic Recovery Plan website.

### *Campaign funding*

3.8 Funding of \$20 million for BOF Phase 2 was announced in the 2018–19 Mid-Year Economic and Fiscal Outlook. An additional \$3.0 million in funding was approved in March 2019, although the campaign ended before the funds were committed to any additional advertising. Infrastructure’s 2019–20 Portfolio Additional Estimates Statements included \$14.1 million for Wave 2 and Wave 3. After Wave 3 was paused due to the pandemic, the 2020–21 Portfolio Budget Statement included \$5.6 million and \$5.0 million for 2020–21 and 2021–22 respectively. Unspent funds (from the \$14.1 million) were rolled over to the 2020–21 Portfolio Additional Estimates Statements, providing \$10.3 million for Wave 3.

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92 Infrastructure advised the Secretary that ‘This maintenance burst is an important step in re-establishing the BOF brand in the minds of the community and will help ensure the previously gained increase [in] awareness is not eroded. Moreover, it affirms the longevity of the Australian Government’s investment and its commitment to deliver the critical infrastructure the country needs.’ Creative materials used in Wave 2 were largely the same as the materials used in Wave 1. Some changes were made due to developments in projects featured in the creative materials.



3.9 Each wave in BOF Phase 2 featured, in the advertising materials, projects receiving Australian Government funding. Examples are presented in Figure 3.1 below.

**Figure 3.1: Examples of press advertisements used in the BOF Phase 2 campaign**



Source: Department of Infrastructure, Transport, Regional Development and Communications.

## Were the necessary review, certification and publication requirements undertaken?

The BOF Phase 2 campaign was subject to the necessary review, certification and publication requirements. Infrastructure did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. Advice to the Secretary did not include documented verification of campaign statements for Waves 1 and 2, but did for Wave 3. The Independent Communications Committee (ICC) reviewed the three Waves of the campaign and the Secretary made the necessary certifications.

### Review by the Independent Communications Committee

3.10 The Independent Communications Committee (ICC) considered BOF Phase 2 Wave 1 on six occasions, Wave 2 on one occasion and Wave 3 on three occasions.

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



3.11 At its 6 December 2018 meeting<sup>93</sup> the ICC ‘considered that the timing of the proposed launch ... [from 9 December 2018] was unlikely to be cost effective given the proximity to Christmas and the associated lower levels of media efficiency.’ The ICC concluded that if the campaign proceeded with the planned December 2018 burst of media activity, it would not be capable of complying with Principle 4 of the 2014 Guidelines.<sup>94</sup> Infrastructure revised the media plan to contain a launch date of 13 January 2019. After considering the revised media plan the ICC concluded that the campaign was ‘capable of complying with Principles 1 to 4 of the Guidelines’. Infrastructure sought compliance advice from the ICC three more times during Wave 1. On each occasion the ICC concluded that the campaign was capable of complying with the Guidelines.

3.12 The ICC considered Wave 2 on 17 October 2019 and concluded that Wave 2 was ‘capable of complying with Principles 1 to 4 of the Guidelines.’ The ICC considered Wave 3 on three occasions, and concluded that the campaign was ‘capable of complying with Principles 1 to 4 of the Guidelines’. On the final occasion that it sought ICC consideration of Wave 3, Infrastructure provided documentation to the ICC that incorrectly referred to the Pipeline as the Infrastructure Investment Program. As noted in Appendix 5, the Infrastructure Investment Program is a component part of the Infrastructure Investment Pipeline.

### Secretary’s certification

3.13 Paragraph 14 of the 2014 Guidelines provided that the entity chief executive (the departmental Secretary, who is also the entity accountable authority) consider reports from the ICC and the department on campaign advertising compliance before giving a certification to the relevant Minister, who may launch the campaign or approve its launch. This process is intended to ensure that the ICC’s reports inform the accountable authority’s certification, which in turn informs the responsible Minister’s decision-making.

3.14 The certification process for each Wave was conducted as follows:

- Wave 1: Infrastructure provided the Secretary with a briefing pack on four separate occasions.<sup>95</sup> On each occasion a Statement Against the Principles of the Guidelines<sup>96</sup> and ICC compliance advice was provided to support the Secretary’s certification statement. The briefings provided to the Secretary did not include documented verification of campaign statements.<sup>97</sup> Providing the accountable authority with documentation confirming that information has been verified as part of the certification process assists in providing greater assurance to the accountable authority that the campaign complies with

93 The ICC had reviewed BOF Phase 2 on 18 July 2018 and concluded that the campaign was capable of complying with the Guidelines. Infrastructure returned to the ICC for compliance advice with a revised communications strategy with state-focused rather than nationally-focused campaign materials.

94 Principle 4 of the 2014 Guidelines stated that campaigns should be justified and undertaken in an efficient, effective and relevant manner.

95 On 13 December 2018, 29 January 2019, 26 March 2019 and 2 April 2019. The reasons for these were as follows: 13 December 2018 — certification in anticipation of the January 2019 campaign start; 29 January 2019 — certification for public relations activities; 26 March 2019 — certification for increase in regional media placement funding; and 2 April 2019 — certification to increase ‘\$75 billion’ to ‘\$100 billion’ on campaign material to demonstrate additional funding committed to infrastructure projects.

96 A Statement Against the Principles is a document prepared by entities to provide their accountable authority with advice on a campaign’s compliance with principles 1 to 4 of the Guidelines.

97 Paragraph 21 of the 2014 Guidelines stated that ‘Where information is presented as a fact, it should be accurate and verifiable.’

the Guidelines. Public relations activities undertaken during Wave 1 were not assessed by Infrastructure for compliance with the principles.

- Wave 2: Infrastructure provided the Secretary with a briefing pack that included: a Statement Against the Principles of the Guidelines and ICC compliance advice. There was no documented verification of campaign statements. Wave 2 did not contain any public relations activities.
- Wave 3: there was documented verification of campaign statements and the information provided to the Secretary in the briefing pack was more extensive<sup>98</sup> than in Wave 1 and Wave 2. Information provided to the Secretary regarding public relations activities was limited and there was no documented assessment of those activities' compliance with the principles.

3.15 As discussed in chapter two of this audit report (paragraphs 2.6 to 2.12), Infrastructure raised issues with the ANAO regarding the application of the Guidelines to public relations activities, advising the ANAO that:

It is the department's understanding, based on previous campaign experience ... and advice from CAB [the Department of Finance's Communications Advice Branch] that public relations activities are not subject to the same certification requirements as advertising materials. Public relations activities alone do not require certification.

3.16 As further discussed in chapter 2 (paragraph 2.12), Infrastructure's response to the ANAO indicates that there is an opportunity for Finance to strengthen and clarify certification requirements relating to public relations activities to provide additional confidence in the administration of public relations activities, which can consume significant public resources. In the context of this campaign, public relations activities represented \$1.4 million (discussed further from paragraph 3.34).

## Publication processes

3.17 For all Waves, Infrastructure published the Secretary's certification statements on its website. The Department of Finance (Finance) published the ICC's advice on its website, as required under the Guidelines, after each wave of the campaign launched.<sup>99</sup> Infrastructure published details of the campaign in its 2018–19, 2019–20 and 2020–21 annual reports, although in the 2018–19 annual report Infrastructure did not present the campaign information in accordance with requirements set out in the PGPA Rule.<sup>100</sup>

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98 The certification pack included information such as ICC compliance advice, internal advice on campaign compliance with legal requirements, chief executive certification, campaign chronology, media plan, campaign advertising material and evidence of website compliance.

99 In Wave 1, Infrastructure sought ICC advice three times after the wave had commenced. ICC compliance advice provided to Infrastructure on two of these occasions (23 January 2019 and 2 April 2019) was published on Finance's website. Finance advised the ANAO that ICC compliance advice provided on 22 March 2019 was not published on Finance's website because 'advice from the 22 March 2019 meeting was superseded by the ICC's advice dated 2 April 2019.'

100 PGPA Rule 17AH(1)(a)(i) states that:

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

3.18 Paragraph 17 of the 2014 Guidelines and paragraph 22 of the 2020 Guidelines state that Chief Executives/Accountable Authorities:

... will ensure that:

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

3.19 Similar to DSS and Treasury (as discussed in paragraphs 4.18 and 5.19), Infrastructure did not publish research reports relating to its advertising campaign on its website. All entities advised the ANAO that research reports conducted as part of government advertising campaigns are provided to the relevant Cabinet sub-committee to inform Cabinet decision-making. Research reports are therefore considered Cabinet-in-Confidence and can only be released publicly with the written agreement of the government.

3.20 Infrastructure (also similar to DSS and Treasury in paragraphs 4.19 and 5.20 respectively) had not documented any consideration of whether the research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. Given the requirement in the Guidelines, the accountable authority should be making active decisions about whether to seek Ministerial permission for the publication of campaign related research for each campaign. The basis of the decision should be documented. The publication of research enhances transparency.

## Were the principles of the framework adhered to?

The BOF Phase 2 campaign complied with Principle 1 of the Guidelines and largely complied with Principles 2, 3, 4 and 5.

The campaign was relevant to government responsibilities and was presented in an accessible manner.

Campaign materials were not always presented in an objective and fair manner, with some campaign statements not accurately representing the Australian Government's level of involvement in some projects featured in advertising materials.

Advertising materials were free of political content. Public relations activities undertaken during Wave 1 were not consistent with advice provided to the ICC concerning instigation by, and references to, parliamentarians. Infrastructure did not undertake an assessment of whether the Wave 1 public relations activities were compliant with the Guidelines.

Infrastructure adequately demonstrated its justification for Wave 1 but did not adequately demonstrate its justification for Wave 2. The justification for Wave 3 did not take into account the performance against campaign objectives in the earlier waves. There was no long-term communications strategy for the Infrastructure Investment Pipeline or targets for performance against the campaign objectives.

Infrastructure did not negotiate a lower price for Wave 1 public relations despite agreeing to a contract for a reduced range of services compared to the services quoted. A number of public relations activities in Wave 1 were either paid for but not delivered, or delivered in insufficient time to be used.

In Waves 1 and 2 there was no documented analysis to support advice provided to the Secretary that ‘the campaign complied with all relevant laws, and all procurement policies and procedures for the tendering and commissioning of services.’ Infrastructure did not document value for money assessments for three of 14 procurements and did not report three of 14 contracts correctly on AusTender.

## Principle 1 — was the campaign relevant to Government responsibilities?

3.21 The campaign related to government programs. The Infrastructure Investment Pipeline<sup>101</sup> was announced in the 2018–19 Federal Budget and was expanded in subsequent budgets, as outlined in paragraph 3.2 and Appendix 5.

3.22 The campaign was intended to inform the public of government policies and provide information on government programs, which the 2014 Guidelines listed as ‘suitable uses for government campaigns’.

## Principle 2 — was the campaign presented in an objective, fair and accessible manner, and designed to meet the objectives of the campaign?

### Campaign statements

3.23 Paragraphs 20–21 of the 2014 Guidelines provided that:

- campaigns should enable the recipients of the information to distinguish between facts, comment, opinion and analysis; and
- where information is presented as a fact, it should be accurate and verifiable.

3.24 In Wave 1 and 2, the advertising materials typically included an acknowledgement of state or territory government partners in small text under the ‘Building Our Future’ logo. Examples of such instances are provided in Table 3.2 below.

**Table 3.2: Examples of statements from Wave 1 and Wave 2 advertising materials — with acknowledgement of state partner**

Advertising type	Statement	Reference to state government	Funding arrangements for projects mentioned
Press advertisement	‘The Australian Government is upgrading large sections of the M80 and the Monash Freeway. We’re also building the connecting North East Link <sup>a</sup> , to provide local motorists with better connections in and around Melbourne.’	‘In partnership with the Government of Victoria’ appeared under the ‘Building Our Future’ logo.	Australian Government funding: <ul style="list-style-type: none"> <li>• M80 Ring Road Upgrade — \$500 million out of \$1 billion (50%)</li> <li>• Monash Freeway Upgrade — \$683.8 million out of \$1.368 billion (50%)</li> <li>• North East Link — \$1.75 billion out of \$15.8 billion (11.1%).</li> </ul>
Press advertisement	‘The Australian Government is upgrading the M1 Pacific	‘In partnership with the Queensland Government’	Australian Government funding:

101 As noted in paragraph 3.3, BOF Phase 2 campaign materials referred to the Infrastructure Investment Pipeline as the ‘Infrastructure Investment Plan’ or the ‘Infrastructure Plan’.

Advertising type	Statement	Reference to state government	Funding arrangements for projects mentioned
	Motorway between Brisbane and the Gold Coast.'	appeared under the 'Building Our Future' logo.	<ul style="list-style-type: none"> <li>M1 Pacific Motorway Upgrade Program — Gateway Motorway/Pacific Motorway Merge — \$115 million out of \$195.3 million (58.9%)</li> <li>M1 Pacific Motorway Upgrade Program — Mudgeeraba to Varsity Lakes Upgrade — \$195 million out of \$218.5 million (89.2%).</li> </ul>
Press advertisement	'The Australian Government is delivering better road and rail connections in Sydney. Projects like WestConnex, NorthConnex and the Port Botany Rail Line are designed to ease congestion and cut travel times.'	'In partnership with the NSW Government' appeared under the 'Building Our Future' logo.	<p>Australian Government is funding:</p> <ul style="list-style-type: none"> <li>WestConnex — \$1.5 billion out of a total cost of \$16.8 billion (8.9%)</li> <li>NorthConnex — \$412 million out of a total cost of \$2.987 billion (13.8%)</li> <li>Port Botany Rail Line: <ul style="list-style-type: none"> <li>Port Botany Rail line duplication — contributing total cost \$400 million out of \$400 million (100%)</li> <li>Port Botany Rail line upgrade — stage 3 contributing total cost \$75 million out of \$75 million (100%)</li> <li>Port Botany to Kingsford Smith Airport and Mascot — \$10 million out of total cost of \$20 million (50%).</li> </ul> </li> </ul>

Note a: In Wave 2, this advertisement was changed to say 'We're also investing in the North East link'.

Source: ANAO analysis of Infrastructure documentation.

3.25 In Wave 3, there were no references to state or territory partners in advertising materials.<sup>102</sup> Examples are provided in Table 3.3 below.

**Table 3.3: Examples of statements from Wave 3 advertising materials — no reference to state/territory partner**

Advertising type	Projects featured	Statement	Reference to state or territory government	Funding arrangements for mentioned projects
Radio	Brisbane Metro	'We're adding two new dedicated busways in Brisbane to get you home sooner to the ones you love.'	Nil.	Australian Government funding: \$300 million out of \$1.244 billion (24%).

<sup>102</sup> Some public relations materials in Wave 3 included acknowledgement of state and territory government partners.

Advertising type	Projects featured	Statement	Reference to state or territory government	Funding arrangements for mentioned projects
Press	ACT Mitchell Light Rail stop	'We're modifying the existing Canberra Light Rail Stage 1 Project to include the construction of an additional light rail stop in Mitchell.'	Nil.	Australian Government funding: \$6 million out of \$12 million (50%).
Radio	Victoria M80 Ring Road	'We're upgrading Melbourne's M80 Ring Road to get you home sooner to the ones you love.'	Nil.	Australian Government funding: \$500 million out of \$1 billion (50%).
Press	Nowra bridge	'We're building a new four lane concrete bridge over the Shoalhaven River at Nowra, next to the existing bridges.'	Nil.	Australian Government funding: \$155 million out of \$310 million (50%).
Press	ACT Gundaroo Drive	'We are delivering a dual carriageway on Gundaroo Drive in the ACT, between Ginninderra Drive and the Barton Highway.'	Nil.	Australian Government funding: \$25 million out of \$54.5 million (45.9%).

Source: ANAO analysis of Infrastructure documentation.

3.26 As noted in paragraph 3.14, for Wave 1 and Wave 2, there was no documented verification of campaign statements provided to the Secretary as part of the certification process. Infrastructure provided the ANAO with evidence of consultation with relevant line areas regarding the accuracy of campaign statements and the presentation of projects featured in advertising materials for Wave 1 and Wave 2.

3.27 The Secretary's certification pack for Wave 3 included documented verification of campaign statements. The evidence presented in support of statements relating to the Infrastructure Investment Pipeline was not always accurate<sup>103</sup>, however the ANAO verified that these statements were correct. Some campaign statements in Wave 3 did not accurately represent the Australian Government's role in featured projects. Advertising materials in Wave 3 had no acknowledgement of state or territory delivery partners. Infrastructure advised the ANAO in October 2021 that:

The acknowledgement of state and territory partners was removed during the refinement stage to allow enough space for campaign messaging/creative elements and to ensure the best possible message cut-through.

The website was the main source of information supporting the campaign and each creative execution directed audiences to the website. The website contained project details and made it clear when projects were also funded by partners.

<sup>103</sup> Evidence supporting the total value of the Infrastructure Plan or the number of projects included referred to spending and project activity since 2013. The advertising materials related to funding from 2020–21 onwards and projects underway at the time.

## Recommendation no. 2

3.28 The Department of Infrastructure, Transport, Regional Development and Communications ensure all future communications that refer to Australian Government-funded infrastructure projects accurately describe the Australian Government's role in the projects.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

3.29 *The department will update campaign guidance to note that the Australia Government's role in infrastructure projects needs to be accurately reflected in any future advertising material.*

### Accessibility of campaign materials

3.30 Concept testing was conducted prior to the commencement of Wave 1, with tracking conducted after the campaign launch to examine whether the campaign was meeting its objectives. Campaign materials were concept tested for Wave 3 and addressed the three sub-groups targeted in Wave 3.<sup>104</sup>

3.31 All campaign waves addressed culturally and linguistically diverse (CALD) and Indigenous audiences. Campaign material was produced and disseminated in seven languages as recommended by the Master Media Agency (MMA) Universal McCann (UM).<sup>105</sup> Indigenous-specific advertising streams were used to disseminate information. For Wave 1 and 2 this was press, radio, video and display. For Wave 3 it was radio and digital social streams.

3.32 Campaign images included a reasonably diverse range of Australians in terms of age, gender and ethnicity.

### Principle 3 — was the campaign objective and not directed at promoting party political interests?

3.33 Campaign materials for each wave were presented in objective language and free of political argument, as required by paragraph 26 of the 2014 Guidelines. As required by paragraph 28 of the 2014 Guidelines, campaign materials did not:

- mention the party in Government by name;
- directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
- include party political slogans or images; or
- refer or link to the web sites of politicians or political parties.

3.34 The 2014 Guidelines also required that campaigns 'must not try to foster a positive impression of a particular political party or promote party political interests' or 'be designed to influence public support for a political party, a candidate for election, a Minister or a Member of

<sup>104</sup> Infrastructure documentation stated that women, Australians under 35 years of age and people in rural and regional areas were key sub-groups in the target audience for Wave 3.

<sup>105</sup> The languages were: Arabic, Cantonese, Greek, Italian, Korean, Mandarin and Vietnamese. These languages were identified as 'the top seven spoken in Australia'.

Parliament’.<sup>106</sup> On 14 December 2018, the Minister approved Wave 1 of the campaign to launch on 13 January 2019.<sup>107</sup> On 24 December 2018 there was a government decision for Infrastructure to redirect 15 per cent of the campaign media spend to ‘below-the-line’<sup>108</sup> (non-media) activities, specifically public relations and social media activities. In response, Infrastructure prepared a public relations brief and provided it to the government and the ICC. Infrastructure received advice from the ICC on 23 January 2019 that the campaign ‘was capable of complying’ with Principles 1 to 4 of the Guidelines, although details of the public relations activities were yet to be confirmed. Infrastructure subsequently approached five suppliers on the then mandatory Campaign Advertising Supplier Register (CASR) to select a public relations supplier. Infrastructure identified a preferred supplier (OPR Agency) and subsequently obtained the Minister’s approval for the following below-the-line activities:

- a movie roadshow;
- MP and Senator Toolkits;
- a ‘Consumer happiness’ survey;
- local case study short films;
- approaches to media outlets to place news stories (drawing on the survey and case studies);
- opinion editorials by the Minister<sup>109</sup>; and
- a keynote speaking opportunity for the Minister.

3.35 In documentation provided to the ICC on 23 January 2019, when seeking compliance advice regarding the public relations activities in Wave 1, Infrastructure stated that:

Public relations, social media and below-the-line activities undertaken for the campaign will not be instigated by any political party or politician, or make reference to any political party or politician.

3.36 The Minister and staff in the Minister’s office were involved in determining the final list of activities to be undertaken. Infrastructure’s initial list of activities did not include the movie roadshow. After consulting with the Minister’s office this activity was included.

3.37 Table 3.4 below outlines several public relations activities developed as part of Wave 1 of the campaign that were planned to involve the Minister and/or other parliamentarians or to produce materials for their use. The cost of these activities was met from the campaign budget (discussed further in Table 3.6).

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106 See paragraphs 27 and 28(d) of the 2014 Guidelines.

107 The communications strategy applicable at the time (dated 10 December) stated that the public relations activities would be undertaken in-house.

108 Below the line activities typically refer to communications activities that do not directly relate to paid placement of advertisements such as of television commercials and advertisements in newspapers, on radio or on social media, newspaper and radio.

109 In the response to the request for quote, this activity was presented by OPR Agency as opinion pieces by ‘industry and local government stakeholders ... that reflect on what each of the projects means to local communities, the local workforce and also how these investments will allow each community to tell their own growth story.’ No departmental documentation has been provided to the ANAO showing the reason for the change from this approach to producing opinion editorials in the Minister’s name.



**Table 3.4: Wave 1 public relations activities planned to involve the Minister and/or other parliamentarians or to produce materials for their use**

Activity	Purpose
MP and Senator Toolkits	Intended recipients were parliamentarians. OPR Agency's final report indicated that it undertook a 'political mapping' exercise but it is unclear how the MPs and Senators who were to receive a toolkit were to be selected and Infrastructure was unable to provide a list of intended recipients. The toolkits were developed as part of the campaign and funded from the campaign budget but were not distributed (see Table 3.6 for details). <sup>a</sup> The toolkits themselves did not reference politicians.
Movie roadshow	The Minister and other Coalition MPs and Senators attended movie roadshow events developed as part of the campaign and funded from the campaign budget.  The Minister prepared pre-recorded introductions for the events. The pre-recorded introductions were developed as part of the campaign and funded from the campaign budget but ultimately were not used (see paragraphs 3.41 and 3.42).
Approaches to media outlets to place news stories (drawing on the survey and case studies)	One of the media stories featured a Liberal Senator and a Liberal candidate for the 2019 Federal Election. <sup>b</sup>
Opinion editorials by the Minister	In the response to the request for quote, this activity was presented by OPR Agency as opinion editorials by industry and government leaders. Ultimately it was decided they would be published in the Minister's name. The reason for this decision was not documented by Infrastructure.
Speaking opportunities for the Minister	A planned keynote speech by the Minister. This did not occur (see Table 3.6 for details).

Note a: Infrastructure advised the ANAO in October 2021 that the toolkits were not distributed due to the election being called and the caretaker period commencing. The campaign end date was 13 April 2019 and the election was called on 11 April 2019.

Note b: Infrastructure advised the ANAO that according to its records neither individual was put forward as an interviewee for the story by the department.

Source: ANAO analysis of Infrastructure information.

**3.38** The public relations brief included in Infrastructure's January 2019 submission to the ICC stated that:

It is anticipated that the campaign may receive scrutiny in the media. To help mitigate this risk, the department will ensure the advertising campaign meets the principles [of the Guidelines] ...

The successful [public relations] supplier will be required to develop and implement a public relations strategy that includes ... issues and risk management in consultation with the Department.

3.39 Infrastructure did not document any assessment of whether the public relations activities it undertook complied with the Guidelines and there was no evidence of risk and issues management relating to the activities.<sup>110</sup>

3.40 In its 21 March 2019 submission to the ICC, where Infrastructure sought compliance advice relating to increasing the media spend for Wave 1 as part of the 'upweight' directed by the government (see paragraphs 3.65 to 3.69), Infrastructure repeated its advice that public relations activities 'will not be instigated by any political party or politician, or make reference to any political party or politician.' This was after the contract with the OPR Agency had been signed<sup>111</sup> and some of the activities (listed in Table 3.4) had already being delivered.<sup>112</sup>

3.41 On 19 March 2019 Infrastructure sought Finance advice relating to the pre-recorded introductions by the Minister for the movie roadshows referred to in Table 3.4 above.<sup>113</sup> Finance advised Infrastructure that:

In reviewing the proposal, in its entirety, it does raise some concerns from both a framework and communications perspective. The placement of a message from the Deputy Prime Minister within a paid campaign cinema event is problematic in respect to complying with the intent of the Guidelines. ... both Principle 3 and Infrastructure's submitted Statement Against the Principles are at odds with the currently proposed approach and as a result Finance cannot support the event going forward in its current form.

In addition, further consideration should be given to whether conducting these events, at all, will result in a net benefit for the campaign when factoring in potential criticism of the approach, which could detract from the campaign's ability to meet its communications objectives. If the cinema events are to proceed, Infrastructure should consult with OPR [Agency] and explore potential issues management strategies.

3.42 The movie roadshow events proceeded but Infrastructure did not use the pre-recorded Ministerial introductions at the events. There is no evidence of Infrastructure and OPR Agency working on issues management strategies.<sup>114</sup>

3.43 Other 'below-the-line' campaign activities included social media services provided by the supplier engaged to produce the campaign advertising materials and the campaign website. This included a social media strategy, content development and site moderation.<sup>115</sup>

3.44 No public relations activities were undertaken for Wave 2. Public relations activities undertaken in Wave 3 did not involve the Minister or other MPs or Senators.

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110 A risk assessment was documented in July 2018. This did not relate to the specific public relations activities that were selected in February 2019.

111 The contract was signed on 1 March 2019.

112 For example, the first movie roadshow event was held on 21 March 2019.

113 The pre-recorded Ministerial introductions had been created by OPR Agency prior to Infrastructure seeking advice from Finance on the suitability of using them in the movie roadshow events.

114 The Department advised the ANAO in October 2021 that issues and mitigations were identified as part of the contract with OPR.

115 These social media services are different to the paid social media advertising placements that occurred in Wave 3.

## **Principle 4 — was the campaign justified and undertaken in an efficient, effective and relevant manner?**

### *The need and justification for the campaign*

3.45 Infrastructure adequately demonstrated the justification for Wave 1 but not Wave 2. The justification for Wave 3 did not take into account the performance against campaign objectives in the earlier waves. No performance targets were established for any of the three waves and there is no evidence that Infrastructure considered alternatives to advertising as a means of achieving its communications objectives.

#### Wave 1

3.46 After the government agreed to the development of Wave 1, Infrastructure commissioned research to inform development of the campaign. The research reported on public attitudes to:

- government spending on different types of infrastructure;
- awareness of, and support for, the '10 Year Infrastructure Investment Plan'<sup>116</sup>;
- the relative importance research participants placed on different projects in their state or territory; and
- potential benefits and outcomes of infrastructure investment.

3.47 The research identified potential communications concepts for the campaign. The research report identified that consideration of key projects and the benefits of the '10 Year Infrastructure Investment Plan' led to significant increases in support for it.

3.48 Infrastructure's statement against the principles document for Wave 1 stated that 'research shows there is a need for a campaign due to a lack of awareness' of the Infrastructure Investment Pipeline. The statement against the principles referred to the research, which found that 13 per cent of respondents had 'definitely' heard of the Pipeline<sup>117</sup> and 31 per cent had 'maybe' heard of it.

#### Wave 2

3.49 The need for Wave 2 was not adequately demonstrated. As outlined in paragraph 3.6, Infrastructure's statement against the principles for Wave 2 described it as 'a maintenance burst' aimed at 're-establishing the BOF brand in the minds of the community and ... help[ing] ensure the previous gained increase in awareness is not eroded'. The document further stated that:

This two stage approach reflects analysis of campaign performance data from earlier in the year [wave 1] which recommended continuation of the campaign with some adjustments. Those adjustments will be reflected in Stage 2 and will leverage off the refamiliarisation of the public with the BOF brand and concepts, in Stage 1.

3.50 There was no documentation showing who had recommended a continuation of the campaign or why 'refamiliarisation with the BOF brand and concepts' was needed. An evaluation<sup>118</sup> of Wave 1 identified 'creative fatigue' and a decline in people taking action in response to seeing

116 In the developmental research, participants were asked 'Before today, have you heard about the Australian Federal Government's \$75 billion 10 Year Infrastructure Plan?'.

117 As noted in paragraph 3.3, BOF Phase 2 referred to the Infrastructure Investment Pipeline as the 'Infrastructure Investment Plan' or the 'Infrastructure Plan'.

118 For further discussion of the Wave 1 evaluation report, see paragraphs 3.83 to 3.94.

the advertising materials during the second half of Wave 1. Wave 2 commenced in November 2019, approximately seven months after the conclusion of Wave 1.<sup>119</sup> There was no evidence that Infrastructure considered the recommendation in the Wave 1 evaluation report that Infrastructure ‘consider increasing the length of time between phases (e.g. annually) to showcase project progress (i.e. “new news”) in order to build confidence in Federal Government’s ability to deliver on promises.’

3.51 The campaign objectives for Wave 1 and Wave 2 were the same and creative materials used in Wave 2 were largely the same as those used in Wave 1. The evaluation report for Wave 1 did not directly address all campaign objectives.<sup>120</sup> Therefore, Infrastructure was not able to assess whether Wave 1 was successful in meeting all of its objectives and consequently it was unclear whether Wave 2 would be an effective or efficient use of public resources.<sup>121</sup>

#### Wave 3

3.52 Infrastructure commissioned additional research to inform Wave 3. The research report was delivered in January 2020 and covered the same topics as the 2018 research (see paragraph 3.46). The research report stated that Infrastructure had ‘sought developmental research to inform the long term strategy for the campaign including the engagement approach and the level of community interest in information.’

3.53 The target audience for Wave 3 included ‘a particular focus on: those in regional areas, females and younger audiences’, which had been identified as being less engaged with campaign messaging in previous waves. However, the justification for Wave 3 was not informed by consideration of the overall performance of prior waves of the campaign against its objectives.<sup>122</sup>

3.54 Infrastructure’s statement against the principles in support of Wave 3 said that:

The 2019<sup>123</sup> developmental research demonstrated a general lack of awareness or confusion about the Australian Government’s investment in transport infrastructure at the state/territory and local levels ... Only 16 per cent of research participants had definitely heard of the Infrastructure Investment Program.<sup>124</sup>

3.55 The Wave 1 and Wave 2 evaluation reports<sup>125</sup> did not directly address the objective of ‘increased community knowledge of and confidence in the Government’s \$75/\$100 billion 10 year infrastructure plan’. The 2020 developmental research showed limited lasting increases in

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119 The original plan presented to the government was for a new wave to commence in September 2019.

120 This is discussed further in paragraphs 3.83 to 3.94.

121 Of the metrics presented in the statement against the principles supporting justification for Wave 2, all but two related to developmental research conducted prior to Wave 1. Two data points were presented from the Wave 1 evaluation report. These related to ‘understanding in relation to improving and maintaining roads and rail keeps people and communities connected’ and ‘confidence in the Australian Government’s ability to deliver on infrastructure promises to support national growth and prosperity.’

122 The primary objectives in Wave 3 were effectively the same as two of the objectives in Wave 1 and Wave 2. Campaign evaluations are discussed further in paragraphs 3.83 to 3.94.

123 ANAO comment: the developmental research commenced in 2019 but was reported on in January 2020.

124 ANAO comment: as noted in paragraph 3.12, in its Wave 3 documentation Infrastructure incorrectly referred to the Infrastructure Investment Pipeline as the ‘Infrastructure Investment Program’. The 16 per cent figure related to respondents in the developmental research who had ‘definitely’ heard of the Infrastructure Investment Pipeline. A further 29 per cent had ‘maybe’ heard of the Pipeline, producing a combined total of 45 per cent.

125 Campaign evaluation is discussed further in paragraphs 3.83 to 3.94.

awareness of the Pipeline after the first two Waves. As shown in Table 3.5 below, there were only slight improvements in awareness over time. In the course of the BOF Phase 2 campaign, Infrastructure did not set targets for awareness of the Pipeline.

**Table 3.5: Developmental research findings on awareness of the Infrastructure Investment Pipeline**

	June 2015 <sup>a</sup>	July 2018	January 2020
'Definitely' heard of the Infrastructure Investment Pipeline	16%	13%	16%
'Maybe' heard of the Infrastructure Investment Pipeline	32%	31%	29%
Combined 'definitely' and 'maybe'	48%	44%	45%

Note a: The 2015 developmental research was undertaken for Building Our Future phase one. The question asked in the 2015 developmental research related to awareness of the Infrastructure Investment Program.

Source: ANAO analysis of Infrastructure information.

3.56 The evaluation reports for Wave 1 and Wave 2 also did not adequately address the objective of 'increased knowledge of delivery of urban and regional infrastructure projects'. This meant it was unclear whether the BOF Phase 2 campaign was having an impact against this objective and whether, similar to the situation discussed in paragraph 3.51, further campaign activity would be an effective or efficient use of public resources.

3.57 Prior evaluations did adequately address the other objective, which was to 'build road users' understanding and knowledge of the benefits and impacts associated with transport infrastructure to individuals, communities and the nation via local infrastructure projects in their area.' While the evaluations showed high levels of awareness<sup>126</sup>, the impact of the BOF Phase 2 campaign on this was less clear.<sup>127</sup> These results were also replicated in the 2020 developmental research. Infrastructure did not set targets for metrics relating to this objective, making it unclear what impact an additional campaign wave was intended to have.

3.58 As discussed in chapter 2 (see paragraph 2.84), the ANAO observed that entities did not establish specific performance targets. Establishing, measuring and reporting against specific performance measures assists in assessing whether a campaign has achieved its objectives. This is particularly important to consider when multiple waves of a campaign are run, to ensure that undertaking another wave is a proper use of taxpayer funds and represents value for money.

126 For example, in the Wave 2 evaluation report, 81 per cent of respondents agreed or strongly agreed with the statement 'improved infrastructure is vital to support our nation' (83 per cent in Wave 1), while 81 per cent agreed or strongly agreed with the statement 'investment in roads and rail is vital to help ease congestion on roads and in our major cities and towns' (83 per cent in Wave 1).

127 The Wave 2 evaluation report described 'softening' attitudes towards infrastructure investment, however this was based on a small shift from 'strongly agree' to 'agree' or from 'agree' to 'neither agree nor disagree' in some metrics.

### Recommendation no. 3

3.59 When considering whether to continue an existing campaign, the Department of Infrastructure, Transport, Regional Development and Communications: assess the campaign's performance against its objectives; assess whether continuing a campaign represents proper use of taxpayer resources; and document the reasons for continuing the campaign.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

3.60 *The department will update its campaign guidance to clarify that an assessment of evaluation data should influence decisions about continuing campaigns, and that these decisions should be documented.*

3.61 Infrastructure did not have a communications strategy for the Infrastructure Investment Pipeline and there is no evidence that Infrastructure considered alternatives to advertising to build awareness of the Pipeline.<sup>128</sup> Given the level of expenditure on BOF Phase 2<sup>129</sup> and the department's inability to sufficiently determine whether all campaign objectives have been met, Infrastructure should develop a long term communications strategy for the Pipeline. Such a strategy should include communication objectives and performance targets aligned to each objective, and should be developed after considering the suite of available communications tools without being limited to campaign advertising.

### Recommendation no. 4

3.62 The Department of Infrastructure, Transport, Regional Development and Communications develop a long-term communications strategy for the Infrastructure Investment Pipeline. The communications strategy should include communication objectives and performance targets aligned to each objective and reference the communication methods that have been assessed as most effectively addressing the specified communications goals.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

3.63 *Over the next 12 months the department will develop a long term communications strategy to effectively and efficiently promote the Infrastructure Investment Pipeline.*

#### *Delivering the campaign in an efficient, effective and relevant manner*

##### Wave 1 media activity

3.64 Infrastructure could not adequately demonstrate that the medium and volume of all elements of advertising activities for Wave 1 were cost effective or justifiable. After receiving the proposed media plan from the MMA, Infrastructure directed the MMA to significantly increase expenditure on newspaper advertising. Expenditure was increased from \$1.66 million

128 Infrastructure advised the ANAO in October 2021 that it 'has a business-as-usual approach to promoting projects under the Building Our Future umbrella including events (e.g. sod-turnings, openings) and signage which form part of our agreements/arrangements with states and territories.'

129 At 31 August 2021, \$32.1 million (including GST) had been spent on BOF Phase 2. Expenditure on BOF Phase 1 totalled \$10.1 million (including GST).

(15.4 per cent of the total media spend) to \$4.13 million (30.7 per cent of the total media spend). Infrastructure advised the ANAO that the increase in spending was because 'print was the only channel that carried a more localised message for regional areas and additional insertions were planned to extend reach'.<sup>130</sup> Infrastructure decided that paid social media placements would not be part of Wave 1 due to the risk of a high number of negative comments.<sup>131</sup>

3.65 In March 2019 the government sought an 'upweight' in campaign spending and approved an additional \$1.1 million in media expenditure on 21 March 2019. Of the additional \$1.1 million, \$825,839 was allocated to newspaper advertisements and \$363,454 to radio advertisements. The updated statement against the principles, prepared for the 22 March 2019 ICC meeting, stated that:

Following the delivery of tracking research, from the mid-point of the campaign, the media buy will be re-profiled to reduce overexposure in areas where the campaign has been particularly effective and increase exposure to areas where additional advertising spend may help to raise awareness.

3.66 A separate briefing paper prepared for the 22 March 2019 ICC meeting stated that:

The department is seeking to direct funds from within the campaign budget into channels where the tracking results found there is a lower level of awareness of the Federal Government's infrastructure investment plan.

The revised media plan proposes to direct funds of around \$1 million, from within the current campaign budget to boosting two channels – radio and regional print – with the aim of increasing awareness outside metropolitan areas. This approach was developed on the advice of the master media agency [MMA], Universal McCann.

3.67 There is no evidence that Infrastructure sought advice from the MMA regarding the most appropriate approach to changing the media strategy in line with the campaign objectives.<sup>132</sup> At the request of the Minister<sup>133</sup>, Infrastructure asked the MMA to facilitate an additional two regional press advertisements per state and territory. Infrastructure identified 16 regional locations to receive these new newspaper advertisements. Infrastructure documentation prepared at the time stated that the areas were 'growth areas' but it was not clear what 'growth areas' meant or how targeting the specific locations supported campaign objectives. The final 16 targeted locations were not limited to regional locations.<sup>134</sup>

3.68 The mid-point tracking research reported lower campaign recognition among regional audiences in some states. There were no benchmarks or targets for reaching rural and regional audiences. The rationale for targeting two regional newspapers per state and territory was not documented. The tracking research identified mixed results between states in terms of campaign

130 The additional insertions were to enable print coverage to be extended across the entire campaign period.

131 As noted in paragraph 3.43, Infrastructure engaged a supplier to deliver social media services, which were separate to paid social media advertising placements.

132 Infrastructure advised the ANAO in October 2021 that 'The department relies on UM as the MMA to provide advice on the best, most efficient use of funds. UM did not advise that the additional press was an inefficient use of funds. In fact the media strategy ... states: "Although print readership has declined year-on-year, latest figures show that more than 1 in 3 Australians are reading print newspapers, making this channel vital to ensuring maximum reach of the campaign message."'

133 The request was dated 12 March 2019.

134 The 16 locations were: Launceston, Burnie, Toowoomba, Gold Coast, Kalgoorlie, Pilbara, Whyalla, Adelaide, Greater Western Sydney, Grafton, Alice Springs, Darwin, Ballarat, Warrnambool, Queanbeyan and Canberra.

recognition in regional areas.<sup>135</sup> Infrastructure also requested an increase in spending on advertising in the metropolitan press, regional radio and cinema. The basis for the decision to increase spending in the metropolitan press was not documented.

3.69 The 16 new newspaper advertisements were tailored to the specific locations. While the other Wave 1 newspaper advertisements referred to a specific project or projects in the state or territory the advertisement was run in, the new advertisements were framed around the targeted location.<sup>136</sup> The reason for this change in messaging was not documented.<sup>137</sup>

3.70 The media booking was revised again in April 2019, when campaign materials were amended to reflect 2019–20 Federal Budget changes, which amended the value of the Infrastructure Investment Pipeline to \$100 billion over ten years from 2019–20. At this time Infrastructure reduced the media spend and the proportion of spending on newspaper advertisements due to a break in advertising while materials were updated.

3.71 The mid-point tracking report showed the effectiveness of different media channels, with print advertising assessed as accounting for one percentage point of campaign reach.<sup>138</sup> No evidence has been provided to the ANAO that shows Infrastructure considered the relative effectiveness of different media channels, or established performance targets when making changes to the campaign strategy after the mid-point evaluation results.

3.72 An additional \$3.0 million in advertising expenditure was secured in March 2019 to extend the campaign for two weeks to ensure updated materials had additional time in market after the Federal Budget was handed down. The proposed increase in media expenditure did not eventuate as the caretaker period took effect on 11 April 2019 and campaign advertising activities ceased.<sup>139</sup>

#### Wave 1 public relations activities

3.73 As noted in paragraphs 3.34 to 3.43, Infrastructure commissioned a number of public relations activities during Wave 1, which ran from 13 January 2019 to 11 April 2019. The public relations brief and the approach to market documents stated that the objectives of the public relations activities were:

- Improve knowledge and understanding of the Government’s infrastructure investment plan with the target audience.

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135 For example, campaign recognition in regional areas in Queensland was 33 per cent, well above the figure for metropolitan Queensland (24 per cent).

136 For example, advertising about the Tasmanian Freight Rail Revitalisation project was targeted to Burnie in Tasmania and had the heading ‘Delivering for Burnie as part of the \$100 billion infrastructure plan’. The existing advertisements about the same project were targeted Tasmania-wide and had the heading ‘Investing in Tasmanian freight links as part of the \$100 billion infrastructure plan.’ This advertisement was an update after the Infrastructure Investment Pipeline had been increased from \$75 billion to \$100 billion during Wave 1.

137 Infrastructure advised the ANAO in October 2021 that ‘the wording ... was designed to target the town and ties back to some of the key campaign messages [such as] “getting you home sooner and safer”.’

138 Based on the MMA’s ‘Total Unduplicated Reach and Frequency’ (TURF) analysis. The TURF analysis estimated ‘the unique contribution of each media channel towards campaign recognition’. The TURF analysis in the Wave 1 final evaluation report (at the end of the campaign) showed print accounting for a two percentage point contribution to campaign awareness. The media performance report provided by the MMA at the end of Wave 1 did not provide any metrics in relation to newspaper advertisements.

139 The federal election was held on 18 May 2019.



- Inform and increase awareness amongst regional and urban audiences about projects and programs that form part of the Government's \$75 billion infrastructure plan.
- Inform, inspire and assist targeted transport and infrastructure stakeholders to distribute further information on projects and programs.

3.74 In its response to Infrastructure's request for quote for public relations activities, the selected supplier had included a broader range of activities than those included in the final contract.<sup>140</sup> Infrastructure did not negotiate a lower price based on the reduced services agreed. As a consequence, Infrastructure is unable to demonstrate that the procurement represented value for money.

3.75 A number of the public relations activities were either paid for but not used during the campaign, or were undertaken with minimal or no evidence that they contributed to Infrastructure delivering against the identified public relations objectives. As a consequence, Infrastructure is unable to demonstrate that procurement activity relating to those activities represented value for money. The details of the outputs from each of the public relations activities, and their cost to the campaign budget, is provided in Table 3.6 below.

**Table 3.6: Outputs from Wave 1 public relations activities and cost to campaign budget**

Activity	Cost (excluding GST) <sup>a</sup>	Activity/Output
MP and Senator Toolkits	\$55,565	Toolkits were provided to Infrastructure by OPR Agency on 10 April 2019. Infrastructure provided the toolkits to the Minister's office but has no documentation showing whether they were distributed. <sup>b</sup>
Movie roadshow	\$353,730	<p>Events were held in six locations across Queensland, NSW and Victoria. The combined attendance was 137 attendees. The dates, locations and attendance at these events were as follows:</p> <ul style="list-style-type: none"> <li>• 21 March 2019 at Coolangatta (65 attendees)</li> <li>• 22 March 2019 at Toowoomba (20 attendees)</li> <li>• 24 March 2019 at Ballina (18 attendees)</li> <li>• 28 March 2019 at Mt Annan (30 attendees)</li> <li>• 29 March 2019 at Ballarat (1 attendee)</li> <li>• 30 March 2019 at Torquay (3 attendees — cancelled due to adverse weather)</li> </ul> <p>Infrastructure advised the ANAO in October 2021 that the cost of each event is not itemised on invoices provided by OPR Agency.</p>

140 Activities that were included in the original quote but not in the final contract included: a 'Connecting Industry' roadshow, which involved visiting seven capital cities and 10 regional towns for media and community engagements associated with infrastructure projects; and 'Connecting Australians' webpage, featuring case studies, content from roadshow activities, press coverage, event listings and media and stakeholder resource. Additionally, the quote was for movie roadshows at 10 locations.

Activity	Cost (excluding GST) <sup>a</sup>	Activity/Output
'Consumer happiness' survey	\$58,680	This was referred to in pitches to media agencies for 'exclusive stories' made by OPR Agency — see 'approaches to media outlets to place news stories' below.
Short films showcasing local case studies	\$163,060	Four case studies were produced — one each for Toowoomba (Queensland), Apollo Bay (Victoria), Ballarat (Victoria) and Ballina (New South Wales). Case study films were used in the movie roadshow (Toowoomba and Ballina only), approaches to media outlets and in Infrastructure's social media posts.
Approaches to media outlets to place news stories (drawing on the survey and case studies)	\$30,000	Three media spots were obtained.
Opinion editorials by the Minister	\$14,920	Draft editorials were provided to Infrastructure on 3 April 2019. Infrastructure has no record of the editorials being submitted to newspapers.
A key note speaking opportunity for the Minister	\$36,160	Approaches were made for speaking opportunities but the timing did not meet the Minister's schedule.
Other costs (e.g. planning, administration and reporting)	\$86,850	Planning, administration and reporting.
<b>Total</b>	<b>\$798,965<sup>c</sup></b>	

Note a: Cost figures for the components of each activity were itemised in the contract between Infrastructure and OPR Agency.

Note b: Infrastructure advised the ANAO in October 2021 that the toolkits were not distributed due to the election being called and the caretaker period commencing on 11 April 2019.

Note c: Infrastructure also spent an additional \$90,712 (excluding GST) for BCM Partners to provide imagery for PR activities.

Source: ANAO analysis of Infrastructure information.

## Wave 2

3.76 Advertising undertaken in Wave 2 was consistent with recommendations by the MMA. This included a reduction in the proportion of expenditure on press advertisements, in line with a recommendation from the evaluation report for Wave 1.<sup>141</sup> As with Wave 1, there were no paid social media advertising placements in Wave 2 and there was no radio or cinema advertising or public relations activities.

## Wave 3

3.77 Recommendations from the Master Media Agency informed the mix of advertising channels for Wave 3. The media buy for Wave 3 was changed after the campaign had commenced in June

<sup>141</sup> See paragraph 3.92 and Appendix 6 for further details on Wave 1 evaluation recommendations.

2021, with \$534,336 in budgeted television advertising transferred to the Department of Health for the COVID-19 Vaccination campaign. Savings to the media plan were not reinvested, based on advice from the Master Media Agency that 'it would not be an efficient use of funds to do as so ... [because] all channels are currently at the optimum level of investment'.

3.78 Infrastructure described its approach to Wave 3 as being 'hyper-localised'. Wave 3 creative materials presented 'Hero Projects', the use of which was designed to 'communicate the personal relevance of infrastructure to the target audience'. Infrastructure advised the ANAO that the selection criteria for projects to feature in Wave 3 advertising materials was that projects had to be:

- Visibly in construction during the campaign period (April to end June 2021)
- A major project, considered a priority from a national perspective (including more than \$3 million of Australian Government funding)
- Considered a priority at a local state/territory level (this may be a mix of community need/impact and significant state government funding)
- Free of current issues or sensitivities.

3.79 Infrastructure also considered the mix of projects across states and territories and metropolitan and regional projects, with two additional Victorian projects added after the initial short list was developed (it had one Victorian project). Some states had no, or only limited, video advertising, despite Wave 1 and Wave 2 evaluation reports showing video advertising to be the main driver of campaign recognition.<sup>142</sup> States with no or limited video advertising had lower rates of campaign recognition than previous waves.<sup>143</sup> As discussed in paragraph 3.84, the evaluation report found that Wave 3 did not shift project awareness. Infrastructure advised the ANAO in October 2021 that:

... the advertising mix was recommended by Universal McCann based on their expert knowledge of media markets and target audiences. The media mix was created to avoid wastage and maximise reach for projects. It was not appropriate for all projects, given their geography, footprint and the available budget, to have video advertising.

## **Principle 5 — did the campaign comply with legal requirements and procurement policies and procedures?**

3.80 Paragraph 14 of the 2014 Guidelines required entities to provide a report to their Chief Executive on campaign compliance with Principle 5 of the Guidelines.

142 See paragraphs 3.92 to 3.94 and Appendix 6 for a discussion of campaign evaluation reports and implementation of recommendations.

143 Campaign reach in Wave 3 was 13 per cent in Tasmania (Wave 1 was 35 per cent, Wave 2 was 36 per cent), 17 per cent in South Australia (Wave 1 was 33 per cent, Wave 2 was 32 per cent), and 24 per cent in the ACT (combined ACT and NSW figure in Wave 1 was 31 per cent, Wave 2 was 28 per cent). The overall Wave 3 campaign reach was 30 per cent.

3.81 For Waves 1 and 2, Infrastructure provided advice to the Secretary that ‘the campaign complied with all relevant laws, and all procurement policies and procedures for the tendering and commissioning of services.’ However there was no documented advice supporting this assertion. For Wave 3, Infrastructure provided the Secretary with detailed advice that addressed the legal compliance requirements under Principle 5<sup>144</sup>, as well as advice from Infrastructure’s Corporate Procurement Team on compliance with procurement policies and procedures.

3.82 Paragraph 35 of the 2014 Guidelines required entities to follow procurement policies and procedures for the tendering and commissioning of services, and stated that there must be a clear audit trail regarding decision-making. For each procurement, the ANAO assessed Infrastructure’s compliance against selected key requirements of the Commonwealth Procurement Rules (CPRs).<sup>145</sup> Out of a total of 14 campaign-related procurements, Infrastructure did not document value for money assessments for three procurements and did not report three contracts correctly on AusTender.<sup>146</sup>

## Was the campaign evaluated to determine its effectiveness

Infrastructure benchmarked, monitored and evaluated each wave of the campaign. Evaluation reports after Wave 1 and Wave 2 did not adequately address all campaign objectives so Infrastructure has not been able to clearly demonstrate the campaign objectives were met for those waves. The Wave 3 evaluation report provided a clearer assessment of performance against the revised campaign objectives. Infrastructure adopted some of the recommendations made in evaluation reports from Wave 1 and Wave 2.

3.83 Paragraph 33 of the 2014 Guidelines provided that campaigns should be evaluated to determine effectiveness. Each wave of BOF Phase 2 was evaluated. The evaluation reports for Wave 1 and Wave 2 did not adequately address all campaign objectives, making it difficult for Infrastructure to assess whether the campaign met its objectives. Neither evaluation report directly addressed the first campaign objective.<sup>147</sup> The metrics relevant to the second objective were not

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144 Paragraph 34 of the 2014 Guidelines stated that:

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

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

145 The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days.

146 In Wave 1, two contract amendments for media placement were not reported on AusTender and the amendment for developmental research was published about 10 months after the amended contract was entered into.

147 This objective was: ‘Increased community knowledge of and confidence in the Government’s \$75/\$100 billion 10 year infrastructure plan’. The Infrastructure Investment Pipeline increased in value from \$75 billion to \$100 billion over ten years at the 2019–20 Federal Budget, which was announced during Wave 1.

sufficiently specific or reliable to enable an adequate assessment.<sup>148</sup> The assessment of performance against the third objective was more robust, and found that the campaign had limited impact against this objective.<sup>149</sup>

3.84 The Wave 3 Hall & Partners evaluation report provided a clearer assessment of performance against the campaign objectives. The evaluation report for Wave 3 concluded that:

As a campaign which intended to inform the public of major and local transport infrastructure projects, the latest round of Building Our Future campaign did not shift project awareness nor the associated benefits ...

It was apparent that the campaign was able to increase awareness that the Australian Federal Government was a source of funding.

With online search (led by website visitation) as the primary call-to-action, the response was solid in the campaign's initial stages but tapered as the campaign progressed.

3.85 The Hall & Partners evaluation report also reported on Wave 3 performance with the targeted audiences.<sup>150</sup> While reach with these audiences was found to be generally in line with prior Waves, there were increases in taking action in response to the campaign messaging.<sup>151</sup>

3.86 Infrastructure undertook a separate internal evaluation of Wave 3, which combined insights from the Hall & Partners evaluation and an evaluation of Wave 3 public relations activities.<sup>152</sup> The internal evaluation stated that 'it cannot be concluded that the campaign achieved all of its objectives.'

3.87 Infrastructure did not establish specific performance targets. To effectively evaluate performance, Infrastructure should ensure that all campaign communication objectives are measurable and that performance targets are developed and used to evaluate the achievement of campaign objectives.

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148 This objective was 'Increased knowledge of delivery of urban and regional infrastructure projects'.

149 This objective was 'Increased awareness of the benefits of investment to individuals, communities and the nation that come from infrastructure investment'.

150 These were: infrastructure users in regional and remote areas, females and those aged 18–34 years.

151 The evaluation report reported on whether respondents had:

- talked to friends or family about road and rail infrastructure project/upgrades;
- searched online for information about road and rail infrastructure projects/upgrades;
- thought about finding more information about road and rail infrastructure projects/upgrades;
- shared, liked or commented on road and rail infrastructure projects/upgrades on social media;
- visited the Building Our Future website; and
- made enquiries about road and rail infrastructure projects/upgrades.

152 This evaluation was undertaken by Wells Haslem Mayhew, the provider of public relations activities in Wave 3.

## Recommendation no. 5

3.88 The Department of Infrastructure, Transport, Regional Development and Communications ensure all campaign communication objectives are measurable and establish performance targets and report against them as part of campaign evaluation.

**Department of Infrastructure, Transport, Regional Development and Communications response:** *Agreed.*

3.89 *The department will update its campaign guidance to ensure measurable communication objectives and performance targets are set, and reported against.*

3.90 DSS and Treasury also did not establish specific performance targets (see paragraphs 4.47 and 5.56 respectively). As discussed in chapter 2 (paragraph 2.83), there is an opportunity for entities to engage with Finance and Hall & Partners to support improvements in the evaluation of campaigns to drive better outcomes.

### *Monitoring against media metrics*

3.91 Infrastructure conducted monitoring and in-flight evaluation activities during Phase 2 of the campaign. Specific and measurable key performance indicators (KPIs) were recommended by UM in the strategic media recommendation for each wave and these were reported in media performance reports (MPR) after the conclusion of each wave.<sup>153</sup> The MPR for each wave included lessons learned and recommendations against the various advertising channels, based on campaign performance against KPIs.

## Evaluation report recommendations

3.92 The evaluation reports for each wave included recommendations for future campaign activities. When the recommendations from Wave 1 and Wave 2 evaluation reports were not implemented there was not always documentation showing the reasons why (see Appendix 6).

3.93 The Wave 3 evaluation report contained five recommendations directed to Infrastructure:

- Consider maintaining national television advertisements as a key reach building device to support channels featuring localised content;
- Consider shorter periods of campaign activity;
- Create a stronger imperative to search for more information;
- Articulate the call to action more clearly in shorter videos; and
- Consider whether to use print advertising in any future campaign activity.

3.94 Infrastructure's internal evaluation of Wave 3 considered the campaign's performance and lessons learned for any future activities.<sup>154</sup>

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<sup>153</sup> The Wave 1 MPR did not include reporting against the delivery of press KPIs.

<sup>154</sup> This included consideration of the merits of the 'hyper-localised' campaign approach, the need for shorter advertising bursts and the requirement for longer lead times for key suppliers.

## 4. The Domestic Violence Support Services (Help is Here) campaign

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### Areas examined

This chapter provides an overview of the Department of Social Services (DSS) Domestic Violence Support Services (Help is Here) campaign and examines whether DSS complied with the Australian Government's campaign advertising framework when undertaking the campaign.

### Conclusion

The DSS Help is Here campaign was subject to the necessary review, certification and publication requirements. The campaign was relevant to Australian Government responsibilities and was presented in an objective, fair and accessible manner. Campaign messaging was not directed at promoting party political interests. The campaign was justified and undertaken in an efficient, effective and relevant manner, although DSS did not clearly document the justification for an additional burst of advertising. DSS sought advice on compliance with legal requirements and complied with procurement requirements for the campaign. The campaign was evaluated to determine its effectiveness.

### Recommendation and areas for improvement

The ANAO made one recommendation aimed at enhancing the effectiveness of campaign evaluation activity.

The ANAO also identified an opportunity for DSS to strengthen its certification arrangements by ensuring that the Secretary is provided with documentation supporting campaign verification.

4.1 Entities undertaking campaign advertising are required to comply with the Australian Government's campaign advertising framework (the framework). To examine whether DSS complied with the requirements of the framework the ANAO assessed DSS':

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

### Campaign overview

4.2 On 29 March 2020, the Australian Government announced a \$150 million package 'to support Australians experiencing domestic, family and sexual violence due to the fallout from coronavirus.'<sup>155</sup> The package included a new campaign 'to support those experiencing domestic violence over this [pandemic] period and to ensure those affected know where they can seek help.'<sup>156</sup>

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155 Prime Minister, Minister for Foreign Affairs and Women, Assistant Minister for Health, Minister for Families and Social Services, '\$1.1 billion to support more mental health, Medicare and domestic violence services', media release, Prime Minister of Australia, Canberra, 29 March 2020.

156 *ibid.*

4.3 The Domestic Violence Support Services Campaign, commonly referred to by its campaign slogan, 'Help is Here', was developed and administered by DSS. The campaign consisted of two waves:

- Wave 1 — the initial wave announced on 29 March 2020, which ran from 3 May 2020 to 3 October 2020; and
- Wave 2 — an additional wave added as an extension, which ran from 1 November 2020 to 30 January 2021.

4.4 DSS advised the ANAO that it considered running a third wave of the campaign when some Australian communities went back into lockdown over the course of 2021. DSS advised that the third wave did not go ahead, as at the time, key support services (1800RESPECT and MensLine Australia) had not reported any increase in contacts.<sup>157</sup> DSS further advised that it supplied promotional materials to national grocery retailers so they could display the posters used for the campaign in areas that had gone back into lockdown due to the re-emergence of coronavirus in the community.

4.5 The campaign was subject to the 2014 *Guidelines on Information and Advertising by non-corporate Commonwealth entities* (2014 Guidelines). Key elements of the Help is Here Campaign are summarised in Table 4.1 below.

**Table 4.1: Summary of the Help is Here campaign<sup>a</sup>**

Campaign summary	
Objectives	<p>The aim of the campaign was to ensure Australians affected by domestic and family violence know where they can access support services.</p> <p>The communication objectives of the campaign were to:</p> <ul style="list-style-type: none"> <li>• ensure Australians affected by domestic and family violence are seeking support from the relevant services;</li> <li>• raise awareness of the domestic violence support services available, and the specific support that can be provided;</li> <li>• ensure men who are perpetrating or are at risk of perpetrating domestic and family violence are seeking assistance to address their behaviour with the relevant services; and</li> <li>• raise awareness of support services available for family and friends of those experiencing domestic and family violence.</li> </ul>
Call to action	<p>The campaign material encourages those who are experiencing or at risk of experiencing or perpetrating family and/or domestic violence, as well as those who might know someone that is at risk of experiencing or perpetrating family and/or domestic violence, to contact MensLine Australia, 1800RESPECT and/or state based services.<sup>b</sup></p>
Timing	<ul style="list-style-type: none"> <li>• Wave 1: 3 May 2020 to 3 October 2020.</li> <li>• Wave 2: 1 November 2020 to 30 January 2021.</li> </ul>
Target audience	<p>Primary audiences — those who are experiencing or are at risk of experiencing or perpetrating family and/or domestic violence, as well as</p>

<sup>157</sup> DSS advised the ANAO that when the campaign initially commenced in 2020, both 1800RESPECT and MensLine Australia had seen increases in contacts as a result of the pandemic.



Campaign summary	
	<p>those who might know someone that is at risk of experiencing or perpetrating family and/or domestic violence.</p> <p>Secondary audience — all Australians over 18 years old.</p> <p>Specific targeting was conducted to address groups at greater risk of experiencing family or domestic violence, with specific targeting for groups most at risk. This includes women aged 15–34, people living in lower socioeconomic areas, remote and rural areas, Indigenous Australians and culturally and linguistically diverse (CALD) audiences.</p>
Advertising activities	<p>For both waves: television, radio, newspapers, magazines, out-of-home digital banners and digital display.</p> <p>For Wave 1 only, brand partnership integration and public relations activities.<sup>c</sup></p>
Total campaign budget (GST exclusive)	<p>\$21.4 million</p> <ul style="list-style-type: none"> <li>Wave 1: \$15.2 million</li> <li>Wave 2: \$6.2 million</li> </ul>
Total campaign expenditure (GST inclusive)	<p>\$23.2 million</p> <ul style="list-style-type: none"> <li>Wave 1: \$16.7 million</li> <li>Wave 2: \$6.6 million</li> </ul>
Media expenditure (GST inclusive)	<p>\$21.2 million<sup>d</sup></p> <ul style="list-style-type: none"> <li>Wave 1: \$14.7 million</li> <li>Wave 2: \$6.4 million</li> </ul>
Supplier expenditure (GST inclusive)	<p>Total: \$2.1 million</p> <p>Wave 1:</p> <ul style="list-style-type: none"> <li>Market research — Kantar Public: \$0.3 million.</li> <li>Evaluation Research — Hall &amp; Partners: \$0.3 million.</li> <li>Creative — BMF Australia: \$0.9 million.</li> <li>Public Relations — Fenton Communications: \$0.1 million.</li> <li>Multicultural marketing — Ethnic Communications: \$0.2 million.</li> <li>Indigenous communications — Fenton Communications: \$0.2 million.</li> </ul> <p>Wave 2:</p> <p>Evaluation research — Hall &amp; Partners: \$0.1 million.</p>

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

Note b: State based services advertised in the campaign material were Safe at Home Family Violence Response and Referral Line (Tasmania), Safe Steps (Victoria), Domestic Violence Crisis Service (Australian Capital Territory), NSW Domestic Violence Helpline (New South Wales), Domestic Violence Helpline (Western Australia), Domestic Violence Crisis Line (South Australia), DV Connect (Queensland), and Darwin Aboriginal and Islander Women's Services (Northern Territory).

Note c: DSS partnered with retail brands, The Iconic, Chemist Warehouse and Amazon, leveraging their collective networks to extend campaign messaging. Public relations activities included: developing stakeholder kits and providing them to relevant stakeholders, developing sharable content, and conducting outreach and engagement. See paragraphs 4.36 and 4.37 for details.

Note d: Finance's *Campaign Advertising by Australian Government Departments and Agencies Report 2020–21* reported a total media placement figure of \$19.1 million (GST exclusive). This figure only includes gross media

spend, which does not include other media-related expenses such as despatch fees, translation fees and subtitling.

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

## Campaign development and approval

4.6 To inform the campaign, DSS prepared a ‘desktop research’ report that outlined emerging ‘evidence of the specific impact of COVID-19 on family and domestic violence ... with credible reports of increases in violence in areas affected by the pandemic, including Australia’.

4.7 Wave 1 launched on 3 May 2020 and ran until 3 October 2020. Materials for Indigenous and culturally and linguistically diverse (CALD) audiences launched on 31 May 2020. The Minister subsequently approved the launch of Wave 2 on 22 October 2020. Wave 2 launched on 1 November 2020 and ran until 30 January 2021.

4.8 Ministers were involved prior to the commencement of both waves of the campaign. The government considered the campaign approach and timeline and agreed the communication strategy, the media plan, the creative materials and media placement.

## Campaign funding

4.9 As mentioned in paragraph 4.2, the campaign was part of a \$150 million package to support Australians experiencing domestic and family violence. The Help is Here campaign was allocated \$5 million from the package. The remainder of the \$15.2 million budget for Wave 1 was made up of: \$8 million reallocated to the campaign from underspends within the DSS portfolio; \$2 million reallocated from the planned Stop it at the Start campaign<sup>158</sup> that was due to run in April 2020; and \$200,000 reallocated from the National Initiatives.<sup>159</sup>

4.10 Funding for Wave 2, which totalled \$6.2 million, was allocated in the 2020–21 Federal Budget. This brought the total campaign budget to \$21.4 million (excluding GST).

## Were the necessary review, certification and publication requirements undertaken?

The Help is Here campaign was subject to the necessary review, certification and publication requirements. DSS did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. The Independent Communications Committee (ICC) reviewed the two waves. The Secretary’s certification was aided by a briefing pack which included ICC compliance advice and departmental advice on compliance with legal requirements.

## Review by the Independent Communications Committee

4.11 The Independent Communications Committee (ICC) first considered the campaign on 21 April 2020. The Committee met again on 16 September 2020 to consider an extension of the

<sup>158</sup> Stop it at the Start is Australia’s national primary prevention campaign that aims to contribute to a reduction in violence against women and their children. Stop it at the Start aims to help break the cycle of violence by encouraging adults to reflect on their attitudes and have conversations about respect with young people.

<sup>159</sup> The National Initiatives are Australian Government initiatives intended to achieve positive outcomes for families, women and their children by working across sectors to improve the safety and wellbeing of children, advancing gender equality and reducing violence against women and their children.

original campaign, which became Wave 2. The ICC concluded that both proposed waves of the campaign were 'capable of complying with Principles 1 to 4 of the Guidelines'.

4.12 For Wave 2, the ICC sought assurance from DSS regarding a number of aspects of the campaign, including: that the creative materials were still performing well and did not need to be altered; and that the campaign was performing well given the extenuating circumstances during the COVID-19 pandemic.

### **Secretary's certification**

4.13 For Wave 1 and Wave 2, DSS provided the Secretary with a briefing pack that included a Statement Against the Principles of the Guidelines<sup>160</sup>, ICC compliance advice, advice on compliance with legal requirements and the proposed advertising materials.

4.14 The briefings provided to the Secretary did not include documented verification of campaign statements.<sup>161</sup> The provision of documentation confirming that information has been verified as part of the certification process assists in providing greater assurance to the accountable authority that the campaign complies with the Guidelines. DSS advised the ANAO that 'advertising materials were reviewed and approved by the Family Safety Policy Branch and Deputy Secretary Families and Communities at numerous times during the campaign process' although no documentation of this was provided to the ANAO. DSS further advised the ANAO that:

... it will adopt this process [documented verification of campaign statements] for fact based information campaigns but this additional verification process would not be appropriate for behavioural campaigns that include conceptual, scenario based elements within the advertising, such as the Stop it at the Start campaign. For behavioural campaigns the department will continue the current verification process which provides details of evidence and quality controls associated with the due diligence activities applied in developing the campaigns.

4.15 Following receipt of the respective briefing packs, the DSS Secretary:

- certified Wave 1 on 28 April 2020. The relevant Minister approved the commencement of the campaign on 1 May 2020, two days before advertising started; and
- certified Wave 2 on 15 October 2020. The relevant Minister approved the commencement of the campaign on 22 October 2020, ten days prior to the advertising for Wave 2 starting on 1 November 2020.

4.16 There is an opportunity for DSS to strengthen its campaign certification process by ensuring the Secretary is provided with documentation supporting how it has verified the accuracy of factual statements made in advertising campaigns.

### **Publication processes**

4.17 For both Wave 1 and Wave 2, DSS published the Secretary's certification statements on its website (on 1 May 2020 and 30 October 2020 respectively). The Department of Finance (Finance) published the ICC's advice on its website, as required, after each wave of the campaign launched. DSS published the details of the advertising campaign in its 2019–20 and 2020–21 annual reports,

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160 A Statement Against the Principles is a document prepared by entities to provide their accountable authority (in this case the departmental Secretary) with advice on the campaign's compliance with the Guidelines.

161 Paragraph 21 of the 2014 Guidelines stated that 'Where information is presented as a fact, it should be accurate and verifiable.'

although the wording used in its 2019–20 annual report varied slightly from the wording required by the Public Governance, Performance and Accountability Rule 2014 (the PGPA Rule).<sup>162</sup>

4.18 Paragraph 17 of the 2014 Guidelines and paragraph 22 of the 2020 Guidelines state that Chief Executives/Accountable Authorities ‘will ensure that ... research reports for advertising campaigns with expenditure of \$250,000 or more are published on their entity web site following the launch of a campaign where it is appropriate to do so.’ Similar to Infrastructure and Treasury (discussed in paragraphs 3.19 and 5.19 respectively), DSS did not publish research reports relating to its advertising campaign on its website. All entities advised the ANAO that research reports conducted as part of government advertising campaigns are provided to the relevant Cabinet sub-committee to inform Cabinet decision-making. Research reports are therefore considered Cabinet-in-Confidence and can only be released publicly with the written agreement of the government.

4.19 DSS (also similar to Infrastructure and Treasury at paragraphs 3.20 and 5.20 respectively) had not documented any consideration of whether the research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. Given the requirement in the Guidelines, the accountable authority should be making active decisions about whether to seek Ministerial permission for the publication of campaign related research for each campaign. The basis of the decision should be documented. The publication of research enhances transparency.

## Were the principles of the framework adhered to?

DSS adhered to Principles 1, 2, 3 and 5 of the Guidelines and largely adhered to Principle 4:

The campaign was relevant to government responsibilities and was presented in an objective, fair and accessible manner. Campaign messaging was not directed at promoting party political interests. The campaign was justified and undertaken in an efficient, effective and relevant manner, although DSS did not clearly document the justification for an additional burst of advertising conducted during the 2020–21 holiday period. DSS followed the master media agency’s advice concerning media placement, sought advice on compliance with legal requirements, and complied with procurement requirements for the campaign.

### Principle 1 — was the campaign relevant to Government responsibilities?

4.20 DSS’s Statement Against the Principles for both Wave 1 and Wave 2 established that the campaign was directly related to government responsibilities. The Administrative Arrangements Order states that the department deals with matters that include community mental health and community support services and family relationships, family and children’s support services.

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162 Paragraph 17AH(1)(a) of the PGPA Rule requires that annual reports include a statement providing details of any advertising campaigns undertaken by the entity in the reporting period. Specifically, entities must include the following statement on advertising campaigns: ‘During [reporting period], [name of entity] conducted the following advertising campaigns: [names of advertising campaigns undertaken]. Further information on those advertising campaigns is available at [address of entity’s website] and in the reports on Australian Government advertising prepared by the Department of Finance. Those reports are available on the Department of Finance’s website, <https://www.finance.gov.au/>.’

DSS had reported the details of the Help is Here campaign but did not report with the exact wording required.

4.21 DSS records indicate that the campaign's intent was to 'disseminate scientific, medical or health and safety information'. This was consistent with the examples of suitable uses for government campaigns listed in the 2014 Guidelines.

**Principle 2 — was the campaign presented in an objective, fair and accessible manner and designed to meet the objectives of the campaign?**

*Campaign statements*

4.22 Paragraph 21 of the 2014 Guidelines provided that where information is presented as a fact, it should be accurate and verifiable. The ANAO's review of campaign materials and campaign statements indicates that they were compliant with Principle 2.

*Accessibility of campaign materials*

4.23 Imagery used in the campaign depicted genderless characters, in line with the trauma informed approach DSS used when designing the advertising materials. DSS advised the ANAO that materials were tested to ensure they were not 'triggering' for individuals and that 'a clinical review was also undertaken by experts in this space to ensure the advertising would not have adverse impacts on vulnerable audiences'. DSS further advised that no refinements were made to campaign materials between Wave 1 and Wave 2. Figure 4.1, below, shows examples of advertisements from the campaign.

**Figure 4.1: Examples of press advertisements used in the Help is Here campaign**



Source: Department of Social Services.

4.24 DSS sought to meet the needs of Aboriginal and Torres Strait Islander Australians by adapting mainstream advertising and procuring an Indigenous-specific communications provider. DSS sought to meet the needs of culturally and linguistically diverse (CALD) people by producing translated advertising material in 14 languages and targeting translated advertising material to CALD audiences.<sup>163</sup> DSS sought to reach remote, rural and regional audiences through regional media channels. In addition to this, DSS advised the ANAO that ‘all campaign advertising materials were closed captioned, and Auslan versions of the advertisements were developed’.

4.25 Campaign materials were concept tested with the target audience and found to be engaging and relevant.

### **Principle 3 — was the campaign objective and not directed at promoting party political interests?**

4.26 DSS’s Statement Against the Principles for both phases advised the Secretary that Domestic Violence Support Services campaign materials were ‘free from political interests and [do] not contain any party political themes, messages or content.’

4.27 As required by paragraph 28 of the 2014 Guidelines, the campaign materials did not:

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

### **Principle 4 — was the campaign justified and undertaken in an efficient, effective and relevant manner?**

#### *The need for the campaign*

4.28 From January 2020, in response to concerns regarding COVID-19, the Australian Government and state and territory governments have progressively introduced a range of measures intended to slow the outbreak of COVID-19 in Australia by reducing community transmission of the virus. These measures have included social distancing, restricting peoples’ movement and encouraging them to stay at home.

4.29 Desktop research conducted by DSS in the campaign’s developmental stage indicated that:  
... while robust evidence is not yet available, reports and anecdotal evidence from multiple countries, including China and the United States, show that domestic violence is increasing and intensifying during the current COVID-19 global pandemic.

4.30 DSS records further indicate that ‘a range of evidence suggests that in times of crisis, rates of domestic and family violence increase’. Additionally, it was noted that ‘in Australia, services and

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163 The languages were Arabic, Cantonese, Farsi, Greek, Hindi, Italian, Korean, Mandarin, Punjabi, Spanish, Tagalog, Tamil, Thai and Vietnamese.

domestic violence advocates are already noticing an increase in women accessing support for domestic and family violence’.

4.31 Part of the \$150 million package referred to in paragraph 4.2 went toward funding 1800RESPECT and MensLine, which are telephone and online counselling services intended to support people in times of need. DSS advice to the Secretary, in its Statement Against the Principles for the first wave of the campaign, outlined that the aim of the campaign was to ensure Australians affected by domestic and family violence knew where they could access support services and aimed to direct people to 1800RESPECT, MensLine and local state/territory domestic violence services ‘to provide support to Australians experiencing or at risk of domestic and family violence’.

4.32 In its Statement Against the Principles for Wave 2, DSS repeated its advice that anecdotal evidence indicated that domestic violence had increased and intensified during the COVID-19 pandemic. It also referenced a study conducted by the Australian Institute of Criminology that for many women, the pandemic coincided with the onset of escalation of violence or abuse.<sup>164</sup>

4.33 DSS did not clearly document the justification for Wave 2. The justification presented in the Statement Against the Principles for Wave 2 chiefly focused on the need to address the impacts of the COVID-19 pandemic, whereas the briefing to the Minister seeking approval to commence Wave 2 states that the additional wave was intended ‘to help address the increased instances of domestic and family violence typically seen during the Christmas and New Year period.’<sup>165</sup>

4.34 Prior to proceeding with Wave 2, DSS advised the Minister that a further wave of Help is Here was ‘a high-risk proposition’ for reasons related to the prospects for increasing campaign awareness, the existence of other domestic violence campaigns at the time, the crowded nature of the market in the holiday season, the relevance of the COVID-19 specific messaging in the campaign given communities were emerging from lockdown, and the lack of funding.<sup>166</sup> Wave 2 was ultimately conducted during the holiday period, from 1 November 2020 to 30 January 2021. DSS advised the ANAO on 2 August 2021 that:

The department had discussion[s] regarding the timing for the holiday burst of activity. The burst was run to help address the increased instances of FDV [family and domestic violence] typically seen during the holiday period. Noting that the December/January advertising period is crowded and very costly, the department made the decision to commence the burst in November when advertising space is generally more available to embed the message in the market before the crowded December/January advertising period. The burst ran until 31 January<sup>167</sup> so that all of [the] school holidays were captured by the burst, typically a time where people spend more time with their family and instances of FDV are known to increase. It was also discussed that people may be feeling other pressures from the pandemic which may be impacting on their mental health and financial situation so another burst of advertising would be beneficial. Also we could not predict

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164 Australian Institute of Criminology, *The Prevalence of Domestic Violence among Women during the COVID-19 Pandemic*, July 2020.

165 The Statement Against the Principles for Wave 2 also referred to research that public holidays were linked to increased rates of violence. In particular, it referred to the Australian Institute of Health and Welfare’s 2018 report *Family, domestic and sexual violence in Australia*, that identified that public holidays such as Christmas and New Year have been linked to increased rates of violence.

166 Additional funding for the campaign was secured in the 2020–21 budget process.

167 ANAO comment: documentation shows that the end date was 30 January 2021.

when lockdowns would occur and were concerned that given the increase in socialising over the holiday period there was a high chance that states would have to again enter lockdown.

Additionally through discussions with states, the department was aware that a number of states were not running ads, and with the department not running *Stop it at the Start*, we were cognisant of a lack of messaging and wanted to ensure that messaging was reaching the audience.

### *Delivering the campaign in an efficient, effective and relevant manner*

4.35 Principle 4 of the 2014 Guidelines provides that the medium and volume of the advertising activities should be cost effective and justifiable within the budget allocated to the campaign. Recommendations from the Master Media Agency (Universal McCann, UM) informed the mix of television, radio, print and digital advertising channels. UM developed a media plan which considered how to disseminate domestic violence support service information in a COVID-19 environment where people may be isolated at home, and how to address key audiences effectively within the budget.

4.36 For Wave 1, DSS engaged a public relations agency to undertake stakeholder outreach for the campaign. Public relations activities included developing and distributing a stakeholder kit that included a tailored covering letter inviting support and a newsletter article<sup>168</sup>; and developing and distributing an audio news release to regional media.<sup>169</sup>

4.37 DSS also partnered with retail brands identified by UM to extend the reach of the campaign.<sup>170</sup> The media performance report noted that this activity ‘delivered a large amount of added value to the campaign’ and that ‘activity reached potentially at-risk target segments in moments they may be alone’. All activities quoted were delivered. Public relations activities were not undertaken in Wave 2.

4.38 Evaluation and advice from UM found that radio advertising was not cost effective for the campaign’s target audience. Radio advertising was not prioritised for Wave 2.

### **Principle 5 — did the campaign comply with legal requirements and procurement policies and procedures?**

4.39 Paragraph 14 of the 2014 Guidelines required entities to provide a report to their Chief Executive on campaign compliance with Principle 5 of the Guidelines. DSS sought advice for the Secretary from its Legal Services Branch for Wave 1 of the campaign. The advice stated that ‘on the information provided, the advertising materials to be used in the Campaign (the Materials) will likely satisfy the legal requirements described in Principle 5 of the Guidelines.’ For Wave 2, DSS advised the ANAO that ‘additional advice was not officially sought ahead of the second wave of advertising, as no new procurement activity had been undertaken since the previous advice’. The advice

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168 The evaluation report stated that ‘35 councils across all states and territories support[ed] the campaign in some form’. Examples of support included using materials provided in stakeholder toolkits when making social media posts and in articles included in community bulletins and news articles.

169 The evaluation report stated that this audio news release was broadcast on ‘at least 12 radio programs’.

170 The Iconic, an internet retailer, distributed flyers with its deliveries, in addition to publishing an editorial blog post and social posts. Amazon, another internet retailer, delivered flyers in shipment boxes from its distribution centres in Sydney, Melbourne and Perth. Chemist Warehouse, a pharmacy retailer, produced discrete in-store ‘wobblers’ in aisles specifically targeting women and men to showcase domestic violence support services, in addition to publishing campaign messaging in its monthly print publication.



provided to the Secretary as part of the briefing packs for Wave 1 and Wave 2 was therefore the same.

4.40 Paragraph 35 of the 2014 Guidelines required entities to follow procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers, and stated that there must be a clear audit trail regarding decision-making. DSS procured a range of services for the delivery of the Help is Here campaign, including: creative development and dispatch; Indigenous creative development; culturally and linguistically diverse creative development; market and social research; public relations services; benchmarking, tracking and evaluation research through the whole-of-government providers; and media placement services through the government's master media agency. The ANAO found a clear audit trail for DSS decisions around the commissioning of services and the engagement of suppliers for the campaign.

4.41 DSS conducted sole source limited tender procurements to engage the various suppliers. The suppliers approached to quote for services were selected due to their 'previous experience on the subject of domestic and family violence, and their proven ability to deliver high quality services within a specified timeframe and budget'. All the suppliers had previously worked for DSS on the Stop it at the Start campaign and were sourced from Finance's Campaign Advertising Supplier Register (CASR). Selection of suppliers from the CASR was mandated by Finance.<sup>171</sup> For each procurement, the ANAO assessed the department's compliance against selected key requirements of the Commonwealth Procurement Rules (CPRs).<sup>172</sup> DSS was found to be compliant.

## Was the campaign evaluated to determine its effectiveness?

Help is Here was evaluated to determine effectiveness. The evaluation indicated that the campaign was effective in raising awareness of available domestic violence support services.

The Media Performance Report reported against most key performance indicators identified at the beginning of the campaign. DSS monitored week to week changes in attitudes toward domestic violence and knowledge of domestic violence support services available for the duration of Wave 1 and conducted monthly tracking for Wave 2. DSS also monitored contact rates to key support services, 1800RESPECT and MensLine Australia.

4.42 Paragraph 33 of the 2014 Guidelines stated that campaigns should be evaluated to determine effectiveness. Hall and Partners<sup>173</sup> provided a campaign evaluation report in March 2021 which stated that:

Awareness and understanding of 1800RESPECT, MensLine and related state services all increased since the launch of the campaign and broadly held up throughout the campaign. Key perceptions were mostly stable throughout Burst 1, however Burst 2 saw slight declines in perceptions of unacceptability of domestic violence, availability and ease of seeking support, and perceptions

171 The CASR was a multi-use list. It was replaced in March 2021 by the Government Communications Campaign Panel.

172 The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days.

173 Hall and Partners Pty Limited is the whole-of-government provider for campaign benchmarking, tracking and evaluation.

that the Australian Government is providing support. The fact that these declines were mainly seen among those who had not seen / heard the campaign suggests that the campaign being on air during November to January may have held up these perceptions from an even further decline.

4.43 As indicated in Table 4.1 (above), the campaign's communication objectives were as follows:

1. to ensure Australians affected by domestic and family violence are seeking support from the relevant services;
2. to raise awareness of the domestic violence support services available, and the specific support that can be provided;
3. to ensure men who are perpetrating or are at risk of perpetrating, domestic and family violence are seeking assistance to address their behaviour with the relevant services;
4. to raise awareness of support services available for family and friends of those experiencing domestic and family violence.

4.44 DSS records indicate that Help is Here raised awareness of domestic violence support services available, and the specific support that can be provided, in line with objectives 2 and 4. The campaign evaluation report indicated that awareness of 1800RESPECT rose from 29 per cent (the pre-campaign benchmark in April 2020) to 43 per cent in January 2021, peaking at 46 per cent in September 2020. Awareness of MensLine rose from 22 per cent (the April 2020 benchmark) to 39 per cent in January 2021, peaking at 41 per cent in September 2020. Additionally, awareness of state services rose from 23 per cent (the April 2020 benchmark) to 28 per cent in January 2021, peaking at 33 per cent in September 2020.

4.45 The metrics included in the evaluation report did not directly measure campaign communication objectives 1 and 3. The wording of objectives 1 and 3 made measuring performance against them challenging due to the inclusion of the word 'ensure'. DSS acknowledged this difficulty in the course of the audit.<sup>174</sup> DSS advised the ANAO in October 2021 that:

... monthly contacts to 1800RESPECT increased during the Help is Here campaign starting at 23,555 contacts in April 2020, peaking at 31,734 contacts in August 2020 and tapering back to 21,629 contacts in February 2021. The demand for MensLine services was variable, but overall remained strong, during 'The Help Is Here' campaign.

4.46 Metrics relating to campaign impact were adopted. The evaluation report indicated that:

The launch of the campaign saw significant increases in most actions since the benchmark including the key actions of visiting the website, thinking about accessing support and making enquiries about available support. Campaign related actions mainly increased among 'at risk' males, while remaining broadly stable among 'at risk' females.

4.47 DSS did not establish specific performance targets. Neither did Infrastructure and Treasury (see paragraphs 3.87 and 5.56 respectively). To effectively evaluate performance, DSS should ensure that all campaign communication objectives are measurable and that performance targets are developed and used to evaluate the achievement of campaign objectives. As discussed in chapter 2 (see paragraph 2.83), there is also an opportunity for entities to engage with Finance and Hall & Partners to support improvements in the evaluation of campaigns to drive better outcomes.

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174 DSS advised the ANAO in October 2021 that Hall and Partners only evaluates Australian Government campaigns against reach, impact and engagement metrics, whereas objectives 1 and 3 relate to contacts to the 1800RESPECT and MensLine Australia support services, which were monitored by DSS.

## Recommendation no. 6

4.48 The Department of Social Services ensure that all campaign communication objectives are measurable and establish performance targets and report against them as part of campaign evaluation.

**Department of Social Services response:** *Agreed.*

4.49 The department will engage with the Department of Finance and the Whole of Government evaluation research provider Hall & Partners to ensure that campaign communication objectives are measurable and where possible set performance targets based on data provided by Hall & Partners.

### *Monitoring against media metrics*

4.50 DSS conducted monitoring and evaluation activities during both waves of the campaign and after it had finished. Specific and measurable key performance indicators (KPIs) were recommended by UM in the strategic media recommendation. While the majority of the 22 recommended KPIs were reported consistently between the initial strategic media recommendation, media performance report (MPR) and MPR one-page summary, there were inconsistencies with the wording of how some KPIs were reported across these documents, making it difficult to fully evaluate the success of all media channels.

4.51 As noted in paragraph 4.38, radio advertising was not prioritised for Wave 2. DSS did not update the KPIs in its media strategy to reflect this change. The final MPR produced by UM reported that all planned KPIs were met for Wave 1 and most were met for Wave 2.

4.52 The MPR included lessons learned and recommendations against the various advertising channels, based on campaign performance against KPIs. The report demonstrated consideration of not just the aspects of the campaign that performed well, but also of underperforming areas of the campaign. It included recommendations for how these could be improved in future campaigns.<sup>175</sup>

4.53 DSS advised the ANAO in October 2021 that the full monthly tracking reports were not routinely distributed outside of the department but reports were used to inform a number of documents, such as departmental Senate Estimates briefs. Results were also used to provide updates to the Minister's office and the Implementation Executive Group which includes state and territory government representatives. DSS further advised that some tracking reports were provided to the Minister's office on request.

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175 Some learnings and recommendations related to the unforeseen circumstances of the coronavirus pandemic. For example, due to social distancing regulations, many individuals' behaviours and patterns of movement changed. As a result, the campaign was planned around small digital format panels in restrooms, retail and health environments. In addition, during the pandemic many regional publications ceased printing and had to be cancelled and many community publications ceased from 30 June 2020.

## 5. The Economic Recovery Plan campaign

### Areas examined

This chapter provides an overview of the Department of the Treasury (Treasury) Economic Recovery Plan campaign and examines whether Treasury complied with the Australian Government's campaign advertising framework when undertaking the campaign.

### Conclusion

The Treasury's Economic Recovery Plan campaign was subject to the necessary review, certification and publication requirements. The campaign was: relevant to Australian Government responsibilities; presented in an objective, fair and accessible manner; not directed at promoting party political interests; and justified and undertaken in an efficient, effective and relevant manner. Treasury obtained advice on compliance with legal requirements and complied with procurement requirements for both phases with the exception of two contract notices (from a total of eight) that were not reported on AusTender within 42 days as required. Phase 1 of the campaign was evaluated to determine its effectiveness. Phase 2 was not evaluated for effectiveness as the campaign was paused on 1 July 2021 due to COVID-19 lockdowns. At the time this report was prepared (November 2021), the campaign remained paused.

### Recommendation

The ANAO made one recommendation aimed at enhancing the effectiveness of campaign evaluation activity.

5.1 Entities undertaking campaign advertising are required to comply with the Australian Government's campaign advertising framework (the framework). To examine whether Treasury complied with the requirements of the framework the ANAO assessed Treasury's:

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

### Campaign overview

5.2 On 22 September 2020, the government agreed to provide Treasury with \$15 million in 2020–21 for the Economic Recovery Plan (ERP) campaign. The campaign aimed to communicate 'the Australian Government's approach to economic recovery, informing target audiences of new and recently announced policies and providing information about programs and services to which they may be entitled'. This phase of the campaign ran from 14 October 2020 to 19 December 2020.

5.3 On 4 May 2021, the government agreed to provide \$15 million to develop and implement a second phase of the campaign. Treasury documentation indicates that the aim of Phase 2 was to 'inform the Australian community of the continuation of the Government's plan for economic recovery and in turn build consumer and business confidence'.<sup>176</sup> Phase 2 was scheduled to run from 6 June 2021 to 31 October 2021. Due to the COVID-19 lockdown in Victoria at the time that

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176 Treasury advised the ANAO in October 2021 that the second phase of the ERP campaign was funded to promote new measures announced under the plan to further support economic growth and confidence. A number of these measures were announced as part of the 2021–22 Federal Budget, after the first phase of the campaign was completed.

advertising was to commence, Treasury did not launch campaign materials in Victoria.<sup>177</sup> Television and out of home advertising materials were not to go live nationally until July 2021, to allow for critical information on vaccines to be rolled out in June 2021. All campaign advertising was paused on 1 July 2021 after New South Wales also entered a lockdown period.<sup>178</sup> As at 26 October 2021, the campaign remained paused.<sup>179</sup>

5.4 Phase 1 of the campaign was subject to the 2014 *Guidelines on Information and Advertising by non-corporate Commonwealth entities* (the 2014 Guidelines). Phase 2 was subject to the 2020 *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* (2020 Guidelines).<sup>180</sup> Key elements of the ERP campaign are summarised in Table 5.1 below.

**Table 5.1: Summary of the Economic Recovery Plan campaign**

Campaign summary	
Objectives	<p><b>Economic Recovery Plan Phase 1</b></p> <p>The aim of the campaign was to set and communicate a clear narrative of the Government's plan for economic recovery, focusing on explaining how the economic measures will impact individuals and their families, particularly how they support getting people back in to work.</p> <p>The communication objectives were to:</p> <ul style="list-style-type: none"> <li>• communicate that the Australian Government has a plan for economic recovery;</li> <li>• reinforce the benefits and importance to Australians of rebuilding and repairing the economy;</li> <li>• build confidence in the Australian and business community that there are steps being taken for economic recovery to stimulate employment opportunities and financial security;</li> <li>• develop an understanding of how the suite of measures being put in place will work together to stimulate economic recovery; and</li> <li>• direct audiences to the campaign website <a href="http://www.ourcomeback">www.ourcomeback</a> to find out more information.</li> </ul> <p><b>Economic Recovery Plan Phase 2</b></p> <p>The aim of the campaign was to inform the Australian community of the continuation of the Government's plan for economic recovery and in turn build consumer and business confidence.</p> <p>The communication objectives of the campaign were to:</p> <ul style="list-style-type: none"> <li>• inform the public the government has a plan for economic recovery and that the plan is working;</li> </ul>

177 Due to the lockdown in Victoria, small business radio, press, cinema and online did not launch.

178 Treasury advised the ANAO in October 2021 that paid search was planned to continue until 31 October 2021. Paid search is a demand-led channel, meaning that advertisements show to people actively searching online for information related to the Economic Recovery Plan.

179 In October 2021 Treasury advised the ANAO that a re-launch date had not yet been established and there were no plans to recommence advertising for this campaign while states were in lockdown. Treasury further advised that the COVID-19 outbreaks across the country meant that further research was required to understand the information needs of the community and business.

180 Phase 1 of the campaign was subject to the 2014 Guidelines as development had commenced prior to release of the 2020 Guidelines.

Campaign summary	
	<ul style="list-style-type: none"> <li>• inform the public what the plan is and how it benefits the country;</li> <li>• reinforce the benefits and importance of a strong and healthy economy for all Australians;</li> <li>• increase awareness and understanding of the government's continued plan for sustained economic recovery due to the COVID-19 pandemic;</li> <li>• increase confidence in the economy among individuals and the business sector by outlining initiatives that will be helping continue the recovery;</li> <li>• increase the likelihood and intention of individuals to participate in the economy through increased spending and investing;</li> <li>• increase the likelihood and intention of businesses to participate with the Australian economy through increased job creation and investment; and</li> <li>• encourage audience engagement with the campaign website.</li> </ul>
Call to action	Encourage targeted audiences to go to the website for more information.
Timing	<p>Phase 1: 14 October 2020 — 19 December 2020.</p> <p>Phase 2: scheduled for 6 June 2021 — 31 October 2021 but paused on 1 July 2021 due to COVID-19 lockdowns.</p>
Target audience	<p><b>Primary Audience</b></p> <p>Phase 1:</p> <ul style="list-style-type: none"> <li>• Australians aged 18 years and above including culturally and linguistically diverse (CALD) and Indigenous Australians and people with disability; and</li> <li>• Australian businesses.</li> </ul> <p>Phase 2:</p> <ul style="list-style-type: none"> <li>• All Australians in metropolitan, regional and rural areas (across all socio-economic backgrounds); and</li> <li>• Australian businesses, including small, medium and large businesses.</li> </ul> <p><b>Special audiences</b></p> <ul style="list-style-type: none"> <li>• Australians from a non-English speaking background;</li> <li>• Indigenous Australians; and</li> <li>• people with a disability.</li> </ul>
Media channels/advertising activities	For both phases: television, newspapers, radio, keyword targeted search, cinema, out-of-home, digital social, digital display, digital video, and video mobile were used.
Total campaign budget (excl. GST)	<p>\$30.0 million</p> <ul style="list-style-type: none"> <li>• Phase 1: \$15.0 million.</li> <li>• Phase 2: \$15.0 million.</li> </ul>
Total campaign expenditure (inc. GST)	<p>\$17.3 million</p> <ul style="list-style-type: none"> <li>• Phase 1: \$14.2 million.</li> <li>• Phase 2: \$3.1 million (as at 30 September 2021).</li> </ul>
Media expenditure (inc GST)	<p>\$14.8 million</p> <ul style="list-style-type: none"> <li>• Phase 1: Universal McCann \$12.7 million.<sup>a</sup></li> <li>• Phase 2: Universal McCann \$2.1 million (to 30 September 2021).</li> </ul>

Campaign summary		
Supplier expenditure (inc GST)	Phase 1	Total: \$1.5 million <ul style="list-style-type: none"> <li>• Development Research — Kantar Public (Kantar) \$0.1 million.</li> <li>• Evaluation Research — Hall &amp; Partners \$0.3 million.</li> <li>• Creative — TBWA (Melbourne) \$1.1 million.<sup>b</sup></li> </ul>
	Phase 2 (to 30 September 2021)	Total: \$1.0 million <ul style="list-style-type: none"> <li>• Development Research — Kantar Public \$0.1 million.</li> <li>• Evaluation Research — Hall &amp; Partners \$0.2 million.</li> <li>• Creative — TBWA (Melbourne) \$0.7 million.</li> </ul>

Note a: Treasury's 2020–21 Annual Report reported media expenditure as \$12,611,170 for Phase 1. This only includes amounts paid by Treasury during the 2020–21 financial year.

Note b: Creative pitch fees of \$15,000 were also paid to DDB Sydney and Clemenger BBDO.

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

### *Campaign development and approval*

5.5 Treasury developed two advertising campaigns relating to the COVID-19 pandemic: the ERP campaign and the COVID-19 Economic Response campaign. The latter is not included in the scope of this audit.<sup>181</sup> Monitoring data from that campaign was one of the components Treasury used to inform the ERP campaign. The monitoring data was considered with other research commissioned by Treasury:

- Project Safe & Sound, COVID-19 research undertaken by Resolve Strategic. The research examined the attitudes and behavioural responses of Australians to the health, economic and social effects of the COVID-19 pandemic<sup>182</sup>; and
- 2019 Budget Communications Research undertaken by Treasury. The research was designed to better understand the Australian public's awareness and attitude towards communication on the Federal Budget and to identify ways to enhance Treasury's communication and engagement approach.<sup>183</sup>

5.6 For Phase 1 of the ERP campaign, Treasury commissioned Kantar to test six communication concepts from three different creative agencies to communicate the Australian Government's approach to economic recovery.<sup>184</sup> Twelve online focus groups provided responses in September

181 As discussed in paragraph 2.33, that campaign was exempted from compliance with the Guidelines due to its urgent nature. The campaign ran from 3 April 2020 to 30 June 2020 and had two phases: Phase 1, Economic Response; and Phase 2, COVID-Safe Economy. The first phase was intended to inform Australians and businesses on how the economic response package worked and the supports available. Phase 2 encouraged the business community to develop COVID-Safe operational plans to keep employees and customers safe and was intended to continue to inform Australians and the business community on how the economic response package worked and how it supported individuals and their families.

182 The study included national online surveys of the general population and small and medium-sized enterprises (SMEs) over three months. Information was obtained from five tracking surveys, from May to August 2020.

183 The study 'included an online survey of 2,035 Australians and 10, 1.5-hour discussion groups held around the country, as well as a component focussed on media professionals and stakeholders including businesses, peak bodies, and other government stakeholders.'

184 Kantar, also known as Kantar Public, is a social research and consultancy agency. The term Kantar is used in this report to indicate Kantar and/or Kantar Public.



2020. The communication concept proposed by TBWA (Melbourne), *Our Comeback*, was recommended for development.

5.7 For Phase 2 of the ERP campaign, Treasury engaged Kantar to conduct research to assess communication materials to support that phase, as well as undertaking a desktop analysis on community perceptions on economic recovery, and individuals' own financial situations.<sup>185</sup> Treasury used analysis from these sources to develop the request for quote to TBWA (Melbourne). Kantar tested TBWA's four communication concepts<sup>186</sup>; with *Our Economy's On Track to Comeback* recommended for development.

5.8 The government considered Phase 1 of the ERP campaign four times in 2020<sup>187</sup>, and considered Phase 2 twice in 2021.<sup>188</sup>

### *Campaign funding*

5.9 The government approved \$15 million for Phase 1 of the ERP campaign in September 2020 and \$15 million in May 2021 for Phase 2.

## **Were the necessary review, certification and publication requirements undertaken?**

The ERP campaign was subject to the necessary review, certification and publication requirements. Treasury did not document consideration of whether campaign research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. The Independent Communications Committee reviewed the two phases of the campaign. Documented verification of campaign statements was completed for both phases but only included in the Secretary's briefing pack for Phase 2. The certification by the Secretary was not provided to the Minister for either phase as required by the Guidelines, however documentation provided to the Minister for each phase advised that the Secretary had signed the certification statement.

### **Review by the Independent Communications Committee**

5.10 The Independent Communications Committee (ICC) first reviewed ERP campaign material on 30 September 2020.<sup>189</sup> On 6 October 2020, the ICC chair advised the Secretary of the Treasury

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185 Sources of analysis included JWS Research True Issues, November 2020; Pollinate Pulse, September 2020; Edelman Trust Barometer 2021; and Kantar short survey, February 2021.

186 Six online focus groups provided responses in May 2021 to assess the viability of the four proposed concepts for the second phase of communication.

187 The government approved campaign development in September 2020; approved the selection of TBWA (Melbourne) as the creative supplier in October 2020; agreed to commence production in October 2020 and agreed commencing some media placement late October 2020.

188 The government agreed, amongst other things, the: communications strategy, creative concept, draft media strategy and plan in May 2021; advertising materials proceeding to placement in the media, and to Ministers (including the Treasurer) finalising a revised media plan out of session in June 2021.

189 The ICC met with departmental officials and reviewed: the communication strategy; formative communications research; draft media strategy and indicative media plan overview; and a Statement against Principles 1 to 4 of 2014 Guidelines. A Statement against the Principles is a document prepared by entities to provide their accountable authority with advice as to a campaign's compliance with Principles 1 to 4 of the Guidelines.



that the ICC had concluded that the proposed campaign ‘was capable of complying with Principles 1 to 4 of the Guidelines’. The ICC noted in that correspondence that:

The Committee’s view was ... predicated on assurances the Department would manage carefully the development of the campaign ensuring the communications package contained details of the recovery initiatives and how they might be accessed by the public. The Committee was also reassured by the Department [that] the language in the campaign’s creative materials would be managed to remain clearly distinguishable from party political material.

5.11 The ICC reviewed Phase 2 campaign materials on 26 May 2021 and 3 June 2021 and concluded that the campaign ‘was capable of complying with Principles 1 to 4 of the guidelines’ on 3 June 2021.<sup>190</sup>

### **Secretary’s certification**

5.12 Paragraph 14 of the 2014 Guidelines and paragraph 19 of the 2020 Guidelines require the entity’s accountable authority to consider reports from the ICC and the entity on campaign compliance, before providing certification to the relevant Minister, who may launch the campaign or approve its launch. This sequence of activity aims to ensure that the ICC’s review informs the accountable authority, and that the certification from the accountable authority informs the responsible Minister’s decision.

5.13 For Phase 1, Treasury provided the Secretary with a briefing pack that included a background summary, a Statement Against the Principles of the Guidelines, the Chief Executive Certification for Government Advertising Campaigns and details of the first round of creative materials. The briefing pack provided to the Secretary included the statement that: ‘Materials have been reviewed and approved for factual accuracy with the relevant Treasury policy divisions’ but did not include the verification document.<sup>191</sup> Including the verification document in the pack (as was done for Phase 2) would have assisted Treasury in providing assurance to the Secretary that the campaign complied with the Guidelines. Treasury obtained internal advice that the campaign was compliant with Principle 5 of the 2014 Guidelines. The Secretary certified this material as compliant with the Guidelines on 12 October 2020.

5.14 Treasury sought approval from the Treasurer to launch the campaign on 13 October 2020. The brief provided to the Treasurer contained a summary of relevant material. The Treasurer gave authority to launch the campaign on 13 October 2020, one day before the campaign launch on 14 October 2020. The Secretary’s certification of campaign compliance was not provided to the

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190 The ICC reviewed: the communication strategy; tracking evaluation research of Phase 1; draft media strategy and indicative media plan overview; and Statement against Principles 1 to 4 of the Guidelines.

191 Paragraph 21 of the 2014 Guidelines stated that: ‘Where information is presented as a fact, it should be accurate and verifiable.’ The pack did not include the advice and certification that indicated the campaign was compliant with Principle 5 of the Guidelines.

Minister, although documentation provided to the Minister included advice that the Secretary had certified that the campaign complied with the Guidelines.<sup>192</sup>

5.15 On 29 October 2020 Treasury advised the Secretary that the video component of the campaign materials was compliant with legal requirements. The scripts for the video component had previously been certified as compliant with the Principles by the Secretary on 12 October 2020. On 30 October 2020 the Secretary certified that the video component complied with the Principles. Treasury advised the ANAO in October 2021 that due to the nature and size of the video component these were physically shown to the Secretary.<sup>193</sup> On 30 October 2020, the Treasurer approved the launch of the video component. Similar to the process outlined in paragraph 5.14, the Secretary's certification of campaign compliance was not provided to the Minister, although documentation provided to the Minister included advice that the Secretary had certified that the campaign complied with the Guidelines.

5.16 For Phase 2, the Secretary was again provided with a briefing pack. This included the signed Statement Against the Principles showing updates from Phase 1, the accountable authority certification template, advice that the campaign complied with legal requirements, a background summary and documented verification of campaign statements. Certification of compliance for Phase 2 was provided by the Secretary on 3 June 2021. The Treasurer authorised the launch of Phase 2 on 4 June 2021, two days prior to the campaign launch. Similar to Phase 1, the certification by the Secretary was not provided to the Minister although documentation provided to the Minister included advice that the Secretary had signed the certification statement.

## Publication processes

5.17 The Secretary's certification statements for both phases of the campaign were published on Treasury's website and advice from the ICC was published on Finance's website as required. Treasury published the details of the advertising campaign in its 2020–21 Annual Report.<sup>194</sup>

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192 Paragraph 14 of the 2014 Guidelines stated that: 'The Chief Executive will give the certification to the relevant Minister who may launch the campaign or approve its launch.' For both phases, documentation provided to the ANAO shows advice being provided to the Treasurer that the Secretary had signed the certification statement, but does not show that the Treasurer was provided with a copy. Treasury advised the ANAO in January 2022 that: 'The certification statement was referenced in the briefing launch minute to the Minister and published on the Treasury website. It was not physically attached to the minute. Treasury has amended its procedures to ensure that in future, the relevant document is available as an attachment in the launch minute to the Minister.'

193 Treasury advised the ANAO in October 2021 that the documented verification of campaign statements 'was provided in person to the Accountable Authority with the campaign materials, due to the extremely tight timeframes'. Treasury also advised that government approval, legal certification and Secretary certification all occurred on the same day to meet the timeframes.

194 Paragraph 17AH(1)(a) of the PGPA Rule requires that annual reports include a statement providing details of any advertising campaigns undertaken by the entity in the reporting period. It also specifies a statement to be included in the annual report. The wording Treasury used varied slightly from the words included in the Rule. The change did not have a material effect.

5.18 Paragraph 17 of the 2014 Guidelines and paragraph 22 of the 2020 Guidelines state that Chief Executives/Accountable Authorities:

... will ensure that:

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

5.19 Similar to Infrastructure and DSS (as discussed in paragraphs 3.19 and 4.18), Treasury did not publish campaign related research on its website. All entities advised the ANAO that research reports conducted as part of government advertising campaigns are provided to the relevant Cabinet sub-committee to inform Cabinet decision-making. Research reports are therefore considered Cabinet-in-Confidence and can only be released publicly with the written agreement of the government.

5.20 Treasury (also similar to Infrastructure and DSS at paragraphs 3.20 and 4.19 respectively) had not documented any consideration of whether the research was appropriate for release and had not sought Ministerial permission for the publication of campaign related research. Given the requirement in the Guidelines, the accountable authority should be making active decisions about whether to seek Ministerial permission for the publication of campaign related research for each campaign. The basis of the decision should be documented. The publication of research enhances transparency.<sup>195</sup>

## Were the principles of the framework adhered to?

Treasury adhered to Principles 1 to 4 of the Guidelines and complied with Principle 5, with the exception of two contract notices (from a total of eight) that were not reported on AusTender within 42 days as required.

The campaign was: relevant to government responsibilities; presented in an objective; fair and accessible manner; not directed at promoting party political interests; and was justified and undertaken in an efficient, effective and relevant manner. Treasury obtained advice on compliance with legal requirements.

### Principle 1 — was the campaign relevant to Government responsibilities?

5.21 Treasury's Statement Against the Principles for each campaign phase established that the campaign related to government responsibilities. Both phases of the campaign aimed to communicate the government's plan for economic recovery, focusing on explaining how economic measures impact individuals and their families, and building consumer and business confidence by

195 Treasury advised the ANAO in January 2022 that 'Treasury notes that all campaign research reports are produced to inform a deliberative process of Cabinet and are therefore unable to be published on the Treasury website. Due to the ongoing nature of the Economic Recovery Plan campaign, it is still subject to Cabinet deliberation. It is therefore not appropriate to make the research reports public at this time and as a consequence Treasury does not consider it was necessary or appropriate to seek official confirmation from the Minister's Office regarding release of the research reports.'

providing information on available government support. This was consistent with the examples of suitable uses for government campaigns listed in the Guidelines.<sup>196</sup>

## **Principle 2 — was the campaign presented in an objective, fair and accessible manner, and designed to meet the objectives of the campaign?**

### *Objectivity of campaign statements*

5.22 The Guidelines state that where information is presented as a fact, it should be accurate and verifiable.<sup>197</sup> As outlined in paragraphs 5.13 and 5.16, Treasury developed verification packs of campaign statements for each campaign phase. The ANAO considered that the statements for both campaign phases were compliant with Principle 2. Campaign information for each phase directly affected the interests of the intended recipients (Australians over 18 years of age and businesses).

### *Accessibility of campaign materials*

5.23 Prior to the development of each phase, campaign concepts were tested with the target audience. Six concepts, from three different creative agencies, were tested for phase 1, with 'Our Come Back' recommended for progression by Kantar.<sup>198</sup> As well as being assessed as the most suitable of the six concepts presented, the target audience found the tagline 'Our Come Back' memorable. Kantar further suggested that the tagline could be used to link any further initiatives of the Economic Recovery Plan, regardless of the government entity the initiative originated from. Kantar conducted further testing of the 'Our Come Back' concept, recommending adjustments to images, colour and tone to address feedback from target focus groups.

5.24 For Phase 2, four campaign concepts from one creative agency<sup>199</sup> were assessed by the target audience, with the 'We're on Track to Come Back' concept recommended for progression due to it being assessed as realistic while also optimistic. Further testing of this concept resulted in adjustments to campaign scripts, images and display prominence of the web address.<sup>200</sup>

5.25 Images used in the advertising materials for each campaign phase portray Australians in a variety of industries and roles. For example, business owners, employees and jobseekers including

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196 The 2014 and 2020 Guidelines state that:

Examples of suitable uses for government campaigns include to:

- inform the public of new, existing or proposed government policies, or policy revisions;
- provide information on government programs or services or revisions to programs or services to which the public are entitled;
- inform consideration of issues;
- disseminate scientific, medical or health and safety information; or
- provide information on the performance of government to facilitate accountability to the public.

197 See paragraph 21 of the 2014 Guidelines and paragraph 27 of the 2020 Guidelines.

198 This concept was further refined through assessment with focus groups and was reported to be engaging and appropriate.

199 Under the transition arrangements to the 'village' model (discussed in chapter 2), and due to time pressure to progress the campaign launch, the Treasurer sought and obtained approval from the Assistant Minister for Electoral Matters for Treasury to engage TBWA for the Economic Recovery Plan Phase 2.

200 For example, to increase representation of small business and the industries in which they operate.

from culturally and linguistically diverse (CALD) communities.<sup>201</sup> Figure 5.1, below, shows examples of campaign images.

**Figure 5.1: Examples of Economic Recovery Plan campaign images**



Source: Treasury documentation.

5.26 Advertising materials were translated into 14 languages to meet the needs of culturally and linguistically diverse (CALD) audiences<sup>202</sup>, and Indigenous specific advertising media were used to disseminate information. Treasury sought to reach remote, rural and regional audiences through regional media channels and address the needs of sight-impaired consumers through print-handicapped radio and web content.

5.27 For ease of navigation and to enable targeted searching under the umbrella of the ERP, each campaign phase directed users to one website, [ourcomeback.gov.au](http://ourcomeback.gov.au), which was managed by Treasury. The website, badged under the Australian Government banner, provides information on economic measures under two categories: Individuals and Households; and Businesses and

201 Paragraph 24 of the 2014 Guidelines stated that: 'Imagery used in campaigns should reflect the diverse range of Australians. There should be recognition of the full participation of women, Indigenous and culturally and linguistically diverse communities by realistically portraying their interests, lifestyles and contributions to Australian society.'

Paragraph 31 of the 2020 Guidelines states that: 'Imagery used in campaigns appropriately reflects the diverse range of Australians. Where it is consistent with the campaign objectives, this includes the realistic portrayal of the full participation of women, Indigenous and culturally and linguistically diverse communities.'

202 The languages were Arabic, Cantonese, Greek, Italian, Khmer, Korean, Macedonian, Mandarin, Persian, Punjabi, Spanish, Thai, Turkish and Vietnamese.

Employers. From the site, links guide individuals directly to policy specific information on other government entity websites.<sup>203</sup>

### **Principle 3 — was the campaign objective and not directed at promoting party political interests?**

5.28 As required by paragraph 28 of the 2014 Guidelines and paragraph 36 of the 2020 Guidelines, the campaign materials for Phases 1 and 2 did not:

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

5.29 Treasury's Statement Against the Principles document for Phase 1 of the campaign stated that:

... it is envisaged that references will need to be made to the 'economic recovery plan', and this may be language that the Government does use in its own communications. It is viewed that this is not a 'political slogan' but instead reference to a range of measures that the Government is or intends, to implement.

Economic response advertising undertaken to communicate financial support available to Australians, has already made reference to "...*part of the Government's plan*..." so this would be a continuation of this style of messaging.

Economic response advertising has also included references to "*it is part of the Government's plan to keep businesses in business and Australians in jobs*". This has been used across most advertising about financial support and may continue in some materials if appropriate. Again, variations of this statement may be used in some communications by the Government but it is not considered a party political slogan.

5.30 Similarly, Treasury's Statement Against the Principles for Phase 2 stated that:

The second phase of the campaign will build on messages from the first phase, noting care needs to be taken to ensure messages are not seen to be party political in nature. Accordingly, Treasury will work with our ministerial offices to try and ensure separation between the language used in the campaign and that used in party political materials ... References will need to continue to be made to the 'come back' of the economy, and the 'economic recovery plan', to ensure alignment and consistency with the first phase of the campaign.

5.31 Treasury advised the ANAO in October 2021 that:

The 'Our Comeback' creative approach was selected following a competitive pitch process and market research testing of the creative concepts in the developmental phase of the first phase of

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203 For example, from [ourcomeback.gov.au](http://ourcomeback.gov.au), a click on 'Businesses & Employers' lists options under: payments and incentives; a digital Australia; doing business; infrastructure; construction and Australian industries. By clicking on one of the categories, for example, 'payments and incentives', users are provided with a summary list of benefits/programs, and subsequent links access specific details on the relevant entity website. For example, to the Australian Taxation Office for tax refunds for losses against prior year profits for business owners.

the campaign. The 'Our Comeback' tagline was pitched independently by two separate creative agencies during this process. Key messages and scripting were developed by the procured creative agency. During the pandemic, the words 'our comeback' became part of everyday language around the concept of recovery. The expression was used by the government, media and interest groups across Australia on various occasions without being a reference to the advertising campaign. In the lead up to the launch of the campaign, Treasury officers had discussions with ministerial staff on multiple occasions where it was reinforced that there needed to be a distinction maintained between the language used in the campaign and that being used in party political material. In future Treasury will ensure that appropriate records of these discussions are maintained.

5.32 Treasury documented verification of campaign statements for each phase and obtained advice that the campaign scripts did not reference any political party or express political views.<sup>204</sup> Treasury also prepared a risk register and mitigation strategy to manage potential campaign risks, however the risk of ensuring that messages are not seen to be party political in nature was not included in the risk register.<sup>205</sup>

#### **Principle 4 — was the campaign justified and undertaken in an efficient, effective and relevant manner?**

5.33 Principle 4 of the 2014 Guidelines stated that campaigns should only be instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence. In the 2020 Guidelines it is a requirement (ie. 'should' has been removed).

##### *The need for the campaign*

5.34 The ERP campaign was intended to inform audiences about existing and future components of the government's economic plan to sustain Australian households and businesses, and the Australian economy during the COVID-19 pandemic. The target audience is described slightly differently in Treasury documents. In its Statement Against the Principles document, Treasury stated that the target audience across rural, regional and metropolitan areas will include:

##### **Primary**

- All Australians (across all socio-economic backgrounds)
- Australian businesses

##### **Special Audiences**

We will ensure all campaign creative is accessible for the following groups

- Non-English speaking background ...
- Indigenous Australians
- People with disability.

204 As noted in paragraph 5.13, Treasury documented the verification of campaign statements for Phase 1 but did not provide them to the Secretary.

205 As discussed in paragraph 5.31, Treasury advised the ANAO in October 2021 that Treasury officers discussed with ministerial staff the need to maintain a distinction between campaign language and that being used in party political material.

5.35 The campaign strategy for Phase 1 was informed by a number of components, including Treasury research into: the behavioural response to the economic and social effects of COVID-19<sup>206</sup>; and the 2019 Budget Communications Research discussed in paragraph 5.5.<sup>207</sup> Treasury summarised its approach to Phase 1, in the Statement Against the Principles document, as follows:

During the COVID-19 pandemic, the primary concern for the Australian public has been securing the health and wellbeing of themselves, family and friends – and then the wider community.

While concerns around health have been and still are top of mind, the Australian community is also now seeking direction from the Government on how Australia will recover economically and to ensure Australian individuals and families have employment, and financial security ...

Given community expectations, now is the time to communicate to Australians that the Government has a plan and that there are steps being taken for economic recovery to stimulate employment opportunities and financial security ...

Similarly, as some of the temporary financial supports introduced by the Government are retargeted and payment amounts reduced (e.g. JobKeeper and Coronavirus Supplement) it is important for the Government to reassure those affected that there are other measures in place to drive employment, provide assistance to develop skills and help businesses rebuild ...

This timing coincides with the changes to financial supports and because the present economic imperative is to reduce the number of people on income support and increase the number of Australians in paid work.

The timing will also coincide with further announcements expected out of the Federal Budget on 6 October [2020].

5.36 Phase 2 of the ERP campaign was intended to inform the Australian community of the continuation of the government's plan for economic recovery and in turn build consumer and business confidence. Treasury documents report that Phase 2 was shaped by: Phase 1 campaign evaluation research; Treasury desktop analysis; and previously commissioned research applied to Phase 1.<sup>208</sup> Treasury summarised its approach in Phase 2 as follows:

Australia is still in a pandemic and as a result the Australian way of life has changed considerably. The impact of COVID-19 has been all encompassing. For some members of the community the changes have been significant with loss of work, income and even livelihood ...

Australians are still cautious. This is driven by an understanding that recovery is not momentary and will affect generations to come.

For the economy to maintain its momentum, Australians and business need to feel confident that they can safely participate in the economy. They need to be reassured that there is government support available to those who need it and that businesses are continuing to receive support.

Research conducted by the Treasury found that Australians want the Government to communicate about the Economic Recovery Plan, they are eager to understand what is continuing to be delivered and what the impact will be for individuals and businesses ...

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206 Project Safe and Sound examined COVID-19 impacts, including views on JobKeeper & Coronavirus Support Changes. The research was conducted by Resolve Strategic.

207 2019 Budget Communications Research conducted by Treasury to better understand the Australian public's awareness and attitude towards communication on the Federal Budget and to identify ways to enhance Treasury's communication and engagement approach.

208 Project Safe and Sound is discussed in paragraphs 5.5 and 5.35.



Research also found there is confusion between what is part of the Plan and what is a Budget measure. There is negligible awareness on what the next phase of the plan will include.

### *Delivering the campaign in an efficient, effective and relevant manner*

5.37 Principle 4 of the Guidelines provides that the medium and volume of the advertising activities should be cost effective and justifiable within the budget allocated to the campaign. Recommendations from the Master Media Agency (MMA), Universal McCann (UM), informed the mix of channels used in the campaign in order to maximise the number of people exposed to the campaign. Treasury records indicate that Treasury sought advice and negotiated adjustments to media placement throughout Phase 1 of the campaign. There was also evidence that Treasury took into account media placements that would be sensitive to restrictions arising as a result of COVID-19 lockdowns at the commencement of Phase 2.<sup>209</sup>

5.38 Principle 4 also provides that campaigns are to be undertaken in a relevant manner.<sup>210</sup> Treasury records defined the target audience for both campaign phases and, as discussed in paragraphs 5.23 and 5.24, concept testing was undertaken with representative groups prior to the development of each campaign phase. Treasury developed a website [www.ourcomeback.gov.au](http://www.ourcomeback.gov.au) to enable ease of access to information from multiple Australian Government entities via the one, visually uniform and consistently badged website.

5.39 In its media strategy for Phase 1, the MMA proposed a media mix designed to accommodate the needs of the target audience.<sup>211</sup> It is not clear from the media mix proposed whether the media used was modified for subsets of the target group. For example, no specific targeting of the 18–24, 25+, and/or small, medium or large businesses was described.

5.40 At the completion of Phase 1, the Media Performance Report Summary by the MMA and the Full Evaluation Report by Hall & Partners identified an opportunity to better engage with the audience by better tailoring messages to groups within the target audience.

### **Principle 5 — did the campaign comply with legal requirements and procurement policies and procedures?**

5.41 Paragraph 14 of the 2014 Guidelines and paragraph 19 of the 2020 Guidelines require entities to provide a report to their accountable authority on campaign compliance with Principle 5. For both phases of the ERP campaign Treasury obtained internal advice and provided certification that the campaign complied with Principle 5 of the Guidelines.

5.42 Paragraph 35 of the 2014 Guidelines and paragraph 44 of the 2020 Guidelines require entities to follow procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers, and state that there must be a clear audit trail regarding decision making.

209 For example, by excluding Victoria and greater Sydney from aspects of advertising in Phase 1 and Phase 2 respectively when those areas were in lockdown.

210 This includes an expectation that: target recipients are clearly identified and the campaign is informed by appropriate research or evidence and that campaign information clearly and directly affects the interests of recipients.

211 Twelve media options were listed and all were identified as targeting: People 18 and over and Businesses; People aged 18–24, People 25 and over, and Businesses; or People 18 and over.

5.43 For Phase 1 of the campaign Treasury conducted a limited tender for suppliers from the mandated Campaign Advertising Supplier Register (CASR), selecting Kantar for market research services and TBWA (Melbourne) for creative services.<sup>212</sup> The development stage for Phase 2 of the campaign occurred during the transition period from the CASR to the mandated use of the Government Communications Campaign Panel (GCCP), discussed in Chapter 1 (Box 2) of this report. The Department of Finance (Finance) had anticipated that all campaigns initiated from March 2021 would use the new procurement arrangements.

5.44 On 19 April 2021, the Treasurer sought approval from the Assistant Minister for Electoral Matters for Treasury to continue using the research and creative suppliers used for Phase 1 rather than using the suppliers mandated under the GCCP. On 30 April 2021 the Assistant Minister approved the use of the Phase 1 campaign suppliers for Phase 2.

5.45 Treasury conducted sole source limited tender procurements to engage Kantar and TBWA. Although exempted from the use of the GCCP, Treasury complied with a request from Finance to engage the two suppliers using the newly developed GCCP documents, including a request for quote and contract arrangements.

5.46 For each procurement, the ANAO assessed Treasury's compliance against selected key requirements of the Commonwealth Procurement Rules (CPRs).<sup>213</sup> With the exception of two contract notices (from a total of eight) not being reported on AusTender within 42 days as required, Treasury was found to be compliant for both phases.<sup>214</sup>

## Was the campaign evaluated to determine its effectiveness?

Phase 1 of the ERP campaign was evaluated to determine its effectiveness, consistent with the whole-of-government campaign evaluation process conducted by Hall & Partners. The evaluation identified that the campaign reached around one third of the general public and two fifths of business audiences, but there were no increases in overall public or business awareness or understanding, or changes in attitudes and behaviours, which were the two campaign factors monitored and evaluated by Hall & Partners. Weekly monitoring of campaign impact and the evaluation of campaign outcomes were assessed using pre-campaign benchmarks of: awareness and understanding; and attitudes and behaviours measured against the campaign objectives. At the end of audit fieldwork (October 2021), Phase 2 of the campaign was paused due to COVID-19 lockdown restrictions and therefore Phase 2 has not been evaluated to determine its effectiveness.

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212 Treasury approached three suppliers for the procurement of research services and three suppliers for the procurement of creative services.

213 The ANAO assessed: how the suppliers were engaged; the criteria they were assessed on; whether value for money of the supplier proposals was examined and provided to a delegate; if the procurement was approved by someone with appropriate delegation; whether the level of documentation was commensurate with the scale, scope and risk of the procurement; if a contract was formed with the selected supplier; and if the details of that contract were accurately reported on AusTender within 42 days.

214 Treasury advised the ANAO in January 2022 that: 'Treasury acknowledges that in this instance an administrative error occurred during the Economic Recovery Plan campaign, resulting in two contracts being published on AusTender outside of the 42 days. Internal processes related to campaign contract management have been amended to address this issue.'

5.47 The 2014 and 2020 Guidelines state that campaigns should be evaluated to determine their effectiveness. As outlined in Table 5.1, the overall aim of Phase 1 of the campaign was to ‘set and communicate a clear narrative of the Government’s plan for economic recovery, focusing on explaining how the economic measures would impact individuals and their families, particularly how they support getting people back to work’.

5.48 Prior to the campaign launch, Hall & Partners developed performance benchmarks for: awareness and understanding; and attitudes and behaviours which aligned with the communication objectives of the campaign. Questions asked of research respondents each week were structured to assess changes from the pre-campaign benchmarks. For example, whether individuals were aware of a statement prior to completing the campaign survey. Statements included:

- the Australian Government is supporting businesses to hire more employees through the temporary JobMaker Hiring Credit;
- the Australian Government is creating thousands of jobs in the infrastructure sector;
- I am very concerned about the impact of COVID-10 on the Australian economy; and
- I am concerned about how long it will take for the Australian economy to recover.

5.49 Hall & Partners reported tracking data from community and business respondents<sup>215</sup> each week for Phase 1<sup>216</sup>, and for one week of Phase 2 before the campaign was paused. The *Key Findings for the Tracking and Evaluation Survey* reports prepared for each campaign phase tracked changes against the pre-campaign benchmark for the general community and business groups under the following two categories:

- Awareness and understanding — of the Economic Recovery Plan (six measures); and
- Attitudes and perceptions — in relation to the Economic Recovery Plan (six measures), and the Australian economy (four measures).<sup>217</sup>

5.50 In September 2021, Treasury advised the ANAO that as part of campaign development all campaign research is provided to the relevant Minister’s office, policy areas and the Service Delivery and Coordination Committee of Cabinet (SDCC) through the government approval process.

5.51 The Economic Recovery Plan Campaign Full Evaluation Report (February 2021) prepared by Hall & Partners consolidated Phase 1 campaign tracking outcomes under the three key messages of campaign reach<sup>218</sup>, response<sup>219</sup> and impact.<sup>220</sup> The report stated that:

215 Hall & Partners conducted benchmarking and weekly tracking of online surveys of the general population and small businesses over nine weeks of Phase 1 of the campaign (from 21 October to 20 December 2020) and for week one of Phase 2 (7–13 June 2021) prior to the campaign being paused due to COVID-19 lockdown restrictions. The campaign was not in market in Victoria during Phase 2.

216 Throughout the campaign the Treasury, in negotiation with the MMA and Hall & Partners, made adjustments to media type and spend or included additional monitoring queries in response to campaign monitoring.

217 Survey responses were linked to either of the two categories to assess, for example, whether respondents: had seen, heard or read about the ERP and via which medium; were aware of economic programs available such as tax concessions for business; were concerned about the economy; and whether the campaign had led them to take related actions such as searching online for more information, or accessing or applying for Australian Government support.

218 Reach: How many saw it; Who saw it; and Where did they see it.

219 Response: How did they react to it; Did they take out the intended messages; and Did they understand it.

220 Impact: Did they change their understanding, attitudes or behaviour; and Did it encourage them to find out more.

1. The campaign reached around one third of the general public and two fifths of business audiences ... Campaign recognition was primarily driven by video content ... Campaign recognition was highest among families, younger singles and couples as well as medium and larger sized businesses.
2. Diagnostically, the campaign performed well. Comparable to the COVID19 Economic Response campaign, key message cut-through was relatively strong among both audiences. Engagement with the video and creative content was solid, and campaign perceptions positive — particularly among business audiences who were more likely [to] perceive it as increasing confidence and encouraging action.
3. While no improvements were seen in overall awareness, attitudes and behaviours (with some, such as awareness and understanding and confidence, even declining), there is evidence that the campaign potentially played a maintenance role. With awareness, attitudes and behaviours declining among those who had not seen / heard the campaign, and those exposed being better informed, having more positive attitudes and perceptions and being more likely to engage in key behaviours, it is possible that (further) declines would have occurred had the campaign not been in market.<sup>221</sup>

5.52 The report identified five ‘learnings to take forward’, which are listed in Table 5.2 below.

**Table 5.2: Hall & Partners — learnings identified in the Phase 1 evaluation report**

Learning	Implications / recommendation
What has worked well	
The media mix was successful in targeting key audiences, with video content driving reach, and radio in particular providing additional reach.	Consider using a similar media mix strategy (including similar weighting of spend across channels) in future campaigns targeting these audiences.
Diagnostically, the campaign performed well, with the creative seen as informative and increasing confidence, as well as engaging audiences across individual video and radio executions.	In future campaigns, consider utilising a similar approach with positive, clear and direct messaging. There is however, an opportunity to strengthen the call to action as this was a comparatively weaker element of the creative.
The campaign resonated well and had stronger cut through among business audiences who were better informed and more likely to take key actions.	Initiatives to rebuild the economy tend to be of greater relevance to businesses, and hence communications targeting this audience are likely to have stronger cut through and be more cost effective than a broader based approach.

<sup>221</sup> The report noted that key metrics around awareness, understanding, attitudes and behaviours were captured prior to the launch of the campaign and were used as a benchmark comparison. The benchmark data was collected the week following the announcement of the 2020–21 Federal Budget and this may have contributed to heightened levels of awareness and understanding of the initiatives within the Plan among target audiences. The report also stated that there were a number of ‘Australian Government campaigns in market concurrently informing the public on important health aspects related to the COVID 19 crisis. This is important contextual information that should be taken into account when considering the findings from this evaluation.’

What has not worked well	
The media buy timing, coinciding with a competitive and cluttered media environment in the lead up to the Christmas period — resulting in limited reach and, ultimately, limiting the campaign impact.	Consider the broader media environment well ahead of the launch of any campaign activity to ensure that the media buy is optimised and return-on-investment maximised, particularly in a more competitive media setting. Alternatively, consideration may be given to running the campaign at a different, less cluttered time.
Lower campaign cut-through and impact among small business owners and decision makers, who were less informed, held less positive attitudes, and were less likely to have taken action compared to other business audiences.	There is an opportunity to better engage with this audience by tailoring messaging and creative approach to resonate more with smaller businesses and the industries in which they typically dominate.

Source: Hall & Partners Economic Recovery Plan Campaign Full Evaluation Report (February 2021).

5.53 The MMA also undertook campaign monitoring, and reported in its Media Performance Report Summary (October 2020 to December 2020) that:

- The campaign delivered strongly against most channel KPIs<sup>222</sup> with the exception of some digital strategies, which fell short of the benchmark ...
- TV delivered strong reach results despite [quarter] 4 challenges ...
- Overall, digital ... delivered 23.3 million completed views with over 950k [950,000] clicks to site. The digital component of the buy reached 16.5 million unique individuals.

5.54 The report provided six recommendations for future campaigns. These were that Treasury:

- consider lead times for future quarter four campaigns or moving activity out of this peak period;
- continue to buy digital audio combined with commercial radio to capitalise on audience behaviour<sup>223</sup>;
- continue using the Movie Audience Preferred<sup>224</sup> buying model as film release dates remain volatile;
- consider other formats for future campaigns (retail improved in the lead up to the Christmas period but more people were returning outdoors);
- developing fit for purpose and tailored ads within digital environments for each audience to achieve greater engagement; and
- building out website content to run dynamic search ad<sup>225</sup> campaigns.

5.55 There is evidence that the evaluations of Phase 1 by Hall & Partners and the MMA were considered in the development of Phase 2. When developing Phase 2, Treasury provided all

222 The MMA uses industry key performance indicators.

223 As a result of COVID-19, data indicated a trend towards people consuming digital radio, mobile and DAB+ platforms. DAB+ refers to a widely adopted digital audio broadcasting standard.

224 The Movie Audience Preferred buying model is a targeted buy that is considered to be effective at meeting cost per thousand impressions targets as it provides flexibility in programming and the opportunity to geo-target.

225 Dynamic search ad campaigns feature a type of Google search advertising that does not involve keywords. Instead, these campaigns allow Google to feature advertisements based on pages of a website that could match a query ad showing a link to the page.

suppliers, including MMA, with the final evaluation report prepared by Hall & Partners; sought advice from MMA to target the 18–25 and 25+ audience; and business. The targeted business communication which was planned to be incorporated in Phase 2, in response to feedback from Phase 1, was not progressed because the campaign was paused.

5.56 As discussed in chapter 2 (paragraph 2.84), chapter 3 (paragraph 3.87) and chapter 4 (paragraph 4.47), the audited entities did not specify performance targets and there is an opportunity for entities to engage with Finance and Hall & Partners to support improvements in the evaluation of campaigns to drive better outcomes.

5.57 Treasury advised the ANAO that it sets high level campaign objectives at the beginning of the campaign development process as part of the communications strategy. Treasury further advised that at this point in time there is no benchmarking data available to guide entities in setting campaign targets for levels of awareness, understanding, or attitudes and perceptions, making it difficult to set targets.

5.58 Since the implementation of the whole-of-government campaign evaluation process in 2018, Finance has compiled a database of all government advertising campaign evaluations. It is envisaged that with increasing numbers of campaigns included, interrogation of the database will enable entities to develop practical performance targets for the reach, response and impact of their advertising campaigns from their pre-campaign benchmark. This will enable entities to increase the efficacy of their campaign evaluation processes.

### Recommendation no. 7

5.59 The Department of the Treasury establish performance targets and report against them as part of campaign evaluation.

**Department of the Treasury:** *Agreed.*

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Grant Hehir  
Auditor-General

Canberra ACT  
17 February 2022

## **Appendices**

## Appendix 1 Entity responses



### Australian Government Department of Finance

Rosemary Huxtable PSM  
Secretary

Our Ref: EC22-000007

Mr Grant Hehir  
Auditor-General  
Australian National Audit Office  
GPO Box 707  
CANBERRA ACT 2601

Dear Mr Hehir

I refer to the Australian National Audit Office's (ANAO's) correspondence of 8 December 2021 providing the proposed Audit Report, *Government Advertising: May 2019 to October 2021* (the Report), pursuant to section 19 of the *Auditor-General Act 1997*.

I note and welcome the conclusion of the ANAO that the Department of Finance has been effective in the whole-of-government administration of the Government's campaign advertising framework, including in supporting entities, providing secretariat support to the Independent Communications Committee, preparing the annual campaign expenditure report, and advising on emerging risks, issues and framework changes, including options for responding to previous ANAO performance audit recommendations.

Regarding Recommendation 1, which is directed to the department, Finance agrees the recommendation and will continue to work with Commonwealth entities to support their understanding of the Guidelines.

I have separately provided some editorial comments that have been discussed with your officers.

Thank you for the opportunity to respond to the report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Huxtable', with a long horizontal flourish extending to the right.

Rosemary Huxtable  
Secretary

14 January 2022

One Canberra Avenue, Forrest ACT 2603 • Telephone 02 6215 3445  
Internet [www.finance.gov.au](http://www.finance.gov.au)





**Australian Government**  
**Department of Infrastructure, Transport,**  
**Regional Development and Communications**

**Secretary**  
**Simon Atkinson**

Mr Grant Hehir  
 Auditor-General  
 Australian National Audit Office  
 GPO Box 707  
 CANBERRA ACT 2601

Dear <sup>Grant</sup>Mr Hehir

**Auditor-General Proposed Audit Report on *Australian Government Advertising: May 2019 to October 2021***

Thank you for providing the Department of Infrastructure, Transport, Regional Development and Communications (the Department) with the opportunity to comment on the Australian National Audit Office's (ANAO's) proposed audit report on *Australian Government Advertising: May 2019 to October 2021*.

The Department acknowledges the ANAO's overall conclusions and welcomes the recommendations. The Department's summary response and response to each of the recommendations is attached.

The Department notes that the ANAO's findings indicate improvements in campaign administration particularly in relation to Wave 3 of the *Building Our Future* campaign. The Department is committed to continuous improvement and will use the ANAO's findings to further refine and improve our campaign processes and guidance.

Please contact Maree Bridger, A/g Chief Operating Officer on (02) 6274 7029 if you would like to discuss this response.

I would like to thank the ANAO for the cooperation of the audit team and the professional manner in which the audit was conducted.

Yours sincerely

Simon Atkinson

8 February 2022

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**Australian Government**  
**Department of Social Services**

**Liz Hefren-Webb**  
Acting Secretary

Ref: EC21-003453

Mr Grant Hehir  
Auditor-General  
Australian National Audit office  
GPO Box 70  
CANBERRA ACT 2601

Dear Mr Hehir,

**Department of Social Services response to Proposed Audit Report -*Australian Government Advertising: May 2019 to October 2021.***

Thank you for providing the Australian National Audit Office's (ANAO) proposed report on the audit of Australian Government Advertising: May 2019 to October 2021. I appreciate the opportunity to respond to the report and value the independent insights and identified opportunities for continual improvement.

The Department of Social Services (the department) acknowledges the ANAO's overall conclusion that it has been effective in its implementation of the Australian Government's advertising framework for the "Help is Here" campaign.

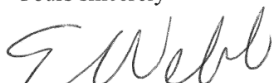
The department accepts Recommendation 6 and will work the relevant entities to ensure future campaign communication objectives are measurable and, where possible, set performance targets based on available data.

The department acknowledges the opportunity to continue to strengthen our campaign certification process and notes that while the briefings provided to the Secretary did not include line by line verification of each of the campaign statements, the department did meet all relevant requirements of the Guidelines.

A summary of the department's overall response, detailed response to Recommendation 6 and editorial matters the department wishes to bring to the ANAO's attention are provided at **Attachment A**.

If you would like further information on the department's response, please do not hesitate to contact Jennie Armstrong on (02) 6146 0288 or via [jennie.armstrong@dss.gov.au](mailto:jennie.armstrong@dss.gov.au).

Yours sincerely



Liz Hefren-Webb

12 January 2022

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**Australian Government**  
**The Treasury**

**Secretary**  
**Dr Steven Kennedy PSM**

Mr Grant Hehir  
Auditor-General, Australian National Audit Office  
GPO Box 707  
Canberra ACT 2601

Dear Mr Hehir 

**Proposed Audit Report on Australian Government Advertising: May 2019 to October 2021**

Thank you for the opportunity to respond to your draft report on Australian Government Advertising: May 2019 to October 2021. This letter relates to your review of Treasury's management of the Economic Recovery Plan advertising campaign (phase one and two) and its compliance with the *Guidelines of Information and Advertising campaigns by non-corporate Commonwealth entities (Guidelines)*. I am taking the opportunity to update Treasury's response dated 14 January 2022, following discussion between staff in our respective agencies.

Treasury recognises the importance of ensuring effective implementation of the Australian Government's campaign advertising framework and welcomes the finding that Treasury has been effective in its implementation of framework requirements for the selected campaign. Your report identifies one specific recommendation for the Treasury regarding our campaign evaluation processes, specifically, that the Treasury establish performance targets and report against them as part of campaign evaluation. The Department agrees with the recommendation.

Treasury established clear objectives for both phases of the campaign and evaluated both phases of the campaign against benchmark data gathered at the start of each phase of the campaign. Treasury will continue to work within the Whole-of-Government Evaluation Framework for advertising campaigns and set appropriate measurable performance targets to effectively track and evaluate campaigns. In implementing campaigns, departments come under scrutiny to justify and evaluate campaign effectiveness, and we note that there is a potential opportunity for the Department of Finance to work with departments to review the current evaluation framework. Treasury will actively participate in any review of the Whole-of-Government Evaluation Framework.

Your report also identified and provided detail on some specific issues in our campaign administrative processes. Further information on how Treasury will address the review, certification and publication requirements in the future are detailed in **Attachment A**. A summary of Treasury's response for the purposes of ANAO reporting is at **Attachment B**.

Langton Crescent, PARKES ACT 2600 • Telephone: 61 2 6263 3738 • Facsimile: 61 2 6263 3360  
Website: [www.treasury.gov.au](http://www.treasury.gov.au) • ABN 92 802 414 793

Should you require any additional information, please contact Ms Shannon Kenna,  
Assistant Secretary, Communications Branch on 02 6263 3328 or [shannon.kenna@treasury.gov.au](mailto:shannon.kenna@treasury.gov.au)

Yours sincerely



Steven Kennedy

15 January 2022

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INDEPENDENT COMMUNICATIONS COMMITTEE

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Mr Grant Hehir  
Auditor General  
Australian National Audit Office  
GPO Box 707  
CANBERRA ACT 2601

Dear Mr Hehir

**RE: Auditor-General Proposed Audit Report on Australian Government Advertising:  
May 2019 to October 2021**

Thank you for the opportunity to review an extract of the Auditor-General Proposed Audit Report on Australian Government Advertising: May 2019 to October 2021, provided to the Independent Communications Committee (ICC) under section 19 of the *Auditor-General Act 1997*.

The Committee has no concerns with the findings that have been drafted as part of the Report.

I would like to thank and acknowledge members of the Audit team, Michelle Page, Grace Guilfoyle and Elizabeth Wedgewood for their constructive and professional engagement with the Committee during the meeting of 7 October 2021.

Kind regards



Andrew Blyth  
Chair  
Independent Communications Committee  
5 January 2021

*c/o ICC Secretariat: Communications Advice Branch,  
Department of Finance  
One Canberra Avenue, Forrest ACT 2600*

## Appendix 2 Performance improvements observed by the ANAO

1. The existence of independent external audit, and the accompanying potential for scrutiny improves performance. Improvements in administrative and management practices usually occur: in anticipation of ANAO audit activity; during an audit engagement; as interim findings are made; and/or after the audit has been completed and formal findings are communicated.
2. The Joint Committee of Public Accounts and Audit (JCPAA) has encouraged the ANAO to consider ways in which the ANAO could capture and describe some of these impacts. The ANAO's 2021–22 Corporate Plan states that the ANAO's annual performance statements will provide a narrative that will consider, amongst other matters, analysis of key improvements made by entities during a performance audit process based on information included in tabled performance audit reports.
3. Performance audits involve close engagement between the ANAO and the audited entity as well as other stakeholders involved in the program or activity being audited. Throughout the audit engagement, the ANAO outlines to the entity the preliminary audit findings, conclusions and potential audit recommendations. This ensures that final recommendations are appropriately targeted and encourages entities to take early remedial action on any identified matters during the course of an audit. Remedial actions entities may take during the audit include:
  - strengthening governance arrangements;
  - introducing or revising policies, strategies, guidelines or administrative processes; and
  - initiating reviews or investigations.
4. Since the ANAO last reviewed the framework in 2019<sup>226</sup> Finance has provided options to the Australian Government on previous ANAO recommendations relating to the framework as a whole. The outcome of this process was discussed in the body of this audit report. While not all recommendations were implemented by the government, recommendations relating to mandating the five overarching principles and improving the transparency of expenditure reporting were agreed and implemented.
5. During the course of the audit, the ANAO observed that:
  - DSS advised the ANAO that it adjusted its draft 2020–21 Annual Report to ensure the wording required by the Public Governance, Performance and Accountability Rule 2014 in relation to advertising was reflected in its final annual report; and
  - Treasury advised the ANAO that: it had amended its procedures to ensure that the Secretary's campaign certification statement is available as an attachment in the launch minute to the Minister; and campaign contract management processes had been amended to ensure that contract details are published on AusTender within 42 days as required by the Commonwealth Procurement Rules.

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226 See Auditor-General Report No.7 2019–20 *Government Advertising: June 2015 to April 2019*, which included six recommendations.

## Appendix 3 Campaign Principles

1. The *Australian Government Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities* of October 2020 sets out the five overarching campaign principles. Paragraph 11 of the Guidelines provides that:

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

1. relevant to government responsibilities
2. presented in an objective, fair and accessible manner
3. objective and not directed at promoting party political interests
4. justified and undertaken in an efficient, effective and relevant manner, and
5. compliant with legal requirements and procurement policies and procedures.

### Campaign Principles

2. There are five overarching campaign principles which set out the context in which Commonwealth Government campaigns are to be conducted. They relate to when campaigns can be conducted, how they are presented, and the legal and procurement requirements.

#### *Principle 1: Relevant to government responsibilities*

23. In demonstrating compliance with this principle considerations include:

- The subject matter of the campaign directly relates to the Government's responsibilities
- The policy or program is underpinned by:
  - legislative authority; or
  - appropriation of the Parliament; or
  - a Cabinet Decision which is intended to be implemented during the current Parliament

24. Examples of suitable uses for government campaigns include to:

- inform the public of new, existing or proposed government policies, or policy revisions;
- provide information on government programs or services or revisions to programs or services to which the public are entitled;
- inform consideration of issues;
- disseminate scientific, medical or health and safety information; or
- provide information on the performance of government to facilitate accountability to the public.

#### *Principle 2: Presented in an objective, fair and accessible manner*

25. In demonstrating compliance with this Principle considerations include:

26. The recipients of the information can distinguish between facts, comment, opinion and analysis.
27. Information presented as a fact, is accurate and verifiable.
28. The basis of factual comparisons is clear and does not mislead the recipient about the situation,
29. Pre-existing policies, products, services and activities are not presented as new.
30. Special attention is paid to communicating with any information disadvantaged individuals or groups identified as being within the target audience. Particular attention is paid to meeting the information needs of Indigenous Australians, the rural community and those for whom English is not a convenient language in which to receive information.
31. Imagery used in campaigns appropriately reflects the diverse range of Australians. Where it is consistent with the campaign objectives, this includes the realistic portrayal of the full participation of women, Indigenous and culturally and linguistically diverse communities.
32. Campaigns are tested with target audiences to indicate they are engaging and perform well against their objectives.

***Principle 3: Objective and not directed at promoting party political interests***

33. In demonstrating compliance with this Principle considerations include:
34. Language used in the campaign is objective language and is free of political argument.
35. Campaigns must not try to foster a positive impression of a particular political party or promote party political interests.
36. Campaigns must not:
  - a. mention the party in Government by name;
  - b. directly attack or scorn the views, policies or actions of others such as the policies and opinions of opposition parties or groups;
  - c. include party political slogans or images;
  - d. be designed to influence public support for a political party, a candidate for election, a Minister or a Member of Parliament; or
  - e. refer or link to the web sites of politicians or political parties.

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

37. In demonstrating compliance with this Principle considerations include:
38. Campaigns are only instigated where a need is demonstrated, target recipients are clearly identified and the campaign is informed by appropriate research or evidence.
39. Campaign information clearly and directly affect the interests of recipients.
40. The medium and volume of the advertising activities is cost effective and justifiable within the budget allocated to the campaign.
41. Distribution of unsolicited material should be carefully controlled.
42. Campaigns are evaluated to determine effectiveness.



*Principle 5: Compliant with legal requirements and procurement policies and procedures*

43. The manner of presentation and the delivery of campaigns must comply with all relevant laws including:
  - a. laws with respect to broadcasting and media;
  - b. privacy laws;
  - c. intellectual property laws;
  - d. electoral laws;
  - e. trade practices and consumer protection laws; and
  - f. workplace relations laws.
44. Procurement policies and procedures for the tendering and commissioning of services and the employment of suppliers are to be followed, and there must be a clear audit trail regarding decision making.

## Appendix 4 Government Communications Campaign Panel Suppliers

**Table A.1: Government Communications Campaign Panel**

Media requirements	Security	Economy	Health & Wellbeing	Delivering Government Programs & Services	Building our Community	Infrastructure & Innovation
Advertising	BMF	Clemenger BBDO Melbourne	Ogilvy Australia	The Monkeys	TBWA Melbourne	
Developmental and Concept Testing Research	Kantar Public	Whereto Research	Fifty-five Five	Ipsos Public Affairs	ORIMA Research	
Public Relations	Cox Inall Change	Think HQ	Fenton	Horizon	Think HQ	
Communication with Multi-cultural Audiences	Cultural Perspectives	Cultureverse	Cultural Perspectives	Embrace Society	Cultureverse	
Communication with Aboriginal and Torres Strait Islander Audiences	Carbon Media	33 Creative	Carbon Media	Cox Inall Ridgeway	TBWA Melbourne	

Source: Finance documentation.

## Appendix 5 Components of the Infrastructure Investment Pipeline

**Table A.2: Components of the Infrastructure Investment Pipeline**

	2018–19 Federal Budget funding (\$b)	2019–20 Federal Budget funding (\$b)	2020–21 Federal Budget funding (\$b)	2021–22 Federal Budget funding (\$b)
Infrastructure Investment Program <sup>a</sup>	48.80	73.12	81.47	76.78
Financial Assistance Grants (local roads) <sup>b</sup>	7.96	8.26	7.89	8.23
Equity allocations <sup>c</sup>	14.97	13.48	12.48	18.66
Other infrastructure investments <sup>d</sup>	0.51	0.93	2.86	2.50
Funding for specific projects, recorded as contingent liabilities <sup>e</sup>	4.16	4.16	5.16	5.16
<b>Total</b>	<b>76.40</b>	<b>99.94</b>	<b>109.87</b>	<b>111.33</b>

Note a: The Infrastructure Investment Program is made up of grant funding made through a range of different programs, including the Urban Congestion Fund, Roads of Strategic Importance and National Rail Program.

Note b: Financial Assistance Grants are annual grants to local government made under the *Local Government (Financial Assistance) Act 1995*. Financial Assistance Grants have two components: a general-purpose component and a local road component. The Infrastructure Investment Pipeline only includes the local road component.

Note c: Equity allocations include equity funding and concessional loans to projects. Relevant projects include Melbourne to Brisbane Inland Rail, Western Sydney Airport, Moorebank Intermodal Terminal, Adelaide to Tarcoola Rail Upgrade and WestConnex.

Note d: Other infrastructure investments include City and Regional Deals, Drought Communities Program, Local Roads and Community Infrastructure payments.

Note e: Funding for East West Link and Perth Freight Link are recorded as contingent liabilities for each of the Budgets listed in the table.

Source: ANAO analysis of Infrastructure documentation.

## Appendix 6 Infrastructure evaluation recommendations and actions taken

**Table A.3: BOF Phase 2 Wave 1 evaluation recommendations and actions taken**

Recommendation	Wave 2 actions	Wave 3 actions
‘Improving the target audience’s understanding of the impact and benefits of infrastructure projects.’	Not implemented — Wave 2 used the same creative materials as Wave 1 with some updates to project information.	Implemented — Wave 3 used different creative materials that more clearly addressed the impact and benefits of infrastructure projects.
‘Continuing to use localised content to highlight personal relevance and benefit of projects to the target audience.’	Implemented — Wave 2 used the same creative materials as Wave 1, which used localised content.	Implemented — Wave 3 had a ‘hyper-localised’ approach.
‘Reconsidering the proportion and allocation of expenditure directed to print advertising.’	Implemented — print advertising expenditure was significantly lower than Wave 1.	Implemented — print advertising expenditure was significantly lower than Wave 1.
‘A campaign duration of 4–5 weeks of activity may be sufficient in future.’	Implemented — Wave 2 duration was approximately 4 weeks. <sup>a</sup>	Not implemented — while an early version of the communications strategy noted that ‘research ... showed that long advertising periods (three months) in the market were ineffective’, Wave 3 duration was approximately 11 weeks.
‘Considering longer times between phases to showcase project progress.’	Not implemented — Wave 2 occurred approximately 7 months after Wave 1.	Implemented — while Wave 3 was planned to begin in early 2020, it was delayed to April 2021.

Note a: The campaign dates were 3 November 2019 to 18 January 2020, and most advertising activities ended in late November 2019.

Source: ANAO analysis of Infrastructure information.

**Table A.4: BOF Phase 2 Wave 2 evaluation recommendations and actions taken**

Recommendation	Wave 3 actions
‘Further research is required to understand softening attitudes to infrastructure investment.’	Implemented — developmental research for Wave 3 considered attitudes to infrastructure investment.
‘A new creative approach is required. Key elements to consider are understanding the importance of infrastructure and increasing personal relevance, such as through localised content.’	Implemented — Wave 3 contained a new creative approach.
‘Video content is key for any future Building Our Future advertising campaigns.’	Largely implemented — while Wave 3 contained a high proportion of video content, some states had little or no video content, which impacted campaign reach in those states (see paragraph 3.79).

Recommendation	Wave 3 actions
'Demographic targeting could be used to reach younger audiences online.'	Implemented — Wave 3 used more digital media, including media that allowed demographic targeting.

Source: ANAO analysis of Infrastructure information.