

Overseas Crisis Management and Response: The Effectiveness of the Department of Foreign Affairs and Trade's Management of the Return of Overseas Australians in Response to the COVID-19 Pandemic

Department of Foreign Affairs and Trade

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Canberra ACT

21 June 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 in the Department of Foreign Affairs and Trade. The report is titled *Overseas Crisis Management and Response: The Effectiveness of the Department of Foreign Affairs and Trade's Management of the Return of Overseas Australians in Response to the COVID-19 Pandemic*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit to the Parliament.

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

Yours sincerely



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

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Audit snapshot

Auditor-General Report No.39 2021–22

Overseas Crisis Management and Response: The Effectiveness of the Department of Foreign Affairs and Trade's Management of the Return of Overseas Australians in Response to the COVID-19 Pandemic



Why did we do this audit?

- ▶ DFAT has supported the return of overseas Australians affected by the COVID-19 pandemic since February 2020.
- ▶ There is strong public and parliamentary interest in gaining assurance over the effectiveness of DFAT's crisis and consular response to COVID-19.
- ▶ This Auditor-General report is part of the ANAO's multi-year strategy that focuses on the effective, efficient, economical and ethical delivery of the Australian Government's response to the COVID-19 pandemic.



What did we find?

- ▶ DFAT adapted its crisis management arrangements and established a new program of activity to support a large number of overseas Australians affected by COVID-19.
- ▶ DFAT's preparedness to manage complex crises before the onset of the pandemic was partly effective.
- ▶ DFAT's ability to return Australians was affected by a number of constraints. It did not meet all of the government's objectives. Reporting to government on returning Australians could not be verified.



Key facts

- ▶ DFAT is responsible for providing consular and crisis management services to Australians overseas.
- ▶ DFAT's response to COVID-19 included providing Australians overseas with access to flights to return to Australia and financial assistance.
- ▶ DFAT consular funding to assist Australians overseas increased by 64 per cent between 2018–19 and 2021–22.



What did we recommend?

- ▶ There were nine recommendations to DFAT relating to: planning; governance; policies and procedures; procurement; workforce management; complaints handling; the use of data; and records management.
- ▶ DFAT agreed to seven recommendations.

150

Facilitated Commercial Flights (FCFs) (22 October 2020 to 24 February 2022).

\$60.4m

Flight costs under contract (Qantas Airways and Singapore Airlines) (as at 6 June 2022).

5171

Number of financial assistance loans (2 September 2020 to 25 January 2022).

Summary and recommendations

Background

1. Since its emergence in late 2019, coronavirus disease 2019 (COVID-19) has become a global pandemic that continues to impact on human health and national economies. Measures implemented throughout the world to limit its spread have affected Australians and Australian interests overseas. Border closures led to a significant contraction in international air traffic and reduced options for Australians seeking to return to Australia.¹
2. The Australian Government Crisis Management Framework (AGCMF) sets out standing arrangements for coordinating whole-of-government emergency responses for which the Commonwealth Government has responsibility. Under the AGCMF, the Department of Foreign Affairs and Trade (DFAT) is responsible for providing consular and crisis management services to Australians overseas.²
3. DFAT's response to COVID-19 has included providing Australians overseas with access to flights to return to Australia and financial assistance. As the pandemic remains present worldwide, this report is a point in time assessment of DFAT's management of the return of overseas Australians in response to the COVID-19 pandemic.

Rationale for undertaking the audit

4. The COVID-19 pandemic and the pace and scale of the Australian Government's response impacts on the risk environment faced by the Australian public sector. There is strong public and parliamentary interest in gaining assurance over DFAT's ability to manage the government's response to COVID-19, as well as other international crises.
5. Aspects of DFAT's crisis management capabilities were reviewed by the ANAO in 2015 as part of an audit of its provision of consular services.³ The current performance audit examines DFAT's crisis management arrangements in detail. It was conducted under phase two of the ANAO's multi-year strategy that focuses on the effective, efficient, economical and ethical delivery of the Australian Government's response to the COVID-19 pandemic.

Audit objective and criteria

6. The objective of the audit was to assess the effectiveness of DFAT's overseas crisis management and response arrangements in meeting the government's objectives for returning Australians from overseas in response to the COVID-19 global pandemic. To form a conclusion against the objective, the ANAO adopted the following high-level audit criteria:

-
- 1 This audit report uses the term 'Australians' to refer to both Australian citizens and permanent residents, as these categories of people have received the same services during the COVID-19 pandemic.
 - 2 The framework is managed by the Department of the Prime Minister and Cabinet. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], PM&C, Canberra, 2021, available from <https://www.pmc.gov.au/sites/default/files/publications/aus-gov-crisis-management-framework-v3-1-2.pdf> [accessed 9 February 2022]. The version in place at the beginning of the COVID-19 pandemic was version 2.2, published December 2017.
 - 3 See Chapter 5, Auditor-General Report No.21 2014–15 *Delivery of Australia's Consular Services*, pp. 103–117.

- Was DFAT appropriately prepared to manage the return of overseas Australians, as part of its response to the COVID-19 pandemic?
- Has DFAT responded effectively to achieve the government's objectives for managing the return of overseas Australians during the COVID-19 pandemic?

Conclusion

7. DFAT adapted its crisis management arrangements and established a new program of activity to provide assistance to a large number of overseas Australians affected by COVID-19, although it did not meet key government objectives. DFAT's underlying crisis management structures and capabilities require strengthening to ensure it is prepared to respond to future major and complex crises.

8. DFAT's preparedness to manage complex crises before the onset of the pandemic was partly effective. While crisis management arrangements align with whole-of-government requirements, DFAT lacks a defined crisis management framework and mature preparedness policies. There is scope to strengthen crisis management planning, capability development and assurance processes over DFAT's crisis management capability.

9. DFAT applied its crisis management arrangements to support the return of Australians and adapted these to deliver a new program of flights and financial assistance. The pandemic has highlighted weaknesses in responding to standard and complex, and large-scale crises. While policy advice to the government was largely appropriate, DFAT's reporting to government on its return of Australians could not be verified by the ANAO.

Supporting findings

Crisis preparedness (Chapter 2)

10. DFAT's crisis management policies and activities align with whole-of-government requirements. DFAT has not established a crisis management framework that shows how its arrangements and processes operate together as an integrated crisis response system. Such a framework would enable DFAT to better demonstrate that its arrangements are fit-for-purpose. (See paragraphs 2.3–2.18)

11. DFAT does not have processes for setting objectives for preparedness that would enable it to determine how ready it is to respond to crises and sustain responses over time. In setting objectives, DFAT should ensure planning and resourcing is clearly informed by the assessment of strategic and operational risks. There is a need for DFAT to more clearly document roles and responsibilities for crisis management and to improve its recording of critical decisions taken during crises. (See paragraphs 2.21–2.54)

12. Departmental oversight and reporting of assurance activities is insufficient to provide assurance of crisis preparedness. Assurance activities undertaken by posts include the review of crisis plans and exercises and certifications of preparedness. These are not consistently implemented as intended. There is limited assurance over the preparedness of Canberra-based response functions and the crisis management system as a whole. (See paragraphs 2.55–2.99)

13. DFAT's enterprise-level risk processes identify key consular and crisis management risks. There is a need for greater testing of controls to ensure mitigations are effective in reducing the department's exposure to risk. Processes for identifying and documenting post-level controls require strengthening. DFAT does not systematically identify and treat crisis-related risks and vulnerabilities which may affect its global network of posts. (See paragraphs 2.100–2.126)

Crisis response (Chapter 3)

14. DFAT provided largely appropriate policy advice to the government to inform decision-making and to set directions. Advice was timely and identified key factors and risks relevant to successful implementation. A consistent approach to analysing demand for assistance over the course of the pandemic would have strengthened advice to government on response activity. (See paragraphs 3.3–3.19)

15. DFAT was largely effective in applying its existing crisis management arrangements to respond to government tasking for the return of overseas Australians. DFAT's effectiveness in responding to the COVID-19 crisis was reduced by weaknesses in its existing crisis workforce policies and processes. (See paragraphs 3.20–3.53)

16. DFAT provided support to overseas Australians to return to Australia from January 2020. After a pause in flights activity from July 2020 to October 2020, DFAT built on existing consular processes to provide assistance through a new program of flight activity and financial assistance. DFAT's delivery of flights to return overseas Australians was largely effective. It did not maintain reliable data on registered Australians, including those identified as vulnerable. Before October 2020, it did not maintain authoritative records or accurate data on Australians supported to access flights. (See paragraphs 3.56–3.99)

17. DFAT was largely effective in engaging with overseas Australians. It provided timely and relevant information to Australians about: travel risks; government assistance; and means of returning to Australia using a range of channels. DFAT's monitoring and evaluation of the effectiveness of its engagement with overseas Australians was limited. While the department responded to a large volume of correspondence from overseas Australians, it does not have appropriate systems and processes to respond to complaints. (See paragraphs 3.100–3.128)

18. DFAT data and reporting indicate it did not meet all of the government's objectives. The ANAO could not verify DFAT reporting on: the number of Australians and vulnerable Australians it assisted to return to Australia; and Australians who accessed facilitated commercial flights administered by DFAT. Reporting could not be verified due to data quality issues and unclear methods underpinning its reporting on Australians registered with DFAT. (See paragraphs 3.132–3.159)

Recommendations

- Recommendation no. 1**
Paragraph 2.19
- DFAT consolidate its policy and guidance for crisis management, drawing on the Australian Government Crisis Management Framework. The framework should set out key crisis management functions and assign clear accountability for these, and for the development and assurance of key capabilities.
- Department of Foreign Affairs and Trade response:** *Agreed.*
- Recommendation no. 2**
Paragraph 2.30
- DFAT establish whole-of-department preparedness guidance to support crisis response and capability planning processes, linked to assessments of risk and supported by means of measuring and reporting on effectiveness.
- Department of Foreign Affairs and Trade response:** *Agreed.*
- Recommendation no. 3**
Paragraph 3.29
- DFAT establish a data and information strategy and capability to strengthen its capacity to rapidly and effectively source, analyse and use data from all sources for crisis planning and response.
- Department of Foreign Affairs and Trade response:** *Agreed.*
- Recommendation no. 4**
Paragraph 3.54
- DFAT plan for and build a fit-for-purpose crisis management workforce strategy and ensure appropriate systems are implemented to support the management of staff during crisis response.
- Department of Foreign Affairs and Trade response:** *Agreed.*
- Recommendation no. 5**
Paragraph 3.64
- DFAT develop emergency procurement guidelines to support officials to meet their obligations when paragraph 2.6 of the Commonwealth Procurement Rules (CPRs) is set aside during a crisis.
- Department of Foreign Affairs and Trade response:** *Disagreed.*
- Recommendation no. 6**
Paragraph 3.80
- DFAT develop clear policies and procedures for assessing and recording vulnerability to ensure it is able to appropriately demonstrate the basis of its decision-making on the provision of benefits to the public.
- Department of Foreign Affairs and Trade response:** *Agreed.*
- Recommendation no. 7**
Paragraph 3.119
- DFAT capture and retain accurate and complete data from its engagement with clients, in accordance with government information management standards, and for the purposes of monitoring its effectiveness in engaging with the public.
- Department of Foreign Affairs and Trade response:** *Agreed.*

Recommendation no. 8 DFAT establish a complaints handling model that enables it to appropriately manage consular complaints across the department, during periods of standard operations and crisis, in accordance with Commonwealth requirements and better practice principles.

Paragraph 3.129

Department of Foreign Affairs and Trade response: *Agreed.*

Recommendation no. 9 DFAT develop, implement and routinely test a fit-for-purpose crisis registration system that sufficiently validates registrant data to support business planning, program evaluation and reporting.

Paragraph 3.154

Department of Foreign Affairs and Trade response: *Disagreed.*

Summary of entity response

19. The proposed audit report was provided to DFAT. The full response, including ANAO's comment on this is reproduced at Appendix 1. The summary response is reproduced below.

During the COVID-19 pandemic, the Department of Foreign Affairs and Trade's (DFAT) established crisis framework enabled it to assist 61,755 Australians to return and facilitate 227 flights. This assistance was frequently reported to government.

The scale and complexity of the pandemic was unprecedented. In its largest ever consular response, DFAT worked with other government agencies and airlines, responding to evolving international border settings, State and Territory managed quarantine and incoming passenger caps. Many of these factors worked against DFAT's effort to return Australians.

ANAO's framing of the government's objectives focuses narrowly on the period of 18 September 2020 to 25 December 2020. At that time, 26,200 Australians had registered as seeking to return; by Christmas, more than 24,800 had returned.

DFAT's response would not have been possible without the dedication of its staff in Australia and overseas, often working in arduous conditions.

The circumstances of the pandemic were extraordinary and there are lessons to learn. Many of ANAO's suggestions are already being addressed through DFAT's consular modernisation and workforce management agendas.

Key messages from this audit for all Australian Government entities

20. 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.

Governance and risk management

- Entities can increase their preparedness for crises by conducting regular strategic assessments of their operating environment to identify risks and potential impacts.
- Documenting crisis management functions, policies, processes and performance expectations allows an entity to more systematically plan and implement capabilities and test these.

Policy/program design

- Communication with the public should be regularly evaluated to ensure it is effective in influencing citizen behaviour during crises and maintaining confidence in government actions.

Performance and impact measurement

- When implementing government programs entities should ensure data is accurate and reliable.

Records management

- Entities with crisis management responsibilities should ensure key operational decisions and the basis of these are documented to support transparency and accountability in the management of critical events which impact on citizen lives.

Audit findings

1. Background

Introduction

1.1 Since its emergence in late 2019, coronavirus disease 2019 (COVID-19) has become a global pandemic that continues to impact on human health and national economies. On 21 January 2020, the Australian Government listed COVID-19 as a disease of pandemic potential under the *Biosecurity Act 2015* (Cth).⁴ The World Health Organization (WHO) declared COVID-19 to be a ‘public health emergency of international concern’ on 30 January 2020.⁵

1.2 In February 2020, the Australian Government commenced the introduction of a range of policies and measures in response to the emergence of COVID-19. On 18 March 2020, the Governor-General of the Commonwealth of Australia declared that a human biosecurity emergency exists.⁶

1.3 COVID-19 measures implemented throughout the world have affected Australians and Australian interests overseas. The Australian Government Crisis Management Framework (AGCMF) sets out standing arrangements for coordinating whole-of-government emergency responses for which the Commonwealth Government has responsibility.⁷ Under the AGCMF, the Minister for Foreign Affairs is the lead minister for coordinating whole-of-government responses to international crises. The Secretary of the Department of Foreign Affairs and Trade (DFAT) is the lead senior official.

Consular and crisis management services

DFAT’s role

1.4 DFAT is responsible for providing consular and crisis management services to Australians overseas.⁸ The scope of services provided by the department is determined by Australian Government policy and set out in its *Consular Services Charter*, and includes support in cases of

4 *Biosecurity (Listed Human Diseases) Amendment Determination 2020* (Cth) [Internet], 21 January 2020, available from <https://www.legislation.gov.au/Details/F2020L00037> [accessed 25 June 2021].

5 TA Ghebreyesus, (Director-General for the World Health Organization), ‘WHO Director-General’s statement on IHR Emergency Committee on Novel Coronavirus (2019-nCoV)’ [Internet], media release, Geneva, 30 January 2020, available from <https://www.who.int/director-general/speeches/detail/who-director-general-s-statement-on-ih-er-emergency-committee-on-novel-coronavirus> [accessed 30 November 2021].

6 *Biosecurity (Human Biosecurity Emergency) (Human Coronavirus with Pandemic Potential) Declaration 2020* (Cth) [Internet], 18 March 2020, available from <https://www.legislation.gov.au/Details/F2020L00266> [accessed 25 June 2021]. The emergency declaration was extended on 15 May 2020, 4 September 2020, 11 December 2020, 3 March 2021, 11 June 2021 and on 2 September 2021 to 17 December 2021.

7 Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], PM&C, Canberra, 2021, available from <https://www.pmc.gov.au/sites/default/files/publications/aus-gov-crisis-management-framework-v3-1-2.pdf> [accessed 9 February 2022].

8 Outcome 2 of DFAT’s Portfolio Budget Statements is ‘the protection and welfare of Australians abroad and access to secure international travel documentation through timely and responsive travel advice and consular and passport services in Australia and overseas’. The provision of consular services contributes to Outcome 2.1 under Outcome 2. See Department of Foreign Affairs and Trade, *Portfolio Budget Statements 2021–22* [Internet], DFAT, Canberra, 2021, pp. 43–44, available from <https://www.dfat.gov.au/sites/default/files/pbs-2021-22-foreign-affairs-and-trade-portfolio-budget-statements-2021-22.pdf> [accessed 8 December 2021].

accident, serious illness or death.⁹ Consular assistance is generally only available to Australian citizens. During crisis events services may be extended to permanent residents.¹⁰ This audit report uses the term 'Australians' to refer to both Australian citizens and permanent residents, as these categories of people have received the same services during the pandemic.

1.5 DFAT's Consular and Crisis Management Division (CCD) coordinates the department's delivery of consular services and responses to international crises. It reports to the Deputy Secretary of Security, Legal and Consular Group.¹¹

1.6 DFAT posts are often the first point of contact for overseas Australians seeking government assistance and have a key role in the provision of services.¹² At 30 June 2021, the Australian Government's global network of overseas missions comprised 122 posts in 85 countries and 49 consulates in 45 countries. A total of 3098 staff worked in Australia, with 856 employees posted overseas. DFAT employed 2180 Locally Engaged Staff in overseas missions.¹³

1.7 DFAT reported that it provided consular services to 41,133 Australians in 2019–20.¹⁴ For 2020–21, DFAT reported that it had provided consular services to 38,784 Australians, which included assisting over 23,000 Australians to return to Australia.¹⁵ During the period of the pandemic, DFAT responded to a number of crisis events affecting Australians abroad, including: cyclones in the Pacific; an explosion in Beirut; and events in Afghanistan, Myanmar, the Solomon Islands, Ethiopia, Tonga and Ukraine.

1.8 Funding allocated to DFAT to support Australians overseas has increased since the start of the COVID-19 pandemic. Consular funding of \$646.7 million over the forward estimates allocated in 2021–22 represents an increase of 64 per cent since 2018–19. Funding allocations for consular services between 2018–19 and 2021–22 are shown in Appendix 3.

Crisis management capability

1.9 DFAT defines crises as 'complex events that have a significant impact on post(s), a number of divisions, and other agencies, and require activation of the department's full suite of crisis

9 Department of Foreign Affairs and Trade, *Consular Services Charter* [Internet], DFAT, Canberra, 2021, available from <https://www.smartraveller.gov.au/consular-services/consular-services-charter> [accessed 21 October 2021].

Consular services are not governed by Australian domestic law. Australia is a signatory to the *Vienna Convention on Consular Relations (1963)* which establishes international norms for consular practice and support to citizens who experience difficulties in a foreign nation.

10 Australian permanent residents are eligible to receive assistance if an immediate family member who was an Australian citizen applies on their behalf. DFAT advised the ANAO that, where practical, Australian permanent residents will be provided the same consular support as Australian citizens.

11 Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], DFAT, Canberra, 2020, p. 8, available from <https://www.dfat.gov.au/sites/default/files/dfat-annual-report-2020-21.pdf> [accessed 1 November 2021].

12 DFAT posts or 'missions' may be embassies, high commissions, consulate-general and representative offices. Consulates are headed by Honorary Consuls who provide consular services on behalf of Australia. Nine posts and two consulates are managed by Austrade. Consular assistance is also provided in an additional 18 countries by 13 Canadian missions under a bilateral agreement. Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], pp. 252–255.

13 Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], p. 124.

14 DFAT did not report separately on Australians assisted through services related to the COVID-19 pandemic.

15 Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], p. 93.

response resources'. Examples of crises are terrorist attacks, major accidents, pandemics and natural disasters.

1.10 The AGCMF requires entities to be prepared for a crisis and able to respond, with arrangements in place to ensure that, should a crisis occur:

- the required resources, capabilities and services can be efficiently mobilised and deployed; and
- actions are taken in anticipation of, during, or immediately after a crisis to ensure that its effects are minimised, and that those affected are given relief and support as quickly as possible.¹⁶

1.11 An entity's arrangements for crisis response should already be in place and well-practised before a crisis occurs.¹⁷ Preparedness also involves longer-term planning to develop capabilities relevant to responding to future crises. DFAT's approach to preparedness is discussed in Chapter 2. DFAT's crisis response arrangements and processes, including to support the return of overseas Australians, are examined in Chapter 3.

1.12 The AGCMF states that 'there is no standard response'.¹⁸ A number of organisational functions underpin an entity's crisis management capability and allow it to respond to different types of crises.¹⁹

1.13 The ANAO reviewed Australian and international crisis and emergency management policies and research to identify functions which typically make up an entity's crisis management capability.²⁰ This report examines DFAT's crisis management activities with reference to the core functions identified by the ANAO, as set out in Table 1.1 below.

Table 1.1: Core crisis management functions

Function	Purpose
Early warning and intelligence ^a	<ul style="list-style-type: none"> • Detect a crisis event, assess its significance and communicate critical information to decision-makers. Monitor the crisis to develop a clear picture of its scope and features to support decision-making and planning for response.

16 Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], p. 12.

17 'The organization should develop a concise crisis management plan that can be understood, implemented and exercised before it is needed'. See International Organization for Standardization, 'Security and Resilience — Crisis Management — Guidelines for a Strategic Capability' (draft), ISO/DIS 22361, ISO, Geneva, 2021, p. 13.

18 Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], p. 5.

19 'The organization should prepare for crises by developing generic capabilities that will enable the organization to deliver an appropriate response in any situation'. International Organization for Standardization, 'Security and Resilience — Crisis Management — Guidelines for a Strategic Capability' (draft), p. 12.

20 The Department of Defence defines capability as 'the ability to achieve a desired operational effect in a specific environment within specified time, and to sustain that effect for a designated period'. Department of Defence, *Capability Lifecycle Manual*, version 2.1 [Internet], Defence, Canberra, 2020, p. 1, available from <https://www.dica.org.au/wp-content/uploads/2020/10/Capability-Life-Cycle-Manual-v2-1.pdf> [accessed 22 October 2021]. See also Department of Home Affairs, *Australian Disaster Preparedness Framework* [Internet], Home Affairs, Canberra, 2018, p. 8, available from <https://www.homeaffairs.gov.au/emergency/files/australian-disaster-preparedness-framework.pdf> [accessed 22 October 2021].

Function	Purpose
Direction, control and adaptation	<ul style="list-style-type: none"> Set a direction for response by specifying objectives and developing appropriate strategies, plans and actions. Control the execution of crisis response. Scale, manage and adapt responses, as needed to meet response objectives. Learn from experience to improve the effectiveness of response activities.
Coordination of effort	<ul style="list-style-type: none"> Ensure unified and coordinated implementation of strategies and plans. Engage other sectors or entities and the public in the implementation of the response. Mobilise human and physical resources, services, facilities and equipment to achieve agreed objectives.
Communication	<ul style="list-style-type: none"> Disseminate clear, targeted and tailored information to those at risk and to support decision-making by all stakeholders. Manage internal, ministerial, cross-entity, media and public channels of communication to achieve crisis response objectives.

Note a: This function is sometimes referred to as establishing the 'common operating picture'. See Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning* [Internet], Home Affairs, EMA, Canberra, 2021, p. 15, available from <https://www.homeaffairs.gov.au/emergency/files/casp-guidebook.pdf> [accessed 5 February 2022]. The AGCMF outlines arrangements for establishing a National Joint Operating Picture to provide near real-time situational awareness of events and improving visibility of the impacts and consequences of hazards events. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], p. 31.

Source: ANAO analysis of publicly available information.

1.14 There is no single accepted standard for assessing national crisis management capabilities or consular response activity.²¹ The ANAO's primary points of reference for this audit have been domestic crisis and emergency management frameworks.

Australian Government travel assistance

Return of Australians overseas

1.15 In the first three months of 2020, most countries closed their borders to non-citizens and non-residents.²² The Australian Government implemented restrictions on inward and outward

21 See K Tindall and P't Hart, 'Evaluating government performance during consular emergencies: toward an analytical framework', *Policy and Society*, 30 (2), 2011, p. 138.

22 The Pew Research Center, a United States based think-tank, reported at the beginning of April 2020 that 91 per cent of the world's population lived in countries with partial or near complete travel restrictions on non-citizens and non-residents arriving from other countries. P Connor, *More than nine-in-ten people worldwide live in countries with travel restrictions amid COVID-19* [Internet], Pew Research Centre, Washington, 2020, available from <https://www.pewresearch.org/fact-tank/2020/04/01/more-than-nine-in-ten-people-worldwide-live-in-countries-with-travel-restrictions-amid-covid-19/> [accessed 19 October 2021].

travel in March 2020.²³ Border closures led to a significant contraction in international air traffic, reducing options for Australians seeking to return to Australia using commercial airlines.²⁴

1.16 In March 2020, DFAT estimated there were around 879,000 Australians abroad, with the largest numbers in New Zealand (119,900) and Indonesia (108,067).²⁵ It advised the government in November 2020, that due to the geographic spread of Australians across approximately 130 countries, it was unlikely to be able to address the needs of all overseas Australians.²⁶

1.17 In November 2020, around two thirds of Australians registered with DFAT were located in ten countries. The highest number of Australians registered with DFAT were in India and the United Kingdom. A table showing the top ten locations of Australians registered with DFAT, as at November 2020, is provided at Appendix 4.

1.18 On 10 July 2020, the Australian Government agreed to state and territory government requests to cap passenger arrival numbers at major international airports to alleviate pressure on hotel quarantine programs. The introduction of caps limited the number of people who could enter Australia and resulted in fewer international flights into Australia. This affected DFAT's activities in supporting Australians to return to Australia.²⁷

1.19 Between 1 April 2020 and 31 March 2021, 154,321 Australian citizens and 47,938 permanent residents arrived in Australia.²⁸

DFAT assistance to overseas Australians

1.20 DFAT's provision of assistance to overseas Australians seeking to return to Australia has occurred in two main phases. An overview of key events is below, with a detailed timeline provided at Appendix 5.

23 On 20 March 2020, the Australian Government implemented travel restrictions on foreign nationals entering Australia. A ban on Australians travelling overseas was implemented on 25 March 2020. Refer to Auditor-General Report No.12 2020–21 *Management of International Travel Restrictions during COVID-19*, for a detailed examination of national border conditions.

24 International scheduled passenger traffic in 2020–2021 was 1.2 million compared to 30.7 million in 2019–20 and 42.1 million in 2018–19. The decrease compared to 2018–19 was 97.3 per cent. See Department of Infrastructure, Transport, Regional Development and Communications, Bureau of Infrastructure and Transport Research Economics, *International airline activity 2020–21, Statistical report*, DITRDC, Canberra, 2021, p. 4.

25 The figure was derived from Australia Bureau of Statistics (ABS) reporting 'Overseas arrivals and departures, Australia' for January 2019 to March 2019. Prior to the closure of Australia's borders in March 2020, there were around 8.5 million trips from Australia in 2019–2020. See Australian Bureau of Statistics, *Overseas arrivals and departures* [Internet], Australia, ABS, Canberra, 2021, available from <https://www.abs.gov.au/statistics/industry/tourism-and-transport/overseas-arrivals-and-departures-australia> [accessed 21 October 2021].

26 DFAT reported that there were 78 countries each with fewer than 10 registered Australians.

27 The Department of Infrastructure, Transport, Regional Development and Communications (DITRDC) placed conditions on airline timetables under the *Air Navigation Regulations 2016* to limit the number of passengers airlines could carry.

28 See Auditor-General Report No.12 2020–21 *Management of International Travel Restrictions during COVID-19*, paragraph 3.60 and Table 3.3.

Phase 1: January 2020–September 2020

1.21 Following alerts from the WHO in January 2020, DFAT issued several travel advisories, extending their level and geographic coverage.²⁹ Travel advice was issued to Australians to exercise a high degree of caution for Wuhan, China on 21 January 2020. The travel advisories for all destinations were elevated to the highest level (Level 4 — ‘Do not travel’) on 18 March 2020.

1.22 DFAT managed two evacuations of Australians from Wuhan (3 and 9 February 2020) and also returned Australian passengers from the Diamond Princess cruise ship anchored in Tokyo on 19 February 2020. From March to June 2020, DFAT supported Australians to return via charter and commercial flight options from locations where it was assessed there were no viable commercial flight options.³⁰

1.23 The government introduced financial assistance for Australians identified by DFAT as vulnerable on 2 September 2020.³¹ On 18 September 2020, the Prime Minister stated:

Well, it's a question of who's looking to come home...for those who are seeking to come home, and particularly those who very much need to come home, we are prioritising them both in the financial support and other assistance we're doing through our consular offices...I would hope that those looking to come home, that we'd be able to do that within months and I would hope that we can get as many people home, if not all of them, by Christmas.³²

29 DFAT assigns each destination an official advice level reflecting the risk for average Australian travellers to the country. A higher level means higher risk. The levels are: Level 1 — ‘Exercise normal safety precautions’; Level 2 — ‘Exercise a high degree of caution’; Level 3 — ‘Reconsider your need to travel’; and Level 4 — ‘Do not travel’.

30 Locations spanned the United States, South America, North and Southeast Asia, India, Africa and Europe. Arranging flights involved: gaining access to foreign government charter flights; exemptions to restrictions on movement; and approvals for cruise liners to dock in other countries.

The government also committed \$130 million in April 2020 to support existing Qantas Airways (Qantas) and Virgin Airline services from four international hubs (London, Los Angeles, Hong Kong and Auckland) for one month, extending these arrangements for Los Angeles and London to 8 June 2020. Funds were allocated to DITRDC.

31 M Payne, (Minister for Foreign Affairs), ‘Helping Australians Overseas’ [Internet], media release, Parliament House, Canberra, 2 September 2020, available from <https://www.foreignminister.gov.au/minister/marise-payne/media-release/helping-australians-overseas> [accessed 26 October 2021].

32 S Morrison, (Prime Minister), ‘Press conference’ [Internet], media statement, Sydney, 18 September 2020, available from <https://www.pm.gov.au/media/press-conference-sydney-nsw-5> [accessed 22 February 2022].

The Prime Minister also stated the government would provide flights or other assistance for around 4000 people registered as vulnerable at that time.³³ The government reiterated its commitment to returning Australians by Christmas on 23 and 28 October 2020.³⁴

Phase 2: October 2020–February 2022

1.24 The government entered into an agreement with Qantas Airways (Qantas) for the provision of flights for 12 months from 13 October 2020. It agreed on 11 November 2020 to planning for 22 flights and announced a further 20 flights on 16 January 2021.

1.25 With the easing of international travel restrictions from 1 November 2021, DFAT closed its COVID-19 registration portal to new registrants. DFAT continued to support previously registered Australians to access contracted flights, which included engaging Singapore Airlines to operate 14 flights between 2 November 2021 and 24 February 2022. DFAT also continued to provide financial assistance to eligible Australians through the COVID-19 Special Overseas (Hardship) Program.

Approaches used by DFAT to return Australians

1.26 DFAT has used different approaches to providing flights assistance:

- support to overseas Australians to connect with regular commercial flights, within a foreign country and/or from a foreign country to Australia (DFAT-enabled departures);
- flights partially funded by DFAT and which would otherwise not have been scheduled by the airline (facilitated commercial flights, FCFs);
- flights chartered by DFAT for targeted evacuation operations (assisted departures); and
- providing financial assistance for emergency living expenses and airline tickets for eligible vulnerable Australians.

33 'We have got about just over 4,000, and this number has been coming down, how we would categorise through DFAT as being more vulnerable. Recently, several weeks ago, we provided additional funding to DFAT to assist these most vulnerable cases. That has meant in cases assisting them with air travel. It has also meant assisting them with accommodation or other needs that they might have'. See S Morrison, (Prime Minister), 'Press Conference' [Internet], media statement, Sydney, 18 September 2020, available from <https://www.pm.gov.au/media/press-conference-sydney-nsw-5> [accessed 27 October 2021].

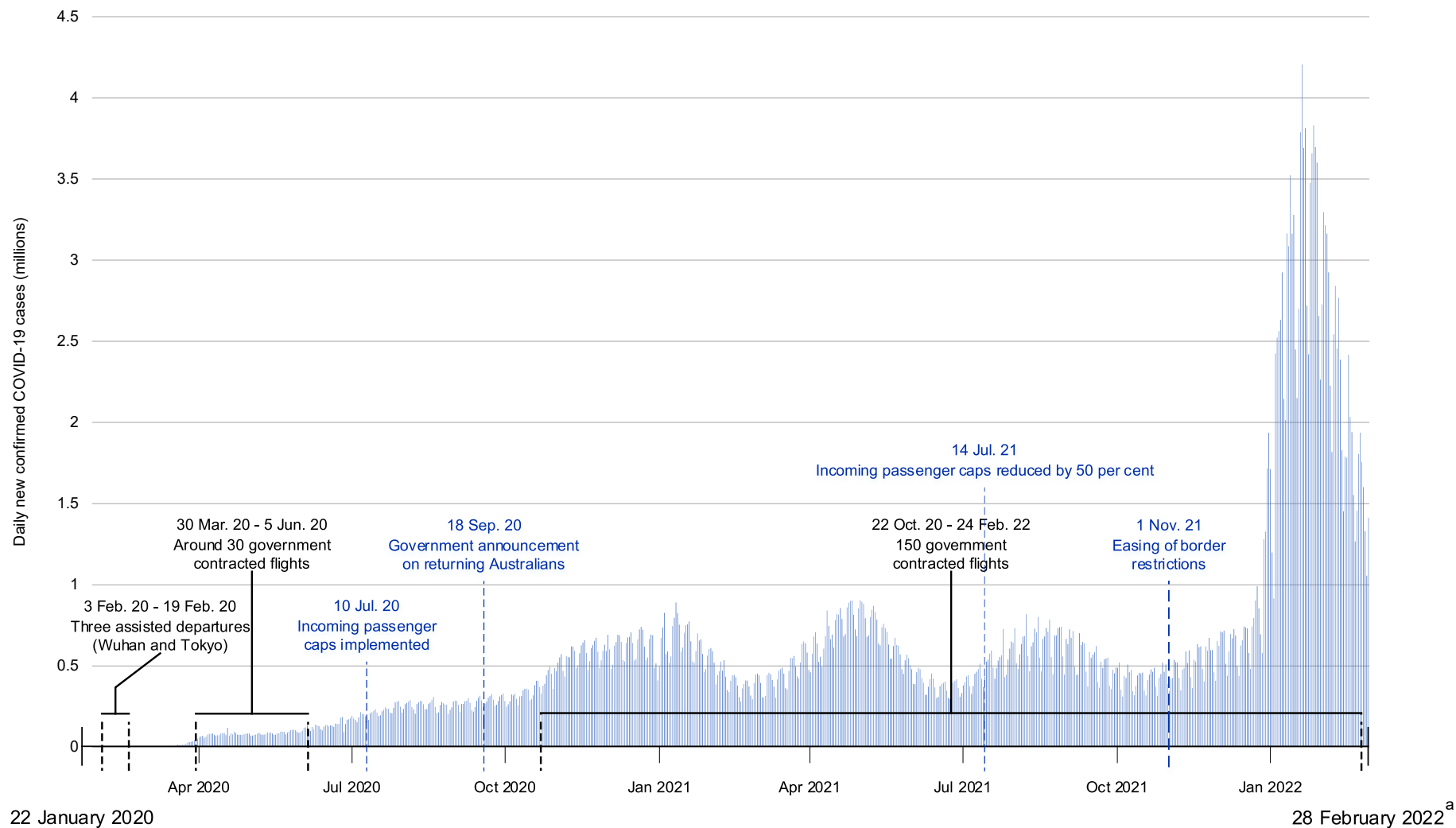
State and territory governments were requested at the national cabinet meeting on 23 October 2020 to increase quarantine spaces to support the return of vulnerable Australians. The government also announced an expansion of quarantine capacity in the Northern Territory and some limited increases in state and territory caps. See S Morrison, (Prime Minister), 'National Cabinet' [Internet], media statement, Canberra, 23 October 2020, available from <https://www.pm.gov.au/media/national-cabinet-1> [accessed on 27 October 2021].

34 'I can confirm when we made our commitment on the 18th of September. There were registered, some 26,200 Australians. 4,100 of those were vulnerable'. S Morrison, (Prime Minister), 'Press Conference' [Internet], media statement, Canberra, Parliament House, 23 October 2020, available from <https://www.pm.gov.au/media/press-conference-australian-parliament-house-act-27> [accessed 7 February 2022].

'It's our goal to get those 26,000 Australians home that were registered by Christmas'. 'The goal is to bring the people home who were registered with DFAT on 18 September, and as many Australians as we can in addition to that...'. M Payne, (Minister for Foreign Affairs), Senate Foreign Affairs, Defence and Trade Legislation Committee, Official Committee Hansard, Canberra, 28 October 2020, pp. 91, 102, available from https://www.aph.gov.au/Parliamentary_Business/Senate_estimates/fadt/2020-2021_Budget_estimates [accessed 7 February 2022].

1.27 The main phases of flights activity supported by DFAT are shown in Figure 1.1. This is set against key events relevant to DFAT's return of Australians and worldwide daily new COVID-19 case numbers from January 2020 to the end of February 2022.

Figure 1.1: DFAT flights activity against COVID-19 case numbers



Note a: COVID-19 data available from 22 January 2020 to 28 February 2022.

Source: ANAO analysis based on data provided by DFAT and COVID-19 case data from <https://ourworldindata.org/covid-cases> [accessed 2 March 2022].

Rationale for undertaking the audit

1.28 The COVID-19 pandemic and the pace and scale of the Australian Government's response impacts on the risk environment faced by the Australian public sector. There is strong public and parliamentary interest in gaining assurance over DFAT's ability to manage the Australian Government's response to COVID-19, as well as other international crises.

1.29 Aspects of DFAT's crisis management capabilities were reviewed by the ANAO in 2015 as part of an audit of its provision of consular services.³⁵ The current performance audit examines DFAT's crisis management arrangements in detail. It was conducted under phase two of the ANAO's multi-year strategy that focuses on the effective, efficient, economical and ethical delivery of the Australian Government's response to the COVID-19 pandemic.

Audit approach

Audit objective, criteria and scope

1.30 The objective of the audit was to assess the effectiveness of DFAT's overseas crisis management and response arrangements in meeting the Australian Government's objectives for returning Australians from overseas in response to the COVID-19 global pandemic. To form a conclusion against the objective, the ANAO adopted the following high-level audit criteria:

- Was DFAT appropriately prepared to manage the return of overseas Australians, as part of its response to the COVID-19 pandemic?
- Has DFAT responded effectively to achieve the government's objectives for managing the return of overseas Australians during the COVID-19 pandemic?

Audit methodology

1.31 The audit involved:

- reviewing Australian and international crisis and emergency management policies and research;
- reviewing entity documentation, including advice to government, policies, plans and procedures, and internal and external communications;
- reviewing and analysing DFAT's consular data management systems and data holdings, and its analysis and reporting of data to internal and external stakeholders;
- discussions with officers from DFAT business areas and Beijing, Manila, New Delhi and Pretoria posts³⁶; and
- the review of 241 citizen contributions received by the ANAO.

1.32 The audit was conducted in accordance with ANAO Auditing Standards at a cost to the ANAO of approximately \$804,000.

1.33 The team members for this audit were Judy Lachele, Michael Commens, Dr Cristiana Linthwaite-Gibbins, Dale Todd and Alex Wilkinson.

35 See Chapter 5, Auditor-General Report No.21 2014–15 *Delivery of Australia's Consular Services*, pp. 103–117.

36 This audit analysed crisis preparedness and response documentation from 11 posts: Bangkok, Beijing, Beirut, London, Manila, New Delhi, Port Moresby, Pretoria, Shanghai, Tehran and Washington. The selection of posts took into account the prevalence of COVID-19 and numbers of Australians in those locations.

2. Crisis preparedness

Areas examined

This chapter examines whether the Department of Foreign Affairs and Trade (DFAT) was appropriately prepared to manage major and complex crises, including the return of overseas Australians, as part of its response to the COVID-19 pandemic.

Conclusion

DFAT's preparedness to manage complex crises before the onset of the pandemic was partly effective. While crisis management arrangements align with whole-of-government requirements, DFAT lacks a defined crisis management framework and mature preparedness policies. There is scope to strengthen crisis management planning, capability development and assurance processes over DFAT's crisis management capability.

Areas for improvement

The ANAO made two recommendations aimed at: improving processes for setting crisis preparedness and capability development objectives; and strengthening arrangements for gaining assurance over preparedness. The ANAO also suggested that DFAT further develop its guidance for planning, resourcing and managing its crisis functions, and that it give appropriate attention to adhering to record-keeping policies.

2.1 Crisis preparedness is the basis of the government's ability to protect citizens when damaging events occur. Crisis response entities should have an appropriate base of knowledge and capability before the emergence of a crisis.³⁷ This involves maintaining key crisis management functions to respond and sustain response activities for as long as necessary to achieve government objectives.³⁸

2.2 This chapter examines DFAT's preparedness before the onset of the COVID-19 pandemic to manage major and complex crises, including pandemics. The ANAO examined whether DFAT has established and implemented appropriate policies and processes to ensure it is prepared to respond to crises, including:

- a framework to support its management of crisis response functions and activities;
- the use of risk-based approaches to planning for and managing crises; and
- oversight arrangements and activities to provide assurance over preparedness.

37 The International Organization for Standardization (ISO) defines preparedness as a function of 'programmes and systems developed and implemented prior to an incident that can be used to support and enhance prevention, protection from, mitigation of, response to and recovery from disruptions, emergencies or disasters'. See International Organization for Standardization, *Security and Resilience — Vocabulary* [Internet], ISO, Geneva, 2021, available from <https://www.iso.org/obp/ui/#iso:std:iso:22300:ed-3:v1:en> [accessed 8 December 2021].

38 'Capability' refers to the ability to deliver and sustain an effect within a specific context and timeframe, whereas 'capacity' refers to how long a capability can be sustained. The level of an entity's capability is determined by the combination of ability and capacity. See Department of Home Affairs, *Australian Disaster Preparedness Framework* [Internet], Home Affairs, Canberra, 2018, p. 8, available from <https://www.homeaffairs.gov.au/emergency/files/australian-disaster-preparedness-framework.pdf> [accessed 3 November 2021].

Did DFAT have a fit-for-purpose crisis management framework and arrangements in place to enable it to effectively manage crises?

DFAT's crisis management policies and activities align with whole-of-government requirements. DFAT has not established a crisis management framework that shows how its arrangements and processes operate together as an integrated crisis response system. Such a framework would enable DFAT to better demonstrate that its arrangements are fit-for-purpose.

Frameworks for preparing for crises

2.3 The Australian Government Crisis Management Framework (AGCMF) sets out whole-of-government arrangements for preventing, preparing for and responding to crises.³⁹ It requires entities to adopt an 'all hazards' approach to crisis management to ensure that 'the full spectrum of hazards that may affect life, property or the natural environment are considered'.⁴⁰

2.4 The ANAO examined whether DFAT's consular and crisis policies and arrangements align with the Australian Government's frameworks for crisis management, reflecting a coordinated approach to preparing for and responding to crises.⁴¹

Australian Government Crisis Management Framework

2.5 DFAT's crisis management policies align with requirements outlined by the AGCMF and include guidance on how it should interact with other government entities, the private sector and the community in managing responses.⁴²

2.6 DFAT policy requires it to adopt an 'all hazards' approach and to undertake specific activities to support the Minister for Foreign Affairs ('the Minister') under the AGCMF. These include⁴³:

- issuing and updating travel advice;
- providing advice to government on numbers of affected Australians overseas;

39 Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], PM&C, Canberra, 2021, p. 25, available from <https://www.pmc.gov.au/sites/default/files/publications/aus-gov-crisis-management-framework-v3-1-2.pdf> [accessed 9 February 2022].

40 *ibid.*, p. 9.

41 The Department of Home Affairs defines coordination as 'the bringing together of organisations and other resources to support emergency management response, relief and recovery...Activities of all stakeholders are synchronised and integrated'. See Australian Institute for Disaster Resilience, *Australian Emergency Management Arrangements Handbook* [Internet], AIDR, Canberra, 2019, available from https://www.aidr.org.au/media/1764/aidr_handbookcollection_australian-emergency-management-arrangement_web_2019-08-22_v11.pdf [accessed 3 November 2021].

42 These are: situational awareness; advice and data to support decision-making; communication strategies; and strategic coordination. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], p. 34.

43 Depending on the nature and scale of a crisis, the Prime Minister may decide to lead all or some elements of the government's preparation for, response to and recovery from a crisis.

- providing consular assistance to Australians and permanent residents, including citizens of consular partners⁴⁴; and
- activating financial assistance packages, including humanitarian funding to countries affected by international crises.

2.7 A key coordination mechanism available to the government is the Inter-Departmental Emergency Taskforce (IDETF), chaired by DFAT, which manages the Australian Government's response to and/or recovery from an international crisis.⁴⁵

National Communicable Disease Plan

2.8 The Minister and DFAT have responsibilities under the National Communicable Disease Plan (National CD Plan), which supports the AGCMF.⁴⁶ The National CD Plan is activated when the nature and scale of a health emergency requires a nationally coordinated approach.⁴⁷

2.9 While the National CD plan is specific to the health sector, it requires DFAT to provide information for Australians considering overseas travel and for Australians overseas when considering whether to return home. DFAT's responsibilities under the plan broadly align with those specified by the AGCMF.

2.10 The National CD Plan states that 'a process of exercising and review will be followed to ensure that this plan continues to match current needs and resources'.⁴⁸ Entities should also conduct regular reviews to ensure their internal plans and resourcing are appropriate to meeting their obligations under the National CD Plan.

2.11 DFAT's Pandemic Contingency Plan ('plan') at the time of the outbreak of COVID-19 had been last reviewed in 2014.⁴⁹ The plan did not consider national border restrictions or possible

44 DFAT defines 'consular partners' as countries with close diplomatic ties to Australia, including the United Kingdom, Canada, the United States of America, and New Zealand.

45 The IDETF is chaired by DFAT at Deputy Secretary-level. It may also be chaired by the Department of the Prime Minister and Cabinet.

46 The National CD Plan was activated on 25 February 2020 by the departments of Health, Prime Minister and Cabinet and Home Affairs on the basis of advice from the Chief Medical Officer. See Department of Health, *Australian Health Sector Emergency Response Plan for Novel Coronavirus (COVID-19 Plan)* [Internet], Health, Canberra, 2020, p. 13, available from https://www.health.gov.au/sites/default/files/documents/2020/02/australian-health-sector-emergency-response-plan-for-novel-coronavirus-covid-19_2.pdf [accessed 9 November 2021].

47 The National CD Plan states 'a clear understanding of responsibilities is essential to effective preparedness and will support quick mobilisation, integration and efficient use of resources, should an incident occur'. See Department of Health, *Australian Health Sector Emergency Response Plan for Novel Coronavirus (COVID-19 Plan)* [Internet], p. 13.

48 Ibid., p. 13.

49 While the plan did not specify a process or timeframe for revision, the plan's review log indicates it had been updated annually between 2009 and 2012.

requirements to evacuate Australians from overseas countries.⁵⁰ The plan's log of exercises indicates it had not been exercised since at least 2009.⁵¹

2.12 On 25 March 2020, DFAT endorsed a high-level Business Continuity — Pandemic Plan to support the international elements of the National CD Plan. It also identified 'continuing services for Australians' as one of three priorities for the department.⁵² While noting that 'a pandemic may occur for a prolonged period, impacting on the sustainability of...arrangements', it did not include projections of likely increases in demand for consular services from overseas Australians, including for assistance to return to Australia.

Coordination of crisis management within DFAT

2.13 DFAT does not have a single document which clearly explains its crisis management framework and sets out key crisis functions and accountabilities for these, such as those outlined in Table 1.1.

2.14 DFAT's *Australian Consular Handbook* (handbook) is its main source of guidance on policies, procedures and service level guidelines for the provision of consular services.⁵³ The handbook is divided into two volumes — 'Policy' and 'Operations' which, over a total of 68 chapters address: legal frameworks and international agreements; the appointment and status of consular officers; and the administration of different types of services.

2.15 Chapters 16 to 20 of the policy handbook provide information about arrangements and processes relevant to meeting DFAT's obligations under the AGCMF and National CD Plan. This information is not organised as a coherent framework and does not show how individual arrangements and processes are intended to be deployed as part of a coordinated system of crisis response.

2.16 DFAT advised the ANAO it uses an incident management structure to organise the activities of its crisis centre when this is activated to respond to a crisis event.⁵⁴ A diagram shows key functions and activities (such as information management, internal and external liaison, logistics, planning and financing activities), carried out at the direction of the appointed lead for managing the crisis. While this helps to explain key crisis management activities, it does not provide a framework that is sufficient as a basis for planning, managing and evaluating a crisis response system.

50 DFAT's Pandemic Influenza Contingency Plan was based on assumptions relating to an outbreak of avian influenza. It focused on the provision of consular services to Australians quarantined or hospitalised in other countries. Whole-of-government pandemic planning assumed Australian borders would not close for Australians.

51 WHO advice on pandemic preparedness states that 'an exercise programme is valuable in validating procedures, justifying resource allocation, enhancing understanding of the plan by those who use it, highlighting strengths and exposing opportunities for improvement which can then be addressed and incorporated into revisions of the plan after the exercise'. See World Health Organization, *Considerations on exercises to validate pandemic preparedness plans* [Internet], WHO, Geneva, 2008, available from <https://www.who.int/influenza/resources/documents/ExerciseConsiderations.pdf> [accessed 20 November 2021].

52 Other priorities were ensuring the welfare of staff and supporting the whole-of-government response to the pandemic.

53 The *Australian Consular Handbook — Operations* states that 'the policies, procedures, and service levels described in this handbook represent guidelines only and are not intended to create any legally binding duties or obligations on the Australian Government to provide any particular consular assistance or services'.

54 This structure is sometimes termed an 'Incident Command System'. The appointed lead may be referred to as the crisis or incident controller (see paragraph 3.36).

2.17 The ANAO reviewed arrangements and processes detailed in the handbook and other documents published on a 'Crisis Gateway' on DFAT's intranet to determine whether these accord with the standard functions of crisis management described in Table 2.1 below. The table indicates that DFAT has established arrangements for delivering crisis management capability.

Table 2.1: DFAT crisis management arrangements and processes identified in DFAT documents

Function	DFAT arrangement/process
Early warning and intelligence	<ul style="list-style-type: none"> The Global Watch Office (GWO) operates 24/7 to monitor media and developments at post, report on international events which may require a response by the Australian Government and provides whole-of-government messaging. The GWO forms part of AGCMF arrangements. DFAT's diplomatic cable system is used for communications between DFAT's Canberra office and posts during crisis events.
Direction, control and adaptation	<ul style="list-style-type: none"> DFAT chairs the Interdepartmental Emergency Taskforce under AGCMF arrangements. It uses taskforces and cross-government coordination mechanisms. Government briefing processes. Crisis planning processes and activation of Crisis Action Plan (CAP) processes at post.
Coordination of effort	<ul style="list-style-type: none"> DFAT may stand up a crisis centre and 'crisis cadre' to coordinate effort within the department and across government. The role of crisis manager may be executed by the head of CCD, another SES officer or shared. The Head or Deputy Head of mission is responsible for crisis response at post. Surge mechanisms are used to extend call centre capacity and support post response. Crisis Response Teams deploy overseas to assist a post's response to a crisis. DFAT may coordinate with other countries.
Communication	<ul style="list-style-type: none"> Smartraveller website communicates travel advice and bulletins to the public. Updates to travel information are provided via email and social media posts. Multiple channels are used to communicate with the public, including social media and SMS critical alerts. DFAT uses a range of systems to capture information about consular clients.

Source: ANAO analysis of data provided by DFAT.

2.18 There would be value in DFAT consolidating its different sources of guidance to show how individual mechanisms relate to core functions and how these operate together as a system for crisis planning and response.⁵⁵ DFAT would then be better placed to plan, implement and evaluate its crisis management capability. This would also provide assurance that it is able to meet its obligations under the AGCMF.

55 'The organization should adopt a structured approach to crisis management...To build a crisis management capability, the organization should establish a framework...management should define and document a policy for crisis management'. See International Organization for Standardization, 'Security and Resilience — Crisis Management — Guidelines for a Strategic Capability' (draft), pp. vi, 9, 10.

Recommendation no. 1

2.19 DFAT consolidate its policy and guidance for crisis management, drawing on the Australian Government Crisis Management Framework. The framework should set out key crisis management functions and assigns clear accountability for these, and for the development and assurance of key capabilities.

Department of Foreign Affairs and Trade response: *Agreed.*

2.20 *DFAT agrees consolidation of its existing crisis management framework and associated guidance into a single, integrated system will improve crisis preparedness and response, including clarity of responsibilities.*

Existing documents, including the Crisis Centre Incident Reporting Structure, Consular Policy Handbook and DFAT's procurement-related policies and guidelines, identify roles and responsibilities in Canberra and at post, and align with the overarching Australian Government Crisis Management Framework. DFAT's crisis management workforce strategy includes surge capacity through Crisis Response Teams and Crisis Cadre.

A consular modernisation program (underway) is strengthening consular service and crisis response delivery, including through upgraded ICT.

Future efforts will target improved crisis registration capability, data capture and performance monitoring. The program will also address labour intensive service delivery models while maintaining a high-level consular service to Australians overseas.

Does DFAT have adequate preparedness planning processes?

DFAT does not have processes for setting objectives that would enable it to determine how ready it is to respond to crises and sustain responses over time. In setting objectives, DFAT should ensure planning and resourcing is clearly informed by the assessment of strategic and operational risks. There is a need for DFAT to more clearly document roles and responsibilities for crisis management and to improve its recording of critical decisions taken during crises.

2.21 Before an entity can assure government that it is appropriately prepared to respond to crises it must first determine the scope and aims of preparedness. The AGCMF expresses the government's objective for crisis management in broad terms as the protection of human life and assets.⁵⁶ Entity planning involves setting operational objectives and priorities and organising activities to meet this obligation.

56 The version of the AGCMF in place at the onset of the pandemic was version 2.2, December 2017. The objectives of crisis management are stated in similar terms in the current version (3.1).

Establishing preparedness objectives

Preparedness policy

2.22 Responding effectively to a crisis relies on an entity's ability to deploy its capabilities, when needed.⁵⁷ Preparedness objectives are generally set with reference to:

- readiness — the ability, at short notice, to achieve specific tasks within expected timeframes; and
- sustainability — the ability to achieve objectives over a period of time.

2.23 While DFAT guidance refers to the need for 'effective and timely' crisis response, it does not set expectations of timeliness or advise on a process for estimating the level of effort and resourcing that may be needed to support effective response for the duration of a crisis. Setting preparedness objectives is a continuous process which involves reviewing objectives against changes and risks in the entity's operating environment.⁵⁸

Processes for preparedness planning

2.24 DFAT does not have mature processes at departmental level for setting and adjusting preparedness objectives to take account of near or longer-term risks in its operating environment.⁵⁹

2.25 Risk frameworks can help to anticipate emerging or longer-term sources of risk. As well as pandemics, crises situations could include a need to assist Australians in multiple countries affected by a global or regional conflict or natural disaster, or a requirement to respond to more than one significant crisis concurrently.

57 'Capability is the collective ability and power to deliver and sustain an effect within a specific context and timeframe. Capacity is the key determinant of how long a capability can be sustained at a particular level of ability'. See Department of Home Affairs, *Australian Disaster Preparedness Framework, A guideline to develop the capabilities required to manage severe to catastrophic disasters* [Internet], p. 8. For Defence sources see Auditor-General Report No.43 2009–10 *Army Individual Readiness Notice*, p. 11, and Department of Defence, *Capability Life Cycle Manual*, version 2.1 [Internet], Defence, Canberra, 2020, paragraph 1.8, available from <https://www.dica.org.au/wp-content/uploads/2020/10/Capability-Life-Cycle-Manual-v2-1.pdf> [accessed 30 November 2021].

58 As an example, the government issued the *2020 Defence Strategic Update* which set out changes in Australia's strategic environment and their implications for defence planning. The policy was aimed at ensuring that the government would be adequately prepared to 'deploy military power' when required. Department of Defence, *2020 Defence Strategic Update* [Internet], Defence, Canberra, 2020, p. 6, available from <https://www.defence.gov.au/about/publications/2020-defence-strategic-update> [accessed 30 November 2021].

See C Baubion, *OECD Working Papers on Public Governance, No. 23, OECD Risk Management: Strategic Crisis Management* [Internet].

59 In November 2020, DFAT's Executive agreed to discuss specific strategic risks over the course of 2021. These discussions did not take place. In October 2021, the Executive considered the re-opening of internal borders planned for 1 November 2021, with risks subsequently incorporated in the Enterprise Risk Register (ERR) for December 2021.

2.26 Risks may be identified through a range of processes and captured in government policy papers and statements⁶⁰, strategic assessments on specific topics, intelligence products or planning documents which consider a range of likely and ‘worst case scenarios’.⁶¹

2.27 Mitigating long term crises may require planning and investment in capabilities over several years. In 2015, the then Director-General of Emergency Management Australia wrote:

Though a return period for a catastrophic level disaster with a known hazard profile may be long (even up to 500 years and beyond), it is still sensible to envisage such events and properly plan for them. Failure to improve will lead to a significant capability gap.⁶²

For example, the United Kingdom’s (UK) national-level risk assessment process does not attempt to detail every possible hazard or threat that could affect a significant part of the country. Instead, it seeks to capture a wide range of impacts.⁶³ This involves the analysis of long-term trends that could bring about changes in risks affecting the UK such as health, geopolitics and technology.⁶⁴ Preparedness involves the development of plans at national, departmental and local levels flexible enough to address known risks and provide a starting point for handling unforeseen events.⁶⁵

Assurance over preparedness

2.28 As DFAT has not defined preparedness and criteria for determining levels of preparedness, it cannot provide assurance to government on its ability to respond to a range of crisis scenarios. Such assurance would involve outlining the type, scale, or severity of crises to which it is able to respond, and the level of capability and resourcing that may be required to meet future government expectations.

2.29 Both the lack of a single document which clearly explains its crisis management framework (see paragraphs 2.13–2.18) and a working definition of preparedness prevent DFAT from testing

60 Examples are Australian Government White Papers, key ministerial speeches or policy papers. In 2020, the Australian Government published the *2020 Defence Strategic Update*. The paper set out key developments in Australia’s strategic environment and its implications for Defence planning. See Department of Defence, *2020 Defence Strategic Update* [Internet].

61 See Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning* [Internet], p. 8.

The United Kingdom government has had a national-level risk assessment process in place since 2005. It assesses the most serious risks for the United Kingdom or its interests overseas for the next two years using horizon scanning, other analytical techniques and processes of consultation with stakeholders and experts. It’s classified national risk register informs operational planning and resourcing for civil emergencies. See United Kingdom National Audit Office, *The government’s preparedness for the COVID-19 pandemic: lessons for government on risk management* [Internet], UKNAO, London, 2021, pp. 6, 14, available from <https://www.nao.org.uk/report/the-governments-preparedness-for-the-covid-19-pandemic/> [accessed 8 December 2021].

62 M Crosweller, ‘Improving our capability to better plan for, respond to, and recover from severe-to-catastrophic level disasters’, *Australian Journal of Emergency Management*, 30 (4), 2015, pp. 44–45. Mr Crosweller also notes that preparing for crises requires an entity to balance readiness to respond to frequent low impact crises with measures to manage higher-impact crises that are less likely to occur.

63 See United Kingdom National Audit Office, *The government’s preparedness for the COVID-19 pandemic: lessons for government on risk management*, paragraph 1.6, p. 16.

64 Ibid., paragraph 1.8, p. 18.

65 Ibid., pp. 4, 33–34. Crisis Action Plans used by DFAT posts set out planning which is flexible to enable a response to identified risks and allow for an ‘all hazards’ approach. This aligns with UK policy.

the preparedness of each function, and the effectiveness of the response system as a whole.⁶⁶ DFAT assurance processes are discussed in more detail at paragraphs 2.55 to 2.99.

Recommendation no. 2

2.30 DFAT establish whole-of-department preparedness guidance to support crisis response and capability planning processes, linked to assessments of risk and supported by means of measuring and reporting on effectiveness.

Department of Foreign Affairs and Trade response: *Agreed.*

2.31 *DFAT has existing whole-of-department preparedness guidance and will strengthen this, on the basis of this report. Refer to response for Recommendation 1.*

Governance principles that support operational preparedness

2.32 During a crisis, decisions are made under pressured conditions and tight timeframes. An entity is more likely to be able to manage a crisis effectively if it has established appropriate governance processes for crisis response.⁶⁷ Key governance principles are:

- planning and managing by objectives⁶⁸;
- ensuring roles and responsibilities for crisis management are clear⁶⁹; and
- ensuring relevant information is documented and available to crisis responders.

Operational objectives

2.33 Each year Heads of Missions (HOMs) and Heads of Posts (HOPs) are required to 'certify' that posts are adequately prepared to meet objectives for crisis response. Posts identify risks and operational objectives for responding to crises in countries for which they are responsible in post

66 'A framework provides a way to break down emergency response into measurable units. Performance in one of the crisis response functions can affect the ability to perform in others'. See K Tindall and P't Hart, 'Evaluating government performance during consular emergencies: toward an analytical framework', *Policy and Society*, 30 (2), 2011, p. 143.

67 'It is crucial that functional governance structures...are in place between all parties. This allows for timely and effective management of a severe to catastrophic disaster'. See Department of Home Affairs, *Australian Disaster Preparedness Framework, A guideline to develop the capabilities required to manage severe to catastrophic disasters* [Internet], p. 16.

68 See Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning — Guidance* [Internet], Home Affairs, EMA, Canberra, 2021, p. 55, available from <https://www.homeaffairs.gov.au/emergency/files/casp-guidebook.pdf> [accessed 3 November 2021]. The National Incident Management System (NIMS) applied in the United States identifies characteristics of effective crisis management systems, including management by objectives and maintaining a manageable span of control. See United States Department of Homeland Security, *National Incident Management System* [Internet], 3rd edition, DHS, Washington, 2017, pp. 20–21, available from <https://www.hsdl.org/?abstract&id=804929> [accessed 3 November 2021].

69 'Throughout the management of any emergency response operation, coordinated choices are required, and the quality of crisis decision-making is likely to be highly correlated with the overall response effectiveness'. See K Tindall and P't Hart, 'Evaluating government performance during consular emergencies: toward an analytical framework', *Policy and Society*, 30 (2), 2011, p. 143.

Crisis Action Plans (CAPs). These plans set out general stages and actions for crisis response by the post.⁷⁰

2.34 Crisis management objectives established at individual post level may not sufficiently take into account constraints created by complex crises, such as pandemics or major disasters, where several posts may require additional support and resources from DFAT's Canberra office or other posts (see also paragraphs 2.22–2.29).

Defining objectives for scaled crisis response

2.35 The department identifies three categories of crisis. These describe in general terms the likely level of resourcing required for operational response (see Table 2.2 below).

Table 2.2: DFAT categories of crisis

Categories	Parameters
Events	Short periods of intense activities where DFAT's response can be managed within existing, business as usual (BAU) working arrangements at post and in Canberra-based divisions.
Incident	Require heightened activity at post or in a single division in Canberra, as well as 'limited but appropriate' support from DFAT's crisis response resources.
Crisis	Complex situations which have a significant impact on a single or multiple posts, multiple Canberra-based divisions, other agencies, and require the activation of DFAT's full crisis response resources.

Source: Information provided by DFAT.

2.36 DFAT's guidance outlining different categories of crisis could be further developed to include advice on setting objectives for responding to different levels of crisis. Response objectives developed at the time a crisis occurs could involve specifying priorities and operating limits, or the expected scale and speed of response. This would assist in the preparation of advice to government on options for response involving different levels of risk and cost.

2.37 Scaled categories of crisis provide reference points for building and maintaining preparedness.⁷¹ The justification for and allocation of resources to a response should be informed by policy priorities.⁷² There would be benefit in DFAT analysing and quantifying the resource demands of each level of crisis, with reference to:

- response objectives (determined by consular and crisis policy);
- the level of resourcing needed to achieve objectives for each category; and

70 CAPs are activated in line with the HOM/HOP's assessment of a crisis as being 'imminent, occurring or averted'. This triggers actions by post and Canberra-based areas appropriate for these stages.

71 The ability to scale a response to the dimensions of a crisis is a principle established by the Australasian Inter-services Incident Management System (AIIMS) which is based on the US system, NIMS. Fire and emergency services agencies in Australia which use AIIMS are required to have scalable processes for managing responses to incidents of varying type, scale, complexity and duration.

72 Managing an emergency and crises is ultimately about making difficult choices concerning the allocation of resources, expenditure, exposure to hazards or high levels of risk. By gaining agreement on the planned end state and definitions of success, influence, resources and capabilities are aligned to progress towards the desired end state. See Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning — Guidance* [Internet], pp. 26, 28.

- judgments about the level of uncertainty in response and tolerance for risk the government may accept.⁷³

2.38 There is no clear mechanism for determining when crisis response tasks have been fully achieved and a return to business as usual (BAU) is warranted. Categorising crises according to operational objectives, as well as the resources needed to achieve these, would provide clear triggers for the escalation of effort and for determining a return to BAU.

2.39 Processes for linking resource allocation to objectives for crisis response would enable DFAT to more accurately determine its funding requirements for responding to different types of crises. It may also allow DFAT to balance short-term forecasting of resource requirements with planning for longer-term investments in capability, including for complex crises (discussed at paragraph 2.96).⁷⁴

Role clarity in decision-making and span of control

2.40 As crisis response involves rapid decision-making, it is important that responders understand who holds authority for key decisions and the most effective channels for obtaining agreement to proposed actions.⁷⁵

2.41 The roles of key DFAT decision-makers involved in crisis response are not set out in a single document. The First Assistant Secretary of CCD (FAS CCD) acts as a key decision-maker in managing the government's operational response to a crisis. This role is executed in addition to the day-to-day responsibilities involved in managing a division. The role may be shared during crisis periods with a second senior officer at the same level. DFAT advised the ANAO that during the pandemic, DFAT appointed additional senior executives to share roles at FAS and Assistant Secretary level.

2.42 Emergency management frameworks generally separate the role of crisis response from BAU operations.⁷⁶ This is because the span of control for directing an operational response may become too wide for an individual leader to manage effectively. DFAT should consider alternative arrangements to mitigate this risk.

2.43 DFAT advised the ANAO that the role of FAS CCD is captured by the broad activities outlined in the division's business plan and in a checklist of actions used during a crisis. The checklist sets out

73 'The cost of completely mitigating consequences of catastrophic events is generally unacceptable'. Ibid., p. 42.

74 'No one knows when the next crisis will occur...Emergency managers must make decisions regarding current needs while maintaining flexibility to meet unknown future needs — factoring in recovery and resource variables'. Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning — Guidance* [Internet], p. 8.

75 'The capacity of employees to respond to a crisis is impacted by their understanding of their roles and responsibilities'. See International Organization for Standardization, 'Security and Resilience — Crisis Management — Guidelines for a Strategic Capability' (draft), p. 8. See also Australian Public Service Commission, *Managing crises and their consequences* [Internet], APSC, 2021, available from <https://legacy.apsc.gov.au/managing-crises-and-their-consequences> [accessed 18 November 2021].

76 For example, see United States Department of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response, 'The Incident Command Process', *Medical Surge Capacity Handbook* [Internet], Public Health Emergency, Washington D.C, 2007, paragraph 1.4.1, available from <https://www.phe.gov/Preparedness/planning/mscc/handbook/chapter1/Pages/theincidentcommand.aspx> [accessed 20 November 2021].

the responsibilities of FAS CCD during a crisis. Neither of these documents clearly explain the performance expectations of the role.⁷⁷

2.44 The heads of geographic and/or policy divisions do not have responsibility for crisis response beyond the management of foreign policy matters relating to the countries affected by a crisis. Posts report to these divisions. While HOMs/HOPs engage with CCD during a crisis, they are not accountable to FAS CCD for their post's performance in providing consular services and responding to crises. Roles or responsibilities for capability planning have not been defined at the departmental level.

Information management

Standard operating procedures

2.45 A crisis governance framework should provide standard operating procedures (SOPs) for all critical processes. These promote consistent decision-making at operational and tactical levels, and the controlled execution of response actions.⁷⁸ The ANAO assessed whether DFAT staff have access to appropriate guidance for responding to a crisis. Guidance should be up to date, complete and readily available to staff involved in crisis response.

2.46 Operational guidance relating to DFAT's crisis management functions is maintained on DFAT's intranet. The Crisis Gateway site provides information of varying detail for most functions.⁷⁹ Arrangements for the Global Watch Office (GWO) and information management are maintained in a separate location. It is important that staff (who may also be drawn from across the department or other entities) are able to quickly access relevant guidance to effectively carry out their duties.

2.47 Posts are required to save their Crisis Actions Plans (CAPs) to a repository to enable all participants in crisis response to quickly access them. As of October 2021, the 11 CAPs reviewed by the ANAO had been uploaded to the repository.

Recording decisions

2.48 During a crisis, governments may make decisions affecting large numbers of people. Commonwealth public servants are required under law to 'document significant decisions or actions consistent to a standard that will withstand independent scrutiny'.⁸⁰

77 The draft ISO standard for crisis management states that a person with appropriate authority should be appointed to be accountable for the development and implementation of the entity's crisis management capability, and for maintaining and managing this across the whole organisation. See International Organization for Standardization, 'Security and Resilience — Crisis Management — Guidelines for a Strategic Capability' (draft), p. 10.

78 'Standard operating procedures (SOPs) should govern operations and co-ordination and should include information sharing and communication protocols as well as scaling-up mechanisms to mobilise additional emergency response means'. See C Baubion, *OECD Working Papers on Public Governance, No. 23, OECD Risk Management: Strategic Crisis Management* [Internet], OECD Publishing, Paris, 2013, p. 9, available from <https://www.oecd-ilibrary.org/docserver/5k41rbd1l7r7-en.pdf?expires=1636163236&id=id&accname=guest&checksum=82ED7FC8996DDD15F29AA19E754431C1> [accessed 3 November 2021].

79 Detailed information was available for around half of the functions identified by the ANAO.

80 See Information National Archives of Australia, Management Standard for Australian Government [Internet], NAA, Canberra, 2021, available from <https://www.naa.gov.au/information-management/information-management-standards/information-management-standard-australian-government#purpose> [accessed 19 November 2021].

2.49 It is important that decisions and the basis of these, are retained as official records to maintain transparency and accountability and enable lessons to be learned.⁸¹ Government entities are also subject to certain obligations under freedom of information legislation to provide members of the public access to departmental records.⁸²

2.50 DFAT has regularly issued advice to its staff on how to manage records created in different formats, including through the use of social media channels.⁸³ DFAT guidance published in 2014 stated that Short Messaging Service (SMS), Instant messaging (IM), Twitter, voicemail exchanges and Facebook posts that support the business of DFAT are records. Guidance issued in 2018 detailed the responsibility of staff to keep a record of 'actions, events, conversations or other transactions where they provide evidence of formal advice, directions or significant decisions'. In May 2020, DFAT set out its record-keeping policy for the pandemic response.⁸⁴

2.51 Authoritative records relevant to crisis management have not been appropriately maintained by DFAT. These records relate to: advice to government; key crisis management decisions, approvals or the activation of crisis response mechanisms; and flight contracts, manifests and invoices.

2.52 Government entities use systems for managing departmental communications with ministers which also enable advice and approvals to be tracked.⁸⁵ DFAT advised the ANAO that advice to the Minister and information to ministerial staff in relation to the COVID-19 pandemic occurred via email, phone calls and WhatsApp. The use of these channels can make it difficult to identify decisions taken or authoritative approvals, if decisions and relevant details are not stored in the department's record-keeping system. The ANAO was only able to locate one record in DFAT's

81 Australian National Audit Office, *Audit Insights, Emergency Management — Insights from the Australian Government's COVID-19 Response* [Internet], ANAO, Canberra, 2021. See also Australian Public Service Commission, *Learning from Failure*, APSC, Canberra, 2015, p. 24, available from <https://legacy.apsc.gov.au/learning-failure-why-large-government-policy-initiatives-have-gone-so-badly-wrong-past-and-how> [accessed 20 October 2021].

In May 2020, the International Conference of Information Commissioners released a statement calling for three mandatory actions: 'Decisions must be documented; records and data should be secured and preserved in all sectors; and the security, preservation and access to digital content should be facilitated'. See Information and Privacy Commission, *COVID-19: The duty to document does not cease in a crisis, it becomes more essential* [Internet], IPC, Sydney, 2020, available from <https://www.ipc.nsw.gov.au/statements/covid-19-duty-document-does-not-cease-crisis-it-becomes-more-essential> [accessed 25 October 2021].

82 Paragraphs 11(1)(a) and (b) of the *Freedom of Information Act 1982* (Cth) state that every person has a legally enforceable right to obtain access to a document of an agency or an official document of a minister, other than an exempt document under the Act. Paragraph 4(1)(a)(v) defines a document as any article on which information has been stored or recorded, either mechanically or electronically.

83 Departmental advice issued to staff in 2022 describes social media as 'an umbrella term covering websites, technology, applications or tools that enable active and participatory publishing and interaction between individuals over the internet'.

84 The guidance states that 'employees, including contractors, consultants and Locally Engaged Staff (LES) are required to create and capture full and accurate records that track our decisions, actions taken and directions given which assisted us to respond to the pandemic'.

85 DFAT has access to the Australian Government's Parliamentary Document Management System (PDMS). Advice or requests for approval are provided in the form of ministerial briefs, submissions or correspondence.

document management system relating to the approval of the second evacuation flight from Wuhan.⁸⁶

2.53 Poor management of data and information creates risks for effective crisis management by affecting:

- available intelligence to support situational awareness;
- the quality of decision-making and advice on operational response actions;
- the ability to locate important and authoritative information quickly, when needed; and
- the ability to demonstrate due process in determining priorities and the allocation of resources during crisis response.

2.54 Emergency management entities often use logging systems to record key decisions and actions during complex incidents. These can support the establishment of clear instructional guidance and common systems for capturing operational decisions.

Is DFAT able to assure itself that it has adequate capability to respond to crises?

Departmental oversight and reporting of assurance activities is insufficient to provide assurance of crisis preparedness. Assurance activities undertaken by posts include the review of crisis plans and exercises and certifications of preparedness. These are not consistently implemented as intended. There is limited assurance over the preparedness of Canberra-based response functions and the crisis management system as a whole.

2.55 Assurance over crisis response capabilities provides confidence that operational arrangements can be activated rapidly and effectively when needed.⁸⁷

2.56 The ANAO examined whether DFAT's processes for gaining assurance over preparedness:

- align with high-level objectives and requirements and are conducted regularly⁸⁸; and
- establish clear points of accountability for the implementation of improvements.

Crisis response capability assurance — departmental-level assurance

2.57 The ANAO examined the preparedness of crisis response processes at the departmental level. Responsibility for scheduling, conducting and overseeing exercises for Canberra-based functions is not specified in DFAT policy guidance.

86 This record was a WhatsApp screenshot which had not been stored with a file note providing appropriate context in line with DFAT's records management policy. The ANAO was unable to locate a formal record of approval by the government for the second evacuation flight from Wuhan.

87 Assurance activities are 'designed to increase the confidence of government, the sector and the community in the ability of the system to plan for, respond to, and recover from emergencies'. See Inspector-General Emergency Management Victoria, *Assurance Framework for Management* [Internet], IGEM, Melbourne, 2019, p. 8, available from https://files.igem.vic.gov.au/2021-03/Assurance%20Framework%20for%20Emergency%20Management_0.pdf [accessed 1 December 2021].

88 'The subject matter focus and timing of organisational level assurance activities are usually determined by the organisation's management, leadership or governing board in line with requirements and needs'. Ibid., p. 16.

2.58 A learning from the Australian public service response to COVID-19 is that effective responses during crises can be assisted by the use of existing rules and liaison points and traditional chains of command.⁸⁹ A regime of testing and evaluation can provide information about the effectiveness of processes which are not performed as part of BAU activities.

2.59 While some processes are tested through BAU activity, several rely on specific testing and evaluation processes. Some individual units have been involved in exercises in recent years.⁹⁰ Without the involvement of critical support functions in post exercises, assurance over preparedness is incomplete. There would be value in DFAT establishing a forward exercise program that sets out how often and when departmental-level crisis functions should be exercised and include crisis response processes at post. Post preparedness activities are discussed further at paragraphs 2.71 to 2.95.

Consular and crisis management training

2.60 An entity's preparedness and capability rely on people with 'appropriate skill and knowledge and skills with a focus on leadership skills, technical skills and a culture of working as one'.⁹¹ The ANAO examined whether DFAT conducts suitable training to build and maintain its crisis management capabilities.

Upskilling of the consular workforce

2.61 In May 2020, CCD identified lessons from its experience in returning Australians from overseas. The lessons learned report observed that the COVID-19 crisis had:

...highlighted a need to build and retain crisis and consular capacity across the department, with these skills recognised as essential elements of a DFAT career and training compulsory for all DFAT officers.

2.62 Addressing this requirement was endorsed by the responsible Deputy Secretary in August 2020, and a proposal to expand consular and crisis training was approved by the division head in January 2021.

2.63 Staff deployed overseas are required to complete basic consular and crisis management training before each posting. A total of 349 staff completed consular training in 2021, an increase of 89 per cent from 2020. A total of 307 staff completed crisis management training in 2021, an

89 'Agencies can increase their expertise by planning in advance. Agencies should work together in an everyday business environment to continue to learn about crisis management, (and) test their internal arrangements...'. Australian Public Service Commission, *Managing crises and their consequences* [Internet]. The 2017 version of AGCMF in place at the start of the pandemic stated that any special purpose/temporary mechanisms should be guided by existing arrangements. An entity may adjust processes over the course of the crisis response in line with evolving circumstances. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 2.2, p. 26.

WHO guidance on preparedness planning states that 'pandemic planning should aim to strengthen existing systems rather than developing new ones', and 'lines of command and control are based on existing structures and mechanisms'. See World Health Organization, *Guide to revision of national pandemic influenza preparedness plans, Lessons learned from the 2009 A(H1N1) pandemic* [Internet], pp. 2, 8.

90 DFAT advised the ANAO that DFAT piloted two 'live testing exercises' between the Global Watch Office (GWO), the Canberra-based crisis centre, and Singapore and Noumea posts in 2019. Kabul and Baghdad posts and the GWO conducted live testing exercises in January 2021. Planned exercises with Seoul and Tehran posts were postponed.

91 Department of Home Affairs, *Australian Disaster Preparedness Framework, A guideline to develop the capabilities required to manage severe to catastrophic disasters* [Internet], p. 8.

increase of 13 per cent from 2020. Compliance rates for the completion of mandatory crisis management training for staff who were due to be deployed were 95 per cent in 2020 and 99 per cent in 2021.⁹²

2.64 DFAT does not monitor or report on conformance with mandatory consular and crisis management training requirements beyond training required for deployment overseas. There is no consolidated reporting on training for non-deployed staff. There would be benefit in DFAT regularly reporting to FAS CCD on the status of training for its Canberra office and for staff during posting.⁹³ Reporting should also include the delivery of training to Locally Engaged Staff at post, as these staff comprise the largest group of overseas staff and are often integrally involved in post responses to crises.

Training content

2.65 It is unclear whether DFAT's crisis management training is fit-for-purpose because DFAT has not specified the competencies expected of its workforce.

2.66 Consular and crisis management capabilities fall under the broad category of 'service delivery' within DFAT's enterprise-wide capability framework. This could provide a starting point for developing a more detailed framework setting out competencies required for crisis management.⁹⁴ Competencies provide a reference point for developing crisis management training programs, assessing capability and identifying and remediating gaps.

Identification and implementation of lessons learned

2.67 In May 2020, CCD conducted a lessons learned workshop to reflect on activities to evacuate Australians via flights and from cruise ships, as part of its effort to return overseas Australians. The workshop involved divisional staff and drew on lessons captured at posts and by the legal, finance and communications business areas. The workshop's report made 55 recommendations aimed at improving:

- the management of requests from the Minister's office, including for data on overseas citizens;
- public information and processes for returning Australians and providing financial assistance;
- engagement with other parts of the department, other entities and partner countries; and

92 Information about staff training is not located in a single human resource system, and there is no consolidated report produced on completed training. Compliance figures were calculated by extracting data from different sources. The 2017 ANAO audit of the effectiveness of DFAT measures to strengthen the protection of Australia's posts and staff overseas observed that DFAT's human resource system could not produce informative reporting on staff attendance at security training courses, such as the number of attendees for courses, details of where the attendees were being posted, courses completed and dates of completion. It recommended DFAT develop appropriate mechanisms to gain assurance that staff receive required training. See Auditor-General Report No. 5 2017–18 *Protecting Australia's Missions and Staff Overseas: Follow-on*, paragraphs 3.23–3.25 and Recommendation no. 3. This audit found that DFAT has not addressed limitations in providing assurance over training.

93 The number of staff at posts who work on consular issues is significantly larger than those who are formally charged with this responsibility as part of their job title. All staff at posts are expected to assist with consular duties during a crisis.

94 DFAT advised the ANAO that competency requirements for specific consular and crisis management roles are set out in role descriptions used for advertising positions, as part of recruitment processes.

- improving skills in consular and crisis management across the department.

2.68 In August 2020, DFAT developed an initial implementation plan which assigned responsibility for each of the recommendations. It did not prioritise recommendations or formally monitor their implementation. DFAT advised that updating the document was overtaken by events, with lessons learned incorporated into the division's crisis response processes.⁹⁵

2.69 In October 2020, DFAT provided posts with a lessons learned template and recommendations tracker. This was to help posts reflect on responses to COVID-19 or other crises and provide feedback on CCD policies and training. Post participation was not mandatory and only five posts responded.

2.70 DFAT's Internal Audit has not reviewed any crisis management function, apart from its evaluation of crisis preparedness planning at post in July 2017. DFAT should establish assurance processes which incorporate a regular review of all critical components of its crisis management function. This would enable resources to be targeted to areas of vulnerability.

Crisis response capability assurance — post-level assurance

2.71 As posts are responsible for on-the-ground crisis management, they need to be ready to provide consular services and support to overseas Australians when a crisis occurs.

Crisis Action Plans

2.72 Crisis Action Plans (CAP) support post crisis preparedness and help to guide responses during a crisis event. They can save time by pre-assigning some tasks, pre-collecting information and serving as a reference source.⁹⁶ CAPs are required to be regularly updated, with accountability for ensuring they are fit-for-purpose resting with the HOM or HOP.⁹⁷

2.73 The ANAO examined whether CAPs were treated as 'live documents' during pandemic conditions. At the beginning of the pandemic in January 2020, the 11 CAPs examined by the ANAO were up to date.⁹⁸ As the pandemic progressed, CAPs lapsed for three of these posts.⁹⁹

2.74 When a mission closes or its working arrangements and capacities change, a CAP should be updated to reflect these circumstances. The embassy in Kabul last issued a CAP in December 2020. After the closure of the embassy in May 2021, embassy staff working remotely did not update the

95 A large number of recommendations can be problematic, particularly when an organisation has a limited capacity to implement them. Realistic action plans should therefore prioritise lessons. See Australian Institute for Disaster Resilience, 'Lessons Management' [Internet], *Australian Disaster Resilience Handbook Collection*, 2nd edition, AIDR, Melbourne, 2019, p. 34, available from https://www.aidr.org.au/media/1760/aidr_handbookcollection_lessonsmanagement_2019.pdf [accessed 1 December 2021].

96 Institute for Public Relations, *Crisis management and communications* [Internet], IPR, Gainesville, 2007, available from <https://instituteforpr.org/crisis-management-and-communications/> [accessed 18 November 2021].

97 Heads of Mission are responsible for embassies, high commissions and permanent missions. Heads of Post are responsible for consulates-general and consulates.

98 Nine of these had been reviewed in the year before the pandemic.

99 This is the time that has elapsed between the issuing of a new CAP and the expiry of the previous CAP. The posts with lapsed CAPs were London (six months), New Delhi (eight months) and Port Moresby (one month).

Kabul post CAP until November 2021.¹⁰⁰ At March 2022, all posts reviewed by the ANAO have updated CAPs in place.

Annual certifications

2.75 HOMs/HOPs are required to sign certifications before 31 January each year providing assurance on their post's preparedness. Certifications are required to include a summary of CAP exercises conducted throughout the year and lessons learned. At the end of 2020, CCD advised HOMs they could certify that the requirement for annual exercising of the CAP had been met if they had activated their CAP and identified lessons learned from their response to the pandemic. CAPs are expected to be 'live documents' and updated, including emerging risks as required.

2.76 The ANAO identified that only 51 posts (44 per cent) submitted certifications by the due date. A total of 27 posts (53 per cent of posts with overdue documentation) submitted their certification between two and three months late. DFAT was unable to locate certifications for 14 posts (12 per cent).¹⁰¹

2.77 As at March 2022, 79 per cent of certifications for 2021 were appropriately stored in DFAT's Electronic Document Record Management System. Three per cent were not filed in the correct location in the system and 18 per cent were missing. There is no regular reporting to the head of the division on the content or completeness of certifications.

CAP reviews

2.78 Posts are required to conduct full reviews of CAPs every two years.¹⁰² This review activity is intended to provide assurance that a CAP 'remains current and appropriate to identified risks'.

2.79 The certification process does not require the HOM/HOP to report that a post has completed the biennial CAP review, and CCD does not regularly monitor timeliness in fulfilling this requirement.¹⁰³ During the COVID-19 pandemic, CCD did not advise posts due to conduct their two-year full CAP review how this should be managed. In September 2021, CCD undertook a stocktake of CAP records. It identified that 40 per cent of CAPs, representing 41 per cent of posts, had not been reviewed in two years. Seven per cent of CAPs were missing from the repository. As at May 2022, all CAPs were available.

Reporting on assurance requirements

2.80 Since 2019–20, DFAT's Corporate Plan has included the annual performance measure: '100 per cent of crisis action plans reviewed and exercised annually for countries of resident

100 Responsibility for Kabul embassy functions were initially transferred to DFAT's Canberra office in May 2021. The interim mission for Afghanistan was announced by the government in September 2021 and is co-located with the Australian Embassy in Doha, Qatar.

101 DFAT was unable to locate 2021 certifications for Brasilia, Brussels, Cairo, Colombo, Copenhagen, Funafuti, Kabul, Koror, Lae, Lima, Moscow, Mumbai, Ramallah and Sao Paulo posts.

102 CAPs are required to be updated, as necessary, to reflect new or emerging risks. Some posts have revised their CAP more regularly than every two years, including Beijing and Beirut posts.

103 DFAT advised the ANAO that the certification template is being revised to make clear requirements for reporting on compliance (see also Appendix 2 of this report).

accreditation'.¹⁰⁴ The 2019–20 and 2020–21 annual reports stated that this measure was 'on track' to being achieved.¹⁰⁵

2.81 Commonwealth entities report on their performance against legislated requirements.¹⁰⁶ There should be a clear link between an entity's performance measure and the key activities it has undertaken as part of its purpose.¹⁰⁷ DFAT's performance measure is a proxy for assessing preparedness and relates to DFAT's purpose and activities.¹⁰⁸ While it specifies a target¹⁰⁹, it is not a feasible measure in practice because CAPs are not required to be fully reviewed and exercised each year. It is unclear what is being measured.

2.82 When reporting against performance measures, entities are required to use sources of information which are reliable and verifiable and provide a basis for assessing performance over time. DFAT's explanation of evidence used to measure performance does not reference CAPs or HOM/HOP certifications, and there is no indication of how it has determined that it is 'on track'.¹¹⁰

2.83 DFAT should review the measure in its Corporate Plan to ensure it provides a clear view to the Parliament on the nature and extent of assurance provided through its reporting. This should include clarifying its methodology for determining progress against the measure and identifying the data which has informed its assessment.

2.84 In 2017, an Internal Audit report on crisis response planning found that there was no formal mechanism for reporting to senior management on the quality and testing of CAPs, and post conformance with reporting requirements. CCD management agreed that quarterly reports would

104 Department of Foreign Affairs and Trade, *Corporate Plan 2019–20* [Internet], DFAT, Canberra, 2020, p. 22, available from <https://www.dfat.gov.au/sites/default/files/corporate-plan-2019-20.pdf> [accessed 22 March 2022]; Department of Foreign Affairs and Trade, *Corporate Plan 2020–21* [Internet], p. 27, and Department of Foreign Affairs and Trade, *Corporate Plan 2021–22* [Internet], p. 25.

105 DFAT uses three ratings to assess its performance against performance measures ('Not Achieved', 'On track' and 'Achieved'). A rating of 'On track' indicates that it has not fully achieved the intended result. See Department of Foreign Affairs and Trade, *Annual Report 2019–20* [Internet], p. 94; and Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], p. 9.

106 Minimum requirements are set out under rules 16E (2) and 16EA of the *Public Governance, Performance and Accountability Rule 2014* (the PGPA Rule) [Internet], available from <https://www.legislation.gov.au/Details/F2022C00021> [accessed 22 March 2022]. See subsections 16EA (a) to (f) for the required characteristics of performance measures. Section 16EA(a) states that a performance measure should relate directly to one or more of the entity's purposes or key activities. Also, rule 16F (1).

107 Department of Finance, *Developing good performance information (Resource Management Guide 131)* [Internet], Finance, Canberra, 2022, paragraphs 15–17, available from https://www.finance.gov.au/sites/default/files/2020-05/RMG%20131%20-%20Developing%20good%20performance%20information_0.pdf [accessed 14 March 2022]. 'The development of performance measures should begin with consideration of the objectives (or purposes) that the entity seeks to achieve' (paragraph 15); 'Purposes are the strategic objectives that an entity intends to pursue over a reporting period...Activities are distinct efforts undertaken to achieve a specific result' (paragraph 16); and 'Activities should be aligned with the entity's purposes' (paragraph 17). DFAT advised the ANAO that it is currently reviewing measures, targets, methodologies and data sources used for reporting on its performance, including through its annual report (see also Appendix 2 of this report).

108 As the measure relates to planning for crises, it does not assess actual or demonstrated preparedness.

109 This a requirement detailed at sub-rule 16E(5)(b) of the PGPA Rule which requires the entity's purposes to be measured and assessed through specified targets where this practicable.

110 'Our assessment is based on lessons learnt...exercises and training programs, case studies, and internal and external feedback. It is also informed by analysis of data in our registration and IT systems used during COVID-19 to track flights, cruise ships and Australians registered overseas', Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], p. 94.

be provided to FAS CCD and DFAT's executive committee as part of regular updates on consular matters. This recommendation was not implemented.

Pandemic planning at post

2.85 The template's risk register prompts posts to assign a risk rating for 'pandemic/health crisis'. DFAT advised the ANAO that Low risks do not need to be included in the CAP risk register. Very High and High risks must be managed through specific planning.¹¹¹ The template does not require posts to complete a pandemic plan.¹¹² Before the onset of the pandemic in January 2020, four of 11 posts examined by the ANAO identified a 'pandemic/health crisis' as a High risk. One post had a pandemic plan in place.¹¹³

2.86 In February 2020, DFAT advised all posts to develop a plan for maintaining service delivery and staff welfare under pandemic conditions using a COVID-19 plan template. Use of the template was optional and to be 'adapted locally as required'. Posts were asked to assess local conditions and the possibility of a large number of Australians contracting the virus, being quarantined locally or requiring assistance to leave the affected areas or countries.¹¹⁴

2.87 As at March 2022, seven of the 11 posts examined by the ANAO had identified a 'pandemic/health crisis' as a High risk. Of these posts, New Delhi and Washington posts did not have pandemic plans or COVID-19 plans in place.

2.88 DFAT should update the CAP template to include a requirement for pandemic planning. This would support consistency in pandemic planning across the overseas network and provide assurance over a post's readiness to respond to health crises.

2.89 DFAT should clarify its policy for gaining assurance over post preparedness, including the role of its various assurance tools and mechanisms and ensure greater rigour in the implementation of these. This would strengthen the basis of its reporting to the Parliament.

Post review processes

2.90 Overseas missions undergo Post Business Reviews (PBRs) every 18 months which are intended to provide assurance to the Secretary of DFAT on the performance of post in carrying out key business functions. The review process canvases the views of stakeholder divisions, including CCD, and external entities.¹¹⁵ Input provided by CCD does not address performance against set objectives or conformance with requirements.¹¹⁶ DFAT advised the ANAO that PBRs would only be

111 Pretoria and Washington posts did not include 'pandemic/health crisis' in their CAP risk registers before November 2021. As at March 2022, Tehran post had not included this risk in its CAP risk register.

112 DFAT's CAP template was last updated in July 2018. The previous iteration of the template included a pandemic plan.

113 Beijing post updated its residual risk rating for 'pandemic/health crisis' from Medium to High in its June 2021 CAP. Washington post updated its risk register to include 'pandemic/health crisis' in its November 2021 CAP, with this risk rated as High.

114 Most plans reviewed by the ANAO addressed measures to protect staff, local pandemic conditions, and the preparedness of the local health system.

115 These are typically the departments of Home Affairs (including the Australian Federal Police) and Defence, and the Office of National Intelligence.

116 The ANAO reviewed CCD input to seven PBRs between 2019 and 2020.

used to address serious matters of concern, with lesser issues discussed between CCD, the geographic area responsible for the post and the Head of Mission.

Post exercises

2.91 Exercising is aimed at testing operational capabilities and enables an entity to identify strengths and weaknesses in its preparedness to respond to a crisis. Posts are expected to exercise specific CAP crisis response mechanisms regularly. These may include: standing up the post's crisis response coordination committee; testing roles and responsibilities; and updating emergency contact details and procedures.

2.92 The ANAO identified that nine of 11 posts had exercised their CAPs in the year before the COVID-19 pandemic.¹¹⁷ As at March 2022, all 11 posts reviewed by the ANAO had exercised their CAPs in the last 12 months, with exercise information included in their annual certification.

2.93 DFAT uses Crisis Preparedness Assurance Team (CPAT) visits to posts to obtain an up to date understanding of post risks and capacity to respond to these.¹¹⁸ Before the COVID-19 pandemic, visits were conducted to three to five of approximately 120 posts each year, selected annually. In March 2022, DFAT developed a forward CPAT exercise program with the Department of Defence for the period 2022 to 2025. The forward program is informed by risk to ensure posts with the greatest need are supported within an acceptable period of time.¹¹⁹

Lessons learned at post

2.94 Following a response to a crisis, posts are expected to undertake a lessons learned exercise to identify strengths and weaknesses of the response. Posts regularly review responses to individual crisis events and exercises to improve operations and planning for future events.

2.95 Lessons learned information from CAP activations and exercises is to be included in HOM/HOP certifications. Of 11 posts reviewed by the ANAO, five provided lessons learned documentation for 2019 and 2020. This increased to eight of the 11 posts in 2022. Lessons learned are not consolidated to identify common crisis management issues across posts.

Assurance provided through capability planning

2.96 Planning for preparedness should involve processes for identifying requirements for infrastructure, ICT, workforce, and training and exercising and for allocating resources to priorities. Formal planning processes also provide a basis for determining whether sufficient capability or gaps exist. A crisis management framework and the use of risk processes in planning can assist in identifying performance expectations and determining generic capabilities suitable for a range of

117 In 2019, Exercise information for the preceding year is to be included in annual HOM/HOP certifications. Exercise information for seven of 11 posts was included in the certifications for 2020. DFAT does not have records indicating exercises were conducted by London post.

118 This team generally consists of two Australian Defence Force personnel, two CCD officers and an officer from DFAT's Humanitarian Response, Risk and Recovery Branch. An Australian Federal Police officer may also participate.

119 The March 2022 CPAT program states that the overall risk rating reflects the likelihood and impact of a crisis occurring in a country and the relevant post's ability to respond. Factors taken into consideration are DFAT's assessment of the post and its susceptibility to crises, the time since the last CPAT, the current Smartraveller security rating and any upcoming major events set to occur in the country.

crisis situations (see paragraphs 2.13–2.18 on crisis management functions and paragraphs 2.24–2.27 on risk processes).¹²⁰

2.97 Capability development processes should stipulate how the entity will provide the Executive and government with assurance over levels of readiness and capacity for sustainment in crisis response. As discussed at paragraphs 2.22 to 2.29, DFAT does not specify and report internally on expectations of performance in crisis situations. Without standard metrics for preparedness¹²¹, DFAT lacks an understanding of the level of investment needed to accomplish the tasks directed by government.¹²²

2.98 The ANAO identified examples of countries which have established standard indicators of performance.¹²³ The United Kingdom has established a whole-of-government capabilities program that identifies critical capability risks defined by 22 work streams. The United States has identified 32 capability targets in a statement called the National Preparedness Goal.

2.99 There would be value in DFAT strengthening its engagement with partner countries on preparedness policies and processes and to consider formal approaches taken by other countries to testing and reporting on preparedness, using standard performance metrics. In adopting a formal approach to capability assurance, there may be scope for DFAT to compare or benchmark its capabilities against other countries.

Does DFAT have suitable processes for managing risks associated with large-scale consular and crisis operations?

DFAT's enterprise-level risk processes identify key consular and crisis management risks. There is a need for greater testing of controls to ensure mitigations are effective in reducing the department's exposure to risk. Processes for identifying and documenting post-level controls require strengthening. DFAT does not systematically identify and treat crisis-related risks and vulnerabilities which may affect its global network of posts.

2.100 Under the *Public Governance, Performance and Accountability Act 2013*, the accountable authority is responsible for ensuring appropriate systems of risk oversight, management and

120 Guidance issued by the United Kingdom Cabinet Office advises entities to prepare plans that are flexible enough both to address known risks and to provide a starting point for handling unforeseen events. See United Kingdom National Audit Office, *The government's preparedness for the COVID-19 pandemic: lessons for government on risk management* [Internet], p. 4.

121 See paragraph 2.23.

122 WHO guidance states that 'funding should be aligned with costed, prioritised preparedness measures based on risk and capacity assessments'. World Health Organization, *A Strategic Framework for Emergency Preparedness* [Internet], WHO, Geneva, 2017, p. 3, available from <https://apps.who.int/iris/bitstream/handle/10665/254883/9789241511827-eng.pdf;jsessionid=0D2F287F83EA4EC233FCD4879B6CF41A?sequence=1> [accessed 1 December 2021].

123 The ANAO did not assess whether these frameworks accord with better practice.

internal control are established and maintained.¹²⁴ Risk is defined as ‘the possibility of an event or activity preventing an organisation from achieving its outcomes or objectives’.¹²⁵

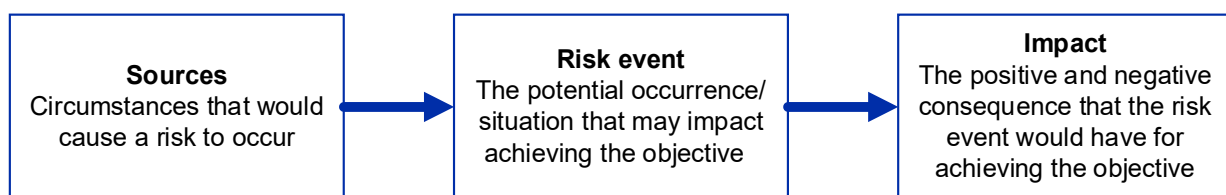
2.101 The ANAO examined whether, before and during the COVID-19 pandemic, DFAT had appropriate risk management policies and processes to support it to effectively identify and manage consular and crisis risks.

Enterprise level policy and processes

Identifying risks

2.102 DFAT’s Risk Management Guide sets out its risk policy and processes for identifying and managing the department’s strategic and operational risks. The guide outlines how a risk to the achievement of an organisational objective can be identified (see Figure 2.1). Risks may arise from: a lack of capability; an adverse operating environment; differing stakeholder interests and/or legal, regulatory and policy requirements.

Figure 2.1: DFAT guidance on identifying strategic and operational risks



Source: DFAT Risk Management Guide.

2.103 Commonwealth entities are required to maintain an enterprise-level risk register to support the achievement of their plans and objectives.¹²⁶ DFAT’s Enterprise Risk Register (ERR) is intended to capture its strategic and operational risks and provide a mechanism for managing these.

2.104 DFAT’s Risk Management Guide describes in broad terms its appetite for operational risks.¹²⁷ For service delivery functions (consular services and passports), DFAT aims to ‘mitigate as much as practicable, risk that would disrupt the delivery of critical services’. The ERR states that DFAT’s priority is to deliver services in the areas of public communications, crisis response and specific consular cases. It also indicates DFAT’s appetite to accept risk in the delivery of other consular services, noting that ‘it may not always fully meet government and public expectations’.

2.105 In addition to its broad statement of risk appetite, DFAT should also determine risk tolerances for specific consular and crisis management activities and a means of determining

124 Section 16, *Public Governance, Performance and Accountability Act 2013* (Cth). The accountable authority of DFAT is the Secretary.

125 Department of Finance, *Implementing the Commonwealth Risk Management Policy — Guidance* [Internet], Finance, Canberra, 2016, p. 5, available from <https://www.finance.gov.au/sites/default/files/2019-11/implementing-the-rm-policy.pdf> [accessed 21 March 2022].

126 Department of Finance, *Commonwealth Risk Management Policy* [Internet], Finance, Canberra, 2014, p. 12, available from https://www.finance.gov.au/sites/default/files/2019-11/commonwealth-risk-management-policy_0.pdf [accessed 9 November 2021].

127 DFAT’s Risk Management Guide defines risk appetite as the amount of risk that DFAT is willing to accept or retain to achieve its objectives. Risk tolerance defines the amount of risk-taking that is acceptable to DFAT in relation to specific categories and subcategories of risk. Where a risk exceeds DFAT’s level of tolerance, staff are expected to take further steps to reduce DFAT’s exposure to the risk.

whether it is operating within tolerances.¹²⁸ This would allow it to determine its actual level of exposure to risk, and what specific trade-offs it is prepared to make in the delivery of services when resources are constrained.¹²⁹

2.106 In September 2020, DFAT's Executive considered risks to its operations posed by COVID-19 and agreed that 'consular capability' should be considered a core function of the department. The ERR was subsequently revised in November 2020 to recognise that an inability to 'deliver consular services (including responding to international crises) in line with government and public expectations' would pose a risk to achievement of corporate objectives.¹³⁰

2.107 The ERR's consular and crisis risk description indicates key sources of risk and their impacts on DFAT's ability to meet corporate objectives. DFAT rated the operational risk of not being able to meet consular and crisis management objectives in November 2020 as Medium on a scale of Low to Very High. The risk was assessed as already having been partially realised.

2.108 In February 2021, the rating was increased to High, as it was considered that the risk had been underrated. In October 2021, the Executive considered the implications for DFAT of the planned re-opening of international borders on 1 November 2021, with risks subsequently reflected in the ERR for December 2021.

Managing risks through controls

2.109 The November 2020 ERR identified 18 controls to mitigate the impact of the global pandemic on consular operations and the achievement of crisis management objectives. Of these, half were rated as 'partially effective', with the risk owner noting that additional funding would be needed for many of the mitigations.

2.110 The ERR does not identify the specific risks which contribute to the broadly stated risk of being unable to deliver services against expectations. Controls are therefore not linked to specific risks, potentially reducing DFAT's ability to judge whether mitigations are effective. Controls are not tested and residual risk ratings are not supported by data or analysis.¹³¹

2.111 The February 2021 ERR update observed that DFAT's approach to risk management was highly reliant on 'human controls', that is, those based on the skills and judgment of staff over technical controls, such as automated systems. It also stated that reduced availability of staff contributed to 'control ineffectiveness'. While the ERR identified a need to 'remediate the balance',

128 See Department of Finance, *Defining Risk Appetite and Tolerance, Comcover Information Sheet* [Internet], Finance, Canberra, 2016, p. 2, available from <https://www.finance.gov.au/sites/default/files/2019-11/comcover-information-sheet-defining-risk-appetite-and-tolerance.pdf> [accessed 23 February 2022]. This document states that while risk appetite usually involves qualitative statements, risk tolerance operationalises the statements by using quantitative measures to enable monitoring and review.

129 Articulating risk appetite and tolerances increases transparency in decision-making by making clear which trade-offs are being made in an emergency. See United Kingdom National Audit Office, *Initial learning from the government's response to the COVID-19 pandemic* [Internet], UKNAO, London, 2021, pp. 13, 17, available from <https://www.nao.org.uk/report/initial-learning-from-the-governments-response-to-the-covid-19-pandemic/> [accessed 24 November 2021].

130 The ERR is reviewed three times a year (nominally, in February, June and November). Responsibility for managing this risk was assigned to the deputy secretary responsible for consular services.

131 Examples of controls cited in the ERR which could be measured relate to: the efficiency and stability of ITC systems; rate of staff turn-over; and levels of training and exercising.

it concluded this was subject to funding for ICT improvements. Controls which are contingent on future funding commitments cannot be considered effective.

2.112 CCD risk assessments have concluded that ‘the present situation continues to provide an unacceptable level of risk that requires on-going mitigations to reduce the risk’.¹³² The June and November 2021 ERRs did not substantively alter risk ratings for meeting consular and crisis objectives, indicating controls remained partially effective.¹³³

2.113 In June 2020, the Secretary of DFAT directed all divisions to develop four-year business plans and risk registers (2021–25) by January 2021. A key aim of the planning process was to achieve ‘clarity of purpose, manage risk and align resources to [the] highest priorities’. The division finalised its business plan and risk register in December 2021.¹³⁴

COVID-19 Management Enterprise Risk Register

2.114 On 31 March 2020, DFAT established a risk register, separate to the ERR, to specifically address the impacts of the pandemic on DFAT’s business operations.¹³⁵ The COVID-19 Management Enterprise Risk Register (CRR) identified a risk that ‘Australians overseas receive ineffective consular assistance’. CCD produced a risk management plan in May 2020 identifying external and internal risks.¹³⁶ The plan was not updated beyond June 2020.

2.115 Some consular-related risks were incorporated into activity-specific risk registers, including for activities relating to the return of overseas Australians, such as the facilitated commercial flights and financial assistance programs.

2.116 The CRR identified a risk that ‘intense and continuous operational pressures could result in failure to develop longer-term crisis management strategies’. The primary mitigation for this risk was to ‘retain sufficient capability and resources for BAU and the development of longer-term strategies’. Actions aimed at addressing this risk were considered to be ‘on-going’. Without clear implementation planning, including check points for assessing progress in implementation, the efficacy of controls cannot be tested.

Management of risks at post

Identification of risks

2.117 Responsibility for crisis preparedness and response at post is devolved to HOMs/HOPs. The post Crisis Action Plan includes a template for identifying categories of risk most relevant to the countries for which the post is responsible (for example, political or military hostilities, disasters, health and kidnapping). In line with an ‘all hazards’ approach to risk management, some posts examined by the ANAO identified ‘pandemic/health crisis’ as a risk requiring treatment (see paragraphs 2.85 and 2.87).

132 The ERR for December 2021 maintained this assessment.

133 Staff welfare, rated as ‘off track’ in June 2021, was rated as ‘on track’ in December 2021. All other ratings remained the same.

134 Until December 2021, the division relied on a business plan finalised in April 2019.

135 In November 2020, the Executive decided to integrate key elements of the CRR into the department’s Enterprise Risk Register.

136 Of nine sources of risk, four related to staffing constraints and four were due to the reduced availability of flights and potential weaknesses in consular business processes.

Controls

2.118 While a CAP's risk register captures residual risks, the template does not require controls to be identified. Control mechanisms may be captured in annexes with evacuation, pandemic or natural disaster plans. It is unclear how residual risk ratings are determined without controls having been identified.

2.119 Specific planning for High or Very High risks does not occur consistently.¹³⁷ The efficacy of some controls is tested as part of CAP exercises (for example, site evacuations, alternative sources of power, emergency communications equipment). CAPs do not specify which controls should be tested and who is responsible for this.¹³⁸

2.120 CAP guidance and templates were last updated in July 2018 and have not been reviewed to align with DFAT's Risk Management Guide, issued in 2020. Adopting the risk assessment template and processes established at enterprise level would enable clearer links to be made between risks and controls.

COVID-19 Posts Risk Dashboard

2.121 Before the pandemic, DFAT did not have a framework or processes for generating a high-level overview of posts assessed as being at High risk of experiencing a crisis, or of not being able to respond effectively should a crisis occur.

2.122 In May 2020, DFAT established a COVID-19 Posts Risk Dashboard (the dashboard) to enable daily reporting to the Secretary on risks associated with post operations and capacity. The dashboard provided a global and regional overview of risks covering: staff welfare; security of people and assets; and the ability of posts to continue operations and deliver services. The level of risk affecting each post was determined using a weighted average of eight risk indicators. Risk ratings for each indicator were informed by sub-indicators using qualitative and quantitative information. The content of the dashboard is shown in Appendix 6.

2.123 The dashboard was intended to replace largely unstructured and unassessed information provided to the Executive daily. It aimed to streamline data collection and improve the quality and consistency of reporting. DFAT advised the ANAO that divisions and posts were not equipped to efficiently provide the data needed to maintain the dashboard. It was discontinued in February 2021.

Management of network risks

2.124 The CAP template appropriately links business continuity and crisis planning, helping to ensure a post considers all factors that may impact on crisis response. DFAT does not have regular formal processes for identifying risks potentially affecting multiple posts and which may require mitigation at departmental level (for example, risks relating to ICT access or the deployment of staff).

2.125 In March 2020, DFAT established the (COVID-19) Global Operations Sub-Committee to undertake operational planning in relation to staff welfare and the delivery of critical consular and

¹³⁷ While New Delhi and Washington posts rate 'pandemic/health crisis' as a High risk, neither posts have pandemic plans in their CAPs or COVID-19 Plan annexes in place, as of March 2022.

¹³⁸ General roles and responsibilities are outlined in other sections of the CAP.

passport services. Its terms of reference describe the overseas network as ‘a high-level asset’ and the committee’s role as providing assurance over ‘the management of risks and issues relating to the performance and operation of the overseas network’. The committee supported the Enterprise Business Continuity Taskforce by addressing risks and issues primarily affecting posts until the end of 2020.¹³⁹

2.126 The sub-committee no longer exists. DFAT advised the ANAO that matters included in its remit are now addressed by its Operations Committee. While the terms of reference for this committee refer to the effective functioning of the department, they do not explicitly address the overseas network.

139 The sub-committee reported to DFAT’s Executive Operations Committee and met on a weekly basis until 22 April 2020 (six meetings). In 28 April 2020, the Global Operations Sub-Committee commenced combined meetings with the Enterprise Business Continuity Taskforce for the remainder of 2020 (17 meetings).

3. Crisis response

Areas examined

This chapter examines the effectiveness of DFAT's crisis management arrangements in responding to the COVID-19 crisis to return overseas Australians and its achievement of the government's objectives.

Conclusion

DFAT applied its crisis management arrangements to support the return of Australians and adapted these to deliver a new program of flights and financial assistance. The pandemic has highlighted weaknesses in responding to standard and complex, and large-scale crises. While policy advice to the government was largely appropriate, DFAT's reporting to government on its return of Australians could not be verified by the ANAO.

Areas for improvement

The ANAO made seven recommendations relating to: the management of data and information; workforce planning; emergency procurements; the registration of clients; and assistance to vulnerable clients.

3.1 Crisis response actions are those taken in anticipation of, during, or immediately after a crisis to ensure its impacts are minimised, and those affected are supported as quickly as possible.¹⁴⁰ The ANAO examined the effectiveness of DFAT's advice to the government on responding to the COVID-19 pandemic and its use of crisis management and standard business processes to return overseas Australians.

3.2 DFAT's response actions were reviewed with reference to the crisis management functions outlined in Table 1.1 of this report:

- The function of early warning and intelligence was examined by reviewing the quality of advice provided by DFAT to government throughout the pandemic and the effectiveness of its operational arrangements for managing information.
- DFAT's ability to establish direction and coordinate the government's response to the pandemic was reviewed in the context of early evacuations from Wuhan and its mobilisation of staff to support the department's response activities.
- The ANAO also examined the effectiveness of DFAT's engagement with the public through its communications campaigns, call centre functions and management of correspondence, including complaints.

140 Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], PM&C, Canberra, 2021, p. 12, available from <https://www.pmc.gov.au/sites/default/files/publications/aus-gov-crisis-management-framework-v3-1-2.pdf> [accessed 9 February 2022].

Did DFAT provide appropriate advice to the government to inform decision-making and to set directions?

DFAT provided largely appropriate policy advice to the government to inform decision-making and to set directions. Advice was timely and identified key factors and risks relevant to successful implementation. A consistent approach to analysing demand for assistance over the course of the pandemic would have strengthened advice to government on response activity.

3.3 Clear information about the nature and scope of a crisis is critical to setting timely objectives for the government's response, as well as determining who is to be involved and what resources are required for effective execution.

3.4 The ANAO reviewed DFAT's advice to the government over the course of the pandemic to assess whether advice appropriately supported government decision-making on managing the return of overseas Australians.

Timely, relevant and robust advice

3.5 The *Australian Public Service Act 1999* requires public servants to provide 'advice that is frank, honest, timely and based on the best available evidence'.¹⁴¹ Guidance issued by the Department of the Prime Minister and Cabinet, on behalf of the Prime Minister, outlines the responsibility of ministers to 'ensure that proposals prepared for Cabinet consideration...provide concise and robust advice on implementation challenges and risk mitigation strategies'.¹⁴² Public servants play a key role in supporting ministers to meet this responsibility.

3.6 On 24 March 2020, DFAT proposed a high-level framework for supporting Australians to return to Australia through flights and other assistance. The government agreed to a hierarchy of options for providing consular support:

- continued government messaging urging Australians to return via commercial means, whenever possible (this was also aimed at avoiding expectations that the government could evacuate citizens in all instances);
- maintaining airline operations servicing Australia on select existing routes (London, Los Angeles, Auckland and Hong Kong) for a limited period of time (on the basis that large numbers of Australians were in these locations or able to get to them)¹⁴³;
- where commercial services were not able to be accessed by Australians, supporting airlines financially to provide a non-scheduled commercial service¹⁴⁴; and

141 Subsection 10(5) of the *Australian Public Service Act 1999* (Cth).

142 Department of the Prime Minister and Cabinet, *Cabinet Handbook*, 14th edition [Internet], PM&C, Canberra, 2020, available from <https://www.pmc.gov.au/sites/default/files/publications/cabinet-handbook-14th-edition.pdf> [accessed 28 May 2022], p. 11.

143 This was referred to as the International Aviation Network (IAN). This arrangement was reduced to flights from London and Los Angeles only in April 2020 and ceased in June 2020. These locations were assessed by DITRDC as likely to enable a large number of Australians to return to Australia because they were either in these locations or able to access them.

144 The government agreed to support services drawing on the enhanced aviation support package. Airlines were to determine a reasonable fare based on passenger loads.

- after all commercial options had been exhausted, and in response to citizen expectation, considering the use of extractions, potentially with little notice.

3.7 DFAT's advice on options for returning overseas Australians was consistent with commitments stated in the government's Consular Services Charter and public messaging.¹⁴⁵ The March 2020 policy framework emphasised citizen self-reliance while continuing to meet government commitments to provide support in response to crisis conditions created by COVID-19.

3.8 DFAT advised the government in March 2020 that it would not be possible to assist all Australians to return to Australia, and that some would not take up an option to return when available.¹⁴⁶ This appropriately identified resourcing and other constraints in providing consular assistance to all parts of the world and took into account uncertainty about citizens taking up flight opportunities.¹⁴⁷

3.9 Advice provided at different points during the pandemic was not always clearly linked to the framework agreed by the government on 24 March 2020. DFAT also advised the government that the Wuhan evacuations were based on public health grounds, but that this approach should not be continued as the majority of Australians were facing travel disruptions rather than directly health-related issues. The policy basis of this recommendation was not stated.

3.10 At the end of April 2020, DFAT advised the government that despite sizeable cohorts it was not planning 'further facilitated flights from regions in which there have been numerous opportunities to leave through such flights'.¹⁴⁸ DFAT did not identify these regions or provide a rationale for adopting this position. Advice did not include a supporting analysis of risks for overseas Australians still seeking to return to Australia or sensitivities for the government.¹⁴⁹

145 On 25 March 2020, the government issued a media release stating that it would consider, on a case-by-case basis, supporting our airlines to operate non-scheduled services 'where it is feasible, where all other commercial options have been exhausted...We do not have plans for assisted departures, such as those conducted to the epicentre of the COVID-19 outbreak, Wuhan'. See M McCormack and M Payne, (Minister for Infrastructure and Transport and Regional Development and Minister for Foreign Affairs), 'Australians abroad during COVID-19' [Internet], media release, Canberra, 25 March 2020, available from <https://www.foreignminister.gov.au/minister/marise-payne/media-release/australians-abroad-during-covid-19> [accessed 7 March 2022].

The Consular Services Charter states that the government would 'empower Australians to help themselves overseas' and provide crisis support to permanent residents, as well as Australian citizens. See Department of Foreign Affairs and Trade, *Consular Services Charter* [Internet], DFAT, Canberra, 2022, available from <https://www.smartraveller.gov.au/consular-services/consular-services-charter> [accessed 7 March 2022].

146 DFAT advised the government in November 2020 that Australians were located in 130 countries. Around 92 per cent were located in 50 countries. There were 78 countries with fewer than ten registered Australians.

147 The Prime Minister's media statement of 18 March 2020 referred to DFAT advice that it would 'do what it could to provide consular assistance, but that its capacity to do so may be limited by local restrictions on movement, and the scale of the challenges posed by COVID-19'. See S Morrison, (Prime Minister), 'Update on coronavirus measures' [Internet], media statement, Canberra, 18 March 2020, available from <https://www.prm.gov.au/media/update-coronavirus-measures> [accessed 7 March 2022].

DFAT advised the Minister for Foreign Affairs ('the Minister') in May 2020 that despite advice to Australians to return home as soon as possible by commercial means, significant numbers of Australians remained overseas. Most were considered to be long-term residents, dual nationals or able to access local support networks.

148 Flights activity ceased from the end of June 2020 until a standing arrangement was put in place with Qantas Airways (Qantas) in October 2020 for non-scheduled facilitated flights.

149 DFAT advised that approximately 20,000 Australians were registered with DFAT, of whom approximately 16,000 were seeking to return (the majority from India and Pakistan). Advice noted that not all would take up offers of assistance for a range of reasons, including ticket price.

3.11 In May 2020, DFAT recommended to the Minister for Foreign Affairs ('the Minister') considering further facilitated flights in ensuing weeks, focused on COVID-19 'hot spots' where there were vulnerable Australians and no commercial flight options. This advice reiterated that DFAT would return Australians only in specific circumstances.

3.12 DFAT's Consular Services Charter states that consular assistance may be limited in certain circumstances and travellers are responsible for their choices and safety. The charter indicates that in the case of some international crises involving Australians overseas, the government will provide an 'exceptional response'.¹⁵⁰ DFAT's Consular Handbook does not refer to the extent of assistance that should be provided to citizens in a crisis situation or the factors to be considered when determining this at the time a crisis occurs.

3.13 Proposals to limit or cease crisis assistance should be supported by a documented policy framework. Processes for developing advice could consider questions such as: whether all citizens should have access to crisis assistance, irrespective of the difficulty or cost of providing the service; the circumstances under which Australians may not be assisted; and how this should be communicated to the public. This would help ensure such decisions are made consistently and better enable DFAT to manage expectations of the extent of assistance it is able to provide.¹⁵¹

Contribution to whole-of-government advice

3.14 From the beginning of the pandemic, DFAT contributed to whole-of-government advice on policy proposals and other developments which affected its provision of assistance to overseas Australians. These developments included:

- border travel bans and restrictions imposed by Australia and other countries¹⁵²;
- the cancellation of international flight services¹⁵³; and
- changes to travel exemptions for specific cohorts of travellers (for example, business travellers and sports teams).

150 The DFAT Smartraveller website defines a crisis as 'a major event that may affect the safety and well-being of large number of people'. It cites 'pandemic' as an example of an international crisis. See Department of Foreign Affairs and Trade, *Crises* [Internet], DFAT, Canberra, 2022, available from <https://www.smartraveller.gov.au/consular-services/crises> [accessed 7 March 2022].

151 Guidance issued by the Department of the Prime Minister and Cabinet (PM&C) states that advice should be informed by 'multiple and diverse perspectives, including those impacted by the policy, so that there is a robust evidence base'. See Department of the Prime Minister and Cabinet, *Delivering Great Policy* [Internet], PM&C, Canberra, 2021, available from <https://www.policyhub.gov.au/model> [accessed 25 November 2021].

152 Auditor-General Report No.12 2020–21 *Management of International Travel Restrictions during COVID-19*. See paragraphs 3.16–3.19 for a detailed examination of whole-of-government coordination and information sharing arrangements that supported the provision of advice to the government on the management of borders and travel restrictions.

153 Seats available on international scheduled operations in 2020–21 totalled 5.6 million compared to 39.9 million in 2019–20 and 53.9 million in 2018–19. Department of Infrastructure, Transport, Regional Development and Communications, Bureau of Infrastructure and Transport Research Economics, *International airline activity 2020–21, Statistical report*, DITRDC, Canberra, 2021, p. 4. See also Auditor-General Report No.12 2020–21 *Management of International Travel Restrictions during COVID-19*. This report noted that international travel restrictions have constrained the availability and capacity of international flights (see paragraph 1.3).

3.15 After the introduction of mandatory hotel quarantine requirements on 28 March 2020 and caps on passenger arrivals into states and territories from 13 July 2020, DFAT advised on, or supported measures aimed at managing the flow of returning Australians within these constraints.

3.16 DFAT also contributed advice on measures intended to increase the government's scope to return Australians. These included proposals to:

- expand Commonwealth access to quarantine places and use state surge capacity¹⁵⁴;
- maintain the outward travel restriction and limit exemptions to travelling overseas to reduce the numbers of passengers who would then return to Australia; and
- increase the focus on overseas Australians identified as 'vulnerable', with the department advising a stronger national cabinet focus on this objective.¹⁵⁵

3.17 Advice provided by DFAT to the government was timely and relevant to whole-of-government decision-making and changing circumstances.

Use of evidence

3.18 In March 2020, DFAT advised the government that the provision of flights assistance would be subject to 'rigorous assessment of demand'. It provided information on: countries with estimated large numbers of Australians; locations affected by limited commercial flight options; and factors influencing the decisions made by overseas Australians (for example, border restrictions, flight costs and routes and poor health services).

3.19 DFAT provided information such as the: date and location of departure and arrival; numbers of passengers; and post efforts to engage with vulnerable clients to staff in the Minister's Office. DFAT did not develop a consistent or systematic approach to analysing demand or providing information on the reasons why flight offers had been rejected (see paragraphs 3.86–3.87).¹⁵⁶

Did DFAT apply its crisis management arrangements effectively in managing the return of overseas Australians?

DFAT was largely effective in applying its existing crisis management arrangements to respond to government tasking for the return of overseas Australians. DFAT's effectiveness in responding to the COVID-19 crisis was reduced by weaknesses in its existing crisis workforce policies and processes.

154 State jurisdictions allowed returns above designated caps (known as 'surge capacity').

155 During the COVID-19 pandemic Australian governments have met regularly through a mechanism called 'national cabinet'. These meetings have comprised the Prime Minister, state premiers and territory chief ministers. On 29 May 2020, the Prime Minister announced that national cabinet would replace the Council of Australian Governments (COAG).

156 In October 2020, DFAT engaged Services Australia to contact registered Australians to better understand the circumstances of registrants to help with planning additional flights to support the return of Australians. Five follow-up email campaigns were conducted in 2021 to encourage registrants to update their details and confirm their intentions to return to Australia. DFAT advised the ANAO that it did not rely on this survey data because of concerns about its reliability. DFAT undertook some forecasting of demand to support the scheduling of individual facilitated flights.

3.20 DFAT's provision of assistance to overseas Australians seeking to return to Australia occurred in two main phases.

- *Phase 1: January 2020–September 2020.* DFAT applied and extended its crisis management arrangements for evacuating Australians in emergency conditions.
- *Phase 2: October 2020–February 2022.* DFAT continued to use its crisis management processes and established a program of flights under a commercial agreement.

3.21 The first phase of DFAT's flights activity included chartered evacuations from Wuhan and Tokyo, and operations targeting 'hot spots' in several parts of the world.

3.22 As a case study, the ANAO examined whether DFAT used its crisis management mechanisms effectively to evacuate Australians from Wuhan, China on 3 and 9 February 2020. It reviewed DFAT's actions with reference to the crisis management functions outlined in Table 1.1 of this report, focussing on early warning and intelligence, and direction and coordination of effort.

3.23 The second phase of DFAT's flights activity commenced with the establishment of standing arrangements with Qantas Airways (Qantas) (see paragraphs 3.67–3.95).

Early warning and intelligence

Detection and monitoring

3.24 Arrangements which enable risks to be detected and an emerging crisis to be monitored are critical to effective government decision-making.¹⁵⁷ DFAT's arrangements for monitoring international developments enabled it to report on the emergence of the COVID-19 virus in China. Case study 1 details DFAT's activities in analysing and reporting information to support its evacuation of Australians from Wuhan.

Case study 1: Early warning and intelligence — Wuhan evacuation (3 February 2020)

- 2 January — Shanghai post reports on a respiratory disease outbreak in Wuhan.
- 4 January — The Global Watch Office (GWO) includes information on COVID-19 in its daily brief. Regular monitoring commences from 17 January.
- 8 January — DFAT provides media talking points to the Foreign Minister's Office.
- 23 January — Shanghai post reports on a respiratory disease outbreak in Wuhan. Beijing post coordinates with mainland posts to consolidate reporting from China.^a
- 24 January — Shanghai post reports on consular and business continuity matters at mainland China posts.
- 26 January — The Emergency Call Unit (ECU) is activated. A total of 429 individuals in Wuhan are recorded as seeking assistance. DFAT advises the government of difficulties in determining how many people in Wuhan may be eligible for evacuation. DFAT contacts 'like-minded' countries on planning for evacuations.

157 The process of collecting, assessing and documenting information to define the environment is an ongoing and iterative process. See Department of Home Affairs, Emergency Management Australia, *Crisis Appreciation and Strategic Planning — Guidebook* [Internet], Home Affairs, EMA, Canberra, 2021, p. 21, available at <https://www.homeaffairs.gov.au/emergency/files/casp-guidebook.pdf> [accessed 25 October 2021].

- DFAT advises the government on planning for assisted departures six times between 27 January and 3 February.
- 2 February — Guangzhou post meets with representatives from key partner countries to share information about evacuation planning.
- 3 February — First assisted departure from Wuhan.

Note a: Beijing post is responsible for coordinating whole-of-China post responses, when necessary, involving Chengdu, Guangzhou, Shanghai and Shenyang posts.

Source: ANAO analysis of data provided by DFAT.

Management of information

3.25 From the early stages of the pandemic, all posts issued daily situation reports ('sitreps') via the department's cable system. Because of the large volume of daily cables directed to Canberra, the Consular and Crisis Management Division (CCD) established teams to summarise their content for higher-level attention.

3.26 In May 2020, the GWO distributed 'COVID-19 cable summaries' twice daily to the Minister, the Executive, other entities and ministerial offices. These provided headline information received from posts and listed cables with recommendations for action, such as changes to travel advice.

3.27 In circumstances where a large amount of information is required to be analysed within short timeframes, there would be benefit in standardising the gathering, analysis and reporting of data and information by posts (for example, by establishing set reporting categories).¹⁵⁸

3.28 DFAT obtains data from a wide range of sources encompassing: open channels (for example, media, internet, twitter); confidential reporting and intelligence products; as well as client information received through its call centres and held in its consular systems. DFAT should develop an information strategy and governance framework to appropriately support its crisis management function. This should include evaluating the role of cables in DFAT's collection and analysis of early warning and detection data, noting that this information is also relied upon by other entities.

158 'Raw information must be translatable into intelligence products accessible and appropriate for the needs of stakeholders and decision makers at all levels. This includes the mechanisms for timely information broadcast and transfer...and systems of data interpretation'. See Department of Home Affairs, Australia-New Zealand Emergency Management Committee, *Australian Disaster Preparedness Framework. A guideline to develop the capabilities required to manage severe to catastrophic disasters* [Internet], Home Affairs, ANZEMC, Canberra, 2018, p. 11, available from <https://www.homeaffairs.gov.au/emergency/files/australian-disaster-preparedness-framework.pdf> [accessed 22 March 2022].

Recommendation no. 3

3.29 DFAT establish a data and information strategy and capability to strengthen its capacity to rapidly and effectively source, analyse and use data from all sources for crisis planning and response.

Department of Foreign Affairs and Trade response: *Agreed.*

3.30 *Consular and Crisis Management Division is developing a Data Strategy, as part of the Consular Modernisation Program. This will align with the broader DFAT (department wide) data strategy.*

Direction and coordination of effort

3.31 Once the government's goals and preferred approach are known, operational objectives can be set to ensure clear and consistent implementation of response measures.¹⁵⁹ These should translate into coordinated activities aimed at achieving strategic priorities.

Direction from DFAT's Canberra office

3.32 Crisis response processes should enable a wide range of entities to work together flexibly and efficiently.¹⁶⁰ In the early stages of the pandemic, DFAT participated in key cross-government coordination and decision-making forums.

3.33 DFAT placed an officer in the National Incident Room when it was activated on 22 January 2020 and contributed to meetings of the Australian Government Crisis Committee (AGCC).¹⁶¹ From March 2020, inter-departmental committees (IDCs), working groups and regular meetings were established at different levels to coordinate activities across the Australian Government. DFAT also participated in a National Coordination Mechanism (NCM) Working Group managed by the Department of Home Affairs, enabling it to coordinate with state and territory entities.

3.34 In September 2020, the Department of the Prime Minister and Cabinet (PM&C) established a Deputy Secretary-level COVID-19 Deputies IDC to coordinate response actions across the Australian Government, with 'Bringing Australians Home' a standing agenda item. On 18 September 2020, the Prime Minister directed that an interagency taskforce be established to support the return of Australians before Christmas. The DFAT-led 'Taskforce to assist Australians to Return' was

159 'Activities at the strategic level provide the foundation for all response actions and priorities, defining the desired end states and providing the critical sense making to support the operational and tactical levels...The operational level...focus is on operational decision-making and plans that implement the strategic intent'. See Department of Home Affairs, EMA, *Crisis Appreciation and Strategic Planning — Guidebook* [Internet], p. 12.

160 'Whole-of-government coordination arrangements provide strategic coordination: to ensure ministerial directions are effectively implemented across government, including with the states and territories, and with affected industry and the community'. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 3.1 [Internet], p. 34 (also see version 2.2, p. 25).

161 The NIR was activated to coordinate the health sector response to COVID-19 across the Australian Government and the states and territories.
The AGCC, which is co-chaired by Deputy Secretaries from the departments of Home Affairs and PM&C, was responsible under the AGCMF for coordinating the Australian Government's response to domestic crises, including public health emergencies. It ceased this role following the establishment of the National Coordination Mechanism on 5 March 2020. The AGCC was convened nine times to discuss COVID-19 from 25 January 2020 to 28 February 2020.

charged with maximising opportunities for Australians, and particularly vulnerable people, to return to Australia.

Direction and coordination of effort at post

3.35 DFAT's Canberra office advised its overseas network on 18 March 2020 that due to pandemic conditions all posts should have activated their Crisis Action Plans (CAPs) (see paragraphs 2.72–2.74). Just under half of all posts had activated their CAPs by the following day.¹⁶²

3.36 CAPs stipulate that the HOM/HOP or deputy has responsibility for leading crisis response and is designated to act as 'Crisis Controller'. The crisis controller is the senior officer responsible for the overall management of an incident or crisis.¹⁶³ Responsibilities detailed in the CAP include:

- activating the CAP to an appropriate level (yellow, red or orange)¹⁶⁴;
- chairing the post's crisis committee (PCC), authorising courses of action and directing resources and tasking staff¹⁶⁵;
- assessing the post's ability to respond and requesting additional resources where required; and
- managing interaction with other missions and senior officials in Canberra, representatives of other countries, media and ensuring the welfare of staff and families.

The PCC provides a flexible 'whole of post' mechanism for setting direction and exercising control throughout the management of a crisis or incident.

3.37 DFAT policy should also specify a requirement for the post to document:

- specific objectives and plans and activities to achieve these; and
- results against objectives to gauge performance to enable corrective action and inform subsequent activity.

3.38 The Wuhan case study 2 below details the interaction of DFAT's Canberra office and post, and coordination with other Australian Government entities, in planning for and coordinating the evacuation.

162 Since October 2020, the Global Watch Office (GWO) has issued a daily summary report of the status of each post's level of Crisis Action Plan (CAP) activation.

163 The term is not defined outside the CAP (for example, in DFAT's Consular Handbook). In emergency management policy, this role is also referred to as the 'incident controller'. See Australian Institute for Disaster Resilience, *Australian Emergency Management Arrangements* [Internet], p. 21.

164 When the CAP is activated to 'Yellow' the PCC meets to assess resource requirements and provide regular updates on the situation. Full activation of the CAP to 'Red' requires post to advise Canberra of its response and identify assistance and resources that may be required. In October 2021, DFAT revised CAP activation categories to include 'Orange — protracted recovery'. This phase indicates when a crisis continues to affect post operations for an extended period.

165 In the lead up to DFAT's evacuations from China, the HOM for Shanghai acted as crisis controller before handing over to the HOM for Beijing.

The CAP identifies key DFAT personnel responsible for functions such as consular services, transport, media, security, communications and record-keeping. Staff from other Australian Government entities with a presence at post (for example, Defence and Home Affairs) are also represented.

The Post Crisis Committee (PCC) is also referred to as the 'Post Response Committee', 'Post Crisis Response Committee' or the 'Crisis Response Committee'.

Case study 2 Setting direction — Wuhan evacuation (3 February 2020)

- 24 January — Crisis Action Plans are activated at 'Yellow — crisis imminent' for Beijing, Shanghai (responsible for Wuhan) and Guangzhou posts. Posts' response committees are stood up. China posts engage with Chinese authorities to request permission for Australians to depart.
- 27 January — an Australian Government Crisis Committee (AGCC)^a meeting is convened to plan for the possible repatriation of Australians from China. Drawing on post advice, DFAT advises the Minister on a range of issues, risks and sovereign sensitivities that would need to be considered as part of evacuation planning.
- 28 January — FAS CCD convenes a strategic planning meeting involving the departments of Defence, Health and Home Affairs. CAPs for Beijing, Shanghai and Guangzhou are raised to 'Red — crisis occurring'.
- 29 and 31 January — The government approves the Wuhan evacuation plan which gives priority to isolated and vulnerable individuals. Operational matters considered include airlift options; conditions to which citizens would need to agree; requests for assistance by other countries; diplomatic actions; and on the ground consular support. Responsible ministers meet several times to review planning.
- 29 January — The Prime Minister announces arrangements with Qantas to enable assisted departures from Wuhan.
- 30 January — A Crisis Response Team deployed from Shanghai post arrives in Wuhan to set up a temporary consular office and to engage with local authorities on departure planning.
- 1 February — DFAT activates its Crisis Centre to support evacuation operations.
- 3 February — First assisted departure from Wuhan.

Note a: While international crises are usually coordinated through the DFAT-chaired Inter-Departmental Emergency Taskforce (IDETF), the Wuhan evacuations were planned using the Australian Government Crisis Committee (AGCC), a coordination mechanism for entities engaged in domestic crisis response. The AGCC is chaired by the Deputy Secretary of Home Affairs or PM&C. See Department of the Prime Minister and Cabinet, *Australian Government Crisis Management Framework*, version 2.2, PM&C, Canberra, 2017, p. 24.

Source: ANAO analysis of data provided by DFAT.

Documenting operational decision-making at post

3.39 It is important that objectives set at the outset of a crisis are continually revisited to enable actions to be adjusted or corrected, if necessary. Documenting objectives and sharing these with all responders can support this process of adapting to new circumstances.¹⁶⁶

3.40 Crisis Actions Plans specify that the post's crisis committee's (PCC) communications and record-keeping officer is responsible for recording the objectives and outcomes of crisis response and maintaining crisis records, including a log of events. Decision-logs were not maintained by the posts reviewed by the ANAO. DFAT guidance should include processes for documenting operational

166 'Information is crucial to decision making...Emergency managers...are responsible for providing and sharing clear, targeted and tailored information to those who need it, and to those at risk, to enable better decision making by all stakeholders'. See Australian Institute for Disaster Resilience, *Australian Emergency Management Arrangements* [Internet], p. 2.

crisis response objectives, agreed actions and outcomes to ensure there is transparency about operational activity (see paragraphs 2.48–2.54).

Mobilisation of resources to support crisis response

3.41 When responding to crises, entities make decisions about how effort and resources should be directed to achieve government objectives and priorities. The large scale and extended duration of the COVID-19 pandemic has required DFAT to mobilise resources to support the rapid implementation of responses and to sustain this effort. The ANAO reviewed DFAT's effectiveness in allocating and managing its staffing resources in Canberra and at post in responding to COVID-19 and managing the return of overseas Australians.

3.42 DFAT's Business Continuity Pandemic Plan (BCPP), endorsed on 25 March 2020, stated the department would prioritise the welfare of staff, including by:

workforce planning and management that anticipates prolonged, high tempo operations in Canberra and overseas, a potential reduction in workforce numbers across the globe, and deals with workplace health and safety obligations.

3.43 The BCPP identified critical departmental functions, including consular and crisis management and staffing.

Crisis management surge mechanisms

3.44 DFAT used existing surge mechanisms to meet increased demand for consular services (see Appendix 7). As at May 2021, CCD had increased its permanent full-time equivalent staffing from 72 in 2019 to 216.

Post access to resources

3.45 Posts are generally the first responders to a crisis. Over the course of the pandemic, the number of staff located at posts reduced. This was due to DFAT implementing voluntary and directed departures for staff at posts and fewer short-term deployments. DFAT advised the ANAO that relocated staff often continued to work in the position they held at post. If the capacity of a post was exceeded, it could request support from other parts of the department.

Policies and systems for surge management during crises

3.46 While DFAT implemented a range of strategies to assign resources to areas of need, it lacks many of the strategic and operational frameworks and systems used by emergency response entities to manage their workforce.

Strategic workforce planning for crisis management.

3.47 DFAT has not identified current and future workforce requirements for staff skilled in consular and crisis management.¹⁶⁷ This applies to both Australian and Locally Engaged Staff (who are integrally involved in crisis response). Crisis response entities often require staff to carry out

167 The Australian Public Service Commission defines strategic workforce planning as the 'process of identifying an organisation's current and future workforce needs against strategy and deliverables, and planning for and mitigating workforce risks arising from identified workforce gaps'. Australian Public Service Commission, *Workforce Planning Resources* [Internet], APSC, Canberra, 2021, available from <https://www.apsc.gov.au/initiatives-and-programs/aps-workforce-strategy-2025/workforce-planning-resources> [accessed 21 March 2022].

specific duties and manage extreme situations when assisting those affected by a crisis. DFAT lacks a competency framework for crisis roles.¹⁶⁸

Fatigue and staff welfare policies and guidelines

3.48 The demands of crisis response can have physical and psychological impacts on staff. Reporting to the Executive in May 2021 identified a need to address ‘expectations that the successful DFAT officer can handle any level of pressure and ‘get it done’, under any circumstances and for any length of time’.

3.49 Under Commonwealth law, DFAT has a responsibility to do all it reasonably can to manage risks in the workplace, including fatigue.¹⁶⁹ DFAT has a critical incident mental health support policy which aligns with its 2018–22 mental health policy and strategy.¹⁷⁰ This policy recognises DFAT staff are more likely to be exposed to a critical incident compared to many public servant occupations.¹⁷¹ The policy encourages managers to monitor staff for signs of fatigue and stress, and advice on support services is available through DFAT’s Staff and Family Support Office located in its People Division.¹⁷² DFAT also has a policy for the support of staff, families and Locally Engaged Staff in overseas posts who are at higher risk of experiencing critical incidents or where there is limited opportunity for respite from high levels of operational effort.

3.50 DFAT’s Enterprise Agreement and Human Resources Manual (manual) set out general conditions of employment for APS staff in the department, including for the management of shift work. The manual details some arrangements which apply to staff appointed to Consular Emergency Centre (CEC) and Global Watch Office (GWO) crisis management roles.¹⁷³ General guidance on the management of fatigue in the workplace is available to entities responsible for

168 Under emergency management law, the New Zealand government response entities are required to conduct planning and implement processes for developing adequately trained and competent personnel against identified competencies. The framework is used to develop ‘skill and knowledge statements’ for specific roles. See Ministry of Civil Defence and Emergency Management, *Civil Defence Emergency Management Competency Framework. Technical Standard 02/09* [Internet], Wellington, 2011, available from [Competency Framework Toolkit » National Emergency Management Agency \(civildefence.govt.nz\)](https://www.civildefence.govt.nz/competency-framework-toolkit) [accessed 21 November 2021].

169 Section 17 of the *Work Health and Safety Act 2011* (Cth). Safework Australia defines fatigue as ‘a state of mental and/or physical exhaustion which reduces a person’s ability to perform work safely and effectively’. See Safework Australia, *Guide for Managing the Risk of Fatigue at Work* [Internet], Canberra, 2013, p. 4, available from <https://www.safeworkaustralia.gov.au/system/files/documents/1702/managing-the-risk-of-fatigue.pdf> [accessed 12 March 2022].

170 The Mental Health Strategy for 2022–25 is due to be completed by June 2022.

171 DFAT’s Critical Incident Mental Health Support Policy identifies a range of critical incidents, including natural disasters, terrorist attacks, exposure to distressing circumstances and a public health crisis.

172 DFAT has developed a policy for the support of staff, families and Locally Engaged Staff in overseas posts who are at higher risk of experiencing critical incidents or where sustained high levels of operational effort exist with limited opportunity for respite.

173 As an example, staff who have worked in these roles for three years are encouraged to seek an alternative position within 12 months.

emergency or crisis management.¹⁷⁴ There would be value in DFAT developing guidelines for assisting staff to manage fatigue and stress when a large number of staff across work units are exposed to crisis conditions overseas, or for sustained periods of time.

3.51 While DFAT policies recognise staff may experience sustained crisis conditions, the department may not have sufficient capacity to provide support services to the level that may be needed. A paper provided to DFAT's Performance Risk and Resourcing Committee in May 2021 advised the Executive that inadequate resourcing of support services meant DFAT had limited capacity to provide support during crises and the full scope of services indicated by its enterprise mental health strategy.¹⁷⁵ It noted that the COVID-19 crisis had increased demand for services already at capacity pre-pandemic, and that managers were not properly trained and supported to exercise their Work Health and Safety duty of care.

Workforce management tools

3.52 DFAT uses spreadsheets to record redeployed staff and for 24/7 rostering. These spreadsheets do not have inbuilt guards against shift conflicts or potential non-adherence to Work Health and Safety requirements. Ineffective rostering may also lead to excessive use of overtime and staff fatigue.¹⁷⁶ DFAT is not able to accurately record actual staff effort dedicated to consular activities either under business-as-usual or crisis conditions.

3.53 The Emergency Call Unit, Crisis Cadre and Crisis Response Teams maintain registers of staff who have worked in their team.¹⁷⁷ This allows them to quickly identify staff who have relevant experience and may be able to be deployed during a crisis.

174 An example of available guidance on the management of fatigue in response agencies is provided by Safework South Australia. See Safework South Australia, *Emergency Services: Guideline for risk managing fatigue* [Internet], Adelaide, 2016, available from https://www.safework.sa.gov.au/_data/assets/pdf_file/0005/140666/Emergency_services_guideline_for_risk_managing_fatigue.pdf [accessed 12 March 2022]. 'Incidents are often physically and mentally demanding. Remaining aware of team limitations and managing fatigue minimises the risk of adverse outcomes in incident management', 'Effective rostering requires consideration of 'shift times, lengths and fatigue limits and rest periods between shifts'. See Inspector-General of Emergency Management, *Review of incident management teams: accreditation and rostering* [Internet], IGEM, Melbourne, 2017, pp. 12, 17, available from <https://www.igem.vic.gov.au/publications/publications/review-of-incident-management-teams-accreditation-and-rostering> [accessed 12 March 2022].

175 The paper referred to a review conducted in March 2020 by a health and human services consultancy and a 2019 review conducted by the Asia Pacific Centre for Work Health and Safety. In 2020–21 DFAT reported that it had provided access to counselling for 1103 staff and family members and staff training on mental health first aid and stress management during periods of remote working. Department of Foreign Affairs and Trade, *Annual Report 2020–21* [Internet], p. 123. This figure includes Locally Engaged Staff.

176 See Auditor-General Report No.39 2018–19 *The Bureau of Meteorology's Delivery of Extreme Weather Services*, pp. 47–48.

177 The Emergency Call Unit may provide call centre functions during a crisis. The Crisis Cadre is a team which supports the coordination of effort in DFAT and across government during a crisis. Crisis Response Teams are DFAT staff deployed overseas to assist a post's response to a crisis.

Recommendation no. 4

3.54 DFAT plan for and build a fit-for-purpose crisis management workforce strategy and ensure appropriate systems are implemented to support the management of staff during crisis response.

Department of Foreign Affairs and Trade response: *Agreed.*

3.55 *DFAT's existing crisis management workforce structures will be reviewed and revised. Also refer to response to Recommendation 1.*

Did DFAT establish effective new arrangements to support overseas Australians to return to Australia?

DFAT provided support to overseas Australians to return to Australia from January 2020. After a pause in flights activity from July 2020 to October 2020, DFAT built on existing consular processes to provide assistance through a new program of flight activity and financial assistance. DFAT's delivery of flights to return overseas Australians was largely effective. It did not maintain accurate and reliable data on registered Australians, including those identified as vulnerable. Before October 2020, it did not maintain authoritative records or accurate data on Australians supported to access flights.

3.56 The provision of consular and crisis assistance to Australians overseas should be supported by fit-for-purpose arrangements, including policies, systems and procedures for implementation. The ANAO reviewed DFAT's:

- delivery of flights assistance, including contractual and administrative arrangements and its use of financial and performance information; and
- financial and flights assistance provided to vulnerable Australians.

Types of flights assistance

3.57 Throughout the pandemic, DFAT's overseas posts provided support to Australians to access a range of different flight arrangements. These included support to Australians to access: scheduled commercial and charter flights; facilitated commercial flights (FCFs); and assisted departures.¹⁷⁸ DFAT advised the ANAO that there were 227 FCFs in total. These includes flights under contracts with Qantas Airways and Singapore Airlines (22 October 2020 to 24 February 2022), and additional FCFs which had no contract and/or did not involve a financial commitment by the Australian Government (see also paragraphs 3.63, 3.67–3.95).

178 As an example of DFAT support, Manila post reported it had enabled Australians to access 29 sweeper flights, connecting to 11 international flights from Manila to Australia between April 2020 and May 2020.

Phase 1: Procurement and flights administration January 2020–September 2020

3.58 The *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and Commonwealth Procurement Rules (CPRs) provide the framework under which government entities are required to undertake procurement activities.¹⁷⁹

3.59 Paragraph 2.6 of the CPRs states that these do not apply to the extent that an official applies measures determined by their accountable authority to be necessary under certain circumstances. These relate to the maintenance or restoration of international peace and security, protecting human health, essential security interests, or national treasures of artistic, historic or archaeological value. Exempt procurements remain subject to other requirements of the CPRs, including the core principle of achieving value for money.

3.60 DFAT does not have procedures for emergency procurements or guidance for officials when applying paragraph 2.6 of the CPRs. DFAT contracted Qantas Airways on 1 February 2020 to return 725 people on three evacuation flights.¹⁸⁰ The Secretary of DFAT approved retrospectively the application of paragraph 2.6 of the CPRs for these flights on 28 February 2020. In approving the application, the Secretary noted that ‘the broad arrangements were discussed with me at the time’. The rationale for applying paragraph 2.6 was the ‘health emergency’ created by COVID-19 which had resulted in border closures.

3.61 Although the approval stated DFAT would adhere to value for money principles, it did not specify how it would obtain value for money or document if this was achieved.¹⁸¹ It did not maintain sufficient records of procurement arrangements for another 27 contracted flights from 31 March 2020 to 6 June 2020.¹⁸² DFAT did not contract further flights until October 2020.

3.62 When circumstances governing the original use of paragraph 2.6 of the CPRs have changed, the accountable authority should determine whether it is appropriate to continue to apply the clause, including when contracts are varied or extended, or new procurements for similar services are undertaken.¹⁸³ In October 2021, the Prime Minister announced measures to remove overseas travel restrictions related to COVID-19 from 1 November 2021.¹⁸⁴ On 14 November 2021, the Secretary noted departmental advice on changes in government policy and the likely need for further facilitated commercial flights. The Secretary agreed to continued direct approaches to Qantas and other airlines to enable flexible procurements to ‘protect human health’ and ‘assist as

179 Department of Finance, *Commonwealth Procurement Rules* [Internet], Finance, Canberra, 2020, available from <https://www.finance.gov.au/sites/default/files/2020-12/Commonwealth%20Procurement%20Rules%20-%2014%20December%202020.pdf> [accessed 13 March 2022].

180 Two flights from Wuhan and one flight from Tokyo supporting the evacuation of Australians from the Diamond Princess cruise ship.

181 DFAT’s procurement policy states that each step in the procurement process is to be documented in a manner commensurate with the scope, scale, risk and complexity of the proposed arrangement.

182 DFAT advised the ANAO that 12 flights in this period were contracted by the Department of Infrastructure, Transport, Regional Development and Communications.

183 The 2021–22 Budget provided funding for the continuation of facilitated commercial flights to mid-2022. Department of Foreign Affairs and Trade, *Portfolio Budget Statements 2021–22* [Internet], DFAT, Canberra, 2021, p. 18, available from <https://www.dfat.gov.au/sites/default/files/pbs-2021-22-foreign-affairs-and-trade-portfolio-budget-statements-2021-22.pdf> [accessed 23 February 2022].

184 See S Morrison, (Prime Minister), ‘Next steps to reopen to the world’ [Internet], media release, Canberra, 1 October 2021, available from <https://www.pm.gov.au/media/next-steps-reopen-world> [accessed 23 February 2022].

many vulnerable Australians as possible'.¹⁸⁵ This advice did not set out how value for money would be achieved.

3.63 ANAO analysis of data recorded in a DFAT flights tracking spreadsheet indicates it supported 3500 people to return to Australia on 27 government contracted flights during the first phase of DFAT's activity. DFAT did not maintain authoritative records of Australians supported to access these flights, such as final flight manifests. The accuracy of flights data contained in the tracker, including the number of contracted flights and passengers could not be verified.

Recommendation no. 5

3.64 DFAT develop emergency procurement guidelines to support officials to meet their obligations when paragraph 2.6 of the Commonwealth Procurement Rules (CPRs) is set aside during a crisis.

Department of Foreign Affairs and Trade response: *Disagreed*

3.65 *DFAT has in place existing information and advice on their obligations regarding procurement and contractual arrangements. In responding to COVID-19, the Consular and Crisis Management Division complied with its obligations under the CPRs and DFAT's procurement-related policies and guidelines.*

ANAO comment on Department of Foreign Affairs and Trade response

3.66 DFAT's statement that it complied with its obligations under the CPRs and DFAT's procurement-related policies and guidelines does not reflect evidence obtained by the ANAO during this audit. The CPRs require entities to adhere to the core principle of value for money even when, under specific circumstances, procurements are sourced from a single provider. DFAT did not set out how value for money would be achieved at any point in its procurement activity when applying paragraph 2.6 of the CPRs (see paragraphs 3.60–3.61). It also did not maintain sufficient records of procurement arrangements for another 27 contracted flights from 31 March 2020 to 6 June 2020 (see paragraph 3.61). The ANAO was unable to verify DFAT's compliance with the CPRs and other requirements for these flights.

Phase 2: Procurement and administration of government contracted flights — October 2020 onwards

3.67 After the government stated on 18 September 2020 that it hoped to return all overseas Australians by Christmas 2020, DFAT put forward an implementation plan in October 2020 which proposed re-introducing government contracted flights, which had not operated since June 2020

185 DFAT considered it likely that Human Biosecurity Emergency period would continue for a further three months beyond 17 December 2021. On 10 December 2021, the government extended these arrangements to 17 February 2022. See G Hunt, (Minister for Health), 'Human biosecurity period extended' [Internet], media release, Canberra, 10 December 2021, available from <https://www.health.gov.au/ministers/the-hon-greg-hunt-mp/media/human-biosecurity-period-extended> [accessed 23 February 2022].

(discussed at paragraphs 3.60–3.63). On 13 October 2020, DFAT commenced a contract with Qantas to facilitate commercial flights, applying paragraph 2.6 of the CPRs.¹⁸⁶

3.68 The Australian Government's *Contract Management Guide* states that the development of a contract management plan is required for complex and strategic procurements.¹⁸⁷ DFAT did not establish a contract management plan to support the administration of its flights contract, as it regarded the procurement as routine. It did not document its rationale for this assessment.

Planning and approvals

3.69 DFAT's plan for returning Australians before Christmas 2020 included the development of schedules of government contracted flights. In approving this plan, the government re-stated its commitment to the return of Australians, particularly, vulnerable Australians. It provided funding approvals to contract flights from Qantas between 22 October 2020 and 31 December 2021.

3.70 DFAT established largely appropriate processes for scheduling contracted flights. Scheduling was based on its analysis of data on registered Australians at overseas locations, commercial airline seat availability, quarantine capacity and qualitative input from posts.

3.71 As at 20 January 2022, DFAT had approved 29 flight contract schedules for 152 contracted flights.¹⁸⁸ Not all flights operated as scheduled. In response to the government imposing a pause on incoming travel from India on 27 April 2021, DFAT approved a revised contract schedule documenting the cancellation of five flights originally scheduled for May 2021.

Access to flights assistance

Booking registered Australians on government contracted flights

3.72 Registered Australians not identified by DFAT as vulnerable were able to book seats on contracted flights via a dedicated website and link. Access to the link was provided 48 hours after it had been issued to passengers identified as vulnerable. DFAT maintained wait and call lists to document registered Australians offered flights or interested in accepting flight offers at short notice.

3.73 DFAT's COVID-19 Crisis Citizen Information (CCCI) database includes fields to record contact with registered Australians.¹⁸⁹ DFAT did not maintain data on its contacts with registrants or

186 A contract variation was signed on 30 March 2021, incorporating additional requirements for mandatory COVID-19 testing in line with government policy.

In November 2021, DFAT also applied paragraph 2.6 when it contracted Singapore Airlines to provide six flights from Singapore in November 2021.

187 The aim of contract management is to ensure that all parties meet their obligations to deliver the objectives of the contract. The use of a contract management plan is recommended for routine procurements and required for complex and strategic contracts. See Department of Finance, *Australian Government Contract Management Guide* [Internet], Finance, Canberra, 2020, pp. 2, 13, available from <https://www.finance.gov.au/sites/default/files/2020-12/Contract%20Management%20Guide%20December%202020%20-%20Master.pdf> [accessed 4 March 2022].

188 DFAT contracted one flight in September 2021 for the transport of vaccinations from the UK to Australia and four flights supported by DFAT were contracted by Austrade.

189 This was implemented in April 2020.

attempts to contact registrants in 99 per cent of cases.¹⁹⁰ DFAT commenced documenting phone calls and emails sent and received in relation to flights assistance in a spreadsheet in April 2021.

Identification of vulnerable people for flights

3.74 The APS Code of Conduct requires public servants to ensure all decisions and interactions with clients are objective and impartial, and in accordance with government policy.¹⁹¹ The development of appropriate guidance for administering programs helps them to be rigorous and consistent in determining who should receive benefits. The ANAO examined DFAT's delivery of services to overseas Australians with vulnerabilities.

3.75 DFAT identified vulnerable Australians when they contacted posts and through its CCCI database. Hardship Program recipients were classified as vulnerable and generally pre-booked on contracted flights where these were available from their location.¹⁹²

3.76 The online registration form did not have a specific field for registrants to include information about their vulnerabilities. Some registrants provided information on their vulnerability in an 'additional information' field on the registration form. Before December 2020, DFAT used key word searches of the 'additional information' field in the CCCI database to identify potentially vulnerable registered Australians.

3.77 DFAT posts were tasked in December 2020 to continue to engage with clients and review client files with any suggested changes to their vulnerability status to be forwarded to its Canberra office.

3.78 In March 2021, DFAT developed a Vulnerable Client Policy which states that vulnerable Australians include individuals with no financial means to support themselves, visa issues and medical conditions.¹⁹³ The policy does not make clear how assessments of vulnerability are to be documented. The CCCI user guide states that users should include information about any concerns raised by a traveller including health and medication, access to money, food and accommodation, movement restrictions, problems with visas and whether they are requesting assistance to return to Australia.

3.79 DFAT did not consistently document its assessment of vulnerability or maintain accurate and reliable data on registered Australians it assessed as vulnerable. DFAT cannot demonstrate that it assessed vulnerability appropriately to support the prioritisation of access to contracted flights for vulnerable Australians. The ANAO's review of DFAT's management of data relating to vulnerability assessments and reporting is set out in Appendix 8.

190 The CCCI system includes data fields for 'date of last contact' and 'date of last attempted contact'.

191 Australian Public Service Commission, *APS Values and Code of Conduct in Practice* [Internet], APSC, Canberra, 2017, paragraph 2.2.3, p. 18, available from <https://www.apsc.gov.au/publication/aps-values-and-code-conduct-practice> [accessed 12 January 2021].

192 Hardship Program recipients located in countries where contracted flights are not operating are booked on scheduled commercial flights.

193 Before the development of the policy DFAT assessed vulnerability in accordance with its Consular Handbook.

Recommendation no. 6

3.80 DFAT develop clear policies and procedures for assessing and recording vulnerability to ensure it is able to appropriately demonstrate the basis of its decision-making on the provision of benefits to the public.

Department of Foreign Affairs and Trade response: *Agreed.*

3.81 *Australians most in need are at the forefront of DFAT consular service delivery, including during crises. DFAT has in place established fit-for-purpose policies and procedures for assessing vulnerability. DFAT's existing policy provides that consular officers assess and record vulnerability relating to consular cases. DFAT will strengthen this advice to demonstrate decision-making processes during crisis responses, with consideration of the specific circumstances and scale applicable to the relevant crisis.*

Booking vulnerable passengers on government contracted flights

3.82 In February 2021, DFAT developed procedural guidance to support the booking of passengers on flights in accordance with its objective of prioritising vulnerable Australians. Procedures included providing an exclusive 48-hour booking window available only to passengers assessed by DFAT as vulnerable.¹⁹⁴

3.83 DFAT did not consistently conform to the 48-hour booking window and advised the ANAO that the clause was not always practical or effective. DFAT analysed three flights in July 2021 and found that 81 per cent of people who booked through the priority booking weblink were not on the list of vulnerable clients offered priority booking. DFAT concluded that this was likely due to travellers sharing booking weblinks, including via social media.

3.84 DFAT advised the ANAO that it made iterative changes to its approach to booking passengers to take account of changes in demand; the needs of clients in different geographic locations; and to address problems as they arose. DFAT implemented updated policy and procedural guidance in March 2021 setting out different approaches to booking and prioritising vulnerable Australians, including for specific locations such as the United Kingdom and India.

3.85 There was significant variation in the proportion of passengers booked on government-contracted flights identified as vulnerable by DFAT. Analysis of flights included in Appendix 9 shows that the percentage of vulnerable passengers booked ranged from two per cent to 88 per cent, with an average of 29 per cent across the 93 flights reviewed by the ANAO.

3.86 Booking vulnerable passengers was complicated by individuals rejecting flight offers. DFAT advised the ANAO that Expressions of Interest (EOI) were sent to vulnerable clients on a number of flights 24–48 hours prior to the release of the weblink to the remaining clients. DFAT advised the ANAO that the majority of vulnerable clients did not respond to these, and not all vulnerable clients who accepted flight offers proceeded with the arrangement or boarded the flights. Following the low take-up of seats through the EOI process, between 20–100 seats were blocked on facilitated commercial flights for vulnerable clients unable to secure bookings via the weblink.

¹⁹⁴ Qantas issued a weblink (or URL) to a priority booking site, which DFAT then emailed to Australians identified as vulnerable.

3.87 For some flights, DFAT documented responses to EOIs for flights, including the reasons for registrants not accepting flights. As this information was not recorded in a systematic or consistent way, it could not be used to support an analysis of the key reasons for registrants not accepting flight offers.¹⁹⁵

3.88 DFAT provided direction to staff in April 2020 stating that DFAT staff and dependants returning to Australia could only travel on facilitated flights if they did not displace Australians seeking to return to Australia. DFAT did not identify a risk that staff may give preferential access to friends or may be placed under pressure to provide access to others. It did not establish controls for detecting and preventing these risks. In March 2022, the ANAO provided DFAT with information indicating this risk may have been realised.

Delivery of flights

3.89 Final flight manifests provide an authoritative record of passengers who travelled on each government-contracted flight. DFAT developed appropriate procedural guidance for the preparation of flight manifests. This included recording the final passenger list and the vulnerability status of passengers, including those who had received assistance through DFAT's COVID-19 Special Overseas Hardship Program (Hardship Program) (see paragraphs 3.96–3.99). Manifests also listed passengers who had withdrawn from a flight.¹⁹⁶ Guidance was developed iteratively which resulted in changes to the format of manifests and the way in which vulnerable passengers and withdrawals from flights were recorded.

3.90 The ANAO reviewed final flight manifests and supporting documents relating to passengers for all 93 government-contracted flights between 22 October 2020 and 29 August 2021. The majority (83 per cent) of final flight manifests followed a consistent format, which included final passenger numbers, as well as the number of Hardship Program recipients, registered Australians assessed by DFAT as vulnerable, and the number of passengers withdrawn. Twenty-three of the 93 final flight manifests did not include the number of vulnerable passengers.

3.91 The ANAO's analysis of data based on flight manifests indicates DFAT booked 15,259 passengers on 93 government-contracted flights which operated between 22 October 2020 and 29 August 2021.¹⁹⁷ DFAT documented 3473 withdrawals across these 93 flights. DFAT maintained an average capacity of over 90 per cent.¹⁹⁸ Additional details are provided in Appendix 9.

3.92 DFAT's delivery of flights was largely appropriate. Flight passenger manifests initially did not support accurate reporting on the number of Australians assisted to return to Australia via contracted flights. DFAT improved the quality of manifests over the course of the pandemic to include the number of vulnerable passengers on each flight.

195 DFAT incorporated a flight offer rejection field in its CCCI database to record flight offer rejections. ANAO observed that this field was blank in 99.8 per cent of cases. Only 103 registrants had any data in this field.

196 Reasons included cancellation, no show of passengers, positive COVID-19 tests or passengers not completing or paying for their booking.

197 Four flights from Los Angeles to Brisbane in January 2021 were contracted by Austrade and not funded under the Qantas agreement.

198 Capacity (the maximum number of passengers for government contracted flights) ranged between 120 and 200 seats at an average of 187 seats.

Flight costs

3.93 DFAT's standing arrangement with Qantas did not specify an upper limit to expenditure. Instead, contracts with Qantas set a limit for each flight, which is the total cost for the flight minus any revenue from ticket sales and freight.¹⁹⁹

3.94 When seeking approval from the government for contracted flights DFAT forecast an average flight cost of \$600,000. The ANAO reviewed expenditure on a total of 150 government-contracted flights that occurred between 22 October 2020 and 24 February 2022. The cost of these flights was \$60,446,269 at 6 June 2022, at an average cost of \$402,975 per flight.²⁰⁰

3.95 The cumulative value of individual contract schedules has been progressively reported on Austender. As of the last date of publication on 3 February 2022, DFAT reported total contract values of \$109 million in facilitated flight contracts with Qantas Airways and \$1.8 million with Singapore Airlines.

Assistance to vulnerable Australians

Overseas Financial Assistance (Hardship) Program

3.96 On 2 September 2020, the government announced the COVID-19 Special Overseas Financial Assistance (Hardship Program) to assist eligible vulnerable Australians overseas with loans and grants for emergency living expenses and airline tickets.²⁰¹

3.97 DFAT developed and implemented appropriate guidelines for the administration of the program including procedures for: assessing the eligibility of applicants; case decision-making and appeals; data entry and record keeping; and debt recovery.

3.98 As at 25 January 2022, DFAT dashboard reporting indicated DFAT had received 10,316 Hardship Program applications. Of these, 5717 had been approved. The ANAO did not observe any material variance between DFAT's reporting and the ANAO's analysis.

3.99 As of 31 December 2021, \$7.42 million in Hardship loans were overdue.²⁰² DFAT's process for recovering overdue loans includes the option for clients to agree to loan repayment plans. At 31 December 2021, there were 624 Hardship recipients with 1069 loans with approved repayment plans, with \$1.02 million recovered. DFAT advised the ANAO that it has taken a compassionate approach to recovery of loans and has prioritised liaising with clients over third-party debt recovery.

199 DFAT was responsible for costs associated with security and passenger facilitation, COVID-19 testing, pre-departure controls and crew positioning costs. Accommodation, meals and transport were required for all contracted flights following the 3–15 May 2021 travel pause.

200 The ANAO's analysis of costs did not include four flights from Los Angeles contracted by Austrade. Total costs for each flight include crew positioning costs and Hardship Program ticket costs.

201 The government approved funding of \$65 million for the Hardship Program on 31 August 2020.

202 Clients are generally given six months to pay back their loan.

Did DFAT engage effectively with overseas Australians in managing the return of Australians?

DFAT was largely effective in engaging with overseas Australians. It provided timely and relevant information to Australians about: travel risks; government assistance; and means of returning to Australia using a range of channels. DFAT's monitoring and evaluation of the effectiveness of its engagement with overseas Australians was limited. While the department responded to a large volume of correspondence from overseas Australians, it does not have appropriate systems and processes to respond to complaints.

3.100 Communication and information sharing with citizens affected by a crisis help to ensure they:

- receive timely and relevant information about unfolding events and potential risks to their safety; and
- understand what actions they can take to help themselves, and what they can expect from government.

3.101 To assess the effectiveness of DFAT's communication with the public, the ANAO reviewed its planning, implementation and evaluation of communication activities.

Communication strategies and channels

Communication strategies

3.102 From March 2020, DFAT implemented strategies for communicating information to the public about its response to COVID-19 and to build and retain trust in the government's response.²⁰³ Communication themes emphasised that DFAT was working 'hard to support Australians throughout this crisis — wherever they are' and 'around the clock to provide [Australians] the information [they] need to stay safe and secure, wherever [they] are in the world'.

3.103 A separate Smartraveller advertising and media campaign was launched in June 2020²⁰⁴, with the objectives of:

- providing timely and relevant information to Australian travellers about COVID-19, travel restrictions and educating them on the risks of overseas travel;
- building greater awareness of the scope and limits of consular assistance; and
- increasing the uptake of Smartraveller resources, including the website, social media and subscription service.

3.104 DFAT advised the government on how it proposed to use its public messaging and communication channels to support the implementation of government decisions. Examples of this are:

203 The strategy stated: 'The primary purpose of our communication efforts is to demonstrate the importance of what DFAT does. We want to increase Australians' positive perception of us through a greater understanding of our role, domestically and internationally'.

204 CCD's Smartraveller communications campaign operated concurrently with whole-of-department strategies. DFAT updated its Smartraveller campaign in September 2020, February 2021 and May 2021. CCD also developed targeted communications plans for specific initiatives, such as the Hardship Program.

- managing public expectations of ‘rescue flights’ after evacuations from Wuhan and Tokyo in early 2020;
- emphasising the ‘integrity of the quarantine system’ following the introduction of caps on quarantine places in July 2020 to counter potential criticisms about delays in being able to enter Australia; and
- timing announcements to manage demand for services.

DFAT communications channels

Smartraveller website

3.105 DFAT’s Smartraveller website provides general and destination specific travel advice for Australian travellers and Australians living abroad. It states that the purpose of Smartraveller is ‘to help Australians travel overseas safely, reduce their risks and avoid problems’.²⁰⁵

3.106 DFAT implemented several timely and appropriate increases to travel advisory levels in early 2020.²⁰⁶ Messaging centred on urging Australians to return to Australia quickly while commercial options were still available.

3.107 The Smartraveller website includes a COVID-19 portal that provides information about assistance available to Australians overseas, including registration, facilitated commercial flights and financial assistance. It also provides information about current COVID-19 measures applying to international travel, such as mandatory quarantine, vaccination and requirements for COVID-19 testing.

3.108 Australian Government policy requires entities to provide information about government services in languages other than English.²⁰⁷ The Smartraveller website provides general advice in seven languages based on research commissioned by DFAT.²⁰⁸ The website does not publish country specific advice, instructions for registering with DFAT or applying for financial assistance in any languages other than English.²⁰⁹ DFAT advised the ANAO that it would be difficult to translate travel advisories due to frequent changes and the risk of providing out of date information.

3.109 In November 2021, DFAT implemented a range of Smartraveller campaign materials to address the easing of restrictions and provide information to assist travellers to manage ongoing health risks associated with pandemic.

205 Department of Foreign Affairs and Trade, *Smartraveller* [Internet], available from <https://www.smartraveller.gov.au/about-us> [accessed 23 October 2021].

206 ‘Do not travel’ advice for China (1 February 2020) and Iran (29 February 2020); increased level change for Japan (23 February 2020) and increased overall levels and parts of South Korea and Italy (February to March 2020); ‘Reconsider your need to travel’ for all countries on 13 March 2020; and ‘Do not travel’ advice for all countries on 18 March 2020. The first lowering of a country’s travel advisory level since 18 March 2020 was a change in advice for New Zealand from ‘Do not travel’ to ‘Exercise a high degree of caution’. On 28 October 2021, the government re-instated country-specific travel advice for all countries.

207 Australian Government, *The Multicultural Access and Equity Policy Guide*, Canberra, 2018, available from <https://www.homeaffairs.gov.au/mca/PDFs/multicultural-access-equity-policy-guide.pdf> [accessed 25 October 2021].

208 Languages are Mandarin and Cantonese (simplified and traditional), Arabic, Thai, Vietnamese and Bahasa Indonesia. The Australian Border Force (Department of Home Affairs) provides key information on border policies, quarantine and other pandemic response measures in 18 languages other than English.

209 DFAT posted Chinese-language summaries of changes to travel advice and announcements by the Prime Minister and Foreign Minister on Chinese social media in the lead up to the Wuhan evacuations.

Use of social media

3.110 An effective use of social media by government is useful to communicating critical information or public warnings quickly and to counter misinformation. DFAT used its approximately 260 social media channels to issue advice and links to key announcements and changes in government policy, and to promote the availability of seats on contracted and scheduled commercial flights.

Emails

3.111 DFAT maintained email channels in its Canberra office and at post for responding to requests for information and assistance from Australians overseas and their families in Australia. In March 2020, posts reported receiving ‘thousands of emails’. DFAT developed standardised response templates to support a consistent approach to responding to emails and providing advice and links to key information.²¹⁰ DFAT does not have a means of recording large volumes of emails or analysing and reporting on client issues raised via email.

Call centre functions

3.112 The Consular Services Charter states that its Consular Emergency Centre (CEC) is available 24 hours a day via telephone or SMS to provide consular assistance to Australians.²¹¹ When call volumes for the CEC increase, DFAT can activate its Emergency Call Unit (ECU) to take overflow calls or respond to specific types of enquiries.²¹²

3.113 The ECU was activated to support evacuations from Wuhan and Tokyo (26 January to 20 February 2020) and the government’s announcement on returning as many Australians as possible by 25 December 2020 (15 October 2020 to 3 February 2021).²¹³ Figure 3.1 shows the volume of calls made to DFAT call centres over the period January 2020 to March 2022.

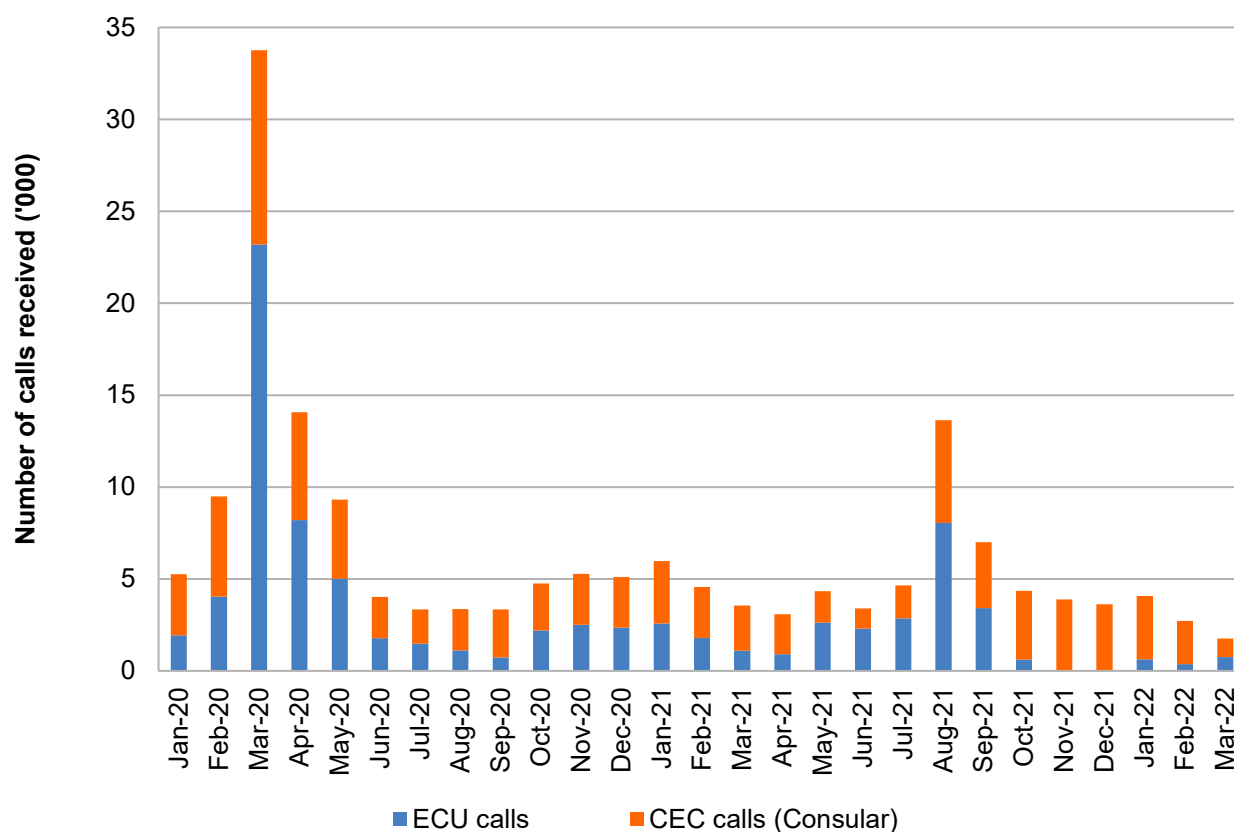
210 Information related to: passports and visa issues; COVID-19 related health advice; flight availability; requirements for returning Australians; and government policy changes including the India travel pause in April 2021.

211 The CEC carries out a range of consular and passport support functions, which may include the initial management of complex consular cases. It is also the after-hours first point of official and public contact with DFAT, enabling responses to time critical events. As well as managing calls, it manages mailboxes, monitors cables and may provide early information about an emerging crisis.

212 The ECU can have up to 26 operators. In the event that the volume of telephone call exceeds the capacity of the ECU, DFAT may call on a Memorandum of Understanding with Services Australia to activate additional operator services.

213 DFAT also activated its ECU following the large explosion in Lebanon in August 2020 and in response to events in Afghanistan in August 2021 and Ukraine in 2022.

Figure 3.1: DFAT's reporting on calls received: CEC and ECU call volume by month (January 2020–March 2022)^{a b}



Note a: The increase in calls in August 2021 was due to DFAT's response to events in Afghanistan.

Note b: The chart shows consular related calls and excludes passports or agency and staff related calls to the CEC.

Source: ANAO analysis of call centre statistics and telephony system reports.

Monitoring and evaluation of communications activities

3.114 DFAT has monitored its social media and online engagement activities throughout the pandemic and prepared internal reports with statistics on public engagement and views expressed about its services. Reports tracked key themes in public reaction to travel bans, safe travel zones, vaccinations and quarantine arrangements. Some monitoring reports included recommendations for the next week or two.

3.115 DFAT commissioned an evaluation of its COVID-19 crisis communications covering the period from May 2020 to February 2021. The evaluation focussed on Australians planning to travel rather than Australians already overseas. When evaluating its communications DFAT should also seek the views of overseas Australians to ensure messaging is effective in reaching and informing both audiences.

3.116 The Australian Government's *Information Management Standard* states entities should retain information relating to interaction with clients and information used to report on entity

performance.²¹⁴ DFAT's telephony system enables DFAT to generate statistical call reporting based on raw data for a maximum of 12 months.²¹⁵ As such, data sourced directly from the telephony system was not available for analysis for the period January 2020 to 31 August 2020. DFAT recorded key figures from these reports in a tracking spreadsheet.

3.117 While DFAT has appropriate procedural guidelines for the administration of its call centre functions, it has not established an approach to assessing whether its handling of calls is satisfactory. This would require it to set and monitor performance standards.²¹⁶ For the ECU, this may also include consideration of how more complex consular cases are handled during a crisis.

3.118 DFAT does not always record the countries or locations from which calls are made or whether callers are those directly affected by a crisis, family members or others.²¹⁷ This reduces the potential for information to be collected which adds to DFAT's understanding of how a crisis is unfolding, and who and how many people may be affected.

Recommendation no. 7

3.119 DFAT capture and retain accurate and complete data from its engagement with clients in accordance with government information management standards, and for the purposes of monitoring its effectiveness in engaging with the public.

Department of Foreign Affairs and Trade response: *Agreed.*

3.120 *ANAO found that DFAT is largely effective in engaging with overseas Australians. We provided timely and relevant information to Australians about travel risks; government assistance; and means of returning to Australia using a range of channels. Nonetheless, DFAT is strengthening its data capability. Also refer to response to Recommendation 3.*

Management of consular complaints

3.121 The Commonwealth Ombudsman *Better Practice Complaint Handling Guide* states that Australian Public Service agencies 'must deliver high quality programs and services to the Australian community'. To respond to client dissatisfaction, entities require a strong complaint handling

214 National Archives of Australia, *Information Management Standard for Australian Government* [Internet], NAA, Canberra, 2022, available from <https://www.naa.gov.au/information-management/information-management-standards/information-management-standard-australian-government> [accessed 4 November 2021].

215 DFAT generated call statistics on a monthly basis and saved these to its main document management system. Statistical reports cannot be verified as the raw data underlying these reports is not maintained.

216 The ANAO analysed reports extracted from DFAT's telephony system from 1 September 2020 to 31 December 2021. Reports included data on calls answered, average, maximum and minimum call time and call wait time, and abandoned calls. In the absence of performance standards, it is not possible to determine from this data whether satisfactory performance has been achieved.

217 DFAT advised the ANAO that it captures the details of calls to the CEC relating to individuals registered with DFAT in the context of events in Afghanistan and Ukraine.

model, underpinned by staff commitment, effective systems and processes to manage complaints, and regular analysis and reporting to inform improvements to services.²¹⁸

3.122 For consular matters, DFAT offers several communication channels which can be accessed via the Smartraveller and Consular Services Charter webpages, as well as social media.²¹⁹ Complaints may also be referred from the Foreign Minister's Office and members of parliament.

3.123 DFAT does not have a department-wide complaints management policy and process. Consular staff are expected to follow complaints handling guidelines set out in DFAT's Consular Handbook. This provides an overview of processes for managing complaints, but does not include, or link to complete instructions on how Canberra-based and post staff are to respond to and resolve complaints.²²⁰

3.124 From 2004 to 2020, DFAT used a spreadsheet for recording complaints. This was not maintained beyond the recording of eight entries from January 2020 to May 2020 referencing COVID-19.

3.125 In April 2020, DFAT established a COVID-19 inbox and a correspondence team to manage emails from the public and other entities.²²¹ Standard operating procedures approved in October 2021 for the management of correspondence do not address the handling of complaints. DFAT provided standard information about registering with DFAT and assistance available. DFAT is unable to track work activity or report on the number, type or volume of complaints received outside those captured in its Parliamentary Document Management System (PDMS).²²²

3.126 Not all correspondence indicating client dissatisfaction may be appropriate for DFAT to accept as a complaint.²²³ DFAT requires clear criteria for the acceptance of or referral of complaints. Once a complaint is accepted, DFAT should apply the principle of proportionality to determine the

218 Commonwealth Ombudsman, *Better Practice Complaint Handling Guide* [Internet], Commonwealth Ombudsman, Canberra, pp. 4–5, 7, 10, 23, 33, available from https://www.ombudsman.gov.au/data/assets/pdf_file/0019/112276/Better-Practice-Guide-FINAL-v6-A2111312.pdf [accessed 14 June 2022].

219 Communication channels include DFAT's Smartraveller and passport websites, email inboxes, social media, telephone helplines and in-person consular services at posts.

220 The Commonwealth Ombudsman's *Better Practice Complaints Handling Guide* sets out eight principles for the effective management of complaints including that complaints should be recorded in an electronic system and be supported by clear procedural guidance. See Commonwealth Ombudsman, *Better Practice Complaint Handling Guide* [Internet], p. 10.

221 The Consular Response COVID-19 inbox receives emails from a number of sources including: the Foreign Minister's Office and members of parliament; the public; other government entities; and DFAT business areas.

222 Correspondence managed through the parliamentary workflow system is able to be tracked and reported. In response to this audit, DFAT reviewed a sample of complaints in its PDMS system received in March and April 2020. Of 201 items of correspondence, 18 were categorised as complaints about DFAT's provision of consular service.

223 The Commonwealth Ombudsman defines a complaint as 'an implied or express statement of dissatisfaction where a response is sought, reasonable to expect or legally required'. See Commonwealth Ombudsman, *Better Practice Complaint Handling Guide* [Internet], p. 5.

amount of time and resources to be dedicated to each complaint.²²⁴ This would help ensure consistency in the review and handling of correspondence and reduce the risk of serious citizen complaints being overlooked.

3.127 DFAT has not established standard processes for complaints handling across its overseas network of posts.²²⁵ It cannot report on the total number of complaints received and whether these were appropriately managed or identify common themes in complaints. The scope for DFAT to address systemic problems on the basis of information obtained through complaints and improve the delivery of consular services is limited.²²⁶

3.128 In November 2021, DFAT undertook a lessons learned exercise which identified opportunities to improve the management of consular complaints. DFAT should ensure that, where applicable, lessons are incorporated into DFAT's whole-of-department approach to complaints handling.

224 Effectively and efficiently managing resources requires entities to decide 'whether (a complaint) will be dealt with and if so by whom, how quickly it will be dealt with, the priority and resources it will be given, the appropriateness of the outcome achieved'. See New South Wales Ombudsman, *Managing Unreasonable Conduct by a Complainant* [Internet], NSW Ombudsman, Sydney, 2021, pp. 8–9, available from https://www.ombo.nsw.gov.au/_data/assets/pdf_file/0004/3568/Managing-unreasonable-conduct-by-a-complainant-manual.pdf [accessed 14 March 2022]. Also refer to Auditor-General Report No.37 2017–18 *Australian Broadcasting Corporation—Complaints Management*, pp. 22, 24–25.

225 The ANAO examined DFAT's delivery of consular services in 2001 and reported on its implementation of recommendations in 2003. The 2003 follow-up audit found DFAT had not implemented Recommendation 4 directed at addressing its lack of systematic records of consular complaints received across the consular service network and reporting of these to Canberra. It also identified there were no guidelines to assist staff in handling complaints. See Auditor-General Report No.31 2000–2001 *Administration of Consular Services*, pp. 2, 22, 86; and Auditor-General Report No.16 2003–4 *Administration of Consular Services Follow-Up Audit*, p. 73.

226 In 2015, the ANAO found that while DFAT collected client feedback it did not analyse or use this for process improvement purposes or public reporting on consular services performance. Auditor-General Report No.21 2014–15 *Delivery of Australia's Consular Services*, p. 120. This issue had also been identified in the Auditor-General's 2003 report. *Ibid.*, p. 87.

Recommendation no. 8

3.129 DFAT establish a complaints handling model that enables it to appropriately manage consular complaints across the department, during periods of standard operations and crisis, in accordance with Commonwealth requirements and better practice principles.

Department of Foreign Affairs and Trade response: *Agreed.*

3.130 *The department has established processes in place to respond to, or refer as appropriate, feedback which does not relate to DFAT's actions or decisions. Following the unprecedented volume of correspondence received during the height of the pandemic, Consular and Crisis Management Division is implementing an improved feedback handling model. DFAT notes consular feedback received is of a varied nature, not limited to complaints about the actions and decisions of DFAT.*

ANAO comment on Department of Foreign Affairs and Trade response

3.131 DFAT was unable to advise the ANAO on the number or type of complaints it received over the course of the pandemic (see paragraphs 3.125 and 3.127). The audit identified that DFAT does not have an enterprise-wide approach to managing complaints, and the Consular and Crisis Management Division does not have oversight responsibility for the handling of complaints by posts, often the first or only point of contact for Australians overseas. Relevant recommendations of previous ANAO audits have not been implemented (see paragraph 3.127 and footnotes 225–226).

Did DFAT's arrangements for returning overseas Australians support the achievement of the government's objectives?

DFAT data and reporting indicate it did not meet all of the government's objectives. The ANAO could not verify DFAT reporting on: the number of Australians and vulnerable Australians it assisted to return to Australia; and Australians who accessed facilitated commercial flights administered by DFAT. Reporting could not be verified due to data quality issues and unclear methods underpinning its reporting on Australians registered with DFAT.

3.132 As discussed at paragraph 1.23, the government set DFAT the goal of returning Australians registered on or before 18 September 2020 by 25 December 2020. To assess whether DFAT met the government's goal, the ANAO reviewed relevant DFAT data, its planning and reporting to the government and the Parliament.

3.133 The ANAO's assessment of data applied benchmarks established for performance data by the PGPA Rule.²²⁷ These state that performance measures must use sources of information and methodologies that are reliable and verifiable.

Register of Australians overseas

3.134 At the beginning of the pandemic in January 2020, posts registered Australians using a number of spreadsheets. In April 2020, DFAT implemented the Traveller Registration System (TRS). The TRS is a portal supported at the backend by the COVID-19 Crisis Citizen Information (CCCI) system. This was used for registering and monitoring Australians overseas seeking to return to Australia.

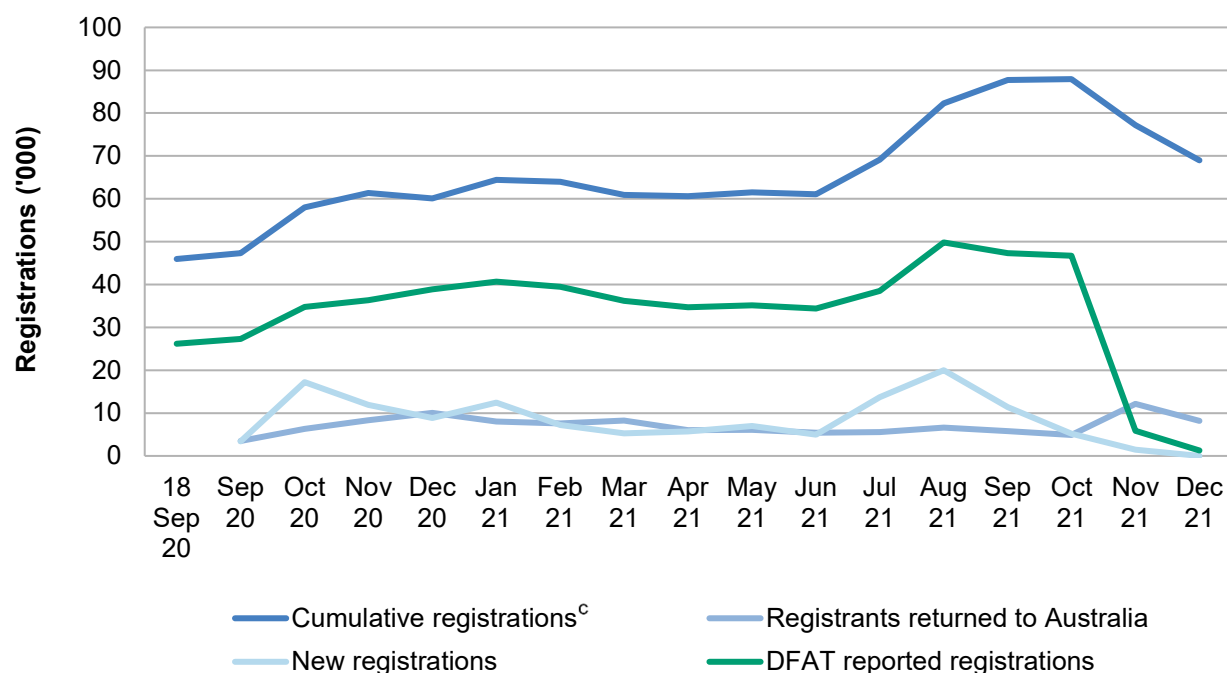
3.135 The TRS is an online portal on the Smartraveller website where overseas Australians could register their details and update personal information. The CCCI database records individual registrant details and supports reporting on the status of returning Australians.

3.136 When registering, registrants were advised to register if they were currently overseas and had been trying to return home and had not been able to. They were advised to not register if they were overseas, 'but don't want to return to Australia; aren't planning to return just yet; don't need help returning; or if they are in Australia and planning to travel in the future'.

3.137 By 20 January 2022, a total of 206,119 Australians had registered with DFAT for assistance to return, with an average of 8479 new registrations each month from 18 September 2020. Figure 3.2 shows that the number of registrants seeking to return to Australia increased from 18 September 2020 to October 2021, and that there were more monthly new registrations than monthly arrivals in Australia.

227 Subsection 16EA(b) of the PGPA Rule. Reliable and verifiable are defined using their ordinary meanings. Reliable may be defined as 'able to be relied on; trustworthy', and verifiable may be defined as 'able to be proven as true, as by evidence or testimony; able to be confirmed or substantiated'. See Department of Finance, *Developing Good Performance Information* [Internet], Finance, Canberra, 2022, available from https://www.finance.gov.au/sites/default/files/2020-05/RMG%20131%20-%20Developing%20good%20performance%20information_0.pdf [accessed 14 March 2022].

Figure 3.2: Cumulative registrations, new registrations, DFAT reporting and monthly arrivals (18 September 2020–31 December 2021)^{a b}



Note a: ANAO analysis is subject to the data quality issues detailed in Appendix 8.

Note b: ANAO analysed CCCI data to 20 January 2022 and DFAT dashboard reports to 25 January 2022.

Note c: Cumulative registrations are the number of registrants outside Australia at the end of each month plus the number of new registrations, minus the number of registrants returned to Australia in that month.

Source: ANAO analysis of data provided by DFAT.

3.138 On 22 October 2021, the government agreed to review the cohort of registered Australians to clarify their eligibility to: access facilitated flights; their intention to return to Australia; and the timeframe in which they intend to travel. The government agreed that this would be done by emailing registrants and making adjustments to registrations when a registrant failed to respond or refused more than five flight offers.

3.139 The ANAO reviewed manual and automated TRS and CCCI system controls relating to systems access, systems oversight and assurance and data validation. Weaknesses were identified in relation to: conformance with user access requirements; oversight over the modification of data; and the verification of data, including key date fields. See Appendix 8 for more detail on systems assurance and data quality findings.

3.140 With the easing of travel restrictions on 1 November 2021, the government approved the closure of the registration system for new registrations. The approval noted DFAT's decision to change the registration status of 20,253 registrants to 'no longer seeking to return' on the basis that they had not accessed their registration in the previous six months.

3.141 The government also agreed to retain in the registration system only those who confirmed they were: unvaccinated; unable to access a vaccine approved by the Therapeutic Goods Administration; or unable to access a commercial flight. DFAT did not adequately document its methods for adjusting data in its registration system. The ANAO was unable to verify that changes were made in accordance with the criteria agreed by the government.

Return of Australians registered as at 18 September 2020 by Christmas 2020

3.142 DFAT established an internal taskforce specifically to work toward returning as many Australians before Christmas as possible, prioritising those registered as vulnerable.²²⁸

3.143 DFAT developed several forecasts and plans for returning Australians before 25 December 2020, ranging from 14,284 (2 October 2020) to between 21,000 and 24,000 (11 November 2020). DFAT's November 2020 plan set out that forecasts depended on the states and territories making sufficient quarantine capacity available.²²⁹

3.144 CCCI data indicates that as of 18 September 2020, there were a total of 45,931 registrations. Figure 3.3 shows that on 25 September 2020 DFAT reported to the government that there were 26,200 Australians registered to return to Australia as at 18 September 2020.²³⁰ Reporting to government did not explain that the total number of registrants recorded in the CCCI system was greater than the number DFAT considered to be actively seeking to return to Australia.

3.145 In November 2020, DFAT began reporting on the number of Australians registered to return to Australia based on the number of registrants who had expressed a preference to return in a specific quarter, rather than the total number of registrants.²³¹ DFAT data indicates that of those registered to return to Australia on or before 18 September 2020, a total of 12,432 returned to Australia between 18 September and 25 December 2020. As at 31 December 2021, DFAT data indicated it had assisted 20,428 of those registered on or before 18 September 2020 to return to Australia.

228 DFAT advised the ANAO that before the government's announcement, the return of Australians by this date had not been discussed with the government.

229 Arrangements established to manage quarantine capacity through the use of caps on arrivals in Australia is discussed in detail in Auditor-General Report No.12 2020–21 *Management of International Travel Restrictions during COVID-19*, paragraphs 3.66–71. The government's decision in October 2020 to increase quarantine capacity through the use of the Howard Springs quarantine capacity is discussed at paragraph 2.116 of this audit.

230 DFAT's reporting to the government on 25 September 2020 (the first report following the government's announcement on 18 September 2020 and before the commencement of flights on 22 October 2020) did not explain the methodology used to determine total registration numbers. DFAT advised the ANAO that its reporting on registered Australians was based on those who had expressed a preference to return to Australia (DFAT did not seek preferences from registered Australians on the quarter in which they preferred to return until November 2020, due to lower than anticipated uptake from flight offers). DFAT's reported figure excluded registrants who had not expressed a preference to return to Australia. The ANAO, using DFAT's methodology, could not verify DFAT's reported figure of 26,200.

231 In July 2021, DFAT commenced including figures on those with an interest in returning in the following quarter (July reports included those interested in returning in quarter four 2021).

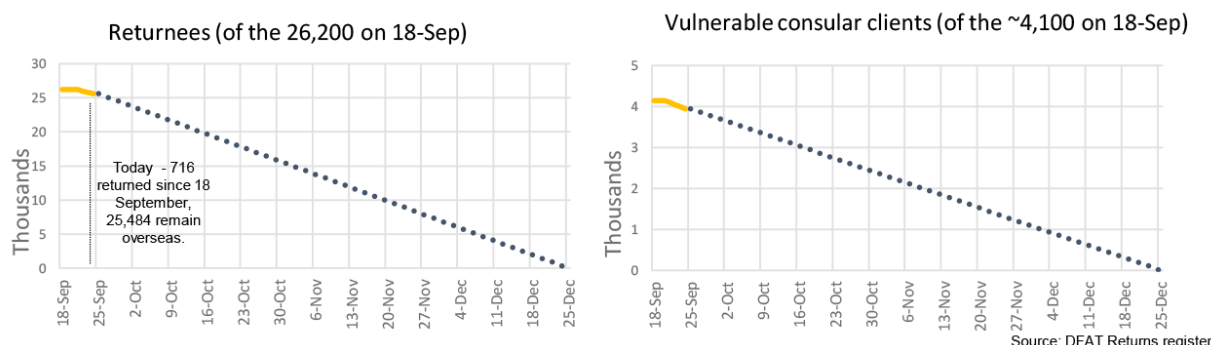
Figure 3.3: DFAT report to the government on 25 September 2020^a

Australians registered to return

Target: To offer all Australians who registered with DFAT on or before 18 September an opportunity to return to Australia by Christmas.

Total registrations:	27,292 (est. ~ 4,580 vulnerable)
Registered as at 18 September:	26,200 (est. ~ 4,100 vulnerable)
Returned on commercial flights:	[data to be added when flights commence]
Offered a Gov't facilitated flight:	[data to be added when flights commence]
Returned on Gov't facilitated commercial flights	[data to be added when flights commence]
Returned on other flight types	[data to be added when flights commence]
Last 7 days returned (15/9 to 22/9):	716 (awaiting further data from ABF on vulnerable cohort subset)
Remaining overseas (as of 22/9):	25,484

In order to return this cohort by Christmas, an average of **1,871 Australians** of those registered by 18 September need to return each week.



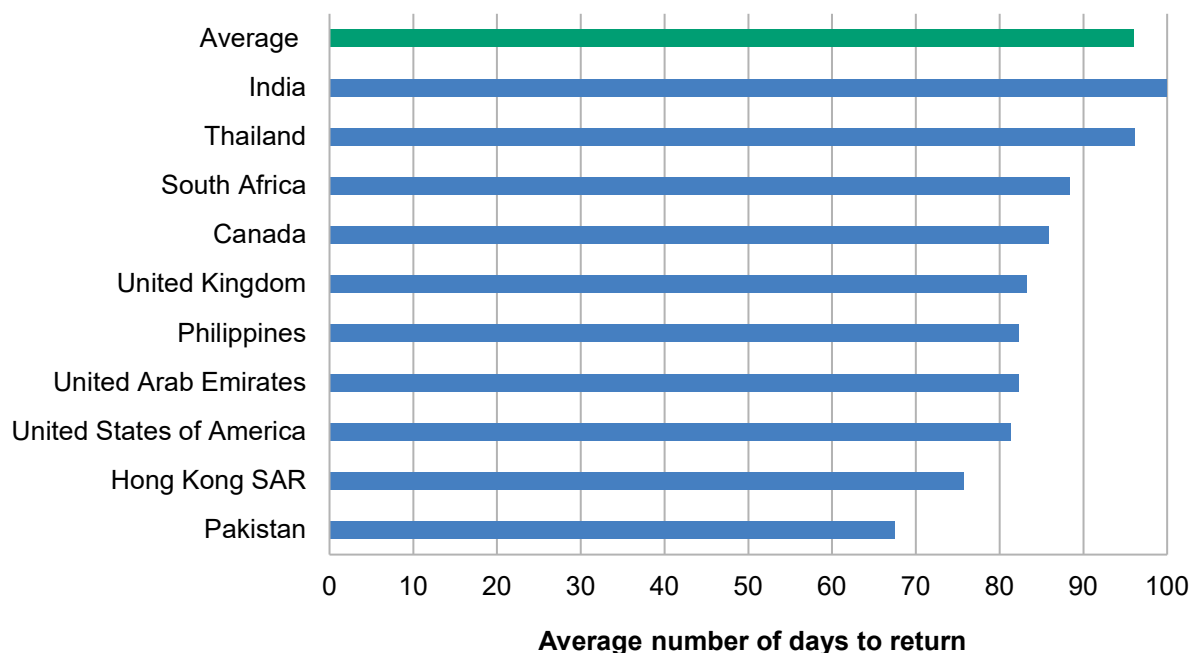
Note a: FCFs commenced under the Qantas contract with dedicated budget funding on 22 October 2020. Dashboard reports before this date indicated that flights data would be included after the commencement of flights.

Source: Screenshot of DFAT's report to government.

Time taken to return to Australia

3.146 ANAO analysis found that, on average, people registered on or before 18 September 2020 remained registered for 96 days before returning to Australia, compared with 82 days for those who registered after 18 September. The figure excludes registrants assessed as vulnerable by DFAT (see paragraph 3.149). Figure 3.4 shows the average days to return from the top ten countries where overseas Australians were registered.

Figure 3.4: Average days from registration to arrival in Australia by country (for registrations on or before 18 September 2020)^{a b}



Note a: Average figure and count of returns excluded registrants with a return date occurring before the date of registration.

Note b: Figure includes top ten countries where Australians were registered.

Source: ANAO analysis of data provided by DFAT.

Prioritisation of vulnerable Australians

3.147 On 1 October 2020, the Prime Minister directed DFAT during a teleconference to return 90 per cent of the vulnerable cohort by the end of October 2020. DFAT's October 2020 plan forecast the return of 89 per cent of the 4100 vulnerable Australians DFAT reported as registered on 18 September 2020.

3.148 ANAO analysis of DFAT data found that as at 18 September 2020:

- there were 3701 registered Australians identified as vulnerable;
- a total of 1029 vulnerable Australians (28 per cent of the total number) were supported to return between 18 September 2020 and 31 October 2020; and
- 82 per cent of those identified by DFAT as vulnerable on or before 18 September 2020 were assisted to return to Australia by 31 December 2021.²³²

3.149 ANAO analysis of DFAT data found that it took on average 125 days for vulnerable Australians registered on or before 18 September to return to Australia, and 95 days for vulnerable Australians registered after 18 September.

²³² This figure includes the 28 per cent of vulnerable people returned by 31 October 2021.

Reporting on the return of Australians

3.150 DFAT produced point-in-time dashboard reports on the status of returned Australians, as well as the Hardship Program, which it used as a basis for reporting to the government and the Parliament.²³³ As at 22 January 2022, DFAT had reported to the government that:

- 131,180 Australians registered with DFAT had returned to Australia since March 2020, including 19,294 vulnerable Australians;
- DFAT had helped to support the return of 61,741 Australians since March 2020; and
- DFAT had supported 23,943 Australians to access facilitated commercial flights since 22 October 2020, including 6995 vulnerable Australians.

3.151 The ANAO tested the quality and completeness of CCCI data and re-calculated figures reported to the government to verify the accuracy of reporting at different points during the pandemic. It reviewed dashboard reports (based on CCCI data) between September 2020 when the first reports were developed through to December 2021.

3.152 The ANAO identified weaknesses in the recording, validation and maintenance of CCCI data. Reporting could not be verified in relation to: the total number of registrants; the number of Australians assisted on DFAT facilitated commercial flights; the number of vulnerable Australians assisted by DFAT; and the number of Australians assisted to return before 25 December 2020.²³⁴ Further detail is provided at Appendix 8 and Appendix 9.

3.153 DFAT made iterative changes to its CCCI database throughout the pandemic to improve the quality of data and system functionality. Changes include improvements to: better track flight offers; correspondence with registrants; identify duplicate entries; and the quality of data in key fields (for example, the passport field). Despite this, CCCI system oversight arrangements require further strengthening. See Appendix 8 for additional findings on DFAT systems controls.²³⁵

233 DFAT advised the ANAO that dashboard reports were updated and distributed generally twice a week. Reports included figures on the: number of Australians registered to return; the number returned; registered Australians returned with the assistance of DFAT; and the number of returns on facilitated commercial flights after 22 October 2020.

234 ANAO figures represent the maximum number of registrants based on the fields DFAT used to record return dates and the system generated date the record was created. DFAT's reporting stated 'registered Australians' and, as such, the ANAO did not exclude people on the basis of when they had expressed a desire to return.

235 System controls are IT controls that protect the security and integrity of a database. Examples of controls are measures to prevent unauthorised access, ensure adequate backup of data, and maintain the integrity of the data in the database.

Recommendation no. 9

3.154 DFAT develop, implement and routinely test a fit-for-purpose crisis registration system that sufficiently validates registrant data to support business planning, program evaluation and reporting.

Department of Foreign Affairs and Trade response: *Disagreed.*

3.155 *In April 2020, DFAT launched a new crisis registration system in response to the COVID-19 pandemic. This system was adapted and enhanced as the department's consular response evolved. The value of this system was demonstrated during the Ukraine crisis. DFAT will continue to routinely test this fit-for-purpose system. This system is being considered in the development of Consular and Crisis Management Division's Data Strategy.*

ANAO comment on Department of Foreign Affairs and Trade response

3.156 The audit found that the system implemented in April 2020 has material deficiencies (see paragraph 3.150–3.151 and Appendix 8). Without remedial action, DFAT is likely to continue to experience problems in maintaining appropriate records and generating reliable reports for government.

Provision of other consular assistance

3.157 DFAT's Business Continuity Pandemic Plan (March 2020) set out that it would continue services for Australians, including emergency consular assistance, passport services, and by maintaining capability to respond to other crises.

3.158 During the period 1 January 2020 to 17 January 2021, DFAT recorded the provision of 48,145 consular assistance services to overseas Australians and eligible permanent residents, including 15,411 services reported in DFAT's Consular State of Play report for 2020–21.²³⁶ Services included 19,146 crisis cases related to DFAT's Hardship program and 3036 Hardship debt recovery cases. See Appendix 10 for additional information on consular assistance provided by DFAT.

236 Department of Foreign Affairs and Trade, *The 2020–21 Consular State of Play* [Internet], DFAT, Canberra, 2021, p. 2, available from <https://www.smartraveller.gov.au/news-and-updates/2020-21-consular-state-play> [accessed 17 February 2022].

3.159 More than half of all consular activities were provided in ten countries with 6510 (14 per cent) cases provided in Afghanistan. ANAO was not able to verify the accuracy and reliability of DFAT's reporting due to incomplete and inaccurate data.²³⁷



Grant Hehir
Auditor-General

Canberra ACT
21 June 2022

237 'Complete' is defined in the ordinary sense of the word. If specific fields (of a case or registration entry) are relevant to the purpose of reporting, and these fields are blank or do not contain relevant detail, then the data set is incomplete. This affects the accuracy of the reports generated using the data set.
'Reliable' means that data is verifiable, that is, able to be confirmed or substantiated. Reliable data supports a consistent assessment of performance.

Appendices

Appendix 1 Entity response



Australian Government
Department of Foreign Affairs and Trade

**Kathryn Campbell AO CSC and Bar
Secretary**

Ref: EC22-001563

Mr Grant Hehir
Auditor-General
Australian National Audit Office
PO Box 707
CANBERRA ACT 2601

Dear Mr Hehir

I have received the Australian National Audit Office's (ANAO's) revised report *Overseas Crisis Management and Response: The Effectiveness of the Department of Foreign Affairs and Trade's (DFAT) Management of the Return of Overseas Australians in Response to the COVID-19 Pandemic*. I thank the ANAO for its consideration of DFAT's response to the draft report.

The scale of the COVID-19 pandemic was unprecedented. DFAT instigated its largest and most complex consular response in its history. The department has assisted 61,755 Australians to return home and facilitated 227 flights since the start of the pandemic in 2020. Many DFAT staff provided this assistance while in countries with infection rates far greater than in Australia, during lengthy restrictive lockdowns and while separated from immediate family. Our effective response would not have been possible without the dedication of these staff.

As with any crisis, there are lessons to learn, including some highlighted by the ANAO's proposed report. However, there are aspects of this report that weaken its strategic value to DFAT or which could be read as a mischaracterisation or limited view of the department's response. These aspects, further addressed below, detract from the report's value in highlighting the key lessons of this crisis for DFAT and government more broadly.

For example, the ANAO's framing of recommendations as depicting a department without established crisis management frameworks, as several recommendations suggest, and its assertions that DFAT has not met its obligations to government, are inaccurate.⁶ In fact, that the department was able to return so many Australians, sustain regular reporting to government and manage concurrent events (such as the unprecedented Afghanistan evacuation), speaks to the effectiveness and adaptability of our systems in a crisis.

R G Casey Building, Barton ACT 0221 www.dfat.gov.au

The report has mischaracterised the scope of DFAT's objectives in focusing on one element of its broader response to the pandemic, namely the goal to return Australians over the period of 18 September 2020 to 25 December 2020. Even by this limited test, the department performed well. At that time, 26,200 Australians were registered with DFAT as seeking to return to Australia; by Christmas, more than 24,800 registered Australians were helped to do so. Of course, DFAT's work preceded and extended well beyond this three-month window, in the more than two-year long pandemic.

The ANAO report could have done more to acknowledge some of the difficulties faced by the department during its response. As you know, the pandemic was a time of unpredictable international and domestic border closures, incoming passenger caps, and inconsistent state and territory managed quarantine arrangements. Many of these factors worked against the department's efforts to return as many Australians as possible, yet the report understates these impacts, which were clearly beyond the department's control.

Nonetheless, I agree that it is important DFAT reflect on the lessons from this extraordinary pandemic, as we would with any other crisis. I am grateful for the ANAO's efforts to highlight some of these important lessons, building on the department's existing systems and processes to improve crisis response.

Some of the tasks identified in the report are already underway. The department began enhancing its crisis response systems in mid-2020, before the audit. DFAT's Consular Modernisation Program has improved consular and crisis management. Further work is under way, focused on digitising and enhancing our services, including data capabilities, ensuring they are targeted and aligned with whole-of-government service delivery standards.

With existing programs underway to modernise the way we operate, I am confident the department will continue to deliver high quality consular and crisis management services to the Australian public.

Please find enclosed DFAT's responses to recommendations in Attachment A, the entity response to the audit in Attachment B and editorial comments in Attachment C.

I would be very happy to meet with you to discuss the report and how we can ensure the important lessons are captured for the future.

Yours sincerely



3 June 2022

ANAO comment on Department of Foreign Affairs and Trade response

- (a) The ANAO's finding in this report that DFAT did not meet the government's objectives for returning overseas Australians is based on the available evidence. The ANAO could not verify DFAT's reporting on the number of Australians and vulnerable Australians it assisted to return home. The ANAO's comments on DFAT's responses to the report's recommendations are at the relevant paragraphs of this report.

Appendix 2 Improvements observed by the ANAO

1. The existence of independent external audit and the accompanying potential for scrutiny improves performance. Improvements in administrative and management practices usually occur: in anticipation of ANAO audit activity; during an audit engagement; as interim findings are made; and/or after the audit has been completed and formal findings are communicated.

2. The Joint Committee of Public Accounts and Audit 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. In this context, the below actions were observed by the ANAO during the course of the audit. It is not clear whether these actions and/or the timing of these actions were planned in response to proposed or actual audit activity. The ANAO has not sought to obtain assurance over the source of these actions or whether they have been appropriately implemented. References to relevant paragraphs in the audit report are provided below.

- DFAT conducted a lessons learned exercise on complaints handling in November 2021. Key recommendations included improvements to data collection, analysis and reporting on statistics and trends to senior leadership to help inform policy development and improve service delivery. Observations and recommendations align with those made by the audit (paragraphs 3.128–3.129);
- DFAT reviewed its application of paragraph 2.6 of the CPRs in November 2021 (paragraph 3.62); and
- The audit team observed that the maintenance of records improved over the course of the audit (paragraphs 2.48–2.54).

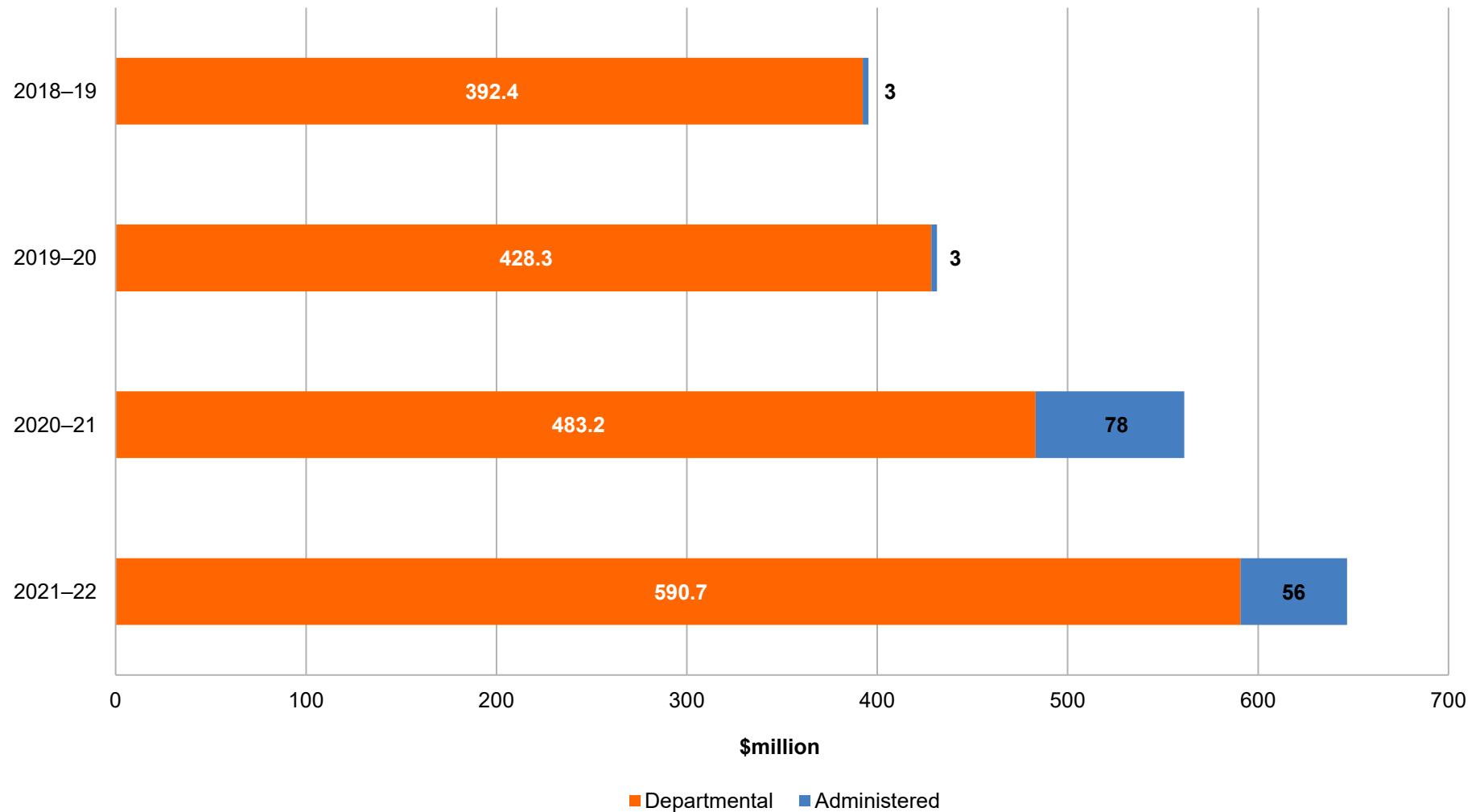
5. DFAT advised the ANAO that in response to the ANAO's audit activity or observations made by the audit that it is:

- undertaking work to define its preparedness policies, including processes for setting expectations of timeliness and sustaining levels of effort in crisis response linked to assessments of risk (paragraphs 2.22–2.29); and
- developing a policy framework for the provision of services to citizens during a crisis (paragraphs 2.13–2.18).

6. DFAT advised the ANAO that it was undertaking the following activities to improve its crisis management capability which align with the findings of this audit report:

- DFAT is reviewing measures, targets, methodologies and data sources used to evaluate and report on the department's performance, including through its annual report. New performance information is being prepared for inclusion in the Portfolio Budget Statements 2023–24 (paragraphs 2.80–2.83);
- documenting a process for regular review and exercising of the department's pandemic plan (paragraph 2.12);
- documenting its crisis management framework, including how constituent parts operate together as a system (paragraphs 2.13–2.29, 2.45–2.47);
- consolidating its approach to managing Crisis Action Plans (CAP) and certifications to facilitate central oversight of assurance processes and activities. This includes amending the CAP certification template to capture more compliance and activation points. The updated template will include reference to the requirement for completion of a comprehensive review within a two-year period. Posts will be required to fully test and validate identified risks and assumptions. The CAP is intended to remain a 'live' document which is updated to also capture emerging risks, as required (paragraphs 2.71–2.95);
- implementing a systematic, multi-year risk assessment process to identify posts with the greatest need for additional support and assurance and instituting a regular regime of review of all crisis management functions (paragraphs 2.117–2.126);
- strengthen its engagement with 'like-minded countries' to develop formal preparedness performance metrics and compare data and identify trends (paragraphs 2.24–2.29, 2.66, 2.96–2.99);
- improving its tracking and reporting of the implementation of improvements identified through lessons learned (paragraphs 2.67–2.69);
- establishing more systematic approaches to gathering, reporting and assuring data relevant to government decision-making (paragraphs 2.48–2.54, 3.39–3.40);
- investigating translation options to allow for quick translation of key messages including during a crisis (paragraph 3.108);
- conducting a formal review to address shortfalls in consular feedback mechanisms (paragraphs 3.121–3.128);
- implementing human resource suggestions made by the audit report which align with measures previously identified through its existing reform agenda (paragraphs 3.46–3.53);
- improving telephony and reporting capability by implementing a telephony system that will allow for improved analysis and review of the handling of calls (to be operational by mid-2022) (paragraphs 3.112–3.118); and
- establishing a new crisis registration system (activated in January 2022) to improve the quality of consular assistance data (paragraphs 3.134–3.141).

Appendix 3 DFAT consular services funding allocations 2018–19 to 2021–22



Source: ANAO analysis of publicly available budget information.

Appendix 4 Top ten locations of registered Australians — November 2020

Country	Registered Australians (total)	Registered Australians (per cent)	COVID-19 cases (cumulative) ^a	COVID-19 cases (per cent)
India	9622	27	8,507,754	17
United Kingdom	5372	15	1,171,445	2
United States	1506	4	9,636,579	19
Philippines	1403	4	393,961	1
Thailand	1180	3	3837	<0
Canada	1055	3	255,809	1
South Africa	1000	3	735,906	1
Pakistan	775	2	341,753	1
Vietnam	639	2	1213	<0
United Arab Emirates	750	2	141,032	<0
Top ten locations	23,302	66	21,189,289	43
Other countries	12,261	34	28,538,027	57

Note a: Cumulative COVID-19 cases are based on figures provided by the World Health Organization (WHO), as of 8 November 2020. See World Health Organization, *COVID-19 Weekly Epidemiological Update — 10 November 2020* [Internet], WHO, Geneva, 2020, available from <https://apps.who.int/iris/bitstream/handle/10665/336585/nCoV-weekly-sitrep08Nov20-eng.pdf?sequence=3&isAllowed=y> [accessed 22 October 2020].

Source: ANAO analysis of data provided by DFAT and publicly available information from the World Health Organization.

Appendix 5 Timeline of key events

Date	Description
2020	
2 January	A cable from Shanghai post reports a cluster of pneumonia cases in Wuhan, China.
4 January	The World Health Organisation (WHO) alerts all country governments through the International Health Regulations (IHR, 2005) Event Information System [Note — IHRs are a legally binding instrument agreed by WHO Member States, designed to facilitate information sharing.
21 January	Travel advice for Wuhan raised from Level 1 to 2 — 'Exercise a high degree of caution'.
23 January	Travel advice for Wuhan raised to Level 3 — 'Reconsider your need to travel'.
24 January	Travel advice for Hubei, China, raised to Level 4 — 'Do not travel'.
28 January	Travel advice overall for China raised to Level 3 — 'Reconsider your need to travel' (Hubei remained at Level 4 — 'Do not travel').
30 January	The Director-General of WHO declares that the global outbreak of COVID-19 constitutes a Public Health Emergency of International Concern.
1 February	The Australian Government raises the travel advice to the highest level — Level 4 'Do Not Travel' for all of mainland China.
3, 9 February	Assisted departure flights from Wuhan.
19 February	DFAT evacuates 164 passengers from the Diamond Princess cruise ship which departs Tokyo for Australia.
23 February	Travel advice for Japan and South Korea overall raised to Level 2 — 'Exercise a high degree of caution'.
29 February	Travel advice for Iran raised to Level 4 — 'Do not travel'.
13 March	Travel advice for all Level 1 and 2 countries raised to Level 3 — 'Reconsider your need to travel'.
16 March	The Australian Government issues restrictions on international cruise ship arrivals.
17 March	DFAT recommends Australians overseas return as soon as possible by commercial means.
18 March	The Australian Government raises the advice for all overseas travel to Level 4 — 'Do not travel' — 'We also now advise Australians who are overseas who wish to return to Australia, to do so as soon as possible by commercial means. Commercial options may quickly become limited'. ^a
25 March	The government strongly urges Australians overseas who want to return to do so as soon as possible.
26 March–29 April	DFAT arranges facilitated flights from Peru, Argentina, South Africa and Nepal. It also evacuates 127 Australians from Uruguay, including passengers from the Ocean Atlantic cruise ship.

Date	Description
3 April	The government establishes an agreement with Qantas and Virgin airlines to maintain a network of four key international hubs — London, Los Angeles, Hong Kong and Auckland — to support commercial flights for four weeks (International Aviation Network).
10 July	National cabinet agrees on incoming passenger caps.
2 September	The government announces it will provide additional support to the most vulnerable Australian citizens. The Hardship Program is announced.
18 September	Following a request from the Deputy Prime Minister to Premiers and Chief Ministers on 16 September, national cabinet agrees to increase the availability of quarantine places to enable a greater number of Australians to return. Prime Minister states that the government would seek to return overseas Australians by Christmas.
21 September	The government directs the standing up of a taskforce to bring back Australians registered with DFAT (as at 18 September) by Christmas 2020.
13 October	DFAT and Qantas enter into a Head Agreement for flight services for 12 months.
16 October	DFAT announces its intention to facilitate eight commercial flights from the United Kingdom, India and South Africa.
20 October	The Australian Government enters an agreement with the Northern Territory Government to establish the Centre for National Resilience at Howard Springs to increase quarantine capacity to 500 individuals a fortnight at Howard Springs.
11 November	DFAT develops a plan for 22 flights to return Australians through a mix of facilitated flights and scheduled commercial flights.
2021	
16 January	Government announces it will support a further 20 facilitated commercial flights.
5 February	The Australian Government requests the Northern Territory Government to increase quarantine capacity at its Howard Springs quarantine facility.
22 February	The agreement for Howard Springs is varied to increase capacity to 2000 individuals a fortnight.
30 March	DFAT signs variation 1 to extend the Head Agreement with Qantas for the provision of flight services.
9 April	DFAT contracts Qantas to deliver 16 flights.
11 May	The Australian Government commits funding in the May 2021 Budget to facilitate more than 100 flights to bring Australians home from overseas. ^b
3–15 May	A temporary pause is placed on flights from India.
2 July	States reduce passenger caps from 14 July to 31 August. Use of Howard Springs is increased.
28 October	The government removed the global 'Do not travel' advice for all destinations with none set lower than Level 2 — 'Exercise a high degree of caution'.

Date	Description
1 November	Fully vaccinated Australians permitted to travel overseas.
21 November	DFAT closes COVID-19 registration portal (CCCI) to new registrations. Quarantine-free travel arrangements commence with Singapore.
1 December	Australian international borders reopened to fully vaccinated eligible visa holders (including skilled and student, humanitarian and working holiday makers).
2022	
21 February	Australian international borders reopened to include fully vaccinated visa holders (tourists, business travellers and other visitors).

Note a: S Morrison, (Prime Minister), 'Update on coronavirus measures' [Internet], media statement, Canberra, 18 March 2020, available from <https://www.pm.gov.au/media/update-coronavirus-measures> [accessed 16 February 2022].

Note b: Australian Government, *Budget Measures: Budget Paper No. 2: 2021–22*, Commonwealth of Australia, Canberra, 2021, p. 107.

Source: ANAO analysis of DFAT information and publicly available information.

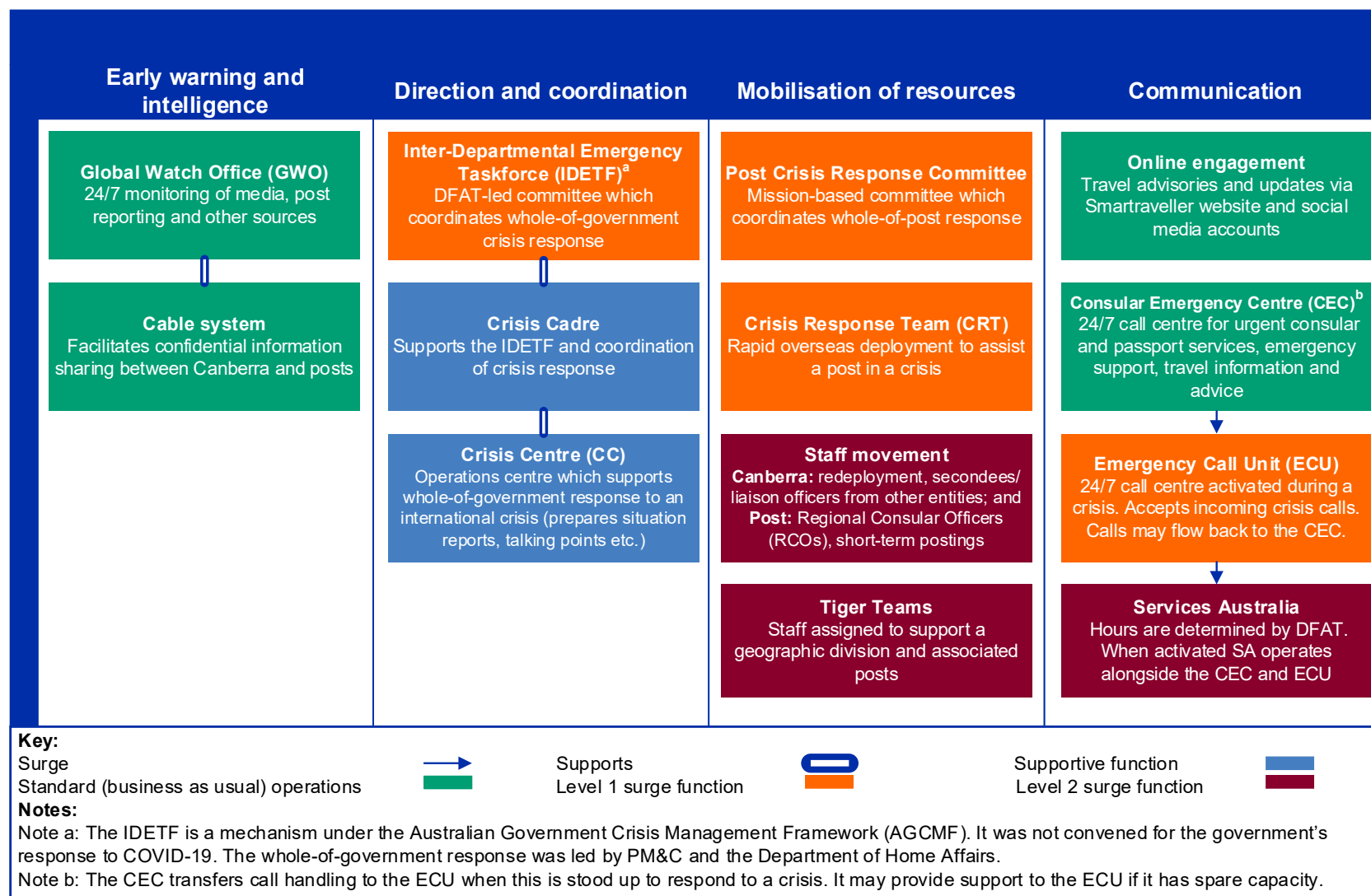
Appendix 6 DFAT COVID-19 post risk dashboard with indicators

# Staff welfare (safety and security)		# Maintenance of service delivery and operations	
1	Country COVID-19 case High daily increase of COVID-19 cases and/or unmanaged COVID-19 cases in host country	4	Travel restrictions Travel restrictions prevent posts from receiving essential support services and increase the consular load.
1.1	Qualitative assessment of spread	4.1	Qualitative assessment of travel restrictions at post
1.2	Confirmed cases per million (country level)	5	Controls Host country controls (restrictions on mass gatherings, venue closures, school closures) impede post's ability to deliver services.
1.3	Daily change in confirmed cases (country level)	5.1	Qualitative assessment of school closing (country level)
1.4	Fatality rate (country level)	5.2	Qualitative assessment of workplace closing (country level)
2	Medivac risk Inability to medivac staff out of the host country, includes an assessment of the host country's healthcare system and capacity to manage cases	5.3	Qualitative assessment of public event restrictions (country level)
2.1	Qualitative assessment of ability to medivac at post	5.4	Qualitative assessment of public transport restrictions (country level)
2.2	Qualitative assessment of health system capacity (pre-crisis)	5.5	Qualitative assessment of restrictions on internal movement (country level)
2.3	Qualitative assessment of health system capacity (current)	6	Consular service delivery Heightened consular caseload places strain on post's ability to deliver services.
3	Civil unrest Heightened risk of civil disorder or crime in the host country due to COVID-19 conditions	6.1	Percentage change in consular cases at post
3.1	Assessed residual risk of civil disorder related security risks	6.2	Number of Australians registered with post (country level)
3.2	Assessed residual risk of crime related security risks	6.3	Number of Australians wanting to return to Australia (country level)

# Staff welfare (safety and security)	# Maintenance of service delivery and operations
N/A	7 Staff capacity Remaining A-based staff are unable to manage an increased workload.
	7.1 Percentage of DFAT A-based staff at post
	7.2 Percentage of attached-agency staff at post
	7.3 Percentage of dependents at post
	8 Post COVID-19 cases An increase in COVID-19 cases at post (staff and dependents) reduces staff capacity and impacts the physical operating environment.
	8.1 Confirmed COVID-19 cases at post
	8.2 Suspected COVID-19 cases at post
	9 Impact on post operations Local conditions impede posts' ability to carry out functions
	9.1 Staff impact
	9.2 Public impact

Source: ANAO analysis of data provided by DFAT.

Appendix 7 DFAT's activation of surge mechanisms



Source: ANAO analysis of data provided by DFAT.

Appendix 8 CCCI data quality and completeness

Table A.1: Data quality and completeness

Data field name	Description	Findings
Date creation/date returned to Australia	Fields that capture the date of registration and the date of arrival in Australia.	A total of 6033 registrations had an arrival date that was earlier than the registration creation date. This indicates the account was created after the person had returned to Australia.
Chartered flight priority	Priority of traveller for a chartered or facilitated flight.	DFAT did not use this field.
Additional information (free text field)	DFAT should not update this field. The field is for the traveller to enter information that can assist to further explain their circumstances. This field is intended to be used when determining vulnerability.	ANAO identified 2555 standardised responses in this field. This may indicate this field was updated by DFAT using standardised inputs or registrants had shared key words and phrases.
Vulnerability field (free text field)	Information on any concerns raised by the traveller, including health and medications, access to money, food and accommodation, movement restrictions, or problems with visas.	There are 3747 entries with the master vulnerable tag '18-Sep-2020'. Of these entries, 3332 (89 per cent) contained a blank or blank equivalent. There are 16,286 entries with the vulnerable tag '18-Sep-2020' or 'Post 18 September 2020'. Of these entries, at least 14,093 (87 per cent) contain a blank or blank equivalent entry. A total of 31 entries included the term 'elderly' with the youngest of these 69 years old. ANAO identified a total of 9295 registrants aged over 69 years. Of these, only 26 per cent were assessed as vulnerable.
Post additional information (free text field)	Comments section used by DFAT posts to enter information relating to the traveller and their situation.	This field was blank for 160,090 of 198,947 (80 per cent) of all registrations and 46 per cent of vulnerable registrants.
Last attempted contact	Date of last attempted contact with client.	198,938 (99.99 per cent) blank.
Last successful contact	Date of last contact with client.	198,924 (99.99 per cent) blank.
Vaccination status	Vaccination status	ANAO observed 67,732 entries with no arrival in Australia date. Of these, there are 7759 entries with a recorded vaccination status. There are 59,973 blank entries or 88 per cent of travellers yet to return with no recorded vaccination status.

Data field name	Description	Findings
Number of declined flights	The numerical count of chartered flight offers a traveller has declined (due to various reasons).	ANAO observed 67,732 entries with no arrival in Australia date. Of these, there are 67,629 entries with no recorded instance of declined flights (99.8 per cent). There are 80 instances of one declined flight and 23 instances of two declined flights.
Citizen detail closed date	The date the registration status was closed.	Of the 206,119 total entries assessed by the ANAO, 181,105 (87.8 per cent) contain a date the status was set to closed. Of the entries which have been closed, 111,742 were closed on 30 November 2021, 25,780 were closed on 14 December 2021 and 19,117 were closed on 9 December 2021. This accounts for 162,639 (89.8 per cent) of the closures.

Source: ANAO analysis of data provided by DFAT.

Table A.2: Manual and automated systems control findings

System control	Purpose	Findings
User access controls	Ensure only authorised users are accessing the system and modifying registrant details and reporting parameters.	DFAT has not complied with its user access approval processes or sufficiently documented approvals.
Data assurance and oversight processes	Ensure that the deletion or modification of registrant data is approved and the reasons are documented.	DFAT does not have sufficient oversight over the modification of records from CCCI.
System monitoring	Records of changes to registrant data including creation, deletion and modification are monitored for unauthorised changes.	DFAT maintains a log of key processes such as deletion, creation and modification of registrant records. The log is not sufficiently monitored by DFAT, increasing risks to data integrity.
Data validation	Ensures key data fields contain reliable and accurate data.	Important data fields such as date fields are not validated impacting the accuracy and reliability of DFAT's reporting on returning Australians. For example, the ANAO identified 6033 registrations with a return to Australia date that was earlier than the registration creation date.

Source: ANAO analysis of TRS and CCCI systems controls.

Appendix 9 Contracted flights data and reporting

Table A.3: Flight statistics: 20 October 2020 to 29 August 2021 (93 flights)

Country	No flights	Hardship passengers	Vulnerable passengers ^a	Total passengers	Percentage vulnerable ^b	Withdrawn ^c
Vancouver	1	11	55	137	48	26
Paris	1	1	17	149	12	66
Frankfurt	9	16	414	1580	27	390
Chennai	6	46	11	1040	5	190
New Delhi	37	419	929	6325	21	1131
Denpasar	1	17	139	186	84	48
Johannesburg	3	23	277	519	58	111
Istanbul	3	10	66	476	16	204
London	27	224	1909	4566	47	1248
Los Angeles ^d	5	2	27	295	10	60
Total	93	755	3733	15259	29 (average)	3473

Note a: 16 of 31 flights between 20 October 2020 and 7 February 2021 did not include the number of vulnerable passengers.

Note b: Calculation of the percentage of vulnerable passengers includes Hardship passengers and those registered Australians identified by DFAT as vulnerable.

Note c: Withdrawn figures include cancellations, passengers who did not complete their bookings, COVID-19 positive passengers and those who did not check-in for the flight.

Note d: Four flights from Los Angeles were contracted by Austrade.

Source: ANAO analysis of final passenger manifests.

Table A.4: Reporting on returning Australians — ANAO analysis and findings^a

Reported measure	DFAT report date(s)	DFAT reported figure	ANAO analysis and findings
Number registered (registered to return to Australia) ^b	25 September 2020 (first dashboard developed)	27,292 total registrations (26,200 registered on 18 September 2020).	ANAO analysis found that there were 45,958 people registered as of 18 September 2020.
Returns on Government facilitated flights (since 22 October 2020)	29 October 2020–27 August 2021	344 on 29 October 2020 15,879 on 27 August 2021.	Could not verify reporting due to inconsistencies between the reported figures and the figures recorded in final flight manifests. Variance between ANAO findings and DFAT reporting ranged from between six and 20 per cent.

Reported measure	DFAT report date(s)	DFAT reported figure	ANAO analysis and findings
Vulnerable returns on government facilitated flights (since 22 October 2020)	29 October 2020–27 August 2021	286 on 29 October 2020 5598 on 27 August 2021.	Could not verify against final flight manifests. Variance between ANAO findings and DFAT's reporting ranged from between 21 and 59 per cent.
Australians assisted to return (since 1 March 2020)	All reporting	61,741 Australians since March 2020 on 22 January 2022.	Could not be verified due to inconsistencies between flights data and source documents including flight manifests and flight contracts for facilitated flights. ^c
Total arrivals from 18 September 2020	All reporting	On 30 December 2020, DFAT reported that 24,872 were returned to Australia between 18 September 2020 and 30 December 2020.	ANAO could not verify accuracy of reporting due to data quality issues.

Note a: ANAO findings are subject to data quality issues identified in Appendix 8.

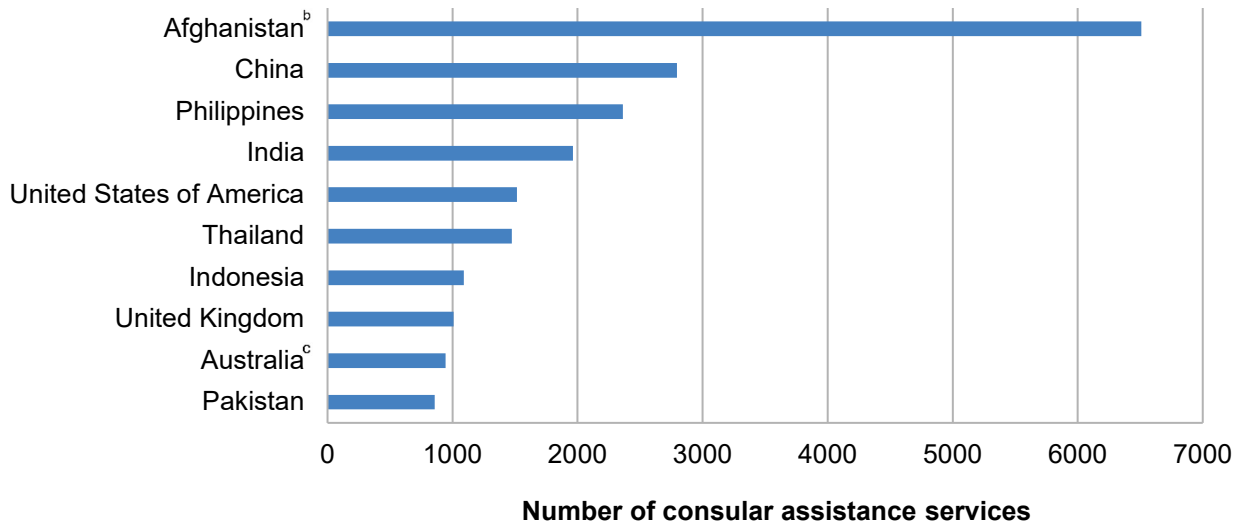
Note b: DFAT's initial dashboard reporting on 25 September 2020 stated 'total registrations' and did not provide caveats or statements on exclusions from DFAT's reported figure. The ANAO did not exclude any registrations in its calculations. ANAO figures represent the maximum number of registrations.

Note c: DFAT advised that the ability to capture flight data in CCCI was developed in the latter half of 2021.

Source: ANAO analysis of DFAT data and dashboard reports.

Appendix 10 Consular assistance analysis and data quality findings

Figure A.1: Top 10 countries for consular assistance services (1 January 2020–17 January 2022)^a



Note a: This figure includes 1726 cases created prior to 1 January 2020 that were still receiving support from DFAT and therefore active cases as of 1 January 2020.

Note b: Ninety-eight per cent of consular assistance cases located in Afghanistan were created in August and September 2021.

Note c: Cases located in Australia were incorrectly recorded in the consular assistance database.

Source: ANAO analysis of DFAT's consular assistance data.

Table A.5: Consular assistance data quality findings

Data field name	Description	Findings
Country	Country where the consular assistance service was provided.	A total of 943 services were incorrectly recorded as being provided in Australia.
Sub Type ^a	127 sub-categories of consular assistance. Includes 45 COVID-19 related.	Sub-categories were not recorded for 16,321 of 37,403 cases between 1 January 2020 and 17 January 2022 (51 per cent). These fields were blank.
Closed on	Date the case was closed	There are 37 examples of a case being closed without a closed date.
Australian passport number ^b	Australian passport number	A total of 9778 (26 per cent) were blank entries and 5092 (14 per cent) were duplicate passport entries.

Note a: DFAT advised the ANAO that it has some case types that do not require a sub type.

Note b: DFAT advised the ANAO that 'Australian passport number' is not a mandatory field.

Source: ANAO analysis of consular assistance data.