



Queensland Audit Office  
*better public services*

# Government advertising

**Report 16: 2016–17**



Queensland Audit Office

Location Level 14, 53 Albert Street, Brisbane Qld 4000

PO Box 15396, City East Qld 4002

Telephone (07) 3149 6000

Email [qao@qao.qld.gov.au](mailto:qao@qao.qld.gov.au)

Online [www.qao.qld.gov.au](http://www.qao.qld.gov.au)



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May 2017

The Honourable P Wellington MP  
Speaker of the Legislative Assembly  
Parliament House  
BRISBANE QLD 4000

Dear Mr Speaker

**Report to Parliament**

This report is prepared under Part 3 Division 3 of the *Auditor-General Act 2009*, and is titled *Government advertising* (Report 16: 2016–17).

In accordance with s.67 of the Act, would you please arrange for the report to be tabled in the Legislative Assembly.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Anthony Close', is positioned above the printed name.

Anthony Close  
Auditor-General (acting)



# Contents

<b>Summary .....</b>	<b>1</b>
Introduction.....	1
Audit conclusions.....	3
Audit findings .....	4
Recommendations.....	7
Reference to comments.....	8
Report structure.....	8
Report cost .....	8
<b>1. Context .....</b>	<b>9</b>
Types of campaign advertising and communication activities .....	9
Relevant legislation.....	10
Roles and responsibilities .....	11
The committee’s approval process .....	14
Purchasing advertising and communication services .....	16
<b>2. Administering and approving advertising .....</b>	<b>19</b>
Introduction.....	20
Audit conclusions.....	20
Applying the committee approval process .....	21
Use of creative materials on social media .....	25
<b>3. Reporting advertising expenditure .....</b>	<b>27</b>
Introduction.....	28
Audit conclusions.....	28
Whole-of-government reporting .....	28
Department data .....	33
<b>4. Assessing effectiveness and compliance .....</b>	<b>37</b>
Introduction.....	38
Audit conclusions.....	40
Evaluating campaign effectiveness.....	40
Preparing and obtaining approval for campaigns .....	50
<b>Appendix A—Full responses from agencies .....</b>	<b>53</b>
<b>Appendix B—Audit objectives and methods.....</b>	<b>69</b>
<b>Appendix C—Queensland Government Advertising Code of Conduct .....</b>	<b>73</b>
<b>Appendix D—Who does the Code apply to? .....</b>	<b>74</b>
<b>Appendix E—Campaigns assessed in detail.....</b>	<b>75</b>



# Summary

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## Introduction

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Organisations use advertising to communicate messages to target audiences. These audiences can be quite broad or very specific. To reach them, the organisations may choose to use television, print or online advertising. They may also decide to run campaigns, which means using a collection of advertising activities to communicate consistent messages.

Public sector entities use advertising and communication activities to convey messages to the public about:

- the rollout of new policies and programs
- items of public interest—such as work, health, and safety issues
- other critical community information—such as preparing for storm season.

For example, the 2014 *Moments that matter* advertising campaign, paid for by the Queensland Government, conveyed a positive message to the public about health and safety when at work. This was a public interest campaign. It was run across the state, and was supported by promotions targeted to different work groups.

Advertising and communication activities that form part of a campaign share a single theme—raising the public's awareness, interest or feelings about a message the government wishes to convey. It can be a powerful way to impact on public opinion.

Consequently, it is important that public sector entities manage their advertising and communication activities well. Because advertising has the potential to influence people, the entities must use it appropriately. They must also ensure that it is not perceived as political advertising. Messages that are seen to be intended to affect public opinion about the political party in government (rather than about the government services being delivered) have the potential to diminish:

- the value of the messages being conveyed
- the effectiveness of the expenditure
- public perception of the legitimacy of the advertising campaign.

To mitigate this risk and ensure government advertising is managed well, the government has put in place a governance framework to assess and approve advertising and communication activities.

## Queensland Government Advertising Code of Conduct

The *Queensland Government Advertising Code of Conduct* (the Code) sets out the principles that the 21 state government departments (listed in Appendix D) are to abide by in developing and producing advertising material. These principles include the requirement to:

- identify a direct and obvious benefit to the people of Queensland
- use objective language, and remain impartial and free of political argument
- not redirect funding that has been allocated to the delivery of services.

Other Queensland public sector entities like statutory bodies, universities and government owned corporations are encouraged to abide by the Code's principles but are not required to.

## Roles and responsibilities

Under the *Financial Accountability Act 2009*, accountable officers are to achieve reasonable value for money in the operations of their department or statutory body. This includes money spent on government advertising and communication activities. They are also responsible for adhering to the Code and for complying with the approval process administered by the Government Advertising and Communication Committee (the committee), which was set up by the Department of the Premier and Cabinet (DPC) in 2013.

Since 29 November 2016, the committee has consisted of four representatives from the DPC, a departmental representative (from one of the other Queensland Government departments, on a rotational basis), and a representative from the Office of the Premier.

The role of the committee is to:

- manage a whole-of-government communication and advertising plan
- make decisions about the appropriateness of individual departmental activity—including what they spend on media
- coordinate whole-of-government departmental advertising and communication activities to ensure
  - they are aligned with the government's strategic priorities
  - linkages are considered between campaigns and government priorities to identify similar or conflicting communication messages
  - risks and challenges in activities proceeding or not proceeding are identified
- identify missed opportunities in departmental advertising where government priorities have not been communicated, and recommend if activity is required.

Committee processes are in place to ensure that Queensland Government departments plan, develop, implement, fund, and evaluate campaign advertising and communication activities. DPC provides a secretariat role for the committee. The committee endorses whole-of-government processes for approving advertising and communication by departments and administers the contracts for campaign and non-campaign services on behalf of all Queensland public sector entities.

As part of their campaigns, Queensland public sector entities pay to place advertisements in the market (for example, on television, in magazines or on billboards). They purchase these advertising placements through the master media buying agency (the agent who negotiates the price and place of advertisements). They have spent \$193 million on campaign advertising placement in the last three financial years (2013–14 to 2015–16). This amount includes the cost of placing advertisements but does not include the cost of planning, creating or evaluating a campaign. DPC reports annually on the portion that the 21 departments spend under the master media buying arrangement.

## Government advertising approval process

The committee's terms of reference states that it will:

- provide good governance
- align communication to government priorities
- provide value for money
- ensure a coordinated approach
- confirm departments' advertising adheres to the Code and other relevant communication policies, including confirming that it is funded out of an appropriate source (that is, not money designated for service delivery).



The process involves the committee reviewing and approving the following five advertising stages:

Stage 1—the annual advertising plan

Stage 2—the rationale for the campaign

Stage 3—the creative concept proposal

Stage 4—the final creative materials

Stage 5—the evaluation.

### Audit objective and scope

The objectives of the audit were to assess the economy of government purchasing of advertising, the effectiveness of a selection of government advertising campaigns, and the administration of applicable governance frameworks.

The scope of the audit included 21 departments, with an emphasis on the following departments:

- the Department of the Premier and Cabinet—for their role in administration and policy
- the Department of Health, Department of Transport and Main Roads, and Queensland Treasury—for a selection of campaigns we assessed in detail, including the
  - Childhood immunisation campaign
  - *Let's change the way we look at speed* campaign
  - First Home Owners' Grant campaign.

This audit focuses on the master media buying arrangement for campaign services. We did not examine the non-campaign arrangement in relation to expenditure on advertising and communications.

### Audit conclusions

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DPC's governance framework for Queensland Government advertising and communication activities has been designed to achieve most of its objectives. However, in practice, the committee that assesses agencies—both against the Code and in terms of value for money in advertising—lacks sufficient information on which to base these assessments consistently.

The ability of the committee to achieve its terms of reference is limited by three gaps in its scope:

- committee guidelines do not cover emerging technologies and communication channels (such as social media advertising)
- it is only mandatory for the 21 departments to comply with the Code despite other public sector entities using public funds for advertising
- DPC publicly reports less than 50 per cent of the total public sector advertising expenditure.

These gaps negatively impact on the committee's whole-of-government objectives, and the consistency and transparency of messaging of government advertising and communication activities.

DPC's public reporting of the 21 departments' annual expenditure on advertising placement, despite no formal requirement to do so, enhances transparency and accountability. DPC's reporting could be further enhanced by including total expenditure of:

- all public sector entities that access the master media buying arrangement (rather than just the 21 departments)
- all campaign advertising costs, rather than excluding the costs associated with, for example, campaign design and evaluation.

This would align the Queensland Government with better practice, as demonstrated by some other Australian jurisdictions.

The committee set up to review and approve advertising would benefit from more diverse membership. Given the high weighting of DPC staff on the committee, when DPC requires approval for its own advertising, there is potential for conflicts of interest (perceived or real).

Both the committee and departments could be more effective in applying the advertising review and approval process. For example, departments are asked to confirm their campaigns' compliance with the Code before the creative aspects of the campaigns have been designed. This timing issue limits the committee's ability to test alignment with the Code.

Two of the three campaigns we examined in detail had effectively met their short-term objectives in terms of audiences reached and key messages recalled. However, both campaigns also had long-term program level objectives to change the public's behaviours, beyond awareness. It is important that these departments continue to evaluate the effectiveness of their campaigns' contribution to these long-term program objectives over time.

Formal reporting to the committee of campaign results against all objectives and the cost-effectiveness of the different types of advertising media they used, would improve accountability and provide learnings to the benefit of future campaigns.

Departments would also benefit greatly if DPC provided sufficient guidance, definitions and better practice examples to help them comply with its processes.

## Audit findings

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### Overseeing Queensland Government advertising

It is only mandatory for the 21 departments to adhere to the Code, but all Queensland public sector entities have access to the master media buying arrangement to conduct campaigns. Collectively, Queensland public sector entities spent \$193 million on campaign advertising placement in the last three financial years. Approximately half of this was spent by the 21 departments.

Statutory bodies including universities, technical and further education (TAFE) institutions, and other Queensland public sector entities account for the rest of the expenditure. We acknowledge that each of these have their own governing body responsible for reviewing and approving the appropriateness of campaigns and budgets. We also acknowledge it is not necessary or appropriate for all public sector entities, particularly commercialised entities, to align messages.

However, this means DPC does not have visibility of government advertising at a whole-of-government level to achieve its terms of reference objectives.

### Compliance with the Government Advertising and Communication Committee approval process

DPC has structured the committee as an independent advertising review and approval body. However, four of six representatives on the committee are DPC employees, raising the potential for conflict of interest when DPC's own advertising needs to be approved.

Departments are required to submit major campaigns to the committee for approval and minor campaigns to DPC for noting. The committee approval process states that campaigns must not be split into segments to avoid being classified as major and therefore subject to the committee's approval. Departments must not place advertisements or use creative materials designed for the campaign on social media prior to receiving the committee's approval.

Despite these rules, Queensland Treasury split its First Home Owners' Grant campaign into two campaigns to get its major campaign in the market quickly. As a result, it undertook advertising in the marketplace prior to receiving committee approval.

When Queensland Treasury first submitted its campaign to the committee in May 2016, it did not receive approval to proceed. The committee supported the campaign in principle; however, it questioned the amount of expenditure, noting that it would be one of the highest spending campaigns for the 2015–16 financial year if it went ahead.

Queensland Treasury then split the campaign into segments to advertise earlier. It developed creative material specifically to run an early First Home Owners' Grant campaign on paid radio and digital media while continuing to plan, develop and implement another campaign. The early campaign cost \$137 708.

There are no repercussions for departments when they do not comply with the committee approval process or the Code.

### Compliance with the Code

Each department ticks a box to confirm compliance with the Code in their submission to the committee. But they do so at an impractical point of the approval process—stage 2, which is when they outline the rationale for the campaign. This means departments and the committee are required to confirm that the campaign is compliant before the creative materials are developed.

Since our audit, one department has implemented formal confirmation procedures at an appropriate time in the campaign creation process.

### Public reporting of advertising expenditure

DPC publicly reports annually on expenditure on advertising placement by the 21 departments, despite no formal requirement to do so. This is consistent with some other Australian jurisdictions. By including advertising placement only, DPC reports around 55 per cent of departments' total expenditure on campaign advertising. It does not include, for example, the departments' engagement of agencies for the development, monitoring and evaluation of campaign advertising.

DPC does not have rigorous quality assurance practices over the information it reports publicly on expenditure for advertising placement. It does not obtain adequate assurance over the amounts spent on advertising placement before reporting these amounts on its website and on the government's Open Data portal (which provides online access to government data).

In addition, DPC only reports on those Queensland public sector entities covered by the Code. These account for less than half of the Queensland public sector's expenditure on advertising placement. Other jurisdictions include the expenditure of statutory bodies, government owned corporations, and other public sector entities in their advertising reports.

### Providing guidelines and supporting departments

DPC has developed guidelines, templates and forms to support departments in complying with the Code and committee processes. However, departments advised us that they need clarity about definitions and more examples of better practice to assist them in effectively developing, implementing and evaluating campaign advertising and communication activities.

For example, DPC's policy and guidance material does not include clear definitions for campaign advertising and communication activities. This creates difficulty for departments in consistently applying the requirements.

Also, they provide no guidance on, or monitoring of, the use of campaign advertising and communication activities on departments' own social media sites.

### Evaluating campaign effectiveness

The Code's first principle is that for government advertising, 'there must be a direct and obvious benefit to the people of Queensland.' Two of the three departments we examined in detail were able to adequately justify the need for their communication activities. One did not confirm that advertising was the most effective way to educate the public.

Some departments are undertaking analysis of the effectiveness of their campaigns in meeting short-term goals (for example, audience reach, or message recall). However, the campaigns we assessed in detail were part of broader education programs with long-term objectives to change the public's behaviour. These departments reported to us that they plan to assess the long-term objectives as part of their overall program evaluations to determine if behaviours change over time.

Formal evaluation reports against the original communication plan, including cost-effectiveness of advertising mediums and lessons learned, are not being completed. These reports would improve the assessment of campaigns and provide insights for future advertising and communication activities.

One department has implemented an evaluation report template which will facilitate this type of analysis in the future.

### Achieving value for money

DPC, as manager of the standing offer arrangements for buying advertising placements for campaigns, aims to ensure value for money for all Queensland public sector entities. It assesses the cost of campaigns by assessing performance of the master media buying agency and can demonstrate that the rates the Queensland public sector entities are obtaining from negotiation on their behalf are better than market rates. But none of the stages in the approval process for government advertising enable the committee to assess whether the department has achieved value for money. That is, that the department is satisfied with the quality and the results they have achieved for the public funds invested.

In addition, a risk exists that purchased advertising placements don't occur. This is because DPC's current method of checking that departments get what they paid for is insufficient. Independent sources do not provide sufficient verification.

There is also no way for the committee to determine the funding source of each department's proposed advertising. This limits the committee's ability to fulfil its objective of ensuring that money designated for service delivery is not redirected towards advertising and communications.

## Recommendations

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We recommend that the Department of the Premier and Cabinet:

1. diversifies the membership of the Government Advertising and Communication Committee to strengthen its independence. (Chapter 2)
2. assesses the merits of extending the Government Advertising and Communication Committee's scope for 'noting' other public sector entities' expenditure on advertising to include those public sector entities that are not required to comply with the *Queensland Government Advertising Code of Conduct*. (Chapter 3)
3. strengthens its oversight of government advertising and communication activities by
  - developing guidance to assist agencies with planning, developing, implementing, evaluating, and funding campaign advertising and communication activities. (Chapter 2)
  - updating policies to reflect the Government Advertising and Communication Committee approval process. (Chapter 2)
  - updating the approval stages to ensure that compliance with the *Queensland Government Advertising Code of Conduct* is assessed after the final creative materials have been completed. (Chapter 4)
  - analysing and confirming the appropriateness of quality assurance reports for advertising placement activities. (Chapter 3)
4. enhances public reporting of total expenditure on advertising and communication activities on campaigns by including
  - all public sector entities' expenditure on campaign advertising placement. (Chapter 3)
  - (for the 21 departments) all campaign costs associated with research and evaluation, production of creative materials, advertising placement, and other related items and services, in addition to expenditure on advertising placement. (Chapter 3).

We recommend that departments:

5. strengthen the evaluation of communication activities by preparing formal reports post campaigns which summarise results, cost-effectiveness of advertising mediums and insights into how the results inform future campaigns. (Chapter 4)
6. ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the relevant authority (Director-General or equivalent) as compliant with the *Queensland Government Advertising Code of Conduct*, and that evidence of this certification is included in submissions. (Chapter 4)

## Reference to comments

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In accordance with section 64 of the *Auditor-General Act 2009*, we provided a copy of this report to the 21 departments for comment.

The Department of the Premier and Cabinet coordinated a whole-of-government response. In addition, responses were received from:

- the Department of Transport and Main Roads
- the Department of Environment and Heritage Protection
- the Department of Education
- the Department of Justice and Attorney-General
- Queensland Treasury
- the Department of Health.

Their responses are in Appendix A.

## Report structure

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Chapter	
Chapter 1	provides the background to the audit and the context needed to understand the audit findings and conclusions.
Chapter 2	evaluates how well the Department of the Premier and Cabinet administers and approves government advertising.
Chapter 3	examines the monitoring and reporting of government advertising expenditure.
Chapter 4	examines how well departments comply with the committee approval process and assess the effectiveness of government advertising campaigns.

## Report cost

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This audit report cost \$315 000 to produce.

# 1. Context

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There are legitimate and accepted needs for advertising by governments. Advertising campaigns and communication programs can raise awareness, educate the public, and generate attitudinal and behavioural change about services, products, projects, laws, and policies.

To gain the desired outcomes, advertising campaigns must be clear about their objectives. This enables governments to strategically plan, develop and evaluate the creative concepts and media exposure.

Government advertising expenditure should be prudent, ensuring taxpayer funds are being used to genuinely provide information to the public, rather than to gain political advantage. This can be achieved by applying robust review and approval processes and guidelines.

## Types of campaign advertising and communication activities

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Paid advertising campaigns and communication activities are typically part of a department's larger communication strategy. Together with other unpaid advertising activities (such as ministerial media statements) they communicate themed messages to the community.

The *Queensland Government Advertising Code of Conduct* (the Code) and the *Buyer's guide for the campaign Master Media Advertising Placement Services Standing Offer Arrangement* (DPC-18-2012) define advertising and communication activities.

Campaign advertising and communication activities include:

- print advertising (for example, newspapers, magazines and inserts)
- electronic advertising (for example, television, radio and the internet)
- outdoor media (for example, billboards and bus/taxi advertisements)
- brochures, newsletters, direct mail-outs and other like forms of communication
- all other media services covered under the master media advertising placement services standing offer arrangement.

## Other communication activities

Departments are increasingly using other types of communication activities—sometimes to support campaigns and sometimes independently. They use them to raise awareness, to educate, and to generate attitudinal and behavioural change. These other activities include:

- communicating via departmental websites, including social media
- participating in sponsorships and promotional partnerships
- taking part in events and exhibitions
- using media releases and announcements
- contributing to community information programs and education activities.

Departments use social media for professional communication, and to share ideas and network with their stakeholders. In doing so, they must apply the Queensland Government Chief Information Officer's *Principles for the official use of social media networks and emerging social media*. These principles provide consistency in how departments use social media.

Departments also use social media sites as communications channels for unpaid and paid advertising placement, including:

- social networking sites such as Facebook, LinkedIn and Google+
- mass communication platforms such as Twitter, Skype and Tumblr
- video and sharing platforms such as YouTube, Instagram, Snapchat and Pinterest.

### Major or minor campaign advertising or communication activities

The Government Advertising and Communication Committee (the committee) approval process, set up by the Department of the Premier and Cabinet (DPC) in 2013, refers to major and minor campaign advertising and communication activities. The committee approves major campaigns. DPC notes minor campaigns and escalates them to the committee if required. Figure 1A details the differences between major and minor campaign advertising and communication activities.

**Figure 1A**  
Major and minor campaign and communication activities

Type of campaign	Thresholds for campaign advertising and communication activities
Major	<ul style="list-style-type: none"> <li>▪ Communication or advertising activity with a media placement spend over \$100 000 (noting that activity cannot be broken into segments to go under the threshold)</li> <li>▪ Television and/or cinema advertising, including community service announcements</li> <li>▪ Communication on major projects, programs and government initiatives</li> <li>▪ Major community engagement activities with a total budget of more than \$50 000</li> <li>▪ Statewide direct mail and/or inserts</li> <li>▪ Full page advertising in major metropolitan newspapers</li> <li>▪ Major recruitment activity (over \$50 000 advertising placement spend)</li> </ul>
Minor	<ul style="list-style-type: none"> <li>▪ Communication or advertising activity with a media placement spend under \$100 000</li> <li>▪ Major or sensitive community engagement activities with a total budget of less than \$50 000</li> <li>▪ Controversial or sensitive communication or advertising activity not included in a major campaign</li> <li>▪ Minor updates to existing campaigns</li> </ul>

Source: Department of the Premier and Cabinet.

## Relevant legislation

New South Wales and the Australian Capital Territory have specific legislation for government advertising. In Queensland, there is no specific legislative framework that governs government advertising campaigns or communication activities.

There are, however, processes in place to ensure that Queensland Government departments plan, develop, implement, fund, and evaluate campaign advertising and communication activities.

Each department's accountable officer (the director-general or equivalent) has the responsibility to achieve reasonable value for money in the department's operations. This responsibility includes ensuring expenditure, including campaign advertising and communication activity expenditure, is managed efficiently, effectively and economically. The following legislation outlines these responsibilities:

- *Financial Accountability Act 2009*
- *Financial and Performance Management Standard 2009*.



## Queensland Government Advertising Code of Conduct

DPC maintains the *Queensland Government Advertising Code of Conduct* which Queensland Government departments must observe when undertaking campaign advertising and communication activities. Appendix C lists the requirements of the Code and Appendix D details the entities to which the Code applies.

## Roles and responsibilities

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Figure 1B shows the roles and responsibilities for government advertising and communication activities as at the end of December 2016.

**Figure 1B**  
**Roles and responsibilities as at December 2016**

Accountability	Relevant source	Responsibilities
Government Advertising and Communication Committee	<i>Government Advertising and Communication Committee—Terms of Reference—September 2016</i>	<ul style="list-style-type: none"> <li>▪ Manage a whole-of-government communication and advertising plan, and make decisions about the appropriateness of individual departmental activity including media buying expenditure.</li> <li>▪ Coordinate whole-of-government departmental advertising and communication activities to ensure <ul style="list-style-type: none"> <li>– they are aligned with the government’s strategic priorities</li> <li>– linkages and efficiencies in delivery are considered across government campaigns</li> <li>– risks and challenges in activities proceeding or not proceeding are identified.</li> </ul> </li> <li>▪ Identify missed opportunities in departmental advertising where government priorities have not been communicated, and recommend if activity is required.</li> </ul>
Department of the Premier and Cabinet	<i>Government Advertising and Communication Committee—Terms of Reference—September 2016</i>  <i>Master Media contracts:</i> <i>Campaign advertising services (DPC-18-2012)</i> <i>Non-campaign advertising services (DPC-22-2011)</i>	<ul style="list-style-type: none"> <li>▪ Provide a secretariat for the Government Advertising and Communication Committee.</li> <li>▪ Administer the contracts for campaign and non-campaign services on behalf of all departments. (Non-campaign services can include information on recruitment, training courses, auctions, tenders, notices, and general announcements. They are outside the scope of this audit.)</li> </ul>
Department of Housing and Public Works	<i>Six standing offer arrangements related to marketing and communications</i>	<ul style="list-style-type: none"> <li>▪ Administer non-compulsory standing offer arrangements on behalf of all departments for services related to <ul style="list-style-type: none"> <li>– creative materials</li> <li>– public relations</li> <li>– media monitoring</li> <li>– market research</li> <li>– reserved printing</li> <li>– independent print management.</li> </ul> </li> </ul>
All departments	<i>Queensland Government Advertising Code of Conduct, Financial Accountability Act 2009, Financial and Performance Management Standard 2009, and Queensland Procurement Policy 2016</i>	<ul style="list-style-type: none"> <li>▪ Achieve reasonable value for money by ensuring the operations of the department are carried out efficiently, effectively, and economically.</li> <li>▪ Ensure government advertising complies with the <i>Queensland Government Advertising Code of Conduct</i>.</li> <li>▪ Submit advertising campaigns to the Government Advertising and Communication Committee, and to the Cabinet Budget Review Committee.</li> </ul>

Source: Queensland Audit Office.

## Departments

Departments must ensure they plan, develop, implement, fund, and evaluate campaign advertising and communication activities in accordance with the Code (Appendix C lists the full requirements of the Code). In addition, departments are responsible for ensuring that advertising and communication activities comply with the committee approval process.

Departments must:

- determine whether the campaign advertising and communication activity is a major or minor campaign
- submit the deliverables for each of the five stages of the committee approval process (the annual advertising plan, rationale, creative concept proposal, final creative materials, and evaluation) to their relevant director-general and minister for approval
- obtain approval from the committee at each of the five stages
- submit stages 1 and 3 to the Cabinet Budget Review Committee (CBRC) for approval.

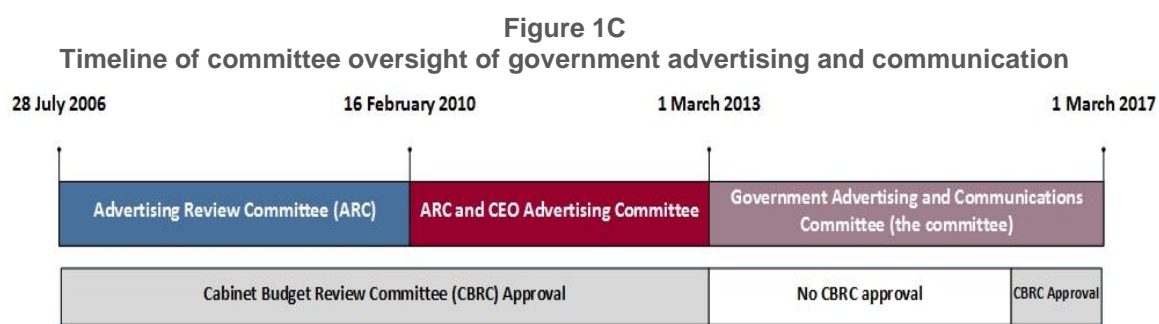
## Advertising approval committees

In the past 10 years, several committees have had a role in the approval and oversight of government advertising and communication activities. These are the:

- Advertising Review Committee—which reviewed campaign creative materials, timing and media mix
- CEO Advertising Committee—which reviewed the whole-of-government campaign advertising expenditure and rationale (although not creative materials designed for campaigns)
- Government Advertising and Communication Committee (the committee)—which approves major and notes minor communication campaigns undertaken by departments.

The CBRC has also had a role in endorsing major campaign advertising and communication activities in the past. They have recently taken up this role again.

Figure 1C shows when these committees operated and the involvement of the CBRC.



Source: Queensland Audit Office from committees' terms of reference.

At present, the committee, together with the CBRC, is responsible for reviewing and approving major advertising and communication activities undertaken by departments.

### Government Advertising and Communication Committee members

The committee consists of four representatives from DPC, a representative from one of the other Queensland Government departments (on a rotational basis), and a representative from the Office of the Premier. Its membership includes:

- Chair, the Deputy Director-General, Strategy and Engagement (DPC)
- Deputy Chair, the Executive Director, Strategic Engagement and Protocol (DPC)
- the Deputy Director-General, Policy (DPC)
- the Deputy Director-General, Corporate and Government Services (DPC)
- a representative from one of the other Queensland Government departments—deputy director-general level (or someone delegated by the department) on a three-monthly rotating appointment
- the Director, Communication Services (DPC)—advisory role only
- a representative from the Office of the Premier.

DPC administers and endorses whole-of-government processes for approving advertising and communication by departments, and provides the secretariat to the committee.

### The committee's approval process

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The committee facilitates the review and approval process of government advertising and communication campaigns to ensure that campaigns approved are:

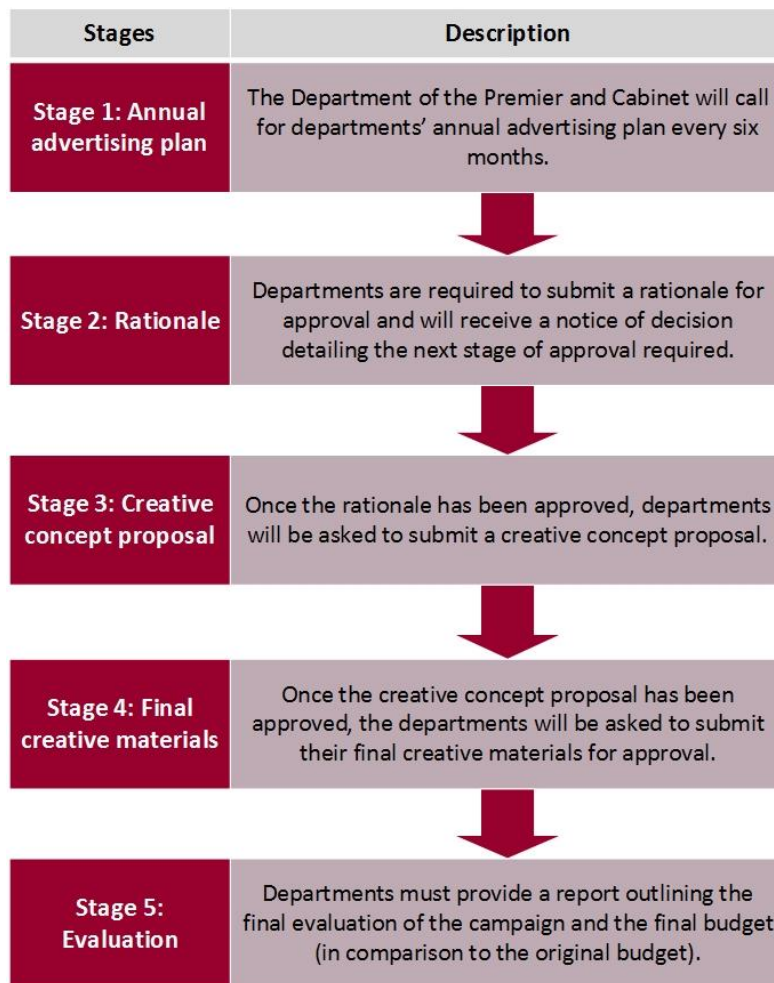
... enabling the government's top priorities of supercharging the Queensland economy and creating the most responsive and respected public service in the nation, as well as its ongoing commitment to lowering the cost of living for families, delivering better infrastructure and restoring accountability in government.

The committee's review and approval process states that the committee will:

- provide good governance
- align communication to government priorities
- provide value for money
- ensure a coordinated approach
- confirm departments' advertising adheres to the Code and other relevant communication policies, including confirming that it is funded out of an appropriate source (that is, not money designated for service delivery).

Figure 1D shows the five-stage committee process for major campaigns.

**Figure 1D**  
**Government Advertising and Communication Committee process**



Note: Applies to major campaigns and 'significant' minor campaigns only.

Source: Queensland Audit Office adapted from Department of the Premier and Cabinet documentation.

Departments must allow eight weeks for the entire committee approval process, plus six weeks for the CBRC approval process (or as advised by each department's Cabinet legislation and liaison officer).

## Guidelines

DPC provides guidance materials to departments via the GovNet Portal. It includes:

- the committee approval processes—explaining the types of advertising and communication activity for review
- templates—outlining what departments are to provide to the committee for review of major campaigns (stages 2–5) and what they need to provide when submitting minor campaigns for noting
- guidelines on
  - reaching culturally and linguistically diverse audiences
  - the *Queensland Government Advertising Code of Conduct*
  - the captioning policy—to assist people with sensory disabilities
  - the *Creative Advertising Services Standing Offer Arrangement*
  - the use of government authorisations in campaign advertising
  - the use of independently owned and ethnic media (produced by the campaign master media buying agency)
  - the master media buying procedures and services manual (produced by the campaign master media buying agency)
  - the *Non-campaign Advertising Services Handbook* (produced by the non-campaign master media buying agency)
  - the *Buyer's guide for the non-campaign Master Media Advertising Placement Services Standing Offer Arrangement*
  - the *Buyer's guide for the campaign Master Media Advertising Placement Services Standing Offer Arrangement*
  - the *Queensland Government Advertising Approvals Process*
- forms—for campaign and non-campaign planning and briefing, booking of advertising placement, stand-alone advertising requests, and website posting.

## Purchasing advertising and communication services

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The following responsibilities relate to the purchase of government advertising and communication activities:

- Each department is responsible for all expenditure (inclusive of advertising expenditure) to ensure that it achieves value for money.
- The Department of Housing and Public Works administers the creative material services panel (for example, for the development of advertising material) on behalf of the Queensland Government. It is not mandatory for departments to use suppliers from this panel.
- DPC administers the campaign master media advertising placement standing offer arrangement with a single media agency. This is a mandatory standing offer arrangement.

## Government advertising supplier arrangements

At stage 2 of the approval process (the rationale), departments can begin engaging services to undertake campaign advertising and communication activities. Eight whole-of-government supplier arrangements are available for use when developing, implementing and evaluating government advertising and communication activities.

The Department of Housing and Public Works administers six supplier arrangements for creative material services, public relations, print services, market research and public relations. As none of these arrangements are compulsory, departments can use their own procurement processes.

DPC administers the remaining two supplier arrangements. These are the:

- campaign master media advertising placement services standing offer arrangement
- non-campaign master media advertising placement services standing offer arrangement.

Both of these relate to media buying (placement) and it is compulsory for the 21 departments to use them. Other public sector entities can access the master media buying arrangement, but it is not compulsory.

### Campaign master media buying arrangement

The services available for purchasing through this arrangement are:

- media strategy and planning
- buying media placement.

### Media channels

The channels available to buy under the arrangement include:

- print advertising (for example, newspapers, magazines and inserts)
- electronic advertising (for example, television, radio and online)
- outdoor media (for example, billboards and bus/taxi advertisements)
- brochures, newsletters, direct mail-outs and other like forms of communication.





## 2. Administering and approving advertising

### Chapter in brief

The Department of the Premier and Cabinet (DPC) and the Government Advertising and Communication Committee (the committee) are primarily responsible for administering and approving major advertising for the 21 state government departments.

Effective governance and oversight of government advertising and communication activities involves ensuring that all planning, development, implementation, funding, and evaluation occurs in accordance with the *Queensland Government Advertising Code of Conduct* (the Code).

### Main findings

- The committee's role in approving advertising is not clear, compared to the role of other parties such as directors-general and the Cabinet Budget Review Committee. Having multiple parties approving at each stage of the committee's process may lead to duplication of effort or gaps in approval.
- The committee's processes do not describe how they assess that each department is complying with the Code and not funding advertising out of money designated for service delivery. The committee cannot demonstrate it is fulfilling its assurance function.
- The committee's membership comprises four representatives from the DPC, a departmental representative (from one of the other Queensland Government departments, on a rotational basis), and a representative from the Office of the Premier. There is no process to reduce the risk when DPC reviews and approves its own campaigns.
- DPC's definitions of campaign advertising and communication activities are unclear, in both its policy and guidance materials. Further, there is no one place for departments to refer to for definitions. This has led to inconsistent understanding by users of the process.
- DPC has developed a number of guidelines, templates and forms to support departments in complying with the Code and committee processes. But departments advised us that they need more examples of better practice to assist them in developing, implementing, and evaluating campaign advertising and communication activities effectively.
- Advertising governance arrangements are not clear on how and when creative materials developed for campaigns can be used on department-owned social media sites. We found one department posted creative materials on its social media sites whilst formal approval under the committee's process was in progress.
- DPC's process audits, part of their quarterly reviews, do not provide sufficient assurance that advertisements purchased through the master media buying agreement are actually placed.

## Introduction

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Most jurisdictions in Australia have independent reviewers or committees charged with approving advertising and communication activities for public sector entities. These governance bodies:

- provide independent scrutiny of expenditure
- prevent the use of duplicate or contradicting messages
- ensure the consistency and effectiveness of advertising activities.

In Queensland, the Government Advertising and Communication Committee (the committee) undertakes this role, supported by the committee secretariat within the Communication Services area of the Department of the Premier and Cabinet (DPC).

We expected to find clearly defined governance arrangements that were applied appropriately, and designed for effective oversight and administration of campaign advertising. We also expected to find advertising policies, guidelines and examples that reflected better practice.

This chapter examines the effectiveness of:

- the governance framework for government advertising and communication activities
- the guidance provided to departments for planning, developing, implementing, and evaluating campaign advertising and communication activities.

## Audit conclusions

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The committee provides oversight by compiling the advertising and communication activities from the 21 state government departments and identifying opportunities for coordination (to reduce the risk of communicating conflicting messages). However, the committee could not provide evidence that it clearly addressed its duty to ensure that:

- departments' advertising complies with the *Queensland Government Advertising Code of Conduct* (the Code) and other relevant communication policies
- departments do not pay for government advertising using money designated for service delivery.

Even though submissions to the committee pass through numerous hands during the process for reviewing and approving, there is no one point where activities are critically assessed against the Code.

Advertising regulations do not apply to all public sector entities that undertake advertising and communication activities. This leaves a gap in regulating and reporting Queensland public sector advertising.

DPC's provision of guidance to departments is not as effective as it could be. It does not include better practice examples or how-to guides to assist departments with campaign advertising and communication activities. This is in contrast with other jurisdictions such as New South Wales, where they provide extensive guidance and assistance.

## Applying the committee approval process

### Delivering good governance

The committee's approach to overseeing government advertising and communication activities aligns the messages advertised by departments at a whole-of-government level. We were provided with practical examples of where the committee has prevented the communication of contradicting messages and has coordinated campaigns with similar messages or timeframes to avoid market saturation.

DPC can further strengthen the committee approval process and the committee's functions by:

- clarifying the role of the committee
- improving definitions and guidance for agencies
- diversifying the committee's membership
- assessing compliance with the Code.

### Clarifying the role of the committee

DPC's objectives and purpose for each stage of the process are not clear and do not align to their stated aims in the terms of reference. Figure 2A shows the information departments must submit at each stage to obtain approval.

**Figure 2A**  
Approvals within the Government Advertising and Communication Committee process

Stages	Requirements of departments	Approved by
<b>Stage 1: Annual advertising plan</b>	<ul style="list-style-type: none"> <li>▪ lists of campaigns proposed for the next 12 months including topic or issue to be addressed and proposed expenditure</li> </ul>	DG Minister Secretariat (review) The committee CBRC
<b>Stage 2: Rationale</b>	<ul style="list-style-type: none"> <li>▪ provides overview of research and data supporting campaign need, target audiences, objectives, funding source, and budget breakdown</li> <li>▪ provides a statement of compliance with the <i>Advertising Code of Conduct</i></li> </ul>	DG Minister Secretariat (review) The committee
<b>Stage 3: Creative concept proposal</b>	<ul style="list-style-type: none"> <li>▪ details objectives, key messages, draft advertising placement schedule (channels), evaluation approach, and budget</li> <li>▪ provides detailed creative concepts for all channels (story boards, scripts, etc.)</li> </ul>	DG Minister Secretariat (review) The committee CBRC
<b>Stage 4: Final creative materials</b>	<ul style="list-style-type: none"> <li>▪ provides a final media schedule and budget</li> <li>▪ provides final creative executions</li> <li>▪ provides a checklist to ensure compliance with corporate ID, website regulations, inclusions of authorisation statements</li> </ul>	DG Minister Secretariat (review) The committee
<b>Stage 5: Evaluation</b>	<ul style="list-style-type: none"> <li>▪ provides a summary report of evaluation measures</li> <li>▪ provides the final cost compared to budget</li> </ul>	DG Minister Secretariat (review) The committee

Notes: DG—relevant department's director-general (or equivalent); Minister—relevant department's minister; Secretariat—the committee secretariat; CBRC—Cabinet Budget Review Committee. Process applies to campaigns that fit the major campaign criteria or 'significant' minor campaigns.

Source: Queensland Audit Office.

Multiple levels of reviews from senior executives and ministers make the role of the committee at each stage unclear. Additionally, at stages one and three, the committee does not have the final approval for major and significant campaigns. Finally, it is not clear in the process how the committee assesses the information provided. For example, the information requested by the committee does not currently enable them to assess whether a department has achieved value for money or has funded advertising out of money designated for service delivery.

DPC needs a more structured work program at each stage to fulfil its role, deliver its process efficiently, and require departments to submit relevant information at practical points.

### Defining campaign advertising and communication activities

The *Buyer's guide for the campaign Master Media Advertising Placement Services Standing Offer Arrangement* includes a definition of campaign advertising and communication activities.

A department must decide whether its advertising or communication activities should follow the committee approval process before engaging the master media buying agency (the agent who negotiates the price and place of advertisements).

DPC's definition of campaign advertising is:

... advertising, other than non-campaign advertising, that is intended to raise awareness, inform, or educate the public or generate positive attitudinal or behavioural changes (social marketing) in relation to services, activities, projects, laws, or policies of Queensland Government.

With this definition, it is not clear what constitutes campaign advertising. DPC has also not defined communication activities, despite the committee approval process applying to campaign advertising and communication activities over the major and minor campaign thresholds.

Without clear definitions, there is a risk that departments inconsistently define the activities that require approval and not submit them to the committee when they should be doing so.

### Assisting and guiding departments

DPC is responsible for administering and endorsing whole-of-government processes for reviewing and approving advertising and communication activity by Queensland Government departments.

In August 2016, DPC undertook an internal review in which it identified that there was insufficient guidance to support departments in planning, developing, implementing, and evaluating campaigns. During our audit, DPC provided us with draft materials with which they intend to address this gap. We assessed that the draft documents still did not include sufficient guidance. They also did not provide better practice examples for departments.

With improved guidance, departments will be able to consistently address shortcomings in their campaigns. We found the gap most prevalent in stage 5 of the committee approval process. At this stage, departments are required to report on the evaluation of campaign advertising and communication activities.

### Guidance materials—comparison with other jurisdictions

To highlight examples of better practice, we reviewed what guidance material other states provide for developing, implementing and evaluating public sector campaign advertising and communication activities.

The New South Wales (NSW) Government's Department of Premier and Cabinet, through 'NSW Strategic Communications' establishes communication protocols and policies, and supports the delivery of effective communication. NSW Strategic Communications provides guidance materials, including a dedicated website, on campaign advertising and communication activities. Figure 2B summarises the guidance available.

**Figure 2B**  
**New South Wales' guidance**

**Planning an advertising campaign**

- Getting started—the planning cycle, approvals required, and stakeholders to consider.
- Campaign objectives—how to set SMART (specific, measurable, achievable, realistic, and timed) performance measures.
- Target audience—identifying and setting target audiences.
- Campaign research—considering what works and what doesn't work.
- Risk assessment—benefits of risk assessment during the planning stage.
- Advertising and media agencies—roles and responsibilities of different types of agencies.
- Engaging an advertising agency—procurement requirements, tips on writing a brief, and tips on how to work with advertising agencies.
- Working with media planning agencies—how to brief and work with media planning agencies.
- Communication strategy—key elements and keeping costs down.
- Campaign implementation—next steps after planning.
- Monitoring and evaluating—outlining plans early for evaluation activities, and different evaluation methodologies.

Source: *New South Wales Strategic Communications' website.*

NSW Strategic Communications also organises workshops on relevant topics such as digital communications, getting the best from creative agencies and fundamentals of evaluation.

They provide access to extensive information on evaluation. Departments can use this to develop and implement better practice for measuring the effectiveness of campaign advertising and communication activities.

#### Diversifying the committee's membership

The membership of the Queensland Government Advertising and Communication Committee (the committee) consists of senior DPC employees, a representative from another Queensland Government department on a rotational basis (from November 2016), and a representative from the Office of the Premier.

DPC's campaigns ranked fifth largest among departments in terms of expenditure on advertising placement in 2015–16 and third largest in 2014–15, so there is a high probability that conflicts of interest could arise. There are no processes in place for dealing with conflicts of interest and maintaining the independence of the committee.

The committee's terms of reference were last updated in April 2017. The update included a change of membership to include a member from another Queensland Government department (on a rotational basis). However, the committee's composition is still two-thirds DPC staff.

#### Aligning communication with government priorities

The committee adequately conducts its role of overseeing plans for government advertising and communication activities. It achieves this through stages 1 and 2 of the committee's five stage approval process, when departments lodge their annual plans and rationales for advertising.

Demonstrated examples of the committee's work include:

- the Department of Health's *What's your relationship with alcohol?* and the Department of Transport and Main Roads' *Mates Motel* campaigns, where the messaging needed to be consistent
- Queensland Fire and Emergency Services' *If it's flooded forget it* and the Department of Infrastructure, Local Government and Planning's *RACQ Get Ready Queensland* campaigns, where the messaging was duplicated.

## Assessing value for money

Departments are ultimately responsible for ensuring value for money; however, DPC, as a central agency, facilitates value for money by managing the master media buying arrangement on behalf of the rest of the Queensland Government. DPC levies a contract management fee on other agencies when purchasing advertising placements and uses this to fund reviews. These reviews are intended to assess the master media buying agency's performance of whether Queensland Government is getting the best rates and what they paid for.

The quarterly reviews include:

- media buying and strategy reviews—which aim to ensure media buying and strategies are effectively reaching target audiences
- annual rate negotiation reviews—which aim to ensure the rate and placement concessions secured by the master media buying agency are in line with (or better than) current market changes
- process audits—which aim to match the correct amount of invoices, and verify that paid-for advertising placements occur and the accuracy of invoicing
- client satisfaction surveys—which aim to obtain feedback from public sector entities that have used the services.

The annual rate negotiation is useful for determining value for money, as it verifies the discount that agencies receive in relation to market rate movements. Results of the past two reviews have been positive, meaning that agencies have obtained rates better than market rate at the time.

However, the reviews do not adequately address the risk that paid placements are not appearing within the market. DPC's process audits are meant to acquit this risk, but the sample sizes are insufficient (12 out of 4000 invoices per quarter) and the placements are verified against supplier documentation. The task of verifying all placements is burdensome for agencies, so these process audits are currently very important in demonstrating value for money. Unfortunately, they are ineffective.

## Assessing departments' compliance with the Code

The committee's terms of reference state that an objective of the committee is to ensure compliance with the Code through the committee approval process.

The committee reviews submissions made by the departments. Each department ticks a box at stage 2 to confirm they have complied with the Code but does not provide any other information at that time. Stage 2 is not a practical time to assess compliance with the Code as the departments are yet to develop the creative materials. For example, it is not possible to ascertain that there is no political messaging in a radio advertisement if the department has not yet developed the script. DPC was unable to demonstrate how they comply with this objective despite advising us that the committee does assess compliance with the Code throughout the process.

## Obtaining Cabinet Budget and Review Committee approval

Over the past decade, the approval process of government advertising and communication activities has required departments to submit significant campaigns to the Cabinet Budget and Review Committee (CBRC) for approval. During the period of March 2013 to March 2016, departments were only required to obtain the committee's approval.

However, the Queensland Cabinet Handbook was not updated to show this change. It still reflects the process prior to March 2013, and mentions the previous advertising approval committee—the Advertising Review Committee.

In March 2016, the Director-General of the Department of the Premier and Cabinet wrote to all departments advising them of an updated process that requires departments to once again submit significant campaign advertising and communication activities to the CBRC for approval.

Out-of-date and contradicting policy is a risk for departments that don't use the process frequently and may not be aware of the actual requirements. This may affect compliance or timeliness when departments are unaware of the requirements, or refer only to the policy.

Since our audit, the DPC has advised that the Queensland Cabinet Handbook has been updated.

## Use of creative materials on social media

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Departments use social media as part of campaign advertising and communication activities. The different types of social media are:

- owned social media—which uses free tools to build a social community and interact with it, sharing posts and responding to customer comments. Examples include social media channels such as Facebook pages, Instagram, LinkedIn, Snapchat or Twitter accounts
- paid social media—which is a way of promoting content to drive traffic to owned social media. Paying to promote content can help create interest and increase exposure.

DPC has no guidance for departments on using creative material from campaign advertising and communication activities on owned social media. Paid social media is considered to be advertising if it is part of a major or minor campaign, and is governed and approved through the committee approval process.

Case study 1 provides an example of where one department put creative materials on owned social media prior to approval.

### Case study 1

#### Using creative material from a major campaign on owned social media sites

Queensland Treasury submitted the First Home Owners' Grant campaign for the committee's approval in May 2016 (stage 2—rationale). The committee did not initially approve the campaign—in June 2016 they stated that the amount of expenditure proposed was notably high. Queensland Treasury then procured creative material (stage 3). It also re-submitted its proposal with some of this creative material to the committee for stage 2 approval as part of a larger, major campaign.

Whilst the committee approval process continued, Queensland Treasury posted the First Home Owners' Grant advertising creative material it procured on its Facebook page and Twitter account. The Code is not clear that departments should not do this, as at the time it was not used for a paid advertising placement.

The following creative material appeared on 13 June and 4 August 2016.



The following creative material appeared on 6 and 8 September 2016.



The following creative material appeared on 1 November 2016.



The committee subsequently approved the First Home Owners' Grant major campaign in January 2017, seven months after Queensland Treasury originally sought approval, and after portions of the campaign had been released publicly using owned social media. This had the effect of reducing the value of the committee approving the final creative materials in stage 4 of the process.



## 3. Reporting advertising expenditure

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### Chapter in brief

Most government jurisdictions in Australia report on what they spend on advertising and communication activities to varying degrees. Some jurisdictions report on total campaign expenditure (including development, monitoring and evaluation), while others report only on the total expenditure on advertising placement, which is the largest component of most campaigns.

In Queensland, despite the fact that there is no requirement for government agencies to report on what they spend on advertising, the Department of the Premier and Cabinet (DPC) reports on total expenditure on advertising placement for the 21 state government departments.

This chapter examines the monitoring and reporting of government advertising expenditure.

### Main findings

- As there is no requirement to publicly report on advertising expenditure, departments do not do so in their annual reports, nor do they routinely aggregate it for internal reporting. Consequently, departmental senior management cannot proactively monitor how much they spend on advertising in aggregate.
- DPC reports expenditure on advertising placement for the 21 departments. However, advertising placement is only one component of advertising spend with departments also spending on planning, developing, implementing, funding, and evaluating campaign advertising and communication activities. Consequently, approximately 55 per cent of the total advertising expenditure by the 21 departments is not publicly reported by DPC.
- In addition, DPC only reports for those Queensland public sector entities covered by the *Queensland Government Advertising Code of Conduct*. These account for less than half of the Queensland public sector's advertising placement expenditure.
- DPC does not have rigorous quality assurance practices over the publicly reported information relating to expenditure on advertising placement. This means there is a higher risk that the information is incomplete and inaccurate.

## Introduction

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Transparency in reporting on government activities and expenditure is important in maintaining integrity and public trust. That is why most jurisdictions report on advertising expenditure to varying extents. For government advertising and communication activities, agencies can achieve this by reporting complete and accurate activity and expenditure.

This chapter compares the reporting of campaign advertising and communication activities to better practice in terms of:

- departmental reporting of advertising expenditure
- whole-of-government reporting of advertising expenditure.

## Audit conclusions

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The Department of the Premier and Cabinet (DPC) has improved the transparency of Queensland Government advertising by publicly reporting advertising placement figures (billed through master media buying agencies) on its website and on Open Data (the online portal for government data), despite no formal requirement to do so.

The Queensland Government's reporting could be further strengthened by publicly reporting the total expenditure on advertising and communication activities for departments, and on all advertising placement for Queensland public sector entities. DPC already collects data about all major advertising programs through the submissions to the Government Advertising and Communication Committee (the committee), including what it costs to plan, develop, implement, and evaluate campaigns. It could use this information to add to what it already discloses about expenditure on advertising placement to improve the completeness and accuracy of its reports.

Assurance processes over what is currently reported are weak. They need to be strengthened so the public can rely on the information as a complete and accurate representation of government advertising and communication activities.

## Whole-of-government reporting

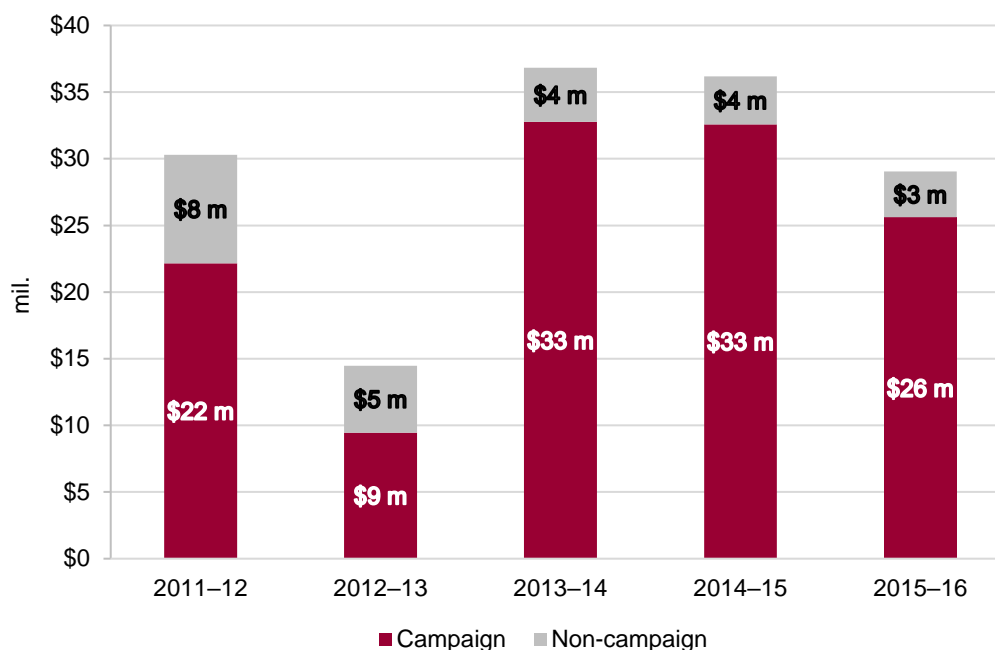
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Expenditure on advertising placement is the cost for placing an advertisement in the market (for example, on television, in magazines or on billboards).

Since 2011–12, the Queensland Government (through DPC) has reported its expenditure on advertising placement on DPC's website and on Open Data, but it only reports how much the 21 departments spend. (Appendix D lists the departments).

The reported figures include the cost of advertising placement expenses only. They do not include costs incurred by departments for the development, monitoring, or evaluation of campaign advertising or communication activities. Figure 3A shows the DPC-reported expenditure for both campaign and non-campaign advertising placement for the last five financial years.

**Figure 3A**  
DPC-reported annual expenditure on advertising placement for the 21 departments over the last five financial years



Notes: Amounts exclusive of Goods and Services Tax (GST). Non-campaign services can include information on recruitment, training courses, auctions, tenders, notices and general announcements. They are outside the scope of this audit.

Source: Queensland Audit Office from Department of the Premier and Cabinet website.

Figure 3A shows a decline in spending in 2012-13. The reason for the decline is unclear, because until 2013-14 there was no detailed internal reporting that outlined the number and name of campaigns. DPC capped advertising placement expenditure in the 2013-14 and 2014-15 financial years.

The master media buying agency (the agent who negotiates the price and place of advertisements) provides DPC with annual reports of the total expenditure on advertising placement.

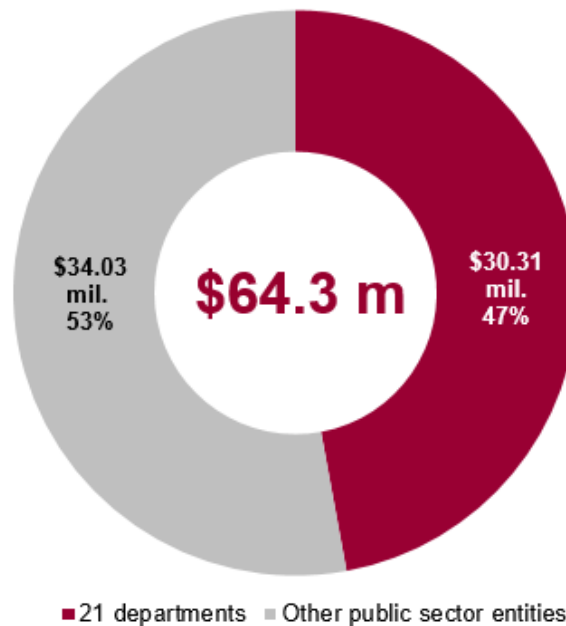
The reports detail the total expenditure on advertising placement for all Queensland public sector entity campaigns that have accessed the master media buying arrangement. In its public reporting, DPC separates out the expenditure by the 21 departments.

### Reporting total advertising expenditure

DPC only reports on the 21 departments' expenditure on advertising placement because these departments are the only Queensland public sector entities that are required to comply with the *Queensland Government Advertising Code of Conduct* (the Code) and the committee approval process.

Collectively, Queensland public sector entities spent \$193 million on advertising placement in the last three financial years. DPC's reported expenditure on advertising placement for the 21 departments is approximately 47 per cent of this total expenditure per year. The rest has been spent by other public sector entities, as shown in Figure 3B.

**Figure 3B**  
Average annual expenditure on advertising placement by public sector entity type  
(2013–14 to 2015–16)



Note: Amounts exclusive of GST.

Source: Queensland Audit Office adapted from Department of the Premier and Cabinet internal reports.

DPC does not publicly report on other public sector entities' advertising placement even where those other public sector entities are controlled and primarily funded by the state. Over the past three financial years, the proportion of other Queensland public sector entities' expenditure on advertising placement has risen.

This means that DPC is not currently reporting on a significant amount of Queensland public sector entities' advertising expenditure in its whole-of-government reporting. It is not, for example, reporting the advertising expenditure of statutory bodies such as:

- Queensland Art Gallery
- Queensland Museum
- Racing Queensland
- Tourism and Events Queensland (TEQ).

For instance, TEQ conducts significant campaigns to promote Queensland tourism destinations to the rest of the country and the world but is not included in Queensland's whole-of-government reporting. This is different to other jurisdictions like New South Wales, where the tourism body, Destination NSW, is included in publicly reported advertising expenditure.

#### Other jurisdictions' reporting

In comparison to better practice demonstrated in some other Australian jurisdictions, Queensland can improve its reporting about advertising. Figure 3C shows that of the nine Australian jurisdictions:

- three do not report advertising expenditure publicly (Australian Capital Territory, Northern Territory and Tasmania)
- six report publicly (Queensland, Victoria, Western Australia, New South Wales, South Australia and the Australian Government).

**Figure 3C**  
**Cross-jurisdictional reporting on expenditure**

Jurisdiction	Advertising and communication expenditure reported publicly
Queensland	<ul style="list-style-type: none"> <li>Departments' expenditure on advertising placement</li> </ul>
Victoria	<ul style="list-style-type: none"> <li>All agencies' expenditure on advertising placement</li> <li>Complete expenditure on advertising by campaign (greater than \$100 000) in annual reports</li> </ul>
Western Australia	<ul style="list-style-type: none"> <li>All agencies' complete expenditure on advertising in annual reports</li> </ul>
New South Wales	<ul style="list-style-type: none"> <li>All agencies' expenditure on advertising placement (broken down by campaign)</li> </ul>
Australian Capital Territory	<i>No reporting available</i>
South Australia	<ul style="list-style-type: none"> <li>All agencies' expenditure on advertising placement</li> </ul>
Tasmania	<i>No reporting available</i>
Northern Territory	<i>No reporting available</i>
Australian Government	<ul style="list-style-type: none"> <li>All agencies' complete expenditure on advertising (greater than \$100 000 and broken down by campaign)</li> </ul>

Note: 'Agencies' is a collective term that encompasses statutory bodies, government owned corporations, and other entities that conduct advertising campaigns in their respective jurisdictions.

Source: Queensland Audit Office from jurisdictions' websites.

Of the six jurisdictions that publicly report on what they spend on advertising:

- two (including Queensland) report on expenditure on advertising placement only
- one reports on aggregate expenditure on advertising placement but also requires agencies to report on complete campaign expenditure (greater than \$100 000)
- the remaining three jurisdictions report on all components of advertising expenditure (two with information on individual campaigns)
- two of the jurisdictions that report on all components have agencies disclose their advertising expenditure, by campaign, in their annual reports.

Better practice by other jurisdictions includes reporting of advertising spend on planning, developing, implementing, funding, and evaluating campaign advertising and communication activities.

#### Components of advertising expenditure currently reported

The Australian, Western Australian and Victorian governments report on total campaign expenditure inclusive of other components (such as research and development of creative materials) for a more complete disclosure of what agencies spend on government advertising and communication activities.

The total expenditure to plan, develop, implement, fund, and evaluate campaign advertising and communication activities includes:

- research and evaluation
- production and testing of creative materials
- social media and websites
- public relations, promotions and attendance at trade fairs and similar events
- sponsorships
- translation
- other related items and services.

Western Australia has a requirement under the *Electoral Act 1907 (WA)* that each public agency is to disclose, within their annual report, the total expenditure incurred during the financial year related to:

- advertising agencies
- market research organisations
- polling organisations
- direct mail organisations
- media advertising organisations.

#### Reporting by campaign

DPC's public reporting of campaign advertising is at the department level and not on specific campaigns. DPC could report at a more detailed level due to information it collects as part of the committee approval process and from its own internal reports.

For example, DPC's detailed internal reporting highlights the top five campaigns by annual expenditure on advertising placement. Figures 3D to 3F show the five most expensive departmental campaigns per year for the past three financial years.

**Figure 3D**  
Top five campaigns by expenditure on advertising placement—2015–16

Rank	Name	Department	Amount (\$)
1	If it's flooded, forget it	Queensland Fire and Emergency Services	3 527 512
2	Childhood immunisation	Department of Health	1 860 973
3	Drink driving	Department of Transport and Main Roads	1 243 714
4	Straight answers	Department of Health	1 142 361
5	Quit smoking	Department of Health	1 101 745

Note: Amounts exclusive of GST.

Source: Queensland Audit Office from Department of the Premier and Cabinet internal reports.

**Figure 3E**  
Top five campaigns by expenditure on advertising placement—2014–15

Rank	Name	Department	Amount (\$)
1	Strong choices	Queensland Treasury	3 700 591
2	Health guarantee	Department of Health	2 311 255
3	Obesity	Department of Health	2 282 515
4	Delivering outcomes	Department of the Premier and Cabinet	1 925 861
5	My smoking Phase 3	Department of Health	1 846 628

Note: Amounts exclusive of GST.

Source: Queensland Audit Office from Department of the Premier and Cabinet internal reports.

**Figure 3F**  
**Top five campaigns by expenditure on advertising placement—2013–14**

Rank	Name	Department	Amount (\$)
1	Strong choices	Queensland Treasury	7 636 745
2	Better place to do business	Queensland Treasury	2 868 919
3	First home buyers' grant	Queensland Treasury	2 735 490
4	Obesity	Department of Health	2 063 563
5	Development projects	Department of State Development, Infrastructure and Planning	1 744 708

Note: Amounts exclusive of GST.

Source: Queensland Audit Office from Department of the Premier and Cabinet internal reports.

### Assurance process for whole-of-government reported expenditure

In addition to DPC's quarterly reviews discussed in chapter 2, DPC's contract with the master media buying agency states that it must provide an annual report accompanied by an independent audit report. The annual report details the total expenditure on advertising placements by public sector entities. The purpose of the independent audit report is to provide DPC with reasonable assurance that the expenditure is complete and accurate.

The weakness is that the report provided by the master media buying agency to DPC is not an independent audit report. It is not an audit of the completeness and accuracy of the data providing reasonable assurance. The consultant prepares the report in accordance with 'agreed upon procedures' and examines:

- billing reports in a sample of advertising supplier's accounting systems
- the accuracy of a sample of 15 invoices out of more than 16 000 transactions across the whole of government each year
- three of the first and last billings each year to ensure the master media buying agency has recognised the transactions in the correct period
- any exceptions noted to the procedures above.

The 'agreed upon procedures' arrangement does not require the consultant to express an audit opinion or conclusion on the completeness and accuracy of the data. This means the master media buying agency does not provide DPC with an independent audit report as per its contractual obligations.

DPC does not currently assess the reports. As per the standard regarding 'agreed upon procedures', DPC should assess what it receives from the master media buying arrangement including:

- the timing, extent and adequacy of procedures performed
- the results of the assurance procedures conducted by the consultant
- whether any further work is required on identified exceptions.

### Department data

In Queensland, as there is no requirement for agencies to report government advertising and communication activities, most departments do not track their advertising activities or expenditure. Most agencies did not have the information we requested as part of this audit readily available. They reported to us that that it would be too time-consuming to collect it from across the organisation on a regular basis.

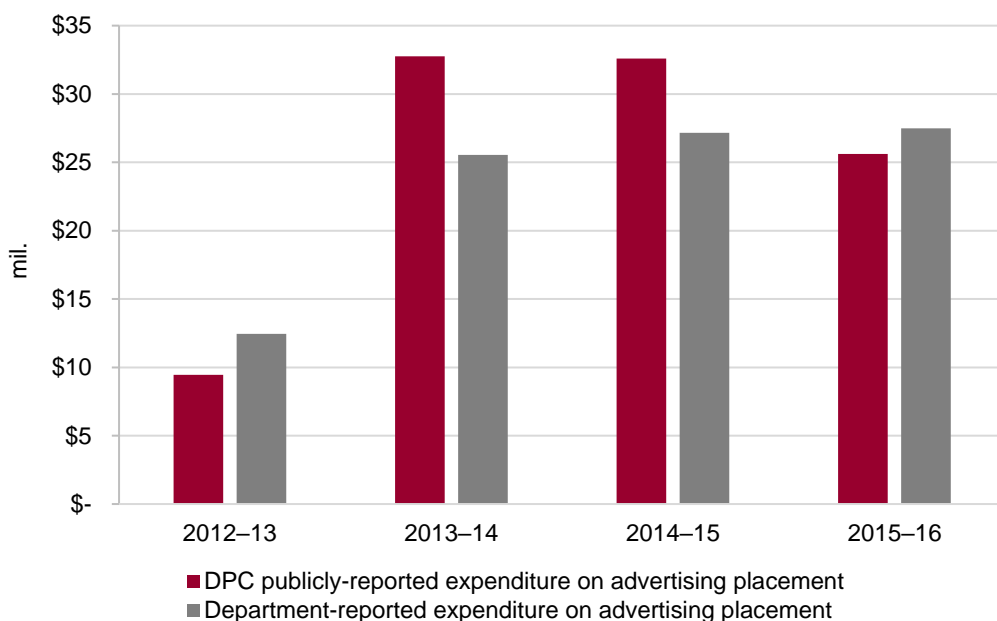
Principle 8 of the *Queensland Government Advertising Code of Conduct* (the Code) states that 'money designated for service delivery in a state budget must not be diverted to the cost of advertising'. Without aggregated advertising expenditure, those charged with governance in departments may lack the management information to confirm that they have complied with this principle.

Departments reported the following challenges with being able to provide us with data on their advertising expenditure:

- machinery of government changes (particularly in 2011–12 and 2014–15)
- staff changes and organisational restructures
- financial and records management system changes
- unclear definitions of what a communication activity is
- financial systems that are not set up to report on campaign advertising and communication activities.

Many departments stated that they could not provide us with data prior to 2012–13 because it was unreliable. Figure 3G shows the variances between the data reported to us by departments for the purpose of this audit compared to DPC's publicly available data for the period 2012–13 to 2015–16. These figures should be the same, but there are significant differences. These range between -32 per cent (in 2012–13) to 22 per cent (in 2013–14). This indicates that departments' advertising data may be incomplete or inaccurate.

**Figure 3G**  
**Variations between DPC reporting on expenditure on advertising placement and department data on advertising placement**



Note: Compares expenditure on advertising placement, not total expenditure on advertising and communication by departments.

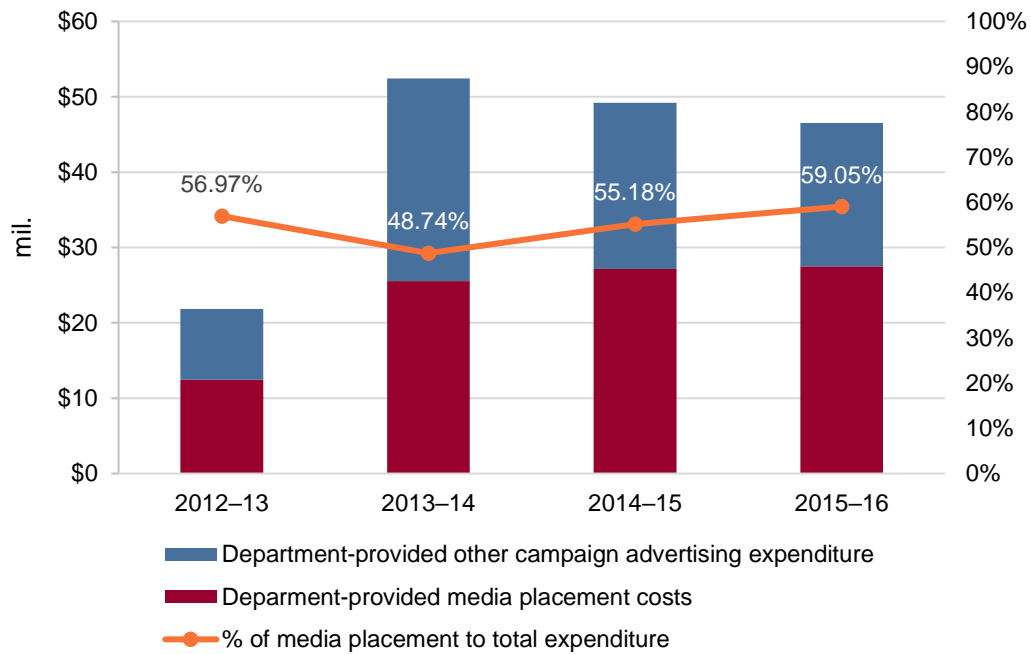
Source: Queensland Audit Office from Department of the Premier and Cabinet and departmental reported figures.

Queensland does not currently publicly report on a large proportion of its advertising expenditure.

Figure 3H shows that, on average, around 55 per cent of total advertising expenditure is for advertising placement costs, as reported by DPC. The remaining expenditure relates to costs for planning, developing, implementing, funding, and evaluating campaign advertising and communication activities.



**Figure 3H**  
**Proportion of advertising placement costs to total advertising costs—as provided by departments to QAO**



Note: Amounts exclusive of GST.

Source: Queensland Audit Office from department provided advertising figures.

This analysis is based on the data departments provided to us as part of this audit. They do not routinely report this information internally or externally.



## 4. Assessing effectiveness and compliance

### Chapter in brief

Departments that conduct campaigns must ensure:

- they plan, develop, implement, fund, and evaluate campaign advertising and communication activities in accordance with the *Queensland Government Advertising Code of Conduct* (the Code)
- that expenditure on campaign advertising and communication activities is managed efficiently, effectively, and economically, in accordance with the *Financial Accountability Act 2009* and the *Financial and Performance Management Standard 2009*.

Departments can achieve this through identifying and targeting the required audience, and by conducting regular assessments against campaign objectives and success factors. In this way, they can take steps to maximise the reach and effectiveness of their campaigns.

### Main findings

- Queensland Treasury did not adequately justify the need to use advertising as an effective medium to educate the public for their First Home Owner's Grant campaign.
- Two of the three departments have evaluated the effectiveness of their campaigns by assessing the extent to which their campaign performance measures have been met. But departments do not consistently complete formal campaign evaluation reports that analyse campaign results and value for money, and summarise lessons learned—what worked, what didn't work, and what would be completed differently next time. One department has implemented a formal communications evaluation report since the audit.
- Queensland Treasury circumvented the Government Advertising and Communication Committee (the committee) approval process by splitting the First Home Owners' Grant major campaign into two parts. It undertook advertising in the marketplace before receiving committee and Cabinet Budget Review Committee approval.
- The committee does not examine compliance with the Code at a practical time in the approval process. It examines compliance before departments have developed the creative materials.
- The departments we assessed in detail were not clear about responsibilities for assessing compliance with the Code. At the time of the audit, no departments were able to demonstrate how they assessed and confirmed compliance with the Code. One department has implemented formal confirmation procedures since the audit.

## Introduction

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Once departments have decided to advertise, they are responsible for:

- preparing and obtaining approval for advertising campaigns in accordance with the *Queensland Government Advertising Code of Conduct* (the Code) and the Government Advertising and Communication Committee (the committee) approval requirements
- monitoring and evaluating the effectiveness of their campaigns.

### Preparing and obtaining approval for campaigns

The Code's principles broadly state that:

- the advertising must be of clear benefit to the people of Queensland
- the advertising must be directed at or focused on the sections of the community to which it is relevant
- the advertising must be presented in objective language, must be free of political argument, and must not foster a positive impression of a political party
- there should be no advertising within six months of a scheduled election unless there is an urgent or emerging issue (or it satisfies other exceptions)
- the advertising should be consistent with and not conflict with other government advertising campaigns and communication activities
- money designated for service delivery in a state budget must not be diverted to pay for advertising.

For major advertising campaigns, departments make submissions to the committee and they must receive Cabinet Budget Review Committee (CBRC) approval of the campaign creative proposal before advertising in the market. At the fifth stage departments outline their campaign's evaluation. This has to be provided to the committee within three months of the campaign finishing.

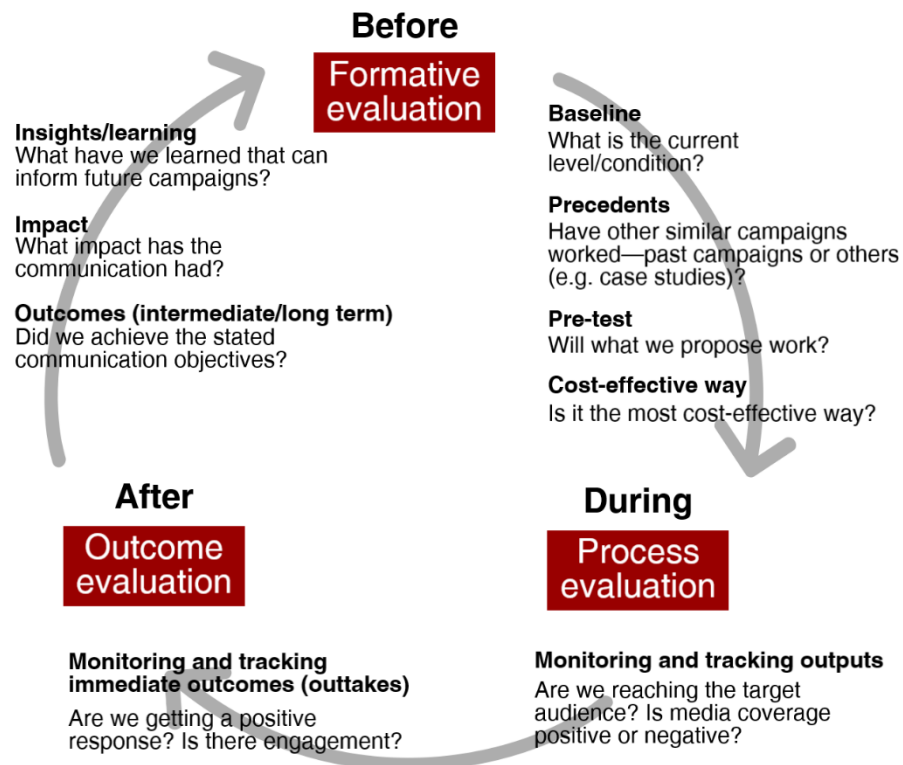
### Evaluating campaigns

To effectively assess the success of an advertising campaign, departments need:

- a strategy and plan, including clear and specific campaign objectives
- practical and relevant performance measures
- a baseline (describing the current level or condition) for each of the measures
- a methodology for critically evaluating and monitoring the success of the campaign.

Figure 4A is an example of a campaign advertising evaluation cycle.

**Figure 4A**  
Evaluation cycle for campaign advertising and communication activities



Source: Queensland Audit Office adapted from NSW Strategic Communications.

Figure 4A shows that to evaluate a campaign effectively, departments need to collect baseline data and measures before the campaign begins. During the campaign, continual monitoring will measure if they are reaching their target audiences. It will also allow for a strategic approach to marketing, involving adjustments to timeslots, channels (different types of media), or the campaign itself, if it is poorly received.

Measuring the outcomes and impacts of an advertising campaign after it has finished is important, not only in understanding the effectiveness of the campaign and being accountable for expenditure of public funds, but also in informing future campaigns. Methods for measurement include:

- quantitative surveys of targeted focus groups
- behaviour adoption rates (the rate of adoption is the relative speed with which the target audience adopt the behaviour)
- media tracking information from the master media buying agency.

This chapter assesses the effectiveness of the campaign evaluation processes for the three campaigns we selected. It also examines how well departments comply with the committee approval process that was designed to ensure departments comply with the Code.

The three campaigns we assessed were the:

- *Let's change the way we look at speed* campaign (speed campaign)
- First Home Owners' Grant campaign
- Childhood immunisation campaign.

## Audit conclusions

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Queensland Treasury's campaign was approved by the committee despite the fact that it did not effectively justify the need to use advertising as the communication medium. This means neither it nor the committee can be sure that the most cost-effective way of educating the public was selected.

Two of the three departments effectively evaluated the immediate results of their campaigns by measuring the extent to which key performance measures had been met. These performance measures included recall of campaign key messages and intent, among others. Longer-term program level objectives of behavioural changes need to be assessed over time, and both departments plan to do so.

The committee's process does not promote better practice evaluations as the templates that DPC provides to departments call for limited evaluation details. No department could demonstrate they completed a formal evaluation report against its own communication plan. This means they have not necessarily documented and reported lessons learned—what worked well, what didn't work, and what they would do differently next time—for the benefit of future campaigns. They have not documented their conclusions about whether their advertising campaigns were a cost-effective use of public funds. However, after our audit, one department designed a template that will facilitate a comprehensive assessment of its communication activities in the future.

Additionally, the departments we examined in detail could not demonstrate how they met the various requirements of the Code when developing their campaigns. Departments were unclear about their responsibilities and the responsibilities of the Department of the Premier and Cabinet (DPC) for confirming compliance with the Code.

## Evaluating campaign effectiveness

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While Queensland Treasury has not yet evaluated its campaign, the Department of Transport and Main Roads and the Department of Health have assessed elements of their campaigns' success. Both have obtained and analysed the market research and media results of their respective campaigns' performance. The Department of Health also evaluated results during its campaign and changed elements in order to achieve a better outcome.

The departments analysed results from their campaigns but didn't produce formal evaluation reports against their original communication plans. We expected to see critical analysis and formal reporting of all elements of the communication program at the conclusion of the campaigns including a summary of:

- original campaign objectives, target audiences, timing and campaign strategy
- expenditure compared to outcomes achieved
- learnings for future activity and recommendations—how these learnings would be applied in future campaigns.

DTMR has, since we commenced the audit, created a communications evaluation template that facilitates this type of better practice reporting.

### Let's change the way we look at speed campaign

Under the *Transport Operations (Road Use Management) Act 1995*, all money collected for penalties imposed for camera detected offences must be reinvested back into road safety. The areas that receive funding include: the administration of the program, road safety education and awareness programs, road accident injury rehabilitation programs, and road funding to improve safety where accidents most frequently happen.

DTMR select the most effective and efficient ways of using the money across the programs. Advertising and communication activities sit within road safety education and engagement.

DTMR evaluated the extent to which the short-term campaign level objectives were met. Program level objectives will be assessed as part of the overall program evaluation to determine if speeding behaviour changes over time.

#### A demonstrated need for the campaign

The speed campaign is part of a broader *Join the Drive to Save Lives* (Join the Drive) communication strategy. DTMR submitted the broader communication strategy for approval to the committee in September 2014.

DTMR provided substantial research to the committee supporting the fact that speeding continues to be an issue on Queensland roads. The research refers to the need for a multi-faceted approach to the speeding problem. DTMR integrate a suite of strategies with Queensland Police on enforcement, education and road safety infrastructure to address the road safety objectives.

Advertising is one of a range of approaches DTMR utilise to educate the broader public about speed. Figure 4B demonstrates how the *Let's change the way we look at speed* campaign fits into education and engagement within the overall Queensland Road Safety Action Plan.



Source: Queensland Audit Office from Department of Transport and Main Roads' documentation.

The objectives of the speed campaign presented to the committee at stage 3 (creative concept proposal) were to:

- encourage Queenslanders to believe that speeding at low levels is dangerous
- increase community participation in the Join the Drive social media, website, and/or other avenues
- see a reduction in (self-reported) speeding behaviour on Queensland roads in the longer term, as part of the Join the Drive social change strategy.

Figure 4C is a sample of the creative material for the speed campaign.

**Figure 4C**  
Sample of the creative material for the speed campaign



Source: Department of Transport and Main Roads.

#### The success of the campaign

DTMR identified the following performance measures for the speed campaign:

- post-campaign agreement with a range of awareness, attitudinal and behavioural statements, such as 'Since seeing the campaign, I am ...'
  - more likely to consider the speed limit when driving (I am aware that there is no such thing as 'safe speeding')
  - aware that sticking to the speed limit can help me prepare for the unexpected on the roads (I can't control everything but I can control my speed)
  - aware that any speed over the speed limit is dangerous/constitutes speeding
- recall of campaign key messages (target 60 per cent)
- in the longer term, as part of the overarching Join the Drive strategy, it is desired to see a reduction in (self-reported) speeding behaviour since exposure to the campaign
- in addition, data such as website and social media metrics to measure the desired increase in community participation.



DTMR linked the communication campaign to the overarching program objectives to ensure alignment with the other program activities. Only one of the four campaign performance measures included a target. DTMR could strengthen their performance measures by making them specific—by establishing targets, timeframes, and who is responsible for each measure of success.

DTMR's market research company and the master media buying agency evaluated the effectiveness of the campaign advertising and communication. Figure 4D shows the methodology and purpose for each of the three campaign evaluations conducted.

**Figure 4D**  
Evaluations conducted for the speed campaign

Name of report	Methodology	Purpose
Market research findings—post campaign evaluation: <i>Let's change the way we look at speed</i> (April 2016)	The market research company conducted 609 surveys of Queensland licence holders.	To assess: <ul style="list-style-type: none"> <li>intention to change behaviour</li> <li>knowledge and recall of campaign</li> <li>attitudes towards the topic (including possible concerns).</li> </ul>
Post campaign analytics report— <i>Let's change the way we look at speed</i> (no identified date)	The department produced a report on online reach using: <ul style="list-style-type: none"> <li>website analytics</li> <li>search engine analytics</li> <li>analytics for Facebook and Twitter.</li> </ul>	
Post campaign report (media)— <i>Let's change the way we look at speed</i> (May 2016)	The campaign master media buying agency provided analysis of different types of media (channels) bought—no target audience.	To assess the campaign's reach (by media channel) for the nominated target audience.

Source: Queensland Audit Office from Department of Transport and Main Roads evaluation reports.

Both external reports include a one page summary of results for the evaluation. The master media buying agency's post-campaign report measured the success of the campaign against the following:

- challenge the belief that speeding is one of the least dangerous driving behaviours
- challenge the social acceptability of speeding and place it on the public agenda as an important social issue
- (long-term objective) in connection with the overarching Join the Drive strategy—see a reduction in speeding behaviour.

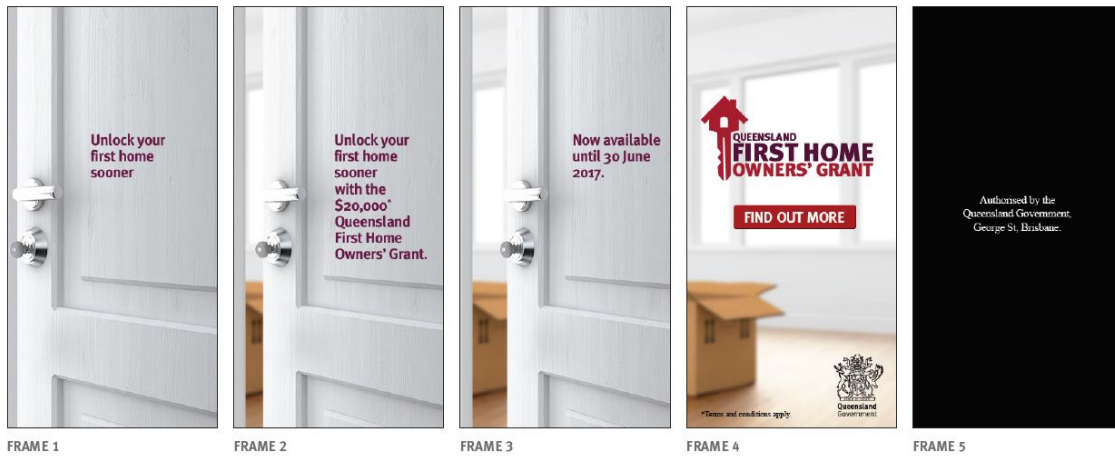
These objectives were measured by looking at the intent of drivers, not the actual speeding behaviours. The results indicate the campaign reached the desired target audience and exceeded the target of 60 per cent for recall of key messages. The long-term objective is part of the Join the Drive strategy that DTMR intends to evaluate in the future.

### First Home Owners' Grant campaign

Queensland Treasury initially received in principle support for the First Home Owners' Grant campaign, but it did not obtain committee approval. It then split the campaign into two components. The first portion was never evaluated—Queensland Treasury has not assessed whether it was effective. The second component is ongoing and Queensland Treasury did not evaluate it before completion of this audit.

Figure 4E is a sample of the creative material designed for the first component of the First Home Owners' Grant campaign.

**Figure 4E**  
**Sample of the creative material for the First Home Owners' Grant campaign**



Source: Queensland Treasury.

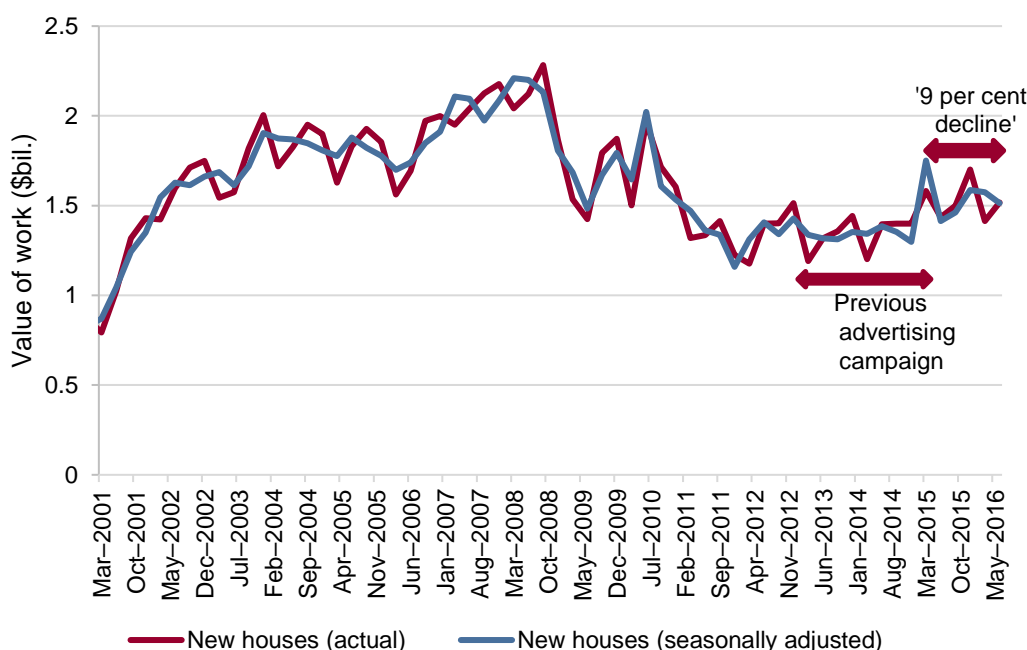
**A demonstrated need for the campaign**

In June 2016, amendments to the *First Home Owner Grant Act 2000* were passed as a result of a 2016–17 budget announcement. Queensland Treasury developed an information campaign to inform the public of the \$5 000 boost to the already existing grant.

Queensland Treasury stated in its stage 2 (rationale) submission to the committee that a previous campaign in 2013 increased applications for the grant by 197 per cent in 2013–14 and 22 per cent in 2014–15. Queensland Treasury had recorded a 47.9 per cent decline in First Home Owners' Grant applications in the previous year and quoted Australian Bureau of Statistics' (ABS) data that revealed '...construction of new houses in Queensland fell by 9.0 per cent in 12 months to March 2016'.

Figure 4F shows the ABS data that Queensland Treasury used to demonstrate the need for the campaign.

**Figure 4F**  
Value of work completed for new Queensland homes



Source: Queensland Audit Office using the Australian Bureau of Statistics data.

The data does not demonstrate the need for the campaign, as it is not conclusive that First Home Owners' Grant applications equate to construction contracts. In addition, there are other factors impacting on the construction of new houses (for example, the availability of land).

Queensland Treasury's '9 per cent decline' was due to an abnormal quarter in March 2015. The average in the period (March 2015 to March 2016) was \$1.55 billion, while the value of works for March 2016 was \$1.58 billion, which was slightly above the average for the period. The average value of work for the last ten years is \$1.37 billion, meaning that March 2016 was significantly above average (14.6 per cent).

Also, the period that Queensland Treasury claimed to be successful for the prior campaign does not show a sustained rise in the value of work.

Other factors relevant to demonstrating the need for the campaign include:

- the proportion of Queenslanders over the age of 18 who have purchased their first home relative to those who have not
- the number of First Home Owners' Grant applications approved and grants paid.

Queensland Treasury did not use these to justify the need for the campaign.

### The success of the campaign

As mentioned, Queensland Treasury split the campaign into two components. In July and August 2016, the department ran the first component of the First Home Owners' Grant campaign, which appeared online and on radio. It has not evaluated this component of the campaign.

The second component is ongoing, with a television component that was to appear in February 2017. As this component is not finalised, the campaign is yet to be evaluated for effectiveness.

### Childhood immunisation campaign

The Department of Health sufficiently and appropriately demonstrated the need for the Childhood immunisation campaign through relevant and up-to-date research.

It evaluated elements of the campaign's effectiveness but has not completed a comprehensive post campaign evaluation of the cost-effectiveness of the campaign and the lessons learned for future campaigns. The Department of Health's analysis was complicated by measures, target audiences and sub-objectives that changed during the campaign.

Figure 4G is a sample of the creative material for the Childhood immunisation campaign.

**Figure 4G**  
Sample of the creative material for the Childhood immunisation campaign



Authorised by the Queensland Government, George St, Brisbane.

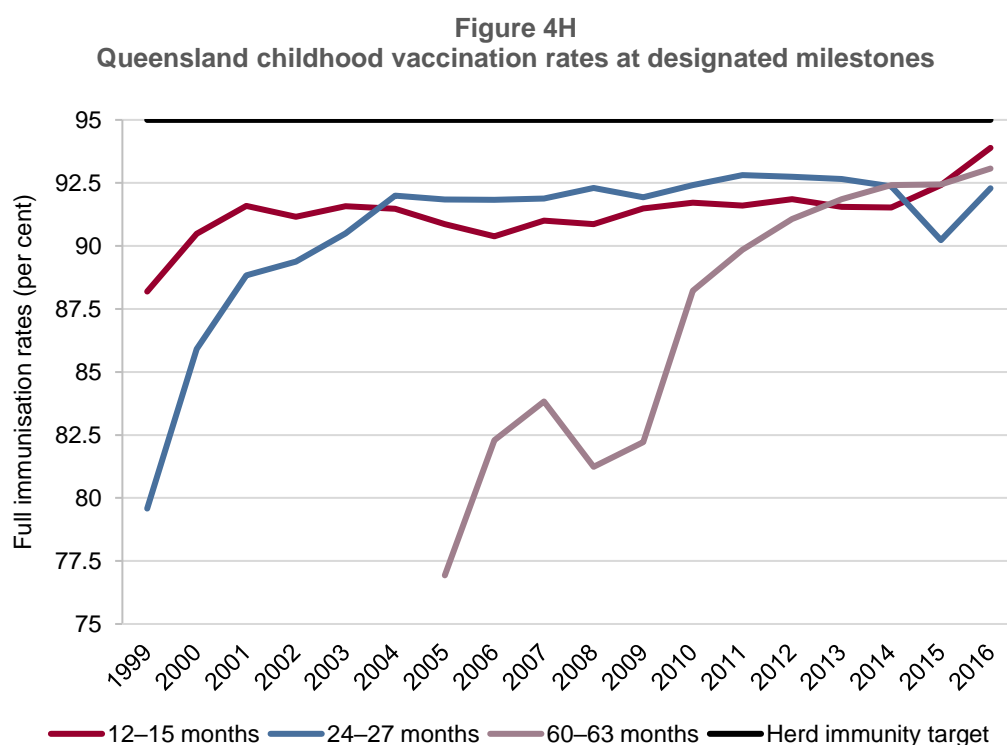
Source: Department of Health.

### A demonstrated need for the campaign

The Department of Health's research shows that it is scientifically accepted that the community benefits from immunisation, as it inhibits many preventable, life-threatening diseases. On-time vaccination (as outlined in the *Queensland Childhood Immunisation Schedule*) is important because babies and young children are the most vulnerable to these diseases.

Communities also benefit when people are immunised. The concept of 'herd immunity' is that people who cannot be vaccinated (for medical reasons) have a significantly lower chance of contracting these diseases if a high percentage of the population is immunised. The target rate for this is 95 per cent of the population.

In Queensland, the current rate of on-time vaccination of children under five years old averages about 93 per cent. This has improved significantly from the early 2000s through increased awareness and through addressing barriers such as the cost and availability of vaccines. However, Queensland continues to be below the ideal 95 per cent for herd immunity, as Figure 4H shows.



Notes: The inclusion of new immunisations to the coverage calculation in December 2014 caused a drop in the 24 to 27 month coverage rates. The coverage rate dropped because the criteria to be assessed as fully immunised included more vaccines. The more vaccines included in the assessment, the higher the likelihood of reduced coverage rates. This usually resolves over time as the changes become more routine.

Source: Queensland Audit Office from the Australian Childhood Immunisation Coverage Register website.

The Department of Health has identified, through research, several barriers to increased vaccination rates. These include:

- concerns over the safety of vaccines
- forgetfulness about the timing of vaccines, including over-reliance on general practitioners for reminders
- low awareness of the need for vaccinations and low availability of vaccination services for Aboriginal and Torres Strait Islander parents/carers.

#### The success of the campaign

The Department of Health did not evaluate the Childhood immunisation campaign's specific targets for Aboriginal and Torres Strait Islanders and of culturally and linguistically diverse people. However, the Department of Health did capture these audiences with the whole of population cohort of expectant mothers and mothers of children aged zero to six.

Queensland Health developed a separate program, 'Bubba Jabs', which was used to target Aboriginal and Torres Strait Islander women in rural and remote areas. This program included culturally appropriate materials and was delivered by Queensland Health's health practitioners across Queensland. The department developed a suite of translated materials and provided it to key stakeholders for distribution. We did not assess these communication activities.

The Department of Health's primary objective for the campaign was 'to increase adherence to the childhood immunisation schedule'. Evaluating this objective is problematic, as it focuses on the outcome of the overall program of childhood immunisation and not of the advertising campaign. The portion of the campaign attributable to this objective is not measurable as there are other influencing factors that can contribute to or hinder progress towards this objective.

Figure 4I shows the Department of Health's report against the entire program objective for immunisation in its 2015–16 annual report.

**Figure 4I**  
**Vaccination rates at designated milestones—targets versus actuals 2015–16**

Designated milestone	Target (per cent)	Actual (per cent)
All children 12 to 15 months	95.0	93.2
All children 24 to 27 months	95.0	91.4
All children 60 to 63 months	95.0	92.7

Source: Queensland Audit Office from Department of Health 2015–16 annual report.

The Department of Health evaluated the Childhood immunisation campaign against the following campaign objectives:

- to increase adherence to the childhood immunisation schedule
- to raise awareness of the importance of on-time vaccination
- to raise awareness of how changes to state legislation could affect childcare options if a child's immunisations are not up to date.

The Department of Health surveyed a sample of mothers and expectant mothers to find out whether they intended to have their children immunised. This was the measure set to 'increase adherence to the childhood immunisation schedule'. However, this does not necessarily translate into the behaviour of having the child immunised on time, particularly when the measure is tested within a group environment. It only measures intent at that point in time.

While the Department of Health will only be able to measure the first objective in the long term, it can reliably measure the other two in terms of the recall of the campaign by the target audiences.

During the evaluation, the Department of Health measured the success of the campaign against targets and commissioned four evaluation reports (Figure 4J).

**Figure 4J**  
**Evaluations conducted of the Childhood immunisation campaign**

Name of report	Methodology	Purpose
Process evaluation (mid campaign)— May 2015	A market research company conducted 200 surveys of expectant mothers and mothers with children aged 0–6.	To assess: <ul style="list-style-type: none"> <li>▪ intention to change behaviour</li> </ul>
Quantitative outcome evaluations (post campaign)— July 2016	A market research company conducted 220 surveys of expectant mothers and mothers with children aged 0–6.	<ul style="list-style-type: none"> <li>▪ knowledge and recall of campaign</li> <li>▪ attitudes towards the topic (including possible concerns).</li> </ul>
Qualitative outcome evaluations (post campaign)— July 2016	A market research company conducted 38 surveys of expectant mothers and mothers with children aged 0–6.	
Post campaign analysis report— Childhood immunisation (no identified date)	The campaign master media buying agency provided analysis for media channels bought targeting women aged 25–44.	To assess the campaign's reach (by media channel) for the nominated target audience.

Source: Queensland Audit Office from Department of Health evaluation reports.

The evaluations measured:

- attitudes to immunisation, including the intent of mothers to immunise their children
- information sources for childhood immunisation
- campaign awareness and performance—including awareness of the VacciDate app (a tool to help remember and manage vaccination dates) and of legislation changes.

The results of the first phase evaluations show:

- positive responses for reported immunisation rates, which improved slightly from the baselines
- a significant increase in the awareness of the VacciDate app during the campaign
- a significant decrease in VacciDate awareness post campaign
- that opinions did not change regarding the safety of vaccines.

Within its stage 5 (evaluation) submission to the committee, the Department of Health did not link these measures to the campaign objectives, so it was not evident that progress had been made. More than half of the goals did not have a baseline from the prior campaign and a quarter of the goals (those related to Indigenous people) were not assessed post-campaign. The Department of Health states that the 'Bubba Jabs' program addressed this gap but it was not evaluated due to the low value of expenditure.

The Department of Health evaluated the campaign outside of the committee approval process. Its evaluation shows positive changes in the behavioural measures, but awareness and recall of the campaign were low. Based on this information, the Department of Health changed its media strategy to media channels that would reach more people and the metrics were significantly higher for the second phase. This shows the department performed a meaningful evaluation and was able to optimise the campaign. It did not include an evaluation of the cost-effectiveness of the campaign and the lessons learned for future campaigns.

## Preparing and obtaining approval for campaigns

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Two of the three campaigns we examined complied with the committee approval process. Queensland Treasury's First Home Owners' Grant campaign did not. It did not receive final committee or CBRC approval before advertising occurred.

As agreed with DPC, DTMR's submissions were presented at a higher program level (that is, all the road safety campaigns) to reduce duplicate information from prior years' submissions. The committee accepted and endorsed DTMR's submissions, even though this resulted in DTMR not answering key questions about individual campaigns. Questions from stage 2 not answered for individual campaigns include:

- Does the campaign adhere to the *Queensland Government Advertising Code of Conduct*?
- What research findings or data have informed the decision to advertise?
- What will success look like if the required outcomes are achieved?
- What has been done in the past to try and address this? What has been learnt from previous tactics?
- What will happen if the proposed advertising campaign isn't implemented?

None of the three departments were able to demonstrate how they had assessed their campaign against the Code, but during the audit they stated that their campaigns complied with the Code.

### *Let's change the way we look at speed campaign*

The speed campaign is a major campaign, requiring submission to the committee for approval. DTMR submitted all five stages to the committee and received the appropriate approval prior to the start of advertising.

DTMR submitted stages 1 (annual plan) and 2 (rationale) of the committee approval process, combining all campaigns under the Join the Drive strategy and not at the campaign level. They received an exemption from DPC to do this. When submitting stage 2, they used the template for Stage 3 (creative concept proposal). This meant that DTMR didn't submit a rationale to demonstrate the need for the individual campaign or a statement from their director-general that the campaign complied with the Code. Currently, their director-general (the accountable officer) does not sign off on creative materials to confirm compliance against the Code.

### First Home Owners' Grant campaign

Queensland Treasury's First Home Owners' Grant campaign did not adhere to the committee approval process as they bought and carried out advertising prior to receiving the committee's approval.

Queensland Treasury advertised (online and on radio) without approval. While this advertising was going on, Queensland Treasury continued to develop the First Home Owners' Grant campaign (including television commercials) and to guide it through the committee approval process. Queensland Treasury did not receive any exemptions to undertake advertising or communication activities prior to receiving the committee's approval.

Essentially, the department breached the guidelines by breaking the campaign into segments to go under the media placement spend threshold of \$100 000 without repercussion.

### Childhood immunisation campaign

The Department of Health identified the Childhood immunisation campaign as a major campaign, so it had to adhere to the committee approval process. The Department of Health submitted all five stages to the committee and received the appropriate approval.



The Department of Health has stated that the Code was a consideration throughout campaign development and implementation, but it did not demonstrate this within the documentation after its stage 2 submission to the committee. After we identified this gap in our audit, the Department of Health changed its process to ensure that its director-general will now certify compliance with the Code at every stage of the submission process for current and future campaigns.

# Appendices

<b>Appendix A—Full responses from agencies .....</b>	<b>53</b>
Comments received from Director-General, Department of the Premier and Cabinet ....	54
Comments received from Director-General, Department of Transport and Main Roads .....	59
Comments received from Director-General, Department of Environment and Heritage Protection.....	61
Comments received from Director-General, Department of Education and Training .....	62
Comments received from Director-General, Department of Justice and Attorney-General .....	63
Comments received from Under Treasurer, Queensland Treasury .....	64
Comments received from Director-General, Queensland Health.....	66
<b>Appendix B—Audit objectives and methods.....</b>	<b>69</b>
Audit objective .....	69
Reason for the audit .....	70
Performance audit approach .....	71
<b>Appendix C—Queensland Government Advertising Code of Conduct .....</b>	<b>73</b>
<b>Appendix D—Who does the Code apply to? .....</b>	<b>74</b>
<b>Appendix E—Campaigns assessed in detail.....</b>	<b>75</b>
Let's change the way we look at speed campaign.....	75
First Home Owners' Grant campaign.....	75
Childhood immunisation campaign .....	76

## Appendix A—Full responses from agencies

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As mandated in Section 64 of the *Auditor-General Act 2009*, the Queensland Audit Office gave a copy of this report with a request for comments to the 21 departments for comment.

The heads of these agencies are responsible for the accuracy, fairness and balance of their comments.

This appendix contains their detailed responses to our audit recommendations.

## Comments received from Director-General, Department of the Premier and Cabinet



Department of the  
**Premier and Cabinet**

For reply please quote: CS/AL – TF/17/4725 – DOC/17/63989  
Your reference:

23 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Close

### **Performance audit on government advertising**

Thank you for your letter of 3 May 2017 and the opportunity to provide comments on the report in government advertising prior to it being tabled in Parliament.

As the lead agency for the public service and with responsibility for whole-of-government communication, the Department of the Premier and Cabinet (DPC) invited all agencies to contribute to a consolidated response to the report.

The Queensland Government welcomes the opportunity to enhance its processes and supports your proposed recommendations.

Agencies have advised they have already taken action to ensure that Directors-General have appropriately authorised compliance to the Advertising Code of Conduct. This recommendation has also been implemented through the Government Advertising and Communication Committee (GACC).

Further, agencies holistically support opportunities to strengthen advertising campaign research and evaluation across government, both internally, through the GACC process and through guidance provided by my department.

Oversight of the implementation of the recommendations specifically focused on DPC will sit with my Communication Services team. The implementation of recommendations that impact on the structure and processes of GACC may in some cases require endorsement by Cabinet.

DPC, through the Heads of Communication network, will lead the implementation and monitoring of the department-focused recommendations.

1 William Street Brisbane  
PO Box 15185 City East  
Queensland 4002 Australia  
Telephone +61 7 3224 2111  
Facsimile +61 7 3229 2990  
Website [www.premiers.qld.gov.au](http://www.premiers.qld.gov.au)  
ABN 65 959 415 158

DPC would like to formally advise that the Queensland Government Handbook was updated in March 2017 to reflect the review of significant campaigns by the Cabinet Budget Review Committee and the change to the committee name.

Should you or your team require any further information, please contact Mr Alun Probert, Executive Director, Integrated Communication and Protocol by email at \_\_\_\_\_ or on telephone \_\_\_\_\_

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Stewart', with a long horizontal stroke extending to the right.

Dave Stewart  
**Director-General**

## Responses to recommendations



### Whole-of-Government response to audit recommendations

Recommendation	Agree / Disagree	Timeframe for implementation (Quarter and year)	Additional comments
We recommend that the Department of the Premier and Cabinet:			
1. diversifies the membership of the Government Advertising and Communication Committee to strengthen its independence (Chapter 2)	Agree	4th quarter 2017	<p>The Department of the Premier and Cabinet (DPC) will develop options to diversify the committee membership. This will include reviewing committee structures in other state and federal jurisdictions.</p> <p>The options will be considered by the Government Advertising and Communication Committee (GACC) prior to seeking approval from the Director-General, DPC.</p>
2. assesses the merits of extending the Government Advertising and Communication Committee's scope for 'noting' other public sector entities' expenditure on advertising to include those public sector entities that are not required to comply with the <i>Queensland Government Advertising Code of Conduct</i> (Chapter 3)	Agree	4th quarter 2017	<p>DPC will investigate the options for widening the scope of the committee to include other public sector entities where they are controlled by the state.</p> <p>The options will be considered by GACC prior to seeking approval from the Director-General, DPC.</p>
3. strengthens its oversight of government advertising and communication activities by <ul style="list-style-type: none"> <li>• developing guidance to assist agencies with planning, developing, implementing, evaluating, and funding campaign advertising and communication activities (Chapter 2)</li> <li>• updating policies to reflect the Government Advertising and Communication Committee approval process (Chapter 2)</li> <li>• updating the approval stages to ensure that compliance with the <i>Queensland Government Advertising Code of Conduct</i> is assessed after the final creative materials have been completed (Chapter 4)</li> <li>• analysing and confirming the appropriateness of quality assurance reports for advertising placement</li> </ul>	Agree	3rd quarter 2017	<p>DPC will commence the development of additional guidance material in consultation with departmental representatives. Research will also be undertaken to benchmark against materials provided by lead agencies in other jurisdictions.</p> <p>In regard to sub-point 2, the Cabinet Handbook was updated in March 2017 to reflect GACC and Cabinet Budget Review Committee (CBRC) process changes. Further documentation including updated committee terms of reference and GACC process documentation has been made available to departments online.</p> <p>In regard to the third sub-point – this recommendation has been implemented.</p> <p>In regard to the fourth sub-point – DPC has commenced discussions</p>

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activities (Chapter 3).			with the Queensland Government's master media agency and is reviewing the quality assurance reporting for media placement.
<p>4. enhances public reporting of total expenditure on advertising and communication activities on campaigns by including</p> <ul style="list-style-type: none"> <li>all public sector entities' expenditure on campaign advertising placement (Chapter 3)</li> <li>(for the 21 departments) all campaign costs associated with research and evaluation, production of creative materials, advertising placement, and other related items and services, in addition to expenditure on advertising placement (Chapter 3).</li> </ul>	Agree	4 <sup>th</sup> quarter 2017	DPC will investigate options for public reporting of media placement spend for public sector entities and campaign expenditure for the 21 core departments. This will include consultation with relevant public sector agencies and departments to develop a workable and accurate process. These options will be provided to the Director-General, DPC for approval.
We recommend that departments:			
<p>5. strengthen the evaluation of communication activities by preparing formal reports post campaigns which summarise results, cost-effectiveness of advertising mediums and insights into how the results inform future campaigns (Chapter 4)</p>	Agree	3 <sup>rd</sup> quarter 2017	<p>Many agencies have noted they have a formal evaluation reporting process in place and will continue this practice. There is support for sharing outcomes and maximising campaign success across government.</p> <p>As part of Recommendation 3 above, guidance and best-practice materials will be developed by DPC to strengthen campaign evaluation processes and promote best-practice. The GACC process will also be reviewed to enhance the quality of information required when submitting both campaign objectives and post-campaign evaluations.</p>
<p>6. ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the relevant authority (Director-General or equivalent) as compliant with the <i>Queensland Government Advertising Code of Conduct</i>, and that evidence of this certification is included in submissions (Chapter 4).</p>	Agree	completed	<p>Many agencies noted that Director-General (or delegate) approval was already part of their internal processes for GACC submissions.</p> <p>This recommendation was incorporated into the GACC process on 23 March 2017, the relevant forms updated and communicated to all departments through the Heads of Communication network.</p>



Please provide any further comment on the content of the report (please be as specific as possible – section, page, paragraph – regarding the section of the report you are providing comment on)

Section	Comments
1. Obtaining Cabinet Budget and Review Committee approval (page 23, paragraph 2)	This paragraph states that The Queensland Government Handbook reflects the advertising approvals process prior to March 2013. The Queensland Government Handbook was updated in March 2017 to reflect the review of significant campaigns by the Cabinet Budget Review Committee and the change to the committee name.



## Comments received from Director-General, Department of Transport and Main Roads



Queensland  
Government

Office of the  
Director-General

Department of  
Transport and Main Roads

Our ref: DG33733  
Your ref: 2016-9133P  
DBird – 3149 6023

15 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002



Dear Mr Close

Thank you for your letter of 3 May 2017 providing your proposed report to Parliament for the performance audit on government advertising, and for the opportunity to comment on your proposed report.

The Department of Transport and Main Roads (TMR) is supportive of the recommendations included in the report, and considers they are a practical way to address the report's findings. I am pleased to note that in preparing the proposed report, your auditors gave due consideration to TMR's feedback provided during the audit process.

As requested, please find enclosed our response to the report's recommendations. I am advised the Department of Premier and Cabinet will also provide a whole-of-government response to the recommendations.

If you require further information, please contact Mr Brett Owen, Chief Auditor, TMR, by telephone on \_\_\_\_\_ or email at \_\_\_\_\_.

I trust this information is of assistance.

Yours sincerely

A handwritten signature in dark ink that reads "Neil Scales".

Neil Scales  
Director-General  
Department of Transport and Main Roads

Enc (1)

1 William Street Brisbane  
GPO Box 1549 Brisbane  
Queensland 4001 Australia

Telephone +61 7 3066 7316  
Facsimile +61 7 3066 7122  
Website [www.tmr.qld.gov.au](http://www.tmr.qld.gov.au)  
ABN 39 407 690 291

## Responses to recommendations



**Department of Transport and Main Roads  
Government Advertising (Report No. XX: 2016–17)**

Response to recommendations provided by Director-General, Department of Transport and Main Roads on 23 May 2017.

Recommendation	Agree / Disagree	Timeframe for implementation (Quarter and year)	Additional comments
We recommend that departments:			
3. strengthen the evaluation of communication activities by preparing formal reports post campaigns which summarise results, cost-effectiveness of advertising mediums and insights into how the results inform future campaigns (Chapter 4)	Agree	Quarter 2, 2017	Since the audit commenced DTMR has implemented a formal communications evaluation report.  Further to this, DTMR is developing a specific template for post-campaign reporting that will include results, cost-effectiveness of advertising mediums, analysis against campaign objectives and insights into how the results inform future campaigns.
4. ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the relevant authority (Director-General or equivalent) as compliant with the <i>Queensland Government Advertising Code of Conduct</i> , and that evidence of this certification is included in submissions (Chapter 4).	Agree	Quarter 2, 2017	DTMR will implement a formal process to ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the Director-General as compliant with the <i>Queensland Government Advertising Code of Conduct</i> . Evidence of this certification will be included in submissions.

## Comments received from Director-General, Department of Environment and Heritage Protection



Ref CTS 12205/17

16 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Close

Thank you for your letter dated 3 May 2017 concerning the Queensland Audit Office's Parliamentary report on performance government advertising.

The Department of Environment and Heritage Protection is principally supportive of the recommendations included in the report and has provided this advice to the Department of the Premier and Cabinet as part of their whole-of-government response to the report.

Should your staff have any further enquiries, please ask them to contact Ms Nathalie Sengers, Director, Communication Services of the department on telephone

Yours sincerely



Jim Reeves  
Director-General

Page 1 of 1

Level 32  
1 William Street Brisbane  
GPO Box 2454 Brisbane  
Queensland 4001 Australia  
Telephone + 61 7 3330 6297  
Website [www.ehp.qld.gov.au](http://www.ehp.qld.gov.au)  
ABN 46 640 294 485

## Comments received from Director-General, Department of Education and Training



Office of the  
Director-General

Department of  
Education and  
Training



16 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Close

Thank you for your letter dated 3 May 2017 regarding the Queensland Audit Office (QAO) performance audit on government advertising.

Officers from the Department of Education and Training met with QAO officers in April this year to discuss the audit findings.

The Department of the Premier and Cabinet (DPC) is coordinating a whole-of-Government response to the advertising audit and officers from the Department have contributed to this. DPC has indicated this response will be provided directly to your office.

Should your officers wish to discuss the audit further, I invite them to contact Mr Chris Brandt, Director, Community Engagement and Partnerships, on telephone or by email at

Yours sincerely

A handwritten signature in black ink, appearing to read "Annette Whitehead".

**ANNETTE WHITEHEAD**  
Acting Director-General

Ref: 17/233747

Level 37 1WS  
1 William Street Brisbane  
Queensland 4000 Australia  
PO Box 15033 City East  
Queensland 4002 Australia  
Telephone +61 7 3034 4754  
Facsimile +61 7 3034 4769  
Website [www.det.qld.gov.au](http://www.det.qld.gov.au)  
ABN 78 337 613 647

## Comments received from Director-General, Department of Justice and Attorney-General



Department of Justice and Attorney-General  
Office of the Director-General

In reply please quote: 574529/1, 3759365

Your reference: 2016-9133P

17 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

1 William Street Brisbane  
GPO Box 149 Brisbane  
Queensland 4001 Australia  
Telephone 13 74 68 (13 QGOV)  
www.justice.qld.gov.au

ABN 13 846 673 994



Dear Mr Close

Thank you for your letter dated 3 May 2017 regarding the Queensland Audit Office's performance audit on Government advertising.

I am pleased that communication staff from the Department of Justice and Attorney-General (DJAG) assisted with the audit and can advise they are committed to implementing any enhancements to the system that may result from it.

In relation to the question about whether this agency agrees or disagrees with the audit recommendations, our responses and feedback have been provided to the Department of the Premier and Cabinet, which is coordinating a whole-of-Government response to the report. I am advised you will receive this consolidated Government response within the timeframe required by the *Auditor-General Act 2009*.

Should you require any further information, please contact Mr Paul Holmes, Director, Communication Services Branch, DJAG, on [redacted] or at: [redacted]

I trust this information is of assistance.

Yours sincerely

David Mackie  
Director-General

## Comments received from Under Treasurer, Queensland Treasury



Queensland Treasury

Our Ref: 01623-2017  
Your Ref: 2016-9133P

Mr A Close  
Acting Auditor-General of Queensland  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Close

Thank you for your letter dated 3 May 2017 regarding the Queensland Audit Office's performance audit on government advertising.

Queensland Treasury appreciates the opportunity to provide feedback and is supportive of the recommendations in the report.

Please find enclosed our response to the audit agreeing to the recommendations for departments. I also note the Department of the Premier and Cabinet is providing a whole-of-Government response to the report.

I'd like to thank you and the audit team for their work on this matter.

Yours sincerely

A handwritten signature in black ink that reads "Jim Murphy".

Jim Murphy  
Under Treasurer

Encl. 19/5/17

1 William Street  
GPO Box 611 Brisbane  
Queensland 4001 Australia  
Telephone +61 7 3035 1933  
Website [www.treasury.qld.gov.au](http://www.treasury.qld.gov.au)  
ABN 90 856 020 239

## Responses to recommendations



Queensland Treasury  
Government Advertising (Report No. XX: 2016–17)

Recommendation	Agree / Disagree	Timeframe for implementation (Quarter and year)	Additional comments
We recommend that departments:			
3. strengthen the evaluation of communication activities by preparing formal reports post campaigns which summarise results, cost-effectiveness of advertising mediums and insights into how the results inform future campaigns (Chapter 4)	Agree	End of 4 <sup>th</sup> quarter 2017	Treasury prepares post-campaign evaluation reports as per Stage 5 of the Government Advertising and Communication Committee process. In addition, Treasury will prepare post-campaign evaluation reports to enhance analysis.
4. ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the relevant authority (Director-General or equivalent) as compliant with the <i>Queensland Government Advertising Code of Conduct</i> , and that evidence of this certification is included in submissions (Chapter 4).	Agree	End of 4 <sup>th</sup> quarter 2017	Treasury recommends wording to reflect certification to be endorsed by Director-General or delegate.

## Comments received from Director-General, Queensland Health



Enquiries to: Mr Robert Hoge  
Executive Director  
Integrated Communications  
Branch  
Corporate Services Division  
Telephone: 0427 435 592  
File Ref: C-ECTF-17/2473

23 MAY 2017

Mr Anthony Close  
Acting Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Close

Thank you for your letter dated 3 May 2017, regarding the performance audit on Government advertising, and the opportunity to provide feedback on the proposed report to Parliament.

I note your recommendations directed at departments regarding evaluation of communication activities and certifying that campaign materials meet the *Queensland Government Advertising Code of Conduct* (the Code). Specific feedback on the recommendations is included on the attached table supplied by Queensland Audit Office.

The Department of Health agrees with these recommendations and is currently working with an external agency and Department of Premier and Cabinet to further improve its evaluation and reporting processes, including developing a detailed and consistent reporting template to be used from the 2017/18 financial year.

The Department of Health has also begun reviewing policies and processes relating to evaluation of advertising and communication activities.

As outlined in your report, the Department of Health has already implemented a process to address evidentiary requirements to demonstrate that I have approved campaign materials prior to submission to the Government Advertising and Communication Committee, including adherence to the Code.

The Department of Health agrees with the recommendations outlined for the Department of Premier and Cabinet, and specifically welcomes further discussion around the definition of "communication activities" with relation to the scope of the Government Advertising and Communication Committee, ensuring that it best reflects modern communications.

**Office**  
Level 37  
1 William Street  
BRISBANE QLD 4000

**Postal**  
GPO Box 48  
BRISBANE QLD 4001

**Phone**  
3708 5990

**Email:**  
DG\_Correspondence@health.qld.gov.au



Should you require further information, the Department of Health's contact is Mr Robert Hoge, Executive Director, Integrated Communications Branch, on telephone

Yours sincerely



**Michael Walsh**  
Director-General  
Queensland Health

## Responses to recommendations

### Response to the Queensland Audit Office performance audit into Queensland Government Advertising

Department name: Department of Health

Recommendation	Agree / Disagree	Timeframe for implementation (Quarter and year)	Comments
We recommend that departments:			
3. strengthen the evaluation of communication activities by preparing formal reports post campaigns which summarise results, cost-effectiveness of advertising mediums and insights into how the results inform future campaigns (Chapter 4)	Agree	By June 2017 – scoping  By September 2017 - implementation	<p>Department of Health is currently working with an external agency and Department of Premier and Cabinet to further improve its evaluation and reporting, including developing a detailed and consistent reporting template to be used from FY17/18.</p> <p>Department of Health has begun reviewing all policies and processes relating to evaluation of advertising and communication activities.</p> <p>This process may be subject to further changes depending on whole-of-government actions.</p> <p>The Department of Health accepts the finding in the report that a comprehensive evaluation report was not made available as part of the GACC 5 process. The Department notes however, the report acknowledges that beyond the scope of the GACC 5 summary, the department undertook meaningful evaluation that optimised the campaign.</p>
4. ensure that campaign materials submitted to the Government Advertising and Communication Committee have been certified by the relevant authority (Director-General or equivalent) as compliant with the <i>Queensland Government Advertising Code of Conduct</i> , and that evidence of this certification is included in submissions (Chapter 4).	Agree	Completed	<p>As outlined in the report, the Department of Health has already implemented a process whereby the cover sheet attached to all GACC templates incorporates the Code of Conduct and the Director-General approves adherence to the Code.</p> <p>This process may be subject to further changes depending on whole-of-government actions.</p>

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## Appendix B—Audit objectives and methods

### Audit objective

The objectives of the audit are to assess the economy of purchasing of government advertising, the effectiveness of a selection of government advertising campaigns, and the administration of applicable governance frameworks.

The audit addresses the objectives through the lines of inquiry and criteria as set out in Figure B1.

**Figure B1**  
Audit scope

Line of inquiry		Criteria	
<b>Economy of purchasing</b>			
1	There is a system in place to determine the appropriate quality and quantity of advertising.	1.1	There is an assessment system for prioritising advertising campaigns and it is applied consistently.
2	Departments' expenditure for government advertising activities is transparent and accountable.	2.1	Publicly reported expenditure on government advertising is complete and accurate.
		2.2	Departments adhere to government advertising budgets and can demonstrate value for money.
<b>Campaign effectiveness</b>			
3	Campaign advertising is effective and complies with relevant governance frameworks.	3.1	Campaign advertising meets the campaign need and delivers on its stated objectives.
		3.2	Campaign advertising complies with the relevant governance frameworks.
<b>Administration of the Queensland Government Advertising Code of Conduct</b>			
4	The <i>Queensland Government Advertising Code of Conduct</i> is applied appropriately and its administration is effective.	4.1	Governance arrangements ensure that the <i>Queensland Government Advertising Code of Conduct</i> is applied appropriately.
		4.2	Appropriate governance arrangements are designed for effective oversight and administration of campaign advertising.
		4.3	Advertising policies, guidelines, and practices reflect current better practice approaches.

Source: Queensland Audit Office.

## Limitations

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The government advertising campaigns assessed under line of inquiry 4 were limited to those which the *Queensland Government Advertising Code of Conduct* (the Code) and the Government Advertising and Communication Committee (the committee) approval process apply.

## Reason for the audit

Governments use advertising and communication channels as a means to inform the public about a variety of matters, including:

- items of public interest
- the rollout of new policies and programs
- other critical community information.

These activities can be far-reaching and use a variety of media including electronic, print, and online channels to deliver messages.

Government advertising is a powerful tool for conveying messages that have the potential to impact on public opinion. It is important that departments manage their advertising well by using it for legitimate purposes where the associated expenditure of public funds is warranted.

As noted by the Australian National Audit Office (ANAO) in the *Administration of Government Advertising Arrangements: August 2011–2013*:

While campaign advertising is a legitimate and accepted element of government communication and information strategies, there have long been concerns that governments may use, or may be perceived to use, taxpayer funds to gain political advantage, rather than to meet the genuine information needs of citizens.

## Queensland Government Advertising Code of Conduct

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The Department of the Premier and Cabinet (DPC) is responsible for administering the Code, which sets the basis for departments' development of their advertising and communication campaigns. It requires departments to be accountable and transparent about their campaigns. It also requires that their advertising is outcome focused and avoids political bias.

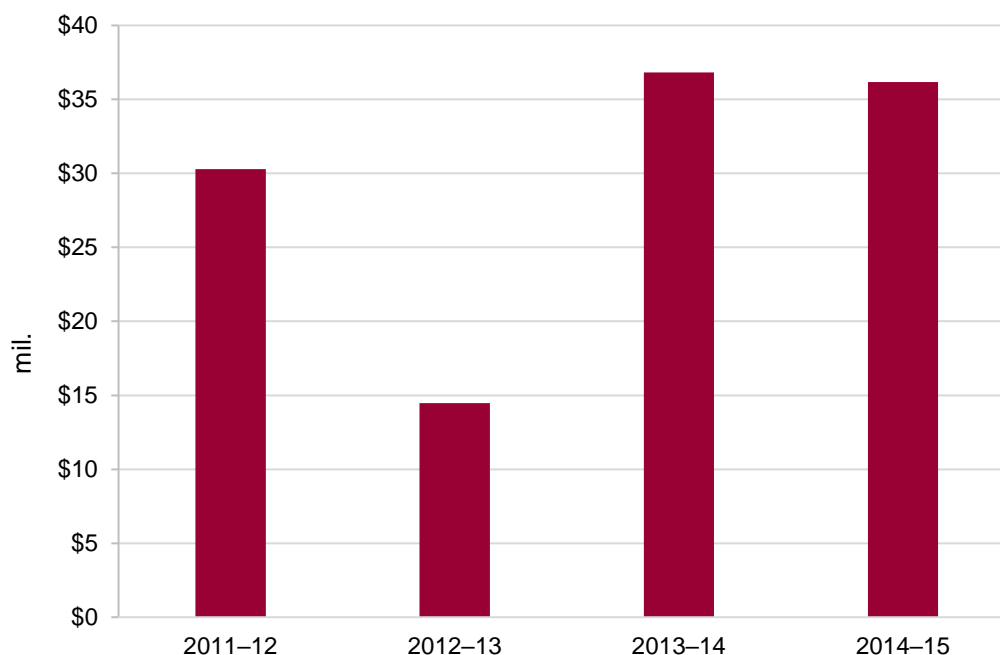
## Funds spent on advertising

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The Queensland Government's Open Data initiative (which provides online access to government data) aims to increase the transparency of government, its processes and decision-making. It includes data provided by DPC relating to whole-of-government expenditure on government advertising, including advertising placement. (Queensland public sector entities pay to place advertisements in the market, for example, on television, in magazines or on billboards). For the 2014–15 financial year, DPC publicly reported that government departments spent \$32.58 million on campaign advertising.

Figure B2 shows reported expenditure on advertising placement for 2011–2012 to 2014–2015.

**Figure B2**  
DPC-reported expenditure on advertising placement



Notes: Expenditure includes both campaign and non-campaign expenditure for departments. (Exclusive of Goods and Services Tax (GST)) Non-campaign services can include information on recruitment, training courses, auctions, tenders, notices, and general announcements. They are outside the scope of this audit.

Source: DPC website, accessed 28 September 2016.

## Campaign advertising

For the purposes of this audit, campaign advertising is advertising that is developed to raise awareness, educate, and generate attitudinal and behavioural change in relation to services, products, projects, laws or policies. It involves strategic planning, the development of creative materials, and the evaluation of creative concepts, media exposure and outcomes.

This audit examines the economy of purchasing government advertising, the effectiveness of a selection of advertising campaigns and the administration of applicable governance frameworks.

## Performance audit approach

We conducted this audit in accordance with the Auditor-General of Queensland Auditing standards, which incorporate the Australian Auditing and Assurance Standards.

We conducted it between August 2016 and December 2016. The audit consisted of:

- interviews and consultation with officials from
  - Department of the Premier and Cabinet
  - Department of Aboriginal and Torres Strait Islander Partnerships
  - Department of Agriculture and Fisheries
  - Department of Communities, Child Safety and Disability Services
  - Department of Education and Training
  - Department of Energy and Water Supply
  - Department of Environment and Heritage Protection
  - Department of Health
  - Department of Housing and Public Works
  - Department of Infrastructure, Local Government and Planning
  - Department of Justice and Attorney-General
  - Department of National Parks, Sport and Racing
  - Department of Natural Resources and Mines
  - Department of Science, Information Technology and Innovation
  - Department of State Development
  - Department of Transport and Main Roads
  - Department of Tourism, Major Events, Small Business and the Commonwealth Games
  - Public Safety Business Agency
  - Tourism and Events Queensland
  - Queensland Fire and Emergency Services
  - Queensland Police Service
  - Queensland Treasury
- analysis of documents, including Cabinet submissions, policies, plans, reports, guidelines and manuals
- analysis of data provided by departments on advertising and communication expenditure.

## Appendix C—Queensland Government Advertising Code of Conduct

### Queensland Government Advertising Code of Conduct

As the basis for the development of communication campaigns, Queensland Government departments must observe an Advertising Code of Conduct (the Code).

Campaigns should be planned, developed, implemented, funded, and evaluated in accordance with the Advertising Code of Conduct, taking into account the following:

1. There must be a direct and obvious benefit to the people of Queensland.
  2. Advertising must be directed at, and focused on, the sections of the community to which it is relevant. It must have an educative or informative role dealing with something that is new or about which the community is unaware or unclear.
  3. The clear benefit from any Government advertising must be in its informative or educative role so that there can be no perception of any party-political benefit.
  4. Advertising must be presented in objective language and be free of political argument.
  5. Advertising must not try to foster a positive impression of a particular political party or promote party-political interests.
  6. Advertising must not:
    - (a) mention the party in Government by name;
    - (b) directly attack or scorn the views, policies or action of others such as the policies and opinions of the other political groups;
    - (c) include party political slogans or images;
    - (d) be designed to influence public support for a political party, a candidate for election or a Member of Parliament; or
    - (e) refer or link to the websites of politicians or political parties.
  7. There should be no advertising within six months of the scheduled date for an election unless there is an urgent emerging issue.
  8. Money designated for service delivery in a State Budget must not be diverted to the cost of advertising.
  9. In relation to Point 7, it is not practical or desirable to effectively prohibit all advertising in the lead-up to an election. To assist in determining which advertising should cease, the following information is provided:
    - (a) Normal advertising associated with departmental programs, initiatives or projects is still possible so that such activities are not curtailed (e.g. community consultation or communicating project specific information).
    - (b) Social education information (e.g. road safety campaigns, health campaigns, any emergency service information) is still allowed.
    - (c) Whole-of-government campaigns, which usually focus on particular initiatives of the Government, need to be carefully considered in the six month period.

Any such issue would need to be pre-approved by relevant officers within the Department of the Premier and Cabinet who advise on caretaker conventions. It should be noted in relation to (c), that the code does provide for urgent emerging issues (e.g. new laws) to be addressed through advertising if required.
- The above Code applies to print advertising (e.g. Newspapers, magazines and inserts), electronic advertising (e.g. television, radio, and internet), outdoor media (e.g. Billboards, bus/taxi advertisements) and all other types of media services covered under the Queensland Government master media advertising placement services standing offer arrangement.
- Additionally, brochures, newsletters, direct mail outs, and other like forms of communications must conform to the above conditions set down for advertising.

*Source: Queensland Government Advertising Code of Conduct.*

## Appendix D—Who does the Code apply to?

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The following 21 departments are those that are required (by the Department of the Premier and Cabinet) to comply with the *Queensland Government Advertising Code of Conduct* (the Code):

- Department of Aboriginal and Torres Strait Islander Partnerships
- Department of Agriculture and Fisheries
- Department of Communities, Child Safety and Disability Services
- Department of Education and Training
- Department of Energy and Water Supply
- Department of Environment and Heritage Protection
- Department of Health
- Department of Housing and Public Works
- Department of Infrastructure, Local Government and Planning
- Department of Justice and Attorney-General
- Department of National Parks, Sport and Racing
- Department of Natural Resources and Mines
- Department of the Premier and Cabinet
- Department of Science, Information Technology and Innovation
- Department of State Development
- Department of Tourism, Events, Small Business and the Commonwealth Games
- Department of Transport and Main Roads
- Public Service Commission
- Queensland Fire and Emergency Services
- Queensland Police Service
- Queensland Treasury.

Other Queensland public sector entities, such as statutory bodies and government owned corporations, are encouraged (but not required) to abide by the principles of the Code.

Economic Development Queensland is exempt from the Government Advertising and Communication Committee approval process. It is a commercialised business unit within the Department of Infrastructure, Local Government and Planning. Its operations are funded through the sale of land in its residential, urban and industrial projects, under the *Economic Development Act 2012*. Advertising costs for each development project are approved by the Economic Development Board as part of the overall business plan for each project, with budgets set at the property development industry standard. The Government Advertising and Communication Committee (20 May 2013 and 16 October 2015) has granted an exemption on this basis.



## Appendix E—Campaigns assessed in detail

### *Let's change the way we look at speed* campaign

The Department of Transport and Main Roads (DTMR) report that they are very concerned that speeding is seen as socially accepted behaviour. 2015 survey results conducted by DTMR showed that 94 per cent of people claim they engage in this behaviour at least occasionally and 49 per cent state they speed on most trips.

Approval for this campaign through the Government Advertising and Communication Committee (the committee) took a total of four weeks—from the submission of stage 3 (creative concept proposal) to the approval of stage 4 (final creative materials). This quick turnaround was due to a streamlined process for the overarching Join the Drive to Save Lives (Join the Drive) campaign.

**Figure E1**  
Campaign summary for *Let's change the way we look at speed*

Campaign summary	
Objectives	The overall objectives of the campaign were to: <ul style="list-style-type: none"> <li>▪ encourage Queenslanders to believe that speeding at low levels is dangerous</li> <li>▪ increase community participation in the Join the Drive social media, website and/or other avenues</li> <li>▪ see a reduction in (self-reported) speeding behaviour on Queensland roads in the longer term, as part of the Join the Drive social change strategy.</li> </ul>
Timing	The campaign ran for two weeks from 20 March 2016–2 May 2016.
Target audiences	Road users who intentionally speed at low–mid levels, believing they are 'safe speeders'. This is likely to be men between 17 and 39 years of age and those who engage in risky behaviour.
Media channels	<ul style="list-style-type: none"> <li>▪ Television</li> <li>▪ Digital</li> <li>▪ Outdoor billboards</li> <li>▪ Social media</li> <li>▪ Cinema</li> <li>▪ Bus-back</li> <li>▪ Radio</li> <li>▪ Petrol pump TV</li> </ul>
Total planned budget (exclusive of Goods and Services Tax (GST))	\$1 500 000
Media and other spend (exclusive of GST)	Advertising placement: \$1 085 244 Research and evaluation: \$36 410; production: \$613 470; other activities: \$23 861
Total cost (exclusive of GST)	\$1 758 985

Source: Queensland Audit Office from Department of Transport and Main Roads' documentation.

### First Home Owners' Grant campaign

The First Home Owners' Grant campaign is a Queensland Government initiative designed to help people buy their new first home. As part of the 2016–17 budget announcement, from 1 July 2016 to 30 June 2017, the grant has been boosted by \$5 000, making it worth \$20 000 to new first home owners.

**Figure E2**  
**Campaign summary for the First Home Owners' Grant**

Campaign summary		
Objectives	The overall objective of the campaign is to increase take-up of the First Home Owners' Grant and increase activity in the construction sector.	
Timing	The campaign is still in the market. It first appeared in the market in August 2016 (for approximately three weeks).	
Target audiences	Primary audience: <ul style="list-style-type: none"> <li>▪ first home buyers</li> </ul>	Secondary audiences: <ul style="list-style-type: none"> <li>▪ builders</li> <li>▪ real estate agents</li> <li>▪ finance brokers and banks</li> </ul>
Media channels	August 2016 <ul style="list-style-type: none"> <li>▪ Online</li> <li>▪ Radio</li> <li>▪ Social media</li> </ul>	January–June 2017 <ul style="list-style-type: none"> <li>▪ Television</li> <li>▪ Cinema</li> <li>▪ Radio</li> <li>▪ Print</li> <li>▪ Online</li> <li>▪ Social media</li> </ul>
Total planned budget (exclusive of GST)	Approximately \$1 380 267	
Media and other spend (exclusive of GST)	Advertising placement (September 2016): \$92 470 Production: \$45 238	
Total cost (exclusive of GST)	Total to date (September 2016): \$137 708	

Note: The approximate figures are due to Queensland Treasury not having complete records of the total advertising campaign costs available for this audit. The figures include the advertising and communication activity that occurred in September 2016.

Source: Queensland Audit Office from Queensland Treasury's documentation.

## Childhood immunisation campaign

On 6 November 2015, the Queensland Government amended the *Public Health Act 2005*. Changes to legislation took effect from 1 January 2016. The amendments give approved early childhood education and care (ECEC) services the power to exercise discretion regarding the enrolment and attendance of children who are not up to date with their immunisations.

The tight timeframes due to the effective legislation date in December 2015 meant that several stages for this campaign were approved out of session. The committee approval process took a total of 14 and a half weeks from the stage 2 (rationale) submission to the approval of stage 4 (final creative materials).

**Figure E3**  
**Campaign summary for Childhood immunisation**

Campaign summary			
Objectives	Overall, the primary objective was to increase adherence to the childhood immunisation schedule.		
Timing	The campaign ran for seven months from December 2015–June 2016.		
Target audiences	<table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top; width: 50%;"> <b>Primary audiences:</b> <ul style="list-style-type: none"> <li>▪ all target audience groups</li> <li>▪ parents of children aged zero–five</li> <li>▪ Aboriginal and Torres Strait Islander and culturally and linguistically diverse parents of children aged zero–five</li> </ul> </td> <td style="vertical-align: top; width: 50%;"> <b>Secondary audiences:</b> <ul style="list-style-type: none"> <li>▪ pregnant women</li> <li>▪ parents of children aged 12–14</li> <li>▪ adults</li> <li>▪ general practitioners</li> <li>▪ immunisation service providers</li> <li>▪ health workers</li> <li>▪ ECEC services</li> <li>▪ pro-vaccination advocacy and media groups</li> </ul> </td> </tr> </table>	<b>Primary audiences:</b> <ul style="list-style-type: none"> <li>▪ all target audience groups</li> <li>▪ parents of children aged zero–five</li> <li>▪ Aboriginal and Torres Strait Islander and culturally and linguistically diverse parents of children aged zero–five</li> </ul>	<b>Secondary audiences:</b> <ul style="list-style-type: none"> <li>▪ pregnant women</li> <li>▪ parents of children aged 12–14</li> <li>▪ adults</li> <li>▪ general practitioners</li> <li>▪ immunisation service providers</li> <li>▪ health workers</li> <li>▪ ECEC services</li> <li>▪ pro-vaccination advocacy and media groups</li> </ul>
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Media channels	<table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> <li>▪ Digital</li> <li>▪ Outdoor</li> <li>▪ Print</li> </ul> </td> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> <li>▪ Radio</li> <li>▪ Social media</li> <li>▪ Television</li> </ul> </td> </tr> </table>	<ul style="list-style-type: none"> <li>▪ Digital</li> <li>▪ Outdoor</li> <li>▪ Print</li> </ul>	<ul style="list-style-type: none"> <li>▪ Radio</li> <li>▪ Social media</li> <li>▪ Television</li> </ul>
<ul style="list-style-type: none"> <li>▪ Digital</li> <li>▪ Outdoor</li> <li>▪ Print</li> </ul>	<ul style="list-style-type: none"> <li>▪ Radio</li> <li>▪ Social media</li> <li>▪ Television</li> </ul>		
Total planned budget (exclusive of GST)	\$2 600 000		
Media and other spend (exclusive of GST)	Advertising placement: \$1 899 949 Research and evaluation: \$99 970; production: \$351 058; other activities: \$62 427		
Total cost (exclusive of GST)	\$2 413 404		

Source: Queensland Audit Office from Department of Health's documentation.

# Auditor-General reports to parliament

## Reports tabled in 2016–17

Number	Title	Date tabled in Legislative Assembly
1.	Strategic procurement	September 2016
2.	Forecasting long-term sustainability of local government	October 2016
3.	Follow-up: Monitoring and reporting performance	November 2016
4.	Criminal justice data—prison sentences	November 2016
5.	Energy: 2015–16 results of financial audits	November 2016
6.	Rail and ports: 2015–16 results of financial audits	November 2016
7.	Water: 2015–16 results of financial audits	December 2016
8.	Queensland state government: 2015–16 results of financial audits	December 2016
9.	Hospital and Health Services: 2015–16 results of financial audits	January 2017
10.	Efficient and effective use of high value medical equipment	February 2017
11.	Audit of Aurukun school partnership arrangement	February 2017
12.	Biosecurity Queensland's management of agricultural pests and diseases	March 2017
13.	Local government entities: 2015–16 results of financial audits	April 2017
14.	Criminal justice data—reliability and integration of data	April 2017
15.	Managing the performance of teachers in Queensland state schools	April 2017
16.	Government advertising	May 2017

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