

## **Democratic Audit of Australia**

### **Submission to the Parliament of Victoria's Electoral Matters Committee Inquiry into Political Donations and Disclosure**

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#### **Introduction**

The Democratic Audit of Australia has made a conscious decision to provide the Electoral Matters Committee with a relatively brief submission consisting mainly of recommendations. This is not out of any disrespect for the committee or because we believe the issue to be of minor significance—quite the contrary, it is one of the most important and vexing issues on the Australian political agenda. Legislation on funding and disclosure and tax deductibility of donations is currently before the federal parliament and a Green Paper on political finance is to be issued this month. A Committee of the NSW Legislative Council has reported on the matter and two Bills dealing with political donations and spending were introduced to the Legislative Assembly on 18 June 2008. Naturally we welcome this activity, but it does mean that a whole range of funding and disclosure questions are in a state of flux. While we cannot predict which regime will find favour with whom, we are encouraged by the decision of the Special Minister of State, Senator John Faulkner, to establish a consultation process with relevant state and territory ministers and this is reflected in some of our recommendations.

**Recommendation 1.** Uniformity of disclosure regimes is desirable and that this can be achieved by the establishment of a single regulatory agency covering federal, state and territory elections.

**Recommendation 2.** That, in order to achieve maximum transparency of the original source of political donations before polling day, an internet-based

accounting system, similar to that operated by the NY City Campaign Finance Board be implemented. (See Appendix A).

**Recommendation 3.** That 'donations' include money, gifts, loans and charges levied for attendance at dinners and such functions beyond actual reasonable costs.

**Recommendation 4.** That funding and disclosure requirements apply to political parties, candidates and third parties.

**Recommendation 5.** That political donations be permitted only from Australian citizens or permanent residents.

**Recommendation 6.** That corporations or trade unions not be permitted to make political donations and that deterrent penalties against 'smurfing' be adopted.

**Recommendation 7.** Some trade unions have been 'affiliated' to state branches of the Australian Labor Party for over a century and pay capitation fees to that party. We recommend that these funds be quarantined from the category of political donations for election campaigns and that state branches of the ALP provide annual, audited accounts to the electoral funding authority confirming that capitation fees have not been spent on election campaigning.

**Recommendation 8.** That all donations in excess of \$50 be declared.

**Recommendation 9.** That donations to individual parties, candidates and entities be capped at \$2 200 per calendar year, as is the case in Canada.

**Recommendation 10.** That commercial broadcasters be required to charge political parties, candidates and entities no more than the minimum rate of advertising.

**Recommendation 11.** That the federal parliament be encouraged to amend the Broadcasting Act to require commercial broadcasters to allocate ‘free time’ to registered political parties to advertise during the electoral campaign period. (For Victoria, the ‘campaign period’ should be the four weeks prior to the fixed polling day)

**Recommendation 12.** That in order to curb the current arms race in spending on political advertising, the federal parliament be encouraged to reduce such spending by placing limits on electronic advertising in a manner consistent with the constitutional ‘freedom of expression’ principle identified by the High Court in 1992.

**Recommendation 13.** That the current public funding regime be amended to permit political parties and candidates to receive matching grants for funds raised before polling day, subject to a maximum amount. Parties and candidates receiving in excess of 4% of the vote should continue to receive funding per vote but at an adjusted rate.

**Recommendation 14.** That spending of public funds on election campaigns be disclosed in a timely manner and that the components of that expenditure—electronic and print advertising, direct mail etc.—be itemized.

**Recommendation 15.** While not an issue covered by the *Victorian Electoral Act 2002*, we recommend that the Victorian government mirror the changes to the monitoring and regulation of ‘government advertising’ announced by the Special Minister of State, Senator John Faulkner, and the Minister for Finance and Deregulation, Lindsay Tanner, on 2 July 2008 (See Appendix B).

**APPENDIX A****National Interest**

on ABC Radio National

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**The best democracy money can't buy**

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11 April 2008

Good thing Australia has campaign finance laws: by February next year we'll find out who donated to whom at the 2007 federal election. That's right: 15 months between donation and disclosure - and even then, only amounts of \$10,500 or more will be revealed. Minister John Faulkner has promised reform - but how far is he prepared to go? The Rudd cabinet may consider a study tour to New York city, where all political donations appear - almost instantaneously - on line, for the world to see. And the Canadians also know a thing or two about money, politics and transparency.

Transcript

**Transcript**

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This transcript was typed from a recording of the program. The ABC cannot guarantee its complete accuracy because of the possibility of mishearing and occasional difficulty in identifying speakers.

**Peter Mares:** Under current laws, it won't be until February next year that we find out who donated what to whom at the 2007 federal election. And even then, only donations above \$10,500 will be disclosed. It seems an awfully long time to wait for a paltry bit of information.

Special Minister of State, Senator John Faulkner, has promised change. He plans to bring the threshold at which donations are declared back down to around \$1,000. And declarations will be made every six months, rather than annually - as is the case now.

But these are modest reforms. And the minister is also instigating a debate about campaign finance more generally - a debate that could lead to a bigger legislative overhaul.

Unfortunately, Senator Faulkner has declined our invitations to discuss this issue in The National Interest - at least until a promised green paper is published in July.

We think that's too long to wait, especially given the scandals rocking New South Wales, where developers have poured money into Labor coffers, raising suspicions that they're buying favourable planning outcomes. The problems have so damaged Morris Iemma's government that he wants to get rid of political donations altogether and fund election campaigns entirely from the public purse.

The issue of campaign finance is also likely to be chewed over at the big 2020 Summit in Canberra next weekend. So, here at the National Interest we thought we'd help get discussions started by looking at how they do things in two jurisdictions overseas: New York City and Canada.

New York City not only has strict limits on the amount of money that can be given to candidates

campaigning for public office, but donations also have to be declared before the polls and are made public immediately on a searchable, online database. So, you can find out who's financing a political campaign before you cast your ballot. Now, there's a novel idea!

Earlier this week I spoke to Amy Loprest, Executive Director of the New York City Campaign Finance Board, who told me that the Board was set up to counter corruption.

**Amy Loprest:** The Board is now in its 20th year. In the late 1980s New York City had a series of scandals that involved bribe-taking and several high-level city officials and the mayor at the time, Mayor Ed Koch, fought to reform the political culture in New York City. And one of the things that was done was to create the Campaign Finance Board, which is a voluntary program that provides public matching funds for candidates who are running for city office.

**Peter Mares:** As well as providing matching funds, though - and we'll come to that in a moment - you also monitor all donations to political candidates.

**Amy Loprest:** That's correct. We monitor the contributions and spending, and require disclosure for all candidates who are running for city office.

**Peter Mares:** And you describe the program as 'voluntary', but it's not voluntary as far as disclosure goes: everyone who runs for office has to disclose their donations...

**Amy Loprest:** Well, Peter, that's a relatively new phenomenon. The law was changed in late 2004 to require disclosure from all candidates.

**Peter Mares:** And there are restrictions on who can donate, as well...

**Amy Loprest:** That is true. You cannot get contributions from corporations, limited liability companies, limited liability partnerships, or any other kind of partnership. In addition, there are contribution limits on donations.

**Peter Mares:** What's the maximum donation someone can make to a political candidate?

**Amy Loprest:** It varies by office.

**Peter Mares:** Let's say for the mayor.

**Amy Loprest:** For the mayor the contribution limit is US\$4,950. Recently, in July, the City Council and the mayor passed a new legislation that puts very serious restrictions on the contributions of those people and entities who do business with the City of New York. For instance, if you were doing business with the City of New York your contribution when it would be reduced from that US\$4,950 to US\$400.

**Peter Mares:** So, if I had a cleaning contract for example for New York City buildings, then I could only donate up to US\$400.

**Amy Loprest:** That is correct.

**Peter Mares:** What about trade unions, because that's a big issue here. Can trade unions donate funds?

**Amy Loprest:** Yes, they can, but they're subject to the same contribution limits as anyone else.

**Peter Mares:** So, a maximum of that US\$4,950?

**Amy Loprest:** Yes.

**Peter Mares:** How soon after making a donation do I have to declare it? How soon do I have to declare that I've donated \$US4,000 to a particular candidate's campaign?

**Amy Loprest:** Well, our elections run in four-year cycles, so in the first three years of those election cycles candidates disclose their finances every six months, on January 15th, and then again on July 15th. During the year of the election the disclosure becomes more frequent. First once a quarter in January, March and May, and then as it gets closer to our elections, which are in September and November, the candidates file their disclosure statements about once a month.

**Peter Mares:** And how soon, as a member of the public, can I get that information, then?

**Amy Loprest:** We have electronic disclosure of your finances, through a software that the New York City Campaign Finance Board developed and provides to candidates, and so they file their disclosure statements electronically and they are almost instantaneously available on our website, both in a summary form and in a searchable database.

**Peter Mares:** So, that means that before I go to the polls to cast my ballot I'll be able to look and see who's got money from whom...

**Amy Loprest:** Yes and where the money that they've collected was spent.

**Peter Mares:** So, you also look at how the campaign funds are used...

**Amy Loprest:** Yes.

**Peter Mares:** And are there restrictions on how much can be spent on a political campaign?

**Amy Loprest:** For people who agree to get public financing there are limits on their spending. For everyone else there's not, because of the US Constitution and the way the Supreme Court has interpreted the Constitution.

**Peter Mares:** So, this is where the 'voluntary' comes in. If you sign up for the program then you agree to limit your campaign spending; if you don't, then you can spend as much as you like...

**Amy Loprest:** Yes.

**Peter Mares:** Because I think your current mayor, Mayor Bloomberg... He obviously is a very rich man as the founder of the Bloomberg News Service... He had plenty of money to spend on his campaign and I don't think he signed up for any limits.

**Amy Loprest:** No, he didn't. He spent about US\$75 million on his first campaign for mayor.

**Peter Mares:** And I presume that was a fair bit more than anyone else...

**Amy Loprest:** Yes. So just to be clear, the spending limits for mayor are about \$US6 million, and that is a limit for the primary election and then a candidate who goes on and is in our general election can spend another US\$6 million.

**Peter Mares:** You also mentioned that the Campaign Finance Board provides public funds for candidates. How does that work?

**Amy Loprest:** Well, in New York City the way we do that is we provide the public funds on a matching basis. So, for every dollar of contributions that you receive from an individual New York City resident you can receive US\$6 in matching funds up to each contribution of US\$175. So, if I collected a US\$175 contribution from an individual, I could receive up to US\$1,050 in public matching funds.

**Peter Mares:** And what's the rationale behind that 6-1 ratio of private donations and matching public funds?

**Amy Loprest:** One of the goals of the Campaign Finance Program is to increase the role of New York City residents in their electoral process and by matching generously small donations you encourage people who otherwise don't have the means to make large contributions to make a contribution that is meaningful to a candidate.

**Peter Mares:** What's been the effect of this?

**Amy Loprest:** I think that there have been more candidates running for office. Certainly many people who have run for office in New York City over the past 20 years have said that they would not have been able to do it without the public matching funds, that they would never have had the support or the ability to raise the money that they would need to be a serious candidate without the public matching funds. And so the participation in the electoral process - as far as the number of candidates [goes] - has been increased.

**Peter Mares:** I guess the overall effect, or the overall aim, is to create more level playing-field, but doesn't the Michael Bloomberg example really blow that out of the water? I mean, the fact that if you're a wealthy individual there can be no limits on your campaign spending... It doesn't really work, does it?

**Amy Loprest:** I think that you can't have an absolute level playing-field, but what you can do is

provide the candidates who need the public funding enough money so that they can make their voice heard and get their message out. So, I think that certainly providing the candidates with the public funds in a sufficient volume lets them get their message out and you can't ever hope to have a perfectly level playing-field.

**Peter Mares:** If Australia was to adopt similar types of laws to those in New York, would the New York City Finance Board be willing to share your very clever software you've developed?

**Amy Loprest:** Yes. As a matter of fact we have actually done some work with... I've spoken to people at the Australian Electoral Commission in the past and shared our software with them and also the government of New South Wales. So, we've already started the process.

**Peter Mares:** Amy Loprest, thank-you for joining me in The National Interest.

**Amy Loprest:** You're welcome.

**Peter Mares:** Amy Loprest, Executive Director of the New York City Campaign Finance Board.

And there you have it: the software is available to publish details of political donations online before we cast our ballots at elections. Not only that, it's been offered to officials from the Australian Electoral Commission and the government of New South Wales. Senator Faulkner, I hope you're listening!

The New York system doesn't solve all the problems of campaign finance and I doubt there is a silver bullet. Money, like water, finds its own level and will seep through any crack in the system. But New York offers a much greater level of disclosure than our own system.

And Canada, too, has much tougher campaign finance laws than Australia.

One person who was listening to our last interview is political scientist Fred Fletcher, Professor Emeritus at York University in Toronto.

Professor Fletcher, welcome to the National Interest on ABC Radio National.

**Fred Fletcher:** Thank you, Peter.

**Peter Mares:** I should point out that you've also spent quite a bit of time in Australia, so you're familiar with Australia's electoral system, too.

**Fred Fletcher:** Yes, I was happy to be in Melbourne in the run-up to the last election.

**Peter Mares:** Now, Canada - like New York, as I understand it - puts a cap on the size of political donations.

**Fred Fletcher:** That's correct. It came into force in 2004.



**Peter Mares:** And what is the size of the cap?

**Fred Fletcher:** Individuals are allowed to donate C\$1,100 per year to each registered party and another C\$1,100 to an electoral district association.

**Peter Mares:** And are corporations and trade unions allowed to make donations?

**Fred Fletcher:** Corporations and trade unions are not allowed to make any donations to what the Election Canada rules call a 'political entity', which includes candidates, parties and leaders.

**Peter Mares:** That doesn't sound like there'd be very much money, then, to run elections. How do people fund their campaigns?

**Fred Fletcher:** Well, that's true. When this was proposed, all the established parties were aghast, but when they saw it coming they did a stockpile - so, some of them have a kind of war chest that is grandfathered. But in order to make it palatable to the parties... there was such an outcry that they really increased the amount of public funding available, so that now it's estimated that in the 2006 election the taxpayer paid about 80 per cent of the costs of the parties and candidates in running the campaign.

**Peter Mares:** And how is that public money then dispersed? How do you decide, how does Canada decide, which party gets how much money for running their campaign?

**Fred Fletcher:** The reimbursement has been there for quite a while and it involves a party that receives a certain proportion of the national popular vote can have 50 per cent of its election campaign expenditures reimbursed from the public purse and the candidates can get 60 per cent if they meet a 10 per cent threshold.

**Peter Mares:** Doesn't that benefit existing parties and make it hard for independents or new parties to get started?

**Fred Fletcher:** It does. The new parties get certain kinds of benefits once they run, but they have to wait until they have expenditures to demonstrate and they do get some free broadcast time which helps them get started, but it really is to some extent, a barrier to entry. In 2004 they brought in an additional form of public funding called the Quarterly Allowance. Each party receives C\$1.75 for each vote it receives in the previous election, which is paid on a quarterly basis to help the party just keep operating between elections. The threshold for receiving the quarterly allowance is 2 per cent of the national popular vote, or 5 per cent in the districts that were contested by that particular party.

**Peter Mares:** As I understand it, the Canadian approach has focused less on looking at who's giving money and more on putting an overall cap on how much money is spent.

**Fred Fletcher:** Yes. We started with the cap, with the expenditure controls, because it was felt even in the '70s, with the advent of election campaigns on television, that the costs were running out of

control and the hope was that by reducing the cost it would limit the pressure and therefore the parties wouldn't be as encouraged to look for funds in a variety of unsavoury places. The current cap is about... a little over C\$18 million for a party that runs candidates in all the 308 electoral districts and the candidates are also capped. And it varies according to the size of the electoral district and some other factors but the average is about C\$70,000 for a local candidate.

**Peter Mares:** So, they're pretty low limits, really.

**Fred Fletcher:** They are, yes. Mayor Bloomberg has spent almost as much as all of the national parties combined in our last election.

**Peter Mares:** And obviously in the US they have a constitutional reason for not limiting the amount that Mayor Bloomberg or any other candidate can spend of their own money. But you don't have any such constitutional constraints in Canada...

**Fred Fletcher:** No, that's a really good question. A recent case and some subsequent cases have taken the view that, to quote [character] Toby Ziegler in [television drama] 'The West Wing', money is speech. And this went all the way to our court in two cases that are very important: the expenditure limits were upheld and also expenditure limits on third parties, by which I mean corporations, unions and interest groups.

**Peter Mares:** Because that's another problem that can arise in any political system, is if you limit the donations to candidates and parties the money goes instead to third parties, so-called political action committees in the US, who then campaign, run sort of proxy campaigns.

**Fred Fletcher:** That's right. In fact my view is that expenditure measures on parties in Canada which can't be sustained unless you have the limits on third party expenditures as well. In Canada they're very strict: third parties are only allowed to spend about C\$175,000 nationally - during the actual election period - and only about C\$3,500 in any given electoral district to support or oppose the candidate or party.

**Peter Mares:** What if they're campaigning on an issue, though, and that issue is clearly identified with one side or the other. I mean, we had that here, of course, in the most recent Australian federal election, where the trade unions ran a big campaign which, while it wasn't explicitly pro-Labor, was certainly anti-the Coalition and its industrial relations policy.

**Fred Fletcher:** Yes, I saw quite a bit of that even before the writs were issued. It's fairly clear in the Canadian legislation that if an issue is clearly associated with a party then that constitutes an election expense and is covered by those limits.

**Peter Mares:** So, Canadian TV must be refreshingly free of political advertisements.

**Fred Fletcher:** Well, they seem to be quite ubiquitous during the campaign, but we have a relatively short election campaign - a maximum of five weeks - and all these restrictions I've been talking

about only apply during - except the contribution limits - it's only applied during the writ period, which is one of the problems. The expenditure limit regime is not working as well as a result of the advent of the semi-permanent election campaign.

**Peter Mares:** So, there is need for more reform...

**Fred Fletcher:** Yes. A couple of things have been proposed. We have gone to some provinces and at the federal level to a fixed election date, and a fixed election date allows you to specify a much longer campaign period. Say, for example, that any expenditure in the six months prior to the election date would come under the regime.

**Peter Mares:** So, what was your assessment of the Australian system, having watched campaigning for our last federal election?

**Fred Fletcher:** First of all, I was surprised at the amount of pre-writ advertising.

**Peter Mares:** So, how much political campaigning and advertising went on before we ever got anywhere near the election. I think of us were surprised at that as well!

**Fred Fletcher:** I think it's been growing and it's been growing everywhere, so Australia's not unique in that respect. One of the things I liked about the Australian pre-election and election campaign was an element that you wouldn't want to try to destroy by regulation, and that is a kind of free-for-all, a very exciting kind of debate, even if it wandered into nastiness at times. On the other hand it seemed like a kind of Wild West system, without much regulation and involving a lot of expense and favouring the parties that can raise the money. That's why I understand from the scandals and so on that there's now pressure to do something. When the scandals start to surface then there's a chance something might be done to level the playing field and try to... what I like to call it is a good democratic election is a system of regulated competition, not unrestrained competition. And in order to make it as far as possible it's necessary to bring in regulations. But they have to be thought about fairly carefully so you don't damage the quality of the debate at the same time.

**Peter Mares:** Professor Fred Fletcher, thank you very much for joining me in The National Interest.

**Fred Fletcher:** It's a pleasure, it was a very interesting topic.

**Peter Mares:** Political scientist Fred Fletcher, Emeritus Professor at York University in Toronto.

So here's an idea for the 2020 Summit: Australia could adopt campaign finance laws that borrow from both New York and Canada - caps on donations, caps on spending, and online searchable database that provides details of where political money comes from and how it's spent.

Too much to ask? Tell us what you think in the Guestbook.

## **Guests**

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**Amy Loprest**

Executive Director

New York City Campaign Finance Board

**Fred Fletcher**

Professor Emeritus

Communication Studies and Political Science

York University (Canada)

**Further Information**

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**New York City Campaign Finance Board**

**Canadian party and candidate financing provisions**

Elections Canada

**Presenter**

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Peter Mares

**Producer**

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James Panichi

Radio National often provides links to external websites to complement program information. While producers have taken care with all selections, we can neither endorse nor take final responsibility for the content of those sites.



**Friday 6pm**  
repeated **Sunday midday**

Presented by  
**Peter Mares**

## APPENDIX B



SENATOR JOHN FAULKNER  
CABINET SECRETARY  
SPECIAL MINISTER OF STATE

LINDSAY TANNER  
MINISTER FOR FINANCE AND DEREGULATION

21/2008

JULY 2, 2008

### NEW ADVERTISING GUIDELINES

The Rudd Labor Government has today released new advertising guidelines that will govern the content of Commonwealth Government campaign advertising.

Each advertising campaign will now be certified against the new guidelines by the chief executive of the commissioning department or agency, and major campaigns will be reviewed by the Auditor-General before the campaign is allowed to progress.

These new procedures will now give the public confidence that campaigns are legitimately authorised, properly targeted and non-political.

In 2007, Kevin Rudd made an election promise that campaigns over \$250,000 would be scrutinised by the Auditor-General.

This election commitment is now met.

The guidelines and certification process will ensure Government advertising and information campaigns provide objective, factual and explanatory information, free from partisan promotion of government policy and political argument.

One of the first acts of the Rudd Labor Government was to abolish the Ministerial Committee for Government Communications (MCGC), and the Government Communications Unit (GCU) in the Department of Prime Minister and Cabinet. The MCGC was a committee of Howard Government politicians and staff which ran the Government's advertising program.

Coordination of procurement contracts and managing the policy and procedures for the development and implementation of Government advertising campaigns will be undertaken by the Department of Finance and Deregulation so that in addition to increasing accountability and transparency, these new arrangements will also allow greater efficiency and savings through better coordination of government's requirements and procurement contracting arrangements.

Ministers will be briefed on the progress of campaign development, but responsibility for that development will be wholly undertaken by the commissioning department, with assistance from the Department of Finance and Deregulation.

Campaign expenditures will be published biannually.

The new guidelines are based on those developed by the Auditor-General in 1998, after the previous Government's first tax advertising campaign screened directly before that year's election. Those guidelines were refined by the Joint Parliamentary Committee of Public Accounts and Audit in 2000.

However, the Howard Government refused, for ten years, to adopt the Auditor-General's guidelines and in that time spent more than \$1 billion in campaign advertising including spending on the "Chains" campaign publicising the GST; the \$116 million Workchoices campaigns and others. The figures show that campaign spending spiked just before each election.

The Rudd Government recognises that advertising and information campaigns are necessary to inform Australians of Government programs, and for operational activities of agencies such as defence recruitment. But the Government believes campaigns should be politically neutral and not a weapon of political incumbency.

A new apolitical approach to Government advertising was desperately needed. The new guidelines reflect the Government's commitment that public funds not be spent on political advertising dressed up as Government promotion.

FOR COMMENT: Colin Campbell  
Nardia Dazkiw

0407 787 181 (Cabinet Secretary)  
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Finance and Deregulation)

## KEY FEATURES:

Specific guidelines ensure that the Government advertising system is not abused and that all campaigns are properly authorised and funded within the boundary of legislative authority or a Cabinet decision:

*The subject matter of material to be communicated to the public should be directly related to the Government's responsibilities. As such, only policies or programs underpinned by legislative authority, appropriation of the Parliament, or a Cabinet Decision which is intended to be implemented during the current Parliament, should be the subject of an advertising campaign.*

This guideline ensures that a Government cannot advertise, as "government policy", a proposed election policy, as the Howard Government did in its tax advertising campaign in 1998.

The appearance and messages of campaigns are also addressed by the guidelines:

*The material communicated must be presented in an explanatory, fair, objective and accessible manner. Specifically, information in campaigns should be directed at the provision of objective, factual and explanatory information and enable the recipients of the information to reasonably and easily distinguish between facts, on the one hand, and comment, opinion and analysis on the other.*

This guideline ensures that emotive political imagery and slogans are avoided. This is also stipulated in the following guideline:

*Material should be presented in a manner free from partisan promotion of government policy and political argument, and in objective language. The dissemination of information using public funds should not be directed at fostering a positive impression of a particular political party or promoting party political interests. Dissemination of information may be perceived as being party-political because of any one of a number of factors, including:*

- (a) *the content of the material - what is communicated;*
- (b) *the source of the campaign - who communicates it;*
- (c) *the reason for the campaign - why it is communicated;*
- (d) *the purpose of the campaign - what it is meant to do;*
- (e) *the choice of media - how, when and where it is communicated;*
- (f) *the timing, geographic and demographic targeting of the campaign;*
- (g) *the environment in which it is communicated; or*
- (h) *the effect it is designed to have.*

These guidelines also observe the sensitivity of the timing of advertising campaigns which could be politically favourable to the incumbent Government.

The procurement and management of the central advertising system was moved to Finance and out of the Department of Prime Minister and Cabinet as part of the December 2007 machinery of government changes. The Cabinet Secretary will oversee the probity issues surrounding advertising. The Minister for Finance and

Deregulation will oversee the management and procurement policies of the advertising system.

Home departments and agencies will be responsible for the commissioning, research and communications strategies, and creative decisions with guidance from the Department of Finance, and without political interference.

The Auditor-General will provide a "health check" on the final product of a campaign before it is communicated.

As part of the Government's commitment to implement the JCPAA Guidelines, and particularly accountability and transparency, a report will be tabled in the Parliament biannually. It is proposed that reporting will be for the periods ending 31 December and 30 June.