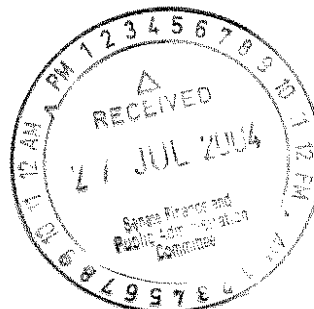




**PUBLIC HEALTH ASSOCIATION**  
of Australia Inc  
ABN 41 062 894 473



Chairperson  
Senate Committee on Government Advertising  
Parliament House  
CANBERRA ACT 2600

Dear Chairperson,

**Submission to the Senate Committee on Government Advertising**

The Public Health Association of Australia (PHAA) is a forum for the promotion of the health of the public as well as serving as a professional resource for public health personnel. The Association provides opportunities for the exchange of ideas, knowledge and information on public health and actively undertakes advocacy for public health policy, development, research and training. The PHAA is a non-party political organisation.

The PHAA would like to raise the following four issues for the Committee's consideration:

- **Transparency of processes** – The processes used by the Ministerial Committee for Government Communications (MCGC) are highly opaque and consequently are not conducive to either good administration or public accountability.

For example, over the past year the social market research for a domestic violence campaign was developed and a campaign was prepared and presented to the MCGC. The proposed campaign was withdrawn on the advice of MCGC, without adequate explanation of reasons for the withdrawal. It was not possible for the public to determine whether the campaign had been withdrawn because of changes to or maladministration of the terms of reference provided to the campaign developer, inadequate social research, being politically unpalatable, or being a badly developed campaign. Nor was it possible to determine the full costs of developing the first campaign and then developing the second campaign and who footed the bill for the changes.

- **Expenditure appropriate to outcomes** – Each year there are a variety of social marketing and health promotion campaigns run by the Commonwealth. By and large, these campaigns are based on high quality social marketing research. However, the outcomes that are achieved due to these campaigns are rarely assessed against the cost of undertaking them. Consequently we have no

performance measures to help determine the cost/benefit of undertaking the campaigns, particularly in relation to long-term morbidity costs.

- **Inappropriate use of program funds for political campaigns** – The PHAA is very concerned that funds that should be used for social marketing and public health campaigns have been allocated to barely disguised political advertising. This is particularly the case in relation to the saturation campaign on the “new” Medicare. This campaign does not have a social marketing or health promotion focus and cannot be said to be appropriate advertising of a new policy. At the very least the length and frequency of the advertisements are out of step with comparable program changes in other aspects of health. We also note that in the last few weeks (ie in the months preceding a general election) the government has initiated several other very high profile advertising campaigns that might be considered by some to be more like party political advertising than government public information.
- **Hidden costs** – The current reporting of the costs of campaigns seems to be understated by the government. The figures provided by the Government would seem to be those for the costs of media buys, but do not seem to include all of the development costs. This understates the expenditure on campaigns and advertising by a significant amount and seems to be a tactic to avoid stating the complete costs of campaigns. The costs of campaigns that are under development but then are withdrawn are also excluded from figures provided by the Government. Again this would seem to be a deliberate attempt to mislead the public as to the complete cost of campaigns.

The PHAA has strongly supported a number of the Government’s social research and public health campaigns. However, we remain concerned about the issues detailed above. I would be happy to talk to you or your staff about these issues should that prove useful. I can be contacted on (02) 62852373 or at [plaut@phaa.net.au](mailto:plaut@phaa.net.au)

Yours sincerely,

*Pieta Laut*

Pieta Laut

Executive Director

23 July, 2004