

Joint Standing Committee on Foreign Affairs, Defence and Trade INQUIRY INTO SUPPORTING DEMOCRACY IN OUR REGION

RESPONSE TO QUESTION ON NOTICE Australian Electoral Commission

Subject: Reputation Management Framework
Question date: 10 March 2023
Question type: Hearing Proof Hansard, page 9
Response date: 22 March 2023

Question

Senator Van: Yes. Given the time constraint, this question might be best taken on notice. I'd like more information about that reputational risk tool that you've built.

Response

The Australian Electoral Commission (AEC) developed a Reputation Management Framework to coordinate key aspects of its approach to electoral integrity and establish the direction for reputation management communication.

Details of the framework are set out in the *Electoral Integrity: Reputation Management Strategy* of November 2021 at Attachment A. This document is also published on the AEC electoral integrity journey webpage at www.aec.gov.au/About_AEC/integrity-timeline/timeline.html.

The Reputation Management Strategy (RMS) is an aspirational document to guide the agency's efforts to support the integrity of, and maintain trust in, the AEC and federal electoral process. It was conceived in 2021 in the context of changing global affairs impacting electoral events and electoral management bodies worldwide. The RMS was developed in recognition that the operating environment had fundamentally changed and would continue to evolve along with Australia's information and security environment.

First and foremost, the AEC recognised the successful delivery of an election was not enough to ensure trust. It was also necessary to protect and promote the integrity of all AEC activities, acknowledging they had the potential to impact the reputation of the agency and public perceptions of the integrity of electoral events.

The attached RMS was a pilot and references a number of internal operational plans. The AEC is currently developing the next iteration of the RMS and this will be a comprehensive, interconnected system to outline, sustain and enhance key activities that contribute to the protection and elevation of the AEC's reputation. It is anticipated the new RMS will be in place for the proposed referendum and the next federal election.

November 2021

Attachment A

Electoral integrity:

Reputation Management Strategy

Purpose

The Reputation Management Strategy forms a fundamental part of the AEC's doctrine hierarchy in providing the strategic direction, principles, and approach to manage the AEC's reputation and electoral integrity. This strategy summarises the components of the AEC's Reputation Management Framework and outlines:

1. The external operating environment

An assessment of the broad environment and the critical importance of organisational reputation.

2. The challenge

The electoral and communication context surrounding Australian federal electoral events.

3. The approach

The AEC's overarching approach to reputation management.

4. The principles

The principles that guide activities within the AEC's Reputation Management Framework.

5. The Framework

A summary of the four components of the AEC's Reputation Management Framework:

- i. Stakeholder Engagement Plan
- ii. Media and Digital Engagement Plan
- iii. Electoral Disinformation Management Plan
- iv. Crisis Management Plan

“Credibility can be considered the most valuable asset any electoral management body can possess because it can dramatically enhance electoral security.”

Simon Longstaff – Democracy, Trust and Legitimacy (Papers on Parliament, 2015)

“With faith in democracy taking major hits all over the globe, winning back the people's trust and satisfaction would appear to be one of the most pressing and urgent challenges facing our political leaders and institutions.”

Professor Ian McAllister – <https://www.anu.edu.au/news/all-news/trust-in-government-hits-all-time-low>

The above statements highlight the centrality of trust, credibility and legitimacy to effective democratic systems: something previously a struggle for developing democracies, and now an evolving risk in long-established democratic systems.

While it is not only election management bodies who play a role in facilitating the acceptance of credible election results, it is also clear that trust in the AEC is intrinsically linked to a citizen's trust in the integrity of Australian federal elections.

This strategy, and the broader AEC Reputation Management Framework seeks to protect and build on the AEC's reputation with the interests of federal elections, voters and the nation at the forefront.

1. The external operating environment

An assessment of trust in Australia

In this epoch, the concept of trust in relation to many of our most important institutions and professions is the subject of intense scrutiny. It begs the question: is this scrutiny as a result of an increasing prevalence of bad faith actions by those institutions, or are relatively isolated issues finding a receptive audience fuelled by a burgeoning social media and citizen journalism, or a combination of both.

Some have described this environment as a 'trust deficit', which speaks to the void between community expectations of our key institutions, and the prevailing reality at any given time.

Trust in the AEC

The AEC conducts benchmark and tracking research to evaluate its communication campaign every election. The survey asks respondents about their confidence in the agency's ability to deliver electoral services and whether the AEC has or will conduct the federal election fairly and impartially. Perceptions of the AEC have been consistently strong in the research for the past four federal elections. In 2019, 87 per cent of respondents overall indicated they were very or fairly confident in the AEC's ability to deliver electoral services, and 85 per cent overall believed the AEC would conduct – or had conducted – the 2019 federal election fairly.

An interesting contrast to the situation in Australia is the historically low levels of confidence Americans have in their own electoral system. Given the tumult surrounding the 2020 US presidential election, it is hardly surprising that various surveys indicate confidence in the outcomes of that election was relatively low: only 65 per cent of voters say the election was free and fair, including 92 percent of Democrats and 32 percent of Republicans (Morning Consult, January 2020). However, it is interesting to note that in elections going back to Bush v Gore, confidence rarely pushes much above 70 per cent, and the Bush v Gore election showed confidence levels of only 55 per cent. Obviously, such high levels of mistrust breeds dissatisfaction and anger as can be seen in America's response to their latest election.

2. The challenge

Effective reputation management must take into account a vast range of continually shifting considerations. The contextual environment surrounding the reputation of the AEC, and more broadly of Australian federal electoral events, has elements that:

- are constant and unchanging;
- can shift subtly and slowly; and
- can and have recently, changed dramatically.

The environment as described below is therefore partly a point-in-time account. 'The challenge' to uphold electoral reputation involves both operational matters and external factors that are largely outside the AEC's control.

Communication context

Reputation management is critical to ensure electoral integrity and instil public trust in election results. This is most notable during a federal election – when the link between performance and ongoing external reputation is at its strongest.

The higher the stakes in an activity or process, the greater the possibility that results may be mistrusted. Australian federal elections are a prime example of a high stakes process that, when combined with a politically charged modern media and social media landscape, has the potential for high levels of distrust. This is evident in the increasingly divisive, critical and at times factually incorrect digital communication aimed at, and observed by, the AEC during federal election periods. At the extremes, a small percentage of that commentary borders on being unhinged. Furthermore, citizens who hold and volubly express some of the most extreme and illogical views have an unshakeable belief in the veracity of their opinions and knowledge.

Many recent studies on the attitudes of voters to Australian democracy have identified and bemoaned declining levels of trust. The 2019 Australian Election Study¹, conducted by the Australian National University (ANU), found Australians' satisfaction with democracy was at its lowest since the constitutional crisis of the 1970s. Survey results indicated that just 59 per cent of Australians were satisfied with how democracy was working – down 27 percentage points from the record high of 86 per cent in 2007.

While the majority of recent negative attitudinal trends have centred on the conduct of individuals and private institutions that participate in democracy, these attitudes extend to an overall feeling of disconnection to, or disbelief in, the legitimacy of our democracy. The AEC's own research findings found a rapidly rising category of Australian voter – disillusioned. This was a new segment identified in the 2019 research that was not present in 2016. The disillusioned segment represented 10 per cent of the eligible voters surveyed and was characterised by moderate importance of voting, as well as less positive voting intent / behaviour.²

¹ *The 2019 Australian Election. Results from the Australian Election Study*, Sarah Cameron and Ian McAllister, www.australianelectionstudy.org

² ORIMA Research: Australian Electoral Commission – Campaign developmental research with the Australian Voting Public (Oct 2019)

In amongst feelings of declining democratic legitimacy, voters and commentators endeavour to find a reason for those feelings. This can result in attention being directed to the regulation of the system by the body that they believe to be an umpire fully empowered to rule on all aspects of electoral participation – the Australian Electoral Commission.

The management of electoral reputation has become particularly intense in this era of social media, particularly when citizens and other commentators can be astonishingly swift to develop, and then promulgate, unshakeably strong views about electoral events. The rise of modern digital communication mediums has also coincided with the rise of foreign and domestic actors seeking to interfere and undermine electoral processes. This was alleged to have occurred in democracies like the US, UK and France. Such interference can occur through, for example, online campaigns and commentary using false or divisive information.

The proliferation of disinformation and misinformation around electoral processes, via both social and traditional media sources, has the ability to result in real world physical security incidents, threatening democratic institutions and electoral processes. Australia is not immune to this potential and the pre-emptive campaigns, social media policy changes, and resulting responses to instances of this nature have varied in effectiveness.

This difficult communication environment makes effective reputation management for the AEC and elections increasingly critical. The need to positively influence perceptions of electoral integrity and instil trust in election results has never been higher.

Operational context

In addition to the rapidly evolving communication environment, the challenge of delivering an Australian federal election has been described as one of the largest and most complex Australian peacetime logistical exercises.

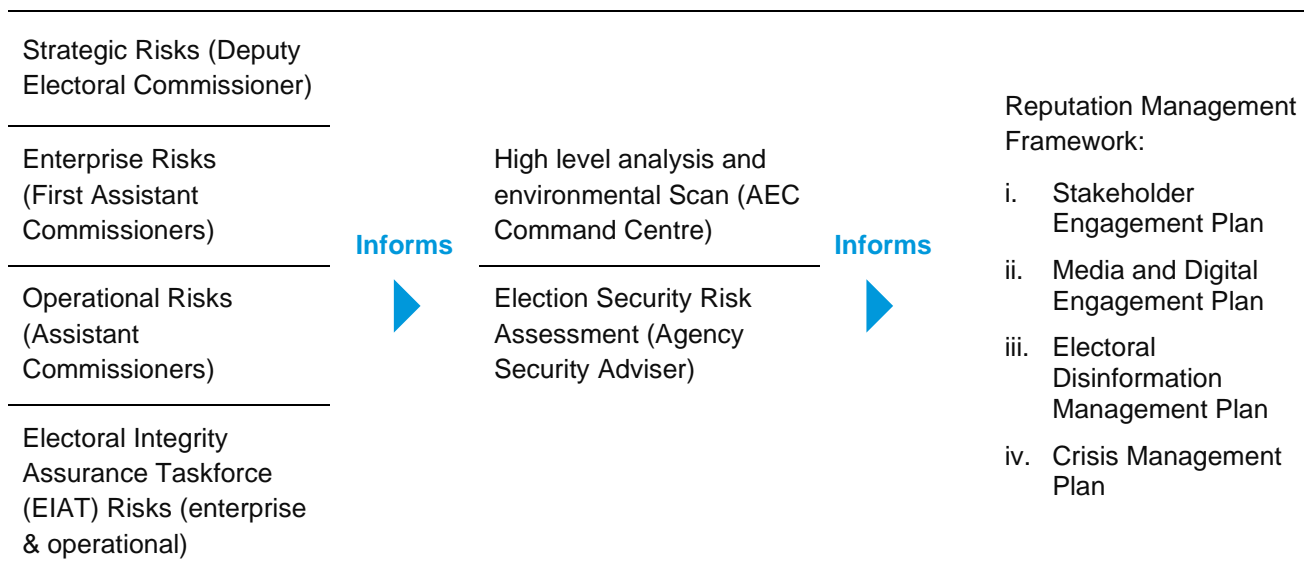
Australia's voting system allows people, within some legislative boundaries, to effectively cast a vote at their choice of venue, via post, within their home state, interstate or overseas, and at a time of their choosing within the voting period. While Australia's voting access is rightly admired internationally, this system results in vast administrative complexities in administering of voting premises, materials and staffing, and the transport and reconciliation required for the counting process.

The AEC's operational challenge includes millions of election-time transactions – many of which are undertaken by short-term staff who have not received extensive training – that have the potential for failure. Notwithstanding the procedural considerations, there is also the potential for factors largely outside of the AEC's control such as natural disasters, acts of terror, foreign interference, violence or even health pandemics.

If realised, these potential points of failure can have either a large or small practical effect on the conduct of the election, but the potential for reputational damage can be extremely high in either case.

Risk to electoral integrity

The AEC's risk policy and structure identifies strategic risks as emerging from the external environment and may impact or force a change to the agency direction(s), such as emerging trends and stakeholder expectations. Enterprise and operational risks such as people, work health and safety, and integrity risks, impact on our ability to achieve agency directions. These identified risks inform the high-level analysis and environmental scan, which in turn informs this strategy.



The AEC's Crisis Management Plan, developed in conjunction with the AEC Command Centre, will outline processes to mitigate risk and reduce the impact of a crisis or incident. The AEC's preparation, response and recovery actions are crucial in managing a crisis and have a direct effect on the AEC's integrity and reputation.

3. The approach

The AEC's values of ensuring 'electoral integrity through quality, agility and professionalism' underpin everything we do in the AEC. The values are strongly engrained into AEC culture and operations.

The AEC's approach to ensuring electoral integrity encompasses security, information and operations measures, as articulated in *Figure 1 Electoral Integrity*. The domestic and international environments coupled with community and stakeholder expectations also have significant impacts on Australia's electoral reputation. The formation in 2021 of the AEC's *Electoral Integrity and Communications Branch* further embedded electoral integrity as a core agency focus.

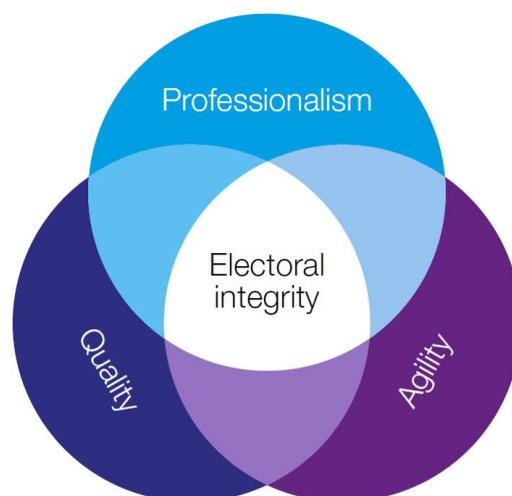
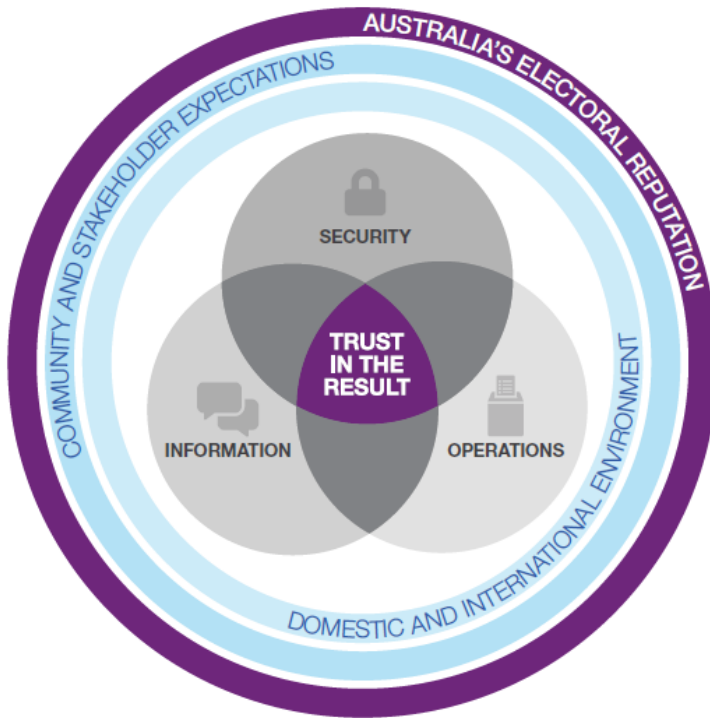


Figure 1: Electoral Integrity



Security: Cyber security risk management through controls that combine people, processes and technology. Control of the physical security environment of all aspects of an election.

Information: Information about the electoral process is accurate, trustworthy and actively protected.

Operations: Procedures are robust, rehearsed and in line with electoral laws. Core to operational integrity is the sanctity and security of the ballot paper.

Security

Physical security

AEC employees play a critical role in demonstrating sound security leadership and promoting a positive security culture based on the premise that security is everyone's responsibility. They do this through their personal example, compliance with the relevant security policies and ensuring that the process for managing security risk is logical, systematic and forms part of standard business or operational management processes.

The AEC produces an Agency Security Plan, which articulates the AEC's strategic security goals and objectives, the security management strategy, the key roles and responsibilities of the AEC's security organisation and a 2-year forward security work program.

The AEC works in partnership with Police Local Area Commands and security and intelligence agencies to ensure best threat and protective security information is received by those that require it. The AEC has engaged closely with the Australian Federal Police (AFP), state and territory police forces to discuss the operating environment for the next federal election and the operating model required at the next election. This engagement will support the effective coordination and management of any incidents or disruptions on polling day and to help discharge the requirements outlined in *Australia's Strategy for Protecting Crowded Places from Terrorism*. All state and territory police forces will have their Command Centres operational on polling day and will link into the AFP as the coordinating body for the AEC to directly interact with (from the AEC Command Centre). The AFP is working with all state and territory police forces and the AEC to further plan out the detail of this model before the next federal election.

Cyber security

The AEC defines a cyber security incident as any (intentional or unintentional) unauthorised activity or action that presents a risk to the confidentiality, integrity or availability of AEC information. Cyber security incidents do not involve compromise of physical or personnel security, with the exception of the loss or theft of ICT equipment containing AEC information.

The AEC operates a cyber security governance program to ensure that the risks associated with our applications are known, remediated where appropriate and ultimately accepted by the organisation.

This occurs in alignment with the relevant portions of the Protective Security Policy Framework (PSPF) and the Information Security Manual (ISM).

The AEC maintains regular working partnerships with relevant security agencies to provide additional operational assurance. This includes working very closely with the Australian Cyber Security Centre (ACSC).

In 2020 as part of the ACSC's Cyber Security Response Fund (CSRF), the AEC worked with IT consultancy resources made available through the ACSC, to materially improve its cyber security posture against the Essential Eight (E8).

Following subsequent fundamental changes to the E8 maturity model, the AEC continues working with IT consultancies again via the ACSC, to improve our cyber security posture against the revised maturity model. The AEC intends to also engage consultancies directly, to ensure our security posture against the revised E8 meets our maturity targets prior to the upcoming federal election.

Prior to the upcoming federal election, the ACSC will undertake a series of activities to further strengthen the AEC's cyber security environment.

"Elections are at the heart of democracy. When conducted with integrity, they allow citizens to have a voice in how and by whom they are governed."

Kofi Annan – former Secretary General of the United Nations, 2016

Information

Sustained stakeholder engagement

An effective measure to enhance and maintain the AEC's operational integrity, as well as re-affirm its brand credibility and authority, is to organise an early program of targeted stakeholder engagement. The AEC undertakes comprehensive stakeholder engagement throughout the electoral cycle on a range of strategic and operational matters. (See Stakeholder Engagement and Media and Digital Engagement Plans.)

Cross-organisational and parliamentary engagement

The AEC chairs the Electoral Integrity Assurance Taskforce (EIAT), a body of representatives from across Government that assists in monitoring and reacting to the security and communication environment surrounding Australian elections.

The AEC also works with Parliament throughout the electoral cycle to maintain and increase the strength of the Australian federal electoral system. AEC submissions to the Joint Standing Committee on Electoral Matters (JSCEM) often aim to inform considerations of emerging risks in the electoral environment, of which disinformation is a key factor.

Operations

Securing the operational process

The AEC has worked to incorporate characteristics and practices of a High Reliability Organisation (HRO) to build trust and manage our reputation.

AEC operational planning centres on the development and implementation of an Election Readiness Framework. The Election Readiness Framework manages the interlinked set of actions, steps, policies and activities that make up the process of preparing for an election and better equip the AEC to manage strategic risks.

Core to the AEC's operational implementation is the sanctity and security of the ballot paper from design and production through to counting and storage.

Note: While operational processes are vital to the AEC's management of the reputation of federal election events, the strategies and plans that address these elements sit outside the AEC Reputation Management Framework. That said, all employees of the AEC are guided by the organisation's values of professionalism, agility, quality and electoral integrity every day.

Communicating the operation

Securing the operational processes that result in the delivery of a federal election lessens the risk of failures that can damage perceptions of electoral integrity. However, it cannot impact levels of ingrained democratic distrust, or counter real or likely conjecture regarding electoral integrity, if citizens are not informed about the controls and measures in place.

In essence, community sentiment about electoral integrity must be fostered through effective and highly accurate communication. One of the most effective things an electoral management body can do to protect against the threat of electoral disinformation is to prepare citizens ahead of an electoral event. The AEC will proactively enhance the positive reputation from the Australian electoral system, including highlighting the operational controls in place to deliver trusted results and safeguard elections against disinformation.

This approach is outlined in both the Electoral Disinformation Management Plan and the Media and Digital Engagement Plan.

"Facts are no longer enough – they are not persuasive. They need to be packaged and advertised so maybe we need to draw lessons from advertising agencies on ways to reach people not just on a factual and mental level but on an environmental level as well."

Dr Jennifer Hunt – National Security College, July 2020

Communicating the Framework

The value of having a Reputation Management Framework (the Framework) is increased exponentially with regular, consistent, and well-considered communication about the Framework – its existence, principles and key attributes.

Talking points regarding the Framework include the following.

- The AEC has developed a Reputation Management Framework to coordinate key aspects of our approach to electoral integrity and firmly set the direction for reputation management communication.
- The Framework includes a focus on proactive management of disinformation and maturing our crisis management response.
- The Framework is led by six key principles that encapsulate the need for the AEC in the modern electoral communication landscape to communicate early, regularly and judiciously in order to firmly position the AEC as the foremost electoral process experts.

Key messages – Framework activities

While the AEC has always had a focus on electoral integrity, recent electoral cycles have been marked by a notable increase in this concentration. The below activities are key messages to communicate as part of this electoral integrity journey.

- The AEC's 'Stop and Consider' campaign run during federal electoral events was one of the first electoral disinformation public awareness campaigns in the world. It signifies an understanding of the now-established need, as Australia's federal electoral administrator, to alert voters to the dangers of electoral disinformation and the need to check the source of information they consume.
- The AEC is the Chair of the Electoral Integrity Assurance Taskforce (EIAT), which provides a response capability during electoral events. The EIAT has also supported a number of state and territory events in recognition that a breach to one electoral system in Australia undermines the integrity of all electoral systems.
- The AEC consistently works together with State and Commonwealth agencies on the future of electoral security. The Interjurisdictional Working Group on Electoral Integrity and Security (IWGEIS) – with federal and state electoral commissions and government representatives – provides communication and coordination avenues and collectively drives future initiatives.
- The AEC maintains strong working relationships with online and social media platforms that have a significant presence in Australia. As part of this, we lead the maintenance of referral procedures for all Australian and New Zealand electoral management bodies to online platforms regarding the enforcement of electoral legislation.
- The AEC undertakes an active program of electoral education and reputational communication. In addition, we undertake active media and social media management/monitoring in line with the principles of the Reputation Management Strategy.

4. The principles

The six principles below underpin the AEC's approach to reputation management, communication planning and other activities delivered under the AEC Reputation Management Framework.

1



Be proactive in building a positive reputation for the Australian electoral system

2



Undertake open and regular communication with voters and stakeholders

3



Position the AEC as the foremost subject matter expert on federal electoral processes in Australia

4



Exercise judicious use of language, tone and timing in political, media and social media environments

5



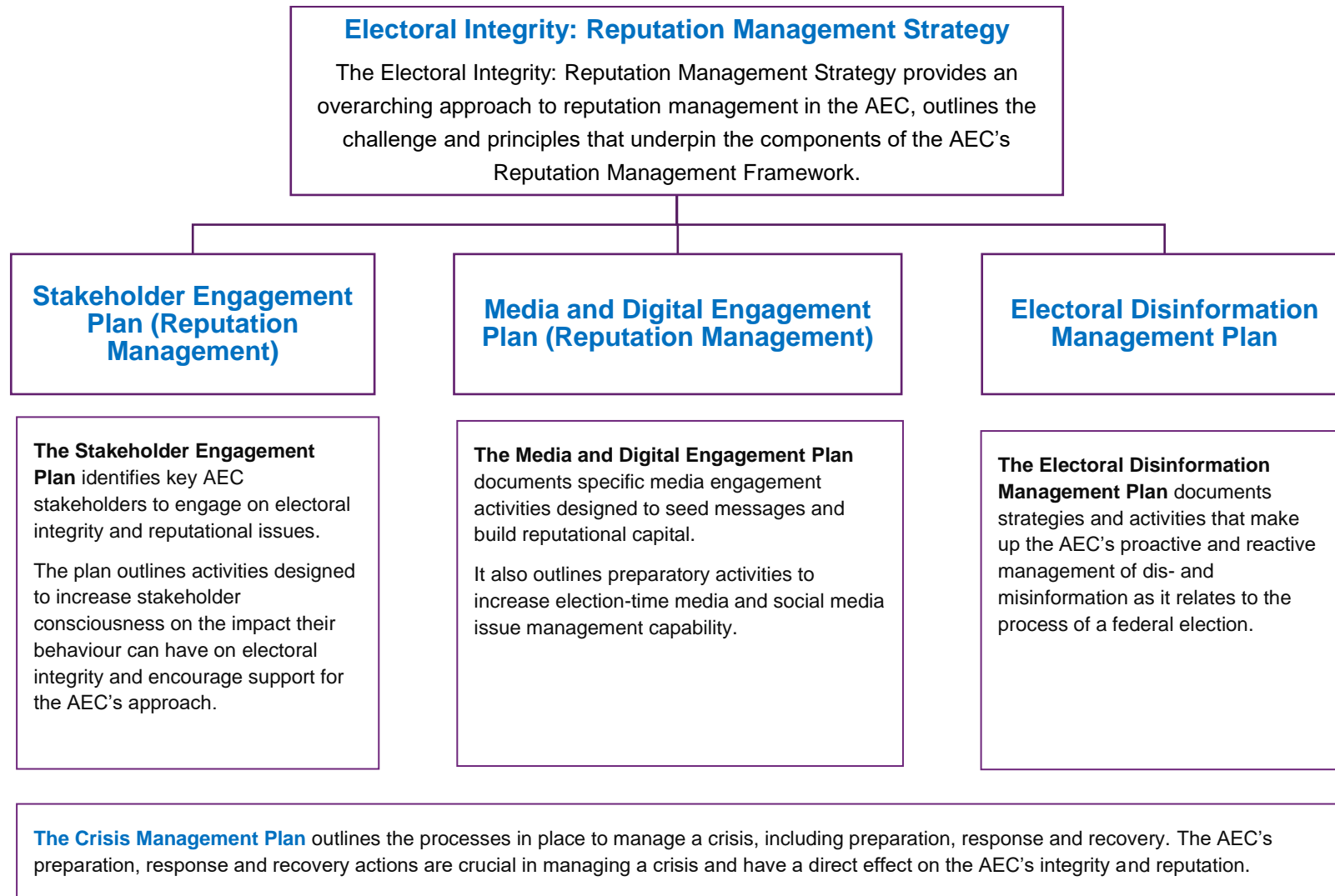
Back-up public statements with operational delivery

6



Actively monitor issues, manage risks, and plan for crisis situations

5. The Framework



What does success look like?

The below are indicators which will determine the success of the Electoral Integrity: Reputation Management Strategy mapped against the AEC's six reputation management principles:



Principle 1: Be proactive in maintaining a positive reputation for the Australian electoral system.

Measure of success: AEC communication on reputational matters provides an evidence base of consistent effort to educate Australians on the election process and address potential disinformation.



Principle 2: Undertake open and regular communication with voters and stakeholders.

Measure of success: Electors and stakeholders have timely access to relevant information about topical aspects of electoral delivery at each point in the electoral cycle.



Principle 3: Position the AEC as the foremost subject matter expert on federal electoral processes in Australia.

Measure of success: The AEC is actively sought out, and thought of, as electoral experts and is therefore positioned to diffuse disinformation about electoral processes.



Principle 4: Judicious use of language, tone and timing in political, media and social media environments.

Measure of success: AEC communication regarding reputational matters resonates with consumers as a reflection of an authority that professionally acts within its legislative remit, strengthening positive perceptions of electoral integrity.



Principle 5: Back-up public statements with operational delivery.

Measure of success: Historical statements regarding operational delivery errors are unable to be used as the catalyst for criticism in the current environment.



Principle 6: Actively monitor issues, manage risks, and plan for crisis situations.

Measure of success: Processes are in place to monitor reputational issues and plans are in place to manage a potential crisis. When issues are not known, the AEC becomes aware and is able to act quickly.

More detailed evaluation of the Reputation Management Framework will be undertaken on the individual planning documents as part of the AEC's lessons learned process following a general federal election.