



Legislative Assembly for the
Australian Capital Territory

Standing Committee on the Integrity
Commission and Statutory Office
Holders

Submission Cover Sheet

Inquiry into the Government Agencies (Campaign Advertising) Amendment Bill 2025

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1. Introduction and Context

The Australian Multicultural Action Network (AMAN) welcomes the opportunity to provide this submission to the Standing Committee on the Integrity Commission and Statutory Office Holders in relation to the Government Agencies (Campaign Advertising) Amendment Bill 2025.

AMAN is a national community-led organisation working at the intersection of multiculturalism, governance integrity, inclusion, and democratic participation. Our work is grounded in lived experience across culturally and linguistically diverse (CALD) communities, seniors, people with disability, and newly arrived Australians - cohorts who are often the most impacted by how government information is communicated, framed, and trusted.

This submission is provided by Ravi Krishnamurthy on behalf of AMAN, drawing on extensive experience in public policy advocacy, parliamentary submissions, integrity frameworks, and community engagement. It reflects a strong belief that **how governments communicate is inseparable from public trust in democracy itself.**

2. AMAN's Overall Position

AMAN **strongly supports the intent and direction** of the Government Agencies (Campaign Advertising) Amendment Bill 2025. We view the Bill as:

- A timely modernisation of an integrity framework that has remained largely unchanged since 2010
- A necessary recalibration of the boundary between legitimate public information and impermissible political promotion
- A confidence-building measure for communities who increasingly question whether government communications serve the public interest or electoral advantage

At its core, this Bill reinforces a simple but powerful principle: **public money must never be used to influence electoral outcomes, directly or indirectly.**

3. Why This Bill Matters to Multicultural and Vulnerable Communities



For many CALD communities, government advertising is not simply informational - it is often their **primary interface with government**. Language barriers, cultural norms around authority, and limited civic literacy mean that:

- Government messaging can be perceived as authoritative endorsement rather than neutral information
- The presence of political figures, party branding, or achievement-framing can unintentionally distort understanding
- Trust, once eroded, is extremely difficult to rebuild

AMAN has observed that when communities sense political self-promotion in official communications, it creates:

- Cynicism about democratic institutions
- Reduced participation in consultations and civic processes
- Heightened disengagement among already marginalised groups

By clarifying what constitutes a party political purpose and tightening safeguards during election periods, the Bill directly addresses these risks [\[filecite?turn0file0?\]](#).

4. Clarifying “Party Political Purpose”: A Necessary and Welcome Reform

AMAN strongly endorses the expanded definition of party political purpose, particularly the explicit inclusion of:

- Naming or depicting Members of the Legislative Assembly, candidates, or prospective candidates
- Use of party branding or imagery resembling party identity

In an era of image-driven communication and social media amplification, **name-recognition and visual association are themselves political assets**. The Bill’s recognition of this reality demonstrates legislative maturity and responsiveness to contemporary campaigning practices [\[filecite?turn0file1?\]](#).

From a community perspective, this clarity:

- Reduces ambiguity for public servants tasked with compliance
- Protects communities from subtle but powerful forms of political persuasion
- Strengthens perceptions of public service impartiality

AMAN views this as one of the Bill’s most important and forward-looking reforms.

5. Advertising on Proposed Government Programs: Re-centering Public Consultation

The new requirement that advertising about proposed government programs must be explicitly linked to public consultation is a principled and democratic safeguard.

AMAN strongly supports this reform because it:

- Prevents the use of public funds to “sell” unapproved policies
- Reinforces the Assembly’s role as the ultimate decision-maker
- Re-positions communities as **participants**, not passive recipients

From AMAN’s experience, consultation is most effective when communities are invited early, transparently, and without pre-determined narratives. This amendment ensures advertising becomes a gateway to dialogue rather than a vehicle for political positioning [\[filecite?turn0file0?\]](#).

Forward-looking suggestion: AMAN encourages the Committee to consider whether future guidelines could include minimum standards for consultation advertising, such as:

- Plain-language explanations
- Multilingual dissemination
- Clear articulation of what is genuinely open to change

6. Federal Election Period Safeguards: Protecting Intergovernmental Neutrality

AMAN strongly supports the introduction of additional restrictions during Commonwealth election periods, including the requirement for consensus approval by all party leaders in the Assembly.

This reform is particularly important because:

- ACT–Commonwealth cooperation is highly visible and easily politicised
- Communities may struggle to distinguish between jurisdictional responsibility and political alignment
- Even well-intentioned campaigns can be perceived as influencing federal electoral outcomes

Requiring cross-party approval is a **high-trust mechanism** that sends a powerful signal to the public that integrity outweighs political convenience [\[filecite?turn0file1?\]](#).

AMAN considers this an exemplary safeguard that other jurisdictions may eventually look to replicate.



7. Human Rights Compatibility: A Missed Opportunity to Go Further

While the explanatory statement concludes that the Bill is not a “significant bill” for human rights purposes, AMAN respectfully suggests that the Committee view this inquiry as an opportunity to **strengthen the human rights narrative** underpinning the scheme.

The right to take part in public life is not only about free expression - it is also about:

- Equal access to unbiased information
- Protection from manipulation by those with disproportionate resources
- Confidence that democratic contests are fair

AMAN encourages the Committee to recommend a future, comprehensive human rights review of the campaign advertising framework, particularly through the lens of vulnerable and underrepresented communities [\[filecite?turnOff?\]](#).

8. Implementation and Continuous Improvement

AMAN emphasises that the success of this Bill will ultimately depend on **implementation**, not intent. We therefore propose:

1. **Revised Guidelines Co-Design**
Engage civil society, integrity bodies, and multicultural organisations in developing the updated guidelines.
2. **Public Transparency**
Publish reviewer decisions, reasoning, and summaries in accessible formats to build public understanding.
3. **Periodic Independent Review**
Introduce a statutory review every 5 years to ensure the framework keeps pace with evolving communication practices.

These measures would elevate the scheme from compliance-based regulation to a living integrity framework.

9. Conclusion: A Bill That Strengthens Democracy

AMAN commends the Standing Committee for undertaking this inquiry and welcomes the Bill as a thoughtful, measured, and integrity-driven reform.



This legislation does more than regulate advertising - it **reaffirms a social contract** between government and the people it serves. By drawing firmer lines around political neutrality, it restores confidence that public communication exists to inform, not influence.

Ravi Krishnamurthy submits this response on behalf of AMAN with a deep conviction that strong democracies are built not only on laws, but on trust - and that trust begins with how governments speak to their people.

AMAN stands ready to assist the Committee further and to contribute constructively to the ongoing strengthening of integrity and accountability in the ACT.