



30 September 2020

Mr Steve McGhie MP
Integrity & Oversight Committee
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Inquiry into the Education and Prevention Functions of Victoria's Integrity Agencies

Dear Mr McGhie,

Thank you for your invitation for the Transnational Research Institute on Corruption (TRIC) to provide a submission to your inquiry. The continued pursuit of best practice by integrity agencies is an important part of their function as corrupt practices and misconduct are not static.

This submission focuses on best practices in relation to social media as an anti-corruption tool for education and prevention functions. The submission also notes the negatives and positives associated with social media engagement in the anti-corruption space. We examine the current use of social media by the integrity agencies, as well as the broader Victorian Government, and offer suggestions towards improving the impact of educative and preventative functions. We suggest that the four integrity agencies – the Independent Broad-based Anti-corruption Commission (IBAC), the Office of the Victorian Information Commissioner (OVIC), the Victorian Inspectorate (VI), and the Victorian Ombudsman (VO) – while making some use of social media platforms, could increase their active use of various platforms to build integrity and corruption resilience.

Sincerely

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Social media presents both a threat and an opportunity to integrity agencies and the public sector. Victoria's integrity agencies need to position themselves to meet the threat and exploit the opportunity.

The internet has evolved significantly as a mechanism for information dissemination, collaboration and interaction over the last 30 years. The last decade has seen mass adoption of smartphones which among other things, has brought with it mobile web access. More than half of people accessing the internet do so through a mobile device.

The corporate world is firmly convinced about the value of internet communication. Government agencies have tended to lag behind, particularly in expanding their use of the website beyond a one-way communication tool. The online presence ensures that information about Government services can be accessed by its clients regardless of their circumstances. There are an increasing number of examples where public sector agencies have utilised their website as a basis for collaboration and engagement in addition to information dissemination. Integrity agencies could enhance their website functionality and social media accounts to contribute to their corruption prevention efforts.

The development of E-government services (e.g. e-health, e-tax, and e-procurement) brought about a change in citizen / government interactions. The Commonwealth Government is increasingly moving into this space with ICT strategies to increase efficiency and support open engagement.

In recent years social media growth has had considerable impact on people both personally and professionally, as well as impacting businesses, not-for-profit organisations and governments. Estimates of total global social media engagement indicate that more than half the world's population use some form of social media¹; while in Australia more than 15 million people use Facebook, four million use Twitter², and approximately one in two people use YouTube.³ Effectively using social media can be a means of providing information, building dialogue and improving community standing. There is also the potential for social media accounts to provide preventative or deterrence effects, and to operate as an alternative reporting mechanism for suspected corruption.

Benefits to utilising social media

Social media can be an effective means of engaging with Victorians and encouraging community participation. This engagement can lead to a better public understanding of the integrity agencies' various roles, and agencies understanding the needs and concerns of stakeholders.

¹ <https://datareportal.com/reports/digital-2020-july-global-statshot>

² <https://www.business.qld.gov.au/running-business/marketing-sales/marketing-promotion/online-marketing/social-media>

³ 2020 Yellow Social Media Report (<https://www.yellow.com.au/social-media-report/>)

Social media is an affordable tool to communicate with a wide audience. It also enables a responsive approach by knowing who is communicating with integrity agencies (the number of followers; the "likes" they have); and audience perceptions through interaction and/or response to integrity messaging (e.g. retweeting; comments; direction to integrity websites; internet traffic). These evaluative measurements offer a low cost means of collecting information that would be difficult to obtain with the use of traditional mass media. Of course, data gathering by integrity agencies needs to be tempered by laws and policies on privacy.⁴

Victorian agencies engagement with social media

Globally, Facebook has around 2.6 billion users, while Twitter sits at approximately 302 million active users. Approximately the same number of Victorian government agencies use Twitter as Facebook. Looking at the integrity agencies Twitter accounts, the OVIC has 1,121 followers; the Ombudsman 3,475 followers, and IBAC 3,241 followers. The Facebook account of the Ombudsman shows lower numbers, at 884. Both the Victorian Ombudsman and the Victorian Inspectorate have engaged with the public via Google Reviews. The use of a multi-pronged and multi-platform approach to social media engagement is a beneficial strategy for the agencies.

The current number of employees in the public sector in Victoria (VPS and public entities) is 300,000, spanning across 1800 departments.⁵ Most of these departments engage to some degree with social media. The total official accounts associated with the Victorian Government is represented in Table 1. A total of 806 accounts exist, across 10 separate social media platforms.

Table 1: Number of social media accounts operated by the Victorian Government; by social media site

Victorian Government	Facebook	Twitter	YouTube	Linkdin	Instagram	Pinterest	Podcasts	Facebook Messenger	WeChat
	234	225	172	78	65	8	20	1	3

Of these social media accounts, follower numbers vary in expected ways. Looking at Twitter, of the three integrity agencies utilising this platform (only the Victorian Inspectorate is absent), the number of people following integrity agencies range from just over 1000 to

⁴ Office of the Victorian Information Commissioner. (2018). Social media and privacy: Frequently asked questions. Retrieved 28 September, 2020, from <https://ovic.vic.gov.au/resource/social-media-and-privacy-faqs/?highlight=social%20media>

⁵ <https://careers.vic.gov.au/victorian-public-sector>

3,400 (see Table 2). While some agencies have found success in using Twitter as an engagement platform with the public (notably many policing agencies across the country), weak networking is not unexpected given the relative usage of Twitter by the average social media user in Australia. Facebook remains the leading social media site for overall active engagement with Australians⁶ (note: this engagement does not acknowledge generational differences, with increasing losses of younger users to visual-based platforms such as Instagram and TikTok).

Used well, social media can build a stronger community presence, identity and reputation. It may show an integrity agency is seeking to be transparent and gain public trust and support by using a medium open to public scrutiny. Despite early reticence, police services around Australia have embraced social media and built relatively large followings and support, despite the presence of potentially hostile and critical public (see Table 2 below).

Table 2: Twitter followers

Victoria		Australia		International	
Agency	Followers	Agency	Followers	Agency	Followers
IBAC	3.2k	NSW ICAC	0.4k	NYC DOI	9.1k
		SA ICAC	1.0k	UK SFO	3.7k
		Qld CCC	1.2k	NZ SFO	0.8k
		WA CCC	0.5k		
		Tas IC	-		
Victorian Ombudsman	3.4k	C'wth	3.5k	Ireland	2.5k
		NSW	0.9k		
		Qld			
Victorian Inspectorate	-	Qld Integrity Commission	0.1k		
OVIC	1.1k				
Victoria Police	262.9k	Police			
		ACT	40.9k	LAPD	197.5k
		AFP	38.7k	NYPD*	205.4k
		NSW	182.9k	London Met	1.2m
		NT	8.1k	RCMP	248k
		Qld	205.8k	NZ	82.9k
		SA	152.1k		
		Tas	13.4k		
		WA	83.5k		

* This figure is the total for several official NYPD twitter handles. As an illustration of the duality of social media, the handle @NYPD has been appropriated by the Black Lives Matters movement.

Data: Search of www.twitter.com on 29 September 2020

⁶ 2020 Yellow Social Media Report (<https://www.yellow.com.au/social-media-report/>)

The data in Table 2 demonstrates a marked difference between agencies locally, nationally and internationally. The London Metropolitan Police's Twitter account reaches 1.2 million of a population of 8.9 million, thus potentially speaking to an audience of one in seven residents. In Australia, ACT Policing reaches approximately one in ten residents. Victoria Police reaches one in 25 via Twitter. Combined, the Victorian integrity agencies only reach (at a maximum) one in 870 residents or one in 39 public employees. More can be done by integrity agencies, not just in Victoria, but nationally, in this space.

The relevance of social media engagement for integrity agencies is twofold: providing educational outreach likely to have better impact than traditional media; and acting as a preventative tool through both awareness raising and as a reporting mechanism.

Through engaging, communicating and reputation building, agencies can have more capacity to use the social media space as a means of influence. For example, it could use social media to educate the public and enlist support to prevent corruption.

- **Reputation building** - being active on social media has the potential to shift or reaffirm an agency's standing. It shows they are contemporary parts of society, willing to risk scrutiny, and want to engage publicly. Social media provides the public with accurate information on what integrity agencies do and reinforces the message that corruption and misconduct will not be tolerated.
- **Corruption Prevention** – an increased social media presence may act as a deterrent and cause public officers to reconsider involvement in corrupt activity.

While social media is largely uncontrollable in one sense, it is also very controllable as integrity agencies can choose exactly what information to communicate and when to communicate to its audience – in effect making the news.

Aside from engagement with the broader public, some social media tools could be used to generate interest from targeted groups. For example, a YouTube channel does not require a commitment to follow a source, but its content may be accessible to all web users. Courts, Royal Commissions and integrity agencies already broadcast live hearings. This highlights the ability integrity agencies and bodies have to literally make the news.

Risks associated with using social media

There can be problems adapting social media communications to existing culture and structure. For example:

- **Timeliness** is a key element to social media communication. If it happened yesterday and it's been communicated elsewhere, uploading on social media is not beneficial. Having long approval processes or only using social media for re-communicating information (media releases, reports to Parliament) will have limited benefit.
- **One-way information** can be damaging, social media is two-way.

- **Informal language** is the norm for social media. Integrity agencies have legal obligations and duties which may temper the more relaxed style. This is a balancing act each agency needs to perform for itself. Police services often provide a good example of changing the language used in social media communications, even to the extent that the police incorporate humour into some posts.
- **Individual criticism** can be disseminated very effectively via social media. Therefore, timely risk assessment and management processes need to be in place (e.g. the use of filter and pre-moderation). Methods to address negative comments - such as mass-produced responses or deleting negative comments - may appear to protect reputation but on social media platforms, it may be more harmful.
- **Public criticism** of integrity agencies through social media presents a risk. How they choose to respond could improve credibility or leave them exposed to further criticism.
- Reaching a **specific target group** will be considerably more difficult and may be quite costly when compared to the number of users it attracts.
- **Loss of privacy** or social media impacting operational activities
- **Loss of control** can be a risk factor with social media, as communicating a message is impacted by the participatory environment.
- **Resourcing** needs to be sufficient. In a 24/7 operating environment this can place considerable demand or increased risk during periods that are unmonitored.

Risks associated with not being involved in social media

The public sector employee demographic is getting younger and the proportion of active social media users is growing. It is only a matter of time before Victoria's integrity agencies are actively investigating systemic serious misconduct and/or corruption associated with the (ab)use of social media. Evidence of this risk is apparent in the recent exposure of the Instagram account "State Sanctioned Violence", purportedly run by current and former soldiers and members of defence.⁷ Active engagement with social media can build an appropriate skill set within an integrity agency to meet these challenges.

An increased use of social media by the Victorian integrity agencies should be considered in their educative and prevention programs. Social media, even with acknowledgement of potential risks, offers great opportunities to communicate the reputation of the agencies, to further the reach of education programs already in existence, to raise awareness of the laws and policies surrounding potential corrupt activities, and to highlight ways in which suspected corruption can be reported and acted upon.

⁷ <https://www.abc.net.au/radio/programs/the-signal/state-sanctioned-violence/12623084>