

TREASURY BOARD OF CANADA SECRETARIAT DETAILED ACTION PLAN
to the recommendations of the Oversight of Government of Canada Advertising of the Spring 2019 Reports of the Auditor General of Canada

| Report Ref. No. | OAG Recommendation | Departmental Response | Description of Final Expected Outcome/Result | Expected Final Completion Date | Key Interim Milestones (Description/Dates) | Responsible Organization/ Point of Contact (Name, Position, Tel #) | Indicator of Achievement (For Committee Use Only) |
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| 4.32 | The Treasury Board of Canada Secretariat should consider a risk-based approach to identify which advertising campaigns have a higher risk for partisanship and should be sent for external review. The approach should consider factors such as timing, audience reach, subject matter, and cost. | Agreed. As part of the threshold review already underway in response to the Standing Committee on Government Operations and Estimates, the Treasury Board of Canada Secretariat will complete an analysis of other factors by May 2019 and modify the current requirements for mandatory external reviews by September 2019. | Analysis of other factors. Amendment to mandatory requirements for an external review of advertising. | February – March 2020 (complete) | <p>To support the review of the current threshold for mandatory reviews of advertising creatives, TBS:</p> <p>(May 2019)</p> <ul style="list-style-type: none"> - reviewed recent GC advertising annual reports to determine dollar-based threshold required to reach various percentages of annual GC ad budget - analyzed other risks factors and similar oversight approaches in other jurisdictions (e.g. Australia, Ontario, etc.) to determine approaches for oversight <p>(June – December 2019)</p> <ul style="list-style-type: none"> - developed options for new threshold - consulted with internal and external stakeholders regarding the proposed approach <p>(February – March 2020)</p> <ul style="list-style-type: none"> - informed departments that the threshold for mandatory external reviews was lowered from \$500,000 to \$250,000 (effective April 1, 2020) - posted information on Canada.ca | <p>Kelly Acton Assistant Secretary</p> <p>Strategic Communications and Ministerial Affairs (SCMA)</p> <p>613-850-3099</p> | |

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| 4.43 | The Treasury Board of Canada Secretariat should ensure that Ad Standards documents the rationale for its assessments of government advertising campaigns against all non-partisanship review criteria. | Agreed. The Treasury Board of Canada Secretariat has already begun to establish a process for Ad Standards to better document the rationale used when determining whether advertising meets or does not meet the review criteria. This process will be in place by June 2019. | Revised process for ASC to better document rationale used in ad reviews. | June 2019 (complete) | <p>To ensure that Ad Standards better documents their rationale for determining whether advertising creatives align with the established criteria, TBS:</p> <p>(May-June 2019)</p> <ul style="list-style-type: none"> - released a new evaluation form that Ad Standards uses to assess advertising creatives and provide rationale for their determinations. It includes more detailed criteria for each of the items outlined in the definition of non-partisan communications along with new attestation requirements for heads of communications - the form was developed in consultation with PSPC, and Ad Standards - met with Ad Standards to outline expectations about documenting their findings - informed heads of communications and the advertising community of changes | <p>Kelly Acton Assistant Secretary</p> <p>Strategic Communications and Ministerial Affairs (SCMA)</p> <p>613-850-3099</p> | |
| 4.46 | The Treasury Board of Canada Secretariat should assess the appropriateness and application of the two-step process to ensure that it is effective and meets its intended purpose. | Agreed. The Treasury Board of Canada Secretariat will conduct an analysis of the current two-stage process to ensure that it is achieving the intended results. Modifications will be made as required by September 2019. | Analysis of the current two-stage review process with amendments, if necessary. | September 2019 (complete) | <p>To assess if the current two-stage review process is meeting its intended purpose, TBS:</p> <p>(May-August 2019)</p> <ul style="list-style-type: none"> - analyzed a sample of reviews (digital and traditional media) to determine the duration of time between initial and final reviews - engaged with various departments to find out at what point in the production process the creatives were submitted to Ad Standards <p>(September 2019)</p> <ul style="list-style-type: none"> - completed analysis and determined amendments to the process are not required - posted additional guidance on Canada.ca to help departments better plan their involvement in the review process | <p>Kelly Acton Assistant Secretary</p> <p>Strategic Communications and Ministerial Affairs (SCMA)</p> <p>613-850-3099</p> | |

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| 4.59 | The Treasury Board of Canada Secretariat should improve its monitoring of reviews of government advertising campaigns. The Secretariat should monitor whether Ad Standards is thoroughly and consistently applying all non-partisanship advertising review criteria in its reviews. The Secretariat should provide guidance on the interpretation and application of criteria on the basis of the findings of its monitoring activities. | Agreed. The Treasury Board of Canada Secretariat will enhance its internal monitoring process by establishing methodology that will assess Ad Standards' application of the review criteria. The Treasury Board of Canada Secretariat will develop necessary guidance to ensure Ad Standards consistently applies all criteria. This will be completed by September 2019. | Improved internal monitoring process. Guidance developed to improve how ASC is applying the established criteria to their reviews, if necessary. | September 2019 (complete) | To enhance internal monitoring processes, TBS: (May – August 2019) <ul style="list-style-type: none"> – developed a methodology to assess Ad Standards reviews – examined a sample of Ad Standards' reviews to assess their application of the review criteria – determined that no further guidance for Ad Standards is needed | Kelly Acton Assistant Secretary Strategic Communications and Ministerial Affairs (SCMA) 613-850-3099 | |
| 4.62 | The Treasury Board of Canada Secretariat should ensure that there is an independent and objective process to receive, review, and respond to public complaints about partisanship in government advertising. | Agreed. While the Treasury Board of Canada Secretariat has not received any public complaints during the audit period, it will look at options, including the feasibility, for establishing an independent review process to address any future complaints about partisanship in government advertising. An assessment of options will be completed by December 2019. | Analysis of options for receiving, reviewing and responding to and tracking public complaints. | December 2019 (complete) | To assess the feasibility of putting in place an independent public compliant review process, TBS: (July – December 2019) <ul style="list-style-type: none"> – undertook research and analysis of public complaint mechanisms in federal departments and other jurisdictions in Canada and abroad (e.g. UK, Australia, Ontario, etc.) – current avenues for Government of Canada-led advertising are Ad Standards and PSPC, but are not specific to partisan/non-partisan complaints – TBS is not involved in decisions related to advertising planning and production – in addition, TBS put in place a pilot project to accept, review and report public complaints on partisanship in GC advertising – TBS made this information available on Canada.ca – no complaints have been received to date | Kelly Acton Assistant Secretary Strategic Communications and Ministerial Affairs (SCMA) 613-850-3099 | |