

Australian Nursing and Midwifery Federation

**CONSULTATION PAPER ON THE  
AUTHORISATION REQUIREMENTS  
FOR ELECTORAL COMMUNICATIONS**

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Australian  
Nursing &  
Midwifery  
Federation



## Introduction

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 295,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

The ANMF welcomes the opportunity to provide a response to the Australian Electoral Commission's '**Consultation paper on the authorisation requirements for electoral communications**'.

The ANMF is registered as a political campaigner under the *Commonwealth Electoral Act 1918* (the Act) and has published numerous "electoral matter" communications subject to authorisation requirements of the Act, largely due to the ANMF's aged care campaign. It is with this experience that the ANMF provides the following responses to the AEC consultation paper:



### 3.1 Authorisation of printed electoral communications and the 20/20 requirement

- **How should the requirements ensure the legibility of authorisations on printed materials?**
- **Is there a way to set a minimum font size for authorisations (e.g. to require authorisations to be no smaller than the other largest text used in the communication)?**

The current rules concerning authorisation of printed electoral communications are too subjective in stating that printed material must be “in a font size that can be read by a person with 20/20 vision without the use of any visual aid”. Whilst not endorsing any particular solution to this problem, the ANMF believes that the solution the AEC establishes must make the requirement simpler to understand and be more objective. It should also take into account the size of the medium being used for the printed electoral communication.

### 3.4 Electoral images or videos that will be circulated on social media

- **Is it sufficient for electoral images or videos on social media to include a link to an authorised social media page (e.g. of the political entity that created the communication)?**
- **Would it be clearer if electoral communications on social media containing images or videos that are likely or intended to be shared be required to have an imbedded authorisation?**

The ANMF is opposed to any move that would change the current requirements concerning authorisations on social media, which allow the authorisation particulars in the bio or about section of our social media pages. This is a simple rule to follow that allows disclosure entities to ensure that they meet the electoral communication requirements of the Act.

When the ANMF chooses to post electoral communication to another entity’s social media page it ensures that the authorisation is embedded in the video or image itself or there is a link to an authorised social media page. However, this is rarely necessary as nearly all electoral communication is directly on the Twitter or Facebook pages run by the ANMF and its branches.



Embedded authorisations would not solve any problems concerning electoral communication. Once an image or video is published it can be manipulated by anyone for any purpose. Requiring all electoral communications to have embedded authorisation can be easily circumvented if an individual chooses to do so, by using simple video editing software freely available on the internet. For example, a post could be downloaded, edited and re-uploaded by another entity, with the original authorisation intact. This may give electors the impression that a doctored post has been authorised by a party that has not authorised it.

### 3.5 Ability to include a URL to a website if authorisation particulars are too long for certain text or electronic electoral communications

- **Are the authorisation requirements in section 321D(5) for a text or electronic electoral communications too onerous or too long?**

In their current form the authorisation requirements under the section 321D(5) of the Act are too onerous in requiring the full legal name, location and authorised person. For the ANMF an authorisation must read as approximately “authorised by A Butler, Australian Nursing and Midwifery Federation, Melbourne”, amounting to 78 characters and spaces. If this requirement allowed abbreviations it becomes “authorised by A Butler, ANMF, Melbourne”, which is 39 spaces, exactly half the number of characters and spaces.

If the ability to use URLs for electronic electoral communications is removed (which the ANMF does not advocate for) then other options are needed for disclosure entities, such as using abbreviations for legal names.

- **Is it sufficiently transparent to enable an authorisation for a text or electronic electoral communications to be a hyperlink to an authorised website?**

Due to space constraints of SMS messages and Twitter tweets the ANMF considers that a hyperlink is sufficiently transparent to enable authorisation, as most mobile phone users are aware of the limitations of SMS messages and tweets. However, with respect to most other forms of electronic electoral communication which do not have constraints on the number of characters, such as email, a full authorisation should be mandated.



- **Is a hyperlink to an authorised website necessary for all the text message or electronic electoral communications listed in section 9 of the Authorisation Determination?**

A hyperlink for all electronic electoral communication is far too broad and unnecessary. For example, the ANMF authorises social media electoral communication by placing the authorisation particulars in the bio or about section of our social media pages.

Hyperlinks should be limited to circumstances where entities cannot use another method due to space constraints and (where applicable) there is no authorisation on the social media page itself.

- **How can the risk of scam text or electronic electoral communications with harmful hyperlinks be reduced?**

The Commonwealth Government should run a public education campaign on scam texts and other electronic communications. These forms of communication are common in society in general and not just limited to Commonwealth elections.