Review of online content management at Our Watch

Department of Social Services

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1   Executive Summary

Nous Group (Nous) was commissioned by the Family Safety Branch of the Department of Social Services (the Department) to conduct a review of the quality assurance, vetting and approval processes and practices for content published and hosted on the Commonwealth funded Our Watch online platforms. Specifically, the platforms in scope for this review were the Our Watch website (ourwatch.org.au), the *Doing Nothing Does Harm* campaign website (doingnothingdoesharm.org.au), the *No Excuse for Abuse* website (noexcuseforabuse.org.au), the *Media Making Change* website (media.ourwatch.org.au) and *The Line* campaign website (theline.org.au), as these websites and associated social media activity are wholly or partially funded by the Commonwealth.

Governance and risk management in relation to online content management is critical to ensure that Our Watch can deliver services in line with its purpose of driving nationwide change in culture, behaviours and power imbalances to prevent violence against women and their children. This review has provided an opportunity to take stock of current practice and identify possible improvements to the assurance of Our Watch's online content on relevant platforms. Additionally, it has considered how the Department can work with Our Watch through its funding arrangement to manage risk without increasing administrative or reporting burdens.

Noting that Our Watch is currently undertaking a program of work to improve its digital practice including risk management, this review makes a series of additional recommendations for actions that can be taken by both Our Watch and the Department to strengthen governance and reduce risks associated with online content. These recommendations present an opportunity to align the parties' practice and expectations regarding risk management and improve project management processes to provide greater assurance to all parties. The observations and recommendations contained in this report have been made based on current practice, and recommendations have been designed to be accommodated within current practice to the greatest extent possible.

This review makes 15 key recommendations

Risk management recommendations

Our Watch has existing processes for identifying and reporting on risks. However, there is a lack of alignment between the Department's approach to risk management and the risk management architecture currently in place for Our Watch. Additionally, there is a lack of clarity as to the application of risk management frameworks and lack of consideration of risks in Our Watch's work beyond initiating identification.

Recommendation 1.1

Our Watch should continue to work collaboratively in interdisciplinary teams to identify project risks.

Recommendation 1.2

Our Watch should ensure that all internal risk frameworks within a project are aligned with one another and with risks identified in the Activity Work Plan (AWP) to facilitate uniform reporting on risk.

Recommendation 1.3

Our Watch should require explicit mitigation actions and specific responsibility for these actions to be recorded within risk management tools.

Recommendation 1.4

Our Watch should develop and provide internal guidance in relation to undertaking a risk assessment.

Recommendation 1.5

The Department should consider playing a more active role in determining the dimensions of risk to be considered by Our Watch within a given project. In this regard, the Department could consider developing an internal document which identifies these dimensions as a frame of reference for all projects. This document may consider the findings of the concurrent project investigating the appropriateness of content for audience.

Recommendation 1.6

The Department should consider whether particular types of content, to be agreed between the Department and Our Watch, should be automatically flagged as high-risk on the basis of the findings of the concurrent project investigating the appropriateness of content for audience.

Recommendation 1.7

The Department should consider requiring that the risk assessment process in the AWP include the explicit rating of residual risks.

Project management and approvals recommendations

Our Watch has existing processes for project management and approvals, however this review demonstrated that these procedures are subject to a degree of ambiguity. Additionally, Our Watch may rely too heavily on collaborative principles in lieu of establishing clear responsibilities for approvals.

Recommendation 2.1

Our Watch should work to clarify the nature of reviews that occur at each stage of the Reporting Schedule and Approvals Process in relation to website and social media content to provide clarity to staff about the degree of responsibility for quality assurance.

Recommendation 2.2

Our Watch should work to clarify the application of the Reporting Schedule and Approvals Process to ensure clarity around final decision points and decision makers.

Recommendation 2.3

Our Watch should consider embedding the Reporting Schedule and Approvals Process within the Digital Services Guide, to provide an explicit escalation process to collaborative teams for the approval of content, while maintaining its collaborative framework.

Recommendation 2.4

Our Watch should consider embedding a 'Deployment Checklist' within the Digital Services Guide which requires staff uploading content to Commonwealth funded platforms to confirm that appropriate reviews have occurred prior to upload to websites or social media.

Recommendation 2.5

The Department should consider whether to require the inclusion of Our Watch approvals processes and/or a Deployment Checklist for content uploaded to websites and social media into AWPs as a project deliverable for high-risk activities.

Recommendation 2.6

The Department should consider requiring additional reporting and assurances of reviews through the AWP in cases where content is assessed by the Department as being high-risk.

Monitoring and review recommendations

Monitoring and review of online content should be prioritised as a means of ensuring that content is appropriate and remains appropriate while it is available on Our Watch platforms.

Recommendation 3.1

The Department should consider incorporating a requirement for regular review of historical content on websites and social media into the AWP for future work on the yearly schedule currently undertaken by Our Watch.

Recommendation 3.2

The Department should consider, on a case by case basis by reference to the circumstances of individual projects and campaigns, whether to prescribe more frequent reviews of high-risk content hosted on websites and social media than the existing yearly schedule.