



CASE REPORT

Case No:	K/010
Complaint:	Use of public funds for the promotion of personal social media pages of Ministers and Parliamentary Secretaries.
Complainant:	Christian Peregin, Chief Executive Officer, Lovin Malta
Complaint Date:	14 August 2019
Report Date:	7 May 2020

The Complaint

1. On 14th August 2019, I received a complaint by email from Mr Christian Peregin, Chief Executive Officer of Lovin Malta (the Complainant), requesting me to investigate whether taxpayer funds are being used by ministers and parliamentary secretaries for the administration of their personal social media pages and advertising on said pages (email attached and marked Document A).
2. The email (the Complaint) consisted of four points. In his **first point**, the Complainant states as follows:

"...Practically every Ministry and Parliamentary Secretariat (e.g. Office of the Prime Minister, Ministry of Tourism, Ministry of Equality, Ministry of Transport, Ministry of Health etc) no longer has its own official social media pages. Instead, these entities promote their work through the personal pages of the ministers or parliamentary secretaries. This means that when taxpayer money is used to buy Facebook advertising on behalf of a ministry, the page running the campaign and getting the added promotion is the personal page of the politician rather than the ministry itself.



3. The Complainant argues that this situation blurs the line between the political and the personal, making it difficult for taxpayers to judge whether public funds are being truly used in the public interest. Furthermore, *“when a minister is replaced, the ministry must start building a new audience from scratch instead of inheriting the foundations of the previous minister. Instead, all the likes and followers collected through taxpayer money can be enjoyed by the minister on a personal & political basis.”*

4. In connection with the same point, the Complainant refers to a story carried by Lovin Malta on 12 April 2018, in which it was reported *inter alia* that *“Excluding money spent to market Malta overseas, the government spent at least €1.28 million of public funds on social media ads alone between March 2013 and September 2017”*.¹ The Complainant goes on to state that *“Prime Minister Joseph Muscat had promised to create guidelines for ministers following our story back in April 2018, but the situation has since remained the same and the guidelines never materialised.”*

5. In his **second point**, the Complainant argues that *“... there are no ‘best practice’ guidelines in terms of how advertising budgets should be allocated by public entities. If the government decides to spend all of its advertising money on One News or Facebook, it is free to do so.”* The government is using its freedom in this respect to spend *“a disproportionate amount of advertising money on social media”*. While this might be justifiable in terms of effectiveness, such advertising should be *“better regulated to ensure taxpayer money is really being used in the interests of taxpayers and not in the personal interests of individual politicians.”*

6. In his **third point**, the Complainant states that *“... some government entities are using news organisations as third parties to buy and produce their advertising campaigns. This means that these organisations are taking a commission off every advert bought on behalf of government.”* The Complaint notes that there is *“little to no transparency around this situation”*, and calls for publicly-funded advertising to be regulated and transparent.

7. In his **fourth point**, the Complainant states that, in the absence of advertising regulation, *“paid-for sponsored content does not need to be legally*

¹ <https://lovinmalta.com/news/prime-minister-pledges-transparency-in-maltese-governments-social-media-ads/>.



declared as such” Taxpayers therefore have no way of knowing about such transactions or identifying the content in question as being paid-for content rather than editorially-generated content. The Complainant acknowledges that this applies to content paid for by the private as well as the public sector. However, he argues that politicians “should be acting as transparently as possible to show leadership to the private sector but instead they are taking advantage of the regulation they refuse to create.”

Decision to Investigate

8. The **first point** in the Complaint is closely related to a case I have already investigated, which concerns the use of Facebook by the then-Minister Konrad Mizzi. In that case I found that the line between public and private spheres in the use of social media was blurred, to the point where the Minister had mistakenly included his own private Facebook page in a reply to a parliamentary question as one of the pages administered by the Ministry for Tourism. I concluded that:

“... ministers should avoid using ministry resources to produce material for their own social media accounts, even if such material is directly related to their ministerial work. It is one thing adding a link to, say, an activity that was filmed using publicly funded resources and disseminated through other channels, and quite another to use public funds to produce a feed for an activity exclusively for the purpose of including it in the minister’s personal Facebook page.”²

9. Paragraphs 4.9, 4.10, 5.3 and 7.4 of the Code of Ethics for Ministers and Parliamentary Secretaries, as set out in the second schedule of the Standards in Public Life Act (chapter 570 of the laws of Malta, hereinafter referred to as “the Act”), appear relevant to this aspect of the Complaint. These provisions are reproduced hereunder:

4.9 Ministers shall keep their roles as Ministers and as Representatives separate, as well as their role as a member of a political party.

² Report on case K/008 (2 December 2019), paragraph 35. Available from <https://standardscommissioner.com/case-reports/>.



4.10 Ministers shall respect the principle of political impartiality of the public service.

5.3 Diligence – once Ministers administer public property, on behalf of the public in general, they shall exercise the highest level of diligence including in the expenditure of public funds, and they shall also work diligently and hard in the performance of their duties.

7.4 Ministers shall respect the impartiality of the public service and shall ensure that their influence on the public service is not abused. ...

10. The **second point** in the Complaint relates to the targeting of government advertising expenditure towards specific media. In principle, there is nothing wrong with the government focussing its advertising expenditure, provided that this is done in the public interest with a view to reaching the intended target audience more effectively. The Complainant acknowledges this but calls for the regulation of government advertising to ensure that public funds are being spent in the public interest and that no political discrimination is taking place. This argument has merit, but in the absence of a specific allegation concerning misuse of funds or discrimination, it does not constitute grounds for an investigation under the Act.

11. The **third point** is a matter of public procurement. There is nothing intrinsically wrong in the procurement by the government of the services of third parties as public relations agents, provided that this is done for reasons of public interest. In the absence of a specific allegation to the contrary, there are again no grounds for investigation under the Act.

12. The **fourth point** is a question of ethics for the media rather than state actors. If, as alleged by the Complainant, the media accepts payment for the publication of content without identifying it as sponsored content, this is the media's responsibility. The Act does not empower me to enquire into the conduct of the media. Whether or not the media should be regulated by law in this regard is a matter of public policy which lies outside my remit, so it is not for me to pronounce myself on this issue.

13. In the light of the foregoing, I have decided that the first point in the Complaint falls within my competence in terms of article 13(b) of the Act and warrants further investigation. The focus of my investigation for the purpose of this report is therefore on whether the use by ministers and parliamentary secretaries of social media, particularly Facebook, respects an appropriate



dividing line between the public sphere on one hand and the private and political spheres on the other.

Investigation Procedure

14. While the Complainant stated that he wanted the position of all ministers and parliamentary secretaries to be investigated, he did not make a specific allegation against any of them by name. I have therefore decided to treat the Complaint as being about general practice and to conduct my investigation accordingly, rather than to focus on specific instances of misconduct by individuals, although my findings in this case report are illustrated by means of examples from the Facebook accounts of specific individuals.

15. This is the second instance in which I am focussing my investigation on a general practice rather than on individuals. The first case in which I adopted this approach concerned the government practice of engaging backbench members of Parliament as consultants, persons of trust and members of official boards.³ I believe that this earlier case has proved the value of such an approach on my part.

16. Information was compiled from publicly accessible social media sources to establish the existence of social media pages. An analysis of the content of the personal social media pages of some members of Cabinet was also carried out in order to deduce general trends of the contents of the published materials and to determine the way social media is used in practice. This content analysis was carried out with respect to December 2019 and January/February 2020 so as to take account of the formation of a new Cabinet and to consider practice under both the old and the new Cabinets.

17. I also noted comparative data from other European countries and international bodies such as the Organisation for Economic Cooperation and Development (OECD) and the Council of Europe, so as to see how social media is used by official entities and officials in their personal capacity and where the line between official and personal use is drawn.

³ See report on case K/002, issued on 5 July 2019. Available from <https://standardscommissioner.com/case-reports/>.



18. Reference was made to the official policy and guidelines on the use of social media in the Public Service, as issued on 14 December 2015 by means of OPM Circular 21/2015, as well as those standards that have been implemented in other jurisdictions, notably Canada, the United Kingdom and South Africa.⁴

19. A random sampling of posts by five ministers in their personal Facebook accounts was made for the purposes of this investigation. On 4 March 2020 letters were sent to the ministers in question seeking further information about their Facebook posts, notably whether the content of the post had been produced using public resources, and whether that content had been published through any official channel before being uploaded to Facebook. The letters are attached to this case report as Documents B to F. Each minister was requested to reply by 10 March 2020.

20. On 10 March 2020 the Hon Glenn Bedingfield MP, Government Whip, wrote to me on behalf of the ministers to seek an extension to the timeframe for their replies. An extension to 17 March 2020 was duly given. Notwithstanding this, I have received replies only from Minister Owen Bonnici, who replied promptly on 4 March, and Minister Edward Scicluna, who replied on 24 March. These replies are attached as Documents G and H respectively.

21. On 3 April 2020 I held a meeting with Mr Bedingfield and Minister Edward Zammit Lewis at their request. They presented the text of a proposed addition to the code of ethics for ministers and parliamentary secretaries covering among other things the use of social media. I was asked if I found this text satisfactory: I did, and I said so.

22. At the meeting, it was also agreed that I would forward to Mr Bedingfield and Mr Zammit Lewis a set of guidelines on the use of social media which I had prepared for inclusion in this report, which was already in partial draft form at the time. These guidelines, which are discussed later on this report, were subsequently agreed to by the government.

23. I also insisted during the meeting that those ministers who had yet to reply to my letters of 4 March 2020 should do so. Nevertheless, I have decided that I should not delay this case report any further and I am therefore

⁴ South Africa introduced a comprehensive social media policy guidelines in 2011. See https://www.gcis.gov.za/sites/default/files/docs/resourcecentre/guidelines/social_media_guidelines_final_20_april2011.pdf.



concluding the case in the absence of the replies in question. I have drawn conclusions as appropriate on the basis of the information available.

Considerations

24. Social media platforms have transformed the way in which people communicate and share information. Presence and activity on social media is no longer a question of choice for most governments, but is now a necessity. The use of social media tools occupies a prominent place at all levels – international, national and subnational – in government around the world.

25. As a result, government institutions are becoming more active on social media. The main executive institutions in 26 out of 34 OECD member countries operate a Twitter account; and they maintain a Facebook page in 21 out of 34 countries.⁵

26. Generally speaking however, governments tend to lag behind individuals and politicians in the use of social media. Political personalities like heads of state or heads of government, ministers and members of parliament have been quicker to exploit social media. Social media is today a standard component of a politician's arsenal for campaigning, rallying and fund-raising.

27. Some state and government leaders are very popular on social media, much more so than the official accounts of the institutions they represent. An OECD study shows that on Twitter the average government leader counts at least four times as many followers as the average institutional account for the head of state or government.⁶ Higher social media popularity of personalities as opposed to institutions relates to the expectations of many social media users to interact with "real" identifiable people. Political leaders have a direct personal incentive to exploit social media since they can reap tangible returns in terms of influence, funds, support and votes; and this is where the problems begin, as official activities on social media can be channelled through the personal accounts of politicians rather than through the pages of the institutions they lead.

⁵ *Social Media and Use by Governments*, OECD Working Paper on Public Governance no. 26 (undated), p. 2.

⁶ *Ibid*, p.2.



28. This raises questions about whether public funds and resources are being used legitimately in the public interest or whether they are being used for personal and political ends. A lack of clear policy guidelines on social media use can lead to open or concealed abuse of public resources for personal and political gain.

29. The trend in Malta seems to be in line with international developments. My analyses of local practices show that ministers and parliamentary secretaries have personal Facebook and Twitter pages, but not all ministries (as institutions) follow suit. For the purposes of my investigation, information was evaluated on the use of social media in June 2019 and January/February 2020.

30. In June 2019 there were fourteen ministries in total, out of which four ministries had active Facebook pages:

- Office of the Prime Minister – @MaltaGov
- Ministry for Education and Employment - @edukazzjoni
- Ministry for Energy and Water Management - @MEWM
- Ministry for Foreign Affairs and Trade Promotion - @MFAMalta

31. The Ministry for the Family, Children’s Rights and Social Solidarity had an inactive Facebook page. The remaining nine ministries did not have Facebook pages.

32. Three ministries had active Twitter accounts – the Office of the Prime Minister, the Ministry for Education and Employment, and the Ministry for Foreign Affairs and Trade Promotion. The remaining eleven ministries did not have Twitter accounts.

33. The Ministry for Education and Employment seemed to have the most comprehensive ministerial social media policy. In its Facebook page the Ministry elaborated on the purpose of its social media use and set out clear terms and conditions of use, which aimed among other things to ensure respect and avoid hatred and abuse.

34. In January 2020, following the appointment of a new Cabinet, the situation remained similar.



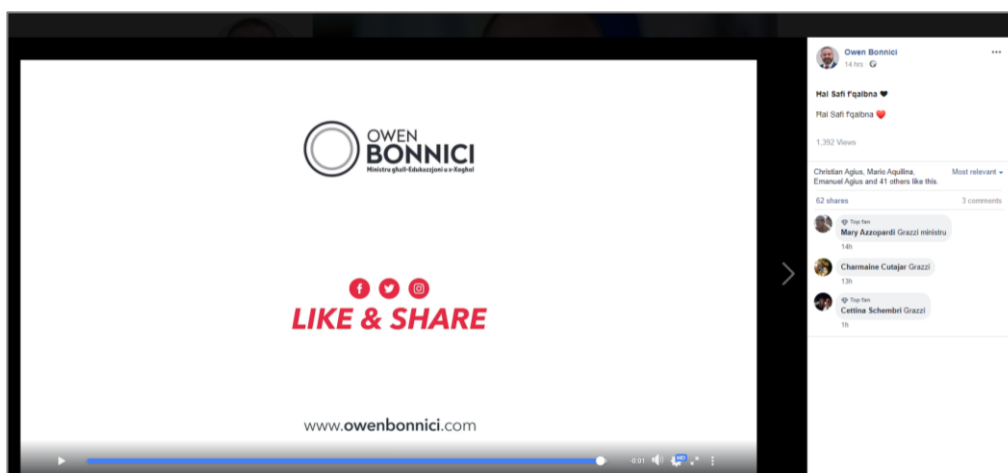
Examples of the use of social media

35. My review of social media use by ministers and parliamentary secretaries has revealed cases of both good and bad practice. Examples are given below.

Example 1



36. This example consists of a video of the opening of a centre for persons with dementia in Ħal Safi. The video was posted by Minister Owen Bonnici in his personal Facebook page. The video ends with the Minister's personal logo, as shown below:



37. Minister Bonnici explained this post by means of his email of 4 March 2020, which is reproduced in full as Document G. Among other things he stated that:



“I strictly distinguish between the work I perform as a Member of Parliament and the work I perform as a Government Minister. With respect to issues relating to communications, I have a particular logo and brand for the work I perform as a Member of Parliament (as evidenced by www.owenbonnici.com) and a distinctive logo and brand for the work I perform as a Government Minister (as evidenced by www.education.gov.mt);

Any material on social media relating to my role as Member of Parliament is not financed by public funds, while any material relating to my role as Government Minister is financed by public funds;

With regards to social media videos relating to my portfolio as Minister for Education and Employment, these are financed by public funds and are uploaded on social media sites carrying the branded name “Edukazzjoni” (and previous to that “Arti u Kultura” or “Gustizzja”). I subsequently share them on my personal Facebook pages in order to reach wider audiences.

Any social media videos relating to my function as Member of Parliament representing a particular district, are not financed by public funds. They are not uploaded on the social media sites carrying the branded name “Edukazzjoni”. They of course do not carry the Government branding but, instead, are particularly plain and very simple. They are uploaded on my Facebook sites.

With regards to the particular Facebook clip relating to the dementia centre in Safi, it related to my attendance to an event where the Parliamentary Secretary responsible for the Elderly presided over a ceremony where the Government and the Church signed a document which will serve as a basis for the development of a dementia centre in the old MUSEUM building in the middle of Safi. I was invited there along with the rest of the Labour MPs elected from the fifth district. I do not know whether rest of the MPs elected from the fifth district were invited as well since I merely received an invite by the Parliamentary Secretariat’s office who was kind enough to invite me for the event

Since this dementia centre is very important to my constituents of the fifth district, I decided to see that a simple, short video covering the



ceremony is produced and uploaded on my Facebook pages. This was not paid from public funds. ...

I never produce any content for my personal Facebook account via public resources, all resources produced via public funds are directly related to my portfolio and are published on ministry social media. Once the content is published, then I share/retweet on my public accounts.”

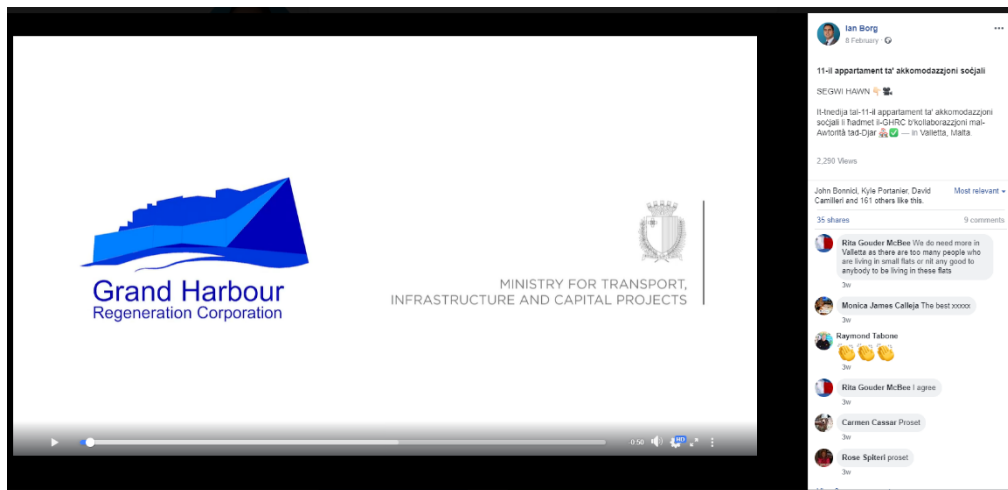
38. Given that the video clip in question was paid for using private funds, it represents an example of good practice in which a clear distinction is maintained between publicly-funded material that is used on official government social media channels and privately-funded material appearing in the Minister’s personal social media pages.

39. Minister Bonnici states that once publicly-funded content is published through an official channel, he may then share it through his own personal social media accounts. This is entirely acceptable since any person following an official social media page can share content from that page.

Example 2



40. This example concerns a video about the inauguration of social housing apartments which was uploaded to the personal Facebook page of Minister Ian Borg. The video includes the official logos of the Grand Harbour Regeneration Corporation (GHRC) and the Ministry for Transport, Infrastructure and Capital Projects, as shown in the screenshot below.



41. The use of official logos suggests that the video was produced using official resources. However, the video appears not to have been published through any official channel, indicating that it was produced specifically for Minister Ian Borg's personal Facebook page.

42. Minister Borg was asked to account for this video by means of my letter of 4 March 2020 which appears as Document C. However, the Minister did not reply. As already noted, I have decided not to delay the completion of this case report any further on account of outstanding replies. In the absence of any explanation from the Minister, I can only conclude that the production of this video represents an instance of misuse of public resources.

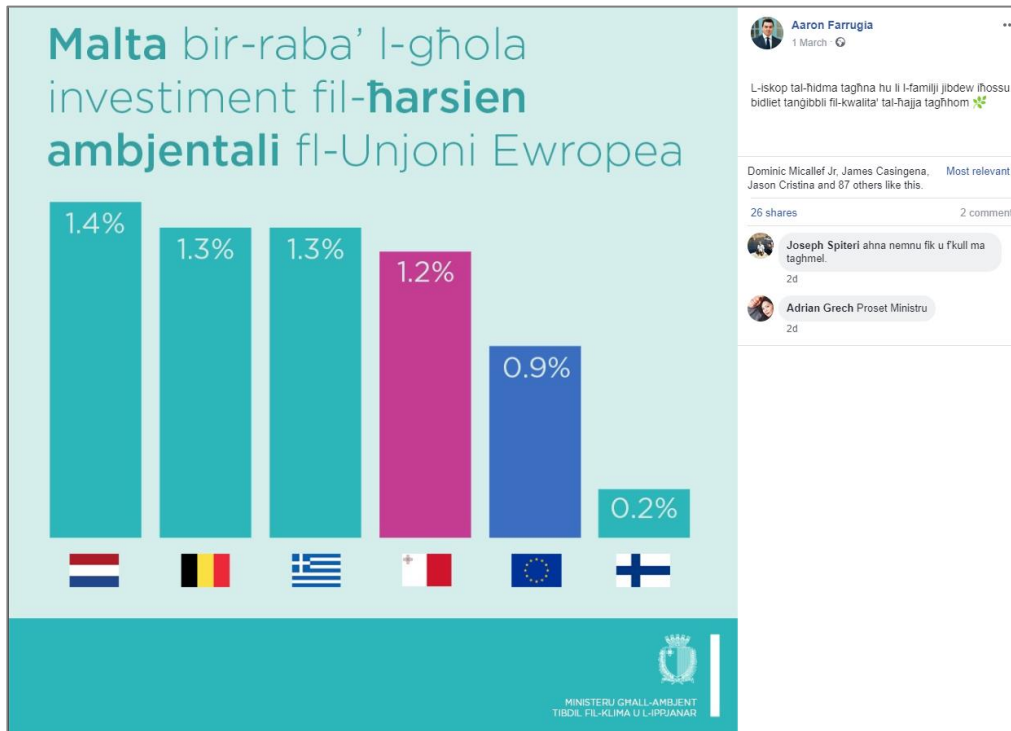
Example 3

43. This example consists of a graphic which was uploaded to Minister Aaron Farrugia's personal Facebook page. The graphic, which is reproduced overleaf, includes the official logo of the Ministry for the Environment, Climate Change and Planning, again suggesting that it was produced using public resources. As with the previous example, the graphic appears not to have been published through any official channel, indicating that it was produced expressly for use in Minister Farrugia's personal Facebook page.

44. Minister Farrugia was asked for information about the production of this graphic by means of my letter of 4 March 2020 which appears as Document D. On 25 March 2020 the Minister informed me by email that he was waiting for clarifications from Cabinet and his party's parliamentary group before replying (copy of email attached as Document I). However, I received no further information from the Minister. As in the previous example, in the absence of



an explanation from the Minister I can see no reasonable conclusion other than that the production of this graphic represents an instance of misuse of public resources.



Example 4



45. This example consists of a video of a presentation by Minister Silvio Schembri, in his official capacity, which was uploaded to his personal Facebook



page. The official logo of the Ministry for the Economy, Investment and Small Businesses appears in the video as part of the presentation, as shown below:



46. Once again, this suggests that the video was produced using official resources. Since the video does not appear on any official channel, I can only conclude that the video was produced specifically for Minister Schembri's personal Facebook page, which represents misuse of public resources. Minister Schembri did not reply to my request for an explanation.

47. The same video ends with Minister Schembri's personal logo, as shown in the screenshot below, indicating what appears to be the lack of any clear distinction between the official and personal spheres.





Example 5



48. The distinction between the official and personal spheres is still more unclear in this example, which concerns a video in which Minister Edward Scicluna appears to be speaking in his official capacity as Minister for Finance. The video is professionally produced, with introductory and concluding sequences using motion graphics, and it appears to have been shot in the Minister's office. It is one of a series of videos entitled "Fil-Fehma Tiegħi" (In My Opinion), all of which feature Minister Scicluna and follow the same format.

49. Although the screenshot reproduced above appears to indicate that the video was a live event on Facebook, the same video was uploaded to the Minister's personal channel on YouTube on 7 January 2020,⁷ two days before it appeared on Facebook. A link to the video on YouTube was added to the official website of the Ministry for Finance on 7 January 2020.⁸

50. The video was uploaded to Facebook separately, not as a link to YouTube. The video on Facebook is a slightly different version that ends with a

⁷ See <https://www.youtube.com/watch?v=7ECGhR12qJg>.

⁸ See <https://mfin.gov.mt/en/videos/Pages/videoblog291.aspx>.



graphic screen featuring the Minister's personal logo, as reproduced below. This logo does not appear on YouTube version of the same video.



51. Minister Scicluna explained this video as follows in his email of 24 March 2020, which is reproduced as Document H:

“My social media is mostly based on Facebook, Twitter, LinkedIn, Skype and my personal website. All costs including boosts and advertising have always been paid from my own personal budget.

The weekly 5 to 10 min video to inform the public of my work and explain related concepts and principles started from the first week I was elected to the European Parliament in June 2009 and all expenses have during that time been covered by the European Parliament which provides a budget for this purpose.

Once elected and appointed as Minister for Finance in March 2013 I continued the practice of explaining and informing about topics related to my work as Minister and member of parliament through this weekly video blog.

Once produced by my Ministry and uploaded on the Ministry's website it is available for others to download, copy and share to increase promulgation. This includes uploading on Youtube and Facebook.”

52. The Minister's reply is incorrect in so far as it suggests that the video was uploaded to his ministry's official website and shared from there to YouTube and Facebook. On the contrary, the ministry in effect shared through its official website a video published on Minister Scicluna's personal YouTube channel. This, together with the fact that the video was produced using public funds,



represents the complete erasure of the distinction between official and private spheres.

53. Minister Scicluna also states that his weekly videos deal with topics relating to his work as minister *and as member of parliament*. However, paragraph 4.9 of the code of ethics for ministers, as reproduced earlier in this case report, obliges ministers to keep their roles as ministers and as representatives separate.

54. It is beyond the scope of this investigation to determine whether there is a genuine need, in the public interest, to produce weekly videos about topics relating to the Minister's work, and whether this need justifies the costs involved. But it is clearly unacceptable for official resources to be used in the production of any videos that deal with topics relating specifically to Prof Scicluna's role as member of Parliament. The practice in the European Parliament, that provides members with a specific budget, is different to that of the Parliament of Malta, members of which do not enjoy the benefit of such a budget and are therefore not entitled to use official resources to produce videos about their work. Apart from the issue of misuse of public resources, this practice *inter alia* gives ministers and parliamentary secretaries an unfair advantage over other members of parliament competing on the same electoral district.

55. Leaving aside this particular issue, a video in which a minister speaks in his or her official capacity should be published through an official channel. Once it has been published officially it can be shared via the minister's personal social media channels, but the latter should not be the primary avenue through which the video is published. Nor should such a video feature the minister's personal logo, whether or not this is added on initial publication or when it is shared. The addition of a logo goes beyond sharing official content: it implies appropriation of that content for personal ends. It is difficult to escape the conclusion that the production of videos in this manner is a thinly-disguised means for a minister to promote himself and to raise his political profile at public expense.

56. My general observation on the basis of this random sampling of social media use by ministers is that while examples of good practice exist, bad practices and misuse of resources are widespread. Clearly, my conclusion in



the case to which I referred earlier,⁹ that the line between public and private spheres in the use of social media is blurred, can be applied more generally. Social media use by ministers and parliamentary secretaries represents an area of serious concern on ethical grounds.

Proposed guidelines on the use of social media by ministers and parliamentary secretaries

57. As noted earlier, an official policy on the use of social media exists in the form of OPM Circular 21/2015 and its subsidiary documents. This policy deals with the use of social media by government employees as individuals, and with the management of official social media channels. It does not address the specific issues arising from the use of social media by ministers and parliamentary secretaries. In the absence of clear and specific guidelines on this subject, I am recommending the adoption of the guidelines that are set out hereunder.

58. These guidelines aim to establish a clear distinction between:

- official social media use for government communication purposes; and
- personal use of social media by ministers and parliamentary secretaries, in so far as use of official public funds and resources and official content are concerned.

59. These guidelines do not deal exhaustively with all issues arising from the use of social media, and neither do they cover the use of specific social media tools. If it so chooses, the government may therefore incorporate them in a broader set of instructions on the use of social media.

The use of social media for official government communications

60. Official use implies that social media is used for the express purpose of communications on behalf of a ministry, department or other government entity, or of the government as a whole. Communications may be made by the entity or government in its own right or in connection with a specific official policy, programme or activity. The protocols that apply when one is acting as an official representative of the government or a government entity should be

⁹ Case K/008 (see footnote 2 above).



the same whether one is interacting with the press, speaking at a conference, or using social media.

61. Official social media channels should have the following characteristics:
- they are financed through public funds;
 - they are administered and maintained by public employees using public resources and equipment, or by third parties who have been contracted by the entity and are acting under its direction;
 - the content of such channels is non-partisan;
 - it is clear from the content that each channel is an official one, with the use of official symbols and other identifying material as appropriate;
 - such channels aim to inform, educate, reach out to, consult, engage with or seek feedback from the public in a transparent and accountable manner.
62. Official social media channels should not include:
- personal logos;
 - political content or partisan statements;
 - references to unofficial activities by individuals holding state office;
 - expressions of personal views by individuals holding state office.

The use of personal social media channels by ministers and parliamentary secretaries

63. Personal social media use means the use of social media for purposes other than official governmental purposes. Such purposes may relate to the user's private life or professional and political activities, including the expression of their political views. Personal social media channels remain the responsibility of the individual regardless of their profession, job or position in government.

64. Ministers and parliamentary secretaries have the same rights to free expression as any other person. As such, ministers and parliamentary secretaries can use their social media channels to publish content relating to their personal, social and professional lives as well as party-political content. They can also link to or share content from official social media channels. This



is subject to any obligations arising from their official roles that carry over to their personal behaviour, and subject to the need to maintain a clear distinction between their private social media channels and official social media channels.

65. Personal social media channels should adhere to the following rules:
- under no circumstance should such channels benefit from public funds and resources, whether directly or indirectly, even in relation to content that deals with the official activities of a minister or parliamentary secretary, except through the sharing of official content as indicated below;
 - such channels should not give the impression that they are official in nature;
 - accordingly, government or other official symbols and identifiers cannot be used, except through the sharing of official content as indicated below;
 - official audio-visual material that has already been published can be shared, as long as it is clear that such content is being shared from an official source;
 - official audio-visual material that has been generated for official purposes but not published can be used, as long as the source is acknowledged.
66. These guidelines are summarised in graphical form in document J.

Conclusion

67. In my opinion, a number of ministers and parliamentary secretaries have, to date, failed to properly distinguish between the official and personal spheres in the use of their personal social media channels. It is common practice for ministers and parliamentary secretaries to publish content that appears to have been created specifically for their personal social media channels using official resources. In this way they are using public resources to raise their own personal and political profiles. This represents misuse of public resources and a blurring of their roles as members of the executive and as politicians. This practice should be discontinued.



68. This conclusion is supported by an examination of posts in the personal Facebook pages of four out of five ministers – Dr Ian Borg, Dr Aaron Farrugia, Mr Silvio Schembri and Prof Edward Scicluna. The fifth minister, Dr Owen Bonnici, is the only one in this group who was found to have acted correctly.

69. However, this case report does not represent a finding of misconduct on the part of either one of them and as mentioned earlier, the ministers who feature in this report were chosen at random simply for the purpose of an investigation of general practice in the use of social media by ministers and parliamentary secretaries. There may well be other, possibly worse offenders, since the practice is wide-spread and of long standing. Given this as well as the fact that there was no formal process instituted against the ministers mentioned in the report and given that the complaint under investigation did not name any specific individuals, I feel it would be inappropriate to frame this report as a finding of misconduct on the part of either or all of the four ministers.

70. This being the case, a question that might arise is whether the names of the ministers ought to have been withheld from this case report so as not to single any one out. However, this would also require withholding the evidence on which my conclusions are based, since that evidence inevitably identifies the ministers in question. Transparency dictates that I should present the evidence on which I have based my conclusions.

71. It is my opinion that ministers and parliamentary secretaries should hereafter adhere to the guidelines set out in the preceding section of this case report. As noted in paragraph 21 of this report, I have forwarded the guidelines in question to Minister Edward Zammit Lewis, who has informed me that the government has agreed that ministers and parliamentary secretaries should henceforth be bound by the guidelines in question.

72. I consider this to constitute a highly positive development which suggests that the practices described by this case report will soon be a thing of the past. It is satisfying to note that, with the active cooperation of the government, the fundamental objective of my office, that is improving standards in public life, is being realised in connection with the matters addressed by this report.

73. I am accordingly closing this case. I will bear the guidelines in mind in any future cases involving the use of personal social media accounts.



74. A copy of this report is being given to the Complainant and to the Standing Committee for Standards in Public Life through its Chairman. Copies are also being given to the Principal Permanent Secretary with a view to dissemination to ministers and parliamentary secretaries, and to the Auditor General for any independent action he may wish to take. A copy will also be available on the official website of my office and circulated to the media.



Dr George Marius Hyzler
Commissioner for Standards in Public Life



Attached Documents

- Document A Email dated 14th August 2019 from Mr Christian Peregini.
- Document B Letter dated 4 March 2020 to Minister Owen Bonnici.
- Document C Letter dated 4 March 2020 to Minister Ian Borg.
- Document D Letter dated 4 March 2020 to Minister Aaron Farrugia.
- Document E Letter dated 4 March 2020 to Minister Silvio Schembri.
- Document F Letter dated 4 March 2020 to Minister Edward Scicluna.
- Document G Email dated 4 March 2020 from Minister Owen Bonnici in
reply to Document B.
- Document H Email dated 24 March 2020 from Minister Edward Scicluna.
- Document I Email dated 25 March 2020 from Minister Aaron Farrugia.
- Document J Summary of proposed guidelines on the use of social media.

Charles Polidano - Office of the Commissioner for Standards in Public Life

From: Christian Peregin <chris@lovinmalta.com>
Sent: Wednesday, 14 August 2019 10:04
To: Office
Subject: Request to investigate: How Ministers spend taxpayer money on Facebook and other government advertising concerns

Dear Dr Hyzler,

Over the past years, Lovin Malta has investigated and written various stories about the way the government spends taxpayer money on its own advertising. We discovered several issues that we believe need to be investigated by you to ensure there are proper guidelines to improve standards. Here is a quick summary:

1. Practically ever Ministry and Parliamentary Secretariat (e.g. Office of the Prime Minister, Ministry of Tourism, Ministry of Equality, Ministry of Transport, Ministry of Health etc) no longer has its own official social media pages. Instead, these entities promote their work through the personal pages of the ministers or parliamentary secretaries. This means that when taxpayer money is used to buy Facebook advertising on behalf of a ministry, the page running the campaign and getting the added promotion is the personal page of the politician rather than the ministry itself.

This is causing blurred lines between the political and the personal. How are we to know when taxpayer money is being used to promote a personal/political issue rather than one that is truly in the public interest to be taxpayer-funded? It also leaves taxpayers in a situation where, when a minister is replaced, the ministry must start building a new audience from scratch instead of inheriting the foundations of the previous minister. Instead, all the likes and followers collected through taxpayer money can be enjoyed by the minister on a personal & political basis. Prime Minister Joseph Muscat had promised to create guidelines for ministers following our story back in April 2018, but the situation has since remained the same and the guidelines never materialised. It is to be noted that the Education Ministry has its own Facebook page and it can be used as an example of best practice.

2. During our investigations it also became clear that there are no 'best practice' guidelines in terms of how advertising budgets should be allocated by public entities. If the government decides to spend all of its advertising money on One News or on Facebook, it is free to do so. In fact, as has happened in previous administrations, taxpayer money can still be used as a carrot and a stick to reward friendly media and punish media that is being critical towards government.

There is no way of truly proving this, but the absence of guidelines or transparent decision-making formulas means that it can be done with impunity. One of the tactics being used by this government is to spend a disproportionate amount of advertising money on social media, which undercuts the resources of the local national media. This could simply be the result of the cost/benefit of social media. In fact, it should be at the discretion of the government how much to spend on social media. However, there is an argument to be made that especially in the light of the aforementioned problem, such social media advertising needs to be better regulated to ensure taxpayer money is really being used in the interests of taxpayers and not in the personal interests of individual politicians. In fact, there seems to be no way of knowing whether ministers are using public funds to promote their re-election campaigns instead of their ministerial work.

3. Another aspect that recently emerged from our reporting is that some government entities are using news organisations as third parties to buy and produce their advertising campaigns. This means that these organisations are taking a commission off every advert bought on behalf of government. It is not clear whether there was a tender issued for this sort of work to be contracted. It is also not clear how much the

commission is and whether it is also taking a commission to buy adverts on its own media. What is clear is that there is little to no transparency around this situation.

We believe government advertising should be regulated and transparent. Ideally there should be a website through which every advert paid for by taxpayer money is logged for everyone to see in a transparent way the price at which it was bought, the entities who were paid and the purpose of such advertising. This would make it easier to hold public entities to account and it would serve as self-regulation. We also believe media buying on behalf of government should be a regulated space and should as much as possible not allow for problematic conflicts. Just as it does not make sense to award a big tender to a family member of a minister, one could argue that a news organisation should not get into such a cosy commercial relationship with the government they are meant to be holding to account.

4. Another point worth investigating is that because there is very little advertising regulation in Malta, paid-for sponsored content does not need to be legally declared as such, as it is in other parts of the world. This means that if the government, or a politician, pays to get an opinion piece, a survey, or a news story published, the taxpayer has no way of knowing about that transaction. It can be presented as an organic piece of content instead of a paid-for piece of content. It would be interesting to ask the various ministers whether they ever paid for certain content to be published without featuring a disclaimer that this is paid-for content.

Proper regulation of sponsored content is required both for the private sector and the public sector. However, since politicians are the people who can create such regulation, their abuse of the non-regulated sector is doubly problematic. They should be acting as transparently as possible to show leadership to the private sector but instead they are taking advantage of the regulation they refuse to create.

All of this should be read within the context of what is happening internationally. The rise of social media gives politicians the ability to communicate directly with the electorate (without needing the news media to act as gatekeeper). This has created a much more strained relationship between politicians and journalists around the world. Meanwhile, newsrooms are under more financial pressure than ever, forcing them to get into business models that might not make sense. It is up to us as society to find ways of empowering local media to be pillars of our democracy and watchdogs of authority rather than allow a situation where advertising from the biggest client in the country (the government) can easily be removed from them if they are critical of the administration in charge. It is in our interests to ensure transparency, accountability and fairness because otherwise we will end up in a situation where all news organisation can easily be bought by the government of the day.

Here are some articles we have written about all the above topics, for your reference:

[Facebook Is Helping Governments Drown Out The Media's Voice And Malta Is A Shocking Case Study](#)

[Prime Minister Pledges Transparency In Maltese Government's Social Media Ads](#)

[It's Official: Your Taxes Are Paying For Konrad Mizzi To Promote Posts On His Facebook Page](#)

[Cabinet Member Confirms Using Maltese Public Funds To Promote Posts On His Personal Facebook Page](#)

[EXCLUSIVE: MediaToday Acting As Government's Advertising Agency For Central Link Project](#)

[Why MaltaToday's Actions Are Only Part Of A Much Bigger Problem](#)

I would appreciate it if you could confirm receipt of this email and if you could keep us updated on your investigation.

I am available to meet at any time.

Thanks,

Chris

--

Christian Peregín
Founder & CEO

Lovin Malta

T: +356 79241187

E: chris@lovinmalta.com



Commissioner for Standards in Public Life

4 March 2020

Hon Dr Owen Bonnici
Minister for Education and Employment

By email to owen.bonnici@gov.mt

Dear Minister,

Case K/010: Use of publicly-funded material in personal social media accounts

I am currently investigating the attached complaint, in so far as it concerns the use of public resources to administer or generate content for the personal social media accounts of ministers and parliamentary secretaries.

You are not the subject of my investigation, which is focussed on general practice rather than any specific individual. However, my report on this case will include examples of social media use, and a random sampling undertaken for this purpose has thrown up the following:

<https://www.facebook.com/BonniciOwen/videos/vb.105547692810949/582456592353551/?type=2&theater>

You are kindly requested to state:

- (1) whether the content in question, consisting of a video on the development of a dementia centre in Safi, was produced using public funds or by individuals who receive a government salary;
- (2) what criteria you use to determine whether public resources can be used in the development of content for your personal Facebook account;
- (3) whether the content in question was published through any official channel (such as the website of the Department of Information or your ministry, or the official social media page of a government organisation) before being uploaded to your personal Facebook account. If so, please give details.



I would appreciate a reply by not later than **Tuesday 10 March 2020**.

Yours sincerely,

Dr George Marius Hyzler
Commissioner for Standards in Public Life



4 March 2020

Hon Dr Ian Borg
Minister for Transport, Infrastructure and
Capital Projects

By email to ian.borg@gov.mt

Dear Minister,

**Case K/010: Use of publicly-funded material
in personal social media accounts**

I am currently investigating the attached complaint, in so far as it concerns the use of public resources to administer or generate content for the personal social media accounts of ministers and parliamentary secretaries.

You are not the subject of my investigation, which is focussed on general practice rather than any specific individual. However, my report on this case will include examples of social media use, and a random sampling undertaken for this purpose has thrown up the following:

<https://www.facebook.com/ianborgpage/videos/vb.151496594943131/176633990268033/?type=2&theater>

<https://www.facebook.com/ianborgpage/videos/478875069662405/>

You are kindly requested to state:

- (1) whether the content in question, consisting of videos on the building of apartments and works in Dingli, was produced using public funds or by individuals who receive a government salary;
- (2) what criteria you use to determine whether public resources can be used in the development of content for your personal Facebook account;
- (3) whether the content was published through any official channel (such as the website of the Department of Information or your ministry, or the



official social media page of a government organisation) before being uploaded to your personal Facebook account. If so, please give details.

I would appreciate a reply by not later than **Tuesday 10 March 2020**.

Yours sincerely,

Dr George Marius Hyzler
Commissioner for Standards in Public Life



4 March 2020

Hon Dr Aaron Farrugia
Minister for the Environment, Climate
Change and Planning

By email to aaron.farrugia@gov.mt

Dear Minister,

**Case K/010: Use of publicly-funded material
in personal social media accounts**

I am currently investigating the attached complaint, in so far as it concerns the use of public resources to administer or generate content for the personal social media accounts of ministers and parliamentary secretaries.

You are not the subject of my investigation, which is focussed on general practice rather than any specific individual. However, my report on this case will include examples of social media use, and a random sampling undertaken for this purpose has thrown up the following:

<https://www.facebook.com/farrugiaaaron/photos/a.90729168962/10156979385393963/>

You are kindly requested to state:

- (1) whether the content in question, consisting of a graphic about expenditure on environmental protection by EU member states, was produced using public funds or by individuals who receive a government salary;
- (2) what criteria you use to determine whether public resources can be used in the development of content for your personal Facebook account;
- (3) whether the content in question was published through any official channel (such as the website of the Department of Information or your ministry, or the official social media page of a government organisation)



before being uploaded to your personal Facebook account. If so, please give details.

I would appreciate a reply by not later than **Tuesday 10 March 2020**.

Yours sincerely,

Dr George Marius Hyzler
Commissioner for Standards in Public Life



4 March 2020

Hon Silvio Schembri
Minister for the Economy, Investment
and Small Business

By email to silvio.schembri@gov.mt

Dear Minister,

**Case K/010: Use of publicly-funded material
in personal social media accounts**

I am currently investigating the attached complaint, in so far as it concerns the use of public resources to administer or generate content for the personal social media accounts of ministers and parliamentary secretaries.

You are not the subject of my investigation, which is focussed on general practice rather than any specific individual. However, my report on this case will include examples of social media use, and a random sampling undertaken for this purpose has thrown up the following:

<https://www.facebook.com/SilvioSchembriPage/videos/vb.803055243122680/230831154753131/>

<https://www.facebook.com/SilvioSchembriPage/photos/a.804011126360425/2793301220764729/>

You are kindly requested to state:

- (1) whether the content in question, consisting of a video of an official event and a graphic about economic performance, was produced using public funds or by individuals who receive a government salary;
- (2) what criteria you use to determine whether public resources can be used in the development of content for your personal Facebook account;



- (3) whether the content in question was published through any official channel (such as the website of the Department of Information or your ministry, or the official social media page of a government organisation) before being uploaded to your personal Facebook account. If so, please give details;
- (4) whether permission from Moody's was obtained for the use of their logo in the graphic.

I would appreciate a reply by not later than **Tuesday 10 March 2020**.

Yours sincerely,

Dr George Marius Hyzler
Commissioner for Standards in Public Life



4 March 2020

Hon Prof Edward Scicluna
Minister for Finance and Financial
Services

By email to edward.scicluna@gov.mt

Dear Minister,

**Case K/010: Use of publicly-funded material
in personal social media accounts**

I am currently investigating the attached complaint, in so far as it concerns the use of public resources to administer or generate content for the personal social media accounts of ministers and parliamentary secretaries.

You are not the subject of my investigation, which is focussed on general practice rather than any specific individual. However, my report on this case will include examples of social media use, and a random sampling undertaken for this purpose has thrown up the content reproduced hereunder:

<https://www.facebook.com/edwardsciclunadotcom/videos/vb.113158811451/620861981796376/?type=2&theater>

This video, which is one in an extensive series entitled “Fil-Fehma Tiegħi”, appears on your personal Youtube channel and your ministry’s official website in addition to your personal Facebook account.

You are kindly requested to state:

- (1) whether the videos in question are filmed in your office; and
- (2) whether these videos are produced using public funds or by individuals who receive a government salary;
- (3) what criteria you use to determine whether public resources can be used in the development of content for your personal Facebook account;



- (4) whether these videos are uploaded to your personal Facebook account before or after they appear in your ministry's official website.

I would appreciate a reply by not later than **Tuesday 10 March 2020**.

Yours sincerely,

Dr George Marius Hyzler
Commissioner for Standards in Public Life

Charles Polidano - Office of the Commissioner for Standards in Public Life

From: Bonnici Owen at MEDE <owen.bonnici@gov.mt>
Sent: Wednesday, 4 March 2020 21:37
To: Charles Polidano - Office of the Commissioner for Standards in Public Life
Subject: Re: [EXTERNAL] - Case K/010: Use of publicly-funded material in personal social media accounts

Dear Mr Polidano,

I thank you for your email and the letter dated 4th March, 2020 signed by Commissioner Dr George M Hyzler.

This is my reply:

1. Under our Constitutional arrangement, Members of Parliament who are appointed to form part of the Cabinet of Ministers hold a dual role: that of a Member of Parliament representing the interests of the constituency and that of a Government Minister or Parliamentary Secretary;
2. Contrary to the situation obtaining in jurisdictions such as the Netherlands, MPs who are appointed to Cabinet do not relinquish the role of a Member of Parliament but perform the dual functions simultaneously;
3. I have been elected to Parliament for three consecutive terms since 2008 (including the present legislature) and, on top of that, I have been serving the country as Parliamentary Secretary and then a Minister for two consecutive terms since 2013 (including the present legislature);
4. I strictly distinguish between the work I perform as a Member of Parliament and the work I perform as a Government Minister. With respect to issues relating to communications, I have a particular logo and brand for the work I perform as a Member of Parliament (as evidenced by www.owenbonnici.com) and a distinctive logo and brand for the work I perform as a Government Minister (as evidenced by www.education.gov.mt);
5. Any material on social media relating to my role as Member of Parliament is not financed by public funds, while any material relating to my role as Government Minister is financed by public funds;
6. With regards to social media videos relating to my portfolio as Minister for Education and Employment, these are financed by public funds and are uploaded on social media sites carrying the branded name "Edukazzjoni" (and previous to that "Arti u Kultura" or "Gustizzja"). I subsequently share them on my personal facebook pages in order to reach wider audiences.
7. Any social media videos relating to my function as Member of Parliament representing a particular district, are not financed by public funds. They are not uploaded on the social media sites carrying the branded name "Edukazzjoni". They of course do not carry the Government branding but, instead, are particularly plain and very simple. They are uploaded on my facebook sites.
8. With regards to the particular facebook clip relating to the dementia centre in Safi, it related to my attendance to an event where the Parliamentary Secretary responsible for the Elderly presided over a ceremony where the Government and the Church signed a document which will serve as a basis for the development of a dementia centre in the old MUSEUM building in the middle of Safi. I was invited there along with the rest of the Labour MPs elected from the fifth district. I do not know whether rest of the MPs elected from the fifth district were invited as well since I merely received an invite by the Parliamentary Secretariat's office who was kind enough to invite me for the event.
9. It is evident and obvious that I was invited there in my capacity as an MP elected from the fifth district, as were the other colleagues elected from the fifth district on the Labour ticket who were present for the occasion.
10. Since this dementia centre is very important to my constituents of the fifth district, I decided to see that a simple, short video covering the ceremony is produced and uploaded on my facebook pages. This was not paid from public funds.
11. The answer to the questions contained in your letter as follows:
 1. The answer is no.

2. I never produce any content for my personal Facebook account via public resources, all resources produced via public funds are directly related to my portfolio and are published on ministry social media. Once the content is published, then I share / retweet on my public accounts.
3. No it was not because the content of the video in question was not related to my ministerial portfolio and I was invited there in my capacity as district MP.

Whilst I hope that the above is to your satisfaction, please do not refrain to contact me should you require any further information.

Regards,

Owen Bonnici

From: Charles Polidano - Office of the Commissioner for Standards in Public Life

<charles.polidano@standardscommissioner.com>

Date: Wednesday, 4 March 2020 at 4:29 PM

To: Owen Bonnici <owen.bonnici@gov.mt>

Subject: [EXTERNAL] - Case K/010: Use of publicly-funded material in personal social media accounts

Hon Dr Owen Bonnici

Minister for Education and Employment

Please find attached a letter from the Commissioner for Standards in Public Life. A reply is being requested by Tuesday 10 March 2020.

The hyperlink in the letter is being reproduced here for ease of reference, since the letter is a scan:

<https://www.facebook.com/BonniciOwen/videos/vb.105547692810949/582456592353551/?type=2&theater>

Charles Polidano

Director General



Office of the Commissioner for Standards in Public Life

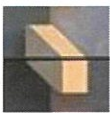
11 St Paul Street, Valletta VLT 1210, Malta

+356 27 269 593 www.standardscommissioner.com

Charles Polidano - Office of the Commissioner for Standards in Public Life

From: George Hyzler - Office of the Commissioner for Standards in Public Life
Sent: Tuesday, 24 March 2020 13:19
To: Scicluna Edward at MFIN
Cc: Charles Polidano - Office of the Commissioner for Standards in Public Life
Subject: RE: [EXTERNAL] - FW: Social Media Investigation

Ministru,
Nirringrazzjak u napprezza.
Tislijiet,



Dr George Marius Hyzler
Commissioner for Standards in Public Life

11 St Paul Street, Valletta VLT 1210, Malta
+356 27 269 593 www.standardscommissioner.com

From: Scicluna Edward at MFIN <edward.scicluna@gov.mt>
Sent: Tuesday, March 24, 2020 12:51 PM
To: George Hyzler - Office of the Commissioner for Standards in Public Life
<commissioner@standardscommissioner.com>
Subject: RE: [EXTERNAL] - FW: Social Media Investigation

Niskuza ruhi
Ser nara x'gara
Xorta hawn that issib l-istatment tieghi dwar is-suggett.

“My social media is mostly based on Facebook, Twitter, LinkedIn, Skype and my personal website. All costs including boosts and advertising have always been paid from my personal budget. The weekly 5 to 10 min video blog to inform the public of my work and explain related concept and principles started from the first week I was elected to the European Parliament in June 2009 and all expenses have during that time been covered by the European Parliament which provides a budget for this purpose.

Once elected and appointed as Minister for Finance in March 2013 I continued the practice of explaining and informing about topics related to my work as Minister and member of parliament through this weekly video blog..

Once produced by my Ministry and uploaded on the Ministry's website it is available for others to download, copy and share to increase promulgation. This includes uploading on Youtube and Facebook.”

E

Edward Scicluna
Minister

Kindly consider your environmental responsibility before printing this e-mail

From: George Hyzler - Office of the Commissioner for Standards in Public Life
<commissioner@standardscommissioner.com>
Sent: Tuesday, 24 March 2020 11:27
To: Scicluna Edward at MFIN <edward.scicluna@gov.mt>
Subject: [EXTERNAL] - FW: Social Media Investigation

FYI

From: George Hyzler - Office of the Commissioner for Standards in Public Life
Sent: Tuesday, March 24, 2020 11:26 AM
To: Bedingfield Glenn at Parliament-MT <glenn.bedingfield@parlament.mt>
Cc: Charles Polidano - Office of the Commissioner for Standards in Public Life
<charles.polidano@standardscommissioner.com>
Subject: RE: Social Media Investigation

Onorevoli,

Ninnota li minkejja li l-individwi koncernati inghataw estensjoni ta' zmien kif mitlub minnek, dawn baqghu ma rrispondewx, dejjem sakemm ir-risposti ma intilfux ghal xi raguni jew ohra.

Nitolbok tissolecita risposti mill-iktar fis, billi fin-nuqqas ikolli nghaddi għall-konkluzjoni tar-rapport fuq dak li jirrizultali.

Inselli ghalik,



Dr George Marius Hyzler
Commissioner for Standards in Public Life

11 St Paul Street, Valletta VLT 1210, Malta
+356 27 269 593 www.standardscommissioner.com

From: Charles Polidano - Office of the Commissioner for Standards in Public Life
Sent: Tuesday, 10 March 2020 14:36
To: Polidano Charles at Standards <charles.polidano@parlament.mt>
Subject: RE: Social Media Investigation

L-Onor Glenn Bedingfield MP

Nirreferi għall-messagg tiegħek t'hawn taht.

Il-Kummissarju għall-Istandards laqa' t-talba tiegħek għal estensjoni u għaldaqstant qed jitlob risposti sa bħal-lum gimgha, jgħid li t-Tlieta 17 ta' Marzu 2020.

Charles Polidano
Direttur Ġenerali



Office of the Commissioner for Standards in Public Life

11 St Paul Street, Valletta VLT 1210, Malta
+356 27 269 593 www.standardscommissioner.com

From: Bedingfield Glenn at Parlament-MT
Sent: 10 March 2020 08:49
To: Hyzler George at Standards
Cc: Polidano Charles at Standards
Subject: Social Meida Investigation

Għażiż Dr Hyzler

Qed niktiblek għan-nom tal-Membri Parlamentari tal-Gvern li rċevew ittra minn għandek fuq investigazzjoni li qed tmexxi dwar l-użu tas-social media fejn inti tlabt minn għandhom xi informazzjoni u tajthom żmien sal-llum biex iwegħbuk.

Għan-nom tagħhom qed nitolbok, estensjoni taż-żmien tar-risposta, sakemm ikunu ikkumpilati r-risposti li inti teħtieg.

Nirringrazzjak bil-quddiem,

Glenn Bedingfield
Government Whip

t: +356 99453662 e: glenn.bedingfield@gov.mt | www.parlament.mt

Kindly consider your environmental responsibility before printing this e-mail

HOUSE OF REPRESENTATIVES
PARLIAMENT OF MALTA
FREEDOM SQUARE, VALLETTA, MALTA

Charles Polidano - Office of the Commissioner for Standards in Public Life

From: Farrugia Aaron at MECP <aaron.farrugia@gov.mt>
Sent: Wednesday, 25 March 2020 18:03
To: George Hyzler - Office of the Commissioner for Standards in Public Life
Cc: Charles Polidano - Office of the Commissioner for Standards in Public Life
Subject: RE: [EXTERNAL] - FW: Social Media Investigation

Kummissarju Ghall-Istandards

Grazzi tal-email tieghek. Ma bghatlekx risposta sal-llum il-gurnata mhux b`nuqqas ta rispettz izda biex nitlob kjarifici mill-Cabinet u l-Grupp Parlamentari.

Tislijiet

A

Aaron Farrugia
Minister for the Environment, Climate Change and Planning

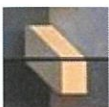
From: George Hyzler - Office of the Commissioner for Standards in Public Life <commissioner@standardscommissioner.com>
Sent: Tuesday, 24 March 2020 11:26
To: Farrugia Aaron at MECP <aaron.farrugia@gov.mt>
Cc: Charles Polidano - Office of the Commissioner for Standards in Public Life <charles.polidano@standardscommissioner.com>
Subject: [EXTERNAL] - FW: Social Media Investigation

FYI

From: George Hyzler - Office of the Commissioner for Standards in Public Life
Sent: Tuesday, March 24, 2020 11:26 AM
To: 'Bedingfield Glenn at Parliament-MT' <glenn.bedingfield@parliament.mt>
Cc: Charles Polidano - Office of the Commissioner for Standards in Public Life <charles.polidano@standardscommissioner.com>
Subject: RE: Social Media Investigation

Onorevoli,

Ninnota li minkejja li l-individwi koncernati inghataw estensjoni ta' zmien kif mitlub minnek, dawn baqghu ma rrispondewx, dejjem sakemm ir-risposti ma intilfux ghal xi raguni jew ohra. Nitolbok tissolecita risposti mill-iktar fis, billi fin-nuqqas ikolli nghaddi ghall-konkluzjoni tar-rapport fuq dak li jirrizultali. Inselli ghalik,



Dr George Marius Hyzler
Commissioner for Standards in Public Life

11 St Paul Street, Valletta VLT 1210, Malta

CAN A SOCIAL MEDIA CHANNEL:	OFFICIAL (MINISTRY) SOCIAL MEDIA CHANNEL	MINISTER'S PERSONAL SOCIAL MEDIA CHANNEL
Include content about the Minister's official activities?	✓	✓
Provide official information about the ministry's work?	✓	✓
Include content about the Minister's political activities?	✗	✓
Include an expression of the Minister's political views?	✗	✓
Include content about the Minister's family or personal life?	✗	✓
Include content that has been produced using public funds or resources?	✓	✗
Be administered and updated by public employees during their working hours?	✓	✗
Feature an official logo, except for shared or reposted official content?	✓	✗
Feature the Minister's personal logo?	✗	✓
Be administered and updated by privately funded third parties?	✗	✓
Be administered and updated by third parties contracted using public funds?	✓	✗
Share or repost official content that is already in the public domain?	✓	✓