

# COMMUNITY BROADCASTING SUSTAINABILITY REVIEW 2024

SUBMISSION FROM CHRISTIAN MEDIA & ARTS AUSTRALIA

## About CMAA

On behalf of its 36 Community Broadcast Licenced Radio Station Members, Christian Media and Arts Australia (CMAA) is pleased to make this submission relating to the Department's Sustainability Review of the Community Broadcasting Sector.

CMAA has represented the interests of Christian media organisations for over 40 years. In doing so, it amplifies the interests of over 3,000 Christians in media and the arts by undertaking advocacy, empowering content creation, fostering unity and promoting excellence.

CMAA Community Broadcast Licence (CBL) holders members reach culturally and geographically diverse audiences through:

- eight (8) Community Broadcast Licence (CBL) holders in state and territory capitals,
- twenty-eight (28) CBL holders in major regional and rural centres,

Additionally, CMAA has 53 other member organisations also contributing to the media landscape formation in Australia including:

- a nationally networked service, broadcast on more than 800 Open Narrowcast Licences (ONL) serving parts of capital cities; major regional centres and over 600 regional and remote towns and communities,
- subscription television services on all major platforms, including Foxtel and Video on Demand,
- streaming services (VOD), and
- associated digital media.

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# RESPONSES TO THE PRIORITY AREAS

## Priority Area 1: CBP Funding, structure, and outcomes

### Introduction

CMAA endorses the current appeal of the CBAA and the CBF for an urgent and substantial increase in government funding to address critical unmet need.

Unmet need can to some extent be judged by the *opportunity gap*: the gap between requests received by the CBF and the available investment. For a discussion about this gap, we commend the CBF and CBAA submissions.

However, the unmet need is not only seen in unsuccessful funding bids.

A central premise of Roadmap is that Community Broadcasting is a central pillar of the Australian democracy for its important role in gathering and presenting reliable, accountable news and information in localities and communities across Australia, for amplifying the voice of underserved, diverse communities and cultures, for fostering and amplifying unique cultural experiences and engagement, for supporting the spiritual and personal wellbeing of Australians, and for enhancing social cohesion.

The key message of Roadmap is that standing still is not an option. Doing the same thing with the same (or indeed a diminishing) level of resources will not allow the sector to withstand the combined impact of digital disruption, social and demographic change, the disruption from and need to respond to natural disasters, the desertification of news, the need for prominence in the face of rapid technological development, and pressure on both financial and non-financial support, especially the availability of volunteers.

Competition from new media, especially the global social media giants, impacts the ability to stay at the forefront of people's media consumption. As traditional (but emergent) media we need to grow capacity and prominence not just on traditional terrestrial radio but on streaming platforms and social media. This requires updated skill sets, new business models and new workflows, all of which requires investment. If grant funding is tied to too narrow a space or is difficult to access we will not make this transition to becoming robust media organisations, rather than radio stations alone.

No-one can credibly argue that community broadcasting is other than the enormously successful result of hard, clever work by generations of people committed to serving communities everywhere, backed by both public and private investment, always with a view to the future.

The opportunity cost of insufficient additional funding will undoubtedly be borne in our communities and cultures of the future. The potential price could be the loss of all that has been built over 50 successful years and the loss of the dividends our present owes the future.

The future deserves additional investment from all sources together with a smarter, more outcomes focussed investment of funds in the Community Broadcasting Programme.

## Grant Reliance

The challenges to the viability and sustainability of broadcasting are well understood and do not need to be restated here. Our community broadcasting sector is certainly not immune to the need to rapidly adapt, innovate and grow both in capacity and sustainability.

Yet as Roadmap 2033 suggests, and the department’s sustainability review confirms, after five decades the sector remains heavily dependent on grant funding.

There is uneven capacity to secure the investment needed for the challenges at hand. While 33% of the broader community sector revenue is from grants, and 67% of revenue for First Nations stations, there is huge unmet need<sup>1</sup>.

Two things need to happen.

- The overall quantum of funding needs to be increased towards the unmet need, and
- Funding distribution needs to be refocused to reflect an outcomes-based approach.

### Purpose driven: support for an outcomes approach

As Roadmap notes, *increasing pressure on financial sustainability* is both a threat and an opportunity for the whole sector<sup>2</sup>, and it requires a sector-wide response. Roadmap was crucial in starting that process.

Realising the present *opportunity* will require new and innovative approaches, the further development of fundraising and sponsorship skills, and new ways of thinking. Where a culture of over-reliance on government funds is entrenched, this will need to be addressed with sensitivity.

Changing to a more outcomes-based approach will undoubtedly help refocus the grants programme on sustainability and sector development.

*Purpose* is deeper than *mission and vision*. It is the outward expression of the values and beliefs that underpin an organisation, the unique value it creates for those it serves, (in this case our communities and audiences)<sup>1</sup>. A purpose driven approach asks “*what difference do we want to make and for whom?*” and answers it through the lens of a theory of change, while articulating the outcomes that should be evident from our work.

CMAA’s support for an outcomes-based approach is based on our own experience as a purpose-driven sector and as a foundation member of the Community Broadcasting Roundtable we were keen participants in the development of the Sector Compass<sup>3</sup>, which for the first time articulated a shared purpose for the sector as a whole.

Serving the Christian community interest, CMAA members derive their purpose from the Christian faith, so an ongoing project for CMAA is a discussion about a theology of Christian media, with rich conversations around the biblical themes of *truth*, *goodness* and *beauty*.

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<sup>1</sup> Community broadcasting sector sustainability review Discussion Paper, DITRDCA, June 2024 Page 8

<sup>2</sup> Roadmap, p 19

<sup>3</sup> <https://cbf.org.au/documents/2023/01/community-broadcasting-sector-compass.pdf> accessed 30/08/2024

CMAA regularly undertakes research to provide insights for members into the outcomes of their work. This not only helps them to keep strategically focussed on serving their community, it provides accountability and insights for donors.

With approximately 60% of member station income derived from fundraising reporting against outcome, making the case for support, has been a key factor in the growth of Christian media.

In 2021 CMAA commissioned a research report into *the Social Impact of Christian Radio in Australia*. Insights from this work prompted us to think about more effective ways to partner with other purpose-driven organisations in meeting community need both locally and globally.

### *SROI Research*

With experience gained from the Social Impact report CMAA secured philanthropic funding for Social Return on Investment (SROI) research, to commence this year, with the hope this would in turn, underpin the development of an outcomes reporting framework as envisaged by Roadmap.

A change in the CBF's approach to Sector Development funds in Round 1, 2022 created an opportunity to expand the scope of this project to other sector partners.

First Nations Media, Disability Media, and the National Ethnic and Multicultural Communities Council (multicultural broadcasting) are now working with CMAA on the research while the CBF and CBAA are providing data and insights.

The research is being undertaken by Think Insight with CMAA coordinating the project.

Our expectation is that by May 2025 we will see the reporting of outcomes against social value modelling and a validated SROI report for each of the 4 sectors, and for an aggregated grouping.

The outcomes will be validated against internationally recognised SROI methodology, a standard recognised by Treasury.

We are very excited about the prospect of this project to help in the development of an outcomes framework for community broadcasting.

We are also delighted to be working with other sector organisation peers. In the section below we will make a case for greater collaboration as a critical factor in achieving Roadmap priorities.

### **Priority: Alignment with the Roundtable**

Eleven years on, the Community Broadcasting Roundtable has established itself as an extremely valuable way to achieve commonality of understanding and purpose about the role of community broadcasting.

Without the Roundtable, it is unlikely Roadmap would have succeeded so comprehensively. Aligning funding with the Roadmap goals, with oversight by the Roundtable, is critical to future success.

The Roundtable has no role in directing members, however its successes to date have come from building relationships and achieving consensus.

Roadmap rightly focussed attention on the need to celebrate the diversity within the sector and *“tell a united story of our positive impact on the diverse communities and cultures we reflect*

and serve”<sup>4</sup> The Roundtable is the means to this. With its focus directed to the achievement of the ten year plan for the sector this will become even more apparent.

Recently, having the Minister and Department officials attend Roundtable meetings to discuss sector priorities and issues has been a significant step forward. It is our recommendation that this dialogue should continue as part of the discussions about funding priorities.

### *Recommendations*

**Recommendation 1. The Roundtable continue as a gathering of sector organisations, meeting as peers, to oversee rollout of the Roadmap.**

**Recommendation 2. That the Minister and Department continue their dialogue with the sector Roundtable by attending at least one meeting per year to discuss sector priorities and inform funding decisions.**

## Priority: Sector Development and Coordination Support

The role of sector organisations is critical to effecting the changes envisaged by the current review.

The role and workload of these organisations has steadily increased over the past decade—a fact that CMAA celebrates. It is very pleasing to have seen the enthusiasm of both the CBAA as the sector peak, and CBF as the grant-maker to work in collaboration with organisations representing the diverse community interests of community broadcasting.

However, support for the proper functioning of sector organisations, based on history and precedent, is out of step with current practice and the increased expectations of engagement.

This review is an opportunity to review and recalibrate sector body funding to make sure it aligns with Roadmap goals, including sustainability and outcomes-based reporting.

Our general proposition is that grant-making should lean heavily towards promoting sustainability and developing self-sufficiency while providing for the achievement of clear outcomes.

Without a clear sense of the outcomes, support funding could tend to support reliance rather than resilience. We do not think this is a reasonable proposition given the scarcity of funds and the challenges ahead.

### *CMAA’s situation*

For a long time, it has been something of an uncomfortable truth that CMAA receives no support funding from the CDP despite its extensive involvement in sector coordination and development and the contribution made by its members. Our appeals for equity have, for decades, not been successful and, to be fair, we have not wanted to see funds taken away from others.

CMAA is entirely funded by member fees, private philanthropic grants, and income derived from operations including conferences, concerts and the coordination of engagement between members and Christian charities.

Despite the lack of support funding, we are nevertheless continually engaged through activities including:

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<sup>4</sup>Roadmap 2033, p 13

- Participation in the Roundtable
- Participation in monthly Sector CEO Leader meetings, vital in discussing and directing key issues impacting the community sector
- CBAA committees, steering groups and the like including, but not limited to, task forces including Digital DAB+ , the News Project, the Codes Review, Technorama and the Community Training needs review
- Championing engagement in sector leadership with members recently serving on the CBAA board including the role of President, and the CMTO Board as Chair.

The increasing burden of these and other important functions is putting enormous pressure on our CMAA current team and our budget. Our sector coordination and development work is also largely undertaken by voluntary effort and, as Roadmap has noted, there is a limit to this valuable resource. This is more evident if the organisation cannot provide administrative support or research assistance to those volunteers.

We do not argue that support for others should be withdrawn. Quite the contrary. We are aware of their challenges in the same area and have the utmost respect in engaging with these peers, in turn achieving positive outcomes for the sector.

However, it is time that this historic inequity is recognised as inherently untenable and unfair. Considering current and increasing demands, this inequity needs to be addressed.

### *2024-2025 Sector Coordination Grant Round*

For this reason, we were delighted at the implementation by the CBF of the 2024-2025 Sector Coordination grant round, with eligibility only for sector organisations currently not in receipt of ongoing support funds, including CMAA.

As an *unsupported* sector representative organisation, this was the first time we were able to apply for scarce sector development funds without having to compete with stations (including our own members) and *supported* sector organisations. It represented a significant step forward.

Perhaps because of these competing priorities CMAA had previously been unsuccessful in grant proposals designed to benefit not only our own members but others in the sector. These included:

- An audio sharing platform (MediaPoint) rebuild, something that would have also benefitted other community sector groups;
- A next generation leadership program (a significant unmet need).

### *The CMAA SROI Project*

The initiation of the 2024/25 Sector Coordination pool provided the opportunity for CMAA to expand planned Social Return on Investment research, for which we had received funds from a private philanthropic foundation to a scale that makes it a piece of landmark Roadmap research.

The project is outlined above<sup>5</sup>.

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<sup>5</sup> p 5

The CBF grant afforded us the opportunity to assist the development of the whole sector, and this was a deliberate choice: CMAA did not apply for funds to support day-day involvement in sector activities, but for broader sector goals.

Projects like the SROI research are critical to achieving the changes necessary for Roadmap to be realised. They are ideally coordinated and administered by sector organisations as they are far too complex for individual stations or, we suggest, external partners alone, as they require a high level of sector knowledge.

### *Ongoing Support – Two Streams*

As it presently stands, the 2024/25 Sector Coordination pool will not continue. It was created as a one-time drawdown on CBF retained funds and is, of course, unsustainable in that form.

Even if, as we hope, new funds are made available for this pool to continue beyond 2025, it will still not address the inequities in support for sector bodies.

There is a need for *both*

- ongoing uncontested funding to support *all* sector (representative) organisations in their sector coordination role, and
- contested funds for projects that will develop the sector’s ability to build capacity to achieve Roadmap 2033 goals.

Both streams should be measured against the principles stated above, namely

- that grant-making should have a strong lean towards promoting sustainability and developing self-sufficiency,
- that ongoing support funding should be based on and reported against clearly defined outcomes.

### **RECOMMENDATION**

**Recommendation 3. That new funds be made available to provide uncontested sector coordination support for eligible sector organisations on an equitable basis, with clearly defined goals and measurable outcomes.**

**Recommendation 4. That new funds be provided for an ongoing, contested, round of Sector Development grants, available to eligible sector organisations on an equitable basis with clearly defined goals and measurable outcomes. (But see proviso in recommendation 5 below)**

**Recommendation 5. That unless uncontested sector support funds are made equitably available the Sector Development 2024-2025 pool continue as a permanent line, but only to those organisations currently eligible.**

### **Priority: News**

The decline in local and regional public interest journalism is a significant current issue and the reasons for it are well documented elsewhere. Independent, accurate, reliable and accountable news and information are essential to democracy.

Arguably, of all media, community broadcasting is best placed to be at the centre of a collaborative effort to rebuild news capacity at a local and regional level.



Given the need, it is not surprising to note the trend for a steady increase in funding requests to the CBF for news and current affairs content making.

However, the investment required to build sustainable news and current affairs capacity to provide coverage of all communities served by the sector goes beyond the normal annual allocations of funds under the CBP.

Establishing a news service is expensive. Maintaining it requires considerable effort, noting however that as a service demonstrates its worth support is somewhat easier to achieve.

In the Christian sector Sydney's Hope Media established a newsroom in May 2020. The establishment of the service, involving the initial employment of journalists, development and capital fit out costs, was paid for by donors to the station as a special addition to the bi-annual listener appeals.

The development of news capacity was in response to regular listener feedback that existing news services were not meeting the needs of the Christian community interest.

Sustaining the service through listener funding remains a priority, but with the recent economic downturn and other financial pressures plans to expand the service to Hope's Co-Mission partner 96five Brisbane are, regrettably, on hold.

Hope Media's news content is freely available to any community broadcaster through the Community Radio Network administered by the CBAA. Other stations also contribute content.

Sonshine FM in Perth operated a newsroom for many years before, regrettably, having to close it due to financial pressures.

Maintaining news and current affairs making capacity is difficult for stations working alone.

What about alternatives such as syndicated news content, or "rip and read" services?

We argue these are *not* a sufficient response to overcome news desertification and will run the risk of being analogous to the centralised approaches now widespread in other media.

CMAA argues that the present imperative is to rapidly develop local capacity for public interest journalism in as many community broadcasting services as possible. Utilising the CBAA's Community Radio Network platform capabilities, we have long imagined a daily offering of news generated in localities across Australia, telling stories of the broad and diverse communities of Australia in every market that chooses to take it.

Our submission proposes that the time is opportune to capitalise on the investment already provided for the CBAA project, plus the listener/supporter investment through stations such as Hope 1032, and significantly expand the news and current affairs infrastructure of Australian communities through the community broadcasting sector.

Our suggestion is that this be treated as a project of national significance and therefore outside the annual allocations, and that it be considered as an infrastructure-building project with 5 year objectives and funding to match, being front end-loaded to gain quick momentum.

## Recommendation 6. News

- a. **That a community broadcasting news building project be commenced outside of the regular funding stream.**
- b. **That the news project be considered a project of national significance and funded on a 5-year basis with a timeline developed to build news and current affairs making capacity in as many services as possible.**

## Priority: Supporting Collaboration

Roadmap concludes that to achieve sustainability, innovation, growth and other sector goals will require a collaborative approach. Collaboration is envisaged between stations, within our community sector and with other sectors including public broadcasting.

CMAA is enthusiastic about collaboration. We have seen the benefits among our own membership, and through projects like the SROI research, we are committed to a high level of collaboration with other sector organisations.

Earlier in this submission, we have outlined a case for a permanent, contested pool of funds to further collaboration within and between sectors. In addition, the news project priority outlined above would be a collaboration of national significance.

Experience in the Christian sector also speaks to another beneficial form of collaboration – station to station.

Within the CMAA membership several models have been developed.

- **Co-Mission**, a collaboration between four stations: Hope1032 Sydney, 96five Brisbane, Salt 106.5 Sunshine Coast and Juice 107.3 Gold Coast. (Although the Co-Mission sees itself as exactly that: stations sharing a common mission in different markets, in the words of the present discussion paper it might be thought of as a consortium).
- **The Christian Media Hub** is a collaboration between Christian stations in regional NSW.
- **Townsville – Gladstone**, stations that share resources and expertise in regional Queensland.

While each model is slightly different the common features are

- A common commitment to quality programming to serve the interest and needs of Christian audiences in the local area;
- Sharing of services and capabilities including financial, fundraising, sponsorship sales and in some cases human resource management;
- Some shared content suitable to supporting the common needs of people of the Christian faith.

These models all began because of a need to improve the viability of one of more services. Some were initiated because of a request for assistance from services with pressing short and medium-term financial needs.

While some larger, well-established stations have limited capacity to underwrite such efforts, *most of the cases cited above were enabled by substantial, short term philanthropic gifts.*

It may assist the current review to reflect briefly on our experience with philanthropic organisations. Private philanthropic foundations have been consistent supporters of Christian

media over its nearly five-decade history. It's fair to say that many of our members have been supported through financial crisis at some point in their history – this is a feature of the community broadcasting sector as a whole.

Just as governments want to see beneficial outcomes in the use of public funds, philanthropic foundations are very careful stewards of their resources. A few years ago, one such foundation raised with the sector a concern that despite a history supporting stations with short term financial need, those services did not seem able to do more than survive; in other words, they remained only marginally viable.

Some of the collaborations in our sector were the direct result of applying our collective minds to this challenge. For that foundation, and for the sector, it was a question of being good stewards of these (and other) resources.

Good stewardship is an article of the Christian faith. Indeed, one of Jesus' key teachings, the parable of the talents, challenges Christians specifically on this issue of maximising the outcomes from the use of capital resources<sup>6</sup>. The exemplar stewards are the one who used the funds trusted to them to produce outcomes. (This is why we are strong advocates of outcomes-based funding).

The solution to the stewardship dilemma was this: the foundation made funds available to enable collaboration and co-mission (or consortium) models. The financial support, *combined with the sharing of expertise and services*, made all the difference.

The community broadcasting sector's greatest asset is its people. Yet we have constrained them within a model which, especially in smaller markets, will never enable them to achieve their full potential. Starved of capital resources, relying on a diminishing pool of volunteers in all areas – *especially governance* – the majority of community broadcasters will continue to struggle from budget to budget. This is not a model that lends itself to innovation, growth, and energetic community engagement. It burns people out. It is not good stewardship of our best asset.

Our submission is that the sustainability, indeed viability, of most stations – especially those outside the specialist services in capital cities<sup>7</sup> -- requires improving the circumstances in which larger, established stations e.g. capital city services, can support stations in smaller markets financially, operationally, and with governance. We will speak more to some of these in *Part C: Legislative and Regulatory Issues*.

Our positive experience of maximising philanthropic grants using collaborative and co-mission arrangements suggests that this approach be considered for CBF funding.

One way to enable that would be to remove the income cap on development and operations and sector development grants to allow the establishment of station to station or multi-station collaboration.

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<sup>6</sup> Matthew chapter 25, verses 14-30

<sup>7</sup> Specialist services: those serving an identified community interest (such as religious – christian). It is interesting to note that these services are more likely to be able to identify the social value they produce for their community interest and make a compelling case for support from that community and its benefactors. Our own access to philanthropy and the support of Vision Australia for the radio reading networks are examples.

Another would be to encourage joint applications by mid-tier and smaller stations, for example on a regional basis, to develop joint capacity, whether through training or appointing shared administrative and technical staff.

In summary, specific funding for collaborative projects is an effective way of improving sector capacity and sustainability.

#### **Recommendation 7. Collaboration establishment and development grants**

- a. That a category of funding be made available to allow the establishment of collaborative and consortium models**
- b. That income caps on grants be eliminated for the purposes of a station assisting others through a collaboration or consortium approach.**

### **Other issues: Grant Making Practice**

In responding to the review's questions about grant administration we would not be serving our members well by failing to mention concerns many have with processes and practices of the CBF.

It is a matter of record that Christian stations are vastly underrepresented in grant allocations.

CMAA's community broadcasting members represent 9% of the community broadcasting sector by number. Their contribution to sector investment is significantly disproportionate.

The turnover of CMAA member stations represents 40% of the entire turnover of the community broadcasting sector. Government funds received by our members contribute approximately 1% of their turnover. Put another way, of all government funding distributed by the CBF in the past 10 years the average allocation to christian stations is less than 2%.

Regarding outcomes, of our 36 member stations 18 are represented in the community sector's audience survey data. These 18 stations (half of our membership) represent

- 34% of all listenership to community broadcasting nationally, and
- More than 37% of those who listen exclusively to community broadcasting.

The ongoing inequity of access to funding weighs heavily on the minds of our membership.

In addition, people from the christian sector are notably underrepresented within the CBF including its board, committee and assessor pools.

Some potential reasons for this are outlined below. In doing so we first want to acknowledge that in recent years the CMAA and CBF leadership have worked deliberately and productively on building a closer relationship.

There is a genuine goodwill and desire to identify and remedy the historic lack of CMAA representation within the CBF. We applaud recent efforts on the part of the CBF to address some long-standing issues arising from recent reviews, notably the one-off establishment of the 2024-2025 Sector Development pool.

CMAA continues to encourage its members to apply for positions on the CBF board, committees and assessor pools.

We also encourage the CBF to think about matters of ongoing concern to our members. These are outlined below.

## Peer Assessment

Members regularly report that assessors do not seem to understand their needs or type of service, especially if those assessors have a background in geographically based licences rather than specialist community interest licences.

Additionally, they report that assessors who come from stations with different forms of governance and financial management lack a frame of reference for properly assessing the application.

The size of a station's budget is a particular issue. An assessor from a small station with limited finances and more volunteers than paid staff may find it difficult to understand the balance sheet of a larger station, especially if it has a higher number of paid staff.

Prudent management of superannuation, long service and sick leave balances, contingency funds against disaster recovery or events such as the COVID-19 pandemic can look to the untrained eye as though a station is "richer" than it is.

If grants applications are judged against such a misunderstanding, they are more likely to fail. At present, grant assessors are not required to demonstrate experience in financial management.

The peer assessment process presents challenges due to the high levels of understanding sometimes required to properly assess applications, particularly if they involve financial or technical acuity or an understanding of particular cultural contexts.

We suggest a process where, when applications are triaged before being allocated to assessors, comments and analysis on financial and technical matters should be provided by qualified CBF staff.

## CBF representation

In addition to the low representation of Christian stations among successful grantees, we believe the historic lack of success of CMAA members when nominating for CBF board, committee and to assessor pool positions must be remedied. Members tell us that they no longer nominate because of previous lack of success, an unsatisfactory situation that must be remedied.

We continue to encourage members to nominate. In turn we urge the CBF to find ways to improve the inclusion of people from the Christian sector and ensure staff and volunteers are culturally aware of the needs of stations representing the Christian community interest.

## Application questions not related to grant criteria

Members regularly express concern about the inclusion of an application question about diversity, inclusion and accessibility, where these are not assessment criteria.

With the CBF and others in the sector, CMAA is committed to the continuing efforts to improve inclusion, diversity and accessibility. The issue is however how these are advanced by the inclusion of questions about them in a grant application process.

Members regularly report a perception that their answer to these questions has a bearing on the outcome of their application. In fact, members have reported to CMAA that when seeking feedback about an unsuccessful application they have been told, for example, that they should improve the gender balance of their board.

If the reason is to collect sector data and track improvements in diversity, inclusion and accessibility, we believe this function is now more than adequately performed by the CBAA. The CBAA data allows the whole sector to assess and make decisions about ways to achieve better outcomes.

If for no other reason than it would give more confidence of a level playing field we urge that no question should be asked at application stage other than that which is directly relevant to the criteria for that grant. It would also mitigate against concerns of unintended bias in the assessment process.

#### **Recommendation 8. Peer assessment**

- a. That the peer assessment model should be improved with the provision of advice from CBF staff with expertise in financial and technical management, and reviewed with a view to understanding whether any lack of cultural awareness is leading to reduced success for Christian stations, and**
- b. training be provided so assessors can be more culturally aware of the objectives and needs of stations serving community interests other than those of their own station.**

#### **Recommendation 9. Relevance of application questions**

- a. The collection of social and other data should be removed from grant applications unless it is directly related to the grant criteria.**

#### **Recommendation 10. Christian sector participation**

- a. That the CBF explore reasons for the low success rate of nominees for CBF board, committee and assessor positions and**
- b. identify steps to address any lack of understanding of the needs of stations serving the Christian community interest including at governance level.**

## Priority 2: Legislative and regulatory issues

It is tempting to characterise the legislative and regulatory framework for community broadcasting as being frozen in a moment of time.

This is not to deny changes such as recent reforms to the B66 (licence renewal) form, the 2022 amendment to the BSA to allow the ACMA to consider renewals on an ongoing service basis and changes to temporary community licences (TCBLs). These were welcome as streamlining measures.

What hasn't changed is the way the community sector is 'seen' from a regulatory point of view; the underlying assumptions of what a community broadcasting service should look like, how it is governed and operated, and what the regulator measures to assess ongoing compliance.

What the Broadcasting Services Act 1992 (Cth) (BSA) and accompanying Explanatory Memorandum (EM) made formative, is made normative through regulation. To that end, the core statutory framework for community broadcasting services remains; for all practical intents and purposes, unchanged since the promulgation of the BSA in 1992.

On matters of critical importance to shaping community broadcasting, the current Community Broadcasting Guidelines still draw heavily on the Explanatory Memorandum tabled with the original introduction of the 1992 Broadcasting Services Bill. The guidelines in focus for this submission are:

- Community Broadcasting Not for Profit Guidelines (2011)<sup>8</sup>
- Community Broadcasting Participation Guidelines (2010)<sup>9</sup>
- Community Broadcasting Sponsorship Guidelines (2008)<sup>10</sup>

Why does this matter, and why does it matter now?

The Broadcasting Services Act of 1992 was an attempt to comprehensively pave the way for the future of broadcasting services. The Minister's Second Reading Speech began this way:

*This Bill is the culmination of a long effort to bring the 50 year old Broadcasting Act of 1942 up to date. It gives effect to the Government's 1987 election commitment, reiterated in 1990, to establish an appropriate regulatory framework for the broadcasting industry that will serve Australia into the 21st century<sup>11</sup>.*

What was designed to deliver the sector *into* the 21<sup>st</sup> century is no longer the vehicle that will drive it forward to meet community needs and expectations for the bulk of this century.

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<sup>8</sup> <https://www.acma.gov.au/sites/default/files/2019-12/Community%20Broadcasting%20Participation%20Guidelines%20-%20Print%20enabled.pdf>

<sup>9</sup> <https://www.acma.gov.au/sites/default/files/2019-12/Community%20Broadcasting%20Participation%20Guidelines%20-%20Print%20enabled.pdf>

<sup>10</sup> <https://www.acma.gov.au/sites/default/files/2019-06/Community-Broadcasting-Sponsorship-Guidelines-2008.pdf>

<sup>11</sup> 36<sup>th</sup> Parliament, Senate Hansard, June 4 1992, (Senator Collins)

<https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22chamber/hansards/1992-06-04/0142%22;src1=sm1>

In 1992 community broadcasting (nee. public broadcasting) was less than 20 years old. The growth shoots were evident. They have produced the comprehensive and celebrated ecosystem of social and cultural diversity represented by the sector today. Yet there are challenges.

The Department's present consultation about the sustainability of the sector, together with the sector's own Roadmap 2033 initiative presents, *by definition*, a timely opportunity, three decades on, to evaluate and reconsider the principles and assumptions engraved in the BSA.

In 1992 the BSA modernised 50 year old media law during a time of significant social and technological change. The pace of that change continues to increase exponentially to the point where public policy finds it hard to keep pace.

Current concerns about issues as diverse as the impact of artificial intelligence, the rise of misinformation and disinformation, harms done to young people through social media, the decline of investment in public interest journalism among other issues demonstrate that the present moment needs to be grasped as this generation's mandate to ensure the regulatory regime for community broadcasting is fit for present need and into the future.

Given the challenges articulated so well in both the Roadmap and the sustainability review it is not just the *right* time, it is *just in time*.

## Our experience

The perspectives in this submission are drawn from the extensive experience of our members, who rank among the pioneers of community broadcasting, and who today serve a significant audience who rely on it.

The first specialist licence for a *Religious-Christian* station was to 2CBA (now Hope 1032 Sydney) in 1978. In 2024, 36 community stations serve the Christian community interest.

Eighteen of those participate in the sector's McNair Yellow Squares listener survey (50% of our membership), and that data indicates substantial engagement and support for Christian broadcasting. Data from the 2024 survey of those 18 FM stations and two separately surveyed DAB+ services shows:

- Weekly audience of 1.6m (9% of all persons over 15+)
- Monthly audience of 2.938m (17% of all persons over 15+, up 1% on 2023)
- Ever listened: 5.686m (32% of all persons over 15+, up 1% on 2023)
- Exclusive listeners: 138,000 (1% of all persons over 15)
- Time spent listening: 9.5hrs per week

## Concerns about the current arrangements

### Not for profit

CMAA thoroughly endorses the policy position that community broadcasting licenses should only be operated by not for profit organisations.

Unfortunately the BSA has been completely quarantined from the comprehensive reform of not for profit regulation commencing with a 2010 Productivity Commission report, leading to the establishment of the Australian Charities and Not-for-profits Commission (ACNC) in 2012, the subsequent harmonisation of state-based regulation of NFP incorporated associations, and the



most recent reforms of the *Income Tax Assessment Act 1997* (Cth) relating to tax exempt organisations and tax deductibility.

While meeting the requirements of the ACNC and ATO community broadcasters additionally are required to convince the ACMA that they are “not for profit, and not part of a profit-making enterprise”<sup>12</sup>.

### *Why is this a problem?*

The imprecision of this phrase in the BSA is out of step with modern definitions of not for profit status. The Explanatory Memorandum to the Act is unhelpful, and the Guidelines that flow from it are well overdue for consultation and revision. We argue the current arrangements impede the growth of the sector towards a sustainable future.

## Not part of a profit making enterprise

What is it to be “part of a profit making enterprise”?

The relevant Guideline admits that

*The Act does not provide a definition or an explanation of what is meant by the expression ‘part of a profit-making enterprise’. Therefore, the relevant ordinary meaning of the expression applies.<sup>13</sup>*

For want of any clarity about what the ‘relevant ordinary meaning’ is, the relevant instruments go on to attribute a meaning; one that we suggest is well beyond current understanding and practice about the operation of not for profits, charities and indeed social enterprises in Australia. Some commentary on the wording of those instruments is below.

*Even if only a limited part of the broadcasting service is used to generate revenue for the profit-making enterprise, the broadcasting service could still be regarded as forming part of the enterprise. While the licensee may enter into arrangements with a profit-making enterprise, for example, by paying the enterprise fees for services it provides, the broadcasting service cannot be used to generate revenue for that enterprise.<sup>14</sup>*

This wording (e.g. “could be regarded”) is imprecise and unhelpful. This is especially so given that the regulator does not provide advice to stations on specific situations (a theme we will return to below).

*Where the licensee’s broadcasting service is used to generate revenue for the benefit of a company, business or project set up for a commercial purpose, this would result in a breach of the licence condition. The licence condition does not prohibit contractual arrangements for normal station operations, sponsorship or fundraising activities. For a service to be ‘part of’ a profit-making enterprise, the broadcasting service must be being used in a direct way to generate revenue or profit for the commercial enterprise.<sup>15</sup>*

A literal reading of this Guideline *could* prevent; for example, community broadcasters from

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<sup>12</sup> BSA Section 15(b)

<sup>13</sup> ACMA, Community broadcasting not-for-profit Guidelines, February 17 2011, p5

<sup>14</sup> Ibid

<sup>15</sup> ibid

- Promoting or collaborating with some Registered Training Organisations to provide vocational training in broadcasting and media;
- Partnering with or promoting cultural enterprises, including musicians, local drama companies, publishers and authors, local art galleries, and promoters, to connect audiences with events suitable to their particular community interest;
- Partnering with or promoting a for profit provider of journalism (e.g. a local news service) to provide relevant news of local significance.

In short, the advice is problematic for much of the material that is the daily concern of audiences and the community, other than that which is done purely by nonprofit entities.

We emphasise the word *could*, because the real impact of trying to interpret this provision is to place community stations in a constant state of anxiety about inadvertently doing the wrong thing.

It gets worse. The outdated 1992 advice and the guidance based on it suggests governance behaviours that are inappropriate by today's standards.

### Surpluses

From the EM:

*[S]ome community broadcasters may have a modest operating surplus at the end of a financial year; this in itself would not exclude such a service from this category. So long as those surpluses are utilised for the continued operation of the service and are not distributed for personal use amongst those persons who are involved in the management or operation of the service, this criterion will be satisfied<sup>16</sup>.*

(In reproducing this section the Guideline leaves out the word “modest”; it is replaced with an ellipse.)

The governing bodies and senior management of community broadcasters deserve better than this. Good corporate governance involves responsible financial management, The notion that in 2024 these responsible persons should be cautioned against budgeting for surpluses is, in fact, contrary to their fiduciary duties.

### Salaries

The EM continues:

*However, this criterion would not permit a situation where a community broadcasting service was conducted in such a manner as to produce a large operating surplus which was then distributed in the form of large salaries, wages, allowances or fees to those persons involved in the management and/or operations of the service. Profit-making might include making a large surplus, especially if this is used for “large” salaries<sup>17</sup>.*

The issue of commensurate compensation is discussed below, but the proposition that paying salaries might be “profit making” is, frankly, insulting. It portrays a default position that community broadcasting is to remain impoverished, dependant on volunteer-effort (which the Roadmap identifies as an unsustainable proposition) and always cap-in-hand to government.

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<sup>16</sup> Broadcasting Service Bill 1992 Explanatory Memorandum, Clause 15

<sup>17</sup> *ibid*

The relevant Guideline speaks of “bona fide compensation for services rendered”. On the face of it this is reasonable; thankfully current ACMA practice is to judge compensation against market rates. But the imprecision of this creates uncertainty and potential jeopardy.

What is a “not large” salary? How is “bona fide compensation” measured? Is it less than a person employed in commercial or public broadcasting with the same role and responsibilities? Does it relate to audience size, turnover or the number of staff and volunteers?

Given the significant public policy outcomes attributed to community broadcasting as a sector, to impose an implied limitation on the salaries of paid staff is entirely unreasonable. Nor should it be necessary.

In the context of this sustainability review, we submit that the locus of policy should be towards encouraging stations to engage with their community, including the business community, in a way that will bring greater financial resilience to the station and less reliance on scarce government funds. It should be towards the best governance standards, not poor governance.

We submit that the phrase “not part of a profit making enterprise” is so difficult to interpret, creating ongoing jeopardy for broadcasters, that it is overly burdensome, puts unreasonable barriers in the way of genuine engagement with community, and in need of reform.

That a station is a lawful not for profit entity operating in line with the ACNC Governance Standards and ATO rules should be enough.

#### *A better way: ACNC standards*

ACNC Governance Standard 5<sup>18</sup> requires responsible persons (including directors or committee members and salaried staff) to act in the best interest of the charity and manage the charity’s finances responsibly. ACNC standards do not prohibit salaries, rather places guidelines around them.

Passing this level of regulation from the ACMA to the ACNC does not diminish the not for profit requirements of the BSA, but it does reduce the burden of compliance (while also presumably freeing up resources at the ACMA).

Community broadcasters are subject to the same reporting standards as other NFPs of a similar size. Recent reforms to those standards have improved public accountability and transparency.

We argue that no additional test need be applied by the BSA. It is enough to be a not for profit organisation. The notion that an NFP is “part of” a profit making enterprise is illogical. We suggest that for organisations registered with the ACNC the NFP requirements of the BSA should not apply.

From the promulgation of the Australian Charities and Not For Profits Commission Act 2012 (Cth), through the modernisation and harmonisation of state laws for incorporated associations, changes to the Corporations Act for companies limited by guarantee, up to recent changes to the Income Tax Act regarding income tax exemptions and gift deductibility, Australia has robust, transparent and recently reformed regulation of the not for profit sector.

Indeed, from the present tax year all not for profits (and therefore all community broadcasters) have new reporting requirements to confirm their tax exemption. Those stations not already

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<sup>18</sup> <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/5-duties-responsible-people>

registered with the ACNC are being encouraged to do so. Of note, all 36 Community Stations licenced to serve the Christian Community are registered with the ACNC.

There is a strong case to harmonise the not for profit requirement of the Broadcasting Services Act with the regulation of not for profits and charities by the ACNC and the ATO.

When a not for profit company (a company limited by guarantee) is registered by the ACNC, certain parts of the Corporations Act are “turned off”. This suggests a precedent for the BSA.

Whatever form the change takes, harmonisation would achieve sensible benefits

- Transparency and assurance of the non-profit status of community broadcasters
- Simplified reporting requirements and doing away with double regulation
- Clarity and certainty about the meaning of not for profit

### *Social Enterprises*

The development in recent years of the social enterprise model suggests a further way forward for community broadcast licensing. As an adjunct to the non profit charity model, regarding a station as a social enterprise whose role includes, say, training is in keeping with goals of Roadmap.

### *RECOMMENDATIONS*

**Recommendation 11. That registration as a charity with the ACNC be sufficient to satisfy the current not for profit requirements of the BSA,**

**Recommendation 12. That the ACMA commence consultations with the sector with a view to rewriting Community Broadcasting not for profit guidelines**

**Recommendation 13. That a social enterprise model of licensing be considered.**

### *Community participation*

The nexus between the station and its community interest is of critical importance. One way of ensuring this is to, in the words of the BSA, “encourage members of the community they serve to participate in the operations of the licensee in providing the service, and the selection of and provision of programs under the licence”<sup>19</sup>

Over the years, in explicating this provision for the purposes of regulation, a number of conventions have been applied.

This review provides an opportunity to examine their efficacy in light of current practice.

Rather than a detailed examination of these conventions our general proposition is that historically, the ACMA has measured inputs rather than outputs. A few are mentioned below.

### *Memberships and governance expectations*

The Authority monitors the number of members of the station’s entity, the rationale being one of corporate accountability (whether the station is an association under state law or a company limited by guarantee under federal law).

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<sup>19</sup> BSA 1992 (Cth), Schedule 2, Clauses 9(2)(c)

Caution should be taken however that an over reliance on membership numbers as a proxy for participation. In smaller and newer organisations membership is a reasonable indication of participation.

The Community Participation Guidelines largely presuppose an association model, where a committee of management and sub committees make operational decisions and are likely to be involved in those operations.

The Guidelines note that this represents “the majority” of stations, although we would argue it is increasingly out of step with practice of stations serving specialist communities such as First Nations, Religious – Christian, Religious – Islamic, Disability, Ethnic and Multicultural.

The original design of community broadcasting was that differences between licence categories would be met with different approaches to regulation<sup>20</sup>. Arguably, collapsing the former Category licences for public broadcasters into one Community Broadcasting Licence category, while having the effect of streamlining regulation, created a dilemma that would later be revealed; that generalist stations (those serving the general community need of a locality), would increasingly be different in scope to those serving specialist interests within communities.

### *Specialised community interests*

In generalist stations the emphasis is on access; access to free to air broadcasting for different groups and diverse perspectives within a general locality<sup>21</sup>.

For stations serving a specialist community interest the emphasis, we suggest, is slightly different. Here the issue of access can be seen from the perspective of an audience whose needs are underserved by other media.

A shift to outcomes and impact based reporting will increasingly draw attention to this difference.

To serve the Christian community well, CMAA members will continue to bring specialised programming that serves that community individually, collectively and in a way that provides unity despite geographic, denominational or demographic differences.

And here is the point. Programming and content that serves members of the Christian community has certain familiar characteristics regardless of locality. This is not just a matter of practicality but is deeply rooted in the nature of the Christian faith<sup>22</sup>.

## About the christian community interest

A defining characteristic of the Christian faith is that its members and adherents define themselves as a body – indeed the body of Christ, a spiritual union between believers (in the

<sup>20</sup> 36<sup>th</sup> Parliament, Senate Hansard, June 4 1992, (Senator Collins)

<https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22chamber/hansards/1992-06-04/0142%22;src1=sm1>

<sup>21</sup> Also the case for stations formed as consortiums.

<sup>22</sup> Here we do not presume to speak for other faiths or other specialised community interests, but we suggest the general premise, of finding self-realisation in bonding with others of similar belief, identity, language group, interest etc, stands up well.

words of the Apostle’s Creed “the communion of saints”) and the invitation to all, made possible through the death and resurrection of Jesus<sup>23</sup>.

This is not just a casual theological point (or a mini sermon) but a good way to understand how our members see their work and the way they serve the Christian community interest locally while connecting them to the needs and interests of other Christians globally.

As a sector we are hard-wired for collaboration, for service and to care for others; to love our neighbours. We are the first to acknowledge we often fail to live up to our own expectations. But we keep trying.

What does participation look like to members of the Christian community interest?

It is a much bigger idea than membership of an organisation, or service on a programming committee.

### *Participating through local activity*

In 2021 CMAA commissioned research into the social impact of Christian radio<sup>24</sup>. It gave insights into the unique value our audiences derive from our work. Among other things

Christian radio listeners are very active community members.

- 49% hold a leadership role in at least one community, political, charity or church group
- 75% hold a leadership role in an organisation serving their local community
- 28% hold a leadership role in a local school or educational facility

They respond to calls for participation from their local Christian station.

- 41% of respondents had reached out to help someone in their local community, specifically because of something they heard on their station.
- Three in four (75%) listeners volunteer in at least one community, political, charity or church group
- One in eight (13%) started to volunteer because of something they heard on their Christian station
- 19% increased their volunteering time because of the influence of their station.

### *Local participation examples*

Christian stations mobilise listeners through local action. A few examples.

- In the aftermath of the Townsville floods in 2019, Live FM mobilised volunteers to doorknocked over 17,000 homes for welfare checks and to assess need. Working with Townsville City Council Live FM partner organisation YWAM (a Christian ministry) provided direct and indirect assistance to flood victims.
- 96five Brisbane conducts an annual appeal for warm robes and blankets for women and children fleeing domestic violence, on behalf of the Brisbane Domestic Violence

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<sup>23</sup> These characteristics of the faith underpin christian community broadcasters’ contribution to social cohesion. In the terms of social capital theory, they represent both strong *bonding social capital*, and strong *bridging social capital*.

<sup>24</sup> The Social Impact of Christian Radio, McCrindle Research, 2021

Network. Some 270 donations were made directly from 96five listeners, a number that has been steadily growing over a 6 year partnership.

- Careline – over 15 stations to date have collaborated with Careline Connections to recruit and train volunteers to provide a service to their local community offering connection, counselling and reducing loneliness
- Hope 103.2 listeners in Sydney sponsored drought impacted NSW school children to attend Christmas holiday camps across 2019 and 2020. The ‘Kids to Camp’ initiative funded 536 children to attend Scripture Union camps across NSW.
- Sonshine (98five) in Perth runs an annual “Heart for the Homeless” campaign resulting in over 11,000 specific items donated by listeners annually through a collaboration with local schools, churches, businesses and community groups in partnership with three local homelessness services partners.
- Positive Media in Melbourne hosts an annual mental health event called “Relate”. It started during COVID as an on-air series and has now grown into a live event. In 2023, nearly 1,000 people attended the free event, where three mental health experts, including Dr. Michael Carr-Gregg, Dr. Jodi Richardson and Mel Winterbine, shared insights on anxiety. The experts volunteered their time, and participants registered through the radio station to receive support specifically focused on anxiety.

Below is a sample of participant feedback:

- *Hubby and I came last night. It was really helpful for him to recognize behaviours and actions in me that relate to the bell curve of anxiety. I feel like I love my life constantly in the yellow, dipping into the red, and back to yellow. To get to green would be amazing.*
- *I went to bed last night using Dr Jody's method of counting down the ABC of gratefulness, but smooshing it with Mel's message of kindness, and went through the alphabet thinking of kind things to tell myself. It felt good!!*
- *I fell asleep quickly, and slept well.*  
*Thanks for organizing, I really got such great advice, and so appreciate you guys organizing it. - Kathy*
- In September 2023, Rhema FM Newcastle held its first Foster Care Week. The goal of the event was to raise awareness about the needs in Foster Care in NSW such that people would have conversations about Foster Care in their own homes. The campaign brought together on-air stories from carers, children in care and organisations in the Foster Care space. There was special music with the launch of a song from a local artist around her experience as a Foster Carer and Social Media and e-campaign to accompany. The event partnered with many local community organisations including: Barnabas Foundation, Allambie Care, New Vine Care, Hearts and Hands, Samaritans, Anglicare, Wesley Dalmar and Catholic Care services.

### *Participating through financial support of stations*

Christian radio listeners participate through substantial financial support, helping our members to both sustain and grow their community impact. The snapshot below is an aggregate of income reported by our 36 CBL members in their Annual Information Statements to the ACNC. It shows significant private investment in the CBP through Christian radio.

<b>2015<sup>25</sup></b>			
Donations	Grants (inc CBF)	Sponsorship Sales/ Other	Total Annual Income
\$10,321,452.00	\$265,331.00	\$11,448,079.00	\$22,034,862.00
46.84%	1.20%	51.95%	

<b>2023<sup>26</sup></b>			
Donations	Grants (inc CBF)	Sponsorship Sales/ Other	Total Annual Income
\$17,262,780.00	\$161,248.00	\$11,198,570.00	\$28,622,598.00
60.31%	0.56%	39.12%	

### *Participation through financial giving to others*

CMAA members regularly call their listeners to financially support the charitable work of other not for profits in meeting both local and global needs. These appeals may be organised by individual stations in support of a local charity or coordinated on a sector-wide basis by CMAA. Some recent examples are briefly outlined below. In each case listeners have participated through financial or other giving specifically as a result of identifying with the call to action of their chosen station. Space precludes a comprehensive report, so we have chosen to highlight just the most recent campaign. Other examples are readily available on request.

#### *Example: Take Away Hunger Day, August 2024*

A nationally coordinated collaboration with the Christian charity Feed the Hungry, through whom a \$6 donation feeds a child in Uganda for a month.

- Listener donations resulted in over 140,000 children in Uganda being fed for a month – representing over \$840,000 given (to date) as a result of a single day event.
- 35 member stations participated<sup>27</sup>.
- Audio finger-printing data build up to the day recorded 6,792 promotional slots aired for free (valued in excess of \$250,000) on radio across the country.

A small sample of hundreds of listener comments attests to the level of engagement among listeners to this project.

#### *Life FM Adelaide*

- Shout out to Affordable Wheels & Tyres at Salisbury for having your station playing in their waiting room. Made me wanna give while I get my wheel alignment done. Martin, Salisbury Park.
- I was once a refugee living in a camp from age 6-21 years old. When my 10 and 5 years old children asked me this morning, "Mum what's feed the hungry?" I explained to them

<sup>25</sup> Primary data source: ACNC Annual Information Statements of CMAA members

<sup>26</sup> *ibid*

<sup>27</sup> Including one narrowcast member, Vision Christian Media



and they decided to give away their pocket money to feed (5) children for a month. "And what happens after that month?" My 10 year old asked. " Someone else will help them too, I said. I would like to thank all these wonderful people around the world that have been supporting Refugees all over the world. God bless. Florence, Ingle Farm.

#### Hope 1032 Sydney

- Dear Hope, thank you for highlighting this very important need. It still blows my mind that in our day and age, children still don't get their basic needs like food. I know I am blessed, and know I must do something. Even if it feels small. Katrina, The Ponds.
- I've just returned from Uganda and was really struck by how much we have in Australia by comparison. I spend \$6 on a coffee without thinking twice. Thank you for putting this on our radar so we can be generous with what we've been blessed with. Jenni, Armidale.

#### 89.9 The Light Melbourne

- I have been homeless with my children and we have experienced hunger and as a parent and not being able to buy food etc.. for my children and seeing them going without is the most heartbreaking experience I have ever lived through and experienced in my life. I am donating today to give a hand up to these precious souls who need our support, love and prayers. Elizabeth, Boronia.
- Last year I gave just \$6 to feed one child it was the last \$6 I had in my account this year I'm giving \$18 to feed 3 children on behalf of myself and my 2 children. Valentina, Greenbank

#### 96five Brisbane

- Hope this reaches the right hand.. I am also south Sudanese and I'm deeply touched by what you guys are doing for my people .. thank you very much , everyday at work when I listen to your station I realised how lucky I am to be in this country with countless opportunities and guaranteed food for the day ., a sign of hope is what they need and God is giving them the opportunity right now to feel that so I pray it goes along way and that he blesses the arms of those who reach out to him , in Jesus name. ❤️. Sunday, Taylor's Hill.

#### Pulse 94.1 Wollongong

- I would love to support Sudanese Refugees who are fleeing for their lives physically, emotionally and spiritually like the Israelites out of Egypt in order to worship God. I happened to buy take away food last night for my family on my way home from work because it was convenient and I was hungry. This is not our norm but I realised when I heard the ad on the radio that it was as easy as going to a drive-through to donate to this cause and feed between 5-10 children a month for the same money. Sarah, Cordeaux Heights.

#### 92.9 Voice FM Toowoomba

- I come from Africa and I understand poverty and homelessness, and I just want to be able to help in that area. Noel, Rangeville.

#### *Example: Mission Australia Hidden Homelessness Initiative, July 2024*

During July 2024, CMAA member stations partnered with Mission Australia to raise awareness of hidden homelessness and seek to provide ways that listeners can know the signs that lead to

homelessness. 29 stations were able to be part of this freely provided campaign in partnership with Mission Australia. As a result, during the campaign period:

- Over 9.598million listeners were exposed to radio content.
- 487 hrs of free content was broadcast with a value of \$272,164.
- 22,378 people viewed social content, resulting in 1061 people engaging with the content at a deeper level.

### *The changing nature of participation*

Just as the nature of volunteering is changing so too is the nature of participation in community organisations of many kinds. Studies such as the recent *Community Compass Research Report*<sup>28</sup> prepared by 89 Degrees East on behalf of Our Community and the Community Council for Australia, point to continuing changes in Australian patterns of engagement with community organisations.

Time poor, we are more likely to donate money or good on a regular (20%) or one-off basis (35%) than volunteer regularly (18%) or one off (14%).

Pertinent to the current discussion, as a form of engagement belonging to an organisation with membership fees sits at 19%, and to an organisation without fees 13%.

This and other studies suggest the way we measure participation in (and engagement with) community broadcasting needs a broader approach to measurement than at present.

### Measuring Participation: Summary

Compliance with community participation requirements should be more in keeping with the nature of the service and the characteristics of its community interest.

The current methodology reflects a model of operation that does not adequately reflect the diversity of the sector.

The move to outcomes reporting should be reflected as much in compliance monitoring as it is in reporting against funding. Both are significant in measuring the impact of the Community Broadcasting Programme.

This will become increasingly relevant due to changes in volunteering and changing attitudes towards the nature of involvement in community organisations.

### RECOMMENDATION

**Recommendation 14. That in demonstrating compliance with the community participation requirement the ACMA should increase the breadth of indicators used**

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<sup>28</sup> Dr. Rebecca Huntley et al, 89 Degrees East Pty Ltd 2024. Community Compass: A segmentation of Australia's views and engagement with the community sector.  
<https://www.communitydirectors.com.au/research/community-compass>

**to assess participation of the community interest in the management and operation of the service to include outcomes measurements such as:**

- a. fundraising support for the station including the amount raised and the number of donors**
  - b. audience survey data**
  - c. giving to and/or volunteering with community benefit organisations promoted by the station**
  - d. social media engagement and responsiveness to issues raised by the station**
  - e. listener feedback and testimonials (letters, emails, texts, voicemail)**
- participation in local community events promoted by the station, and**

**that further work be done on differentiating indicators according to the station's community interest. In other words that the practice of 'averaging' be replaced with an outcomes-based approach more suited to the specific values proposition of the serviced for its community interest.**

## Licencing to better support collaboration

Earlier we noted instances of collaboration among CMAA members that aim not only to provide for more efficiency but also result in improved programming suitable for the christian community interest.

The development of further collaborative arrangements, as envisaged by Roadmap, suggests the need to rethink the way these arrangements work from a licencing perspective.

We note that a precedent exists where a number of licences are held by a single charitable organisation, Vision Australia; a model that has secured those services to serve the particular needs of the vision impairment community in different markets.

We suggest this is a sensible model for the purposes of maintaining diversity of services, especially in smaller markets with limited capacity for fundraising and sponsorship. It is particularly suitable, we suggest, to ensure continuing service to specialised community interests as in the Vision Australia example.

In cases where one organisation holds licences in more than one market it would be important that they demonstrate to the ACMA continuing participation by the local community.

### *RECOMMENDATION*

**Recommendation 15. That in order to secure the viability of services for special community interests the ACMA permits licences for more than one locality to be held by a single organisation as in the Vision Australia model.**

## Sponsorship

Community broadcasting has an increasingly important role as part of the Australian media ecosystem. Yet to survive, let alone fulfil the increased responsibilities and expectations of audiences and government, additional investment is urgently required.

CMAA supports calls by other sector organisations for a substantial increase in funding for reasons outlined in both Roadmap and the 2024 CBAA budget submission.

Even if, as we hope, additional funding is provided the investment needed can not (and we argue should not) rest with government alone.

Data provided earlier in this submission speaks to the effort and commitment of our member stations and their supporters towards the success of a diverse community media sector.

With approximately 1% of member funding coming from government/CBF funds, our members are virtually entirely dependent on donations and sponsorships. In 2023 the ratio of income derived from donations to sponsorships by our members was roughly 60/40; in other words, for every \$1 gained through sponsorships, \$1.50 was raised from donors to meet audience needs and remain viable.

It is important to note that the capacity of stations to fundraise and seek sponsorship is as different as the communities and markets they serve.

Given the increasing demands on community broadcasters in the face of difficult economic times, increasing competitive pressures, elevated expectations of public good outcomes (such as public interest journalism) and a scarcity of public funding the case for lifting sponsorship limitations is overwhelming.

CMAA believes that the easing of current restrictions on sponsorship will assist in providing a sustainable future. We believe a more than reasonable approach would involve averaging the current 5 minutes per hour over each 24 hour period with a use it or lose it cap across that 24hr hour period; that is, 120 min of sponsorship in any one day at the discretion of the service.

Filling station inventories is already a difficult task and the yield from the currently allowable allocation is rarely if ever met. Averaging the permissible time is a regulatory reform that will assist many stations to source additional income in support of the increasing demands of both audience and government expectations.

Additionally, CMAA believes that the requirement for tagging is a relic of the past.

The inadvertent breaching of sponsorship requirements through failure to tag, or accidentally exceeding the hourly quota, represent yet another unnecessary and stifling barrier to the main task of community broadcasting: to serve the public interest through diverse and innovative programming.

## **RECOMMENDATIONS**

**Recommendation 16. That time restrictions on sponsorship be averaged across a 24 hour period (i.e. 5 mins per hour x 24 hours = 120 minutes in any one calendar day at the discretion of the station), and**

**Recommendation 17. That sponsorship tagging requirements be deleted.**

### *The sale of airtime anomaly*

The sale of airtime, suggested in the Guideline as a possible mitigation measure against profit-making, adds uncertainty and creates an anomaly that many struggle with. Take, for example the following scenarios:

- Selling 30 minutes of airtime to a local business is permissible (pending appropriate record keeping and transparency). Selling a 30 second sponsorship announcement to the same business counts towards the 5 minute per hour cap on sponsorships.
- Selling, or providing for free, 30 minutes of airtime to a charity or non-profit community group, would not breach the not for profit rules. If an agent or intermediary made the arrangement and received a benefit, it might (depending on the reasonable test).
- If the not for profit group wants to purchase a sponsorship announcement it counts towards the 5 minute cap; if the station airs it for free as a community service announcement it does not. (We will make further reference to this under Sponsorship.)

Notwithstanding our earlier recommendations on changes to the not for profit provisions of the BSA and changes to the sponsorship restrictions, we suggest that when a nonprofit organisation chooses to target the reach of their sponsorship message by paying for a sponsorship announcement this should not count towards the 5 minute cap. This measure would resolve an inherent contradiction in the arrangement that allow for the sale of airtime to a commercial enterprise not counting towards the sponsorship cap, while the sale of sponsorship announcements even to nonprofits does count towards the cap.

## RECOMMENDATION

**Recommendation 18. That paid sponsorship announcement on behalf on not for profit organisations be excluded from the cap on sponsorship minutes.**

## Other compliance and licencing issues

It is worthwhile to note that some of the issues raised in this submission have been aired previously. Despite the recommendations of several parliamentary inquiries over many years, little has changed to assist the sector to overcome regulatory burdens preventing it from fulfilling its true potential in serving the public good.

Among our review of these many inquiries one issue stood out: the sense of jeopardy felt by community broadcasters in remaining compliant, in the face of a lack of precision in the statutory instruments together with a lack of helpful advice from the regulator.

CMAA members do not want to be uncompliant. Fair dealing is central to their attitude to civil engagement.

They do nonetheless want to maximise the benefits of partaking in a free and diverse media sector, making their contribution to plurality and diversity in Australian media.

In June 2007 the House of Representatives Standing Committee on Communications, Information, Technology and The Arts tabled its second report on the inquiry into Community Broadcasting entitled *Tuning in to Community Broadcasting*<sup>29</sup>.

Among its findings and recommendations was an appeal for a change to the way the ACMA, as the sector regulator, relates to community broadcasters. Chapter 4 is particularly commended,

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[https://www.aph.gov.au/Parliamentary\\_Business/Committees/House\\_of\\_Representatives\\_Committees?url=cita/community\\_broadcasting/secondreport.htm](https://www.aph.gov.au/Parliamentary_Business/Committees/House_of_Representatives_Committees?url=cita/community_broadcasting/secondreport.htm)

as it outlines the sense in the sector that “community broadcasters have difficulty in interpreting regulations”<sup>30</sup>.

Despite goodwill by individuals CMAA members on the whole do not feel a level of support from the regulator. Even with recent improvements to the licence renewal process (the B66 form) our members constantly feel anxious – and in our experience unnecessarily so – about ongoing compliance and licence renewal.

CMAA commends Recommendation 11<sup>31</sup> of the 2007 House of Representatives Inquiry that the ACMA

- provide significant extension support to community broadcasting stations regarding sponsorship guidelines
- significantly increase its awareness raising workshops and campaigns in community broadcasting forums.

### **RECOMMENDATIONS**

**Recommendation 19. That the ACMA implement extension services in support of community broadcasting service compliance with licencing requirements, and**

**Recommendation 20. Implement a programme of engagement, education and training to assist managers and governance bodies in community broadcasting to understand and maintain compliance with relevant regulatory requirements.**

**END OF SUBMISSION**

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<sup>30</sup>Tuning in to Community Broadcasting, House of Representatives Standing Committee on Communications, Information Technology and the Arts, June 2007.  
[https://www.aph.gov.au/Parliamentary\\_Business/Committees/House\\_of\\_Representatives\\_Committees?url=cita/community\\_broadcasting/secondreport.htm](https://www.aph.gov.au/Parliamentary_Business/Committees/House_of_Representatives_Committees?url=cita/community_broadcasting/secondreport.htm)

<sup>31</sup>

[https://www.aph.gov.au/Parliamentary\\_Business/Committees/House\\_of\\_Representatives\\_Committees?url=cita/community\\_broadcasting/secondreport/chapter4.pdf](https://www.aph.gov.au/Parliamentary_Business/Committees/House_of_Representatives_Committees?url=cita/community_broadcasting/secondreport/chapter4.pdf)

## Summary of Recommendations

Recommendation 1. The Roundtable continue as a gathering of sector organisations, meeting as peers, to oversee rollout of the Roadmap. .... 6

Recommendation 2. That the Minister and Department continue their dialogue with the sector Roundtable by attending at least one meeting per year to discuss sector priorities and inform funding decisions..... 6

Recommendation 3. That new funds be made available to provide uncontested sector coordination support for eligible sector organisations on an equitable basis, with clearly defined goals and measurable outcomes. .... 8

Recommendation 4. That new funds be provided for an ongoing, contested, round of Sector Development grants, available to eligible sector organisations on an equitable basis with clearly defined goals and measurable outcomes. (But see proviso in recommendation 5 below)..... 8

Recommendation 5. That unless uncontested sector support funds are made equitably available the Sector Development 2024-2025 pool continue as a permanent line, but only to those organisations currently eligible. .... 8

Recommendation 6. News ..... 10

a. .... That a community broadcasting news building project be commenced outside of the regular funding stream..... 10

b. ... That the news project be considered a project of national significance and funded on a 5-year basis with a timeline developed to build news and current affairs making capacity in as many services as possible. .... 10

Recommendation 7. Collaboration establishment and development grants ..... 12

a. .... That a category of funding be made available to allow the establishment of collaborative and consortium models..... 12

b. That income caps on grants be eliminated for the purposes of a station assisting others through a collaboration or consortium approach. .... 12

Recommendation 8. Peer assessment ..... 14

a. That the peer assessment model should be improved with the provision of advice from CBF staff with expertise in financial and technical management, and reviewed with a view to understanding whether any lack of cultural awareness is leading to reduced success for Christian stations, and ..... 14

b. ... training be provided so assessors can be more culturally aware of the objectives and needs of stations serving community interests other than those of their own station. .... 14

Recommendation 9. Relevance of application questions..... 14

a. ... The collection of social and other data should be removed from grant applications unless it is directly related to the grant criteria. .... 14

Recommendation 10. Christian sector participation..... 14

a. ... That the CBF explore reasons for the low success rate of nominees for CBF board, committee and assessor positions and ..... 14

b. identify steps to address any lack of understanding of the needs of stations serving the Christian community interest including at governance level. .... 14

Recommendation 11. That registration as a charity with the ACNC be sufficient to satisfy the current not for profit requirements of the BSA, ..... 20

Recommendation 12. That the ACMA commence consultations with the sector with a view to rewriting Community Broadcasting not for profit guidelines ..... 20

Recommendation 13. That a social enterprise model of licensing be considered. .... 20

Recommendation 14. That in demonstrating compliance with the community participation requirement the ACMA should increase the breadth of indicators used to assess participation of the community interest in the management and operation of the service to include outcomes measurements such as: ..... 26

a. .... fundraising support for the station including the amount raised and the number of donors ..... 27

b. .... audience survey data ..... 27

c. .... giving to and/or volunteering with community benefit organisations promoted by the station ..... 27

d. .... social media engagement and responsiveness to issues raised by the station ..... 27

e. .... listener feedback and testimonials (letters, emails, texts, voicemail) ..... 27

participation in local community events promoted by the station, and ..... 27



that further work be done on differentiating indicators according to the station’s community interest. In other words that the practice of ‘averaging’ be replaced with an outcomes-based approach more suited to the specific values proposition of the serviced for its community interest..... 27

Recommendation 15. That in order to secure the viability of services for special community interests the ACMA permits licences for more than one locality to be held by a single organisation as in the Vision Australia model. .... 27

Recommendation 16. That time restrictions on sponsorship be averaged across a 24 hour period (i.e. 5 mins per hour x 24 hours = 120 minutes in any one calendar day at the discretion of the station), and ..... 28

Recommendation 17. That sponsorship tagging requirements be deleted. .... 28

Recommendation 18. That paid sponsorship announcement on behalf on not for profit organisations be excluded from the cap on sponsorship minutes..... 29

Recommendation 19. That the ACMA implement extension services in support of community broadcasting service compliance with licencing requirements, and ..... 30

Recommendation 20. Implement a programme of engagement, education and training to assist managers and governance bodies in community broadcasting to understand and maintain compliance with relevant regulatory requirements. .... 30