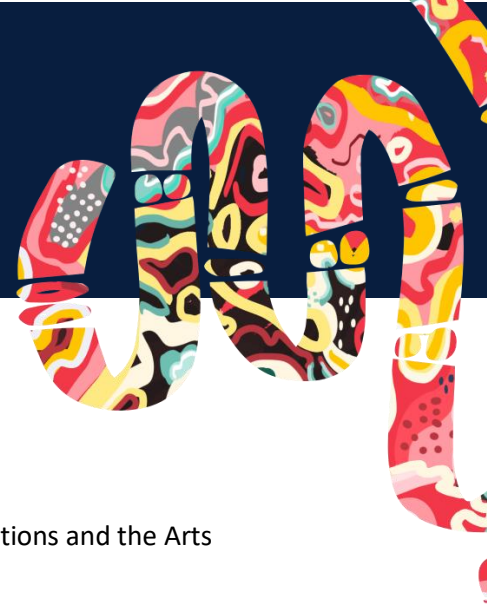




FIRST NATIONS
DIGITAL INCLUSION
ADVISORY GROUP



Director, Media Programs

Online Safety, Media and Platforms Division

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

6 September 2024

Dear XXXXX

The First Nations Digital Inclusion Advisory Group (the Advisory Group) welcomes the opportunity to provide feedback to the 2024 Community Broadcasting Sustainability Review (the review). We would also like to thank the Department for its engagement with us to date.

As you know, the Advisory Group was established by the Minister for Communications to provide advice on ways to support progress towards Target 17 of the National Agreement on Closing the Gap: equal levels of digital inclusion for First Nations Australians by 2026. This target underpins Outcome 17 of the National Agreement, which is focused on ensuring that First Nations Australians have access to information and services enabling participation in informed decision-making regarding their own lives.

In October 2023, the Advisory Group published its initial report, which is available here: [Initial Report | First Nations Digital Inclusion Advisory Group](#). Drawing on our recommendations, the 2024-2025 Commonwealth Budget announced \$68 million of funding for First Nations digital inclusion, which will be used to implement the following initiatives:

- \$20 million for the roll-out of free community Wi-Fi in remote communities through a new contestable program. This is in addition to the \$20 million funding for free Wi-Fi to around 23 communities that is being delivered by NBN Co and was announced in February
- \$22 million to establish a First Nations Digital Support Hub and a network of digital mentors
- \$6 million to expand the Australian Digital Inclusion Index to improve the national collection of data on First Nations digital inclusion.

While we were pleased to see these measures funded through the Budget, we are concerned that on their own, they will not be enough to address the entrenched inequality in connectivity options and services for First Nations people in regional and remote communities. The Advisory Group is also disappointed at the lack of increased funding allocated to the First Nations media and broadcasting sector, noting the crucial role that the sector plays in the lives and wellbeing of First Nations communities across Australia.

We wrote to Ministers Rowland and Burney earlier this year to flag our support for First Nations Media Australia's (FNMA) Pre-Budget submission, which outlines much of the information provided in the attached appendix. We are also engaging with peak bodies across the sector, including FNMA, the Community Broadcasting Association of Australia (CBAA), the Community Broadcasting Foundation (CBF), along with First Nations media and broadcasters across Australia to ensure their views help inform the First Nations digital inclusion roadmap which we are currently developing.



We will also continue to advocate strongly for further action in line with the media and broadcasting recommendations in our initial report, including recommendations to:

- improve alignment across Government on First Nations digital inclusion policy and the delivery of relevant programs (ie. consolidation of First Nations and community broadcasting in the communications portfolio)
- upgrade broadcasting and digital infrastructure to meet current industry standards and work health and safety requirements
- fund a trial for rebroadcasting technology in remote First Nations communities as an alternative to VAST.

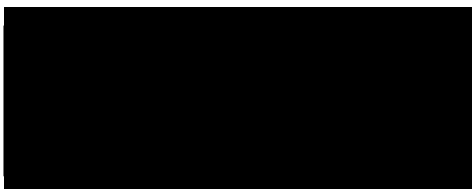
Throughout our engagement to date, we have heard clearly that there is a desperate need for continued and increased funding for the First Nations Media sector. A number of First Nations media organisations, including the National Indigenous Radio Service (NIRS), have indicated to us that without new funding, they face having no choice but to significantly scale back on their operations, which will include staff layoffs. While not within the scope of this review, we strongly argue that the sector is critical in supporting media diversity, strong local news organisations, and public interest journalism.

Our submission echoes FNMA's Ten Calls for Action and the Community Broadcasting Association of Australia's (CBAA) Roadmap 2033. We note that the Government has been aware of FNMA's Calls for Action since they were released over five years ago. The lack of action on these Calls for Action is disappointing, and the First Nations media and broadcasting sector is experiencing serious 'consultation fatigue'. The Advisory Group urges the Government to commit to the Calls for Action, given that they are still contemporary and represent the sector's positions on the types of reforms needed to ensure ongoing sustainability.

We also urge the review to consider Priorities 1, 3 and 4 of the National Agreement on Closing the Gap, which relate to Formal Partnerships and Shared Decision Making; Building the Community Controlled Sector; and Shared Access to Data and Information at a Regional Level.

The Advisory Group would be happy to expand on the comments made within this letter. To arrange a meeting, please contact our secretariat at firstnationsdigitalinclusion@infrastructure.gov.au.

Yours sincerely



Ms Dot West OAM
Co-chair
First Nations Digital Inclusion Advisory Group



Associate Professor Lyndon Ormond Parker
Co-chair
First Nations Digital Inclusion Advisory Group



Submission to the Community Broadcasting Sustainability Review

Governance

The Advisory Group recommends that responsibility for the First Nations broadcasting policy area of the Government be transferred from the National Indigenous Australians Agency (NIAA) to the Communications portfolio. This would include the recognition of First Nations broadcasting as a separate category of broadcasting under the *Broadcasting Services Act 1992* (the BSA), in line with First Nations Media Australia's (FNMA) Call for Action 1.

As noted in FNMA's Calls for Action, the lack of separate categorisation for First Nations broadcasters under the BSA has meant they have been omitted from discussions on broadcasting regulation and reform led by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

In moving this function into the Communications portfolio, the Department of Infrastructure, Transport, Regional Development, Communications and the Arts would oversee the administration of the Indigenous Broadcasting and Media Program (IBMP), which is explored in more detail throughout this submission.

Recommendation:

- **The Advisory Group recommends that the responsibility for First Nations broadcasting policy be brought under the Communications portfolio of the Federal Government.**

Funding

The lack of indexation on operational funding for the First Nations media and broadcasting sector is a significant barrier to the growth and sustainability of local First Nations media organisations, and the Advisory Group urges the review to consider how this can be remedied. This also includes improving funding to First Nations Media Australia (FNMA) as the peak body. A lack of improved funding will continue to hinder the ability for First Nations media organisations to maintain facilities to industry standard.

In their pre-budget submission to Treasury earlier this year, FNMA outlined how real funding levels for the IBMP have deteriorated over time. This means that current funding levels are insufficient to meet community needs for services. If this is not addressed, media organisations will continue to struggle over time, and many will have to reconsider the scale of the services they provide, with some having no viable choice but to close. Current funding levels are insufficient and prevent organisations from:

- meeting increased costs for staffing, facilities and operations
- meeting growing community needs for services
- supporting efficient, multi-year grant making
- responding to changing technological, social, environmental and economic trends
- supporting investment to build resilience and support innovation
- achieving social and economic outcomes for community.

In particular, the costs for broadcasters operating in remote communities are all increasing rapidly, including those for basic operational requirements such as petrol for travel, staffing, insurance, training and repair and maintenance of equipment and facilities. We understand that across the sector, operating



expenditure relative to revenue is rapidly increasing, which means many broadcasters do not have enough funding to commit to operating beyond the next six months. On top of this, the audience needs have diversified with the expansion of social media and online platforms, resulting in significantly reduced revenue from sponsorship and information campaigns for broadcasters. Combined with the lack of funding, this has left many media organisations unable to adapt to changing audience expectations.

The Advisory Group strongly encourages the Government to increase real levels of funding to the sector and committing to ongoing indexed funding for the IBMP as a Federal budget measure. It is vital that basic operational funding is addressed in order for other initiatives to be considered and implemented.

The Advisory Group also recommends funding for an ongoing infrastructure and equipment upgrade program, particularly for remote broadcasters who often have outdated and limited infrastructure to deliver messages and information to First Nations people in hard-to-reach areas. This is in line with recommendation 1.11 in our initial report, which recommends that the Government upgrade broadcasting and digital infrastructure to meet current industry standards.

In addition to infrastructure challenges, there are a number of Remote Indigenous Broadcasting Services (RIBS) which are currently unable to meet workplace health and safety requirements, which further affects their ability to hire and retain staff, threatening the overall long-term sustainability of the sector. The provision of technical services is a key area that has been largely neglected within the IBMP, especially for remote organisations where technician, travel and freight costs are high. The Advisory Group notes that there are many RIBS services that are not working as a result of a lack of maintenance funding.

Recommendations:

- **The Government should commit to increased levels of funding including ongoing indexed funding for the Community Broadcasting Program and IBMP as a Federal budget measure.**
- **The Government should fund an ongoing infrastructure and equipment upgrade program for First Nations media organisations.**
- **The Government should consider how the national broadcasters can collaborate with the First Nations media and broadcasting sector more effectively.**

Licensing

In line with sector advocacy for over 20 years, the Advisory Group recommends the development of a **new broadcasting licence for First Nations broadcasting services**. This would allow for flexibility in licensing requirements, better reflecting the unique characteristics and status of First Nations broadcasting, which differs from the community broadcasting sector in being a primary and essential service for its audiences rather than a supplementary service.

Current licensing arrangements are costly and create significant administrative burden, particularly for organisations with multiple licences. Additionally, in being categorised in the BSA under the community broadcasting category, First Nations broadcasters are made to compete for spectrum with community broadcasters.

This has led to, and continues to contribute to, a disparity in the provision of First Nations broadcasting in a number of cities across Australia, including the capital cities of Adelaide, Canberra and Hobart. In being categorised alongside community broadcasting organisations, First Nations media organisations are less



able to participate in the co-regulatory processes of the wider broadcasting industry and their financial position.

Additionally, in categorising First Nations broadcasting under the community broadcasting category under the BSA, First Nations media organisations face limitations on sponsorship. Under the BSA, community broadcasters are only permitted to have 5 minutes of sponsorship/advertising time per hour.

Alternative streams of income adopted by mainstream community broadcasters such as membership and community fundraising are not necessarily applicable or appropriate in First Nations settings. As such, a separate licencing category would open up advertising and sponsorship opportunities for First Nations media organisations, thus improving the overall sustainability of the sector.

Recommendation:

- **The Government should establish a new broadcasting licence for First Nations broadcasting services to recognise their role as essential services, allow for more flexibility around revenue streams and improve access to spectrum.**

Training and Employment

As mentioned, the training and development of staff is critical to the ongoing sustainability of the sector. However, it is costly and difficult to deliver suitable training, given poor funding and the challenges faced by remote broadcasters. The Government should consider how the Community Development Program (CDP) and Remote Jobs and Economic Development Program (RJED) can be adapted or expanded to accommodate the First Nations media and broadcasting sector.

Additionally, the sector would benefit from the recognition of the creative industries as a 'profiled sector' across the national training ecosystem. This would help with training in the sector being prioritised and better recognised as a viable career path.

The First Nations media and broadcasting sector also differs from the broader community broadcasting sector in providing employment for most operational staff and broadcasters rather than being based on volunteerism. Given low incomes and lack of meaningful employment options for many First Nations people, a volunteerism model would not be viable to sustain the sector. As such, there is an urgent need for investment in culturally appropriate employment programs, including traineeships and professional development pathways in management and governance, training delivery, project management, production and IT services. Recognition of the diversity within the sector would expand career options in related fields of journalism, online communications, music production and technical services.

There is an opportunity to increase employment and training opportunities in the First Nations media and broadcasting sector through engagement with the RJED. There may be scope to align training opportunities in the sector with the RJED program, which in turn may help sustain employment among First Nations media organisations. The Advisory Group recommends that the Government consider how to assist remote First Nations media and broadcasting organisations to engage with the RJED program to identify and fund jobs in community.

Additionally, poor funding levels make it difficult for media organisations to attract and retain staff. First Nations media and broadcasting organisations often find that once staff are trained, they leave the sector for better salaries available elsewhere, including at non-First Nations media organisations such as ABC/SBS.



While the sector has played an important role a training ground for many successful careers, the loss of talent can be problematic for First Nations media organisations competing for audience with ABC and SBS.

Overall, an adequately funded and sustainable employment pipeline in the First Nations media and broadcasting sector is critical to providing career pathways and delivering information and culturally relevant content to First Nations communities across Australia. It is therefore an integral part of achieving CTG Outcome 17.

Recommendations:

- **The Advisory Group recommends that the creative industries, and First Nations media and broadcasting, be recognised and profiled within the national training ecosystem.**
- **The Advisory Group recommends that the Government consider how to assist remote First Nations media and broadcasting organisations to engage with the RJED program to identify and fund jobs in community.**