

## First Nations Digital Inclusion Advisory Group

As First Nations Creative Agencies and also, Suppliers under the Government Communications Campaign Panel (GCCP), we are in a unique position to provide valuable feedback about whole of government approaches and advise where further improvements can be made to make communication more effective, to maximise impact and increase positive outcomes for First Nations peoples.

*The Government Communications Campaign Panel (GCCP) is a mandatory whole-of-government panel of communications suppliers who work on Australian Government advertising and information campaigns.*

*The GCCP provides a coordinated, whole-of-government approach to campaign development. Non-corporate Commonwealth entities subject to the Public Governance, Performance and Accountability Act 2013 (PGPA Act) must use the GCCP where they have a need for external communication expertise, and the campaign is expected to be above the value of \$500,000.<sup>1</sup>*

Our feedback is outlined below and summarised here:

- A lack of First Nations audience media consumption research means paid government advertising is being placed without evidence of effectiveness.
- Paid government media placement on mainstream digital platforms often dominates media buys with little to no evidence it is effective in reaching First Nations audiences.
- First Nations people living in remote areas of Australia with zero to limited digital access are excluded from paid government advertising if alternative First Nations Media channels are excluded in the media buy (e.g. local First Nations radio and/or print).

### **Lack of current audience media consumption research**

One of the fundamental challenges faced in Government Campaign communications is a lack of evidence on audience consumption research to meet the needs of First Nations audiences in urban, regional and remote areas. As a result, often a mainstream, general population approach is taken which often prioritises digital placement as a cost-effective approach recommended by media buyers to deliver campaign messages.

We note, the most recent research of this kind commissioned by the Federal Government, *Media consumption and communication preferences of Aboriginal and Torres Strait Islander audiences<sup>i</sup>*, was undertaken almost a decade ago in 2014. Further, the Department of Infrastructure, Transport, Regional Development, Communications and the Arts *Television and Media Survey 2022<sup>ii</sup>* does not include a breakdown of First Nations channels or audiences.

However, since this time, significant changes to the media landscape and media consumption, as well as demographic and geographic changes have occurred, including a 25

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percent increase in the number of people identifying as Aboriginal and or Torres Strait Islander peoples recorded in the Census in 2021<sup>iii</sup>.

A lack of research and data on the critical role of First Nations media channels, means that often broadcast channels such as remote community radio or tv are not considered as alternative channels. For example, if the campaign is a digital video led approach, then no alternative digital channels are considered to reach Aboriginal and Torres Strait Islander peoples.

This is problematic for several reasons:

- Ineffective or restrictive audience targeting on digital channels, based on platforms inability to target based on race, and a lack of evidence in programmatic offerings effectiveness
- Brand safety of Government content appearing across platforms in tandem with content that is racist and causes online harm, as evidenced by the Online Safety Commissioner
- Digital literacy and inclusion gap for First Nations people compared with non-Indigenous Australians, that significantly increases with remoteness, recorded by the Australian Digital Inclusion Index<sup>iv</sup>
- First Nations community controlled (not for profit) media entities play a vital role in reaching people in rural and remote areas, and are missing out on valuable advertising revenue, due to a lack of data and effectiveness and being measured against large commercial media entities

The Master Media Buying Agency's often preferred digital first approach when communicating key messages does not adequately consider the geographic diversity or audience needs of First Nations peoples—some of whom are among the most disadvantaged in the country—and they are therefore missed by campaign information on essential government programs and services. A digital only approach misses 670 out of 1545 First Nations communities who do not have mobile coverage and access to community WIFI.<sup>2</sup> Not to mention the high data costs of pre-paid mobile services, used by 90 percent of First Nations people in communities which have access to mobile coverage<sup>3</sup>. In these communities, First Nations radio forms the primary channel for communications.

The Campaign Advertising by Australian Government Departments and Entities Report 2021–22 states a 'total of \$239.6 million was spent on all campaign advertising media placement during the reporting period, including \$17.6 million on ethnic media and \$6.5 million on Indigenous media.'

However, we note that many of the campaigns we are involved in are not investing in First Nations specific media, but rather mainstream channels that propose to effectively target

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<sup>2</sup> First Nations Digital Advisory Group Interim report. Pg 14 based on BCARR data.

<sup>3</sup> First Nations Digital Advisory Group Interim report, Pg 15 based on Featherstone, D, Ormond-Parker, L, Holcombe-James, I, Hawkins, L, Bukulatjpi, Y, Bukulatjpi, C, Thomas, J & Kennedy, J (2022) Mapping the Digital Gap: Galiwin'ku, East Arnhem Land NT Community Outcomes report 2022. ARC Centre of Excellence for Automated Decision Making and Society: RMIT University, Melbourne. DOI: 10.25916/vjtt-mb25

Aboriginal and Torres Strait Islander audiences. While digital platforms provide an estimated reach figure to support this placement, they are not able to confirm if this is in fact reaching Aboriginal and Torres Strait Islander peoples as intended, and in many instances is not picked up in evaluation to verify effectiveness of future placement.

Many campaign evaluations are also not adequately capturing how effectively the campaigns are reaching First Nations audiences. There is not a mandatory requirement to evaluate with First Nations audiences as part of the whole of government arrangement, and when it is undertaken, there is often insufficient First Nations participants to extract, measure and analyse First Nations learnings nationally. The result is an ongoing lack of understanding about the effectiveness of the \$6.5million annual investment (in 2021-22) to reach Aboriginal and Torres Strait Islander peoples through paid advertising. This in turn does not provide data on the challenges of digital only approaches not adequately reaching or supporting the information needs of First Nations Peoples.

### **Policy drivers for change**

A stronger evidence base on the information needs and channels to best reach Aboriginal and Torres Strait Islander peoples and communities is important to ensure information is not disadvantaging people without access to digital channels.

There are several existing policy commitments by the Federal Government that could be used to enhance the effectiveness of Government advertising and communication by embedding strong partnerships with Aboriginal and Torres Strait Islander community-controlled sectors.

The First Nations Media sector provided an essential and very effective role in reaching Aboriginal and Torres Strait Islander peoples nationally during both the COVID-19 pandemic and more recently the Voice Referendum.

Building a stronger evidence base for the First Nations media sector would also provide a mechanism for supporting progress in the Closing the Gap Priority Reform areas. Further evidence of the need for systems change in the communication approach for Aboriginal and Torres Strait Islander communities is evidenced in the Closing the Gap Annual Data Compilation Report July 2023 which shows only 4 of the 19 targets<sup>v</sup> are on track to be met.

The Productivity Report also outlines a need for greater Government progress in priority reform areas, including *Formal Partnerships and Shared Decision Making, Building the Community Controlled Sector, Transforming Government Organisations and Shared Access to Data and Information at a Regional Level*.

Once an evidence base is established, several actions can be considered to harness the capacity of First Nations media entities, acknowledging the importance of non-digital channels to reach communities.

We have raised these concerns directly with the Department of Finance Communications Branch where they are under ongoing consideration.

Regards

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<sup>i</sup> *Media consumption and communication preferences of Aboriginal and Torres Strait Islander audiences*, Commonwealth of Australia, Department of Finance, Communications Advice Branch (2014)  
<https://www.finance.gov.au/government/advertising/indigenous-audience-research>

<sup>ii</sup> *Media Content Consumption Survey (MCCS)*, Social Research Centre, Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2022)  
Centre, <https://www.infrastructure.gov.au/media-communications-arts/television/television-media-surveys>

<sup>iii</sup> *Estimates of Aboriginal and Torres Strait Islander People*, Australian Bureau of Statistics, Census (2021)  
<https://www.abs.gov.au/statistics/people/aboriginal-and-torres-strait-islander-peoples/estimates-aboriginal-and-torres-strait-islander-australians/latest-release>

<sup>iv</sup> *Australian Digital Inclusion Index*, First Nations Dashboard (2022)  
<https://www.digitalinclusionindex.org.au/dashboard/FirstNations.aspx>

<sup>v</sup> *Closing the Gap Annual Data Report*, Productivity Commission, <https://www.pc.gov.au/closing-the-gap-data/annual-data-report> (2023)