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Communications Infrastructure Division
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A Roadmap for First Nations Digital Inclusion

Thank you for the opportunity to contribute to this consultation in response to the First Nations Digital Inclusion Roadmap—Discussion Paper *(Discussion Paper)*.

> *The Community Broadcasting Association of Australia (the CBAA) acknowledges the Traditional Custodians of Country throughout Australia.*
>
> *The CBAA is based on the lands of the Gadigal People of the Eora Nation. We acknowledge First Nations' sovereignty and recognise the continuing connection to lands, waters and communities by Traditional owners of Country throughout Australia. We pay our respects to Aboriginal and Torres Strait Islander cultures; and to Elders past, present and emerging. We support and contribute to the process of reconciliation.*
>
> *We acknowledge Aboriginal and Torres Strait Islander people have been telling stories for millennia and we continue this rich tradition of sharing, protecting and enhancing culture. We honour the dedication and expertise of First Nations broadcasters and their work to strengthen and connect communities.*

The CBAA represents community broadcasters delivering over 500 AM/FM/DAB+ services that reach almost 5.2 million people across Australia each week. Our members include 51 First Nations organisations providing 158 services, the vast majority in regional and remote areas. First Nations Australians are 44% more likely than the general population to listen to community radio[1]. Community broadcasting is an essential service, delivering relevant local content and community resilience.

The sector's role was comprehensively recognised in the *First Nations Digital Inclusion Advisory Group Initial Report ("Initial Report")*. We affirm points raised in the Discussion Paper about community broadcasting, including:

> "The importance of the media and broadcasting sector in addressing the digital divide must not be understated. More specifically, the media and broadcasting sector plays a vital role in providing communities with important information, and contributes to preserving culture and language through storytelling and content creation.
>
> First Nations community media provides information, news, education and entertainment, which directly supports Outcome 17. They also provide local employment opportunities, whether through content creation, local journalism and media production, or technical positions for maintenance and IT support".

Some issues raised in the Discussion Paper are also being considered by the current *Community broadcasting sector sustainability review discussion paper* ("*Sustainability Review*") consultation, in which First Nations broadcasting funding and licensing is a priority area. Indigenous broadcasting is also a focus of the *Community Broadcasting Roadmap 2033* ("*Roadmap 2033"*) and the *CBAA Federal Pre-budget submission 2024-5*. These in turn address well recognised concerns raised in the *Initial Report* and the earlier *Renewing a Vital Indigenous Voice and Community Asset – The Indigenous Broadcasting and Media Sector Report ("Watson Report").*

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[1] Community Radio Listener Survey - July 2024

The Digital Inclusion Roadmap is an opportunity to translate these recommendations and complementary Closing the Gap policy goals into action. This submission contends that the Digital Inclusion Roadmap will not be effective unless it includes, as critical and essential elements that:

1. the Sustainability Review delivers immediate budget funding increases from the CBAA Federal Pre-budget submission 2024-5. i.e. a near doubling of community broadcasting funding.
2. First Nations Media Association of Australia ("*FNMA*") 10 Calls to Action are adopted in the Government's funding and regulatory strategies.
3. there be targets for short-, medium- and long-term extensions of digital radio broadcasting services to all major cities and markets moving to DAB+ transmission.
4. there be a plan for ongoing maintenance and upgrading of aged transmission infrastructure.
5. relevant cultural content is available to all First Nations communities, metro, regional or remote.

CBAA commends the submission from First Nations Media Australia (FNMA). CBAA and FNMA work closely together on matters impacting the sustainability of the First Nations community broadcasting sector. We refer the Department to FNMA's submission regarding recommendations addressing digital mentoring and employment and skills development for First Nations media.

Broader policy context

The centrality of First Nations culture is recognised in Pillar 1 and across all 5 pillars of Revive – *A National Cultural Policy*. This policy includes an action under Pillar 5 to: "increase support for community broadcasting to deliver local news, tell local stories, and provide a platform for diverse voices and Australian music". It also highlights the work of First Nations broadcasters in supporting and strengthening First Nations languages and connections to culture in communities across Australia. It is essential that relevant commitments in *Revive* are now realised through the Digital Inclusion Roadmap.

Recommendation #1
That the Roadmap include goals and short-term actions that deliver the actions and commitments made in the *Revive* national cultural policy including increasing support for community broadcasting.

Context of our recommendations
This submission is anchored in extensive work undertaken in the community broadcasting sector to develop the co-design of Roadmap 2033 with stations, staff, volunteers and industry experts and through research, data analysis and surveys. Roadmap 2033 involved extensive consultation with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts and includes supportive forewords from the Minister for Communications and the Minister for Arts.

Roadmap 2033 is an essential contribution to the Sustainability Review. Its development included significant analysis of issues specific to the First Nations sector as well as broader sector issues relevant to First Nations broadcasters and audiences. Roadmap 2033 refers to and draws on actions identified in the First Nations Media Association 9 Calls to Action, described in the Discussion Paper as "a valuable basis for considering how to best support the sector moving forward" plus the more recent additional Call #10 to "Improve Access to Digital Services", which specifically addresses Indigenous digital inclusion.

Call to Action #10 involves working collaboratively with the First Nations Digital Inclusion Advisory Group and digital access, mentoring and training programs to close the gap on digital inclusion:

o Facilitate access to media services and online platforms
o Provide training and mentoring programs in digital literacy
o Training 'community digital champions' who live and work in the community and can be at call when there are issues of access and digital
o E-safety programs to accompany the technical rollout of new services, and with content providers (such as Facebook, TikTok, etc) taking more responsibility for the provision unsavoury content

The outcomes include: to increase digital inclusion, improve digital literacy and safety among First Nations Communities and increase and improve training and employment opportunities in regional and remote areas, and therefore comprise essential elements of the Digital Inclusion Roadmap.

Recommendation #2
That the Roadmap include goals and short-term actions that deliver 10 FNMA Calls to Action.

Sustainability Review

The Department's Community Broadcasting Sustainability Review references the Watson Report, which states that:

> "sector capacity to meet community and government expectations is limited. This is due to no real funding increase in a decade and revenue constrained by ACMA regulations; ageing equipment and facilities impeding service delivery, and limited staff training and development opportunities available.

The Sustainability Review is considering funding needs under the Indigenous Media and Broadcasting Program (IMBP) and Community Broadcasting Program (CBP), which includes the heavily oversubscribed First Nations Broadcasting Fund (FNBF). Services funded under the IMBP are not eligible to apply for core operations grants under the CBP. This structure also enables complementary funding opportunities (while preventing duplication or perceived double-dipping).

The Sustainability Review also notes that the IBMP has been found by successive reviews to be "substantially under-resourced" and refers to calls for consolidation of Commonwealth investment in one department to maximise impact. Agreements committing funding to the IMBP under the Indigenous Advancement Strategy (IAS) need to be renewed before next financial year. This imminent gap needs to be urgently addressed in the Digital Inclusion Roadmap and in the Sustainability Review.

As outlined above, the community broadcasting sector has proposed funding solutions for sector issues through Roadmap 2033 and the CBAA 2024-25 Federal Pre-budget Submission and we will continue to press these and other solutions through the Sustainability Review process. Without these foundational elements, the media and broadcasting aspects of the Digital Inclusion Roadmap will be unsustainable. Each of the above processes, and the recommendations that flow from them have involved significant First Nations input and align with FNMA's 10 Calls to Action.

Recommendation #3

That the Digital Inclusion Roadmap goals include implementation of the Community Broadcasting Roadmap 2033 and support the delivery of CBAA and FNMA's Budget Submission as outcomes of the Sustainability Review.

RESPONSE TO CONSULTATION PAPER QUESTIONS

> **Media and broadcasting question**
> *How can government and industry support First Nations media organisations to be sustainable in the long term?*

As outlined below, digital inclusion will be achieved by:

1. Increasing funding for First Nations community broadcasting services.
2. Maintaining/extending First Nations media services and their reliability, ensuring availability across Australia free-to-air (or where not possible, on an affordable basis).
3. Supporting quality First Nations cultural content on all services.

1. *Adequate, ongoing, indexed funding*

The single most important action for the sustainability of the First Nations broadcasting sector and for Indigenous digital media inclusion is for the Government to implement the requested 2024-25 budget, based on the Community Broadcasting Roadmap 2033. This funding represents the most basic foundations needed for the sector, before any further initiatives can be considered or implemented. The sector's funding requests are essential to the success of the Digital Inclusion Roadmap.

As identified in the CBAA Federal Pre-Budget Submission , the FNMA Pre-Budget Submission and acknowledged in the Sustainability Review Consultation Paper, real levels of funding in the Indigenous Broadcasting and Media Program (IBMP) have deteriorated significantly over time, as they have more generally for community broadcasting. We also support the funding delivered for Inclusion Measures referred to in this consultation which are not included in our 2024-5 budget submission.

As outlined in the CBAA Pre-Budget Submission, program funding for Indigenous broadcasting in 2023/24 is $7.6m less than it would have been had real funding been maintained over the last decade (2014/15 levels). As result of the decline in real funding, First Nations stations maintain high operating costs as a proportion of income.

The resulting fine operating margins mean stations are less able to invest in medium and long-term business activity, resulting in diminished services and difficulty maintaining operations. First Nations stations are also impacted by the decline, in real terms, of funding delivered under the Community Broadcasting Program, which they are also able to access through the Community Broadcasting Foundation. In real terms, funding levels in this program in 2023/24 were $5.2m less than in 2017/18.

The CBAA affirms the Digital Inclusion Advisory Group's Initial Report (*Initial Report)* statement that:

> "As part of its digital inclusion roadmap and following the conclusion of other government processes such as the review of community broadcasting, the Advisory Group will consider the need to increase funding across the First Nations broadcasting sector as a whole."

The Sustainability Review Discussion Paper (p8) canvasses options for funding to be brought under one department as "successive reviews into the First Nations broadcasting and media sector have called for consolidation of Commonwealth investment to maximise impact. This was also referred to in the Digital Inclusion Advisory Group's Initial Report.

The CBAA agrees that, to ensure effective co-ordination and leveraging of Indigenous media funding with other community broadcasting funding sources, the IBMP should be brought within the Community Broadcasting funding program in the Department of Infrastructure, Transport, Regional Development and Communications (DITRDC). This should occur on the basis that the future governance and management of the IBMP delivers on Priority Reform One "Formal Partnerships and Shared Decision-Making" and Priority Two "Building the Community Controlled Sector" of the National Agreement for Closing the Gap.

Recommendation #3
That the Digital Inclusion Roadmap include continuation of IMBP funding as an ongoing program and as an indexed Federal budget funding measure.

Recommendation #4
That the Digital Inclusion Roadmap consider First Nations broadcasting funding to be consolidated under the DRTIDC to ensure effective and co-ordinated support, and be delivered in genuine partnership with First Nations communities and enhancing community control.

Recommendation #5
That increased funding, as outlined in the CBAA 2024-25 Budget Submission, are an outcome of the Sustainability Review and 2024-25 Federal Budget decisions be treated as an essential and foundational element of the Digital Inclusion Roadmap and that this funding is indexed.

2. *Digital inclusion through the extension of Indigenous digital radio services across Australia*

As noted in the Discussion Paper, many locations in Australia lack the benefit of a full-time First Nations free-to-air radio service, including major cities and 3 capital cities. Filling these service gaps should be regarded as an essential element of digital inclusion, and this aligns with findings in the *Initial Report*.

Radio receivers, whether AM, FM or DAB+ digital radio, are readily available at a low cost, are easy to use (without the need for connectivity, data plans or location/activity tracking) and are particularly important in regional and remote communities during disasters and emergencies. Most radio receivers are now standard with FM/DAB+, presenting opportunities to use the newer DAB+ digital technologies to improve First Nations access to relevant and quality services. First Nations free-to-air broadcast analogue FM and DAB+ digital radio services are currently available in Sydney, Melbourne, Brisbane, Perth and Darwin. Where already on-air in an area, DAB+ digital radio can provide affordable access to transmission capacity.

Short term: The Digital Inclusion Roadmap should include, in the short term, the immediate opportunities to access DAB+ digital radio transmission systems in Adelaide, Canberra, Hobart and the Gold Coast for First Nations services, and, following the completion of current trials, consideration of Northern Tasmania and Launceston services.

Medium term: Beyond the existing locations already on-air, the community sector medium-term priority location extension areas currently include:
- o Extending capacity in and adjacent to Sydney and Katoomba, including Wollongong, Newcastle and Gosford.
- o Extending capacity in and adjacent to Melbourne and Geelong, including Bendigo.
- o In Queensland, adjacent to Brisbane and the Gold Coast, including the Sunshine Coast, Lismore/Murwillumbah, as well as Cairns.
- o In Adelaide, enhancing transmission capacity and coverage.

   o In Perth, enhancing transmission capacity and coverage, and to extend southwards across Mandurah and Bunbury, relevant to Noongar Radio services in Perth.
   o In Tasmania, broader Northern Tasmania coverage following the anticipated launch of permanent services in Launceston.

Longer term: The Digital Inclusion Roadmap should provide for longer term opportunities to extend First Nations DAB+ services as they arise, for example when digital radio transmission becomes available in an area due to the extension of national broadcaster, commercial or other community services.

All of the above actions can be undertaken in collaboration with the CBAA's Digital Radio Project, which is focused on the effective extension of DAB+ transmission for community radio and manages service arrangements and delivery.

Recommendation #6
That the Digital Inclusion Roadmap includes short-, medium- and long-term goals for First Nations community radio services to be made available in all capital cities and major metropolitan areas where free-to-air DAB+ digital radio is available and in regional and remote areas as transmission is initiated and becomes available.

3. *It's not just about access to infrastructure – it's about access to quality cultural content*

Strengthening access by strengthening connectivity is obviously an important element of digital inclusion. But there is also a question of "access to what?" Infrastructure that provides increased access to low quality or mass market/overseas content does not address foundational issues, such as preservation of language and cultural knowledge. Nor does infrastructure keep communities informed about health, government services and emergency information, news and local issues from a First Nations perspective, or celebrate First Nations music, art and storytelling.

While the CBAA welcomes the Inclusion Measures as essential to strengthen telecommunications and other technical infrastructure as an important step, their full social and economic value will not be realised if they fail to deliver culturally relevant broadcast services that support community building and engagement. This requires complimentary investment to strengthen First Nations media organisations and content services in all areas.

The development of new digital services could leverage the expertise and skills of existing First Nations Services, with appropriate funding support to ensure that this does not burden already stretched/underfunded services. This could take a collaborative approach, with mentoring or other support or assistance from existing First Nations media organisations in relevant areas, advice from other states and support from other local community radio stations and sector representative organisations FNMA and CBAA. There is also the potential for content and service sharing and distribution. However, given how stretched these organisations already are, there needs to be provision for adequate funding support to fully realise this type of collaborative approach. (Eg. A new Adelaide service could engage Adelaide community stations with First Nations programming and content from CAAMA and other capital city stations. New Canberra/Hobart/Launceston services may seek similar support with Koori Radio Sydney or 3KND Kool 'N' Deadly Melbourne. A Gold Coast station may look to Triple A Brisbane.)

Similarly, projects like First Sounds could be extended to the new areas. First Sounds is a successful collaboration between FNMA's indigiTUBE project and the CBAA's Australian Music Radio Airplay Project (amrap.org.au). Its focus is on developing awareness of regional, remote and metropolitan First Nations artists and the songs and stories they share. The project sources entries from First Nations musicians across the country and distributes them to radio stations for Airplay.

FNMA's Calls to Action #3 and #4 also offer an immediate process for aspects of this to be achieved.

- Action #3 *Expand Live and Local Radio Programs* calls for expansion into First Nations communities without a primary First Nations Radio service, with a goal of providing services to 53% of First Nations people without access to a First Nations radio service.

- Action #4 *Strengthen First Nations News Services* enables positive, balanced and culturally appropriate news with increased local community representation.

Recommendation #7
The Digital Inclusion Roadmap includes goals around First Nations content production, collaboration and distribution, with appropriate funding to ensure the ongoing sustainability of these services, and adopts FNMA's Calls to Action #3 and #4.

4. Understanding and supporting key sources of service provision

The Discussion Paper suggests that

> "In First Nations communities where connectivity is congested or unreliable, traditional television and radio broadcasting reduces the strain on telecommunications infrastructure and provides a secondary source of communication in the event of natural disasters."

We note that broadcasting is a primary – not secondary - source of information for communities with have access to transmission services, by providing free, reliable and universal access during emergencies. The NSW State Emergency Service, for example, lists a portable battery powered radio at the top of its recommended emergency kit. See also the CBAA's report on community media response to emergencies, Beyond Broadcasting, which lists multiple case studies of the essential services provided by broadcasters through crises, including by First Nations media.

First Nations community radio stations and media organisations are the fastest and most responsive conduits for getting information through to First Nations communities in a way that is culturally appropriate, accessible, in-language and timely and should be addressed in the Digital Inclusion Roadmap as a primary source of service provision.

Maintaining and updating ageing broadcast transmission networks

There is currently very limited funding available to repair unforeseen damage caused by natural disasters. There is a pressing need for greater support for community broadcasters to fill the gap between the cost of emergency damage and the amount covered by insurance. While we support the improvement of all connectivity services, it is important that the delivery of transmission-based services, including through digital radio, be regarded as core services for the purposes of the Digital Inclusion Roadmap.

As noted in the CBAA's 2022 response to the *Renewing a Vital Indigenous Voice and Community Asset – The Indigenous Broadcasting and Media Sector Report,* there remains a pressing need for upgrades to ageing and failing technology across the sector. Ageing transmission infrastructure, along with the attendant maintenance and upgrade costs and the need to train and upskill technical personnel, are key challenges facing the sector in regional and remote areas. We support Recommendation 1.11 of the *Initial Report* for the upgrading of broadcasting and digital infrastructure to meet current industry standards and work health and safety requirements.

Recommendation #8
That the Digital Inclusion Roadmap include the actions in Recommendations 1.09. 1.10 and 1.11 of the *Initial Report*.

Simplifying access to VAST

The Discussion Paper goes on to refer to the need to simplify use and access to Viewer Access Satellite Television (VAST), a service that carries community and Indigenous radio services, as well as television.

We refer in this regard to FNMA Call to Action#6 *Upgrade Infrastructure and Digital Networks* which includes, as an action "Provide Repair and Maintenance program through remote housing, for VAST DTH installations in remote communities" with the intended impact that "Remote Indigenous communities have stable and secure access to Direct-to-Home satellite TV and radio services delivered through VAST."

The *Initial Report* mentions ongoing concerns about the age and inoperability of some VAST reception infrastructure and notes the work being addressed in the Future of Broadcasting Working Group to audit the status of transmission and reception equipment, with a focus on remote First Nations communities.

The CBAA supports:

- initiatives to enhance the co-ordination of repair, maintenance or replacement of local VAST reception equipment, and to ensure a pool of ready spares in hubs established in some remote areas, along with basic training on reception equipment set up;
- simplification of set top box activation. All free-to-air radio or television services – national, commercial, community and Indigenous those that receive Government funding to be delivered to the public on VAST should be available in all locations. New set top boxes should be pre-activated with no requirement for location-based activation (whether by phone, internet or otherwise);
- the suggested actions to simplify and improve access to the VAST service as outlined in Recommendation 1.09 of the *Initial Report*; and

- in some remote areas, whether there is an existing broadcast tower in place which is able to be maintained, we support the trialling of rebroadcasting technologies for remote First Nations communities to locally rebroadcast services delivered by VAST, as outlined in Recommendation 1.10 of the *Initial Report*.

We note also that the reviews of the VAST service are heavily focused on the infrastructure aspect and not on the range, diversity or visibility of services available through it. In the context of the Indigenous Digital Inclusion Roadmap, it may be useful to prioritise the availability and visibility of First Nations content and community broadcasting services including a review to assess whether this sufficiently meets the needs of the First Nations communities who receive it, and whether there are opportunities to include other services that would meet these needs.

Recommendation #9
That FNMA Call to Action #6 be adopted in the Digital Inclusion Roadmap.

Recommendation #10
In line with our recommendations above to ensure relevant broadcast services are available to all First Nations communities on VAST, including First Nations community radio services that meet the needs of their First Nations audiences.

Media and broadcasting question
How can First Nations media organisations be supported to skill and retain staff so that talent is not lost to other organisations?

These issues are addressed in:

- FNMA Call to Action #2, which calls for every First Nations media organisation to have the workforce capability and funding to cover operations and meet community obligations. This involves increasing annual funding by $9.5m to $30m, restoring cuts and returning funding to a sustainable level.
- FNMA Call to Action #5, which calls for the implementation of a workforce action plan that includes the expansion of formal and informal training programs to build capacity, enable succession and career pathways and help close the gap on Indigenous employment. This includes reviewing employment funding levels to bring salaries in line with industry awards. ($3.5m).

These actions and measures represent the minimum needed for this part of the sector to be sustainable and are included in FNMA's Submission to this process.

Recommendation #11
That the Digital Inclusion Roadmap adopts FNMA's Calls to Action #2 and #5 including supporting funding increases to meet identified needs.

Media and broadcasting question
What is working well and what could be improved in the relationship between the media and broadcasting sector and the telecommunications sector?

As noted in FNMA's Indigenous Inclusion Submission 2021 (Link) telecommunications service outages in remote communities are common, with impact on a range of uses. FNMA members reported lengthy waits for outages to be resolved and serious consequences, affecting businesses and increasing risk during emergencies. That submission notes:

> "Heat, rain and fire events caused lengthy outages across East Arnhem Land and the Utopia Homelands in the summer of 2020, preventing residents from accessing money, purchasing food or contacting services. The same events also prevented technicians from accessing the communities to resolve the issues. Extensive disruptions to access were also experienced right down the east coast (QLD, NSW and Vic) due to the Black Summer bushfires and some outages due to power failures.[2]

and

> "There is an opportunity for "media organisations to work with telcos to coordinate maintenance for telecommunications services, particularly in remote and regional areas where travel is a significant cost barrier to telcos currently. Media workers could be supported to build capacity and training in technical and IT roles through the Indigenous Skills & Employment Program (ISEP) currently being considered by the

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[2] Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion,* ACCAN & FNMA, March 2021

NIAA, in turn reducing the need for Aboriginal and Torres Strait Islander people to relocate for employment purposes. Through an appropriately funded program, this would present a potential opportunity to grow communications jobs through the provision of IT, technical and training expertise and reduce outages for telecommunication services".

Recommendation #12
That the Digital Inclusion Roadmap explore opportunities for media to work with telecommunications providers on the coordination of service maintenance, in addition to other maintenance measures.

Digital literacy consultation questions
▪ What does digital literacy look like for First Nations people and communities in 2026 and beyond?
▪ How can we strengthen the connectivity literacy of First Nations people and communities, including raising awareness of consumer protections?
▪ How can industry and government products and services be made more inclusive for those who have a low level of English literacy?

FNMA's Call to Action #10 Improve Access to Digital Services includes the following actions:

- Facilitate access to media services and online platforms
- Provide training and mentoring programs in digital literacy
- Training "community digital champions" who live and work in the community and can be at call when there are issues of access and digital literacy
- E-safety programs to accompany the technical rollout of new services, and with content providers (such as Facebook, TikTok etc) taking more responsibility for the provision of unsavoury content.

In principle, anyone from a First Nations community should have access to what they need to navigate digital services, whether through phone, Internet or broadcast platform. First Nations community radio broadcasters and community radio stations more broadly have always been well placed as trusted sources to engage their communities on a range of issues. However, given the funding pressures under which they operate, they need to be properly resourced to provide these services.

CBAA commends the approach of *inDigiMOB* - the FNMA flagship program delivered in partnership with Telstra. This program improves digital literacy among First Nations communities through one-on-one assistance and group workshops delivered in a relevant, sustainable manner and in line with the cultural context of each community. We refer the Department to FNMA's Submission to this consultation for further information.

Other Closing the Gap targets
▪ How can the Advisory Group's roadmap help advocate for progress towards achieving targets under the National Agreement on Closing the Gap?
▪ What role can connectivity and technology play in supporting First Nations culture?
▪ How would digital inclusion support improved access to services?

First Nations community broadcasting services support achievement of many of the Closing the Gap targets. By including measures that enable the sustainability of the sector, we will be making progress toward Closing the Gap.

As acknowledged in the *Initial Report* (pp19-20)

> The First Nations broadcasting and media sector contributes directly to a range of outcomes under Closing the Gap, including Outcome 16 (to achieve a sustained increase in the number and strength of First Nations languages being spoken by 2031) and Outcome 17 (which includes measures relating to number and location of community broadcasting services, content diversity, audience growth and employment in the media sector). It is also a key enabler of additional outcomes relating to health, education and employment.

The Roadmap should seek to ensure the Sustainability Review outcomes deliver on Closing the Gap Priority Reforms through increased funding for the Indigenous Media and Broadcasting Program delivered in a manner that establishes "Formal Partnerships and Shared Decision-Making" and strengthens Community Control. The *Initial Report* further states:

> A strong First Nations broadcasting sector contributes to Priority Reform Two of the National Agreement, which seeks to build the community-controlled sector, whereby there is a strong and sustainable Aboriginal

and Torres Strait Islander community-controlled sector delivering high quality services to meet the needs of Aboriginal and Torres Strait Islander people across the country.

Roadmap 2033 and our sector's contribution to the Sustainability Review fully align with these outcomes and need to be funded to achieve them, as outlined in our earlier recommendations.

Measuring Digital Inclusion and Data Sovereignty

▪ What do meaningful data sharing arrangements between government/industry and communities look like?
▪ What kinds of data would be most useful to you and your organisation or community?

Data about communities improves the ability of community media to work together to serve their complex needs and more broadly supports the achievement of digital inclusion goals. It is clear that currently available data is not adequate and this, in turn, makes it difficult to identify measurable goals for a Digital Inclusion Roadmap. We refer to and support the recommendations 2.2 to 2.5 of the *Initial Report,* (some of which have been adopted in the *Inclusion Measures* aimed at improving data collection).

Historically there has been more data about remote communities than metropolitan or regional, which creates an incomplete picture of national media usage which, in turn, limits the ability to develop a national view of Indigenous digital inclusion. Currently, the data sample for First Nations people in the Australian Digital Inclusion Index appears to be limited to a handful of the 1100 remote communities. This needs to be expanded to understand the needs of First Nations people wherever they live. Similarly, the Closing the Gap Development Plan indicates significant data gaps in this area.

While the *Inclusion Measures* involve the allocation of $6m over 3 years to improve national data collection, it is not clear to what extent this addresses the recommendations of the *Initial Report.* Any gap should be dealt with in the Digital Inclusion Roadmap.

The Strategic Objectives in Roadmap 2033 include:

"Resources allow deep understanding of our communities and measurement of outcomes."

Among other things, the CBAA is undertaking significant work aimed at improving data collection for the sector (the *"CBAA Data project"*). Our dedicated Data Insights Team collects centralised data on community radio, including analyses of listenership and content. We are also working with the ACMA to ensure the comprehensiveness of the Media Diversity Measurement Framework and with projects such as the Public Interest Journalism Initiative's (PIJI) Australian News Data Project to ensure that publicly available data sources accurately reflect the contribution of community broadcasters including First Nations broadcasters. These and other data sources are critical to ensuring that the community sector can also access support through public policies such as the News Media Assistance Program (NewsMAP). Accordingly, the CBAA is seeking, through the Sustainability Review, to ensure that all relevant regulation (such as the News Bargaining Code) includes and properly recognises community broadcasting, including First Nations broadcasting, to ensure that the sector and its data is properly included alongside other sectors as a key contributor to Australian media and the sector can access any support programs.

Recommendation #13
That the Roadmap include national data enabling the measurement of digital inclusion of First Nations people using a representative sample of metropolitan, regional and remote areas and other identified data gaps. Also, First Nations community broadcasters must be eligible under all relevant media regulations, be able access all government media support programs.

Thank you for considering the above recommendations. Please contact CBAA Head of Advocacy and Communications Reece Kinnane (reece.kinnane@cbaa.org.au) about any aspect of this submission.

Jon Bisset, Chief Executive Officer

Indigenous Broadcasting and Media Program (IBMP)

First Nations Community Broadcasters play a central role in telling First Nations stories.

First Nations community broadcasters are community-controlled producers of media that tell stories from First Nations perspective.

They connect First Nations community across the country and are a critical source of information in remote communities. They sustain and strengthen First Nations' diverse culture and language.

They tell stories that foster greater understanding and appreciation for Australia's unique First Nations cultural assets.

Their work is critical to 'closing the gap' between the expectations and outcomes of Indigenous and non-Indigenous Australians.

Strong First Nations community broadcasters enhance self-determination of Aboriginal and Torres Strait Islander communities and close the gap in social and economic outcomes.

In order to close the gap in outcomes, funding targeted for First Nations community broadcasters must increase in line with funding for general community broadcasting services.

Increasing funding Indigenous Broadcasting and Media Program (IBMP) would:

- Close the Gap through strong communities, cultures, and languages, in digital inclusion, training, skills and employment as well as providing a platform for communications fundamental to achieving health and education outcomes.
- Respond to recommendations from the Government's First Nations Digital Inclusion Advisory Group
- Address the priority for First Nations stories to be at the centre of Australian arts and culture as expressed in Australia's cultural policy *Revive*.

Funding for First Nations community broadcasting should be increased to $40 million annually with indexation applied over the forward estimates. This proposal would result in $30 million of operational and employment funding and $10 million to deliver priority reforms requested by First Nations media representatives in First Nations Media Australia's (FNMA) 9 Calls to Action (2018)[3] and an additional action developed to close the gap in digital inclusion.

	2023/24	2024/25	2025/26	2026/27
Total	$21,562,588	$40,000,000	$41,025,641	$42,077,581

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[3] Our Media Matters: 9 Calls for action renewing Australian Government Policy for First Nations Broadcasting and Media, First Nations Media Australia (2018)

Appendix: FNMA 10 Calls to Action

Priority Reforms

First Nations Media Australia's (FNMA) 10 Calls for Action to support the provision of First Nation's community radio services.

FNMA Call to Action/ Goal	Action	Impact	Budget increase ($ per annum)
#1 Reform Broadcasting Act for First Nations Broadcasting	Recognise First Nations broadcasting as a separate category of broadcasting under the Broadcasting Services Act 1992	Achieve self-determination and community control of First Nations community media	$ Nil Under consideration of the DITRCDA Review of Community Broadcasting Sustainability
#2 Increase in Operational and Employment Funding Every FN media organisation has the workforce capability and funding to cover operations and meet community obligations	Funding increase to $30 million per annum, indexed annually for CPI, for operational and employment costs of First Nations broadcasting organisations	Return funding to a sustainable level after a decade of *real* funding cuts. For every dollar invested in First Nations broadcasting and media, $2.87 of cultural, social and economic value is returned Strengthen Communication Provide an effective, trusted and accessible communications medium for First Nations people. Provide a voice for First Nations communities. Strengthen culture and preserve it for future generations through their broadcasts, archiving and film productions. Provide employment through flexible working arrangements in culturally safe environments and providing work opportunities that are aligned with the interests of individuals and communities.	$9.5m
#3 Expand Live and Local Radio Programs Expand service capacity to reach unserved communities	Deliver an innovative First Nations radio broadcasting expansion program into those First Nations communities without a primary First Nations radio service	Provide services to fifty-three percent (53%) of First Nations people without access to a First Nations radio service	$1.5m
#4 Strengthen First Nations News Services Provide positive, balanced and culturally appropriate news services and increase local community representation in news	A targeted funding program to: Provide training and mentoring in journalism to First Nations media workers Support national First Nations news and current affairs services, including support for gathering news from First Nations community journalists Develop a news sharing platform, with editorial staff	Increase the news and current affairs capacity of First Nations broadcasters Enhance collaboration and improve news service quality through sharing news among First Nations broadcasters and media outlets Promote first nations stories and perspectives well through sharing content with mainstream media	$1m
#5 Expand Training and Career Pathway Programs	Implement a workforce action plan including: Expanding formal and informal training programs will build much needed capacity within the sector, enable succession and career pathways, and help close the gap on Indigenous employment Reviewing employment funding levels is needed to bring salaries in line with Industry award rates Enabling a direct employment to increase youth engagement and employment throughout the remote, regional and urban sector Build capacity and skills in specific areas such as management,	More First Nations staff at stations Broaden the range of training significantly to upskill the workforce in higher level duties More First Nations people in senior management roles Address high unemployment rates Increased and improved training and employment opportunities in regional and remote areas Builds the culture and language skills already held by First Nations peoples	$3.5m

	production and coordination (Many of these roles are currently filled by non-Indigenous staff) Support accredited training Provide culturally appropriate employment environments		
#6 Upgrade Infrastructure and Digital Networks Infrastructure and digital network upgrade program is needed to bring First Nations radio services up to industry standard. A number of remote radio studios (Remote Indigenous Broadcasting Services (RIBS)) fail to meet workplace health and standards requirements.	Upgrade broadcasting and digital infrastructure to meet current industry standards and work health and safety requirements Fund broadcasting and digital infrastructure and equipment upgrade program. Fund of a facilities upgrade program Provide R&M program, through remote housing, for VAST DTH installations in remote communities	Remote Indigenous Broadcasting Services (RIBS) to meet workplace health and standards requirements Remote Indigenous communities have stable and secure access to Direct-to-Home satellite TV and radio services delivered through VAST Smart technologies provide for cost–effective network management and monitoring of remote broadcast facilities saving R&M and travel costs for remote Indigenous media organisations	$1m
#7 Recognise First Nations Broadcasters as the Preferred Channel for Government Messaging Solidify First Nations broadcasters and media organisations as the government's provider of choice.	Government to establish a policy identifying First Nations broadcasters and media organisations as the provider of choice for First Nations focused information campaigns, including production, customisation and distribution.	Increased financial sustainability of First Nations media organisations Increased reach, engagement for Government public information campaigns More effective communication with First Nations communities and greater impact through trusted, culturally appropriate channels	$ Nil Under consideration of the DITRCDA Review of Community Broadcasting Sustainability
#8 Preserve Archives Media assets urgently require digitisation to preserve critical archives of Fist Nations culture, storytelling and language	Conserve, preserve and maintain First Nations archives to sustain culture and language and create meaningful employment Maintain a digitisation program, including collection management support, training and digitisation equipment, to enable the digitisation of significant media in the collections	Conserve audio and video recordings from First Nations communities Safeguard content in magnetic tape format in digital archives Maintain culturally important and sensitive content in collections on-country under the custodianship of cultural law keepers	$0.5m
#9 Establish an Annual Content Production Fund Content production is vital to the preservation and maintenance of First Nations language and culture	Establish an annual, competitive First Nations content development fund open only to First Nations broadcasters and media producers	Increase First Nations storytelling and program production Increased production outputs Improved production values Integrated training of First Nations media producers and industry placements	$1m / annum
#10 Improve Access to Digital Services Work collaboratively with the First Nations Digital Inclusion Advisory Group (the Advisory Group) tasked to investigate the digital inclusions issues and address them at national and community level Digital access, mentoring training programs to close the gap on digital inclusion	Facilitate access to media services and online platforms Provide training and mentoring programs in digital literacy Training 'community digital champions' who live and work in the community and can be at call when there are issues of access and digital literacy E-safety programs to accompany the technical rollout of new services, and with content providers (such as Facebook, TikTok, etc) taking more responsibility for the provision unsavoury content	Increased digital inclusion. Improved digital literacy and safety among First Nations communities Increased and improved training and employment opportunities in regional and remote areas	$0.5 / annum (Initial funding proposed for 2024/25 to be reviewed following the Final Report of the Government's Advisory Group)
Total			**$18.5M**

Further Info: Calls for Action | First Nations Media Australia