Indigenous Evaluation Strategy

● ● ● ●

Productivity Commission Issues Paper

Response of First Nations Media Australia

August 2019

This submission is made by First Nations Media Australia. Some members may make individual submissions in which case the First Nations Media Australia submission should not be taken to displace those submissions.

About First Nations Media Australia

First Nations Media Australia is the peak body for Indigenous media and communications. It was founded in 2001 as the peak body for remote Indigenous media and communications. In late 2016 it transitioned to the national peak body for First Nations broadcasting, media and communications.

Up to 105 Remote Indigenous Broadcasting Services (RIBS), 33 additional licensed retransmission sites across Australia, 8 Remote Indigenous Media Organisations (RIMOs) and 28 urban and regional First Nations radio services are eligible for representation by First Nations Media Australia.

About the First Nations broadcasting and media sector

First Nations broadcasters are not-for-profit community organisations providing a primary and essential service to their communities. Collectively, they reach nearly 50% of the Australian Aboriginal and Torres Strait Islander population. First Nations broadcasters and media producers also connect non-Indigenous communities with Aboriginal and Torres Strait Islander people and culture, developing greater understanding and building stronger relationships.

The scope of the First Nations media sector includes:

- **Radio**: Over 230 radio broadcast sites coordinated by 35 licensed, community-owned, not-for-profit organisations. These radio services able to reach around 320,000 First Nations people, including around 100,000 very hard to reach people in remote Indigenous communities, or approximately 47% of the First Nations population. They broadcast live shows, plus interviews, radio documentaries, news, emergency information, community events, government and other messaging within community broadcasting guidelines.
- **Video & film production**: Production of culture and language-based content for broadcast & online distribution.

- **TV**: National (NITV) and regional (ICTV) TV services; local TV services (Goolarri TV at Broome, Larrakia TV at Darwin). ICTV satellite TV service reaches 240,000 remote households.
- **News production**: National, regional and local news and current affairs services for broadcast, as well as print and online news media, including:
  - National Indigenous Radio Service (NIRS) and its National Indigenous News and Weekly News-in-Review
  - Central Australian Aboriginal Media Association's news service, including its Strong Voices program
  - Koori Radio's news and current affairs programming
  - NITV News and Living Black
  - Print media including Koori Mail and National Indigenous Times
- **Print** and **Online:** A national newspaper (Koori Mail) alongside a strong web presence of journalistic sites such as IndigenousX, National Indigenous Times and indigiTUBE, a dedicated online platform showcasing aggregated content complimented by an app streaming 20 radio services. First Nations media organisations have a strong social media following and publish content online daily.

The First Nations broadcasting sector delivers programming in over 20 languages national, including the first language of many people in remote communities. In the remote context, it is the most reliable and ubiquitous radio and media service available to audiences. The sector is based in local communities and employs local people as broadcasters and media producers. It is a local and trusted voice as evidenced in the 2017 Social Return on Investment analysis of First Nations broadcasters which demonstrated an almost 3:1 return on investment in social outcomes.[1] The sector reaches significant audience share with 80% of people in remote Indigenous communities being regular listeners to radio services.[2]

---

[1] https://www.firstnationsmedia.org.au/about/social-value-study-2017
[2] https://www.firstnationsmedia.org.au/projects/indigenous-communications-and-media-survey-2016

In this Response

Contact Details

Daniel Featherstone
General Manager
Level 2/70 Elder Street, Alice Springs NT 0870
PO Box 2731. Alice Springs NT 0871
Ph 08 8952 6465
F   08 8992 9669

W   www.firstnationsmedia.org.au

1. Introduction

First Nations Media Australia welcomes the opportunity to comment on the Productivity Commission's Indigenous Evaluation Strategy project and share our industry's experiences with various evaluation methods. This submission does not respond to all consultation questions posed in the Issues Paper. Rather, it provides broad comment on the establishment of a principles-based framework for the evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people, the priorities for evaluation from our perspective and supports a co-designed approach to evaluation processes. Our area of expertise relates to the First Nations media industry. Therefore, this response focuses on media sector experiences and does not attempt to comment on broader areas of government investment affecting the lives of Aboriginal and Torres Strait Islander people such as health or early childhood development.

First Nations Media Australia is a member of the Coalition of Peaks and as such, a signatory to the *Partnership Agreement on Closing the Gap 2019-2029*. We are pleased to see the formal partnership between Government and the National Coalition of Aboriginal and Torres Strait Islander Peak Organisations acknowledged within the Issues Paper and view the Joint Council between COAG and the Coalition of Peaks as an excellent means of co-designing accountability and evaluation processes moving forward.

2. Evaluation of First Nations Media Investment

The Australia Government has provided funding support to the First Nations broadcasting sector through a range of programs managed by a variety of government departments since 1987. While oversight of programs relating to the funding of First Nations media organisations has transitioned with the Government of the day, the amount of funding available to the sector has remained relatively static for the last decade at approximately $21m per annum, including approximately $6m per annum in employment funding previously administered by Department of Communication and the Arts through the National Jobs Package (NJP).

Over the past twenty years many reports and discussion papers have been produced evaluating the effectiveness of government investment in the Indigenous Broadcasting Program and the impact of First Nations media in the community. The most notable of these reports include:

- **Out of the Silent Land – Eric Wilmot, Task Force Chairman (1984)**

The purpose of this task force was to consider the development of policies and strategies for Aboriginal broadcasting. In recommending the provision of broadcasting services in remote communities the policy objectives were aimed at the development of policies to enable broadcasting and related telecommunication services for all First Nations people with particular focus on remote communities who did not have access. The report's 55 recommendations were largely focussed on the needs of remote Indigenous people and included and resulted in the beginning of the remote Indigenous broadcasting sector.

- **Aboriginal and Torres Strait Islander Broadcasting Policy Review – Sue Paton, Department of Aboriginal Affairs (1989)**

This report proposed the establishment of a discrete Indigenous broadcasting sector with increased resourcing, as well as the creation of Aboriginal community radio licenses. Unfortunately, the Department of Transport and Communications opposed the report, insisting that Aboriginal and Torres Strait Islanders should work within existing structures. This held back the development of an Indigenous managed broadcasting industry.

- **Discussion Paper on Indigenous Broadcasting Policy – Department of Aboriginal Affairs (1991)**

This paper encouraged funding for Indigenous media in recognition of its social functions. The paper acknowledged the recommendations of the 1991 Royal Commission into Aboriginal Deaths in Custody and the 1991 Report of the National Inquiry into Racist Violence both of which encouraged funding for Aboriginal controlled media for self-representation, self-empowerment and challenging negative stereotypes in mainstream media.

- **Evaluation of broadcasting and communications sub-program – Aboriginal and Torres Strait Islander Commission, Office of Evaluation and Audit (1992)**

This report provided an evaluation of the Broadcasting for Remote Aboriginal Communities Scheme (BRACS) based on responses to questionnaires and interviews with ATSIC regional staff. It stresses a need for national media policies and strategies and a co-ordination of funding at national and regional level; priorities and strategies needed for development and support of BRACS.

- **Aboriginal and Torres Strait Islander broadcasting policy review report and draft policy statement – Aboriginal and Torres Strait Islander Commission, Infrastructure Branch (1993)**

ATSIC released the first Indigenous broadcasting policy with 5 key areas: equity; cultural restoration, preservation and growth; efficiency of communication; employment; and enhance self-image.

- **National Report on the Broadcasting for Remote Aboriginal Communities Scheme – Neil Turner (1998)**

This report examined the existing status and future needs of the Broadcasting for Remote Aboriginal Communities Scheme. It described local radio and television broadcast facilities in 101 remote Aboriginal and Islander communities around Australia and made a series of recommendations related to licensing, funding, management and training.

- **Digital Dreaming: a national review of Indigenous media and communications – Indigenous Management Australia for the Aboriginal and Torres Strait Islander Commission (1999)**

The Digital Dreaming report recommended new policy based on the following key principles:

  - First level of service.
  - Investment in long-term sustainability.
  - Staged strategic planning.
  - Whole of organisation approach.
  - Business and marketing plans.
  - Convergence of content production, delivery systems and service providers.
  - Government department interaction with Indigenous media.
  - Commercial diversification.
  - Economic independence.

Unfortunately, this significant report was largely ignored by government policy makers and funding agencies, leaving the industry to continue to struggle with outdated policy amidst the rapidly changing technological environment. Instead of allocating additional resources, funding under IBP actually dropped over the following two years.

- **Broadcasting Report no 11 – Productivity Commission (2000)**

The inquiry stemmed from the Government's commitment under the Competition Principles Agreement to review legislation for its anti-competitive effects. The inquiry was about advising the Government on practical courses of action to improve competition, efficiency and the interests of consumers in broadcasting services. The Government asked the Commission to pay particular attention to balancing the social, cultural and economic dimensions of the public interest and have due regard to the phenomenon of technological convergence to the extent that it may impact upon broadcasting markets.

- **Indigenous Broadcasting Program Review – Department of Communications, Information Technology and the Arts (2006)**

This review acknowledged that Indigenous Broadcasting Program funding levels had remained relatively unchanged since the late 1990s and that demand had increased to more than double the allocation. However, rather than support this

increased activity, the review reduced the scope of activity to radio broadcasting only, discontinuing funding for television production and other media forms. Responsibility for all video-related costs was diverted by IBP to the new $48.5m NITV program.

- **Review of National Indigenous Television – Hugh Watson Consultancy for the Department of Environment and the Arts (2009)**

This review examined the first three years of funding for NITV, including the first two years of broadcasting. In the period under review, NITV had gone from a fledgling start-up to a successful medium size organisation operating a nationally-distributed Indigenous television service broadcasting an average of approximately 22 hours of programming per day and noted this major achievement.

- **Review of the Australian Government Investment in the Indigenous Broadcasting and Media Sector – Neville Stevens, Chairperson, Office of the Arts, Department of Prime Minister and Cabinet (2010)**

Stevens noted that "*The review of the Australian Government's investment in the Indigenous broadcasting and media sector has confirmed the many strengths of the sector. It is staffed by passionate and committed people, it provides significant benefits to local communities and it has an important role to play in national agendas such as Closing the Gap. The implementation of the review's recommendations would improve cohesiveness and unity among the sector, enable it to move confidently into a multi-media world and engage younger people. It would also develop improved training and governance capacity within Indigenous broadcasting and media organisations.*"

The Review made 39 recommendations under the headings of:

- Improving the administration of the sector
- New Indigenous broadcasting licences
- Building on the Indigenous Broadcasting Program
- The future of Indigenous television
- More effective government communications
- Better governance
- Integrating the reporting and performance framework
- Building individual capacity and sector capability through employment and training
- Enhancing Indigenous content on mainstream media
- Preparing for future technology

Of those 39 recommendations, only one was implemented (moving oversight of funding to our sector to the Department of Communications) but was retracted when the Indigenous Advancement Strategy was introduced.

- **Report of the review of operational partnerships in the remote Indigenous broadcasting sector – Hugh Watson for the Department of Prime Minister & Cabinet (2014)**

This was an internal report analysing the working relationships between Remote Indigenous Media Services, Remote Indigenous Media Organisations (RIMO) and local shires in order to understand the operational partnerships and determine their efficiency, effectiveness and equity of the current operational models in use. The review acknowledged substantial variations in the operational models used in different regions and recommended a RIMO-directed funded model which was partially adopted by the PMC.

- **More than radio – a community asset: Social Return on Investment analyses of Indigenous Broadcasting Services – Social Ventures Australia for the Department of Prime Minister and Cabinet (2017)**

The SROI study examined the cultural, social and economic impact of funding as well as gauging the value of IBS to the communities they serve, beyond their role as broadcasters. Specifically, the SROI was designed to:

- assist the Commonwealth in working with Indigenous broadcasting organisations to support them in developing the services they offer and in delivering those services more sustainably
- help ensure IAS programs are delivering for local communities, and provide confidence the Commonwealth's investment is well targeted, and
- provide Indigenous broadcasters with evidence of their benefit and services beyond broadcasting.

The analysis was based on three broadcasters: PAW Media at Yuendumu NT (remote), Umeewarra at Port Augusta SA (regional) and Koori Radio at Redfern NSW (urban). Overall the analysis showed a $2.87 in cultural, social and economic value returned for each dollar invested.

These reports and reviews cover and produce very similar topics and outcomes. Together they represent just a small portion of research conducted on Government investment in the First Nations broadcasting and media industry. Further to this sample is a plethora of academic research, briefings, presentations and issues papers that center on the evaluation of First Nations media activities.

While this set of evaluation materials has supported ongoing Federal government investment in operational funding to the industry, the vast majority of recommendations emerging from this set of evaluations has been consistently ignored by policy-makers. Or, in just a few cases, adopted briefly and then regressed by a subsequent incoming Government. Our members have spent countless hours contributing to evaluation programs to demonstrate their value with limited outcome.

It's worth noting that the majority of this research has been conducted about a similar set of underfunded organisations who experience 'survey fatigue' and strain on organizational capacity in meeting evaluation objectives. While there is a broad understanding of the need for accountability and evaluation programs, re-stating the rationale for the Indigenous Broadcasting Program every couple of

years can become repetitive and draining. We encourage the Productivity Commission to seek efficiencies in data collection and evaluation through a centralized repository for information that is available to the public and has a closed area for inter-departmental information sharing.

From an industry perspective, this set of research has largely served to provide independent confirmation of the feedback First Nations broadcasters receive every day from their communities about their value. The evaluation has not been developed in such a way that it provides useful data to participants to help meet their own sustainability objectives. With the exception of the Social Return on Investment study conducted by Social Ventures Australia in 2017 which provided useful case studies to three organisations, the majority of evaluation research has been so focused on Government objectives that it hasn't taken into account the way sharing the research data might be used by industry to measure its own outcomes and support alternate funding activities. In this study, it was our experience that a significant amount of time and resources was dedicated to providing cultural competency guidance to a non-Indigenous organisation, resulting in capacity building for the evaluation consultants, but the data collected was not shared with First Nations Media Australia to undertake its own data analysis and support industry development outcomes.

The 2014 Report of the review of operational partnerships in the remote Indigenous broadcasting sector by Hugh Watson provides a better example of collaborative research. First Nations Media Australia (then known as the Indigenous Remote Communications Association) was contracted to collect data for the review through undertaking an equipment and licensing audit. This proved useful information for our members and our industry and is an example of an evaluation project with successful outcomes for both government and service provider.

The recommendations in this submission seek to rectify this oversight by including First Nations organisations in the design of any evaluation approach and sharing in the outcomes of the evaluation, incorporating principles of self-determination and collaborative information sharing.

3. Principles

First Nations Media Australia encourages the Productivity Commission to include the principles of self-determination and collaboration in the Indigenous Evaluation Strategy.

The best outcomes of evaluation practices occur when participants can share in the outcomes of the evaluation process. Universities operating under ethical research guidelines often do this well, as did Social Ventures Australia as previously mentioned. There are private, non-Indigenous research companies that can evaluate the content and audience outcomes relating to First Nations media on a fee-for-service basis, however they are often prohibitively expensive and

inexperienced in working with First Nations communities which negatively impacts the evaluation results.

Moving forward, the Productivity Commission has an opportunity to develop collaborative evaluation systems and practices that benefit both Government and Aboriginal and Torres Strait Islander people through evaluating programs in partnership with First Nations organisations and communities, so that Aboriginal and Torres Strait Islander people can use information gathered about them for their own purposes. New Zealand provides a good example of this type of data sovereignty through Te Mana Raraunga, the Maori Data Sovereignty Network.

4. Priorities

First Nations Media Australia acknowledges there are a range of competing and complementary priorities emerging, each of which interact to affect the lives of Aboriginal and Torres Strait Islander people overall. Digital inclusion and digital literacy is an emerging need that now underpins equitable access to services for Aboriginal and Torres Strait Islander people. However available data on telecommunications infrastructure, internet and mobile phone access and digital literacy rates is sporadic and varies significantly between jurisdictions. We recommend the inclusion of digital inclusion rates as part of the Indigenous Evaluation Strategy.

When the National Indigenous Reform Agreement (NIRA) was approved by COAG in 2008 only 64% of Australian households had internet access (a marked increase from 16% in 1998)[3]. The internet was yet to become integral to accessing information. In the ten years since the NIRA was developed, Government and non-government services have increasingly moved online.[4] Mobile banking emerged in the 2010s, online lodgment of tax returns began in 2013, followed by the launch of MyGov in July 2014 to manage Medicare, Centrelink and other government service interactions. Today, digital connectivity is required to access banking, health, education, libraries, news, entertainment, shopping and other services that underpin connection to the broader economy. Telecommunications access *is* an essential service and digital inclusion is itself considered a human right. This is of particular importance for people living in communities where there is limited direct access to services. Without affordable digital inclusion, it becomes increasingly difficult for Aboriginal and Torres Strait Islander people to live, learn, work, establish businesses and access essential services throughout Australia.

For these reasons, digital inclusion is recognised as one of the key social justice challenges facing policy makers and communities worldwide. It is about using technology as a channel to improve skills, to enhance quality of life, to drive education, access employment opportunities and promote social and economic

---

[3] Australian Bureau of Statistics, Australian Social Trends 2008: http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4102.0Chapter10002008
[4] Government services have been transitioning to online delivery under the Digital Transformation Strategy

wellbeing.[5] In 2019, digital inclusion equates to social inclusion of Aboriginal and Torres Strait Islander people in Australia, and is essential to Closing the Gap.

With remote Indigenous people still the most digitally excluded population group in Australia, none of the current target areas address the impediments to accessing affordable communications and information services in terms of infrastructure, capacity and service reach. These factors each contribute to a 'digital gap' for First Nations Australians.

Digital inclusion can be measured through multiple lenses to track progress; accessibility, affordability and digital ability. Accessibility is already monitored through the rollout of infrastructure, census data and telecommunications data. This type of data is available through each jurisdiction and provides a baseline for monitoring progress against the access component of digital inclusion. For example, the Northern Territory has identified 21 remote communities with no mobile phone service, 33 with no fixed internet service and 37 connected to unreliable or unsuitable satellite services[6]. It would be extremely useful to have similar information available in other jurisdictions.

Telstra, RMIT University and the Centre for Social Impact at Swinburne University partners with Roy Morgan Research to monitor digital inclusion through the Digital Inclusion Index Report. The third of these reports was published in August 2018. It identifies a widening gap for digital inclusion between high and low income households and a low, but improving, rate of digital inclusion for Indigenous Australians.[7] Digital ability, as well as access, is identified as a key area requiring focus from policy makers. First Nations Media Australia recommends the Productivity Commission build on such research and includes digital inclusion and digital literacy is its considerations when developing priority areas for the Indigenous Evaluation Strategy.

First Nations Media Australia notes a high level of Government expenditure on mainstream services for Aboriginal and Torres Strait Islander people (82%). We suggest this figure should be monitored in relation to the amount of funding support provided to Indigenous specific services and services delivered by First Nations community-controlled organisations as a component of the overall Indigenous Evaluation Strategy framework.

---

[5] Digital Inclusion Index, https://digitalinclusionindex.org.au/about/about-digital-inclusion/

[6] Northern Territory Government, submission to the Regional Telecommunications Review

[7] Digital Inclusion Index, August 2018, https://digitalinclusionindex.org.au/wp-content/uploads/2018/08/Australian-digital-inclusion-index-2018.pdf

5. Approach

As stated in our introduction, First Nations Media Australia is supportive of an evaluation approach that includes Aboriginal and Torres Strait Islander people, through community-controlled peak bodies informed by our members, in the design of evaluation methods and the collection and analysis of data. That said, this work needs to be appropriately funded. It should not be expected that First Nations organisations can absorb participation in evaluation processes within their current operations, or that First Nations organisations should carry the additional burden of providing cultural competency support to non-Indigenous consultants and researchers without reasonable compensation for that expertise.

One successful example of this process was provided in the summary of Evaluation of First Nations Media Investment (Section 2) relating to the collection of data in collaboration with Hugh Watson. A different scenario, but similarly collaborative process took place when First Nations Media Australia commissioned McNair YellowSquares (a non-Indigenous company) to undertake a remote audience survey. McNair YellowSquares brought significant experience in audience surveying and data analysis. However standard phone survey techniques were inappropriate for remote areas due to a lack of phone connectivity and language barriers. In partnership, First Nations Media Australia and McNair YellowSquares partnered to train and employ local researchers. With oversight from McNair YellowSquares, those researchers conducted surveys in community hubs (such as outside the shop, in parks and other gathering spaces) in local languages and reported their findings via iPads in a standardized manner. This method significantly improved survey participation rates and provided a culturally and linguistically appropriate means of involvement in data collection for audiences and researchers, while meeting the overall objectives of the evaluation.

A collaborative approach to data collection should be taken to minimize the additional work expected of Aboriginal and Torres Strait Islander people who are disproportionately burdened with the continual provision of information about multiple aspects of their lives. The Productivity Commission should seek to mitigate this through a more focused approach to data collection and the sharing of data to the greatest extent that privacy boundaries will allow.

State and Territory jurisdictions should be included in the design and collection of evaluation data to reduce overlap in surveying activities and increase the amount of data available at a national level. While the research requirements vary across jurisdictions, jurisdictional participation in a more standardised and nationally structured approach to the Indigenous Evaluation Strategy would meet the principles of collaborative information sharing. We strongly encourage jurisdictions to work toward a national evaluation framework through the Joint Council on Closing the Gap.

There is a range of evidence demonstrating a correlation between individual connection with culture and successful program outcomes in a variety of fields. The Issues Paper identifies the need to recognize culture, lore and practice in evaluating what works in First Nations communities. We strongly support this view.

6. Other comments

The Issues Paper poses a question on page 5 about the best way to address mainstream programs in the Indigenous Evaluation Strategy. While it is understood that a comparison to mainstream programs can provide baseline information from which to evaluate some programs, media is an example where cross-referencing mainstream programs would be inappropriate and ineffective. The objectives of mainstream media primarily relate to audience reach and revenue generation whereas the objectives of First Nations media relate to the maintenance of culture and languages, appropriate provision of information, employment and a range of social inclusion outcomes. In our view, addressing mainstream programs in the Indigenous Evaluation Strategy should be approached on a case-by-case basis.

We note the lack of progress on most of the Closing the Gap targets and suggest that this can be attributed in part to a lack of communication strategy associated with the NIRA and the Closing the Gap agenda of 2008. This resulted in a lack of broad understanding of the objectives of the Closing the Gap targets and how they relate to the daily lives of Aboriginal and Torres Strait Islander people. We hope that a more consultative approach to the Closing the Gap Refresh currently underway will address this in a manner that gives Aboriginal and Torres Strait Islander people ownership and agency within the Closing the Gap Framework, supported by a structured communications strategy to explain the objectives and encourage participation.

The Issues Paper refers to the Indigenous Advancement Strategy through which most of our members receive funding support. We wish to comment on two programs mentioned:

1. The Community Development Program (CDP)

The report notes a variety of views in evaluation, which reflects our experience of this program. Working with members across the country, feedback to First Nations Media Australia on the effectiveness of the CDP has been similarly varied, which we believe reflects significant inconsistency in the implementation of the program. We have observed differences between national and local representatives in their interpretation of the CDP parameters, and variance in understanding of the program between regions. It is unclear, from the Issues Paper, whether such variety of implementation was considered in the evaluation of this program.

2. Indigenous Procurement Policy (IPP)

The IPP appears to provide an example of an initiative with good outcomes overall. First Nations Media Australia is working with Supply Nation representatives to support our members to access this program. The evaluation referred to in the Issues Paper is primarily financial and therefore relatively easily tracked from a government spend perspective. However, the evaluation of this program does not appear to consider the impact government procurement contracts have had on Indigenous businesses in terms of growth or social outcomes. This might be an area where comparison to mainstream equivalents could be valuable.

7. Summary of comments

In general, First Nations Media agrees with the main components of the Indigenous Evaluation Strategy outlined in the Issues Paper. We encourage the Productivity Commission to take a partner-based approach to evaluation systems, incorporating principles of self-determination, collaboration and data sovereignty to minimize the burden of evaluation on Aboriginal and Torres Strait Islander people and to allow for shared use of information gathered. This should include data collected by jurisdictions in a national framework approach to evaluation through the Joint Council. Digital inclusion is a current gap in evaluation systems that should be a priority to address in the Indigenous Evaluation Strategy.