

4 June 2020

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SUBMISSION TO SELECT COMMITTEE ON COVID-19

The Community Broadcasting Association of Australia (CBAA) – the peak body and national representative organisation for over 450 community radio broadcasters across Australia – welcomes the opportunity to participate in the Select Committee's inquiry into the Australian Government's response to the COVID-19 pandemic.

Community radio plays a vital role in informing communities underserved by commercial and public broadcasters – including First Nations Australians, communities in regional and remote Australia, culturally and linguistically diverse communities, faith-based communities, youth and seniors' communities, the LGBTIQ+ community, and people with a disability. As such, community radio is a critical platform for ensuring the equal access rights of all Australians in Government information and advertising campaigns are upheld.

Along with many Australians, community radio services have faced significant challenges due to the COVID-19 pandemic which has impacted significantly on broadcasting resources, staffing and volunteers, and revenue sources in sponsorship, donations and fundraising. Many community radio stations have struggled to maintain operations.

Throughout the pandemic, the Government's COVID-19 national health campaign has been critical in reducing the risks to Australians by helping them to make informed decisions and take up health recommendations. Though the campaign has overwhelmingly relied on commercial and public media, the community broadcasting sector has played an important role in the campaign due to the sector's unique listenership and ability to deliver community and culturally specific information.

There is evidence to suggest that the Federal Government underutilises the community broadcasting sector in its health and other advertising campaigns, including its COVID-19 campaign. With a more fulsome inclusion of the community radio sector in the Federal Government's health and information campaigns, not only will the messaging be amplified to otherwise underserved communities, but it would also provide targeted financial support to local community stations.

This inquiry provides an opportunity to better understand the community broadcasting sector's engagement in the Government's COVID-19 campaign and any roadblocks to be overcome to ensure community radio stations can be better utilised in delivering Government health and information campaigns in the future.

Our submission focuses on:

- Community radio's unique role and listenership across Australia;
- Challenges faced by community radio stations during COVID-19 and the sector's response;
- The community radio sector's involvement in the Government's COVID-19 campaign;

- Issues preventing the community radio sector from being fully utilised in Government campaigns; and
- Recommendations to ensure the community radio sector can be fully utilised in future Government campaigns.

Community radio's unique role and listenership across Australia

Community radio has a meaningful contribution to make in the Government's public health and information campaigns related to COVID-19 and other issues due to the sector's large and unique listenership, and its specific programming.

There are approximately 5.8 million listeners across Australia tuning in to community radio stations each week (29% of the population). Of these listeners, over 1.5 million do not listen to any commercial radio and, further, 918,000 listen exclusively to community radio (that is, they listen to community radio but not commercial radio or ABC/SBS radio).¹ Community radio listeners are more likely to identify as Aboriginal or Torres Strait Islander, identify as LGBTI, have a disability or reading difficulty, speak a language other than English at home and/or hold a religious faith.² We have attached to the end of this submission a fact sheet with more information on the sector's listenership from the most recent National Listener Survey conducted by McNair yellowSquares.³

76 per cent of community radio stations are located in regional or remote parts of the country and in many cases are the only local media source.⁴ In these regions, community radio stations are, by their very nature, hyperlocal conduits for information and news. In our most recent Community Radio National Listener Survey, 65% of respondents in non-metro regions said that their top reason for listening to community radio was for 'local information and local news'.⁵ In many regional areas financial pressures faced by commercial news outlets has seen the closure of local newspapers and newsrooms. The community broadcasting sector has a long history of delivering local news, local community information and public interest journalism to regional and remote communities across Australia and is well-placed to continue providing and enhancing this offering.

The sector is not only well-positioned to provide Government health and information campaigns in regional and rural communities, but also in a community-appropriate way, as stations are apt at serving diverse communities such as First Nations, culturally and linguistically diverse, people with a print disability, youth and seniors. For many non-English speaking communities, community radio is the only source of information and news available in their language and delivered in a culturally relevant way. First Nations community radio stations and media organisations are also 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. There are roughly 60 First Nations media organisations operating in over 235 communities across Australia, producing media content in more than 25 languages.⁶

Importantly, community radio stations act as catalysts for community dialogue and resilience through tough times, helping to combat social isolation and, importantly, connecting people to the critical services and information they need. As Australia continues to stop the spread of COVID-19, especially in more vulnerable communities and regions of the nation, community radio has never been more important.

¹ Community Broadcasting Association of Australia (2019). National Listener Survey Australia Fact Sheet Wave #2 December 2019 [online] Available at: www.cbaa.org.au/sites/default/files/media/McNair%20yellowSquares%20-%20NLS%20Fact%20Sheet%20-%20Australia%20-%202019%20-%20Wave%20%232%20-%20190101.pdf

² Ibid

³ Also available online here: <https://www.cbaa.org.au/broadcasters/get-data-national-listener-survey-station-census/national-listener-survey-fact-sheets>

⁴ Community Broadcasting Association of Australia (2019), State of the Sector Report [online] Available at: <https://www.cbaa.org.au/article/state-community-radio-sector-report>

⁵ Community Broadcasting Association of Australia (2019). National Listener Survey Non-Metro Fact Sheet Wave #2 December 2019 [online] Available at: <https://www.cbaa.org.au/sites/default/files/media/McNair%20yellowSquares%20-%20NLS%20Fact%20Sheet%20-%20Non-Metro%20-%202019%20-%20Wave%20%232%20-%20190101.pdf>

⁶ First Nations Media Australia, online: <https://firstnationsmedia.org.au/our-media>

Challenges faced by community radio stations during COVID-19 and the sector's response

Along with many Australians, community radio services have faced, and continue to face, significant challenges due to the COVID-19 pandemic.

The severity of the impact of COVID-19 has accelerated pressure on local community radio stations to find ways to deliver key broadcast services efficiently and economically, while transitioning to an entirely or partially remote content-production and broadcast model. It is impacting significantly on broadcasting resources, staffing and volunteers, and revenue sources in sponsorship, donations and fundraising.

The economic impact of the pandemic as well as the necessary social distancing measures have had serious and ongoing impacts on the community radio sector and have left many stations struggling to maintain operations. Station revenues, which are particularly reliant on sponsorship from local small businesses and the music and arts industries, are down in many cases over 80%. Annual fundraising drives – usually held May through to August – are unlikely to generate the needed revenue amid the pandemic's economic impact. Unfortunately, many stations have laid off staff ineligible for the Government's support measures and many volunteer workers, particularly in vulnerable groups, are understandably staying home.

The Community Broadcasting Foundation (CBF) was set up in the 1980s to distribute Federal Government funding to the community broadcasting sector via the Government's Community Broadcasting Program. In response to COVID-19, the CBAA, along with all the other Sector Representative Organisations and the CBF, have been consulting widely with stations across the country, as well as with the Department of Infrastructure, Transport, Regional Development and Communications. Together, the sector responded immediately by establishing a Crisis Taskforce to understand the challenges faced; consider the best way the sector can respond using our available resources; and identify where gaps exist and where Government assistance is required. Measures taken by the sector to date include:

- Providing an automatic six-month extension on reporting requirements for all current CBF Development & Operations and Content grants.
- Allowing CBF grant applicants time to re-evaluate and recast their applications to accord with operation under crisis conditions.
- Establishing a new COVID-19 Crisis Fund with existing sector funds and pursuing contributions from Government and the private sector to provide stations with targeted financial support to maintain operations. Our intention is to build on the initial \$2.2 million investment – towards the \$8 million target – through government and philanthropic support.
- Establishing a CBF COVID-19 Quick Response Grant Fund to ensure that volunteer-only stations can apply for a grant up to \$2,000 to assist with maintaining operations under social distancing requirements.
- Securing a partnership with the Judith Neilson Institute to increase the amount of news reaching Australians via community radio. This has allowed the CBAA's National Radio News service to be free for all member stations for the next six months. The number of stations broadcasting National Radio News across the country has increased to 118 (up from 83) with an estimated audience of 1.7m listeners per week.
- Supporting the Australian music industry through a new Australian Music Radio show – *Australian Music is Bloody Great* – broadcast across the CBAA's Community Radio Network (the sector's national content distribution service).
- Sharing Department of Health Community Service Announcements through the CBAA's Community Radio Network, including in First Nations languages and a variety of languages other than English.

The CBAA wrote to the Minister for Communications, Cyber Safety and the Arts on 17 April to provide an update on the actions the sector was taking and request early Commonwealth support for a number of these measures. Since writing, the CBAA has engaged with the Department of Infrastructure, Transport, Regional Development and Communications to further refine the initial support framework and initiatives where potential investment and collaboration with Government will be most impactful for the sector in the immediate future. These include:

1. A call on the Government to provide a one-off \$5 million contribution to the CBF's COVID-19 Crisis Fund to ensure that community broadcasters can sustain their operations and services to communities throughout the pandemic and in the recovery phase.
2. An offer to collaborate with the Government to ensure greater use of community radio for Government health and information campaigns – we expand on this issue and initiative below.

The community radio sector's involvement in the Government's COVID-19 campaign

There is a clear role to be played by community radio in the Government's public health and information campaigns related to COVID-19 due to the sector's unique listenership, ability to develop and share in language messaging and central role played in First Nations and remote communities (where community radio is often the only media source).

CBAA research has found that in the first week of the Commonwealth's public COVID-19 campaign (roughly the 16-26 March), 81% of the surveyed sample of community radio stations were playing Government health information, with 66% of these not being provided any funding to do so.

Between 16 March and 7 May (7.5 weeks), 151 community radio station broadcasts were monitored by the CBAA. Of these, 112 were broadcasting the Government health messages at any time in that period, 74.17% of the sample. Across these 112 stations, over 30,000 plays of the health messages were broadcast within the period, culminating in a potential audience of approximately 1,578,000 listeners each week (actual listenership is likely to be higher due to stations outside the survey scope).

We understand the Federal Government's COVID-19 campaign spend with community radio has been focused on First Nations audiences, culturally and linguistically diverse communities and people with a print disability. States and territory governments have spent portions of their health campaign budgets through community radio to target multilingual communities and communities with a disability.

With 1.5 million Australians listening to community radio but not listening to any commercial radio and a further 918,000 listening exclusively to community radio (that is, they listen to community radio but not commercial radio or ABC/SBS radio), we believe there is a strong case to be made for broadening the Government's engagement with community radio stations in its COVID-19 health and information campaigns. This would ensure important messaging is amplified to otherwise underserved communities – particularly in regional and remote parts of the country – and that the equal access rights of all Australians in Government information and advertising campaigns are upheld.

An added benefit of expanding the Government's engagement with community broadcasters would be to mitigate the impacts of the pandemic on the sector itself. Many stations are struggling to maintain operations. Despite this challenge, the community radio sector is committed to keeping its listenership informed and up to date with the Government's latest health information, and in most instances has been doing so without any formal arrangements with Government in place. It is our understanding that the Christian community broadcasting sector (which represents a significant portion of community radio listenership) and JOY (Australia's only LGBTQIA+ station) have not received any Government media spend to broadcast public health and information campaigns.

In 1989 the community broadcasting sector established a national representative scheme to buy media on the sector's behalf. This organisation, Spots and Space, has a long tradition of working with Government to purchase Government campaigns and efficiently distribute campaign material and

payment to the sector. Spots and Space, as the sector's largest media-buying agency, is able to mediate effectively between Government and hundreds of community radio stations to ensure a dynamic solution to reaching our sector's diverse audiences.

Issues preventing the community radio sector from being fully utilised in Government campaigns

Community radio stations are effectively, though not explicitly, excluded from full participation in Government health and information campaigns due to the media buying process that Government departments are required to follow.

Government agencies are required to place major advertising campaigns through a central buying process – the Central Advertising System (CAS) – managed through the Department of Finance. A contracted agency – currently Universal McCann (UM) – is contracted by the Department as the master media agency responsible for the placement of all advertising under the CAS.

The Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities came into effect from 1 February 2015.⁷ They provide a framework for the conduct of all publicly funded information and advertising campaigns. Here, a stated principle governing the use of public funds for all government information and advertising campaigns is that members of the public have equal rights to access comprehensive information about government policies, programs and services which affect their entitlements, rights and obligations.

The Guidelines also state that for advertising campaigns of \$250,000 or more “[t]he Independent Communications Committee will consider the proposed campaign and provide a report to the Chief Executive on compliance with Principles 1,2,3 and 4 of the Guidelines. Following consideration of the reports on campaign advertising compliance, the Chief Executive will certify that the campaign complies with the Guidelines and relevant Government policies. The Chief Executive will give the certification to the relevant Minister who may launch the campaign or approve its launch.”

A key feature of Principle 2 (and one Chief Executives must certify campaigns against) is that “Special attention **should** be paid to communicating with any information disadvantaged individuals or groups identified as being within the target audience. Particular attention **should** be paid to meeting the information needs of Indigenous Australians, the rural community and those for whom English is not a convenient language in which to receive information.”

Within the Guidelines, where the word ‘must’ is used, it signals that there is a mandatory requirement. As such, there is no mandatory requirement for Government (or its master media agency) to fully consider disadvantaged individuals many of whom are underserved by commercial broadcasters – including First Nations Australians, communities in regional and remote Australia, culturally and linguistically diverse communities, faith-based communities, youth and seniors’ communities, the LGBTIQA+ community; and people with a disability.

Furthermore, the current system, whilst designed to rely on evidence driven advertising placements, relies on incomplete data by only referencing commercial radio survey data which fails to prompt for, or categorise, community radio station listenership. This means the master media agencies cannot and do not fully consider utilising community radio for Government campaigns. This is particularly pertinent to regional community radio stations where the availability of other campaign revenue is low and, in many cases, community radio stations have a greater market share than in metropolitan markets.

⁷ Available via the Australian Government's Department of Finance online: www.finance.gov.au/government/advertising/guidelines-information-advertising-campaigns-non-corporate-commonwealth-entities

Recommendations to ensure the community radio sector can be fully utilised in future Government campaigns

There is evidence to suggest that the Federal Government underutilises the community broadcasting sector in its health and other advertising campaigns, including its COVID-19 campaign. With a more fulsome inclusion of the community radio sector in the Federal Government's health and information campaigns, not only will the messaging be amplified to otherwise underserved communities, but it would also provide targeted financial support to local community stations.

The CBAA recommends that the Government's Guidelines on Information and Advertising Campaigns by non-corporate Commonwealth entities be updated to include a mandatory requirement for Government to consider disadvantaged individuals or groups identified within the target audience. Further, we recommend a positive obligation be included in the Guidelines for the community radio sector to be considered on its merits at the time when advertising/sponsorship is placed.

The CBAA also recommends that the Government ensure relevant sector data is utilised by its master media agency. This will mean that, as part of the campaign process, the contribution community radio can make in ensuring full and appropriate coverage of the population is properly considered. Such an approach would underpin optimal assessment and performance metrics in measuring the efficient, effective and accountable delivery of the Government's advertising campaigns.

Together, these policy recommendations would safeguard the equal access rights of all Australians in Government information and advertising campaigns and ensure that community radio stations can be fully utilised in delivering Government health and information campaigns in the future.

We have engaged with both the Department of Health and Universal McCann (the current master media agency) on this issue proposing a collaborative project to analyse the sector's engagement in the Government's health campaigns to date and any roadblocks, facilitate engagement with our sector and increase our sector's engagement with the Department (and other relevant areas of Government) to ensure the community sector is better utilised in future Government health campaigns.

As the peak body for the community broadcasting sector, and an active participant in research, policy and planning, the CBAA is committed to further sharing our ideas, experience and knowledge with this Committee.

We thank you for opening this important inquiry and welcome any opportunity to appear before the Committee or assist in other ways in its reporting.

Kind regards,



Jon Bisset
Chief Executive Officer