



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

24 March 2023

To the Manager
Content and Platform Projects Section
Australian Communications and Media Authority

A New Framework for Measuring Media Diversity in Australia - Consultation

We appreciate the chance to offer our input on this crucial consultation. CBAA strongly supports the ACMA's efforts to establish a framework for measuring the Australian news market. We believe that pluralism is an essential component of a healthy media ecosystem, and a more detailed and nuanced evidence base for policy-making is necessary to promote the production and dissemination of a broad range of information and viewpoints across the media market.

CBAA is broadly supportive of the approach taken in the proposed model, centred around measures of diversity and localism, subject to further consideration of the proposed indicators and consideration of refinements suggested in this submission.

Community broadcasting is a key contributor to each of the proposed new measurement indicators in the new framework: source diversity, content diversity, consumption diversity, level of connection (to a locality), level of originality and level of civic journalism.

It is important that the contribution of the community broadcasting sector is accurately captured in the new framework. To ensure this, the scope and definition of some of the draft measures will need to be reframed. Specifically, the CBAA is interested in ensuring that:

- news and information produced by community broadcasters is included in the framework;
- definitions of news outlets and journalism are broad enough to include all newsgathering and production delivered by organisations operating under formal codes of practice, and is not limited by an unduly narrow definition of "professional news";
- The terminology "professional" is not used. It is undefined and is unnecessary. Some may interpret it to exclude news production by unpaid journalists, journalists without a certain standard of qualification (eg. a university-level Journalism degree) or broadcasters that do journalism as part of their role.
- viewpoint diversity is measured as a critical element, including workforce diversity;
- trust measures are incorporated in any assessment of impact;
- given the intent of the model to form an evidence based for policy making, the scope, data gathering and new research be framed as broadly as possible, to enable a full understanding of the Australian media market;
- any new research contribution required of media outlets is feasible and adequately resourced;
- and
- community broadcasting organisations are included in ongoing consultation related to the refinement and implementation of a new framework.

Community broadcasting and the Australian news market

The Community Broadcasting Association of Australia (CBAA) is the peak body and national representative association for 450+ not-for-profit community radio broadcasters across Australia, delivering 500+ radio services on AM, FM and DAB+ platforms as well as streaming, podcasts and catch-up radio online.

As recognised in the new National Cultural Policy *Revive: a place for every story, a story for every place*, community broadcasting is a vital part of the Australian media landscape, providing a voice for underrepresented and underserved communities and as a key contributor to culture, inclusiveness and social cohesion. Community broadcasting is also recognised for its key role in emergency resilience, local engagement and as a platform for original Australian content. The policy acknowledges the need for Government action to “*increase support for community broadcasting to deliver local news, tell local stories, and provide a platform for diverse voices...*”¹ Support for news delivery through community broadcasting should include full and proper recognition of the news and information produced by community broadcasters.

Around 5 million listeners tune in to community radio each week across Australia, representing around 25 per cent per cent of Australians aged 15 years and older.

80per cent of stations are in non-metropolitan areas of Australia (48per cent regional/32per cent remote). 26per cent of the regional/remote population (1.7 million people) listen to community radio each week.

Produced by more than 18,500 volunteers and 833 employees, the community broadcasting sector is a critical platform for voices that reflect the diversity of the Australian community, including First Nations people, culturally and linguistically diverse communities, people with disability, youth, seniors, LGBTQIA+ and faith-based communities.

News and information is the number one ranked reason listeners tune in to community radio. 56 per cent of weekly listeners name news and information as their main reason for listening to community radio. In regional areas, this figure rises to more than 66per cent.²

Community radio has particular importance in regional markets. For example, in the Sunshine Coast market, a community radio station is the number 1 ranked of all radio (including commercial and public) stations by listenership and the population is 50 per cent more likely to listen to community radio compared to the national population.

The news and information service supported by community broadcasters is a critical support for local communities managing local emergencies and natural disasters.

As recognised in the Royal Commission into National Natural Disaster Arrangements community radio stations “*offer an important source of information during emergencies, particularly for Australians living in remote communities*” and have been able to *provide “information to isolated and rural communities when they are unable to receive landline or mobile phone communication, use the internet or watch television”*.³ For numerous case studies on emergency news, see CBAA’s Beyond Broadcasting Report⁴.

The CBAA supports a national Community Radio Network enabling content sharing across stations, with 147 stations across Australia subscribed to the service. This includes National Radio News service, which has a strong focus on supporting regional stations and is produced by CBAA in partnership with Charles Sturt University in Bathurst. The service produces 84 national and 25 state-based bulletins per week including stories produced by a full-time journalist working in the Parliament House press gallery. 94 community stations subscribe to its stories, and its content reaches 1.69 million listeners weekly. CBAA is currently leading a project to support stations to share news stories and build and follow a collaborative, pan-Australian Community News agenda. Commencing with an initial group of 15 stations, the CBAA intends to grow news collaborations between community broadcasters.

Traditional measures of media diversity, which were focused on ownership and control, and defined for specific regulatory purposes, have failed to provide an accurate picture of the Australian media

¹ Australia’s new cultural policy, *Revive: a place for every story, a story for every place* (2023), p89

² McANair YellowSquares Community Radio Listener Survey Wave 2 2022

³ <https://naturaldisaster.royalcommission.gov.au>

⁴ https://www.cbaa.org.au/sites/default/files/media/CBAA_BeyondBroadcasting.pdf

market. The proposed framework has the potential to enable a more nuanced policy approach to all sectors of the Australian media, including the community broadcasting sector.

CBAA Response to Questions raised in the Consultation Paper

Our responses to the specific questions in the paper are as follows:

Scope of the news measurement framework

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1. *Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking levels of media diversity in Australia?*
 2. *Do you consider the framework, as outlined in the paper, would be an effective tool in measuring and tracking the health of local news in Australia?*
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Yes, broadly, subject to the specific concerns and suggestions below.

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3. *Do you agree with the proposed scope of the news market?*
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As noted in the 2023 Consultation Paper, ACMA's December 2020 paper proposed restricting the scope of examination of the news market to "professional" sources of news that show a level of connection to Australia. This is broadly defined to include "media outlets" but exclude sources of participatory journalism or "organisations without sufficient editorial independence" like advocacy groups.

CBAA agrees that the media definition should be expanded beyond traditional media to include digital news sites, podcasts and the social media presence of media outlets. Given that part of the impetus for this work has been the significant shifts in audience behaviours away from more traditional platforms, it is critical that these trends are measured and understood in order for this measure to be effective.

Our main concern is that the definition of sources not be unduly restrictive and exclude legitimate sources of news, including as produced by community broadcasters.

In the 2020 ACMA paper it was suggested that a professional news organisation "*may be defined as any outlet that:*

- *maintains independence from those it covers*
- *demonstrates a commitment to accuracy, transparency and journalistic ethics*
- *is devoted primarily to reporting and publishing timely, originally produced news or informed opinion about people, places, issues and events."*

While the first two criteria would apply to community broadcasting news, the third would exclude most broadcasters who provide a range of content and are not "*devoted primarily*" to publishing news. This is critically important as the scope of this definition flows through to metrics and methodologies in the News measurement indicators (Appendix 1 of the 2023 Consultation Paper). Further the terminology "professional" must not be used. It is undefined and is unnecessary. Some may interpret it to exclude news production by unpaid journalists that otherwise complies with accepted standards of journalistic ethics and news production.

For the purposes of formulating policy that protects and ensures the sustainability of outlets that operate within a more the formalised structure (e.g. a broadcasting licence or a news and information distribution business) is it essential that the definition of news outlet be generally consistent across all usage, and broad enough to ensure it includes quality news services that are not necessarily provided by paid journalists in the context of a newsroom.

Examples of CBAA member station news activities

Byron Bay - Bay FM

Bay FM 99.9 produces daily local bulletins, broadcasting the Northern Rivers News three times a day. The news team originates stories from local sources including local governments, police, emergency responders, local politicians and community groups across the Northern Rivers with a strong focus on the Byron Shire. The news team includes a paid part-time executive producer and volunteers trained on the job. EP Mia Armitage has received three Community Radio Awards awards for Excellence in Journalism. In 2022 Community Newsroom, the weekly news and current affairs show she produces, was awarded Excellence for News and Current Affairs Programming for its three-hour emergency live broadcast on the Northern Rivers' floods and landslides, delivered for free when telecommunications were down across the region, leaving some people stranded in urgent situations with no media service besides Bay FM 99.9 FM.

Sydney – Hope Media 103.2

Hope is Sydney's Christian community radio station operated by a non-profit parent organisation Hope Media. In 2019 just prior to the Pandemic, Hope realised a long-standing ambition to start a newsroom, having previously taken a relay service from a commercial provider. Listener research continually shows that the provision of relevant news is highly rated by the community served by Hope which has a cumulative weekly listenership of over 400,000. In its first three years of operation, it has covered NSW bushfires and floods and was essential in delivering accurate, reliable reporting about Covid 19 to its community. Hope News and Sport airs hourly bulletins with half-hourly updates between 6am and 6pm Monday to Friday and hourly bulletins 9am to 2pm on weekends. Under the leadership of Head of News Anita Savage, Hope News employs three full time and two casual journalists based in Sydney to originate news in-house and supplement their bulletins with Canberra-based political reporting from the Community Radio Network's National Radio News. Audio bulletins are available online and the team produces unique digital content of relevance to the Christian community on its digital platforms.

Perth – RTR FM

RTR has broadcast from downtown Perth for 46 years. It produces local bulletins on weekdays between 6am and 12 noon, compiled by a mix of journalists and volunteers and tailored for local interests, along with a 2-hour daily morning news magazine show *On the Record*. Station Manager Simon Miraudo notes that their key editorial question for each story is local interest and audience needs, as the national news agenda is not always of equal interest to their listeners. Issues covered include destruction of the regions' aboriginal art, the stories of local artists and voices cut off from the rest of the nation during the pandemic lockdowns and since, stories highlighting injustice and inequality for Aboriginal and Torres Strait Islander people.

Brisbane - 4ZZZ

4ZZZ produces local news stories produced by station journalists and supplements in-house activity by sourcing the best local news content from a variety of sources, including press releases and other media. The Zedlines bulletin airs three times weekly between 8-11am on Tuesday, Thursday and Friday; Brisbane Line airs four times weekly for one hour; and Pineapple Rebellion, which covers issues being discussed in all levels of government from a local perspective.

The station's editorial outlook places local issues first which guides the news sourced from other outlets. Station-generated content is developed from a range of local sources including community groups, Brisbane Council, local NGOs and community social media. The capacity for 4ZZZ to originate news fluctuates throughout the week, based on the availability of journalists. For example, the Brisbane Line program can take up to half of its content from *The Wire*, a current affairs program produced collaboratively by a group of other community broadcasters (including 4ZZZ) and aired on the CBAA's Community Radio Network.

As the case studies demonstrate, community radio stations distribute important news and information of great significance to local audiences. Those that do not run formal newsrooms could potentially be excluded from measurement if the news market is defined too prescriptively. The above stations, for example, are not currently tracked, on the Public Interest Journalism Initiative Australian News Index and related news maps.

Every community broadcasting licensee is bound by registered Codes of Practice developed by the sector and CBAA in conjunction with ACMA, which incorporate ethical standards around news and current affairs including Codes 3.6 and 3.7 of the *Community Radio Broadcasting Codes of Practice*.

Community Radio Broadcasting Codes of Practice

- 3.6 News, current affairs (including news updates and promotions), documentaries, feature programs and interviews shall:
- a. provide access to views not adequately represented by other broadcasting sectors,
 - b. present factual material accurately and ensure that reasonable efforts are made to correct substantial errors of fact as quickly as possible,
 - c. clearly distinguish factual material from commentary and analysis,
 - d. present news in such a way that it does not create public panic or unnecessary distress to listeners, and
 - e. represent viewpoints fairly without having a misleading emphasis, editing out of context or withholding relevant and available material.
- 3.7 Community broadcasters play a vital role in broadcasting emergency information. Community radio stations with the ability to offer emergency broadcasts will:
- a. have procedures in place to enable appropriate local emergency broadcasts,
 - b. liaise with appropriate emergency and essential service organisations, and
 - c. ensure the accuracy of emergency information.

For these reasons, and to ensure news diversity is properly captured, CBAA argues that the appropriate parameters to define a “news outlet” should be set by reference to whether the news outlet adheres to formal Codes of Practice that meet accepted journalistic standards.

As this issue is central to a shared understanding of the news diversity framework, CBAA supports further work towards agreed definitions of “news” and “news outlet” which can then be used consistently through the framework and its underlying measures. CBAA also does not agree with the use of the subjective terminology ‘professional’ in the definition as this may be too limiting and exclude legitimate and valuable sources of news for Australians. The metrics and methodology used should be careful to include;

- journalists that may not be paid;
- people that perform journalism tasks and functions as part of a broader role (ie. Broadcasters that do journalism);
- people that do journalism to a standard regardless of their professional qualifications, whether they are untrained, trained on the job, or trained through vocational or tertiary education.

Community Radio Journalism Training

The Community Media Training Organisation (RTO ID 91800) is the key community broadcasting Registered Training Organisation and trains over 1200 community broadcasters at 160 stations each year. 30% of its students complete training as community journalists annually.

4. *Do you agree with the proposed key measures of diversity and localism?*

CBAA supports the broad measurement of diversity and localism as a way to understand the Australian news media market. and that a mix of source, content and exposure diversity will provide, at a minimum, a more nuanced picture of media diversity than has previously been available.

We note the suggestion at page 37 of the 2020 ACMA paper that localities below 10,000 people be out of scope. This would exclude a significant number of regional, remote and First Nations news outlets from content analysis and not serve the aim of identifying diversity in local communications nor support policy-making to address regional news deserts.

5. *Would you recommend any additions or changes to the proposed framework and/or its underlying key indicators?*

For the reasons outlined above, we believe that the following amendments to the news measurement indicators in Appendix A would improve the framework:

News infrastructure

1. **Availability of sources:** This indicator refers to “professional news outlets” without defining the terminology’s meaning. For the reasons outlined above, CBAA supports a single and clear definition of news outlets by reference to the organisation’s independence and operation within accepted standards, as outlined above. Any news map used as part of the methodology should be guided by this definition. As outlined in our case studies, the definition needs to be broad enough to capture all news made available to audiences and not just from organisations “devoted primarily” to news production. News produced outside such organisations may be significant or influential to audiences and it is useful to have supporting research to understand the broad news market. The methodology listed in Appendix A includes “Crowd-source missing information via online newsmap” and CBAA believes this should be consistent with news definitions used for other parts of the framework, or appropriately referenced.
2. **Availability of journalists:** This measure also references professional news outlets and would need to take into account the above issues. While counting journalists and editors and other production staff is useful, it is important to consider important news production and dissemination beyond what might be seen as traditional newsrooms and understanding the news workforce may involve broader measures. It would also be useful to build understanding of the diversity of the journalist/news producing workforce. ABS data may not assist to identify journalist that have other work functions. Community broadcasters may consider themselves broadcasters primarily, although some will also do journalism.
3. **Number of owners:** CBAA agrees that this cannot be considered a standalone measure of diversity and that community and other media need to be included in any overarching diversity measure. In addition, the framing question for Indicator 3 assumes that privately owned media are the “most influential sources of news” and this part of the question should be qualified or removed. Influence surveys regularly show that public, community and other media sources exercise significant influence, and non-traditional media are growing in their influence on audiences. A broader measure of media providers may be useful, with owned media as a subset.

Indicator 3 refers to the number of ‘owners’, intending to demonstrate concentration. This needs to be more nuanced to reflect types of ownership that provide appropriate balance in response to the impacts of highly concentrated private media ownership. Co-operative community ownership, not-for-profit, and public media (such as ABC and SBS) driven by a purpose defined in charter or constitution should be recognised for the nature of their contribution to news media diversity even though they do not fit narrow conceptions of private ownership. Private ownership concentration, and its sometimes pernicious impact on news media diversity, should continue to be measured.

News output

4. **Range of topics.** The proposed metrics “count of articles” and count of “hard” articles, distinguish ‘hard’ from ‘soft’ news. This type of definition may not be useful in this context. As above this should refer to “count of stories” rather than articles.

5. **Range of viewpoints:** This measure aims to identify content diversity and civic journalism, which CBAA welcomes and regards as a critical part of the framework. The metric utilised should be much broader than the number of views in an article as proposed. This measure should consider the balance of stories and views across content and programming over a period of time. As above, the methodology should refer to “stories” not “articles”.

Workforce diversity and participation deserves a prominent position in the framework. Community broadcasting, by its nature, provides a platform to amplify diverse voices and interests, including First Nations, culturally and linguistically diverse groups, geographic diversity, LGBTQI+, faith-based diversity (such as that provided by some Christian community stations which offer news services) and people with disability. Increasing media workforce diversity is important for fair and just news media reporting and to address systemic marginalisation of people with disability, First Nations people and culturally and linguistically diverse Australians. Measuring workforce diversity will be important to ensuring the stories of all Australians are reflected in news media production and to ensure policy supports efforts to enhance media workforce diversity. For example, the CBAA and RPHA (the Radio Reading Network) are partnering on a new Disability Media Project to improve representation in the media for people with disability by producing content on disability made by people with disability in support of the goals of Australian Government’s 2021 – 2031 Disability Strategy. The CBAA commends First Nations Media Australia’s (FNMA) submission to gain further understanding of the importance of measuring workforce diversity for reconciliation outcomes and strategic efforts to support the National Agreement on Closing the Gap.

6. **Local relevance** is increasingly important for the reasons outlined in the 2020 ACMA paper. CBAA supports the collection of data on the coverage of local news stories, but again the language of the metrics should be more platform neutral and refer to “stories” rather than “articles”. The agreed methodology refers to collecting samples from “local media outlets”. As outlined earlier, the framework would benefit from consistent language and definitions so that measurements of different indicators can be cross-referenced.
7. **Consumption:** This indicator should be refocussed to understand more comprehensively how Australians are consuming news. In tracking consumption diversity, it is not clear why “most consumed” sources would be preferred over a broader analysis of consumption. In an increasingly fragmented media environment, it is useful to understand the range of potential sources consumed, not just those consumed most often (Audience size and frequency of consumption). Similarly, the metric of “most popular” sources will only tell part of the story, so it is not clear why this metric is limited to a more narrow, industry focused metric. If the methodology is a consumer survey, it should track consumer preferences as offered, rather than confining them. CBAA supports the combination of use and frequency data, as a way to build a more nuanced understanding of consumption. Again, the metrics only refer to commercial ratings and circulation data, and this should be adjusted to account for all platforms, not just print and commercial broadcasts. News consumption in languages other than English should also be measured including strong consideration for news in Aboriginal and Torres Straight Islander language.
8. **Impact:** While seeking to measure the “most impactful” sources of news, this indicator uses as its metric the “most popular” news sources. This will skew measurement away from appreciation of localised stories and away from understanding regional news markets that are in crisis. While audience size is a key metric, popularity alone may not correlate to impact or influence, especially in regional and remote areas where small numbers might equal a strong local market share. It also does not take into account, for example, news breaking by smaller outlets that is picked up subsequently by larger outlets. CBAA also strongly supports the inclusion of research around trust, as suggested in the methodology.

Case Study: Community broadcasting news-breaking

The value of locally-based and community-integrated journalism is demonstrated by community broadcaster, Ngaarda Media, which delivered award-winning coverage of four-year-old Cleo Smith's kidnapping and gave a voice to wrongly accused First Nations man, Terrance Flowers (who used the name Terrance Kelly on Facebook).

After four-year-old Cleo Smith was taken from a campsite in Carnarvon Western Australia in late 2021, Channel 7 wrongly identified Mr Flowers as the alleged abductor by widely broadcasting a photograph of him across several news programs. The alleged abductor's name was spelled Terence Kelly, not Terrance, and the commercial broadcaster had not verified that the photo they sourced from social media was in fact an image of the other man. As a result, Mr Flowers suffered serious harassment online and locally.

Ngaarda Media was the first organisation to identify and report on the erroneous identification and did the first interview with Flowers when hospitalised as a result of panic attacks he experienced as a result of being wrongly linked to the disappearance of Cleo Smith.

Ngaarda Media's team and journalist Tangiora Hinaki demonstrated best practice skills in independently researching, investigating, and reporting on a story responsibly offering the new and correct information to audiences. Ms Hinaki said: "We broke this story. We led the national news and were proud to see our story on *Media Watch*".

Ngaarda Media is not currently captured on PIJI's Australian News Index and related news map.

Reference: [Media Watch 8 November 2021](#)

6. *Do you have views on whether the framework adequately considers the impact of social media and other digital platforms on media diversity, or if new or alternative measurement approaches are required?*

To the extent that it is useful for policy makers to understand all existing and emerging media platforms and consumption patterns, CBAA believes the framework should be capturing all forms of news. As outlined above, the language in the metrics should be along the lines of "news stories" rather than "articles" to ensure the framework captures all forms of news media dissemination.

Existing data and research

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10. *Is there any additional third-party research or data that could be relevant to help inform final design and/or implementation of framework?*
11. *Should the ACMA seek to incorporate and build on existing third-party data when implementing its framework?*
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The impact of community broadcasting is sometimes overlooked or underestimated in the market due to gaps in commercial and other measurement of media markets.

The Community Radio Listener Survey is conducted by McNair Yellow Squares using a sample of 18,000 Australians in two ways per year, in line with international ISO Standard best practice research methodology. It is the only instrument in the Australian media market that consistently measures core regional radio markets and asks about listening of every available radio station in a market (vs other research which only asks about paid commercial subscriber organisations).

This research has given CBAA the ability to demonstrate the importance and relevance of community radio in regional markets where other measurement is not granular or detailed enough to do so. As some community radio stations lack the resources or capability to undertake detailed measurement individually, CBAA provides this as a service to its members. The organisation has done significant work to build the sector's data availability, data analysis capability and impact measurement. As more community radio stations become part of our cloud-based news sharing environment we will grow our database of news producers, broadcasters and consumption at a station level and content level, enabling better tracking of production and distribution of news stories across our member networks. Subject to resourcing, it may be possible in future to provide this information to the ACMA in a manner that supports the diversity framework.

CBAA supports the use of validated third party research and information to inform the evidence base for the media diversity framework.

We welcome the work being undertaken by the Public Interest Journalism Initiative and are currently reviewing the information captured on the PIJI news index to ensure that it is accurate and up to date and captures all community broadcasters that meet their criteria.

PIJI's separate categorisation of community news organisations referred to as a note in their eligibility criteria is problematic in the way it uses the word community to classify the excluded organisations that do not meet professional news standards. As evidenced above, a significant number of news-producing community broadcasters do meet news standards under PIJI's definition of news.

As outlined elsewhere, it would be helpful to have a consistent definition of news and news outlets for the purpose of the measurement framework. If data for the new framework is to be collected from various sources, it will be important to ensure that the parameters, definitions and methodology are comparable and align as far as possible with the framework, or that such data is appropriately qualified when being incorporated into any policy analysis. CBAA suggests that further consultation on the definition (or subsets) is needed.

9. Restrictions or barriers to acquisition, sharing or use of proposed third-party research or data?

CBAA would welcome an opportunity to share our data and analysis with the ACMA for the purposes of the framework, providing that the data and analysis is accurately understood and that consultation occurs to ensure it is used appropriately. From the perspective of CBAA's members, our concerns are on the grounds of equity and that providing additional data is properly resourced, as required to achieve the goals of the framework. Non-profit news services should not be excluded from measurement due to resource limitations.

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10. *What are the most significant outstanding data gaps, and how should these be prioritised?*
 11. *Do you have views on potential pilot projects that ACMA could do in 2023? ACMA's ongoing role in news measurement?*
 12. *Are there opportunities for the ACMA to collaborate with research organisations to help implement the news measurement framework?*
 13. *Are there any current or emerging technologies that could be considered by the ACMA to assist in content or to help implement other aspects of the news measurement framework?*
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As outlined above, CBAA supports research which provides a more accurate picture of audience engagement, trust and standpoint diversity, while recognising the limitations of some research methods.

We support broader research around how audiences consume news, what they trust, and what they perceive as important news for them, and media trends, as this gives policy makers and media organisations the ability to support appropriate policy interventions.

The CBAA partners with universities and research organisations to understand and enhance the news capability of community broadcasters and would consider partnering with the ACMA and other organisations for pilot research project or research collaborations.

Conclusion

CBAA reiterate our broad support of the approach taken in the proposed model, centred around measures of diversity and localism, subject to further consideration of the proposed indicators and consideration of refinements suggested in this submission.

CBAA notes submissions made to this consultation by community media organisations the Local and Independent News Association (LINA), First Nations Media Australia (FNMA), Christian Media and Arts Australia (CMAA) and National Ethnic and Multicultural Broadcasters Council (NEMBC). The Community Media Training Organisation (CMTO) supports this submission. Community broadcasting organisations, as well as the Local and Independent News Association should be included in ongoing consultation related to the refinement and implementation of a news framework.

We look forward to seeing the next iteration of the framework and to assisting the ACMA to finalise a new Framework for Measuring Media Diversity in Australia.

To discuss this submission, please do not hesitate to contact, CBAA's Head of Advocacy and Communications, Reece Kinnane at reece.kinnane@cbaa.org.au or via 02 9318 9621.

Best regards,



Jon Bisset
Chief Executive Officer