



*A new framework for
measuring
media diversity in Australia*
– ACMA consultation paper



Response from
First Nations Media Australia



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FNMA acknowledges the traditional custodians of the lands on which we work. We pay respect to Elders past, present and emerging.

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 replace those

[First Nations Media Australia](#) (FNMA) is the peak body for the First Nations media and communications industry. Our purpose is empowering Australia's First Nations people through our culturally connected media industry. As of January 2023, FNMA's membership includes 36 organisations and 40 individuals who work in or alongside the community-controlled media industry as broadcasters, freelance journalists, photographers, filmmakers, and allies. First Nations Media Australia supports and amplifies the First Nations media sector and its objectives. Our activities include resource and policy development, skills development, networking events and meetings, content-sharing, promotion, regular communications, annual awards, research activities and representation.

As part of its industry leadership role, FNMA seeks to ensure First Nations communities have access to information required to make informed decisions, including access to public resources such as broadcast spectrum necessary to provide timely and relevant information to First Nations communities.

The crossover of infrastructure, digital literacy, and access to information between telecommunications and media is significant. Therefore, First Nations Media Australia advocates for the digital inclusion and connectivity needs of all Aboriginal and Torres Strait Islander people.

The scope of the First Nations media sector includes:

- **Television:** National free-to-air (NITV); satellite delivered narrowcast (ICTV) TV services; local narrowcast TV services (Goolarri TV at Broome, ICTV in Alice Springs and Broome and Larrakia TV at Darwin). The ICTV satellite TV service reaches 371,846 smartcards nation-wide, not including terrestrial services in Alice Springs and Broome.
- **Video & film production:** Production of culture and language-based content for broadcast & online distribution.
- **Print and Online:** A national newspaper (Koori Mail) alongside a strong web presence of journalistic sites such as IndigenousX, National Indigenous Times.
- First Nations media organisations have a strong **social media** following and publish content online daily.
- **Radio:** Over 230 radio broadcast sites coordinated by 35 licensed, community-owned, not-for-profit organisations. These radio services reach around 320,000 First Nations people, including around 100,000 very hard to reach people in remote Indigenous communities, or approximately 48% of the First Nations population. Radio services are prevented from providing a primary radio service to all Aboriginal and Torres Strait Islander peoples due to a lack of funding and spectrum availability. Established stations broadcast live shows, plus interviews, radio documentaries, news, emergency information, community events, government, and other messaging within community broadcasting guidelines through these platforms:

- 157 stations broadcasting on FM.
- 4 stations broadcasting on AM.
- 13 broadcasting via VAST satellite, in addition to FM services.
- 5 metropolitan services broadcasting via DAB+, in addition to FM services in Sydney, Melbourne, Perth, Brisbane and Darwin.
- Almost all offer online streaming via a dedicated station website.
- Many offer on-demand content either through the station’s own website, or Soundcloud or podcast sites.
- 26 stations can be streamed via the indigiTUBE website and app. Some stations also have their own application or use the TuneIn or iHeartRadio apps to reach audiences.
- These channels offer a wide range of programming, including news and current affairs reporting from a First Nations perspective, in over 25 Indigenous languages nationally, including the first language of many people in remote communities.

The sector reaches significant audience share with 91% of people in remote First Nations communities being regular listeners to radio services and watching ICTV at least once per month.¹ In the remote context, First Nations media is the most reliable and ubiquitous radio and media service available to audiences. First Nations broadcasting returns an average \$2.87 in social outcomes for every \$1 invested, with many organisations returning a rate much higher than this nearly 3:1 average ratio.² The communications sector provides enabling services to support opportunities and outcomes in service sectors, such as health and education, and promotes inclusiveness and participation.³



About this submission

First Nations Media Australia has based the responses provided in this submission on past research into and consultation with first media organisation members about Aboriginal and Torres Strait Islander people’s experiences of diversity, inclusion and representation in the media. This submission does not represent the views or concerns of all Aboriginal and Torres Strait Islander people; nor should it be taken to replace any specific community-based submission. It was prepared by FMNA Research Policy Officer, Dr Robin Gregory, and Senior Policy Officer, Dr Eleanor Hogan.

¹ McNair Ingenuity Research and Indigenous Remote Communications Association, *Remote Indigenous Communication and Media Survey*. Report prepared for Indigenous Remote Communications Association, 2016.

² Social Ventures Australia, *More Than Radio – a community asset: Social Return on Investment Analyses of Indigenous Broadcasting Services*, 2017.

³ Department of Communications and the Arts, *The Communications Sector: recent trends and developments*, Bureau of Communications Research, Commonwealth Government, Canberra, October 2016.



Introduction

First Nations Media Australia welcomes the Australian Communications and Media Authority (the ACMA) and the Australian government's commitment to encouraging media diversity and to ensuring the development of a robust evidence base monitoring levels of diversity across the Australian news landscape through the creation of a news measurement framework. We welcome ACMA's renewed focus on this project, and the opportunity to provide a written response to the consultation paper, *A new framework for measuring media diversity in Australia*, regarding both the construction and suitability of the proposed Framework (hereafter the 'Framework') for assessing diversity and localism across a range of key focus areas within the contemporary Australian news market.

This submission seeks to address the key issues and themes relevant to the First Nations media sector in ensuring diversity of representation in content and news sources, as well as within workforce participation and the production of news media and content. In view of this, the submission only provides comments on issues and responses to questions where relevant.

FNMA commends the ACMA's commitment to designing an instrument to monitor media diversity and localism in the Australian news landscape. We recommend that ACMA consider broadening the scope of the news market within the Framework in ways that capture the operation of First Nations media organisations as the primary providers of news and current affairs to Aboriginal and Torres Strait Islander peoples, as well as the diverse multidisciplinary nature of media work within the First Nations media sector. Consequently, FNMA urges the inclusion of three additional measures within the Framework:

- **Media workforce diversity**
- **First Nations representation/participation**
- **Accessibility**

We also suggest that the ACMA ensure the measures included in the Framework are consistent with other Commonwealth Government policy instruments, such as *Closing the Gap*, *Revive: National Cultural Policy* and *Better Connectivity Plan for Regional and Rural Australia*. The National Agreement on Closing the Gap commits governments to fulfilling various outcomes, some of which are of key relevance to the policy objectives of the ACMA's news measurement Framework, specifically:

- Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing. (Outcome 16)

- Aboriginal and Torres Strait Islander people have access to information and services enabling participation in informed decision-making regarding their own lives. (Outcome 17).⁴

FNMA provides in-principle support for the ACMA’s commitment to designing an instrument to measure the public policy objectives of media diversity and localism, and submits our responses to key issues arising from the consultation to enhance and improve the effectiveness of the proposed Framework.

⁴ Australian Governments, *National Agreement on Closing the Gap*, July 2020, <https://www.closingthegap.gov.au/national-agreement/targets>



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?

In its current form, the Framework represents a start towards measuring and tracking levels of media diversity but requires additional development and refinement to be effective.

FNMA identifies those areas requiring such work in response to Questions 3, 5, 6 and under 'Other Matters'. We also consider diversity in the media workforce to be a major omission from the Framework, which is discussed in response to Question 5.

Additionally, if the Framework is to track changes in the news media landscape effectively over time, there needs to be some form of safeguard mechanism in place, perhaps through legislative instruments, to ensure that the Framework is maintained beyond the usual political cycles and changes in government. Such a mechanism also needs to ensure the long-term consistency of data capture and collection, as well as other matters of methodology regarding definitions of key terms (e.g. 'professional journalist', 'local'), geographic scale, and sampling etc., to ensure the data is truly comparable year-on-year.

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?

The use of the word 'health' is one of several definitional methodological issues in the current Framework. It is unclear from both ACMA's 2020 discussion paper and 2022 consultation paper what is meant by the term 'health' in this context – for example, whether it is a proxy for diversity – and what type of data will be captured to reflect the 'health' of local news. For example, none of the framing questions in Appendix A to the consultation paper explicitly refer to 'health of local news'. Does this term collectively refer to indicators such as the volume of local news produced; the diversity in/of local news sources; the content (number and diversity of topics) included in local news; and/or how particular places, people, cultural groups are portrayed in local news?

ACMA's 2020 discussion paper indicates that evaluation of the 'health' of local news encompasses a broad range of indicators:

Information diversity is also an important feature of a healthy news market. There are many types of news, opinion, and current affairs programs across the Australian media landscape, ranging from long-form, investigative style journalism, to shorter and more reactive stories on immediate events. Social news and user-generated news content all help contribute to greater levels of source diversity. Yet as traditional media outlets have made the transition to multi-platform suppliers, many commentators and

researchers have observed a noticeable increase in rates of ‘clickbait’ and ‘churnalism’, or the reliance on second-hand stories and recycled or repurposed content between publications and across platforms.⁵

This suggests the inclusion of other measures of ‘health’, which do not currently appear in the proposed Framework, such as genre, social media, and user-generated content. (See responses to Questions 3, 6 and 12 for further discussion.) Elsewhere the discussion paper refers to the ‘health of regional print media’ and specifically the coverage and circulation of regional newspapers.⁶

FNMA suggests further consideration of what a ‘healthy’ local news environment looks like and what pre-conditions are needed for such an environment to survive and flourish? Answers to these questions may reveal additional measures and indicators relevant to the Framework, including those above flagged within the discussion paper, which could be followed by pilot testing of the Framework to guide refinements to the indicators and metrics. FNMA’s responses to the following questions suggest directions in which the Framework could be broadened to foster the health and diversity of the local news environment through representing of First Nations media organisations and news sources.

3. Do you agree with the proposed scope of the news market?

We note the application of the proposed Framework is to be limited to professional sources of news with a level of connection to Australia, including digital news sites, podcasts, social media presence of media outlets but to exclude personal and community-based organisations without sufficient editorial independence.

There is a risk that the Framework’s proposed scope will not adequately or accurately capture Indigenous media sources, as many First Nations media organisations (FNMOs) operate on a community-owned, not-for-profit basis, particularly in remote areas. Their governance structures such as Boards include members drawn primarily from the local community – i.e. those within its footprint – which may contribute to a perception that many First Nations Media organisations lack sufficient professionalism to warrant inclusion in the Framework.

However, it is important that First Nations media organisations are owned and controlled by Aboriginal and Torres Strait Islander people. This means they are answerable to their communities and have editorial control over the choice of news stories, their prioritisation, and their broadcast frequency (see responses to questions 5 and 10 below). They are editorially independent within the scope of their community of interest, with equal opportunity for all audiences to access news content.

⁵ ACMA, *News in Australia: diversity and localism. News Measurement Framework*. Australian Government, Canberra, 2020, p30.

⁶ ACMA, 2020, p62.

First Nations media organisations are the primary providers of First Nations news and current affairs to their communities and are the key providers of mainstream news and current affairs to their communities in forms that are appropriate and relevant. Limiting the scope of the news market to that based on western concepts of ‘media’, ‘news sources’ and how production occurs runs the very real risk of excluding much of the diversity that the new Framework seeks to measure. **First Nations journalists also counter the lack of balance present in mainstream media outlets when reporting on matters relevant to Aboriginal and Torres Strait Islander people.** While they report challenges and negative stories, they also take pride in reporting successes and in doing so showcase examples of good news within First Nations communities. Aboriginal and Torres Strait Islander reporters have created an alternative source of news and current affairs through their own dedicated channels; one that reflects their own experience of Aboriginal and Torres Strait Islander people and cultures in a balanced way, rather than concentrating on negative stories which perpetuate negative stereotypes. The result is high levels of audience engagement, which is particularly relevant to Indicators 7 (Consumption) and 8 (Impact).

The inclusion of First Nations media organisations is essential, given First Nations people’s lack of confidence in mainstream and traditional news and media sources to represent diversity in delivering news. Recent research from the University of Canberra’s *Valuing Diversity in News and Newsrooms* project found that Aboriginal and Torres Strait Islanders were the least likely to agree ‘that news organisations are doing a good job of giving voice to the underrepresented (44%) and reporting on stories fairly based on the gender (47%) or ethnic or cultural background of those involved (58%) compared to other backgrounds.’⁷

FNMA is concerned that the proposed scope risks excluding most Indigenous voices across radio, TV, print and digital platforms, especially those in remote and very remote areas. In 2016, the McNair Ingenuity Indigenous Communications and Media Survey found the sector reaches significant audience share with 91% of people in remote First Nations communities being regular listeners to radio services and watching ICTV at least once per month.⁸ (See pp.2–3 of this submission for an overview of the First Nations Media sector’s scope.)

While the potential exclusion of First Nations media organisations from the proposed Framework is no doubt unintentional, it perversely excludes those whom, arguably, have the greatest capacity to contribute to news diversity, particularly at the local level. Collectively, these channels offer a wide range of programming, including news and current affairs reporting from a First Nations perspective, in over 25 Indigenous languages nationally, including the first language of many people in remote communities. It is also difficult to see how the measures for Indicators 1 – 6 at the ‘local’ level will be captured without including community-based news organisations, including First Nations media organisations. (N.B. Two

⁷ McGuinness, K., Park, S., Lee, J. Y., Fulton, J. and Lukamto, W, *Valuing Diversity in News and Newsrooms*. Canberra: News & Media Research Centre, University of Canberra, 2023, p.11

⁸ McNair Ingenuity Research and IRCA, 2016.

of the Indicators (Nos. 7 & 8) exclude the 'local' scale – i.e. will be restricted to State/Territory and National levels.)

The limited scope of the news market proposed for inclusion in the Framework (which limits First Nations Media participation/inclusion) will directly impact upon the effectiveness of the key measures. For example, regarding Indicator 5, Range of Viewpoints: First Nations Media actively contribute to content diversity and civic journalism. First Nations media exists due to the failure of mainstream media to adequately reflect Aboriginal and Torres Strait Islander people in news and public discourse. First Nations communities were first granted community broadcast licenses in the 1970s and 1980s as a policy response to the lack of opportunity for Aboriginal and Torres Strait Islander people to have their voices heard in media outlets. This imbalance in participation in the media still permeates Australia's media landscape today. First Nations broadcasting and media has a vital role in providing balanced and culturally appropriate reporting to promote awareness and understanding among non-Indigenous Australians, participate in the truth-telling process, encourage participation in democratic processes and promote reconciliation. In this way, First Nations news reporting is public interest journalism. First Nations Media Australia submits that any consideration of public interest journalism must include the need for a diversity of media that provides a full range of news, comment and opinions from mainstream and minority groups. The role of the Aboriginal and Torres Strait Islander community media sector (radio, TV, print and online) is a critical component of that diversity within the Australian media landscape.

FNMA further emphasises that mainstream media is influenced by commercial interests in a way that First Nations, community and publicly owned media is not. First Nations media organisations offer an important perspective to the national dialogue, including the views of people unlikely to share their stories with non-Indigenous news networks.

FNMA is concerned that limiting the scope of the news market to 'professional sources of news' will also minimise the potential number of First Nations media being included in the measures to larger organisations that have the financial capacity to afford professional journalists and associated editorial support. The First Nations Media sector is characterised by a multi-disciplinary dynamic in which most media workers fulfil multiple roles: they are community journalists, they are editors, they are reporters sharing news with communities in the form of news stories told through print articles, news bulletins, current affairs discussions, interviews, updates, observations and conversation. They perform a wide range of journalistic activities, with or without tertiary qualifications and usually across multiple mediums. Despite this, our sector's news creators must adhere to their station's editorial standards, and the Community radio or Community TV Codes of Practice, as registered with the ACMA under the *Broadcasting Services Act*, which ensures journalistic compliance and rigour.

Part of this multi-disciplinary dynamic results from changes in the media landscape. First Nations media organisations must serve their communities which, in an era where media delivery is both fragmented and convergent, means being in all the spaces where audiences

expect to access content. Radio stations are now expected to be ‘more than just radio’ by audiences, funders, content-maker and marketing platforms. The era of media convergence has made it easier for First Nations radio stations to produce and deliver content across a range of platforms. Therefore, in addition to providing 24-hour radio services, First Nations radio stations are producing an average weekly total of 30 hours podcast content per week, 209 hours of video content and 51 hours of online only content sector-wide.

The proposal to limit the scope of the news market is also inconsistent with other Commonwealth Government policy instruments at broad level, such as *Closing the Gap* and the *National Cultural Policy*. This is discussed in more detail in response to Question 5 and under ‘other matters’ respectively.

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

While the existing measures represent a good start towards capturing diversity and localism, additional measures are required, which are discussed in the section below, in addition to the requirement to understand diversity in the media workforce.

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

FNMA strongly urges the inclusion of three additional measures in the Framework:

- **Media workforce diversity**
- **First Nations representation/participation**
- **Accessibility**

The inclusion of these additional indicators is to mitigate shortcomings in existing key indicators, including Indicators 1 and 3 relating to Source diversity and Indicator 4, News Output – Range of Topics.

FNMA recommends that these indicators are included to ensure that the proposed Framework is consistent with the National Agreement on Closing the Gap which commits governments to fulfilling various outcomes, including Outcomes 16, and 17, which are of key relevance to the policy objectives of the ACMA’s news measurement Framework.⁹

Each new indicator is discussed in more detail below. Potential sources of data are identified at Question 7.

Recommended new Measure:

Media Workforce Diversity

Recommended new Indicators of Media Workforce Diversity:

⁹ Australian Governments, *National Agreement on Closing the Gap*, July 2020, <https://www.closingthegap.gov.au/national-agreement/targets>

Age, gender, ethnic/cultural background, people with disability, languages spoken, qualifications, speciality areas (e.g. economic/finance reporting, war correspondent, politics etc), media format (i.e. radio, newsprint etc), media/news organisations worked for (both in Australia and overseas), plus any non-media related qualifications, since these are likely to influence viewpoints, types of stories reported on, etc.

Rationale for inclusion of Media Workforce Diversity

Research has demonstrated a clear link between diversity in the workforce and the likelihood of greater diversity in the media and news content. For example, the University of Canberra's *Valuing Diversity in News and Newsrooms 2023* study found that journalists of non-Anglo, non-European backgrounds are more likely to prioritise improving ethnic or cultural diversity (36%), compared to those of Anglo-Celtic or Australia/New Zealand backgrounds (30%).¹⁰ The study also states that university journalism schools (and other journalism-related institutions) have generationally excluded those from non-dominant backgrounds and that within newsrooms there is a strong tendency for those in authority to hire people like themselves, 'like-hires-like', contributing to a lack of diversity over time.¹¹

Who Gets to Tell Australian Stories 2.0, the 2022 'report card' produced by the University of Sydney, Jumbunna Institute and Media Diversity Australia regarding Indigeneity and Cultural Diversity in television news, revealed that media diversity in Australia remains poor, with Anglo-Celtic representation at levels well above the general population. For example, 'no Indigenous presenters or reporters were identified at the Seven Network, which has the least on-air cultural diversity'.¹²

A 2020 article, 'Australia's media has been white for too long,' in *The Conversation* also drew attention to the fact that one in four of Australia's 25M people were born overseas, although a 2016 PwC report revealed that 83% of Australia's media workers are monolingual and speak only English at home.¹³ The article highlighted that diversity and inclusion represent long-standing challenges in Australia, including within the media space. FNMA supports the Local and Independent News Association's (LINA) submission's suggestions that diversity of journalists be included as a measure under Indicator 5, and that consideration be given to the journalist's physical location, and the connection between the reporter and the community (especially First Nations and CALD) for whom they provide news services is significant in its implications for communities' trust in news.

¹⁰ McGuinness et al., 2023, p.12.

¹¹ McGuinness et al., 2023, p.16.

¹² Jumbunna Institute, *Who gets to tell Australian stories 2.0*, Sydney: University of Sydney, 2022,

https://www.mediadiversityaustralia.org/wp-content/uploads/2022/11/01_Who%20Gets%20to%20Tell%20Australian%20Stories%20Infographic.pdf

¹³ Janak Rogers, 'Australia's media has been too white for too long. This is how to bring more diversity to newsrooms', *The Conversation*, 7 July 2020. <https://theconversation.com/australias-media-has-been-too-white-for-too-long-this-is-how-to-bring-more-diversity-to-newsrooms-141602>

There is great potential for the News Measurement Framework to act as a lever to encourage greater diversity and inclusion in the Australia media workforce through formally including these measures in the Framework.

Recommended new Measure:

First Nations representation/participation

Recommended new Indicators of First Nations representation/participation:

In considering how critical First Nations media representation and participation is in achieving the Closing the Gap outcomes, the Lowitja Institute and FNMA paper, *Closing the Gap and First Nations peoples representation in the media*, identified a list of ‘drivers’ that could function as indicators of First Nations representation in the media. FNMA recommends that these indicators be included in the Measuring Diversity in News Framework:

1. Content – Levels of First Nations stories and content across different sources (news and current affairs programming, Australian drama)
2. Medium – Levels of First Nations stories and content across different mediums (TV, radio, print, online, digital)
3. Reach and range – Levels of distribution of First Nations stories and content (audience reach, screen / audio time, number of outlets, range of service)
4. Production – Proportion of First Nations stories and content produced by First Nations led and controlled media organisations
5. Presence – Levels of screen, audio and online presence of First Nations peoples (number, percentage, proportion of population, position / role)
6. Ownership – Proportion of ownership of media outlets by First Nations organisations (by community-controlled and other First Nations organisations)
7. Employment – Number and proportion of First Nations peoples working in media organisation (by position, First Nations media organisations and other media organisations).¹⁴

Rationale for inclusion of First Nations representation/participation

In addition to the arguments and data put forward in response to Question 3 regarding ensuring the inclusion of First Nations media organisations in the scope of the news market, FNMA strongly recommends that this measure be included to ensure that the proposed Framework is consistent with the National Agreement on Closing the Gap outcomes, specifically Outcomes 16 and 17.

Regarding Outcome 16 of Closing the Gap – it is important to note that not only do First Nations media play a significant role in the maintenance, development and preservation of Australia’s unique First Nations culture and languages by broadcasting and communicating information in these languages, but that in many areas of the country, especially remote and

¹⁴ Lowitja Institute. (2022). *Closing the Gap and First Nations peoples representation in the media*. A report prepared by the Lowitja Institute in Partnership with First Nations Media Australia, May 2022, p.12.

very remote areas, Indigenous broadcasters provide the only source of news information and messaging in First Nations people's languages. The 2016 Indigenous Media and Communications Survey found that First Nations broadcasting and media reach approximately 47% of the Australian Aboriginal and Torres Strait Islander population, with First Nations radio listenership increasing to 63 % in remote and 80 % in very remote areas. Nationally, 48 % of First Nations people said they listened to First Nations radio for 'the First Nations focus in programs/news & current affairs', with 61 % of remote-living respondents saying that local Indigenous community radio provided their main news source and 56 % of remote respondents saying they listened to Indigenous radio stations to 'hear people talking in my own language'.¹⁵

Indicator 4, News Output, Range of topics – regarding Indicator 4, the proposal to count articles by category or news topic as a measure of content diversity, may not adequately capture First Nations representation and participation in the media landscape. Similarly, the proposed content diversity measures (by 'topic' and simplistic 'hard' vs 'soft' news categories) will not necessarily capture the true extent of First Nations content. **Indicators 1 and 3, Source diversity, counts of news outlets and number of owners**, also will not necessarily reflect diversity, thus we urge the inclusion of a separate First Nations representation/participation measure and relevant indicators.

Recommended new Measure:

Accessibility

Recommended new Indicators of Accessibility:

Presence/absence of internet connectivity, type of connectivity (e.g. Satellite, Mobile broadband, FTTN, FTTP, Community wi-fi etc), number of TV stations accessible, number of radio stations accessible.

Rationale for inclusion of Accessibility

FNMA strongly urges the inclusion of at least one additional measure in relation to news infrastructure, which is accessibility (as opposed to availability). Whilst access may not lead to consumption of news, it is a pre-requisite to be able to choose to consume news content. This is particularly the case in an increasingly digital and on-line world; without connectivity there is no or very limited ability, to access whatever news sources may be available. It is important to be cognisant that even in 2023 there are parts of Australia that lack the type of connectivity that is taken for granted in the metropolitan/urban areas.

Therefore, for each sampling locality there needs to be a benchmark measure of accessibility established (i.e. is there internet connectivity; is there TV and radio?), against which the availability and diversity of news can be considered. In some cases a lack of diversity of media may be primarily reflective of a lack of connectivity infrastructure, rather than availability of news/an actual lack of media presence in that locality. Data obtained from comparing

¹⁵ McNair Ingenuity Research and IRCA, 2016.

accessibility to availability can then directly inform related Government policy objectives, such as those relating to telecommunications such as the Better Connectivity Plan for Regional and Rural Australia, and associated funding programs such as the Remote Connectivity Program and the Mobile Black Spot program.

ACMA should also keep a watching brief on developments in improving data in meeting the Closing the Gap targets following the formation of the First Nations Digital Inclusion Advisory Group in late 2022. This group will advise the government on how the national collection of data on Indigenous digital inclusion might be improved in order to meet Target 17 of the National Agreement on Closing the Gap: that by 2026, Aboriginal and Torres Strait Islander peoples will have equal levels of digital inclusion. Priority Reform Four in the National Agreement aims for First Nations people to have access to locally relevant data to enable them to monitor the implementation of efforts to Close the Gap. Consideration should be given to linking any new data collection measures regarding First Nations people's internet access to the Framework.

In many parts of the country, First Nations media organisations address a market gap through providing essential information to many remote communities not serviced by any other form of media. This includes the dissemination of vital emergency, health, and government information. In 82 regions across the country, First Nations radio is the only radio service available. In a further 16 locations, First Nations radio is the only local service available, in addition to ABC services retransmitted from other regions. Indigenous Australians have relatively low levels of digital inclusion, which have not improved in recent years. The digital inclusion gap between Indigenous Australians and other Australians is evident across access, affordability, and digital ability considerations. In 2020, the Australian Digital Inclusion Index score for Indigenous Australians is 55.1, a total 7.9 points below the national average with affordability being a key barrier. More than 2.5 million Australians remain offline. This includes 24.7% of Indigenous Australian households who do not access the internet from home, compared with the national average of 14.7%. Levels of home internet access for Indigenous Australian households diminish further with remoteness, with up to 45.2% of households in remote and very remote locations unable to access the internet. In this context, First Nations media is the primary information source for both Indigenous and non-Indigenous audiences in many remote communities.

Therefore regarding Measure 3, Source diversity, count of the number of media networks owners (and, if available, controllers) of local news outlets in sample localities, the sample localities should take into consideration geographic coverage (i.e. include localities from metropolitan, inner regional, outer regional, remote and very remote locations) as well the underlying variability in audience demographics (i.e. ensure areas with a high proportion of Indigenous and migrant audiences are captured). Sampling issues are discussed in more detail under 'Other Matters'.

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?

FNMA is of the view that the Framework does not adequately consider the impact of social media and other digital platforms; the proposal to limit the measures to ‘professional’ news sources is inconsistent with data regarding contemporary media consumption habits. The ACMA discussion paper indicated that 25% consume news online, and 18% from social media/blog. More recent research has pointed to sharp falls in the consumption of broadcast and print media, whilst social media has become increasingly prominent. For example, 56% of digital news consumers use at least one social media platform to get news on a weekly basis.¹⁶

Additionally, younger generations use more social media platforms to consume news compared to older generations. Research by Parkes et al. (2022) found that half of Gen Z use six or more social media platforms for news in the last week, whereas the majority (65%) of those aged 76+ never used social media to access news in the last week.¹⁷ If the Framework fails to capture social media and other digital platforms then it runs the risk of primarily only measuring the news consumption habits of an older demographic, i.e. a more traditional news consumption type group, and one that is beginning to decline as a proportion of the Australian population. Whilst the ‘Boomer’ generation has traditionally been the largest age demographic group in the Australian population, the 2021 Census revealed that the ‘Millennials’ have essentially caught up with the Boomers, each group now representing 21.5% of the Australian population.¹⁸ The relevance of adequately capturing the consumption habits of the younger demographic is particularly important in the context of First Nations people, who continue to experience levels of disadvantage that directly contribute to a reduced life expectancy (median age at death in 2021 was 61.7 years for Indigenous people compared to 82.0 years for non-Indigenous people)¹⁹ and younger median age compared to the Australian population as whole in 2021 (24 years²⁰ and 38 years respectively²¹).

The discussion paper that preceded the current consultation paper recognised that news is now being forced to compete in the attention economy – i.e. on social media – but **by limiting the scope of the Framework to social media operated by professional news outlets, it is unlikely to capture the evolving nature of what constitutes news platforms in the social media space.** A good example of this is IndigenousX, which is an example of a news editorial service

¹⁶ Park, S., McGuinness, K., Fisher, C., Lee, J. Y., McCallum, K. & Nolan, D., *Digital News Report: Australia 2022*. Canberra: News & Media Research Centre, University of Canberra, 2022, p87.

¹⁷ Park et al, 2022, p.87.

¹⁸ Australian Bureau of Statistics, ‘2021 Census shows Millennials overtaking Boomers’, media release 28/6/2022. <https://www.abs.gov.au/media-centre/media-releases/2021-census-shows-millennials-overtaking-boomers>

¹⁹ Australian Bureau of Statistics, *Deaths, Australia*. ABS, 2021, <https://www.abs.gov.au/statistics/people/population/deaths-australia/latest-release>.

²⁰ Australian Bureau of Statistics, *Australia: Aboriginal and Torres Strait Islander population summary*. ABS, 1 July 2022, <https://www.abs.gov.au/articles/australia-aboriginal-and-torres-strait-islander-population-summary>.

²¹ Australian Bureau of Statistics, *Snapshot of Australia*, ABS, 2021, <https://www.abs.gov.au/statistics/people/people-and-communities/snapshot-australia/latest-release>.

which began as a Twitter feed, now shared between different Aboriginal and Torres Strait Islander curators each week. While it still has a strong Twitter presence, IndigenousX is now a dynamic website and communications business, employing a small team of journalists and media specialists. There are several Indigenous owned podcast sites and communications agencies emerging in this space.

Regarding including social media platforms run by professional news outlets, there also needs to be some capacity to distinguish between the uses to which these social media platforms are being put. Are they providing news, or are they serving primarily to channel news audiences to other platforms run by that same news outlet? For example, radio stations are using social media functions such as Facebook live as audience engagement tools to highlight outside broadcast activities or live to air studio events. However, this type of content is largely used as a promotional tool to draw audience attention to FM/AM broadcast services, rather than as a primary news channel.

7. Is there any additional third-party research or data that could be relevant to help inform the final design and/or implementation of the ACMA's news measurement framework?

In addition to the recent (post-2020) research and data sources we have cited in this submission, and sources identified in the consultation paper (i.e. PIJL news measurement datasets; UTS projects, European Commission and Canadian projects), there are other potential sources of information relevant to the news measurement Framework.

In relation to the proposed new measure, Media Workforce diversity, ABS data at the 6-digit level for media related occupations, could provide data regarding age, sex, gender, Indigenous status, ethnicity, country of birth, Languages spoken at home, Qualifications etc in the first instance.

In relation to the proposed new measure First Nations representation/participation, Tables B and C in Lowitja Institute (2022) identify several potential sources of data available to capture First Nations media representation. Although there remain gaps in our knowledge of First Nations news creation, production, and consumption (see response to Question 10), we submit that this is not a valid reason to exclude a measure and indicators devoted to capturing First Nations media representation and engagement.

Regarding the proposed new measure Accessibility, the *Measuring Australia's Digital Divide: Australian Digital Inclusion Index 2021*²² and future iterations may provide relevant data in relation to accessibility, as well as First Nations representation/participation.

²² Thomas, J., Barraket, J., Parkinson, S., Wilson, C., Holcombe-James, I., Kennedy, J., Mannell, K., Brydon, A, *Australian Digital Inclusion Index: 2021*. Melbourne: RMIT, Swinburne University of Technology and Telstra, 2021, DOI: 10.25916/phgw-b725

FNMA also wishes to draw ACMA's attention to the National Indigenous Australian Agency (NIAA) Policy & Evaluation project currently underway that seeks to demonstrate the contribution of First Nations broadcasting and media to Closing the Gap by evaluating the Indigenous Broadcasting and Media Program, following recommendation 1 of *Renewing a Vital Indigenous Voice and Community Asset – The Indigenous Broadcasting and Media Sector*.²³ This project seeks to articulate the public value of the First Nations sector and to align the Indigenous Broadcasting and Media Program with the Closing the Gap outcomes. It will develop a Monitoring and Evaluation Plan for measuring the outcomes and impacts of First Nations broadcasting and how they contribute to Closing the Gap. NIAA will undertake consultation on this project during the first half of 2023, with a new framework to be released mid-year.

8. Should the ACMA seek to incorporate and build on existing third-party data when implementing its news measurement framework?

Given ACMA's stated desire to avoid duplication (and associated costs) in developing the Framework, third-party data should be utilised wherever possible, noting there may be issues regarding methodologies by which different sets of third-party data have been captured, that may impact upon the reliability, and accuracy of the data and importantly, ability to compare data over the years and across data sets. This will need to be taken into consideration. Should the methodological differences underpinning different datasets be significant, then consideration should be given to establishing and maintaining different measures according to each dataset (i.e. do not aggregate data, but compare results year-on-year within each existing data set, and then look at trends across all data sets).

Depending on the datasets there may be issues in relation to intellectual property rights, but if ACMA entered formal partnerships with these third-party organisations, then those issues could be mitigated to some extent.

9. Are there any restrictions or barriers to the acquisition, sharing or use of proposed third-party research or data that we should be aware of?

Response as per no. 8 above.

10. What are the most significant outstanding data gaps, and how should these be prioritised?

FNMA has identified two potential data gaps have been identified in the consultation paper's Framework: the number of active journalists operating in Australia; and news sources that are most consumed by, and have the greatest impact on, Australians (the latter including research regarding consumption, trust, and reliance on individual sources of news across platform types). We also note the proposition that this data could be supplemented with third-party

²³ Hugh Watson consulting, *Renewing a Vital Indigenous Voice and Community Asset – The Indigenous Broadcasting and Media Sector*, Canberra: Commonwealth of Australia, 2021.

sources of cross-media consumption or ratings data, from companies like OzTAM, IAB, Nielsen or Roy Morgan.

We reiterate the point made in our response to Question 8 regarding the potential impact of different methodologies employed by different organisations, and highlight a specific concern regarding geographic coverage (discussed in ‘Other Matters’). Further research on news consumption habits, trust and reliance among Australians has merit but any such study should ensure that the sample captures the diversity of First Nations and migrant communities across Australia.

Elsewhere in this submission, we have drawn attention to the significant gap regarding contemporary Indigenous news creation, production, and consumption by Indigenous and non-Indigenous audiences. As demonstrated by data provided earlier in this submission, First Nations media has specific characteristics distinct from non-Indigenous media that warrant a more nuanced understanding than what is currently available.

The depth and coverage of McNair Ingenuity Research and IRCA’s comprehensive Indigenous communications and media survey in 2016, which captured a range of demographic, technology access and other data across radio, television, and print media, remains unmatched by any subsequent research focussed on this part of the sector.²⁴ However, the data is now seven years old and thus out of date in the rapidly changing media landscape. A new communications and media survey is therefore required to update knowledge and understanding of this sector and to ensure that future decisions are based on a robust evidence base.

11. Do you have views on potential pilot projects that the ACMA could undertake in 2023? What should be the ACMA’s ongoing role in relation to these news measurement activities?

Any projects concerning Indigenous media should adopt the principles of co-design and fully informed consent regarding participation in accordance with the [AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research](#).

12. Are there opportunities for the ACMA to collaborate with research organisations to help implement the news measurement framework?

FNMA wishes to take the opportunity to highlight that the ABS is currently seeking public input regarding the questions that will appear on the next Census. We recommend that ACMA explore the potential for working with the ABS to develop questions to allow the development of a robust baseline for the news measurement framework which could appear in the next Census.

²⁴ McNair Ingenuity Research and Indigenous Remote Communications Association, (2016).

Other matters

Alignment with other Commonwealth Government policy instruments such as the National Cultural Policy

First Nations Media are a significant part of the community broadcasting ecology; excluding or minimising First Nations people in the proposed Measuring Framework for News Diversity and Localism, is at odds with *Revive: Australia's Cultural Policy for the next five years*, which clearly aims to increase First Nations capacity, capability, and participation in the news media space.²⁵ Pillar 1 of the Policy 'First Nations First' recognises and respects the crucial place of First Nations stories at the centre of Australia's art and culture. Furthermore, one of the actions identified in *Revive* is to 'increase support for community broadcasting to deliver local news, tell local stories, and provide a platform for diverse voices and Australian music'²⁶. There is the potential for the Measuring Framework to directly inform upon the policies and programs that will facilitate this action item.

Methodological issues

There needs to be greater clarity within the Framework regarding how the term 'local' is used, a point also raised by Australians for a Murdoch Royal Commission (AMRC) in their submission. In its current form in the Appendix, it is used to refer to a notion of geographic scale (e.g. National, State/Territory, Local) as well as the type of content (local content are local if they relate to a licensee's licence area as per *Broadcast Services (Meaning of Local) Instrument 2018*). The geographic usage of 'local' needs to be explicitly defined. We note the discussion paper refers to using LGAs, aggregated into 'geotypes'. The ACLA's 'geotypes' are problematic regarding large areas of northern Australia (WA, NT, QLD) where the chief agricultural industry activity is the pastoral sector, thus there is no meaningful distinction between 'Rural agriculture' and 'Rural remote' because they are the same thing (most of the NT falls into this category).

Instead of the ACLA's geotypes, we suggest sampling at LGA level, ensuring that the five ABS remoteness categories are represented, that is: select LGAs located in the Metropolitan, Inner Regional, Outer Regional, Remote and Very Remote locations. The ABS remoteness categories reflect distances to services; as news is a service, there will be a strong negative correlation between the remoteness categories and extent of media diversity. An additional rationale for adopting the five ABS remoteness categories is that all too often, remote and very remote locations are excluded from studies and surveys (including in media polls) on the basis that gathering data from remote areas is 'too hard', 'too expensive', and/or 'too time-consuming'. Or, if they are included, they are lumped in with 'regional' or 'rural' which fails to acknowledge the very specific and well documented socio-economic and geographic differences between these areas. This results in a well-known 'data drought' for these areas,

²⁵ Commonwealth of Australia, *Revive: a place for every story, a story for every place – Australia's cultural policy for the next five years*, Canberra: Commonwealth of Australia, 2023, <https://www.arts.gov.au/publications/national-cultural-policy-revive-place-every-story-story-every-place>

²⁶ Commonwealth of Australia, 2023, p.89.

which collectively cover much of the northern half of Australia. In turn, this impacts upon policy and program decision-making, often to the (unintended) detriment of these regions.

We note that the discussion paper foreshadowed a sampling strategy across a limited number of LGAs (around 20). This would represent less than 5% of LGAs across Australia (there are 537, plus large areas of unincorporated land, including land in populated areas such as Darwin and Cox Peninsula, for example) and thus arguably would not be a representative or statistically valid sample. There is also enormous variability in the size of these LGAs, both geographic area and population. For example, East Pilbara (the largest LGA by area) occupies 379,571 sq km (larger than the state of Victoria) but is only populated by around 11,500 people, whereas the Shire of Peppermint Grove Council only occupies 1.4 sq km, with 1524 residents²⁷. These factors will need to be taken into consideration when comparing results across LGAs i.e. at the local geographical level. The submission by AMRC also raises concerns regarding the proposed sampling strategy, including the potential for LGAs with less than 10,000 people to be excluded; FNMA shares these concerns.

FNMA also suggests that the rather simplistic categorisation of news as being either ‘hard’ vs ‘soft’ be reconsidered as it is difficult to see how the use of these two categories would add greatly to our understanding of media diversity and localism. An additional complexity is that whether a news story is ‘hard’ or ‘soft’ may vary according to context; for example, a weather story about an area subject to extreme flooding would certainly not be considered ‘soft’ news by the local community at the time. We support the reservations that LINA expresses in their submissions that this distinction is based on outdated terminology for categorising content in the local media landscape.

We iterate our concerns regarding the definitions of what constitutes a professional journalist, the proposed scope of the news market, and social media (discussed at Questions 3 and 6).

Recommendations

In summary, FNMA supports the development of a Framework to measure diversity in media across Australia. FNMA makes the following recommendations to strengthen the proposed framework:

- that First Nations Media organisations, regardless of their underlying governance structures, be included in the scope of the proposed news market.
- the inclusion of three additional measures (and associated indicators):
 - Media workforce diversity
 - First Nations representation/participation
 - Accessibility.

²⁷ Australian Local Government Association. <https://alga.com.au/facts-and-figures/>.

- that ACMA consider employing the indicators identified in the Lowitja Institute & FNMA paper, *Closing the Gap and First Nations peoples representation in the media*, in the Framework for monitoring First Nations peoples' representation and participation.
- that there be further consideration of and consultation with the media sector regarding the scope of digital media for inclusion in the Framework, along with potential measures and indicators.
- that there be further research into news consumption habits, trust, and reliance among Australians (with the proviso that such research includes a statistically valid sample of people from First Nations and migrant communities), along with a repeat of the 2016 Communications and media survey in remote Indigenous communities.
- that ACMA consider how the Framework aligns with the goals and targets of other Commonwealth Government policies, including the National Agreement on Closing the Gap, *Revive: Australia's Cultural Policy* and the Better Connectivity Plan for Regional and Rural Australia.
- That a safeguard mechanism is included to ensure that the Framework is maintained beyond the usual political cycles and changes in Government. Such a mechanism also needs to ensure the long-term consistency of data capture and collection to ensure the data is truly comparable year-on-year.
- that further clarity and consistency is provided around the use of particular terminologies such as 'local', 'health' (of local news) and 'journalist'.
- that, for the purposes of sampling, the Framework adopt the ABS Remoteness Categories at the broad regional level, and local government areas (LGAs) at the local level, in addition to the proposed National and State/Territory units.