

How the corporate sector establishes models of best practice to foster better engagement with Aboriginal and Torres Strait Islander consumers



Response to the House of Representatives Standing Committee on Indigenous Affairs inquiry 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 displace those submissions.

About this submission

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 at August 2021, FNMA's membership includes 62 organisations and 167 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. This submission is informed by ongoing consultation with the membership and the broader media sector and its stakeholders to understand missed opportunities and potential improvements for greater engagement with Aboriginal and Torres Strait Islander communities through First Nations media channels in print, radio, television and online.

As part of its industry leadership role, FNMA seeks to ensure First Nations communities have access to information required to make informed decisions, as voters, as communities and as consumers. This submission addresses corporate engagement with Aboriginal and Torres Strait Islander people as consumers, as business stakeholders and as Reconciliation Action Plan partners.

The crossover of infrastructure, digital literacy, media 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.

FNMA welcomes the opportunity to respond to the Terms of Reference for the inquiry into how the corporate sector establishes models of best practice to foster engagement with Aboriginal and Torres Strait Islander consumers and has responded to the four key areas of consideration in this submission.

About the First Nations media sector

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 as at April 2021, 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.
- 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 are able to 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



¹ McNair yellowSquares, *Indigenous Communications and Media Survey*, 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



1. The way the corporate sector supports meaningful engagement with Indigenous consumers.

To support meaningful engagement with Indigenous consumers, the corporate sector should be encouraged and motivated to:

1. Include Aboriginal and Torres Strait Islander people in the design and planning of products and programs to ensure they are fit-for-purpose, appropriately adaptable to consumers' environments and that potential impacts on First Nations communities are considered;
2. Go beyond advertising the availability of products to empower consumers to make informed decisions about their purchase options and alternatives through education campaigns;
3. Raise awareness of consumer rights and complaints processes among Indigenous consumers; and
4. Encourage open and transparent relationships with First Nations communities.

While the corporate sector has reputational risk and operational considerations associated with maintaining good relationships with Indigenous consumers at a high level, the motivations for ensuring transparency and fair representation of consumer information do not necessarily flow through corporations to sales outlets working to profit-based incentives. This has caused issues with telecommunications providers recently and previously with financial service and other providers who can and have profited from vulnerable populations with limited capacity for cross-referencing research. First Nations communities have been burned repeatedly through misplaced trust.

While the ACCC and ACMA processes have been effective in addressing consumer complaints in some instances, it takes a considerable level of English literacy and telecommunications connectivity to alert Government agencies to issues. Ideally, mis-selling and misrepresentation would be addressed at the source through education programs. The Government is currently taking action to address scamming through eSafety programs. Similar consumer education campaigns should be developed to empower Aboriginal and Torres Strait Islander people to negotiate purchases, contracts and other relationships with the corporate sector as part of any best practice engagement model.

First Nations media organisations are well placed to support such education programs through the production and distribution of culturally relevant campaign materials. Similarly, First Nations media organisations are a potential forum for open discussion of new developments; an opportunity for direct feedback from Indigenous consumers through engaged audiences and social media channels; and a public facilitator of discussion on issues that could impact local communities. Each of these activities would support more meaningful engagement between Aboriginal and Torres Strait Islander people and the corporate sector. Appropriate communication allows space for explanations, for questions, for listening and for learning on all sides. FNMA suggests this is a significant missing piece from most corporate sector planning and a requirement for best practice.

2. How to strengthen corporate sector cultural understanding, and how this is demonstrated through their engagement with Indigenous consumers.

While consumer education programs are required for First Nations communities, ongoing education is required for the corporate sector to strengthen cultural understanding and to keep it front-of-mind. Often, individuals will participate in some form of cultural competency training as part of their induction or professional development only if their role is specific to relationships with First Nations communities. Rather, the corporate sector needs to take a 'whole of business' approach to cultural understanding, including frontline staff, HR staff and management. Beyond a one-off cultural competency opportunities, staff need to participate in regular training to bring cultural understanding back to the forefront and challenge the ways in which they are implementing cultural considerations in their everyday roles, as well as visual reminders such as collateral displayed across the organisation (posters, brochures, signage in Indigenous languages. In this way, cultural competency becomes embedded in the fabric of corporations, rather than being perceived as a burden. IndigenousX is one example of an Indigenous-owned business delivering courses that challenge organisations to go beyond cultural 'competency' and consider anti-racism actions within their work practices.

Cultural understanding is always strengthened by empowering Aboriginal and Torres Strait Islander people to tell their own stories. Too often, marketing and other communication collateral targeted to Aboriginal and Torres Strait Islander people is developed and produced by non-Indigenous people and agencies. It does not resonate with First Nations communities and worse, it speaks on behalf of people rather than allowing Aboriginal and Torres Strait Islander people to share their own views and reflections on corporate relationships. A recommendation from a trusted source is always stronger. The corporate sector could demonstrate stronger engagement with Indigenous consumers by engaging Aboriginal and Torres Strait Islander people in the production of their communication products and First Nations media in the distribution of communication products and could implement RAPs through engaging First Nations media organisations to produce their internal communication collateral too (eg. explanatory video content).

3. The impact of Reconciliation Action Plans (RAPs) in developing targeted approaches on engaging with Aboriginal and Torres Strait Islander people through such actions.

RAPs have resulted in varying outcomes for corporations. Within the communications sector, the ABC's Elevate RAP has been instrumental as a platform for positive changes in the way the ABC works with the First Nations media sector and a very positive example of RAP implementation. However, RAPs are often signed and relegated to implementation through a small team adjacent to core business. Some organisations produce printed copies of their RAP for distribution among all staff, but too often this is a one-off at time of signing, or not considered a priority in all departments.

FNMA sees little evidence of RAPs being understood and implemented through mid-level management, marketing, promotional and communication activities across the corporate sector. First Nations media organisations are well placed to assist the corporate sector with actioning RAPs by developing internal communications products to explain why RAPs are important and how they can be useful across the whole business. This would strengthen understanding of RAP commitments

and support better outcomes from RAPs. It is important that RAPs are understood by Heads of Departments, HR and communication staff so that corporations don't stifle their own opportunity to benefit from RAPs and to reduce the amount of time RAP Committees are required to spend convincing their own businesses to fully implement RAPs. FNMA suggests a best practice model should address the capacity within corporations to fully engage with RAPs across the whole of the business.

