

CBF's Response to the Community Broadcasting Program Evaluation undertaken by Social Research Centre

September 2023

Overall, the Community Broadcasting Foundation (CBF) is very pleased with the Social Research Centre (SRC) report on the evaluation of the Community Broadcasting Program (CBP) and feel that the future needs identified are largely in line with Roadmap 2033 (the 10-year Roadmap for community broadcasting developed by the sector).

The SRC report provides a positive endorsement on how the CBF is administering the CBP fund and provides a useful benchmark for future evaluations. The process has been a productive exercise from our perspective, but on reflection we have some suggestions, detailed below, that may help future evaluations to be even more useful for our work.

Many of the identified issues and subsequent recommendations in the report highlight inherent tensions that we manage, particularly within the constraints of the current funding envelope. Appropriately and strategically balancing support for core operational costs versus investing in development opportunities that provide resilience and sustainability to applicants is a very real challenge that we face every grant round. Further, the opportunity to invest in longer-term granting opportunities, while an important strategic priority, is challenging when the grant programs are under such demand within the current funding envelope. Similarly, it could be argued that the premise of 'sustainability' and 'reliance' depend on the policy perspective in relation to adequate public funding of public good and critical community assets.

Whilst acknowledging that the report is a research report, largely focused on the data, we feel that the report, and the evaluation process, would have benefited from further contextual information that better explained the guiding principles behind community broadcasting and what elements are specifically funded through the CBP. We feel that it would be of benefit for future independent evaluators to spend more time gaining insight into this context by better balancing their analysis of the grant data with contextualising input from us. We also feel that the Terms of Reference for future evaluations would benefit from emphasising analysis of our data and practices against best practice in grant-making.

There are a number of areas where there is contextual information missing that would explain the results being discussed or that with further analysis may support the CBF's practices. Examples of this include:

- Providing a breakdown of the specific funding lines of the CBP would provide context and reasoning for some of the results that have been identified within the report - such as the number and quantum of grants provided to Ethnic and RPH applicants and which are a result of specific funding allocations to support these outcomes. The report however claims that "qualitative data does highlight a common sense in the sector that applications aimed at diverse groups are more likely to be assessed positively over mainstream, faith-based and general interests." ¹ The specifics of the funding line breakdowns would largely explain this result as a factor of Government priorities supporting particular communities of interest through specific funding provisions, rather than being an outcome of the decision-making practices of the CBF through the grant process.
- By not explaining the context, make-up and diversity of community broadcasting the report ignores the inherent challenges of the sector such as the capacity issues and largely volunteer nature of the sector overall. With that there are very disparate grant writing skills across the sector and whilst the CBF tries to mitigate this through our equity of access, training and support programs, there are still challenges for smaller, regional and often volunteer-run organisations to secure funding. It would have been useful, for example, for the evaluators to consider the adequacy and impact of our 'score-bump' process for lower income and regional applicants which is not even mentioned throughout the report.
- The report concludes that there are "some areas of unmet need" with a weighting of grants allocated to stations in NSW and Victoria.² This result makes sense however given the majority of community broadcasting licensees (and in fact the population) are located in these states. The report claims in the same paragraph that "higher proportions of funding" are allocated to metropolitan stations³ which can be explained by the inherently higher costs in these areas due to rents, rates, salaries and other operating and broadcasting costs increasing the value of grant applications from metropolitan-wide licensees. Similarly, the majority of full-time ethnic and RPH licensed services are in the capital cities and these services are generally supported as a result of the Government identified funding allocations mentioned earlier.
- A further conclusion that a lower proportion of applications are fully funded in remote areas⁴ may be the result of the complementary funding being supplied by the National Indigenous Australians Agency (NIAA) for Remote Indigenous Broadcasting Services (RIBS).

The conclusions being drawn in the report without this contextual information could result in readers considering that the CBF has biases in place within its granting practices.

¹ Social Research Centre, Evaluation of Community Broadcasting Program: Final Report, August 2023 p.19

² Ibid. p.46

³ Ibid. p.46

⁴ Ibid. p.46

One of the report's recommendations is to ensure the peer assessment process is representative of the sector.⁵ We feel that this recommendation has been formed without any real assessment of the current make-up of the broader pool of Assessors or detailed understanding of the assessment process. Our Assessor Pool and the peer assessment process is as diverse as the sector we serve and for the evaluator to suggest that representation can be ensured shows a lack of understanding of the complexity and nuances within community broadcasting. The make-up of our Assessor pool and Grants Advisory Committees are appointed with regard to our [Diversity, Access and Equity Policy](#) which is published on our website. Our nomination rounds are public and open to all, and our appointment process is assisted by a Nominations Advisory Group made up of sector organisation representatives. We also conduct targeted Assessor Recruitment Strategies when specific skills and diversity gaps are realised. Furthermore, Assessors do not represent an 'interest' when assessing against grant criteria and therefore the panels that read and score applications are assigned as per our [Assessor Assignment Protocol](#) which considers a range of factors including cultural and skills-based factors. We would find it more useful for future evaluations to consider and assess the adequacy of the skills of the assessors assigned to read and score applications.

On reflection, these missing pieces of context and complementary evidence could create division and amplify any preconceived perceptions of bias and dissatisfaction with the granting process. Without the context, readers of the report could draw inaccurate conclusions about the outcome of the granting processes and the CBF's decision-making and governance practices – such as that it has inappropriate biases and is not transparent or objective enough. The report therefore could be perceived as a negative reflection on the program, rather than the positive one we, and our government colleagues, believe it to be.

On the following pages you will find our response to the eleven recommendations provided within the report. In essence, we have no concerns with the recommendations posed but feel that these cannot realistically be addressed within the current funding envelope and funding line provisions.

Given our response, we look forward to the opportunity to hear the Department's view on the recommendations posed and whether some are considered more of a priority than others.

We would also welcome the opportunity to discuss how the funding lines within the Funding Deed could better represent and reflect the priorities as identified in Roadmap 2033.

⁵ Ibid, p. 50

Response to Recommendations

No.	SRC Recommendation	CBF Response
1.	Ensure awareness raising activities are undertaken regularly to build the sector’s understanding of the CBF offering, and the expectations and process associated with application. In particular, this should target, smaller organisations in regional areas and those experiencing organisational change.	Whilst we agree with this recommendation, we do need to balance this within the context of the available funding envelope. Whilst we would love to ensure that every licensed station is aware of us and applying for support when the need arises, we do need to be cautious about enticing new applicants into an already over-subscribed and highly competitive program. With that, the focus of our current awareness and training program is on existing applicants and the grant application expectations and process. Personnel turnover does impact on our ability to maintain and build strong sector knowledge of the CBF programs and processes however we will continue to factor further outreach into our Communications Plan so as to broaden our reach to stations.
2.	Continue investing in CBF staff outreach and engagement activities to continue building positive partnerships and support mechanisms for applicants. This may also include undertaking capacity building activities to help organisations to become ‘grant ready’.	We agree with this recommendation and will continue to develop our webinar training program and resource library targeting specific cohorts and regional workshops off the back of the release of Roadmap 2033. We will also continue to capitalise on sector conferences and events to engage with and raise awareness of the program amongst station representatives. We are also considering how we can run a ‘grant ready’ roadshow and do CBF collateral mailouts that continuously remind stations about who we are, what we do and how to contact us.
3.	Consider how to balance the varied capacity of organisations in the sector through the grant allocation process. This could include better identifying organisational capacity and resilience to target support, removing barriers around core operational funding, and greater prioritisation of funding which builds organisational resilience, staffing, infrastructure and community engagement.	Our grant objectives are already aligned to building capacity and resilience, however, due to the varying capacity levels across the sector, this is an ongoing challenge for us within the current funding envelope. As identified in Roadmap 2033, we will continue to work with sector organisations to build effective support programs that deliver resilience and sustainability across the sector and that grow our capability with the first step being the development of a workforce development strategy that ensures we have the rights skills and the right people in the right roles across the sector. We can review the application form further to provide different levels of funding application requirements however the challenge of funding core operational costs versus development ideas for resilience and sustainability will remain until more funding is made available.

4.	Streamline the application processes. Given year-by-year reliance on grants for many organisations, consider including a rolling application process whereby applicants seeking ongoing funding can apply to renew funding rather than submitting new applications. Sector Investment activities can be consolidated into single applications. Core operational funding could be detached from some of the requirements of other activities.	As noted in recommendation 3 we intend to look at the application process again for smaller operational grants but are reluctant to detach core operational costs from other activities as we feel that this would be a reversal of the 2016 restructure process. Whilst we acknowledge that some stations can't survive without support for core operational costs, we think there are some risks involved in a rolling application process as we feel that even if applications are for operational costs, applicants still need to be able to demonstrate outcomes and how the station is developing and contributing to the community – something we have just started to roll out with the outcomes engine in SmartyGrants. We also think an automatic renewal process is more akin to a subsidy model than a granting model and would like to know whether the Government is supportive of this approach. Sector Investment grants are in some instances rolled into single applications but yes there is further consolidation that could be undertaken, and which would further align sector investment processes with the outcomes-based granting and reporting model that we have in place through the Sector Investment grants program.
5.	Ensure sector representation is achieved in peer assessment process to build on equity and trust and involve professional assessors in sector-wide initiatives to bring adequate knowledge to bear and add value to the sector.	Assessors do not represent an 'interest' when assessing grants and are therefore allocated to assessment panels based on skills, experience and diversity factors as per our Assessor Assignment Protocol . Our CBF Assessor Pool is as diverse as the sector that we serve and we ensure this by recruiting our volunteer cohort in line with our Diversity, Access and Equity Policy . We regularly review the skills and diversity matrices of our volunteer committees in order to ensure inclusivity and representation of all parts of the sector and will consider bringing in professional expertise into the Sector Investment space on a case by case and as needs basis.
6.	Increase the sector's capacity to create accessible content by targeting funding to support production and delivery costs including training and staffing, community engagement and fundraising, diversification and online delivery and the consolidation and/or development of alternate revenue sources.	Our Development & Operations (D&O) grants program does allow for applications of this nature but it remains a challenge to support all applications within the current funding envelope. There may be some cause for considering more content production support costs within the Content program, but this may cause overlaps with the D&O program. There may also be some value in investigating further how to add more nuance to the process to more holistically consider the impact of applications that are successful in one grant program and not the other. This may be more achievable with longer term granting which is also hard to realise within the current funding envelope.

7.	Consider how the program can target funding to build resilience among applicants. The proposed resilience model that has already been endorsed by the CBF provides an opportunity to address this need by further embedding resilience principles in the CBP to align funding strategies with resilience building. This may also include a government review of legislative restrictions on sponsorship to help support sustainability in the sector.	We agree with this recommendation and have already embedded the Station Resilience model into the grant guidelines and the evaluation frameworks. We are in the process of reviewing these in line with the now completed Roadmap 2033, however the resilience model will remain a foundational piece of our grant programs moving forwards. While a government review of legislative restrictions on sponsorship is outside of CBF control, we understand that there are a range of perspectives relating to this proposal that are likely to be ventilated through the Government's consultation as a part of the Review into the Sustainability of Community Broadcasting.
8.	Target capacity building initiatives for staff and volunteers in less self-sufficient organisations and those in regional, rural and remote areas to address knowledge and skill shortages, including training and development through sector-wide initiatives.	We agree with this recommendation however as noted in our response to Recommendation 3 we feel this is broader than training and development programs. Roadmap 2033 has identified that the capacity issues across the sector can only be mitigated through the development of a workforce development strategy and ensuring that capacity across the sector is levelled out accordingly. Training is still a critical component to building and developing capacity across the sector and whilst our current training priorities do target the identified areas noted within the recommendation, training programs run by the CMTO are often very over-subscribed with greater need for investment in this area also required.
9.	Prioritise grants that build sustainability and self-sufficiency, including funding strategic initiatives that support sector coordination and partnerships, knowledge and skills sharing, and initiatives which reduce financial burden on individual stations.	We agree with this recommendation and it aligns with Roadmap 2033 and subsequently the CBF Board have recently decided on a realignment of the remit and focus of the Sector Investment Advisory Committee (SIAC). Moving forwards sector coordination activities of the mid-sized sector organisations will all be overseen by SIAC to ensure alignment to Roadmap 2033 and to ensure that synergies can be realised and gaps identified as well as opportunities for knowledge, skills and resource sharing more readily achieved across the sector for the benefit of member stations and the sector as a whole.
10.	Prioritise longer term funding opportunities to foster greater security in the sector, and	Whilst we agree with this recommendation in principle and it aligns with the priority relating to 'strategic and longer-term thinking' in our CBF Strategic Plan, we do struggle to balance longer-term funding opportunities within the current funding envelope which does not currently support the daily needs of the sector. The Grants Advisory Committees are reluctant to 'tie-up' funding in

	<p>support longer-term strategic thinking for organisations.</p>	<p>multi-year grants whilst the current funding provision is so competitive - and this reluctance, together with long-term under resourcing of the sector has, over time, contributed to an organisational practice of shorter-term granting. Multi-year funding investment needs further consideration with more fit-for-purpose guidelines, outcomes maps and reporting methods associated. Again however, it is difficult to set and manage expectations of this within the current funding envelope.</p>
11.	<p>Consider how sector-wide funding for key initiatives can better address and be responsive to the diversifying needs of the sector through partnership delivery models or greater distribution of funding across the sector, with intermediary bodies playing a key coordination role. Making funding available towards 'medium' sized sector projects would support this tiered approach to progressing strategic initiatives in a manner that is appropriate to different organisational capacities.</p>	<p>As per response to recommendation 9.</p>