

Comparison of Nous Group recommendations, CBAA positions and CBF positions

NOUS RECOMMENDATION	CBAA SUBMISSION	CBF POSITION
<p>Recommendation 1 <i>CBF should seek to reshape its current funding arrangements with DOC moving to a three-year funding deed and five simplified funding lines. These funding lines should be for General, Ethnic, RPH, Indigenous and Sector Projects.</i></p>	<p>The CBAA sees significant benefits with multi-year funding agreements but is concerned with the simplification of funding lines to the degree that is recommended in the Nous Report.</p> <p><u>Multiple Year Funding Deeds</u></p> <p>The CBAA strongly supports multiple year funding agreements between the CBF and the Department of Communication (“DOC”).</p> <p>The CBF has recently moved to a tri-annual funding deed (excluding the Digital Radio Project). The CBAA has for some time been advocating this change. Multiple year funding reduces administrative burden, provides longer-term stability and allows more effective planning and resource allocation.</p> <p>However, a three-year funding deed is still a relatively short period in the context of government funding, and we understand schemes managed by the DOC are moving to four, five or even six year arrangements. Over time the CBF should pursue further increases in the period of the funding deed beyond three years and should continue to pursue multi-year funding for the Digital Radio Project. It is noted that the Australia</p>	<p>Agreed in part (<i>with Nous</i>). Reshaped DOC funding arrangements will be beneficial. A three-year main funding agreement has been achieved. Separate funding lines with a common purpose should be summed into a single allocation where possible. Funding lines can be grouped under a General Sustainability and Development (GSD) Fund and discrete Specialist Funds; defined allocations will remain for the GSD Fund, for sector projects within the GSD Fund and for each specialist area. Current General, Transmission, Community Radio Satellite and Content Development CRCD funding allocations will form the remainder of the GSD Fund. Support for subsumed funding allocations will continue to be provided and reported on to government but levels of support provided may change. For example transmission equipment and support for transmission expenses will continue to be provided under Development Grants however the level of transmission expenses supported will be determined on a case by case basis and/ or via a published staged reduction over a number of years. Funds arising from this process will assist specific development initiatives such as multi-year station development grants.</p>

Council has recently announced six-year funding for arts organisations.

Multiple year funding to the CBAA, and where relevant, other SRO's and stations, should be implemented immediately.

Simplified Funding Lines

While some simplification of funding categories seems advisable, the CBAA is concerned about consolidation to the degree that is recommended in the Nous Report. It is essential in this area that the CBF undertake further close consultation with the CBAA and SROs beyond initial feedback on the review.

Section 2.2.3 of the Nous Report (p. 16) considers how the DOC's funding line structure restricts CBF's flexibility to respond to an emerging sector. This is a complex area that the CBAA is concerned is not given sufficient context in the Nous Report in terms of:

the role of political advocacy for specific funding purposes required in the sector;

the capacity for flexibility within funding lines in terms of CBF mechanisms regarding priorities and distribution of funding (or scope to increase flexibility within funding deeds with DOC);

longer term implications and impacts of reducing funding lines in terms of the risks of ending up with broad funding categories that disempower the sector's capacity to argue for maintaining funding or increased

	<p>funding in specific areas (i.e. supporting a government position that allocates \$xxx to a specific area and any and all development priorities then become the CBF/sector responsibility).</p> <p>The four headline categories of General, Ethnic, RPH and Indigenous could work if there were prescribed allocations within those categories so that distinctions were maintained in terms of a minimum of operational and content funding sub-categories across all four funding categories. In that structure, operational funding could include transmission.</p> <p>If those sub-categories were to be set by the CBF there must be a structured process for input from each relevant SRO that ensures a <u>role in decision making</u> rather than solely ‘consultation’, and the funding allocations must be prescribed in the funding deed so that advocacy can be maintained with government in at least those two primary areas. Without at least a basic distinction between station operational costs and content support, and given the scale and scarcity of resources in the sector, there is a risk that operational costs will eventually consume most available resources. Another option would be to have operational, transmission and content sub-categories.</p>	
<p>Recommendation 2 <i>CBF should seek ongoing funding for the Digital Radio Project, to be included in the Sector Projects funding line.</i></p>	<p>The CBAA supports the recommendation to seek ongoing funding for the Digital Radio Project (DRP). The CBAA will lead discussions with Government in this regard.</p> <p>The representation of DRP funding in the report is a</p>	<p>Not agreed (<i>with Nous</i>). In accordance with the CBAA’s advice, seeking inclusion of Digital Radio Project funding under the triennial Main Funding Deed is not considered strategically appropriate at this time.</p>

	<p>little confused (p24 and in other tables). On p16 the report notes the base level at \$2.28m (forward estimates from 2016) but in the report funding tables it seems to use a mixture of current funding (2013/14) and the CBAA estimate of \$4.1m for 2016/17. Though \$4.1m doesn't seem to be the basis of the table in 4.2 (p47).</p> <p>The fact that the forward estimates currently allocates \$2.28m for 2016/17 serves to highlight issues of simply rolling all sector projects together as the shortfall requires specific strategies to be pursued by the CBAA.</p>	
<p>Recommendation 3 <i>CBF should institute outcomes-based reporting through a basic SROI framework, responding to the objectives of CBF funders.</i></p>	<p>The CBAA supports the recommendation to institute outcomes-based reporting. It is widely recognised as best practice for granting activities to have an outcome orientation so that grant recipients focus on outcomes and outputs for beneficiaries.</p> <p>A small number of member stations have expressed concern regarding a move to outcome based reporting and their capacity to do so. Some of this concern is possibly related to the linkage of the SROI framework, which is a complex concept, to outcome-based measures. It is noted that they aren't depended on each other. The Social Return on Investment (SROI) framework would be one way to measure the achievement of some outcomes. It is also noted that this recommendation is contained among the "seeking funding" group of recommendations and as such is referring to how the CBF reports to the DOC, not necessarily how CBF grant recipients report to the CBF.</p> <p>CBAA agrees that a SROI framework (or other similar</p>	<p>Agreed in part (<i>with Nous</i>). The feasibility of employing a basic SROI framework requires further investigation. Initial research suggests that its applicability may be limited to large discrete funding programs where a clear alignment can be drawn between policy imperatives and the capacity of funding to effect change. Such an approach could be trialled with sector projects and relevant sector coordination grants. The consolidation of reporting on high level investment through the SIAC is expected to allow the Foundation to more tightly focus our strategic intent in order to produce greater sector benefit.</p>

	<p>type of framework) and analysis could contribute to a more outcome focused CBF approach to report requirements and is a direction that the sector needs to increasingly pursue in relation to both funding and advocacy. Measuring and demonstrating social value will require considerable research and case study support that is not currently well resourced in the sector and as such requires further assessment for implementation.</p> <p>It is noted that the CBAA has previously written to the CBF regarding the need to identify the social, environmental, and economic benefits generated by the community broadcasting sector and this will be further assessed as part of a review being undertaken by the CBAA of the sector’s current research efforts and needs.</p> <p>The CBAA is currently implementing “theory of change” methodology to plan and evaluate its various programs.</p>	
<p>Recommendation 4 <i>CBF should obtain DGR status and seek additional funding from private sources. CBF’s target should be \$2.5m over five years.</i></p>	<p>The CBAA has long felt that diversifying revenue streams should have been a higher priority for the CBF as it has always been part of the CBF constitution. It is productive to see this emphasised in the Nous Report. The Nous Report’s suggestion of a more ambitious target of \$2.5m over five years for the fundraising role already in process is appropriate. The current CBF target of \$1m over five years barely makes the pursuit worthwhile given costs and resources involved. It should be noted this is a complex and highly competitive area and the sector does not have a good track record in attracting private or corporate support</p>	<p>Agreed (<i>with Nous</i>). In Progress. Application for DGR listing by name within the Income Tax Assessment Act is under consideration by Treasury. Our application included letters of support from the Minister for Communications and most sector organisations. A fundraising target of \$2.5m. over five years is reflected in our Strategic Plan and the implementation of our Fundraising Development Project (FDP). The FDP is being funded from CBF reserves. The CBF also intends to provide assistance to stations and sector organisations who wish to achieve DGR status themselves. This additional funding will complement</p>

	<p>at a sector-wide level. There are also inherent conflicts and it is essential that the CBF consults with the CBAA, SROs and stations to minimise competition for limited funding.</p> <p>In seeking feedback on the review it has become clear that there is widespread confusion and unnecessary concern regarding the CBF's fundraising ambitions and communication of the CBF Boards plans to SROs and stations would be beneficial in the short-term.</p>	<p>current Australian Government funding.</p>
<p>Recommendation 5 <i>CBF should set up a low-cost online fundraising platform allowing donors to donate to the CBF, SROs or individual stations.</i></p>	<p>The focus of the CBF must continue to be on funding and, while there are overlaps, the CBF role should not extend to initiating projects or project management such as an online fundraising platforms for individual stations or SROs. Service provision is the responsibility of the CBAA and other SROs. There are many third party online funding platforms available that could be set up relatively easily, however, further consultation would need to occur around how any donations are distributed based upon donor's desires, etc.</p> <p>Other models/roles for the CBF could be explored, for example concepts similar to the <u>Australia Cultural Fund</u> managed by Creative Partnerships Australia or the <u>Australian Sports Foundation</u> managed by the Australian Sports Commission.</p> <p>The CBAA is currently scoping, with the support of OGAC, a radio station website service. It is anticipated that websites produced through this service will have capacity to accept donations from donors. A pilot project is being deployed with Mountain District Radio and the site is now live at <u>www.3MDR.com</u>. The current</p>	<p>Agreed (<i>with Nous</i>). Mixed sector responses received to this recommendation were noted. The CBF will not cut across sector activity in seeking donations but rather support and supplement its online capacity to do so. Participation by the sector will be voluntary - consenting stations and sector organisations only. Donations received will be made available for general sector benefit or be allocated as per donor preferences.</p>

	<p>site accepts listener subscriptions but not direct donations at this time</p>	
<p>Recommendation 6 <i>CBF should consider coordinated sponsorship packages offering high value potential partners publicity across a wide network of community broadcasters and platforms. Stations should have the ability to opt in or opt out of such arrangements.</i></p>	<p>The concept of sector-wide ‘sponsorship packages’ is especially complex and the CBAA does not believe this is a workable approach for the CBF.</p> <p>It is also noted that there are a number of agencies that represent various parts of the sector to government, business, media buyers and other agencies. For example, Spots and Space and 4PeopleMedia. Hope Media also acts on behalf of various Christian Media and a feasibility study will commence shortly on behalf of a group of West Australian based stations. It is a highly competitive and resource intensive area.</p> <p>Coordinated sponsorship packaging would be resource intensive and complex to operate and is unlikely to be successful financially – it would be more effective to pursue strategies in collaboration with the CBAA to support stations to more effectively harness sponsorship revenue.</p> <p>The CBAA will be conducting a series of 3-4 webinars in the first few months of 2015 to assist stations with their sponsorship strategies.</p>	<p>Not agreed (<i>with Nous</i>). The CBF will not set up a sponsorship agency in competition with existing companies that offer this service to stations. However, it was noted that opportunities will present themselves through the CBF’s Fundraising Development Project that may involve corporate partnerships and the CBF will need to be open to such possible “sponsorships”. The CBF will develop a policy in relation to the ethical restrictions bounding its acceptance of corporate sponsorship and donations. Given the diversity of the sector it is expected that there will be a spectrum of views on such matters. As independent organisations stations and sector organisations have complete control over what support they wish to accept.</p>
<p>Recommendation 7 <i>General grants (Operations and Content Innovation) should only be available to stations that do not receive their core support through the Ethnic, RPH or Indigenous funding line, noting that any station may apply for “emergency funding” through the General funding line if</i></p>	<p>Section 2.2.5 of the Nous Report points out disparities in funding allocations. Competitive grant structures will always create ‘winners and losers’. The recommended revised structures and funding allocations may not result in much change in this regard.</p> <p>The model proposed in the Nous Report is just one model that could be considered to address disparities in funding allocations. The CBAA recommends that other</p>	<p>Not agreed (<i>with Nous</i>). It is more equitable to allow all stations to access general funding. Universal access to this general funding line may assist the CBF in effecting a tighter focus of its strategic intent through higher value grants or the broad adoption of specific new infrastructure. No station should be restricted from accessing new funds made available through CBF fundraising efforts.</p>

the station's viability is immediately threatened.

models be explored by the CBF in consultation with the CBAA and other stakeholders. It is important to acknowledge that the community broadcasting sector has a culture of collaboration between stations irrespective of their community of interest and any models established should ensure that this culture is continued to be fostered.

The Nous Report's recommendation to no longer have Ethnic, RPH and Indigenous station eligibility to any area of general funding would increase general funding support. It is interesting that the Nous Report does not provide a breakdown of station categories or at any stage refer to general stations (or more accurately stations that are not licensed as Ethnic, Indigenous, RPH) constituting close to 70% of the sector (excluding RIBS).

The term 'innovation' is not particularly useful for broad content categories and increases barriers for small and regional stations. It implies all content has to be 'new' and 'innovative' rather than encouraging stations to apply for content support. It would be more productive to classify content grants under 'content support' with grant guidelines supporting quality and innovative content.

Recommendation 8
Ethnic Public Good Subsidy grants (to be paid at a specified hourly rate) and Ethnic Content Innovation grants should be available to all stations for the production of Ethnic

The concept of setting hourly rates in advance seems likely to be constructive for station planning and also likely to introduce an element of competitive grant allocations in the applicable areas (though it may also produce a surplus).

8-11
Not agreed (*with Nous*). (recommendations 8-11). Creating further funding silos is not supported. Specialist funding should be grouped as separate aspects of Content and Development funding overseen by the Content GAC (CGAC) and Development GAC

<p><i>content, irrespective of their licence.</i></p>	<p>There needs to be a clear and transparent process for the allocation of any excess funds not provided to stations as part of any grant round.</p>	<p>(DGAC) (refer Section 3 below for further details). A new model should be more transparent about what funds support service operation and what supports content production. A new model should address the shortcomings and inequities that can occur when funding is provided to stations via an arbitrary hourly rate based on a “cutting up of the pie”. The recent introduction of differential rates to Ethnic Program grants as a means of better supporting content production from and for new and emerging communities, and the extension of ethnic language programming in non-metro areas, is acknowledged as a progressive change in specialist content funding distribution. The new model should similarly recognise that funding levels reflect the differing resource requirements of particular communities and the desirability of extending ethnic language programming</p>
<p>Recommendation 9 <i>RPH Public Good Subsidy grants (to be paid at a specified hourly rate) and RPH Content Innovation grants should be available to all stations for the production of RPH content, irrespective of their licence.</i></p>	<p>The concept of setting hourly rates in advance seems likely to be constructive for station planning and also likely to introduce an element of competitive grant allocations in the applicable areas (though it may also produce a surplus).</p> <p>There needs to be a clear and transparent process for the allocation of any excess funds not provided to stations as part of any grant round.</p>	<p>Above</p>
<p>Recommendation 10 <i>Indigenous Public Good Subsidy grants (to be paid at a specified hourly rate) should be available to all stations for the production of</i></p>	<p>The concept of setting hourly rates in advance seems likely to be constructive for station planning and also likely to introduce an element of competitive grant allocations in the applicable areas (though it may also produce a surplus).</p>	<p>Above</p>

<p><i>Indigenous content, except those that receive their core operational support through another federal government program. Indigenous Content Innovation grants should be available to all stations for the production of Indigenous content, irrespective of their licence and other funding streams they may access.</i></p>	<p>There needs to be a clear and transparent process for the allocation of any excess funds not provided to stations as part of any grant round.</p>	
<p>Recommendation 11 <i>Public Good Subsidy grants should be paid at a fixed hourly rate up to a maximum total number of hours, agreed on a per-round basis, for each category to which they apply (currently ethnic, Indigenous and RPH).</i></p>	<p>The concept of setting hourly rates in advance is likely to be constructive for station planning and also likely to introduce an element of competitive grant allocations in the applicable areas (though it may also produce a surplus).</p> <p>There needs to be a clear and transparent process for the allocation of any excess funds not provided to stations as part of any grant round.</p>	<p>Above</p>
<p>Recommendation 12 <i>All grants should be platform neutral, available to both radio and TV stations and to fund content produced for any platform.</i></p>	<p>The CBAA has not supported the ‘platform neutral’ terminology in previous submissions or in its response to the Convergence Review which used the term heavily.</p> <p>In common usage it tends to imply a simplistic version of content production that implies content can simply be produced in a single form and delivered across multiple platforms. The term ‘multi-platform’ more accurately describes the specific forms of content production and preparation required for various</p>	<p>Largely agreed (<i>with Nous</i>). Most funding opportunities will not be platform specific. Funding should be available to support both community radio and television and related distribution platforms. Funding conditions should not impede stations from producing content for distribution on any platform that is relevant to their audience. A dedicated funding allocation for the support of community television (CTV) remains a goal for the CBF. The CBF will integrate the support for CTV into all non-radio specific funding programs in the interim. Careful consideration of content funding</p>

	<p>delivery platforms and audience and consumption patterns.</p> <p>We recommend that the CBF support the CBAA approach and cease using the ‘platform neutral’ terminology.</p> <p>It is noted that the positions for community radio and television are increasingly divergent and the Nous Report was completed prior to recent announcements regarding community television spectrum allocations. It has historically been CBAA’s position that new funding should be obtained to fund Community Television rather than further diluting the already scarce resources available to community radio.</p>	<p>assessor skill-sets and GAC membership will be necessary to ensure that non-radio content creators receive fair and equitable consideration. This proposal does not open funding opportunities up to all online media entities, allocations will still be made within the community broadcasting framework (which is under active development in the TV area).</p>
<p>Recommendation 13 <i>Stations can put in one application covering all categories per funding round, with two funding rounds per year.</i></p>	<p>In conversations with stations the CBAA has identified a diversity of views regarding this recommendation. The proposal poses opportunities as well as some issues and risks that need to be more accurately identified. There is particular concern that bigger, more resourced stations, and stations skilled in grant writing may be advantaged in this system. Further research and discussion is required.</p>	<p>Agreed in part (<i>with Nous</i>). The CBF wants to simplify its processes. The number of grant rounds should be minimised – the proposal is for two grant rounds each year. These will be set out against an annual calendar to give applicants certainty and facilitate more effective planning. The number of applications per round for stations is expected to be reduced to one or two – a Content application if they are seeking content support, and a Development application if they are seeking service support, salary subsidies, equipment, training or transmission expenses. Other changes, such as transparent multi-year funding to support station development based on thorough strategic & business planning, may provide a further dimension to the application process as our capacity to support such development increases. Access to grants processes out of the usual grant round timeframe will continue to be</p>

		made available to stations in crisis due to circumstances out of their control (eg. natural disaster)
<p>Recommendation 14 <i>CBF should invest in building station capability to write grant applications, through activities conducted by CBF Secretariat staff and CMTO. This should include the development of recommended ideas to provide stations with inspiration in their grant applications.</i></p>	<p>The CBF should work with the CBAA, training organisations and other SROs to build station capability to write grant applications. This will be especially important with a move to outcome-based reporting.</p>	<p>Agreed (<i>with Nous</i>). This activity is already embedded in our current Strategic Plan (refer Objective 1.2). The CBF supports achievement of this objective through presenting workshops at sector conferences, provision of access to specialist grant seeking materials and advice, webinars etc. However the level of CBF resources allocated to such activities could be increased, and the CBF could work in partnership with the CBAA, the CMTO and others to further build station capacity. As a part of the rollout of the proposed changes to CBF grants, the CBF will offer stations funding opportunities to support the development of strategic & business plans. Completing such planning will strengthen their funding requests to the CBF and to other funders.</p>
<p>Recommendation 15 <i>The CBF Board should allocate sector advancement funding to SROs advancing the interests of a particular sector area on a three-year basis. The funding should be used to deliver on a series of outcomes agreed by the SRO and CBF.</i></p>	<p>The CBAA supports the recommendation to institute outcomes-based reporting. It is widely recognised as best practice for granting activities to have an outcome orientation so that grant recipients focus on outcomes and outputs for beneficiaries. It is appropriate to highlight the need for strong and clear outcomes for funding to sector representative organisations.</p> <p>Some changes to the GAC role in allocating sector advancement funding (currently sector coordination funding) to a more centralised CBF role has merit, particularly for the CBAA.</p> <p>The CBAA has a unique relationship with the CBF in the sense that it receives more funding than any other</p>	<p>Agreed (<i>with Nous</i>). Triennial funding should be instituted for sector projects and sector coordination. Outcomes-based applications/reporting is also supported on a trial basis (refer to section E. 5 above). Any triennial funding offered should be bound by the same conditions in relation to funding curtailment attached to the CBF's triennial funding agreement.</p>

organisation, principally due to the fact we manage three sector projects and more specifically the sheer number of grants that are awarded to the CBAA.

Whilst current structures require this to occur it is not efficient or effective. As an example, four different grant applications to two different GACs were required in relation to the recent establishment of the content distribution hub at the CBAA for the transition to the VAST satellite. It would have been far more effective to develop one project plan assessed through an appropriate centralised process.

The current decentralised nature of decision making has other issues. As an example, recently the CBAA's Technical Advisor, David Sice gave an extensive briefing to the CBF Board on digital development issues. However, the funding decision for which this understanding is required is made at GAC level.

This highlights one of the 'structural' deficits in information flow on whole-of-sector development issues within CBF processes, and will not necessarily be improved by any of the mechanisms outlined in the Nous Report in terms of funding decisions. In fact, rotating 'assessment panels' could reduce understandings on whole-of-sector development issues. This issue needs considerable consideration and discussion.

CBF systems and structures have a significant impact on CBAA operations and are regularly a considerable source of frustration to the CBAA. Changes are critical if CBAA is to be able to effectively deliver outcomes of

benefit to the sector.

The CBAA recommends that the following changes are made:

Reporting on sector advancement funding should be outcomes-based.

Reporting by the CBAA to the CBF on Sector advancement and Sector Project funding should be done once per year (as recommended by the Nous Group) not quarterly as has been the case.

Multiple year funding agreements should be implemented. Multiple year funding reduces administrative burden, provides longer-term stability and allows more effective planning and resource allocation. Agreements should preferably be for a minimum of a four-year period. It is noted that the Australia Council has recently announced six-year funding for arts organisations.

CBAA to submit one consolidated application in March/April 2015 covering Sector Coordination and all Sector Project funding.

Given the complexity of funding arrangements between the CBAA and the CBF, the CBAA is extremely keen to put in place revised arrangements for 2015/16.

The Nous Report opens up the possibility of additional organisations receiving sector advancement funding. Whilst from time to time there may be legitimate reasons for new Sector Representative Organisations to

	<p>be formed some criteria should be developed to ensure unnecessary proliferation of new organisations doesn't occur and that any new organisation has appropriate legitimacy and meet minimum governance requirements.</p>	
<p>Recommendation 16 <i>The CBF Secretariat, on behalf of the CBF Board, CBF should monitor sector advancement funding annually on an outcomes basis.</i></p>	<p>The CBAA supports this recommendation. It is widely recognised as best practice for granting activities to have an outcome orientation so that grant recipients focus on outcomes and outputs for beneficiaries.</p> <p>The CBAA has already commenced implementing “theory of change” methodology to plan and evaluate its various programs.</p>	<p>Not agreed (<i>with Nous</i>). We believe that there should be peerbased oversight of both sector coordination and sector projects, however we think processes could be streamlined from current methods. It is proposed that these funding areas be monitored by the Sector Investment Advisory Committee.</p>
<p>Recommendation 17 <i>CBF should move over time towards a model where sector projects are commissioned through a public request for quotation made available to SROs, stations and external organisations.</i></p>	<p>The CBAA does not support a ‘blanket’ approach to ‘projects’ being commissioned through a public request for quotation made available to SROs, stations and external organisations.</p> <p>In terms of current sector-wide projects:</p> <p>The Nous Report suggests that the Digital Radio Project is less appropriate to an RFQ process due to its political nature. The CBAA agrees.</p> <p>The Nous Report suggests that training is not appropriate for an RFQ process as it is delivered through the CMTO; a specifically structured autonomous organisation. The CBAA agrees though notes that if some of the Nous Group recommendations were implemented in earlier years then training may still</p>	<p>Agreed in part (<i>with Nous</i>). We don't believe there is a strong enough argument to implement this change for existing projects. Future sector projects may be commissioned in this manner if considered appropriate.</p>

be delivered by the CBAA.

CBOnline is a segmented project. It would be difficult to manage outside of the CBAA role. The National Listener Survey for example is a shared cost project amongst a number of stations across a variety of sub-sectors.

Amrap has been conducted effectively for many years by the CBAA. Significant infrastructure and resources have been allocated to its development. It is noted that the CBAA contributed considerable funds from its reserves to continue its operations during the recent funding crisis.

An RFQ process could be considered for any new national projects or where a current provider is not meeting the requirements of the project. Sector representative organisations should be given priority, and possibly a first right of refusal to maximise stability and efficiency and foster skills within the sector. There are also considerable intellectual property issues that need to be considered as well as integration between various projects.

The Nous Report states that 'The CBF Board should determine which sector projects it would like to prioritise and the funding levels for each, within the overall total DOC allocation for sector projects. It should consult with the sector via the Sector Roundtable in this planning phase.' The CBAA strongly disagrees with this approach - it is noted that it would be highly unlikely that the sector would be involved in Digital Radio if this process was in place in the past. It is also noted that it is inappropriate for the Sector

	<p>Roundtable to be the primary consultation mechanism for the CBF.</p> <p>The focus of the CBF must continue to be on funding and, while there are overlaps, the CBF role should not extend to initiating projects or project management, nor to commentary, analysis or recommendations about broader sector or industry strategy issues. This is a role for the CBAA and SROs.</p> <p>The comments under Recommendation 15 related to recommended changes also apply to this recommendation.</p>	
<p>Recommendation 18 <i>The CBF Secretariat, on behalf of the CBF Board, should monitor sector projects annually on an outcomes basis.</i></p>	<p>The CBAA supports this recommendation. It is widely recognised as best practice for granting activities to have an outcome orientation so that grant recipients focus on outcomes and outputs for beneficiaries.</p>	<p>Not agreed (<i>with Nous</i>). We believe that there should be peerbased oversight of both sector coordination and sector projects, however we think processes could be streamlined from current methods. It is proposed that these funding areas be monitored by the Sector Investment Advisory Committee.</p>
<p>Recommendation 19 <i>CBF Board members should be appointed for two year terms, serving no more than three consecutive terms.</i></p>	<p>Good organisational practice suggests that any Board should have a staggered rotation system for Board members, with a maximum term in office of between six and 10 years to encourage Board renewal while retaining corporate memory. As a guideline, good practice is for around one third of the Board to retire each year, noting that retiring Directors are able to seek re-election within term limits. Terms for Directors should be two or three years before re-election, with the ability to be re-appointed up to the maximum term.</p> <p>By imposing a maximum period of consecutive service</p>	<p>Not agreed (<i>with Nous</i>). CBF Board members should be appointed for up to three year terms, serving no more than three consecutive terms. Experience suggests that three year terms are optimal in terms of effective contribution. Opportunity for re-appointment on more than a single occasion has contributed to stability and consistency of governance. Appointments should be staggered to ensure regular renewal while retaining institutional memory</p>

	<p>and by staggering Board member terms it ensures that an appropriate balance between fresh talent coming onto the board and the continuity of appropriate knowledge, skills and experience on the board, as well as continuity on organisation and Board-specific issues is achieved.</p> <p>Two year terms for Board members are common in many not for profit organisations. The CBAA feels that a two year term would be appropriate for the CBF Board, though a three year terms could be considered. One year terms are too short and would not allow a Board member to contribute effectively.</p> <p>Maximum terms are now very common in not for profit organisations and serving no more than eight to nine years would be appropriate.</p>	
<p>Recommendation 20 <i>The CBF Board should be appointed by the outgoing Board against a skills matrix, from candidates nominated by sector stations and SROs. Each station and SRO can nominate up to two candidates. Five Board directors should be selected from the pool of nominated candidates, with at least four to have demonstrated community broadcasting experience. The Board should contain individuals with community broadcasting experience from a variety of different parts of</i></p>	<p>It is important that Boards are comprised of members with a variety of skills and experience and who act in the best interests of the organisation as a whole.</p> <p>The CBAA makes the following observations in relation to the recommended Board structure:</p> <p>The proposed structure would allow a Board of five persons. A Board of this size is regarded as very small. Seven or eight would be a preferable total number and as such the CBAA is considering that the two co-opted roles could be a requirement (rather than an optional 'up to two co-opted roles').</p> <p>The Nous Report recommends that the President is</p>	<p>Agreed in part (<i>with Nous</i>). Board members will be appointed against a skills matrix and diversity policy, with candidates nominated by sector stations and sector organisations. Each sector organisation or station can nominate up to two candidates. The Board will be comprised of up to nine members: • The President is nominated by the CBAA; • Five nominees will be selected from this candidate pool; and • The Board can co-opt up to three independent Directors to fill skills gaps. Appointing Board members against a skills matrix will bring the CBF into line with good governance practices. The proposed skills matrix against which Board members will be appointed includes: community broadcasting knowledge and experience, leadership & governance, legal, finance, strategic thinking,</p>

the sector.

appointed by the incoming CBF Board. Over many years, the CBAA has nominated independent individuals to the CBF for the CBF Board to appoint as President and this has been widely regarded as a positive and effective process. Given the broader representational role played by the CBF President, the CBAA considers that the existing CBAA nomination role (in consultation with other SROs) should remain in place resulting in a total of eight Directors, or alternatively four rather than five could be selected from the pool of nominated candidates.

Whilst there are many examples of successful Boards in the not for profit sector where outgoing Directors appoint incoming Directors the CBAA does not support that model in this circumstance. To ensure that the CBF Board is comprised of members with a variety of skills and experience and who act in the best interests of the organisation as a whole, a Nominations Committee could be formed with 3-5 people which may be a combination of CBF Directors and external appointments. The process should:

Utilise a skills matrix to guide appointments;
Consider the diversity of the Board including gender and other demographic elements;
Include appropriate involvement of the CBAA and other sector representative organisations. The majority of nominations committee members should be independent from existing CBF Board members.

On page 37, the Nous Report recommends the

community engagement, technical expertise and fundraising.

	<p>establishment of four board committees. The CBAA considers that the 'risk and audit' function may be better positioned with finance and that a committee related to media and broadcast issues, which is not currently covered, should be established.</p>	
<p>Recommendation 21 <i>All Board positions should be open for nominations every two years. Existing Board members who have not served three consecutive terms may re-apply. To balance continuity with regular refreshing of the Board, at least 2 Board members must not seek reappointment.</i></p>	<p>Board terms should be staggered so that a third to a half of Board members complete their terms in a given year.</p> <p>The CBAA supports a maximum period of service of three consecutive terms.</p> <p>By imposing a maximum period of consecutive service and by staggering Board member terms in this way, it ensures that an appropriate balance between fresh talent coming onto the Board and the continuity of appropriate knowledge, skills and experience on the board, as well as continuity on organisation and Board-specific issues is achieved.</p>	<p>Not agreed (<i>with Nous</i>). Regular refreshment to occur through staggering the terms of initial appointments.</p>
<p>Recommendation 22 <i>The incoming Board should appoint the President, Vice-President and Treasurer.</i></p>	<p>The CBAA does not support the recommendation that the President be appointed by the incoming Board. See observations under Recommendation 20 above.</p> <p>The CBAA supports the appointment of the Vice-President by the Board of Directors from amongst the appointed Directors.</p>	<p>Agreed in part (<i>with Nous</i>). The CBAA should continue to nominate the CBF President with appointment subject to Board approval. The Board should appoint the Vice-President and Treasurer.</p>
<p>Recommendation 23</p>	<p>All Boards should have a clear process to determine the</p>	<p>Agreed in part (<i>with Nous</i>). The Board will co-opt up to</p>

<p><i>The incoming Board can co-opt up to two Directors to fill skills matrix gaps. Co-opted Directors do not need to be nominated by stations or SROs.</i></p>	<p>skills mix of Directors required to carry out its governance role at a point in time. The Board should determine the skills of elected Directors and map them to the skills mix required, thus identifying gaps. It is good practice for a Board to have the ability to appoint Independent Directors to address gaps.</p> <p>As mentioned previously, the CBAA considers that a Board of five Directors is too small. Seven or eight is a preferable total number and as such the two co-opted roles could be a requirement (rather than an optional 'up to two co-opted roles').</p>	<p>three independent Directors to fill skill gaps. Co-opted Directors will not be nominated by stations or SROs.</p>
<p>Recommendation 24 <i>At least one Director must be Indigenous.</i></p>	<p>There is good evidence that diversity on Boards leads to better performance. The Board appointment process must consider the diversity of the Board including Indigenous and other demographic elements.</p>	<p>Not agreed (<i>with Nous</i>). While diversity is highly valued by the CBF, marginalised communities of all types should be strongly encouraged to actively participate in community broadcasting and by extension in the Foundation's operation at all levels. Board members will be appointed on merit, and consistent with a diversity policy</p>
<p>Recommendation 25 <i>CBF should form assessor pools every two years from candidates nominated by sector stations and SROs. Each station and SRO may nominate up to 5 candidates. Appointment to the pool should be based on the individual's skills and community broadcasting experience, as well as diversity considerations including adequate representation of women and young people.</i></p>	<p>The CBAA agrees that the GAC process requires some revision and the assessment panel structure could be a reasonable framework to replace the current GAC structures. Broadening the nomination base would be a constructive move for assessment pools but it would also be productive to retain some role for SRO nominated processes.</p> <p>One option to integrate both processes would be for the assessment panel Chair to be nominated by the relevant SRO.</p>	<p>Agreed in part (<i>with Nous</i>). The peer review panels called Grants Advisory Committees should be retained under a simplified structure. Where workload or skill requirements dictate, grant assessment may involve additional assessors drawn from a suitably skilled pool. There are fundamental differences in the skill sets required by assessors of Content grants and other grants. The CBF will need to define skill sets that will ensure effective assessment of all applications.</p>

	<p>The CBAA has concerns that the proposal for CBF Grants Administrators to take a non-voting Chair role would potentially interfere with their role in supporting and advising grant applicants and in their capacity to support assessment processes and panels.</p> <p>More discussion and consideration should occur in relation to specific details of the assessor pool structure.</p>	
<p>Recommendation 26 <i>Assessor pool members have a two year term limit and may serve up to three consecutive terms. The assessor pools should have 14 general, 10 ethnic, 10 RPH and 10 Indigenous sector representatives.</i></p>	<p>The CBAA sees merit in this recommendation. More discussion and consideration should occur in relation to specific details of the assessor pool structure.</p>	<p>The Board will appoint the assessor pool. The assessor pool model will enable more experienced community broadcasters to participate in the work of the Foundation. There are many appropriately skilled people in the sector that can help to assess grant applications. The assessor pool is internal to the CBF – an extension of its structure. Nominations for the GAC and broader assessor pool will be received via a public open nomination process, but candidates may be endorsed by a station or sector organisations. It is probable that an endorsement from a sector representative organisation will carry particular weight. Appointments will be made based on the individual's skills and community broadcasting experience, as well as diversity considerations including representation of women and young people. Candidates with suitable skills will be appointed to the assessor pool and serve on assessor panels relevant to their skill base. The strongest candidates will receive positions on the GAC. GAC members and assessors serve a two-year term in accordance with current practice and may serve up to three consecutive terms. GACs will consist of a minimum of 3 and a maximum of</p>

		7 members. It is expected that between 80 - 100 people will be appointed to the Assessor Pool. CBF staff members will service each GAC.
<p>Recommendation 27 <i>Two grant rounds should be convened per year. Assessment panels will be formed for each round from a subset of the assessor pools by the relevant CBF grants administrator, who will also serve as the non-voting chair. The panels should include seven general, five ethnic, five RPH and five Indigenous sector representatives. For the ethnic, RPH and Indigenous panels, if it is not possible to find five panel members, a three person panel should be appointed. Pool members not selected for a panel for a given grant round will have no role in that round.</i></p>	<p>The CBAA sees merit in this recommendation. More discussion and consideration should occur in relation to specific details of the assessor pool structure.</p> <p>There is significant potential that 'assessment panels' could reduce understandings on whole-of-sector development issues. Further discussion and consultation needs to occur to ensure this and other issues are addressed in the implementation of any new system.</p>	<p>Agreed in part (<i>with Nous</i>). We want to simplify our processes. There will be a maximum of 2 funding rounds per year. Applicants will be able to apply for full year's funding in the first round, and where possible, multi-year funding. Unsuccessful applicants will be given the opportunity to reapply in the second round for funding through to the next full year's funding round, and all applicants can apply for new Content projects in the second round.</p>
<p>Recommendation 28 <i>An assessor may only sit on a maximum of three rounds per term.</i></p>	<p>The CBAA sees merit in this recommendation.</p>	<p>Not agreed (<i>with Nous</i>). Consolidating experience in assessment processes is felt to be more valuable than rotation of panel members.</p>
<p>Recommendation 29 <i>Grants should be assessed using an online system and confirmed over a</i></p>	<p>The CBAA sees merit in this recommendation.</p>	<p>Agreed in part (<i>with Nous</i>). Grants should be assessed using the CBF's online grant management system. GAC travel and accommodation expenses should be met</p>

<p><i>single weekend, with all panels meeting at a single venue. Attendance should be subsidised by the CBF where possible as part of the CBF's administrative levy from each funding line.</i></p>		<p>from the CBF's administrative levy drawn from each funding allocation. Confirmation of funding recommendations over a single weekend at a single venue not agreed to as logistically impractical although the benefits of Advisory committees interacting through aligned meetings will be considered.</p>
<p>Recommendation 30 <i>The CBF Senior Grants Administrator role should transition to a Senior Administrator - Sector Engagement role. This role should cover responsibility for shaping and measuring outcomes of sector projects and sector advancement funding on behalf of the Board.</i></p>	<p>The CBAA sees merit in this recommendation. Shaping of outcomes must be undertaken in close consultation with the CBAA and other SROs.</p>	<p>Not Agreed (<i>with Nous</i>). The Nous recommendation suggests a role for the Senior Grants Administrator (SGA) that should be undertaken by the SIAC. Under the proposed model the SIAC will be supported by the SGA allowing communication with the CBF Secretariat for sector coordination and sector projects to be dealt with by a single executive level employee.</p>
<p>Recommendation 31 <i>The CBF Secretariat should have different grants administrators aligned to General, Ethnic, Indigenous and RPH grants. This will allow grants administrators to assemble and chair bi-annual panels related to these grants. All grants administrators should contribute to the administration of other grants as required, acknowledging that the largest workload will be in General grants administration.</i></p>	<p>The CBAA has concerns that the proposal for CBF Grants Administrators to take a non-voting Chair role would potentially interfere with their role in supporting and advising grant applicants and in their capacity to support assessment processes and panels.</p>	<p>Not Agreed (<i>with Nous</i>). It is not appropriate for Grant Administrators to chair Grants Advisory Committees or assessor panels.</p>

<p>Recommendation 32 <i>The CBF Secretariat should appoint a fundraising manager to support the Board in diversifying funding sources.</i></p>	<p>The CBAA sees merit in this recommendation.</p>	<p>Agreed (<i>with Nous</i>). Already completed in early 2014 through the appointment of an additional Director with a Fundraising Development portfolio and the framing of the Fundraising Development Project. A Fundraising Executive was appointed to the Secretariat in February, 2015.</p>
<p>Recommendation 33 <i>The CBF Secretariat should aspire to appoint a grants administrator who identifies as Indigenous to manage Indigenous grants.</i></p>	<p>The CBAA sees merit in this recommendation.</p>	<p>Agreed in part (<i>with Nous</i>). The CBF Secretariat should aspire to appoint a grants administrator who identifies as Indigenous to support Indigenous applicants and assessors. The CBF has a longstanding practice of encouraging Indigenous people to apply for all CBF vacancies.</p>
<p>Recommendation 34 <i>CBF should continue to work with the Indigenous broadcasting sector to determine what role CBF should play in future distribution of Indigenous funding.</i></p>	<p>The CBAA supports this recommendation.</p>	<p>Agreed (<i>with Nous</i>). However the CBF should not make any decision relating to the role it should play in future distribution of Indigenous funding until there is greater clarity around how the introduction of the Indigenous Advancement Strategy funding scheme will play out for the Indigenous sector</p>