

SBS Radio Consultation

Large languages criteria:

FECCA has concerns about the sole reliance on Census data to determine large language provision. Traditionally, CALD communities are at risk of being underrepresented in Census data because of social, cultural and linguistic barriers to participation in a national Census. The insufficiency of information and support for people whose first language is not English, following the major failure of the 2016 Census website, further compounds the risk of CALD under-representation in the data.

The 2016 Australian Census has drawn criticism around privacy and the integrity of the data obtained. Electronic Frontiers Australia reported that people may have avoided participating, or provided misleading information, because of concerns over the collection and retention of information. EFA highlight that, even on a relatively small scale, acts of civil disobedience with regard to the census could seriously skew the data¹.

FECCA strongly recommends, that in addition to Census data, a review be undertaken that takes into account community views and critiques of the 2016 Census results, to ensure that selection of large language provision accurately reflects need and population.

FECCA congratulates SBS on their Arabic 24 Service.

High needs languages criteria:

FECCA commends SBS on their weighting system in determining high needs language radio services. In particular, the recognition and weighting of English language proficiency and ageing ensure that communities with high needs will be appropriately recognised through these criteria.

FECCA would like to receive more details on how English proficiency is measured within a community. In particular, FECCA highlights issues around loss of English language capacity, and a return to mother tongue, among CALD individuals suffering from dementia or other cognitive impairments in old age. This issue must be given consideration in data collected on English language capacity. It is particularly relevant to SBS Radio provision given the importance of radio for informing older CALD Australians.

As noted above, issues surrounding the 2016 Census should be acknowledged and accounted for when assessing population size of individual communities in the high needs criteria.

¹ <https://www.efa.org.au/privacy/census-2016/>

Inclusion via special criteria:

FECCA extends its full support for the SBS Radio inclusion via special criteria proposal.

FECCA would be interested to receive further details of the methodology for analysing the factors determining inclusion of languages via special criteria.

Consideration should be given to special criteria relating to particular groups *within* ethnic communities with specific needs including women, youth at risk or men with high levels of unemployment and exclusion.

Additional Feedback

FECCA would ask SBS to consider the following guiding principles when making final decisions to determine which languages are served by SBS Radio:

1. The objectives of ethnic broadcasting must be to:
 - provide a broad range of information about government and community services to Australia's ethnic communities
 - Provide communities and individuals with a broad range of settlement information
 - Provide cultural maintenance and development
 - Provide language maintenance
 - Provide news
 - Build communities
 - Promote, strengthen and recognise multiculturalism and diversity.
2. Proportionality of population should never be the only factor in determining language broadcasting—the value to a community of the radio service must also be of high importance. Notwithstanding our concerns detailed above, FECCA believes that the SBS criteria for language inclusion appropriately acknowledge this point.
3. FECCA notes that the way in which those services will be delivered will be determined in 2017 by SBS. FECCA suggests that a further consultation be undertaken. Digital literacy varies depending on the population. Some people come with no experience using computers, the internet and digital technology—for example, many refugees and older migrants who may not have acquired technological skills over time.
4. FECCA emphasises the importance of SBS radio in strengthening community cohesion and in protecting the rights and interests of Australia's CALD communities. This role has increased in importance in the current social and political climate, noting the recent Scanlon Foundation report *Mapping Social Cohesion* which highlighted a rise in the proportion of people experiencing discrimination on the basis of skin colour, ethnicity or religion.
5. FECCA wholeheartedly supports the excellent work of SBS Radio. We encourage SBS radio to maintain its broad reach and comprehensive language services. In particular, FECCA believes that we must work to ensure that Australia's migrant communities do not bypass Australian media and consume international media via

internet/satellite as this has repercussions for integration and a sense of belonging to the Australian community.