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Community Broadcasting Foundation

Consultation Policy

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Advisory Committee	Finance, Audit and Risk Management (FARM) Committee
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Introduction

The CBF is committed to actively consulting with the community broadcasting sector and other stakeholders to ensure that our grant programs and processes are responsive to sector needs, and to encourage cooperation and collaboration within the sector.

The community broadcasting sector is by nature, a very diverse sector. In framing this policy, the CBF aspires to give real opportunities for the diverse voices, opinions and perspectives within the community broadcasting sector to be heard, while balancing this with the necessity for the CBF to effect practical outcomes within reasonable timeframes.

We strive to achieve this by increasing communication and awareness of our efforts in accordance with this policy, the CBF Strategic Plan, vision and values.

Purpose

This Consultation Policy is intended to provide a framework to bring together the different methods of consultation, to provide context and guidance in relation to the CBF's commitment to independence and being responsive, and to clarify the relevant stakeholders, timeframes and responsibilities involved in consultation.

Policy

The CBF commits itself to consulting with its stakeholders through:

- **Our Board, Committee and Assessor Team membership:** Our funding decisions employ peer review processes; the voluntary involvement of experienced community broadcasters and industry experts is at the heart of how we operate.
- **CBF Monitoring & Evaluation Framework:** our M&E Framework sets out how we engage with stakeholders to seek perspectives and experiences to help us measure and demonstrate our impact, to inform our grant-making and decision-making, to feed into our own policy development, and to measure the effects of changes we make. It sets out the variety of methods we'll use to consult at different times with different stakeholder groups on different topics relevant to our M&E. It also sets out some ethical considerations and risk management protocols for how we do this in a responsible way.
- **Sector Representative Organisations (SROs):** In most cases, the CBF considers it impractical to consult directly with Stations (around 460) or Broadcasters (around 24,000), and instead utilises the existing sector representative structures. We consult with relevant national Sector Representative Organisations (SROs) prior to the introduction of any significant changes to funding policies and practices. This consultation can take place formally or informally, depending on the context. Submissions received through formal consultation are published together with the finalised CBF position on the issue, unless confidentiality is requested.
- **Direct feedback:** The CBF also receives direct station/broadcaster feedback through focus groups, formal correspondence and informal interactions which are filtered through to Committees where appropriate.
- **Indirect feedback:** Further consultation comes through sector research, data and insights, including the Community Radio Listener Survey.

When considering changes to grant programs, the relevant Advisory Committee should consider how to best consult with the sector, and make its consultation plans available to the Board.

All formal consultation advice is considered by the relevant Committee and/or the Board and acted upon where it is considered appropriate and practical to do so.

The CBF will consider the views, opinions, and perspectives tendered through its consultation mechanisms but is under no obligation to act on the advice so provided.

Correspondence that a reasonable person would consider to be frivolous, vexatious or malicious in nature will not be considered by the CBF.

Consultation Procedures

Responsibilities

It shall be the responsibility of the Board to establish and maintain policies and procedures and to bring these procedures into effect.

It shall be the responsibility of the staff to ensure the implementation of these policies and procedures.

Procedures

1. The CBF will formally consult with relevant SROs when:
 - Undertaking strategic planning;
 - Developing new grant categories or programs;
 - Making major changes to grant guidelines;
 - Permanently ceasing existing grant opportunities;
 - Making significant structural changes to the CBF; or
 - Framing terms of reference for evaluation reviews of grant programs or major projects.

Such consultation can take place through:

- a. The circulation of draft documents to SROs for formal comment (eg. draft grant program purposes, implementation plans, draft strategic plans, draft grant guidelines or draft terms of reference for reviews). To give the SRO adequate time to seek input from their constituents or for their Board to properly consider a proposal, the CBF should allow at least a four to six-week timeframe for responses.
 - b. Consultative committees, Community Broadcasting Sector Roundtable or other mechanisms which facilitate the gathering of representatives from national SROs to provide advice;
 - c. Regular input from SROs to the CBF's Board meetings through the exchange of written or verbal reports; and
 - d. The consideration of sector coordination grant applications and reporting, where applicable (e.g. CBAA, NEMBC, Disability Media Australia).
2. The CBF does not consider it necessary to consult on minor changes to grant guidelines. Minor changes include: grammatical edits for clarity; changes to grant deadlines or timeframes; changes to maximum grant levels; changes to eligible items of expenditure; or minor adjustments to grant priorities.
 3. For all other grant and policy development, the relevant Committee or Management will consider an appropriate level of consultation, and make its consultation plans available to the Board. Consultation options include, but are not limited to:
 - Advisory committees
 - Sector project and coordination grant consultations
 - Independent reviews
 - Focus groups
 - Online surveys
 - Interviews with key stakeholders

- Reference to industry experts
 - Conversations with relevant parties
4. Where practical and with prior Board notification, the CBF encourages Committees and Management to engage in appropriate consultation mechanisms on behalf of the CBF.
 5. Where direct, formal correspondence is received from stakeholders, this feedback will be considered by the appropriate Committee or Management in the first instance, and where appropriate, circulated to the CBF Board with Committee or Management comment for advice or action.
 6. The CBF will, where feasible, provide a timely, formal response to direct, formal correspondence from non-SRO stakeholders. However, where the issues raised by an individual are perceived by the CBF to have broader application than that individual's situation the correspondent will be encouraged to raise the issue through the relevant SRO so that any outcome relevant to the affected group can be broadly discussed and communicated.