

CBF response to the Review of the 2016 Community Broadcasting Foundation Restructure report and recommendations

Independent consultants Tony Grybowski & Associates, in partnership with Think Insight & Advice have provided their report on the review of our 2016 restructure.

The purpose of the review was to evaluate the effectiveness of the changes introduced in 2016 to refine the governance of the CBF and its grant-making processes.

The review process involved extensive research and consultation, bringing together strategic insight on best-practice grantmaking, analysis of the evidence base of our materials and stakeholder insights.

The review was very positive about the restructure and recommends a series of evolutionary refinements to our governance and operations.

The findings strongly encourage us to continue our work in enhancing our evaluation and performance frameworks to support the sector's sustainability and growth. The report also encourages the sector to develop long term strategic priorities and aspirations through the development of a Sector Roadmap.

The report makes 21 recommendations, and is structured in three sections:

- an overview, Executive Summary, recommendations and methodology
- analysis of the objectives of the review
- other critical inputs including a summary of qualitative research, an overview of community broadcasting in Australia and the funding context globally.

Our thanks to everyone who participated in the discussions and provided perspectives on how we can embed robust governance and practice into everything we do, to continually improve our processes to grant for positive impact and fund a thriving and resilient future for community broadcasting.

Review of the 2016 Community Broadcasting Foundation Restructure

Our response to the review report includes:

- Our response to the recommendations
- Comments on issues not identified by the Review report
- A note on diversity, cultural inclusivity, access and cultural safety.

In the spirit of open dialogue, we invite your feedback on the review report and our response to it. Written responses can be addressed to:

CBF CEO
Jo Curtin
jo@cbf.org.au

We also invite you to make a time for a conversation with Jo about the Review report and our response to it by calling 03 8341 5900.

Our response to the report's recommendations

No.	Recommendation	CBF Response
1	The CBF enhance the current Board induction program with refinements to the skills profile alignment, supported by a complementary Board Handbook to inform governance practice.	<p>ADOPT</p> <p>The induction materials we provide incoming Board Directors are comprehensive, but perhaps they are too complex. Reviewing these to reduce the volume of material and ensure the industry-specific jargon is reduced may be a worthwhile exercise. We will:</p> <ul style="list-style-type: none"> • Continue to consider Board skills and diversity matrices, and identified gaps, as part of Board recruitment processes. • Consider how we can better promote the skills and diversity matrices of the Board, e.g. through the Annual Report and website.
2	The CBF Constitution is amended to transfer responsibility for the recruitment of the President from the CBAA to a new President Nomination Advisory Committee.	<p>CONSULT, WITH A VIEW TO ADOPT</p> <p>We are supportive of this suggestion. We will:</p> <ul style="list-style-type: none"> • Consult with the CBAA and the Sector Roundtable about their views on the recommendation, with a view to adopt it.
3	The annual schedule of CBF Board meetings includes the evaluation and impact of activities, and allows for discussion of strategic and wider sector trends.	<p>ADOPT</p> <p>This recommendation gives us a good opportunity to reflect on our Board meeting structure, and the time we allocate to discuss particular issues. It would be useful to set out a calendar of agenda items to create space for strategic and trend discussions, and to encourage a shift in focus from operational matters to more longer-term strategic matters. We will:</p> <ul style="list-style-type: none"> • Create an annual calendar of key Board agenda items and plan for strategic and longer-term discussions.
4	The CBF senior management team is expanded to include a member responsible for performance management and evaluation, policy development and communications.	<p>ADOPT, WITH VARIATION</p> <p>We are in the process of recruiting an Outcomes and Evaluation Analyst, and we have recently recruited a new Strategic Communications Manager. The process of recruitment for the Outcomes and Evaluation role is taking longer than we expected due to challenges in the current job market. We believe we have advertised these roles at the correct level at this stage, and in line with current organisational needs. The Strategic Communications role is responsible for the implementation and delivery of our Communications Strategy. The Outcomes and Evaluation role will assist us to move our Outcomes based funding model and grant and organisational evaluation frameworks to the next level of design and</p>

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		<p>implementation. We believe that this will deliver improvements in the overall project management of our sector-wide development grants and assist us to enhance our data collection, evaluation and reporting frameworks. We do have some concerns over mixing a policy and evaluation role with a communications role as we feel that strategic communications is a key tenet of us delivering on our strategic plan. We feel that implementing this recommendation as it stands would require a strategic organisational restructure which we do not feel is necessary at this stage. We will:</p> <ul style="list-style-type: none"> • Continue recruitment for an Outcomes and Evaluation Analyst.
5	<p>Future Strategic Plans include more precise and quantifiable Performance Measures to enable effective outcomes reporting.</p>	<p>ADOPT</p> <p>We agree with this recommendation. Our current Strategic Plan will need a refresh following completion of the Sector Roadmap in order to ensure that CBF performance measures are aligned to this new sector driver. We feel that this will be an appropriate time to review the current performance measures. It is also worth acknowledging that some performance measures within our Strategic Plan will be defined on the completion of certain items of the Plan (for e.g. the Future Fund and the Inclusivity Framework). In the meantime, we have reviewed our Board reporting templates and have developed a score card reporting mechanism that will inform future reporting to the Board. We will:</p> <ul style="list-style-type: none"> • Review strategic plan performance measures in line with completion of the Sector Roadmap • Review all current Board reporting mechanisms to ensure aligned to current Strategic Plan performance measures.
6	<p>The membership of the CBF Audit and Risk Committee is revised to allow for the appointment of an independent Chair.</p>	<p>ADOPT</p> <p>Our interpretation of this recommendation is that the appointment of an independent Chair to our Audit and Risk (ARM) Committee would NOT be an existing Independent Director – but that the new Independent Chair would report to the Board as required. We will include grant-making skills and experience in the desirable selection criteria, along with experience with risk management and financial background. We will:</p> <ul style="list-style-type: none"> • Review ARM Committee Charter and consider changes that would be required to enact this change. • Define key skills and characteristics we would look for in a new Independent ARM Committee Chair. • Conduct recruitment process to attract a suitably qualified volunteer to the role.

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7	Future Annual Reports are structured to align with the reporting framework of the Strategic Plan.	<p>ADOPT</p> <p>This recommendation has been implemented for the 2021/22 Annual Report that is in development. We intend to carry this recommendation through to all future reporting requirements where possible and with the new Outcomes and Evaluation Analyst role in place will be reviewing the structure and composition of all future reporting mechanisms.</p>
8	The Board monitors implementation of Recommendations for future consultant reports through regular reports provided by Management.	<p>ADOPT</p> <p>While we agree with this recommendation, we feel this is already a current practice. With the nature of our workflow (i.e. two grant rounds a year), changes made to our granting practices and policies can take time to implement. For example, the Supporting Station Resilience Review outcomes are still being implemented two years on from the receipt of that report. This is due to the sector consultation, Grants Advisory Committee (GAC) consultation and implementation action plan timeframes that are associated with any major changes to our granting programs.</p> <p>In light of this, further consideration will be given to the schedule of independent reviews that are currently flagged for completion. These reviews take a considerable amount of time to conduct, manage and, as noted, subsequently implement. Future reviews will be driven by the CBF's strategic plan and any future performance management framework. We will:</p> <ul style="list-style-type: none"> • Complete ongoing requirements of Board reporting on review outcomes as applicable. • Once the new Outcomes and Evaluation Analyst role is engaged, the Support Team will review the schedule and nature of planned independent reviews to ensure their alignment with current strategy and best practice.
9	The CBF makes representation to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to undertake a review of the funding categories included in the four-year funding Deed.	<p>ADOPT</p> <p>We agree with this recommendation provided the representation is made in line with the Sector Roadmap which will provide an evidence-based assessment of sector needs and extensive consultation to identify and agree on sector needs and priorities to inform future funding strategies.</p> <p>We will:</p> <ul style="list-style-type: none"> • Develop a four-year Forecast Report to inform the next two years of funding in the current Funding Deed with the Department of Infrastructure, Transport, Regional Development, Communications & the Arts (DITRDCA).

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		<ul style="list-style-type: none"> Develop a proposal for the next DITRDCA funding deed provisions that will be informed by the Sector Roadmap, on its completion.
10	<p>The Advisory Committee structure is revised to provide four committees with the following responsibilities: Content, Sector, Operations and Project Management.</p>	<p>REQUIRES FURTHER CONSIDERATION AND CONSULTATION</p> <p>There are a number of consequences that would flow from the adoption of this recommendation. We need to think carefully about the intent, purpose and function of our committees to ensure they are fit for purpose, operate consistently and have appropriate workloads for our volunteers. As such, we will:</p> <ul style="list-style-type: none"> Maintain linking Chair roles while we consider a path forward. Further consider the impact of change to our existing committee structure with particular focus on the role and responsibilities of the Sector Investment Advisory Committee (SIAC) and the proposed project Management Advisory Committee (PMAC). Any future new committee should have the appropriate skills mix, including Project Management. Advisory committees need a mix of skills that add value. If the Chair roles are no longer linking roles in any newly defined Committee structure, we would need to create a mechanism for communicating between committees. In parallel with the Sector Roadmap process we will consider further what constitutes a time-limited sector project as opposed to ongoing core activities, noting that the Review report frames Amrap, CBOonline and the National Training Program as “Sector grants” considered by SIAC, and the Digital Radio Project, Multiplatform Distribution Project, Enhanced National News Programming and Industry Capacity and Skills training fund as being considered by the proposed PMAC (see table on page 25 of the report). Further consider the intersection and impact of this recommendation on our outcomes-based funding processes which frame sector development projects around impact and our attempts at holistic funding and monitoring based around agreed outcomes. Consider evolving our existing reliance on volunteer committees for some key elements of the ongoing monitoring of project reporting, negotiation of outcomes and evaluation processes where these may more suitably be undertaken by relevant members of the Support Team (see more under recommendation 14). We will consider an updated delineation of roles and responsibilities to support the most efficient and effective oversight of projects. Formally consult with the CBAA and CMTO about their views on the proposed PMAC (as the proposed change may impact their operations and reporting mechanisms which have already been heavily influenced by the outcomes-based funding model we have implemented with them).

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11	The CBF Board undertakes the global budgeting function aligned with the Strategic Planning priorities and performance evaluation process.	<ul style="list-style-type: none"> Further consider the suggestion that sector coordinating entities apply for funds via the SIAC (see also Recommendation 12). <p>ADOPT</p> <p>We agree with this recommendation. Grants budget development should be informed by Sector Roadmap, Funding Deed and Strategic Plan. Some of the flow through of funds is discretionary and should be based on needs analysis and trends from previous years. This can only be done after the completion of Round 2 allocations. This analysis should form the basis of not only future budgeting requirements but also grants advisory committee grant decision making. A shift in responsibility and timeframe means there will be less certainty of funds available from each funding allocation for each category as published in the Round 1 grant guidelines but will provide the opportunity for a more robust and timely needs analysis. We will:</p> <ul style="list-style-type: none"> Approve annual global grant budgets for the upcoming financial year at the February Board meeting.
12	The CBF undertakes sector consultation to develop an agreed definition of ‘sector coordination’ that responds to the changing media environment.	<p>ADOPT</p> <p>Along with the definition of sector coordination, the strategic priorities that will be identified through the Sector Roadmap process will also assist the CBF and the sector to determine what are ‘sector projects’ and what are core, ongoing functions. These insights will assist us to work with the Government on negotiating sustainable funding for the ongoing functions, and to fund any key projects appropriately. The implication of this is that some funding allocations that are currently highlighted in our funding deed as projects, may no longer be defined as such. We also note that an agreed definition of sector coordination may differ from what sector coordination we may be able to support with the funding available. We will:</p> <ul style="list-style-type: none"> Consult with the sector through the Sector Roadmap process. Consult with CBAA, RPH Australia, National Ethnic Multicultural Broadcasters’ Council (NEMBC), Christian Media and Arts Australia (CMAA), First Nations Media Australia (FNMA) and Australian Community Television Alliance (ACTA) through the Sector Roundtable.
13	The CBF grant-making process and criteria align with the priorities and performance indicators of the Strategic Plan.	<p>ADOPT</p> <p>We agree with this recommendation and have started the process of reviewing the Grant Guidelines and GAC Evaluation Frameworks to be aligned to the new Strategic Plan. We will:</p> <ul style="list-style-type: none"> Continue to review our Evaluation Framework mechanisms with a view to implementation for Round 1 2023/24 grants.

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		<ul style="list-style-type: none"> Review our Strategic Plan and measures of success on completion of the Sector Roadmap to ensure alignment.
14	<p>The grant-making process is revised to allow for the moderation stage to be undertaken by CBF staff members – in line with CBF strategic objectives and the budget allocation – for endorsement by the Board.</p>	<p>ADOPT WITH CLARIFICATION</p> <p>Further clarification about the roles and responsibilities between the Board, the GACs and the Support Team would be worthwhile, particularly considering the increasing professionalism and capability of the Support Team. This will need to be undertaken following further consideration of the committee structure, as per Recommendation 10.</p> <p>Note that we are supportive of this recommendation when it is interpreted in the following way:</p> <ul style="list-style-type: none"> That the GACs continue as the primary assessment role in the CBF. Consideration of strategic objectives will continue to be considered through the existing grant assessment and allocation process. It is not proposed that the Support Team determine or recommend funding outcomes. The Support Team does not and will not recommend grant allocations that are, or could be open to, political influence. The Support Team may provide corrections to anomalies that arise in the post-GAC meeting processing, such as correcting an amount where there is an error to the tax status. In these instances they will inform the GAC Chair of any edits to the grant recommendation tables in the GAC Report to the Board. The Support Team undertake a ‘sense check’ of the grant recommendations made by the GAC and highlight any issues that arise from the grant recommendations and are empowered to recommend solutions to the Board for consideration, particularly where a grant recommendation does not make sense. <p>We will:</p> <ul style="list-style-type: none"> Undertake a review of all Committee Terms of Reference (pending the outcomes of Recommendation 10) to further refine roles and responsibilities across our decision-making mechanisms. Develop procedures and document precedents to establish appropriate boundaries for any Support Team moderation and ensure we are effectively and efficiently facilitating volunteer engagement in key decisions.
15	<p>The CBF develop a Performance Management and Evaluation Framework that aligns with the new Strategic Plan, Sector</p>	<p>ADOPT</p> <p>We agree with this recommendation, however there are pieces of work required before this can be considered – the Sector Roadmap and the DITRDCA review of the Community Broadcasting Program</p>

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	Roadmap (on completion) and their Performance Indicators.	Fund. In the meantime, all performance reporting is being reassessed to ensure in line with new Strategic Plan. We will: <ul style="list-style-type: none"> Develop Performance Management and Evaluation Framework once the Sector Roadmap is complete.
16	That CBF Performance Reporting is revised to include a requirement to provide performance trend analysis against agreed key indicators.	ADOPT We agree with this recommendation and are currently undertaking a review of all performance reporting to ensure it is in line with the Strategic Plan. This recommendation is however intrinsically tied to the development of the performance reporting framework noted in Recommendation 15.
17	The CBF make representations to the Government to seek funding support to develop an evaluation framework to inform strategic priorities and guide future funding allocations.	ADOPT We agree with this recommendation. We will: <ul style="list-style-type: none"> Discuss funding options and process with DITRDCA.
18	The CBF collaborates with the CBAA to implement a comprehensive data collection system, used as a primary source for effectively analysing the sector's profile and performance.	ADOPT We agree with this recommendation and are already in discussions with the CBAA about collaborating in this space, noting that the CBAA has invested significantly in data and insights. However, we need to more fully understand our data collection and future reporting requirements in order to progress these conversations. The new Outcomes and Evaluation Analyst role is being brought in to help us progress our data and evaluation thinking. Future data collection requirements will need to be aligned to the outcomes of the Sector Roadmap which will inform future performance measurement indicators for both the CBF Strategic Plan and Government performance management framework. We are also mindful of data security and privacy obligations.
19	The CBF develops a 'Sector Accord', entered into by the Boards of the CBF and CBAA, to codify and clearly define the scope of partnership collaboration for the two organisations. The Accord would be established for a three-year period, with a review at the end of the term to determine its future relevance.	CONSULT, WITH A VIEW TO ADOPT We are open to developing an Accord with the CBAA and feel it would be appropriate to consult with CBAA prior to agreeing to this recommendation. We would like to investigate the benefits and challenges of having Accords with all sector peaks (CBAA, RPH Australia, NEMBC, CMAA, ACTA, FNMA) so that while the recommendation suggests doing this with CBAA, we see this as an initial discussion and pilot with a view to learning for the whole sector and benefitting our relationships with all sector peaks.

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		<p>If an Accord is developed with the CBAA it may be appropriate to include parameters and protocols related to data sharing (as per Recommendation 18).</p> <p>We will:</p> <ul style="list-style-type: none"> • Consult with the CBAA on their appetite for a Sector Accord.
20	<p>The CBF develops an advocacy and communications plan to enhance relationships with the sector. The plan will address perceptions relating to collaboration, the role of CBF, and the opportunity to be proactive in leading and communicating about issues affecting the sector.</p>	<p>ADOPT WITH CLARIFICATION</p> <p>We agree with this recommendation on the proviso that as per our Strategic Plan, the CBF does not aim to lead advocacy in the sector, we aim to collaborate in broad advocacy efforts. In relation to effectively communicating with the sector about our role, this is a fair criticism as we have not completed our communications roll out for our strategic plan which was to include webinars and workshops, some of which were postponed due to the pandemic, and others put on the lower priority list due to more pressing priorities. There is a degree of complexity in explaining our role and we have been actively speaking to sector stakeholders, building trust and inviting collaboration, on top of the everyday work the Support Team undertakes in communicating with the sector we have conducted external-facing communications that reinforce our role as a funder in a myriad of ways. Our communications plan will include a coordinated, multifaceted campaign which will take time and planning, and will consider the feedback from the sector that we have received to address the confusion about our role. We will:</p> <ul style="list-style-type: none"> • Develop advocacy and communications plan, including further sharing our strategic plan.
21	<p>The CBF clarifies the role of demographic data in the grant application process.</p>	<p>ADOPT</p> <p>The Support Team is already reviewing the demographic data collected and the nature of whether this information is part of the assessable part of the application form for Round 1 2023/24. This work forms a part of the review of the grant application process to align with our strategic plan and the actions that flow from the Supporting Station Resilience Review. Further review will continue once the Sector Roadmap is finalised to ensure the application process aligns with the broader sector priorities. We will:</p> <ul style="list-style-type: none"> • Continue review of application process and clarify whether the demographic data is relevant, and if so, whether that information is assessable. Communicate any changes internally and externally.

Comments on issues not identified by the Review report

Support for ethnic broadcasting

While not specifically identified as an issue by the review report, we are working to better understand and address a trend where fewer community stations are seeking grant support for their ethnic and multicultural programming since the revised grant structure was put in place in 2016.

There are a number of factors impacting this trend including aging ethnic broadcasters, second and third generation migrants having different needs and approaches to language and cultural maintenance than their (grand)parents, and other broader impacts such as the pandemic and changes to how people volunteer.

However, as custodian of the Ethnic Broadcasting Fund it is our responsibility to reflect on the data and the experiences grant applicants have shared with us and to work closely with the National Ethnic and Multicultural Broadcasters' Council (NEMBC) to ensure ethnic and multicultural broadcasters are receiving the support they need to broadcast to their communities.

We understand that analysis of need is more complex than the immediate needs expressed through funding applications and that some needs may not be captured through funding applications as a result of barriers to applying and awareness of available funding opportunities. We also reiterate, as per the terms of reference for the Review of the 2016 CBF Restructure, that there is absolutely no appetite to reduce existing funding allocations earmarked to support ethnic, First Nations and RPH community broadcasting.

Our initial response is to more clearly communicate with applicants and grantees about how ethnic funds are allocated, and to reduce barriers to applying for these funds through our grant programs, with some changes to application forms and guidelines anticipated for Round 1 2023/24 opening in early 2023.

Nominations Advisory Group feedback

The Nominations Advisory Group is made up of Presidents (or their delegate) of national sector representative organisations that opted in to participate in the process of providing oversight of nominees to our Board, advisory committees and the Assessor Team. This process did not receive much feedback in the Review report but we did receive feedback directly from members of the group prompted by the conversations about our structure that took place through the Review process.

Two of the sector organisations that participate in the process have suggested that we refine the process whereby we ask for scores against criteria for the nominees. The group participants noted that some nominees nominate for multiple positions, but the Group members are asked to provide a single score per nominee. Group members have indicated that their score would be different depending on whether the candidate was nominating for the Board or for a committee or as an assessor. As such we will refine the process where we gather their insights and advice on the nominees.

Corrections and clarifications to the report

There is one correction we would like to highlight that was not picked up in the extensive reviewing of the drafts of the report. In the *Value of Peer Assessment* section on Page 29, second last paragraph, the report states:

- The extent to which volunteers felt valued or supported shows variation, decreasing from 100% in 2017 to 2019, to 90% in 2021 and 81% in 2022

The stats we have however are as follows:

- volunteers felt supported: 100% in 2018 and 2019, 96% in 2021 and 93% in 2022
- volunteers felt valued for the work they do (a new question in 2021): 90% in 2021 and 81% in 2022

The statement in the report shows a decreasing statistic from 100% to 81% overall. However, the statement has actually conflated two different data points (volunteers feeling supported and volunteers feeling valued for their work) merging the questions/answers together like this delivers a stat that shows a misleading (and rather unsatisfying) decrease.

For the record, a correct statement would be: *"The extent to which volunteers felt supported by the Grant Support Team has fluctuated slightly over time from 100% in 2017 to 2019 to 96% in 2020, 98% in 2021 and 93% in 2022. A further survey question showed that 90% of volunteers in 2021 and 81% in 2022 felt valued by the CBF for the work that they do."*

A note on diversity, cultural inclusivity, access and cultural safety

The review commends our Board's skills and diversity. It recognised that the CBF has a responsibility to demonstrate leadership in support of diversity, cultural inclusivity, access and cultural safety.

While the consultation showed that many of our stakeholders found our organisation to be inclusive, there were some challenges highlighted in relation to our diversity and inclusion that we are working hard to address. As the report notes, "whilst the Community Broadcasting Codes of Practice requires the sector to 'oppose and break down prejudice', the challenge is to achieve this across the entire community broadcasting sector and should not focus only on those groups that some feel have been under-represented in the past."

As the CBF works towards the strategic outcome relating to creating connection and belonging throughout our diverse community through participation and voice, with a priority on supporting representative and inclusive community media, we understand the ongoing work required to build and maintain a culturally safe and inclusive organisation.

We would like to note that whilst diversity is in community broadcasting's DNA, our contemporary understanding of diversity, inclusion and cultural safety is evolving and, together with CBAA, FNMA, ACTA, RPH Australia, CMAA, NEMBC and CMTO, we are each working to develop our thinking and strategies to build our organisational and sector-wide capacity to address challenges and take actions that build a more inclusive space for all.