

# Indigenous Digital Inclusion Plan



## Response to the NIAA's Discussion Paper from First Nations Media Australia



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FNMA acknowledges the traditional custodians of the lands on which we work. We pay respect to Elders past, present and emerging.

This submission is made by First Nations Media Australia. Some members may make individual submissions in which case the First Nations Media Australia submission should not be taken to displace those submissions.

**First Nations Media Australia** (FNMA) is the peak body for the First Nations media and communications industry. Our purpose is empowering Australia's First Nations people through our culturally connected media industry. As at August 2021, FNMA's membership includes 62 organisations and 167 individuals who work in or alongside the community-controlled media industry as broadcasters, freelance journalists, photographers, filmmakers and allies.

First Nations Media Australia supports and amplifies the First Nations media sector and its objectives. Our activities include resource and policy development, skills development, networking events and meetings, content-sharing, promotion, regular communications, annual awards, research activities and representation.

As part of its industry leadership role, FNMA seeks to ensure First Nations communities have access to information required to make informed decisions, including access to public resources such as broadcast spectrum necessary to provide timely and relevant information to First Nations communities.

The crossover of infrastructure, digital literacy and access to information between telecommunications and media is significant. Therefore, First Nations Media Australia advocates for the digital inclusion and connectivity needs of all Aboriginal and Torres Strait Islander people. This submission is informed by over 10 years of industry and community consultation about regional and remote connectivity issues. First Nations Media Australia was a founding contributor to the Broadband for the Bush Alliance – a collective of 23 organisations focused on remote and regional connectivity within the satellite footprint under NBN - and the annual Broadband for the Bush Forum and continues to facilitate the annual Indigenous Digital Leadership Forum, bringing together representatives from remote communities, Telcos, stakeholders and Government departments to develop digital inclusion strategies and actions.

## Background to this submission

First Nations Media Australia thanks the NIAA for the opportunity to provide a written response to complement the verbal feedback provided in roundtable consultation sessions held between 12-27 October, 2021. FNMA appreciates the opportunity to provide direct input to this process through discussion with NIAA staff, consultation discussions and written feedback and acknowledges the NIAA's work to canvas the views of a broad array of stakeholders and interest groups on the topic of digital inclusion.

FNMA is a member of the Coalition of Aboriginal and Torres Strait Islander Peak Bodies (Coalition of Peaks) and as such participated in the development of the National Agreement on Closing the Gap and its target areas, including Outcome 17 on access to information. We are pleased to see action underway to move forward on achieving the target of equal levels of digital inclusion for Aboriginal and Torres Strait Islander people as other Australians by 2026, which significantly contributes to meeting targets in areas of health, education and other outcome areas.

The National Agreement on Closing the Gap commits Governments to ensuring Aboriginal and Torres Strait Islander people have access to information and services enabling participation in

informed decision-making regarding their own lives (Outcome 17).<sup>1</sup> This requires effective and reliable communication systems supporting the flow of accessible information to and from First Nations communities. FNMA defines communications in this context as follows:

1. **Digital Inclusion** - digital literacy/skills, affordability, awareness, online safety – which is increasingly being considered a basic human right and is essential to social inclusion;
2. **Access to Appropriate Online Services** - in telehealth, justice, education and training, Centrelink/ MyGov, banking, and other essential services where face-to-face delivery is not available locally. This requires free access, support with setup and training and helpdesk services for Indigenous language speakers;
3. **Telecommunications Access** – equity of access to communications infrastructure and appropriate services for: household or mobile telephony, broadband/internet, last mile sharing (eg Wi-Fi) and/or community access information and communication technology equipment/facilities;
4. **Access to relevant news, information services and emergency warnings** – reliable and trusted media services delivered via appropriate means (radio, TV, online, print) and available in language where required;
5. **Appropriate delivery of media and information services** - Effective, community-controlled media services empower Aboriginal and Torres Strait Islanders' self-determination, enable self-representation and promote social cohesion in the wider community.

Consumers are increasingly accessing their news and other media services via mobile devices, including radio apps, streaming services and visual media. Similarly, essential broadcast services in remote and regional areas are increasingly dependent on IP systems, using satellite and broadband networks to support a broad range of broadcast activities now that POTS lines are no longer an option. Reliable telecommunications services are essential for the provision of vital media services in remote, regional and urban areas and essential to Australia's democracy.

First Nations Media Australia has based the responses provided in this submission on consultation with media organisation members, inDigiMOB digital mentors and staff and participants in the Indigenous Digital Leadership Forum and Indigenous Focus Day sessions over the past couple of years. We gratefully acknowledge the contribution of views and ideas from representatives who attended these events in 2019, 2020 and 2021. This submission does not represent the views or concerns of all Aboriginal and Torres Strait Islander people, nor should it be taken to displace any specific community-based submission.



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<sup>1</sup> Australian Governments, *National Agreement on Closing the Gap*, July 2020

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## Access

FNMA recognises the lack of commercial incentive for telecommunication companies to expand their networks further in remote communities. However, telecommunications access is an essential service and digital inclusion is itself considered a human right and should therefore be a priority for Government support. Government must take action to address the impediments to accessing affordable communications and information services in terms of infrastructure, capacity and service reach, particularly for people living in communities where there is limited direct access to services. Without affordable digital inclusion, it becomes increasingly difficult for Aboriginal and Torres Strait Islander people to live, learn, work, establish businesses and access essential services throughout Australia.

Endemic in the transition to online-only services, accelerated by responses to COVID-19, is an assumption of access. The type of device you own, can access or use, increasingly shapes the type of services and social and economic activities available to you. Many service providers assume that individuals will use a computer to connect through a broadband service however, mobile phones remain the device more frequently used to connect to the internet. People are more likely to have access to a personal mobile phone in remote areas compared with urban areas where most people also have access to a personal laptop, or computer or a personal tablet. In remote/rural areas access to a personal laptop is extremely low and access to a personal tablet also very limited, preventing community members from becoming fluent and practised users of the key applications needed to engage in work and study.<sup>2</sup>

Government policies and programs must address inequality, taking steps to ensure the capacity for people living in remote communities to utilise digital services from an equity perspective. Currently, there is significant focus on the delivery of services, rather than whether the end-user of services has capacity to use those services. As discussed in some of the roundtable groups, this results in community organisations such as Land Councils, health clinics, media and other community services being relied upon to act as intermediaries supporting people to engage with various services. Besides the security and privacy implications associated with this practice, it places additional burden on organisations to extend beyond their primary purpose and provide services that they are not resourced to cover.

Before responding directly to the consultation questions, FNMA notes a focus on access in terms of connectivity, rather than in terms of accessibility through the discussion paper and highlights some critical differences between the two. Connectivity is clearly a priority for digital inclusion as it provides the technical capacity to communicate. However accessibility also relates to interactivity for users with a disability, language, capacity to meet verification requirements and provide relevant documentation or data sources. FNMA's responses to the Discussion Paper consultation questions take a wholistic view of digital inclusion and the communication requirements to ensure First Nations communities have not only the technology, but also the capacity to engage with digital services.

The assumptions and parameters underpinning the design of digital government services could be expanded to incorporate the use of audio and video in First Nations languages. Whilst a language

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<sup>2</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

translator for Centrelink services is under development, it currently only focuses on the Chinese and Vietnamese languages. Such initiatives will require a greater commitment to funding, innovation, and overarching targets to achieve the digital inclusion of Aboriginal and Torres Strait Islander people.<sup>3</sup> Some of these barriers can be categorised as digital ability or accessibility, rather than connectivity. In this section, we will focus responses on access in terms of connectivity and address some of the usability barriers under digital ability.

FNMA's position on access/connectivity is best summarised by the collective calls the Broadband for the Bush Alliance and FNMA have made for some years for a Remote Telecommunications Policy and Strategy which includes:

- o Public Internet access through community Wi-Fi and LTE systems;
- o Unmetered access to online government services, banking, education facilities etc;
- o Delivery of a variation on the Mobile Black Spots Program to target remote areas where there is market failure;
- o Roll-out of broadband services, including mobile coverage, to priority remote communities; and
- o NBN to begin a progressive terrestrial network expansion program to reduce satellite congestion, rain fade and to meet increasing demand by heavy users.

### 1. What are the major factors that reduce digital access for Indigenous Australians? Are they different in remote, regional and urban areas?

Home phone and internet connectivity is limited or non-existent in many small to medium size communities, with reliance on public phones and Wi-Fi services, where available. After over 20 years of the Universal Services Obligation, five Regional Telecommunications Reviews and numerous other programs, an estimated 30% of remote Aboriginal and Torres Strait Islander people are still without access to basic home telephony and/or internet.<sup>4</sup> The main type of internet availability is via use of mobile data, closely followed by public Wi-Fi and NBN fixed line.<sup>5</sup> With less than a third of remote First Nations communities connected by fibre optic cable, there is heavy reliance on satellite and microwave backhaul solutions.<sup>6</sup> Where there is no mobile coverage or last-mile delivery system in place, these services are commonly only accessible to service providers, creating a hyperlocal digital divide.

There are significant differences in opportunity to access services between people living in urban, regional and remote areas due to the physical capacity to attend a service delivery venue. Digital inclusion has the potential to address this imbalance, levelling the field in terms of distance-to-service for many services. However, this would mean providing support for digital inclusion from an equity perspective, rather than just providing an opportunity. Affordability and user accessibility become significant factors in digital inclusion from an equity of service access perspective. But the first barrier is telecommunications connectivity, of reliable phone and internet services.

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<sup>3</sup> Ibid

<sup>4</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

<sup>5</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>6</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

## 2. Whilst coverage of telecommunications services and digital connectivity has improved, the access gap has widened. What are the barriers to accessing existing telecommunications and digital services for Indigenous Australians?

The Mobile Blackspot program and associated micro-cells have resulted in significantly increased telephone coverage in remote Australia over the past three years in regions where there is a market imperative to provide telephone access. As the program starts to reach areas of market failure, more support from Government will be required to subsidise essential telephony services to communities to deliver coverage benefits for non-commercial regional and remote areas and meet capital, operational and maintenance costs.

The Mobile Blackspot Program primarily supports larger remote communities (mostly over 200-300 people) and transport routes due to the high cost of base stations and the need for a demonstrated business model for a telco to maintain a service for a minimum of 10 years. The increased use of small cell technology, satellite or microwave backhaul and more flexible arrangements being proposed under the recently announced 5A program are welcome to increase access by smaller communities, however the market model means limited eligibility for most remote communities.<sup>7</sup>

A large proportion of small to medium sized remote First Nations communities, particularly those without mobile coverage, are reliant on a single means of telecommunications access or have no access at all. Typically, this is a single payphone or community phone, connected via high-capacity radio concentrator (HCRC) microwave link or satellite link respectively.<sup>8</sup> The Indigenous Community Phone Program and associated Wi-Fi services are contracted to Activ8me. The program was initially designed to provide up to 301 fixed solar-powered phone booths to communities of less than 50 people. The booths are located in remote northern Australia, the Kimberley region in Western Australia, Arnhem Land in the Northern Territory and Mornington Island off the Queensland coast. In February 2019, 98% of the phone booths had Wi-Fi installed. Stage 2 of the program (2019/20) involved connecting 40 remote communities using the NBN satellite service. Another 14 communities were given access to public Wi-Fi for the first time. The Commonwealth currently pays for 20 gigabytes of free data per month per community, with content filtering.<sup>9</sup>

The National Indigenous Australians Agency (NIAA) also maintains about 245 payphones in the small to medium sized communities. These services are also maintained by Activ8me. The ACMA Communications report 2018-19 stated that there were 571 Telstra operated payphones and 246 non-Telstra payphones in remote Indigenous communities.<sup>10</sup> The ACMA claims that Telstra met its USO payphone fault repair benchmark (80%) in time delay for repairs of 3 days for remote locations with a fault repair performance of 86.2%. Fault reporting is mostly via remote monitoring where the payphone calls back into its management system to advise of its status, a system that could potentially be extended to test internet services also. In June 2019, Telstra announced an upgrade to its public phone network nationally, with improvements to pricing and technology.<sup>11</sup>

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<sup>7</sup> Ibid

<sup>8</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

<sup>9</sup> Ibid

<sup>10</sup> Australian Communications and Media Authority, *Communications Report 2018-19*

<sup>11</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

The recent introduction of free use of Telstra payphones across Australia is a small concession for mis-selling practices, but one that is appreciated in remote communities where payphones are quite heavily relied upon. However, there remains significant safety concerns about the reliance on payphones as the only means of communications in small communities, with no backup option if they are not working.<sup>12</sup>

Despite these improvements in mobile coverage and payphone accessibility, many remote sites continue to report patchy or unreliable mobile services with heavy congestion at peak use times due to limited backhaul capacity. Heavy congestion is also common on ADSL services.<sup>13</sup> This was a recurring theme through the roundtable discussions and one that regularly impacts FNMA members, interrupting broadcast services and telecommunications of all types.

Service outages in remote communities are quite common, impacting everything from phones to online banking, such as the capacity for people to make purchases using a Basics Card. Similar to reports heard from Land Council representatives in the roundtable discussions of wet-season impacts on service reliability and ongoing maintenance issues, FNMA members in the Torres Strait and the APY Lands report total outages that can last anywhere from an hour to several days while they have no capacity to report a fault or use their pre-paid phone credit trying to report intermittent faults. Fault rectification is a major area of consumer dissatisfaction, with regular referrals to the Ombudsman to have issues resolved and waiting up to 6 weeks for faults to be rectified.<sup>14</sup> Such outages, along with congestion on mobile phone networks, while frustrating, have become an unfairly accepted way of life in some remote regions, significantly hampering the reliability of businesses operating in the area and increasing risk during emergencies. Mobile towers typically run off solar power and have at least 24-hour battery back-up, but this may be challenged with extended weather events or where the mobile tower relies on local mains power. Heat, rain and fire events caused lengthy outages across East Arnhem Land and the Utopia Homelands in the summer of 2020, preventing residents from accessing money, purchasing food or contacting services. The same events also prevented technicians from accessing the communities to resolve the issues. Extensive disruptions to access were also experienced right down the east coast (QLD, NSW and Vic) due to the Black Summer bushfires and some outages due to power failures.<sup>15</sup>

There is an opportunity for media organisations to work with telcos to coordinate maintenance for telecommunications services, particularly in remote and regional areas where travel is a significant cost barrier to telcos currently. Media workers could be supported to build capacity and training in technical and IT roles through the Indigenous Skills & Employment Program (ISEP) currently being considered by the NIAA, in turn reducing the need for Aboriginal and Torres Strait Islander people to relocate for employment purposes. Through an appropriately funded program, this would present a potential opportunity to grow communications jobs through the provision of IT, technical and training expertise and reduce outages for telecommunication services.

There are barriers from a service availability perspective and also barriers from a service adequacy perspective. With an increasing number of services preferencing an online delivery model, having

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<sup>12</sup> Ibid

<sup>13</sup> Ibid

<sup>14</sup> Ibid

<sup>15</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

access to patchy internet service or occasional telephony is not enough to operate a business, participate in online education, regularly provide reports to receive entitlements, engage with telehealth services or a broad range of other essential services. Access levels sufficient to consider any community digitally included must meet a base level of reliability and suitable data capacity.

FNMA suggests the following steps be taken to address service reliability:

1. A full review of backup procedures for ADSL and 4G outages. For example, at Yuendumu in the Northern Territory, PAW Media has set up its telecommunications to default to Sky Muster when the 4G network drops out;
2. Implementation and reporting of remote monitoring of services to reduce fault-repair times;
3. Telecommunications companies be required to report on daily monitoring of service outages as part of the Universal Services Obligation;
4. Increased battery power and longer life batteries, complemented by solar power at exchanges to stabilise local power supplies;
5. Expand the rollout of fibre cabling to larger centres currently reliant on fixed wireless or satellite services; and
6. Support a training program for regional and community-based technicians to provide maintenance and technical services to both media and telecommunication services in remote communities with management of infrastructure and network maintenance through a central agency.

### 3. Are there issues in connecting to or using available satellite services in regional and remote areas? Are there issues with satellite latency?

The NBN Sky Muster satellites have been a game changer in terms of speed, data limits, reliability and affordable services. Most domestic users have migrated to the Sky Muster services (12Mb/1MB and 25MB/5MB options) and have mostly reported that this has met their day-to-day broadband needs. NBNco supports about 100 First Nations communities to access services over the Sky Muster satellite through its Public Interest Premise (PIP) program. The program supports public Wi-Fi through community centres and enables purchase of data by users through a voucher system. This was followed by the introduction of Sky Muster Plus in August 2019, to provide unmetered web browsing, emails and software updates and burst speeds above 25Mbps download and 5Mbps upload speed when network conditions allow. Since 1 April 2020, all traffic on Sky Muster Plus plans were unmetered except for video streaming and traffic via a VPN, both of which continue to be metered. Other enhancements include:

- a new 25GB+ entry plan offering 25GB of peak data and 25GB of off-peak data for video streaming and VPN traffic, to improve accessibility for lighter users;
- greater flexibility for RSPs to customise data allowances on their retail plans in increments of 5GB (starting from 25GB peak data/25GB off-peak data, up to 150GB peak/ 150GB off-peak);
- a 'top-up' feature, providing RSPs the option of offering 'top up' data, should their customers use their monthly metered data allowance (available in coming months).<sup>16</sup>

However, latency *is* still an issue and increasing demand for data will mean some users, particularly businesses will need higher data limits. Support for satellite backhaul is required to make these services reliable. In northern Australia where cyclones, storms and monsoonal weather can cut off

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<sup>16</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

communities for months, satellite services are particularly needed to receive critical emergency information. NBN Sky Muster services are especially susceptible to rain fade and can therefore be unavailable under heavy rainfall conditions.<sup>17</sup> With the increased need to access services online, particularly videoconferencing for telehealth and education purposes, there is parallel exponential growth in the amount of data required to meet community demand. This means significantly greater download limits for PIP and public Wi-Fi usage are needed, as well as expanded terrestrial NBN services in larger regional towns to address congestion issues. It is likely that Sky Muster solutions will need to be replaced by alternate technologies, such as Low Earth Orbit satellite options, to reduce latency and meet data needs and service reliability in the years ahead.

#### 4. Is there a preference for how telecommunications services are accessed, for example at the community level or at the individual premise level? If so, why?

For many remote First Nations people, a home telephone or mobile telephone service is the highest priority to enable unmediated communications with services and social networks across vast remote regions. Access to personal mobile phones is common with 35% of Indigenous Australians being mobile-only users.<sup>18</sup> A preference for prepaid mobile-only access by Indigenous Australians in remote communities is a response to affordability concerns. While these may reduce financial vulnerabilities by enabling more direct expenditure management than post-paid contracts, they exacerbate aspects of affordability related to value for expenditure.<sup>19</sup>

Accessing the internet via personal mobile phones (that may also be shared with family) and via public Wi-Fi, rather than through 'at home' or 'at work' connections on one's own device is more prevalent in rural and remote areas.<sup>20</sup> This presents significant safety issues for banking, Centrelink and other sensitive services. People with lower levels of income are more likely to use Android phones which are more susceptible to viruses and malware in using apps. People living in remote communities are less likely to subscribe to and less able to afford anti-virus software to protect against security threats. Public Wi-Fi poses some similar security risks. Therefore, while shared mobile devices are the current telecommunication preference for people living in remote and regional areas, they are not necessarily the best solution from a security perspective. Education programs to alert individuals to potential scams and cyber-security threats have increased urgency in this setting.

Community hubs and media centres can provide secure and supervised spaces to host telecentres. However, it should be noted that public facilities are not suitable for all online activities, such as accessing telehealth and/or mental health services, nor are shared facilities secure for banking and financial transactions. People living in remote and regional communities should reasonably expect to be able to safely and securely access the same Government services as people living in urban centres, particularly when the distance to service barrier is removed in an online setting. Still, access to computers, laptops and the internet facilitated through community-based organisations is the primary way people in remote communities can access devices, secure internet, and services

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<sup>17</sup> Ibid

<sup>18</sup> Young, M & Smede, B, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>19</sup> Thomas, J, Barraker, J, Wilson CK, Holcombe-James, I, Kennedy, J, Rennie, E, Ewing, S, MacDonald, T, Australian Digital Inclusion Index, RMIT & Swinburne Universities, 2020

<sup>20</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

online.<sup>21</sup> These centres do require a support person to manage the facilities and assist users. Aligning with the priorities in the National Agreement on Closing the Gap to build the community-controlled sector, FNMA recommends that Aboriginal and Torres Strait Islander community-controlled organisations should be supported to provide essential connectivity services. This would include creating job opportunities to provide technical and fault support and working with community members to facilitate and navigate access to online services.

However, we also note further safety issues arise in the management of community Wi-Fi which can bring both positive and risk outcomes to community organisations. For example, Ngaanyatjarra Media facilitates the community Wi-Fi network in Wingellina/Irrunytju and will turn off the service if there are concerns about online bullying or friction on social media within the community. However, staff can also become the focus of frustration when data limits are reached. The current data limit is 100GB per community each month, which can easily be used up within a couple of days. The average individual in Australia uses around 300GB per month.<sup>22</sup> In this way, the community Wi-Fi model is constrained as the preference model for remote communities by data limitations which need to increase to meet digital inclusion needs.

#### 5. Are there initiatives that have successfully addressed access issues? Why were they successful?

Beyond the Mobile Black Spot and Community Phones programs already mentioned, the introduction of low-orbit satellites is going some way to addressing latency. However low-orbit satellites could be used further as a backup for voice calls through the installation of a system to enable communities to switch to satellite transmission when needed. A rollout of Wi-Fi Mesh services should be implemented in communities not eligible for the Mobile Black Spots Program or Community Phones Program (typically sites with populations of between 50 and 250 people). A safety net approach is now needed to ensure a next-level digital divide is not set up between larger and smaller communities, or between service providers and First Nations households within communities.<sup>23</sup>

#### 6. Are there other initiatives that could address barriers to access?

The NBNco offers some good examples of responses to the COVID-19 pandemic which could potentially be implemented in future service delivery options. Under its 'Communities in Isolation' program, over 54 isolated communities have been provided with community Wi-Fi services in response to the COVID-19 pandemic. Many of those communities remain closed now and the health threat posed by the pandemic has not reduced considerably for many remote communities. Skymesh and Easyweb Digital are among the providers rolling this service out. NBNco is considering offering this as a product option in the future. The program was originally planned to continue to the end of September 2020 but has recently been extended for three years. Under its legislation (NBNco not being an RSP), NBNco can only offer the services free of charge and is obliged to remove the infrastructure at the end of the support period.<sup>24</sup> The Wi-Fi services were due to be removed after the pandemic, but recent policy transitions to living with the pandemic make it hard to define when the pandemic will be considered over. This may provide a case study for future legislative and/or

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<sup>21</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>22</sup> Australian Communications and Media Authority, *Communications and media in Australia – Supply and use of Services*, 2019-20

<sup>23</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

<sup>24</sup> Ibid

policy amendments to facilitate the provision of telecommunications services in areas where there is little or no commercial viability, but a public interest imperative.

In 2020, NBNco established a \$150 million financial relief and assistance fund to help internet providers to support their residential and small and medium business customers affected by the COVID-19 pandemic. NBNco also increased data download limits from 45GB to 90GB for standard NBN Sky Muster services to November 2020. Communities in Kowanyama, Yarrabah and Thursday Island were connected to enable delivery of online educational programs and deployment of Business Satellite Services at border closures.<sup>25</sup>

FNMA identifies the following actions as requirements for digital inclusion from a connectivity perspective:

- Increased mobile phone coverage through the extension of the Mobile Blackspot Program and Regional Connectivity Program to communities who have previously been ineligible due to commercial interest and co-investment limitations;
- Continued support for community phones and payphones through the Universal Services Guarantee;
- Improved reliability of mobile coverage through a transition to 5G services;
- Support for remote community members to make the transition from 3G to 4G or 5G services, including education campaigns and device upgrade support;
- Increased data for satellite services, including measures to reduce latency issues;
- Provision of backup power measures to ensure continuity of phone systems during power outages and increasingly common extreme weather conditions;
- Increasingly, cloud-based services used by businesses require continuous connectivity, presenting a challenge for data storage, server access and system backups;
- Significant increases to data availability to meet increasing demand from business, education services and individuals; and
- Increased collaboration on the integration of technologies and their providers, for example using complementary satellite, fixed wire, microwave and Wi-Fi options to ensure continual and reliable services for remote and regional communities.

Beyond the expansion of mobile coverage and small cell satellites, the need for local digital inclusion plans and locally targeted digital skills solutions already discussed, there are efficiencies to be gained from the use of shared mast and tower facilities between media and telecommunication providers in remote communities. The current regulatory environment does little to encourage shared access to available infrastructure.<sup>26</sup> Potential collaborations between community-based organisations and telcos could be identified by the ACMA, or by telecommunications companies exploring existing community assets in scoping new infrastructure activities. For example, there is some shared infrastructure between telecommunications and broadcasting that can be used to build on existing government investment in broadcast infrastructure and to generate maximum public value from new infrastructure rollouts. First Nations media organisations may be called upon for technical skills, capacity building activities and infrastructure requirements as part of the Indigenous Digital Inclusion Plan.

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<sup>25</sup> Ibid

<sup>26</sup> Marshall, A, Dezuannia, M, Wockner, K, Babacan, H, Burgess, H, Crawford, F, Foth, M, Gregory, R, Mitchell, P, Neale, T, Rogers, S & Wallace, R, *Northern Australia Communications Analysis*, CRCNA, 2020

Market based and technology driven solutions have seen the emergence of government and private sector partnerships in certain locations or with specific groups to address technology access and skills gaps and an increase in divergent programs and investments in each State and Territory.<sup>27</sup> However, without a cohesive policy guiding these funding activities, the projects are ad hoc with little coordination or complementarity. Further measures are required to address the issues of limited community access facilities, last-mile distribution, affordability for people on low incomes, low digital literacy, impacts of cyber-safety issues and online fraud, and accessibility of online services for people with limited English/text literacy or disabilities. A coordinated effort towards the digital inclusion of Aboriginal and Torres Strait Islander people is needed, which would likely include awareness campaigns on social media, radio, free to air TV and an ongoing program of in-community and face-to-face workshops.<sup>28</sup> To meet this need, FNMA supports the Developing Northern Australia CRC's recommendation to "devise, fund and support an inclusive digital inclusion ecosystem strategy across industry, all levels of government and the community sector."<sup>29</sup> Furthermore, the establishment of a First Nations Technology Council to coordinate communications programs for First Nations people is a potential means of facilitating collaboration opportunities and promoting development of First Nations-owned digital enterprises.<sup>30</sup> FNMA encourages a focus on localised solutions delivered by small providers to tailor technology responses to the needs of remote communities, including small cell networks, satellite options and regional network solutions.

The 50/50 co-investment model adopted between the Commonwealth and jurisdictions to rollout telecommunications infrastructure is flawed and inequitable between the States and Territories, leading to significantly different outcomes for residents. FNMA refers the Committee to ACCAN's review of State and Territory Programs in the Remote Indigenous Communications Review (October 2020) to understand the discrepancy between state-based programs.<sup>31</sup> Almost all are focussed on infrastructure solutions. It also places an onus on communities and community organisations to negotiate inter-governmental partnerships with limited capacity to attain commitments from both parties. Communications has long been the Commonwealth's remit and it should therefore be providing the majority, if not all, of the funding investment for regional telecommunications. As telecommunications access is particularly essential in times of crisis and emergency for community safety, such as increasingly common extreme weather events, it may be possible for the NIAA to look to the Department of Home Affairs – Emergency Management for ongoing maintenance funding support to ensure the reliability of information service networks, including telecommunications and media.

The current model of providing infrastructure with no operational or maintenance support is flawed from a user perspective. FNMA recommends the Commonwealth provide at least 80% of operational expenses required to:

1. Support backhaul for Sky Muster services;

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<sup>27</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>28</sup> Ibid

<sup>29</sup> Marshall, A, Dezuannia, M, Wockner, K, Babacan, H, Burgess, H, Crawford, F, Foth, M, Gregory, R, Mitchell, P, Neale, T, Rogers, S & Wallace, R, *Northern Australia Communications Analysis*, CRCNA, 2020

<sup>30</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

<sup>31</sup> Ibid

2. Provide free public Wi-Fi to all remote communities with unlimited data limits, allowing community members to purchase as much data as they need through token or pre-purchase arrangements;
3. Provide free access to essential services including education, banking, media, Centrelink, Medicare and other Government services;
4. Resolve last-mile access barriers and through supporting localised and shared-service solutions; and
5. Support a network of Digital Access Workers to provide workplace training and support services to facilitate participation in the digital economy in an ongoing way (discussed further under Digital Ability).

## Affordability

Access and affordability are inter-related and should be addressed together at a national level.<sup>32</sup> Affordable access is the key to reducing the digital divide and closing the gap on First Nations disparity. The latest Closing the Gap figures highlight the need to address the underlying issue of poverty in First Nations communities that is contributing to delays in reaching Closing the Gap targets.

### 1. What are the major factors that affect digital affordability for Indigenous Australians? Are they different in remote, regional and urban areas?

Prepaid mobile services are preferred by Aboriginal and Torres Strait Islander people living in remote and semi-remote areas due to a controlled means of managing financial implications when sharing devices. However, pre-paid services are priced at a premium by telcos, further disadvantaging people of lower socio-economic status. This is a major factor impacting affordability for people in remote and regional areas.

The costs associated with accessing data intensive online services are prohibitive, particularly if access is mobile only.<sup>33</sup> More than one third of Aboriginal and Torres Strait Islander people have mobile-only service access (34.7%), compared to a national rate of one in five (20.4%). This reduces communications affordability, with pre-paid mobile data being poor value for money.<sup>34</sup> The Australian Digital Inclusion Index 2020 noted, "Indigenous Australians receive less data for each dollar of expenditure, as indicated by their Value of Expenditure component score (54.3), which is a notable 12.7 points lower than the national average (67.0). Mobile data costs substantially more per gigabyte than fixed broadband."<sup>35</sup> Due to low and unreliable income, pre-paid services are typically used for mobile and internet access, where Wi-Fi vouchers are available. There are also reports of high prices for Wi-Fi data vouchers in some sites.<sup>36</sup>

Aboriginal and Torres Strait Islander people living in remote communities are particularly vulnerable to mis-selling by corporate telecommunications providers, as demonstrated recently by the fine of

<sup>32</sup> Marshall, A, Dezuannia, M, Wockner, K, Babacan, H, Burgess, H, Crawford, F, Foth, M, Gregory, R, Mitchell, P, Neale, T, Rogers, S & Wallace, R, *Northern Australia Communications Analysis*, CRCNA, 2020

<sup>33</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>34</sup> Rennie, Ellie, Thomas, Julian & Wilson, Chris, *Aboriginal and Torres Strait Islander people and digital inclusion: what is the evidence and where is it?* RMIT, 2019

<sup>35</sup> Thomas, J, Barraker, J, Wilson CK, Holcombe-James, I, Kennedy, J, Rennie, E, Ewing, S, MacDonald, T, Australian Digital Inclusion Index, RMIT & Swinburne Universities, 2020

<sup>36</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

Telstra by ACCC, and to online scams and spam phishing. There has been a significant increase in phone scam reports from Aboriginal and Torres Strait Islander people in 2021, resulting in financial losses that have increased in total value from \$223,947 in 2020 to \$2.2 million in 2021 thus far.<sup>37</sup> It is clear that education and support systems are needed to curb this concerning increase. Government policies and programs currently focus on connectivity and access to telecommunications services through an infrastructure-led response, with almost no attention paid to digital ability, or the accessibility of online services to Indigenous language speakers or the risks of online activities including identity theft, scams and misinformation. Issues most often experienced in remote communities relating to telecommunications product choices include: signing up to contracts people cannot afford or for services they can't access, unintentionally using a lot of data and running out of credit frequently, replacing phones and numbers frequently, no or forgotten email account, and difficulty reading or writing English.<sup>38</sup>

While Telstra is taking steps to rectify mis-selling issues within its business structure and has agreed to pay a \$50 million fine and improve engagement and sales practices, the 2018 ACCC findings only highlight the vulnerability of Aboriginal and Torres Strait Islander people, particularly in remote areas, to profit-oriented businesses. It is not in the business interests of private telecommunications companies to provide consumers with transparency on the most affordable telecommunication packages available to them and there is an overwhelming array of satellite internet plans available, presenting a barrier to users for whom English may be a second, third or fourth language. Conversely, there is a lack of options and information about mobile phone plans in smaller communities, which limits ability to choose the most affordable or appropriate plan.<sup>39</sup> This results in about half of First Nations families in remote communities experiencing issues relating to the billing systems of satellite internet plans in the first six months of being connected.<sup>40</sup>

The difference in device access by Aboriginal and Torres Strait Islander people in remote areas compared to urban areas is suggestive of the difference in socio-economic opportunities experienced by those who reside in remote communities and towns and those in cities. It also highlights that affordability includes not just the cost of connectivity but also the cost of devices.<sup>41</sup> For this reason, FNMA suggests Government should provide support to individuals who are required to update their devices from 3G only devices to more expensive 4G and 5G devices to avoid leaving people behind when 3G services are shut down in the coming years.

Even in urban areas, the increasing necessity for data and associated data costs are a barrier affecting Aboriginal and Torres Strait Islander people regardless of where they live. The ACMA Supply and Use of Services Report for 2019-20 shows data usage more than doubling per average individual

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<sup>37</sup> Williams, Tom, *Phone scams are 'exploding' and costing vulnerable Australians millions, new data shows*, ABC, 28 September 2021

<sup>38</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>39</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

<sup>40</sup> Rennie, E, Hogan, E, Gregory, R, Crouch, A, Wright, A & Thomas, J, *Internet on the outstation*, Institute of Network Cultures, 2016

<sup>41</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

last year.<sup>42</sup> Where there is existing mobile and Wi-Fi services, these are being over-subscribed with the increased demand, and many services are not affordable.<sup>43</sup>

## 2. How can affordability be improved for Indigenous Australians living in urban, regional and remote areas to ensure equitable outcomes?

Aligned with principles of equity and economic development, Government should be subsidising data to provide free access to essential services for people living in remote communities who are disadvantaged by distance and cannot physically walk into a bank, a Centrelink office, a library, TAFE or a specialist health appointment. There should be no data charges to access education services, Government services, essential information services such as First Nations media or commerce services. Data alone will not resolve the complex set of digital inclusion barriers; community access facilities supported by dedicated personnel to facilitate engagement with the digital world will be required.

FNMA suggests the Government invest in a dedicated First Nations service through an unbiased third-party service organisation such as Choice or ACCAN or a dedicated helpline incorporated into the Regional Tech Hub to provide advice to consumers on the most suitable and most affordable telecommunications service for their region and required usage. And/or, build this service into the role of a Digital Access Worker in each community as a central and independent advisor/advocate for community connectivity. Some communities in the APY and Ngaanyatjarra communities are organically developing this model through financial literacy training to access online banking services. In addition, education workshops for Shire Council staff and community leaders to outline options for improved telecommunications should be implemented as a means of upskilling communities to engage in decision-making about their telecommunications options and advise communities.

## 3. Are there initiatives that have successfully addressed issues? Why were they successful?

FNMA notes discussion during the roundtables of NSW's Dine & Discover initiative which could potentially provide a model for providing subsidized data cards to Aboriginal and Torres Strait Islander people to access essential services such as education sites and government websites. While this does provide a solution to barriers previously encountered in the Northern Territory with Telstra in implementing zero-rating sites for government services, FNMA holds some concerns about such a program emulating the Basics Card model in applying inequitable restrictions to Aboriginal and Torres Strait Islander people. We suggest unmetered access is a more equitable solution for people living in remote communities as it would apply to all residents (including non-Indigenous people) on the basis of distance-to-service.

## Digital Ability

Government has invested heavily in the Mobile Black Spot Program and other infrastructure-based solutions to digital inclusion. Government services are increasingly operating at a distance from place and people. Meanwhile, responsibility for equitable access to services that are increasingly transitioning to an online-only model increasingly rests with community-based service providers that have no funding or capacity for supporting digital access or awareness. Parallel investment is

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<sup>42</sup> Australian Communications and Media Authority, *Communications and media in Australia – Supply and use of Services*, 2019-20

<sup>43</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

required in strategies and programs to keep people informed and to facilitate a network of Digital Support Officers (or similar) in communities as a dedicated role to support interaction with online systems.

1. What are the major factors that affect digital ability, including attitude and confidence, for Indigenous Australians? Are they different in remote, regional and urban areas?

There is a lack of digital literacy education programs especially in remote areas particularly, exacerbated by the withdrawal of Vocational Education & Training (VET) programs and the absence of digital inclusion policy and investments at all levels of government. This increases the burden on individuals and community-based organisations to facilitate digital engagement.<sup>44</sup>

Digital engagement with online services often requires English literacy fluency. Where digital and English literacy is a barrier, access by alternative means such as phone support are woefully inadequate due to long wait times, poor customer service or use of virtual assistants.<sup>45</sup> Issues are encountered not only with online access to services but also with the alternative mechanisms to connect with services providers. Long wait times on phone calls, not being able to explain the issue they need assistance with and not being understood are pervasive issues requiring dedicated support beyond the ability to use devices, apps and email.<sup>46</sup>

The digital ability programs that are currently available to Aboriginal and Torres Strait Islander communities are often short-term, single skill-set focused and offer little in the way of ongoing support for ad hoc access issues. A medium-term solution is required to build capacity for community members to establish and confidently and safely engage in a 'digital life', including support for meeting security requirements, setting up relevant devices, education and support for engaging with telecommunication providers and services and on-site assistance to navigate evolving digital services. FNMA supports the 'train the trainer' model discussed at the roundtables, which in many ways aligns with the inDigiMOB model of digital mentors being available to communities. However, a more structured program is required to upskill individuals to take on those roles within communities and be based there for a number of years to build confidence and shift attitudes toward digital ability. Government must acknowledge that such a program would take time to secure long-term results.

2. What is needed to encourage greater understanding and use of digital technologies? / 3. How can digital ability be improved for Indigenous Australians living in urban, regional and remote areas?

FNMA recommends a network of Digital Support Officers or Community Connectivity Mentors be established to support awareness and engagement with telecommunications for remote communities. This could follow a similar model to the Indigenous Rangers program, providing meaningful local employment opportunities for people living in remote communities. Employing local residents to undertake these roles will encourage Elders and other community leaders to engage with digital processes and are less likely to want to turn off access in communities in response to misinformation and cyber security risks. This form of people-centered approach to digital literacy needs would support the intergenerational transfer of knowledge as well as mitigating

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<sup>44</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>45</sup> Ibid

<sup>46</sup> Ibid

the risks for remote Aboriginal and Torres Strait Islander people emerging from the Government's digital transformation agenda. There is opportunity to include this role in measures currently in discussion around the Indigenous skills, engagement and employment program (ISEP). The ISEP could have a local focus for the development of digital skills within communities through the employment of Digital Mentors as an emerging skillset, particularly for the employment of young people.

These roles could be auspiced by a community-selected organisation, such as a public library, media centre, Shire Council, school or clinic and could potentially also support nearby communities – depending on the most appropriate arrangements for each community. Again, FNMA recommends flexibility for localised solutions be embedded in the program structure and agrees with comments made during the roundtable discussions about the need to implement solutions at places community members already frequent to increase the likelihood of success.

#### 4. Are there initiatives, including international initiatives, that have successfully addressed digital ability issues or improving digital skills, particularly for older Indigenous Australians, and why were they successful?

The 'Be Connected' program is funded to increase digital inclusion rates among older Australians to reduce vulnerability to scams, increase participation in society, decrease social isolation and reduce disadvantage. However, these are mainstream activities; they are not tailored to the needs of Aboriginal and Torres Strait Islander people, presenting a structural barrier to engagement of older Aboriginal and Torres Strait Islander people in existing initiatives. Nor is the funding provided for this program sufficient to meet the expenses of workshop delivery in remote areas. More recent programs such as the 'Be Deadly Online' digital literacy initiative, the Government's online safety awareness campaign 'Keep Our Mob Safe Online' and a focus from the ACCC's Scamwatch website on First Nations communities each focus on safety education for Aboriginal and Torres Strait Islander people. It is worth noting that each of these activities are online resources, reliant on a level of digital literacy and access assumptions. There is no funding provision for community training delivery to support engagement with the online resources available.

First Nations Media Australia has partnered with Telstra to support digital inclusion education activities in 18 remote communities and town camps across the Northern Territory through the inDigiMOB project. Telstra also funds digital inclusion programs in First Nations communities including Indigenous Digital Excellence and Deadly Digital Communities (run by State Library of Queensland).<sup>47</sup>

inDigiMOB forms partnerships with communities and local organisations to create a suite of appropriate resources to meet the needs of individual communities for digital inclusion. Some examples include resources to help navigate online banking, use Google, avoid online scams, choose a phone plan, use social media safely and utilise map functions. The inDigiMOB model of digital mentors supported by workshop opportunities has been successful in some regions of the Northern Territory where it has been operating for 4 years now. inDigiMOB is not currently resourced to meet the demand in remote communities either geographically or in terms of service delivery. With support from Telstra, inDigiMOB has also started working with communities in South Australia and Western Australia, as well as the Northern Territory in response to interstate requests from

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<sup>47</sup> Featherstone, Daniel, *Remote Indigenous Communications Review*, ACCAN, October 2020

communities. Workshops are reported as the best way in remote areas. The ability to use interpreters whilst facilitating community-based workshops and share information in languages other than English may be an important factor.<sup>48</sup>

While the inDigiMOB program supports digital mentors to travel into communities for digital upskilling workshops, it is a piecemeal approach heavily constrained by funding resources. A sustained investment is required to support communities least served by telecommunication services to build relationships, develop regionally appropriate resources in local Indigenous languages and develop digital skills in an ongoing manner. Community-based digital literacy and mentoring programs are also supported by CRCNA.<sup>49</sup>

## 5. What organisations or agencies could support and improve digital ability levels?

There is significant potential to upscale a program like inDigiMOB, in partnership with Shire Councils to exponentially increase the delivery of digital skills workshops, supported by an ongoing Digital Support Officer available to each community to resolve some of the barriers facing digital inclusion for Aboriginal and Torres Strait Islander people living in regional and remote communities. However, this would need Government support rather than being left to corporations and/or communities to fund.

Although inDigiMOB currently focuses on the digital ability needs of remote communities, it could equally support increased digital ability levels in regional and urban areas, working with local communities to establish and meet priority needs. Similarly, inDigiMOB could support a network of Digital Access Workers with resources, manuals and culturally appropriate how-to guides. Potentially in partnership with an organisation such as the Community Media Training Organisation (CMTO) and the two Registered Training Organisations within the First Nations media sector (Goolarri Training in Broome and 4AAA training in Brisbane), FNMA and inDigiMOB could deliver train-the-trainer support for Digital Access Workers going into new roles within communities. Such a program could be supported by training funding at either a Commonwealth and/or state level and would potentially provide a recruitment pathway for university graduates.

## 6. What is needed to help address online safety issues experienced by Indigenous Australians?

Previously discussed.

## Data

### 1. Are there any additional existing data sources regarding Indigenous digital inclusion or other data sources that are being used to measure Indigenous digital inclusion?

There has been limited data collection on connectivity updated since 2016-2018. FNMA notes that the Australian Digital Inclusion Index is working to provide updated information currently, but that data is not yet available and requires resourcing to provide a survey sample sufficient to produce dependable results.

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<sup>48</sup> Young, Metta & Smede, Ben, *Indigenous community perspectives and experiences of digital inclusion*, ACCAN & FNMA, March 2021

<sup>49</sup> Marshall, A, Dezuannia, M, Wockner, K, Babacan, H, Burgess, H, Crawford, F, Foth, M, Gregory, R, Mitchell, P, Neale, T, Rogers, S & Wallace, R, *Northern Australia Communications Analysis*, CRCNA, 2020

## 2. What data needs to be captured for the ongoing measurement of Indigenous digital inclusion? /

### 3. How can data on Indigenous digital inclusion be better captured and utilized?

The Australian Digital Inclusion Index is the most thorough analysis of digital inclusion available currently and is entirely funded by Telstra with a very limited sample size of Aboriginal and Torres Strait Islander people. A supplementary 4-year project to map digital inclusion and media use in remote First Nations communities has been established by RMIT with Telstra funding support, but is limited to 10-12 remote communities. This needs to be expanded to give a more complete picture of issues and solutions across all 1,100 remote communities. The establishment of regional connectivity hubs through community centres could assist with the collection of this data information and with sharing data information with community members.

FNMA acknowledges its work has focused on remote communities over the past decade, initially as the Indigenous Remote Communications Association before transitioning to become the national peak body in 2016-18. Therefore, it has historically gathered more input from people living in remote communities to discussions of digital inclusion and only heard from members in urban areas in more recent years. Our data sources and evidence base, even anecdotally is less expansive in urban centres than it is in remote and regional settings and the data sources available do little to inform a national view of digital inclusion across all environments. A dedicated version of the ADII survey is needed to measure progress on the Closing the Gap target 17, including Aboriginal and Torres Strait Islander people living in urban and regional Australia.

### 4. What could be data proxies in the absence of specific data sources on digital inclusion?

It is quite possible that Services Australia, the ACMA, Department of Health, Department of Infrastructure, Transport, Regional Development & Communications and other Government service providers collect data relevant to digital inclusion, but there is no transparency in the collection of or use of that data for community organisations and/or Aboriginal and Torres Strait Islander communities. There is work relating to this issue underway through the Closing the Gap Data Development & Research Working Group, but there is no visibility on available data outside of Government at this stage, constraining the community-controlled sector's capacity to offer data-informed solutions to digital inclusion barriers. There is very little data available in the public domain to help communities or consumer advocate groups easily identify service and support gaps. Any data collected should be made publicly available to enable use by community organisations and peak agencies in planning and advocacy, and to reduce duplication of effort.

Other potential data proxies could include:

- Media consumption surveys (where are Aboriginal and Torres Strait Islander people getting their news and information?);
- Government service engagement data disaggregated by region;
- Reconciliation Barometer data, collected by Reconciliation Australia;
- Telco service provision data;
- Disability access data; and/or
- Usage rates of financial services disaggregated by region.

FNMA recommends the NIAA discuss data proxies with the Lowitja Institute for further ideas.

## Additional comments

There is significant work to be done to address this digital gap, including:

1. the rollout of infrastructure to provide access to communications technologies;
2. building awareness within First Nations communities of relevant online services and uses;
3. developing appropriate resources and support mechanisms to help digital ability and address issues of cyber-safety, the spread of misinformation and online fraud; and
4. supporting access to and participation in First Nations media.

Funding support for the implementation of the Indigenous Digital Inclusion Plan currently in development through the NIAA will be essential to making progress beyond policy frameworks. A national digital inclusion strategy will need coordination with and input from the States and Territories. This is likely to include the development and implementation of localised digital inclusion plans, potentially carried out through Shire Councils and targeted programs to address gaps. It will be helpful to have access to the data collection actions undertaken through the National Agreement on Closing the Gap to support this work and provision of dedicated funding will be essential to implementing any Indigenous Digital Inclusion Plan developed.

