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SBS Radio Services Review
14 Herbert Street
Artarmon NSW 2064

sent by email to: radioservicesreview@sbs.com.au

Feedback to the SBS radio review 2016

Introduction

Save Our SBS welcomes this opportunity to participate in the 2016 SBS Radio Services Review and public consultation process.

Save Our SBS is the peak body for supporters & friends of SBS with members in all States and Territories, representing a cross section of SBS audiences.

Broadly speaking, Save Our SBS supports the thrust of SBS's published *Draft Language Selection Criteria 2016/17* as documented in the Appendix.

We note the 2016/17 draft criteria are a slightly modified version of the SBS Radio Consultation 2012 draft criteria¹.

Below is the Save Our SBS feedback for the 2016/17 draft criteria.

SBS draft proposal for the *Large Languages Criteria*: population of approximately 25,000* or greater.

Save Our SBS response: The overall concept of giving weight to communities with a large language base is inclusive.

Save Our SBS notes that in the SBS Radio Consultation 2012, SBS proposed for this category a threshold of 20,000 or greater people who speak the language at home by the year 2020 (SBS 2020 Projection) but in this 2016 review suggest 25,000 or greater by end of 2017 when SBS launches new radio services (as per the 2016 Census data).

¹ *SBS Radio Consultation 2012*, 2 – 30 April 2012, (WebArchive) <http://web.archive.org/web/20120403190414/http://www.sbs.com.au/radio/consultation>

The SBS proposed criteria would seem reasonable in respect of the “linguistic and ethnic diversity” requirement of the Charter at s6 of the SBS Act:

(2)(c) promote understanding and acceptance of the cultural, linguistic and ethnic diversity of the Australian people.

If the purpose of the Large Languages Criteria is to cater for established larger communities, then the figure of 25,000 or greater may be appropriate. This SBS proposed figure could potentially exclude recent arrivals for whom SBS ought to cater. However such communities would presumably fall within the Special Criteria or High Needs Languages Criteria.

SBS draft proposal for the High Needs Languages Criteria: (maximum of 15 languages)
Threshold requirement - population must be greater than 1,000* English language proficiency (weight = 40%); Recentness of arrival (weight = 30%); Ageing (weight = 15%); Household income (weight = 15%).

**Population size based on 2016 Census data - Language Spoken at Home (LANP) other than English*

Save Our SBS response: Whist Save Our SBS notes that in 2012 SBS proposed a maximum of 10 languages and now suggests 15, until such time as the 2016 census data is released it is not possible for Save Our SBS to ascertain an absolute figure for the High Needs Languages Criteria. However, a proposed increase above the 2012 figure does appear appropriate; up to 25 languages might be fairer.

Although Save Our SBS acknowledges that it may be difficult to cater for a population of 1,000 or less persons, an arbitrary threshold of greater than 1,000 may be contrary to the Charter, particularly in reference to “*all Australians*” and “*presenting many points of view*” at s6 of the SBS Act:

(1) The principal function of SBS is to provide multilingual and multicultural radio and television services that inform, educate and entertain all Australians and, in doing so, reflect Australia’s multicultural society.

(2)(h) contribute to extending the range of Australian television and radio services, and reflect the changing nature of Australian society, by presenting many points of view and using innovative forms of expression.

Nevertheless, the order of weighting of the High Needs Languages criteria would appear practical:-

- English language proficiency: weight = 40%

- Recentness of arrival: weight = 30% - It is important to note that new arrivals often do not have ready access to the Internet and it cannot be presumed this cohort have Internet at home or sufficient data packages for phone apps. Therefore, radio broadcasts are crucial for these people in this High Needs category.

- Household income: weight = 15% (previously 20% for income/unemployment)
- Ageing: weight = 15% (previously 10%) - Radio broadcasts are essential for long term ageing residents who are possibly not sufficiently tech savvy to access the Internet.

SBS draft proposal for the inclusion via a *Special Criteria*: SBS may also include a sizeable ethnic community if its needs are significant but not adequately captured in the *Large Language* or *High Needs Selection Criteria*. Factors which SBS may take into account include: *Discrimination/Vilification*: where a group is subject to frequent discrimination or vilification in Australia based on race, colour, descent or national or ethnic origin, or *Immediate Need*: a significant increase in the population of a language group through *Australia's Humanitarian Program*.

Save Our SBS response: The inclusion of communities via the Special Criteria is warranted.

It may be worth adding to this category a section that includes *Ongoing Exceptional Needs* to cover communities that escape all the other proposed criteria for example: communities subject to ‘ongoing isolation’ (enabling the social cohesion role of SBS to be more fully implemented); or to cover ‘very low languages spoken’ in certain communities that are not covered by the other draft criteria (for example, Indigenous languages that might be at risk of extinction); etc.

Otherwise, the Special Criteria category appears to be entirely consistent with the SBS Charter and takes into account the most vulnerable groups in society for whom SBS ought to cater.

SBS asked for *Other feedback*

Save Our SBS response: The use of Census data to determine the program grid is appropriate for SBS radio. A similar method ought to be applied to SBS television services and across all SBS platforms: broadcast and online (radio, TV, POD, VOD, and print).

To maintain total transparency, SBS ought to publish the final criteria once it is determined.

Periodic reviews linked to subsequent Censuses would be welcome.

We look forward to hearing more about the progress of the radio review at the various stages over period forward.

**Save Our SBS Inc
Committee of Management**

Appendix

This Appendix is the text appearing at sbs.com.au/radio/consultation captured during the public consultation period 14 November to 11 December 2016.

Welcome to the SBS Radio Services Review website. SBS Radio is reviewing its services after the 2016 Census, to ensure its language services reflect the demographic make up of today's Australia. The last review was conducted after the 2011 Census.

Why is SBS Radio reviewing its services?

SBS has committed to regularly reviewing and updating its services every five years in conjunction with new Census data being available, to ensure it continues to reflect the needs of communities in Australia today. Regularly updating the schedule enables SBS to better service the largest communities with culturally and linguistically diverse backgrounds, and offer services to emerging and high-needs communities. The result from this Review will serve audiences from late 2017 until the next Australian Census in 2021 prompts the next review in 2022.

How does SBS Radio review its services?

SBS has developed a draft selection criteria and we are seeking feedback from audiences, communities and stakeholders on how to select the 'Large' and High Needs' language audiences. This is called the 'Public Consultation' stage of the SBS Radio Services Review.

The size of language communities is determined by the Census question: 'which language do you speak at home?' and the 'high needs' language communities are determined by a combination of Census data including English language proficiency, recentness of arrival, ageing and household income. SBS has applied weightings to each factor and when the Census data is applied, it produces an index of all languages in Australia and indicates those which are the most 'high needs'.

The 2016 Census data is due to be released by the Australian Bureau of Statistics (ABS) from April 2017. SBS wants to ensure the process of reviewing the SBS Radio Services is objective, open and transparent. Finalising the language selection criteria prior to the release of the 2016 Census data allows a framework to be in place to select languages, independent of the actual numbers released in the Census information.

The final selection criteria will be used to determine which languages are provided by SBS Radio services. The way in which those services will be delivered will be determined in 2017 by SBS, taking into account changes in audience listening habits, the need to support audience demands for anytime, anywhere news and information via digital platforms and the changing demographics of Australia's diverse communities.

Below are the draft language selection criteria that SBS is seeking public consultation and feedback on.

Draft Language Selection Criteria 2016/17

Large Languages Criteria:

Population of approximately 25,000* or greater.

High Needs Languages Criteria: (maximum. of 15 languages)

- Threshold requirement - population must be greater than 1,000*
- English language proficiency (weight = 40%)
- Recentness of arrival (weight = 30%)
- Ageing (weight = 15%)
- Household income (weight = 15%)

SBS may also include a sizeable ethnic community if its needs are significant but not adequately captured in the Large Language or High Needs Selection Criteria. Factors which SBS may take into account include:

- Discrimination/Vilification: where a group is subject to frequent discrimination or vilification in Australia based on race, colour, descent or national or ethnic origin.
- Immediate need: a significant increase in the population of a language group through Australia's Humanitarian Program.

**Population size based on 2016 Census data – Language Spoken at Home (LANP) other than English*

What do you think?

Large Languages Criteria:

We are suggesting 'large' languages will be included on the SBS Radio Schedule if there are 25,000 or more people who speak that language in Australia as per the 2016 Census data.

High Needs Languages Criteria:

Number of high needs languages to include and the minimum size of each: We are proposing to have a maximum of 15 'high needs' languages, with a minimum of 1,000 people who speak each of those languages as per the 2016 Census data.

The high needs index: is made up of the below high needs indicators. The relative weights of the indicators are shown in brackets below. SBS believes language communities with low English language skills, recent arrivals to Australia, ageing communities and those with low household incomes are the most in need of SBS's services. The combined indicators will create a list of languages ranked by need.

- *English language proficiency (weight = 40%)*: migrants with low English proficiency face greater challenges to settling in Australia because they have limited options to access Australian news and information.
- *Recentness of arrival (weight = 30%)*: newly arrived migrant audiences need access to Australian news and information to facilitate successful settlement.
- *Ageing (weight = 15%)*: language groups with an older age profile will receive a higher index.
- *Household income (weight = 15%)*: language audiences with lower net disposable incomes will receive a higher index.

Special criteria:

We have retained an additional criteria from the last review, giving language communities the option to apply for inclusion because of 'special needs' as described above.

Have your say

If you would like to make a submission or leave a comment, please click on the link below and enter your details and feedback by Sunday 11 December 2016. You can make a comment about one of the draft criteria, or all three.

What happens next?

The SBS Radio Services Review process includes the following stages:

1. 14 November to 11 December 2016 – Public consultation on the draft language selection criteria
2. March 2017 – SBS announces the final language selection criteria
3. April 2017 – 2016 Census data release commences from the Australian Bureau of Statistics
4. September 2017 – SBS announces revised services
5. End of 2017 – SBS launches new services