

**Submission of the  
National Ethnic and Multicultural  
Broadcasters Council**

**To the Senate legal and Constitutional Affairs  
Committee**

**In relation to the**

**Australian Citizenship Amendment  
(Citizenship Testing) Bill 2007**

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## **Submission of the National Ethnic and Multicultural Broadcasters Council in relation to the Australian Citizenship Amendment (Citizenship Testing) Bill 2007**

### **1. Introduction**

This submission is made by the National Ethnic and Multicultural Broadcasters Council (NEMBC) the peak representative body for over 600 ethnic community broadcasters around Australia. Our office is located in Melbourne and our membership consists of individual programmers rather than stations. Our role is to represent and advocate for the special needs of ethnic community broadcasters.

The NEMBC works with other peak representative bodies in community broadcasting, such as the Community Broadcasting Association, Radio for the Print Handicapped Australia, Christian Media Australia and the Australian Indigenous Communications. The peak bodies have developed a sector plan and joint funding submission (Attachment 1), through the Funding Strategy Group (FSG).

The FSG has recently launched a campaign to bring about more awareness of community broadcasting and to gain commitment from the federal government for a substantial increase in funding. The reasons which justify the increase are contained below and within the submission.

We thank the Senate for providing an opportunity to comment on the Australian Citizenship Amendment (Citizenship testing) Bill 2007.

### **Summary**

Given the limited time we have had to prepare this submission, it is relatively brief. In summary, the main points of this submission are that:

1. The NEMBC does not support the formalisation of the citizenship testing process and prefers the existing and informal counter tests. While the current proposal appears to be largely a formalisation rather than a harshening of the requirements, this is not apparent from the legislation.
2. We do not believe that a "test" from a pool of questions (or indeed even the very short course that currently exists) is actually evidence of deep or lasting knowledge of Australian history, legal frameworks, institutions or political tiers/systems. 'Cramming' can get people through a test but often the knowledge will be superficial. We also have concerns about the linking of 'knowledge of Australia' and proficiency in English.
3. We have concerns that the legislation gives enormous discretion to the Minister in relation to the nature of the test and the type or level of knowledge required. Potentially, candidates for citizenship will be subject to discrimination in that they will be expected to meet a standard of knowledge that might not be achieved by the majority of current Australian citizens.
4. We believe that it is in the interests of all Australians, including prospective citizens, to understand more fully the history of the country, its institutions and the rights and responsibilities of citizenship. However, this needs to be achieved through a variety of longer-term education processes, which use the most appropriate means to reach the intended audience. For some this will

involve formal learning, but for many (especially newly arrived migrants) delivery of information will be in their own language through informal means, like radio.

5. We submit that community broadcasting generally, and ethnic community broadcasting in particular, can deliver information and education to prospective citizens. However, we require better resources to enable this to occur.
6. Community broadcasting has an audience of over 4 million a week and in metropolitan areas we know that community ethnic broadcasting reaches over 600,000 Language Other Than English (LOTE) speakers per week.
7. Community ethnic broadcasting plays a key role in informing engaging and connecting both new and established migrants (and their descendants) to their culture, communities and events. It also informs about the broader Australian political and institutional life. Community broadcasting is ideally placed (along with other institutions) to actually engage prospective citizens in learning about civics and other aspects of Australian history and values.
8. Community broadcasting has experienced rapid growth in the last decade (54% in the number of stations from 286 to over 480), resulting in a substantial real funding decline. Current funding from the Commonwealth is \$8.1m. However, the sector has identified that we require \$16.8m in additional funding in four key categories: content development, training, infrastructure and sector coordination. Program content development is a key issue, with the actual hourly rate having declined from \$48 per hour in 1996 to \$35.35 in 2006/7.
9. We note that the House of Representatives Standing Committee on Communications, Information Technology and the Arts tabled its report *Tuning in to Community Broadcasting* on 20 June. That bipartisan report, the result of an exhaustive inquiry, recommends around \$15.4 million in additional funding for the sector and notes both the value of the sector and that the new funding is 'not substantial'.
10. We note that the Commonwealth proposes to expend approximately \$107 million in developing and administering the citizenship test over the next five years. We submit that for this considerable expenditure to be effective it must be supported by key educational initiatives that make it more likely that those who sit the test will have engaged with the material over an extended time and absorbed the knowledge more deeply.
11. A modest additional investment in ethnic community broadcasting and community broadcasting generally (\$16.8m) would not only continue the documented achievements of the sector, but facilitate the more effective delivery of the underpinning knowledge that supports the test. This modest investment might actually be more effective than the test itself (and at a fraction of the cost) in delivering new citizens who are knowledgeable in civics, history and Australian values.

## 2. The Australian Citizenship Amendment (Citizenship Testing) Bill 2007

The NEMBC has previously expressed its opposition to the introduction of formal testing as a prerequisite to citizenship. We recognise that there is testing of English skills currently, but that this is through an informal counter interview. We support the continuation of that informal process.

The addition is the requirement to test for 'adequate knowledge of Australia' (Minister's Second reading speech). We do not see what advantage is gained, especially given the significant cost, in formalising current arrangements and adding 'knowledge of Australia' in this way.

We do not oppose increased levels of knowledge. On the contrary we welcome better knowledge about civics, history and values on the part of all prospective and current citizens (including the more than 60% of Australians who according to a recent Amnesty International Australia survey believe that Australia has a Bill of Rights).

We support the *Lets Participate: A Course in Australian Citizenship* delivered by AMES, successful completion of which exempts the candidate being tested on responsibilities and privileges at the Department of Immigration citizenship interview. However, this is undertaken in the context of a less intrusive and threatening environment of the classroom and subsequently an informal counter interview, rather than a formal 'test'. For many new candidates the idea of a test alone will be intimidating and stressful. Elements of knowledge about Australia could be added to that course and simply be part of the interview process.

We are concerned that a higher standard of knowledge will be expected of migrants compared to the relatively low level of knowledge about many of these subject matters in the general Australian population. On the face of it nothing is wrong with the kind of knowledge that may be required about history, civics and values in the test (although this is unclear because of lack of detail). We question why migrants should potentially be subject to a higher standard than would actually be met by the majority of current Australian citizens.

We also believe that a formal 'test' will deliver little unless it is accompanied by real education and information – both formal and informal. For many migrants the formal education process is difficult and foreign. Informal means of engaging new migrants, through community organisations, workplaces or through media (like community radio and ethnic print media) will be much more effective than classroom based, formal delivery.

NEMBC also believes that the requirement for proficiency in English should be decoupled from the preparation for, and requirements of, the test. A candidate's English may be sufficiently proficient to operate in the community and at work, even to sit the test. However, the often complex stories, histories and layers underpinning the discussions (the real learning) about our political and legal structures may well be better delivered in the candidates first language. In our view that is where ethnic community radio could potentially be of great assistance.

There are additional concerns about the legislation. Its brevity might be seen as an advantage. However, the devil is often in the detail (the test itself, the pool of questions and how it will be conducted) and in this case there is a worrying lack of

substance. While Minister Andrews indicated in the Second Reading speech in the House of Representatives that there would be 20 questions, that the test would be in English and could be read to the candidate and that the pass mark is expected to be 60%, including three compulsory questions, there was little other detail. It is helpful to know that the test can be retaken as many times as necessary.

However, given the Minister's indication that 40% of those responding to the initial discussion paper in 2006 opposed the introduction of testing, it would have assuaged concerns to know in concrete terms the nature and level of knowledge required to meet the test.

In conclusion, we are sceptical about the purpose and efficacy of this 'test'. There is little evidence that the test will be supported by comprehensive informal and formal education processes. While the form of the legislation may now seem innocuous (when compared to the considerable political fanfare that accompanied the announcement of the concept) we do not believe the enormous cost either justifies or achieves the stated benefit.

### **3. Ethnic community broadcasting**

Ethnic community broadcasting has been one of the most successful social programs devised to manage the cultural change brought about by mass immigration in Australia since World War II.

There are 123 radio stations (including 6 full-time ethnic stations in each capital city other than Darwin and Hobart) producing 2,400 hours of ethnic community broadcasting each week. Over 3,000 volunteers from 125 distinct cultural groups broadcast in 97 languages across metropolitan, regional and country Australia. These are located in over 750 local communities in 70 locations around the country.

Ethnic broadcasting is part of the wider community broadcasting sector, which began during the mid 1970's as an initiative of the Whitlam Government. Community broadcasting has received bipartisan support since that time.

New immigrants report that early access to ethnic community radio makes a profound difference to their settlement outcomes. For older migrants and their descendants it fulfils their cultural needs and aspirations. Ethnic broadcasting is Australia's largest multicultural and multilingual institution. It responds to and shapes multiculturalism, unites communities and helps build the nation. The 2006 Census confirms that Australia has never been more multicultural, with a large number of federal electoral divisions having more than 40% of electors born overseas.

#### **An essential service**

A major Griffith University report entitled *Community Media Matters: An audience study of the Australian community broadcasting sector* (March 2007) studied why community broadcasting is a growing sector and why people value it (see [www.cbonline.org.au](http://www.cbonline.org.au)). The research reveals that audiences of ethnic broadcasters tune in because:

- Station programming plays a central role in maintaining culture and language
- Programs help to maintain community connections and networks
- Listeners can hear specialist ethnic music unavailable through other media
- They can hear community news and information

- They want to hear news and information relevant to their lives in Australia, and from their home and neighbouring countries.

Chapter 6 deals with ethnic community radio and their conclusion is that:

*... ethnic language programming appears to be fulfilling an essential role for many communities that simply cannot access the information they require from any other source. Our results indicate that it is providing an essential service for new migrants. But it is doing far more than this – when a community becomes more established in Australia, ethnic language programs act as an important link to other members of the same community in their local area through maintenance of languages, and links to home which other information and media sources cannot provide. (p72)(1)*

We would agree whole-heartedly with this conclusion. However, we would also argue that ethnic radio provides knowledge and information about the Australian social and political context for migrants. There is enormous potential to expand that educative role.

#### **4. The Community broadcasting sector**

Community broadcasting is unique in the Australian media. For the 4 million Australians (2) who listen to community radio each week it is a vital service providing valuable local news and information. This includes 685,000 who listen to community broadcasting only.

According to audience surveys, community radio reaches 28% of people who speak a Language Other than English (LOTE) in their home on a weekly basis (19.8% of Australians generally speak a LOTE at home). Around 23% of regular metro community radio listeners are LOTE speakers at home (around 608,000 of the 2.644m metro listeners to community broadcasting each week).

##### **Driving Media Diversity**

Community broadcasting is the most diverse media sector in Australia:

- There are 480 licensed community services broadcasting over 44,000 program hours 3 a week (3)
- 53% of community radio stations serving an array of different communities of interest including: indigenous and ethnic, radio for print handicapped, young people, older people, arts/fine music, christian and other religious groups, gay and lesbian (4)

By contrast, there are 39 commercial media owners providing 279 services and the ABC provides 64 radio services.

##### **Our contribution**

The sector also contributes significantly to society and the economy by:

- Promoting volunteering and community engagement; 23,000 volunteers provide an estimated \$212 million worth of labour annually (5)

- Developing transferable skills, including ICT, spoken and written communication and journalism. Over 7500 people a year receive training through community broadcasters
- Management training reduces the burden on regulatory authorities by equipping stations with the knowledge to better meet compliance regulations
- Providing people with their first experience in the media; the ABC acknowledges the important role community broadcasting plays as a training ground. (6)

### **Providing Local News and Content**

People listen to community broadcasting because of its local news and information (7):

- For people living in rural, remote and regional areas (over 70% of licenses are in these areas) it is a vital source of news and information
- It is the leading producer of local content in Australian media
- Provides community information such as emergency service broadcasts
- Indigenous and ethnic listeners identified community broadcasting as the primary source of news and information about issues and events relevant to their lives

Community broadcasting also more accurately represents Australian social, cultural and linguistic diversity than other media sectors:

- 35% of music played is Australian and the sector has a vital role in developing and supporting Australian Arts and culture
- AMRAP (Australian Music Radio Airplay Project) has contributed to a 25% increase in the level of Australian music broadcast by community radio over the past 3 years

Community radio stations are owned and run by the communities they serve and provide a vital medium for the dissemination of information, engaging individuals and promoting community cohesion:

- Station programming plays a central role in maintaining culture and language
- Community radio promotes community connections and networks
- In essence, community radio performs an essential service, representing diverse interests and bringing communities together

## **5. Funding: current situation**

Despite the many achievements of the sector, funding has failed to reflect its massive growth. In the last decade, the total level of Australian Government support has risen by 26% while the number of long-term licensed services has grown by 54% (from 286 to more than 480). This means that over the last decade:

- annual notional core funding per service has declined by 41%
- annual notional targeted funding per service has declined by 43%

Other reasons include:

- The emergence and inclusion of community television for the first time
- New technology needs - especially the move from analogue to digital transmission for both radio and television

The growth in the number of stations has clearly outstripped the increase in funding. Government funding covers no more than 20% of the running costs of ethnic community broadcasting. The other 80% comes from donations, appeals, membership fees and occasional sponsorships.

Further, the Community Broadcasting Foundation estimates that only around 12% of the total turnover of all community broadcasters comes from federal government grants. Many services, including general broadcasters and community television, currently get no funding support at all. However, what support is received is crucial to the viability of many services and their ability to expand into other services, like education.

The additional funding required for ethnic broadcasters is included as part of the overall funding submission to the federal government, developed jointly by the Funding Strategy Group, comprising the peak organizations across community broadcasting, including the NEMBC. That submission calls **for \$16.8m in new funding, in addition to the \$8.1m currently provided by the federal government.**

The **additional** \$16.8m sought by the community broadcasting sector is in four key areas:

	\$m
Content	7.24 (1.9m extra for ethnic broadcasters)
Training	2.75 (see below)
Infrastructure	5.04 (see below)
Sector Coordination and Planning	<u>1.84</u>
	16.87 (plus the current \$8.1m)

The whole funding submission can be viewed online at [www.cbonline.org.au](http://www.cbonline.org.au). A copy is attached at Attachment 1.

## 6. Funding priorities for ethnic community broadcasting

For ethnic broadcasters there are particular priorities, especially the per/hour funding of program content and training resources:

**1. Program Content Funding:** In order to continue to develop dedicated and specialist programming and content there is a need for an increase in this funding (provided only to ethnic, indigenous and print handicapped programmers) which provides subscriptions, phone links and other facilities to improve program quality. The growth of community broadcasting stations has meant an actual decline in the per hour rate for content production (from \$48 per hour in 1996 to \$38.52 in 2005/6 \$35.35 in 2006/7). The joint submission recommends an additional amount of



\$1.893 million for ethnic broadcasters to bring funding back to 1996 levels (a boost from the current \$1.35m to around \$3.2m).

**2. Training:** Training is the life-blood of community radio and the National Training Project (NTP) has, during a four-year pilot, proven to be of enormous value to stations, broadcasters and volunteers. There is a pressing need for the NTP to be funded beyond 2008 when the pilot project ends. The submission seeks \$2.8m per year for community broadcasting as a whole. With the demise of the Australian Ethnic Radio Training Project (AERTP) in 2004, which provided over \$200,000 per year, the NEMBC seeks a similar amount for the development and delivery of dedicated training for ethnic community broadcasters.

**3. Infrastructure:** Current infrastructure for community broadcasters is often outdated and inadequate, with 207 radio stations having been in operation for more than a decade and 67 for more than 20 years (over half of all stations). In order to address this need for new capital equipment the sector wants to create a Community Radio Infrastructure Renewal and Development Fund (\$3m).

**4. Sector Coordination & Planning:** Funding is required to improve staffing in representative organisations, like the NEMBC, and to support the creation of a Strategic Planning and Development Unit (SPDU) for community broadcasting (total of \$1.8m additional funds sought).

#### Value for money

Ethnic community broadcasting produces more than four times the hours of the fully government funded SBS services. The table tells the story.

	<b>SBS 2004/5</b>	<b>Ethnic Community Radio 2005/6</b>
Program hours	15,500	66,480
Number of languages	68	97
Cost per hour	\$2258.00	\$38.52 (\$35.35 in 06/07)

Dollar for dollar the ethnic community sector produces **more for less** and reaches further. We are not arguing that SBS should get less funding – far from it. However, we believe it indicates the significant under-funding of community ethnic broadcasters.

## 6. Conclusion

We hope that we have made an argument that community broadcasting is an existing means by which the knowledge about history, frameworks and values can be delivered into emerging and established migrant communities, in their own language and in an accessible way. This is regardless of whether there is a formal testing regime about general knowledge of Australia.

The NEMBC is sceptical about the purported value in expanding and formalising and expanding. This is particularly so given the large discretion retained by the Minister as to the content and level of knowledge required in the test.

However, we understand it will proceed by agreement of both major parties. What concerns us that the test will be devised and implemented at great cost, but the actual knowledge and commitment on the new citizens may have improved very little.

Unless considered education and information processes underpin the test, then there will be minimal residual legacy. It may be like tests we are all familiar with - a cramming exercise, but with little lasting knowledge.

We note the contribution in the House of Representatives on 22 June by Mr Tony Burke, Member for Watson and Shadow Minister for Immigration. He proposed an amendment to the legislation that proposed:

*whilst not declining to give the bill a second reading and whilst welcoming the formalising of the current test for Australian Citizenship, the House:*

- (1) notes that the issue is whether the citizenship tests to be determined under the legislation are reasonable;*
- (2) notes the importance of teaching in the development of English language skills and the acquisition of knowledge of Australian history, culture and values; and*
- (3) calls on the Government to provide improvements to the Adult Migrant English Program and other settlement services to assist migrants to participate fully in the Australian community and to pass the citizenship test.*

We would support the intention of the Shadow Minister's amendment, especially in acknowledging the value of AMES in assisting migrants to learn English effectively and to understand the background to test questions. However, we would have urged him to go further and consider the vital role played by ethnic community broadcasting in the daily lives of migrants and the enormous potential that this informal mechanism might have in spreading knowledge about, and commitment to, Australian history, political and legal institutions and values.

Professor George Williams in his submission to this Senate Inquiry has highlighted the generally deplorable state of public knowledge about Australian history, legal framework, institutions and political system. As evidence he cites a number of polls including those conducted in relation to the understanding of civics in the early 1990's. He concludes:

*One of the reasons why governments fail to do their job is because people do not know enough to hold politicians to account. Where people do not understand how things work, it can be easier for our elected representatives to avoid scrutiny and to deflect blame.*

*It would be good for new citizens to have this knowledge. However, before we ask it of them, we also should take a hard look at ourselves. New citizens should know how our systems work, but so should we.*

*We need more investment in education to make sure that not only new, but also current citizens, have the information they need to be good Australians.*

We can only agree that this educational role is vital for all Australians, to make each of us 'conscious citizens' to use the phrase coined by Canadian writer John Raulston Saul in his book *The Unconscious Civilization*. The ethnic community broadcasting sector can play such a role in educating and connecting migrants (both new arrivals and settled migrants) to values, debates and 'civics'.

To a degree the broader community broadcasting sector already does this. However, resource, funding and training constraints make it hard for stations and

individual programmers to be strategic or systematic about this. A modest investment in ethnic community broadcasting would enable this to happen.

We argue that more developed knowledge can also be conveyed to all Australians over time by the broader community broadcasting sector, not just ethnic programmers. Many migrants listen to general community broadcasting in English as well as their own community language programs.

1. Meadows, M., Forde, S., Ewart, J., & Foxwell, K. (2007). "Community Media Matters". Brisbane: Griffith University. Available at: <http://www.cbonline.org.au>.
2. "Community Radio National Listener Survey", McNair Ingenuity Research, August 2006 at Page 32. Available at: [http://www.cbonline.org.au/media/mcnair\\_survey\\_06/McNair\\_Report.pdf](http://www.cbonline.org.au/media/mcnair_survey_06/McNair_Report.pdf)
3. Statistics available from [www.cbonline.org.au](http://www.cbonline.org.au)
4. "Community Media Matters", Griffith University at Page 63 Available on <http://www.cbonline.org.au/>
5. This estimate uses the same method established by Forde, S., Meadows, M., and Foxwell, K (2002). Culture, Commitment, Community: The Australian Community Radio Sector. Brisbane: Griffith University. Available on <http://www.cbonline.org.au/>
6. ABC submission to the House of Representatives – House Standing Committee, Department of Communications, Technology and the Arts Inquiry, prepared by Russel Balding. Available at [http://www.aph.gov.au/house/committee/cita/community\\_broadcasting/subs/sub7.pdf](http://www.aph.gov.au/house/committee/cita/community_broadcasting/subs/sub7.pdf)
7. "Community Radio National Listener Survey", McNair Ingenuity Research August 2006 at Page 32. Available at: [http://www.cbonline.org.au/media/mcnair\\_survey\\_06/McNair\\_Report.pdf](http://www.cbonline.org.au/media/mcnair_survey_06/McNair_Report.pdf)