

10 December 2024

Recommendations

This submission recommends that the Department:

- > Adopts a capabilities-led approach to facilitate programs that reflect community and consumer need.
- > Support the use of translation services and the development of resources in a range of accessible formats.

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**the Department**) on the draft combined grant opportunity guidelines (**the Draft Guidelines**) for the First Nations Digital Support Hub and Network of Digital Mentors programs (**the Programs**).

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

ACCAN welcomes the Draft Guidelines as an important step in supporting the digital ability and literacy of First Nations Australians.

Introduction

Supporting the digital ability and literacy of First Nations communities through the Programs is vital to addressing the digital divide. ACCAN supports the Draft Guidelines as a significant step in enhancing the digital skills and literacy of First Nations peoples and communities across Australia.

Adopt a capabilities-led approach

ACCAN recommends that the Department use a capabilities-led approach to support the Programs to be responsive and culturally appropriate.

Amartya Sen's capability approach provides a valuable lens for addressing communication challenges in First Nations communities by illustrating that communication services are not merely a resource but a critical capability that influences a person's ability to access education, healthcare, cultural connection, and economic participation. Furthermore, making the Programs capabilities-led allows for changes in consumers' experiences and expectations over time.

To support a capabilities-led approach, ACCAN suggests that the Department set aside 5-10% of overall funding for innovative proposals and trial projects (with evaluations) that may emerge during the Programs' community engagement.

Recommendations – Draft Guidelines' amendments

Section 6 – The merit assessment criteria for the grants

ACCAN considers that Section 6, *Criterion 2 – Identification, prioritisation and development of information and training materials (10 points)* should be expanded to include resources available in First Nations languages, as well as formats like Easy English, plain English, braille, large print, and Auslan. Additionally, ACCAN suggests distributing these resources through the Programs' online channels, printed materials, and public service announcements to improve access for First Nations peoples.²

This approach enhances First Nations consumers' access to essential resources created by the Programs. An example of this is the project "Our Phones, Our Rights: Translated and Community-Appropriate Telecommunications Resources for Remote Indigenous Communities" that provided fact sheets, posters, and audio segments in Arrernte, Luritja, Pitjantjatjara, Torres Strait Island Creole, Warlpiri, and English.³

¹ Nicholas Garnham, 'Amartya Sen's capabilities approach to the evaluation of welfare: Its application to communications' (1997) 4(4) *The Public* 25, 34.

² See also, ACCAN, *2024 Regional Telecommunications Review* (Submission, Regional Telecommunications Independent Review Committee, 30 August 2024) 37.

³ ACCAN and Queensland Remote Aboriginal Media, 'Our Phones, Our Rights: Translated and community appropriate telecommunications resources for remote Indigenous communities' (Web Page, 2015) https://accan.org.au/grants/completed-grants/1127-our-phones-our-rights.

Conclusion

ACCAN welcomes and supports the Programs as an important step to closing the digital divide by supporting the digital ability and literacy of First Nations Australians.

ACCAN thanks the Department for the opportunity to comment on the Draft Guidelines. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at amelia.radke@accan.org.au.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. Read our RAP.