Indigenous Digital Inclusion Plan

Submission by the Australian Communications Consumer Action Network Indigenous Steering Committee to the National Indigenous Australians Agency

5 November 2021

Australian Communications Consumer Action Network (ACCAN)
Australia's peak telecommunications consumer organisation

PO Box A1158, Sydney South NSW 1235
Tel: (02) 9288 4000 | Contact us through the National Relay Service
www.accan.org.au | info@accan.org.au | twitter: @ACCAN_AU

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

About the Indigenous Steering Committee

Discussions at ACCAN's 2021 Indigenous Advisory Forum meeting resulted in the decision that an Indigenous Steering Committee would be formed to guide ACCAN's work to close the digital divide for Indigenous consumers.

The goals and priorities of the Indigenous Steering Committee include:

- Empowerment of communities to make culturally appropriate decisions, such as using Wi-Fi networks to allow for more community control, modification of mobile networks to allow for content restrictions.
- Programs to build confidence in communities by developing the skills needed to deal with scams, gaming, social media, and training and support.

Dr Heron Loban of Griffith University chairs the Indigenous Steering Committee. The Steering Committee is comprised of First Nations peoples with expertise and interest in telecommunications issues.

Although the Indigenous Steering Committee is in its early days, ACCAN is committed to supporting the Committee by coordinating policy positions and background papers, arranging advocacy opportunities, developing targeted consumer information resources when needed, and media promotion. The role of the Steering Committee is to guide this work so that it is genuinely representative of the interests of First Nations peoples.

PO Box A1158,
Sydney South NSW, 1235
Email: info@accan.org.au
Phone: (02) 9288 4000
Contact us through the National Relay Service

Contents

1. Executive Summary

ACCAN's Indigenous Steering Committee would like to thank the NIAA for the opportunity to provide a submission to this important consultation.

Digital inclusion and connectivity are essential for so many parts of daily life, and as such, the means to get and stay connected must be available to everyone across Australia. Given that digital inclusion rates differ between diverse groups of people, concentrated efforts must be made to support equity for groups currently being left behind. We are pleased that First Nations peoples have been identified as a group that would benefit from targeted efforts to help ensure more equitable rates of digital inclusion.

We strongly believe that all digital inclusion efforts within the Indigenous Digital Inclusion Plan (IDIP) must be developed and led by First Nations peoples and community-controlled organisations. It is only from this basis that genuine, sustained progress can be made towards improved digital inclusion for all First Nations peoples, regardless of where in Australia they live. Given the enabling role of communications goods and services and the essentiality of connectivity in today's day and age, it is critical that the Federal Government prioritises this work by providing ongoing funding to First Nations communities and community-controlled organisations to implement place-based solutions to the current digital divide. Furthermore, funding must also be made available for research to gather data on First Nations access and use of digital services, as a key first step towards measuring progress towards the new Closing the Gap target relating to digital inclusion.

We welcome any further discussion about the points we have raised in our submission and are keen to assist the NIAA with the implementation of our recommendations.

1.1. List of recommendations

Recommendation 1: That the IDIP recognises the essentiality of First Nations led efforts to address digital inclusion and allocates resourcing to facilitate First Nations communities and community-controlled organisations to lead this work.

Recommendation 2: That the IDIP and digital inclusion initiatives established by the Plan include all First Nations peoples regardless of where they live.

Recommendation 3: That the IDIP and digital inclusion initiatives established by the Plan acknowledge the enabling role of digital inclusion with respect to other Closing the Gap outcomes.

Recommendation 4: That the Federal Government coordinate and oversee digital inclusion initiatives targeting First Nations communities and work closely with First Nations communities, States and Territories to develop local strategies and place-based solutions to reduce the digital divide.

Recommendation 5: That the IDIP clearly designate responsibility to different public and private stakeholders to ensure robust accountability mechanisms are built in from the beginning. Furthermore, the IDIP must specify that First Nations representatives be involved in monitoring and reporting against the IDIP.

Recommendation 6: That the NIAA be entirely transparent about where funding for the IDIP has come from and how it is being used.

Recommendation 7: That the NIAA ask the Parliamentary Budget Office to quantify the economic cost of the First Nations digital divide to all levels of government, to identify the cost of continued inaction and identify a budget to dedicate to IDIP actions into the future.

Recommendation 8: That NBN Co works with stakeholders to develop solutions that provide increased capacity and performance on shared community Wi-Fi services over Sky Muster.

Recommendation 9: That Telstra continues to maintain its public phones and that the ACMA Payphone Guidelines are updated to reflect recent changes in public phone call charging arrangements, while maintaining clear guidance for assessing the impact of public phone removal.

Recommendation 10: That the Federal Government invests in local-level, community-informed and co-designed solutions to resolve mobile connectivity gaps in First Nations communities.

Recommendation 11: That the Mobile Black Spot Program funding increase incentives for Mobile Network Operators to provide open access to other Mobile Network Operators, with a focus on funding network neutral proposals.

Recommendation 12: That future rounds of the Mobile Black Spot Program revise selection criteria to give a higher grading to proposals that would bring social and economic benefits to remote communities.

Recommendation 13: That the Federal Government consults on and invests in solutions to improve the affordability of satellite broadband services and pay-as-you-go community Wi-Fi.

Recommendation 14: That the Federal Government consider new regulatory requirements on telecommunications providers to offer affordable services targeted to people on low incomes as part of a broader review of telecommunications affordability measures.

Recommendation 15: That the Federal Government fund the upskilling of local First Nations peoples and community-controlled organisations to deliver culturally appropriate digital ability training and information.

Recommendation 16: That governments, industry and educational institutions offer incentives (such as scholarships) for First Nations youth to improve their digital skills and engage in further education relating to digital technologies.

Recommendation 17: That digital ability training be offered on country to ensure the skills and economic benefits that can arise from digital connections can stay in local communities.

Recommendation 18: That networks of First Nations digital inclusion officers or mentors be established across Australia to embed ongoing digital technology support (including peer support).

Recommendation 19: That funding bodies ensure that digital ability programs are long term, and able to provide ongoing support in communities to assist with ongoing learning.

Recommendation 20: That the Australian teaching workforce is supported and adequately resourced to enhance the digital ability of their students.

Recommendation 21: That the Federal Government allocate sufficient and ongoing funding to the delivery of digital skills programs for First Nations people, including expansion of the inDigiMOB program.

Recommendation 22: That the Federal Government, as a priority, funds First Nations data collection and analysis to support data sovereignty as outlined in Target 17 of the Closing the Gap Agreement.

2. Responses to Indigenous Digital Inclusion Plan Discussion Paper

2.1. General Comments

2.1.1. Essentiality of First Nations led approaches to digital inclusion

It is essential that First Nations peoples and communities lead not only the development of the Indigenous Digital Inclusion Plan (IDIP), but the development, delivery and evaluation of approaches and initiatives established by the Plan. This should recognise the role of First Nations youth as future community leaders, and as current digital leaders in First Nations communities.[1] Furthermore, First Nations communities and community-controlled organisations must be appropriately resourced to lead this digital inclusion work.

The IDIP must be reflective of the needs and aspirations of First Nations communities. While non-Indigenous organisations and entities have a supporting role to play, the IDIP must first and foremost engage with community-controlled organisations and services to ensure the Plan is culturally safe, locally relevant, and appropriately representative. The development of the IDIP and any initiatives it establishes must follow best practice for initiating reforms impacting First Nations peoples, including shared decision-making, community-controlled service delivery, representative voice and locally relevant programs.[2] The IDIP must recognise these cultural requirements, and as discussed below, intersecting opportunities for employment, economic development and education, as well as health and social service delivery.

> **Recommendation 1:** That the IDIP recognises the essentiality of First Nations led efforts to address digital inclusion and allocates resourcing to facilitate First Nations communities and community-controlled organisations to lead this work.

A truly inclusive and First Nations led IDIP would support the overarching outcomes at the heart of the National Agreement on Closing the Gap and would support action on the four Priority Reform areas aimed at changing the way governments work to improve the lives of First Nations peoples.[3] In addition, First Nations led efforts to improve digital inclusion could support progress on other Closing the Gap outcomes, such as those relating to education, health and employment.

---

[1] See, for instance: Stronger Smarter Institute, 2019. *Submission to the Education and Health Standing Committee regarding Digital Innovation in Secondary Education*, p2. Available: https://www.parliament.wa.gov.au/Parliament/commit.nsf/(Evidence+Lookup+by+Com+ID)/FB60CA132FE3000B482584650022FACF/$file/20190816+-+TECH+IN+ED+SUB+5+-+Dr+John+Davis+Stronger+Smarter+Institute_Redacted.pdf

[2] Pat Turner, 2021. *Indigenous Digital Leadership Forum 2021 Slides – Shaping Our Digital Futures,* First Nations Media Australia, available: https://firstnationsmedia.org.au/events/indigenous-digital-leadership-forum/indigenous-digital-leadership-forum-2021

[3] Coalition of Peaks, 2020. *National Agreement on Closing the Gap*, pp3-5. Available: https://www.closingthegap.gov.au/sites/default/files/2021-05/ctg-national-agreement_apr-21.pdf

2.1.2. Scope of the Indigenous Digital Inclusion Plan

ACCAN's Indigenous Steering Committee understands that recommendation 8 of the 2018 Regional Telecommunications Review was for the development of a targeted Indigenous Digital Inclusion program.[4] However, we are very concerned that the discussion paper omits the experiences and needs of First Nations peoples living in urban areas.

Indeed, the new digital inclusion focus, Outcome 17, introduced to the National Agreement on Closing the Gap, is that Aboriginal and Torres Strait Islander peoples have access to information and services enabling participation in informed decision-making regarding their own lives.[5] Target 17 is that by 2026, Aboriginal and Torres Strait Islander peoples have equal levels of digital inclusion.[6] This outcome and its corresponding target do not discriminate based on location. As such, it is critical that the IDIP include all First Nations peoples regardless of where they live. This inclusion of all First Nations peoples within the IDIP must be done in a way that acknowledges and respects the intersecting identities and diverse lived experiences across First Nations peoples.

This is particularly important given a greater proportion of First Nations peoples live in more urban areas than remote.[7] First Nations communities living in urban areas experience a unique set of challenges. Often these communities are less visible as they are dispersed among the broader population, and while there may be pockets of First Nations communities within urban areas, these may be hubs and not necessarily where people live.

COVID-19 has highlighted the significant digital gap affecting First Nations peoples, with many people left offline during lockdowns without access to education, employment, health or basic services.[8] We do not refute that during this time the digital divide between urban and remote areas also increased – however efforts to address this gap must not leave First Nations peoples in urban areas behind. As our submission will attest, some issues relating to digital inclusion are experienced very similarly in both remote and urban communities, in part due to shared cultural and socio-economic experiences. The IDIP must therefore be comprehensive and ensure equity for all First Nations peoples.

> **Recommendation 2:** That the IDIP and digital inclusion initiatives established by the Plan include all First Nations peoples regardless of where they live.

---

[4] Regional Telecommunications Independent Review Committee, 2018. *2018 Regional Telecommunications Review: Getting it right out there*, p61. Available: https://www.infrastructure.gov.au/sites/default/files/2018-regional-telecommunications-review-getting-it-right-out-there.pdf

[5] Coalition of Peaks, 2020 op cit. p41.

[6] Ibid.

[7] Australian Institute of Health and Welfare, 2021. *Profile of Indigenous Australians,* available: https://www.aihw.gov.au/reports/australias-welfare/profile-of-indigenous-australians

[8] First Nations Media Australia, 2021. *Indigenous Digital Leadership Forum 2021 Slides – Shaping Our Digital Futures.* Available: https://firstnationsmedia.org.au/events/indigenous-digital-leadership-forum/indigenous-digital-leadership-forum-2021

2.1.3. Digital inclusion as an enabler

We agree with the NIAA's assessment[9] that digital inclusion can lead to numerous benefits for digitally connected and capable individuals and the broader Australian society. ACCAN has long advocated that available, affordable and accessible communications products and services can support and enable the enjoyment of a range of human rights, and lead to improved opportunities for digitally connected individuals. Enhanced rates of digital inclusion can lead to greater inclusion within an increasingly digital society, including better access to healthcare and education, more inclusive workplaces and greater participation in all facets of online life. Importantly, efforts to improve the digital inclusion of First Nations communities will support greater equity for First Nations peoples more broadly.

Education

Improved digital inclusion would support greater educational opportunities for First Nations peoples. During the COVID-19 pandemic, the digital divide faced by remote First Nations communities regarding access, infrastructure, data and hardware was brought into sharp focus. This was especially the case when First Nations students returned home with the expectation from schools that they would be able to continue learning online. With internet access unreliable or unavailable in schools and homes, many students had to access classes via radio and Indigenous Community TV, and some ceased engaging in education altogether.[10] The consequence is a further widening of the education divide for First Nations children and young people due to inequitable access to online learning. The IDIP must address the disadvantages arising from this gap, including through the development of initiatives remediating these inequities in the short, medium and long term. Furthermore, the IDIP must look at digital inclusion and education holistically and consider how improved digital inclusion can support and enhance connection to culture and Country for First Nations students.[11]

Health

In terms of healthcare, improved digital inclusion would support greater opportunities to use telehealth for diagnostics and treatment. This would enhance social and emotional wellbeing for First Nations peoples, by offering improved access to culturally safe and appropriate healthcare. This increase in wellbeing in turn would have positive flow on effects in many other areas, including participation in education, employment and other social and cultural parts of life.

Employment

When considering employment, improved digital inclusion could enable significant, substantial and high impact opportunities for economic empowerment, particularly in remote and regional areas. The First Nations business sector has grown substantially in the past few decades, and it is estimated there

[9] As outlined in the NIAA IDIP discussion paper (p4).

[10] The Australian Literacy and Numeracy Foundation and World Vision Australia, 2021. *Connecting on Country*, available: https://www.worldvision.com.au/docs/default-source/publications/government-submissions/connecting-on-country.pdf

[11] Stronger Smarter Institute, 2019 op cit. p2.

are around 12,000 small First Nations businesses in Australia.[12] Despite this growth, 'business ownership parity with broader Australia would translate into approximately 78,000 Indigenous businesses.'[13] Unreliable, unaffordable or otherwise inappropriate communications infrastructure and services means that First Nations peoples in regional and remote areas are unable to participate in the increasing opportunities that ought to be available in these areas to First Nations businesses.[14] This includes opportunities to grow their businesses using social media or other online forms of promotion that are widely available to First Nations peoples in other parts of the country where infrastructure and services are more equitably available. Through co-design with First Nations communities and businesses, local aspirations and capabilities for business creation and expansion can and must be reflected and nurtured through initiatives established by the IDIP.

Government service delivery

Furthermore, connectivity is necessary for online Government service delivery.[15] Increasingly, State, Territory and Federal Governments require and rely on service interactions to be done online or on the phone. The move to online government service delivery is convenient and financially beneficial for governments[16] however these benefits must not come at a social, economic or cultural cost to First Nations people because of where they live. The shift of essential Government services to online-only channels must be accompanied by a corresponding financial investment in digital inclusion targeting First Nations peoples.

Intersection with other Closing the Gap targets

Given the Plan's intersecting relationship with other Closing the Gap targets and outcomes, it must be recognised that digital inclusion efforts and initiatives cannot be discussed or implemented in isolation. A strong approach would be one that considers the impacts of digital inclusion initiatives in relation to other efforts aimed at greater equity for First Nations peoples. The IDIP must therefore highlight the interconnections between steps taken as part of Outcome 17 and other Closing the Gap outcomes that are dependent on the level of digital inclusion. Indeed, as asserted by one of the Steering Committee's members to a previous consultation, 'accelerating intercultural digital capability is critical to ensuring equity of opportunity'.[17]

> **Recommendation 3:** That the IDIP and digital inclusion initiatives established by the Plan acknowledge the enabling role of digital inclusion with respect to other Closing the Gap outcomes.

[12] PricewaterhouseCoopers Indigenous Consulting, 2021. B*acking Black business: greater financial inclusion for Australia's Indigenous business sector*, published by Minderoo Foundation, p3. Available: https://cdn.minderoo.org/content/uploads/2021/02/05095444/Backing-Black-Business_210205_FNL_P.pdf

[13] Ibid.

[14] Ibid p16.

[15] First Nations Media Australia, 2021 op cit.

[16] Deloitte Access Economics 2015, *Digital government transformation*, https://www2.deloitte.com/global/en/pages/public-sector/articles/digital-government-transformation.html

[17] Stronger Smarter Institute, 2019 op cit.

2.1.4. The role of government

As outlined above, the IDIP and the initiatives it establishes must be community-led and recognise the strengths and capabilities of First Nations peoples. It is critical that all levels of government take this strengths-based approach when working with First Nations communities on issues relating to digital inclusion.

Understanding the lived experience of First Nations peoples

Anecdotal feedback received by the Indigenous Steering Committee is that governments do not thoroughly understand the lived experiences of First Nations peoples, and that the high-level perspectives of governments are insufficient when attempting to address intersectional and systemic issues. First Nations peoples and communities understand their differing experiences best, including how certain lived experiences (for instance, of institutional racism, poverty, and inadequate access to essential services) can influence rates of digital inclusion. As such, governments must be led by these perspectives to ensure that efforts to address digital inclusion for First Nations peoples are not wasted and result in equitable outcomes.

Understanding the needs and priorities of First Nations peoples

All levels of government have a role to play in ensuring the IDIP meets the needs and expectations of First Nations peoples across Australia. Governments must ensure the needs of First Nations peoples and communities do not fall through existing infrastructure, service, policy, or program gaps. As outlined above, access to communications is a basic and fundamental human right and must be recognised as such by governments. In addition to being party to core international human rights instruments, Australia has noted its support of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).[18] Despite this support, however, current systemic exclusion from online connectivity marginalises and creates significant disadvantage for excluded communities, bringing into question Australia's commitment to the principles of the UNDRIP.

Coordination of efforts across government

Currently, there is an absence of any specific programs to address First Nations communications needs, with limited investment in targeted programs at a federal level.[19] Lack of coordination has resulted in digital exclusion being worse in some states than others, which is not a positive outcome – especially considering the essentiality of communications and the new focus on digital inclusion within the Closing the Gap Agreement. The COVID-19 pandemic has further highlighted how vital communications are and that the failure by government to provide basic access to communications can have life and death consequences for First Nations peoples.

The Federal Government must ensure that the IDIP is understood and prioritised across all Federal Government departments and must work closely with State and Territory counterparts to eliminate the digital divide. A more coordinated approach in which all levels of government work together,

[18] As outlined: https://www.ag.gov.au/rights-and-protections/human-rights-and-anti-discrimination/international-human-rights-system

[19] Featherstone, Daniel, 2020. *Remote Indigenous Communications Review: Telecommunications Programs and Current Needs for Remote Indigenous Communities*, Australian Communications Consumer Action Network, Sydney. Available: https://accan.org.au/accans-work/research/1821-remote-indigenous-communications-review-telecommunications-programs-and-current-needs-for-remote-indigenous-communities

alongside First Nations communities, to determine place-based approaches to digital inclusion will deliver the best outcomes.

> **Recommendation 4:** That the Federal Government coordinate and oversee digital inclusion initiatives targeting First Nations communities and work closely with First Nations communities, States and Territories to develop local strategies and place-based solutions to reduce the digital divide.

Accountability

The Federal Government clearly has an important role to play in coordinating efforts to improve digital inclusion (including programs aimed at increasing digital capabilities).[20] To support the Federal Government, the IDIP must clearly describe the roles, responsibilities and obligations of different Federal Government departments against elements of the Plan. This would improve transparency and accountability and would help First Nations communities to better understand who is accountable for the different digital services or supports they may need. Furthermore, the Plan must clearly identify the commitments being made by different levels of governments (and indeed the private sector) to work alongside First Nations communities and community-controlled organisations to improve digital inclusion. Finally, given the timeliness of this issue, and the Closing the Gap Target that aims for significant change by 2026, it is critical that the IDIP include annual reporting on initiatives undertaken as part of the Plan. First Nations peoples and community-controlled organisations must be actively involved in any monitoring or reporting against the IDIP into the future.

> **Recommendation 5:** That the IDIP clearly designate responsibility to different public and private stakeholders to ensure robust accountability mechanisms are built in from the beginning. Furthermore, the IDIP must specify that First Nations representatives be involved in monitoring and reporting against the IDIP.

2.1.5. Funding

ACCAN's Indigenous Steering Committee was concerned to learn at virtual roundtables held by NIAA that no dedicated funding has been made available for activities under the IDIP. Our understanding is that instead, existing investments will be leveraged to progress activities under the IDIP. We seek assurances that funding for the IDIP and any associated efforts progressed under the Plan will not be diverted from funds addressing the existing Closing the Gap initiatives.

Given the essentiality of this Plan, the enabling potential of digital inclusion and its close intersections with Closing the Gap targets and outcomes and Federal Government efforts such as the Digital Economy Strategy and the work of the Australian Broadband Advisory Council and Digital Technology Taskforce, it is vital that initiatives emerging from the IDIP are appropriately resourced. As mentioned earlier, this must include dedicated resourcing for First Nations peoples, communities and organisations to lead this important work.

Indeed, we believe that providing dedicated funding to a First Nations led approach to addressing digital inclusion would cost less than the economic costs associated with the current digital divide. We

[20] Australian Digital Inclusion Alliance (ADIA), 2020. *A National Digital Inclusion Roadmap,* available: https://www.digitalinclusion.org.au/a-national-digital-inclusion-roadmap

urge the Federal Government to consider this in more detail in close collaboration with First Nations communities.

> **Recommendation 6:** That the NIAA be entirely transparent about where funding for the IDIP has come from and how it is being used.
>
> **Recommendation 7:** That the NIAA ask the Parliamentary Budget Office to quantify the economic cost of the First Nations digital divide to all levels of government, to identify the cost of continued inaction and identify a budget to dedicate to IDIP actions into the future.

2.2. Access

While digital inclusion efforts must address First Nations communities across Australia, efforts in relation to access and infrastructure must primarily address the ongoing issues experienced in remote areas. As such, our comments in this section mainly relate to the experiences of remote First Nations communities.

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

ACCAN has long been concerned about digital exclusion in remote Indigenous communities, particularly due to the inadequacy and limited availability of communications infrastructure in these areas.[21] ACCAN's Remote Indigenous Communications Review of all current and past major remote Indigenous digital inclusion and infrastructure programs since the 1990s[22] found substantial developments and improvements in broadband access and availability in some states, but minimal investments in others. Indeed, reports indicate that the digital divide facing First Nations peoples in remote communities – and in other areas – is widening.[23][24]

As identified in the Remote Indigenous Communications Review,[25] last mile access remains an issue for many remote First Nations communities. This is a major factor that must be considered in the IDIP, as it speaks to the need for local, place-based and First Nations led solutions to be developed. A related issue is the need for timely technical support, which can be challenging given the remoteness of these communities. A solution to this could be training and upskilling members of local communities to be able to fix telecommunications issues as they arise, and improvements to service reliability.

Additionally, we urge the NIAA to not only consider access to infrastructure, but also the importance of equity and continuity of access when developing the IDIP. Although telecommunications services

---

[21] ACCAN, 2021a. *Regional Telecommunications Review 2021,* available: https://accan.org.au/accans-work/submissions/1921-2021-regional-telecommunications-review

[22] Featherstone, 2020 op cit.

[23] SBS News, 2021. *Indigenous students face a digital divide and were 'unfairly disadvantaged' during coronavirus lockdowns, says a report,* available: https://www.sbs.com.au/news/indigenous-students-face-a-digital-divide-and-were-unfairly-disadvantaged-during-coronavirus-lockdowns-says-a-report/25c70b42-4594-407f-b47a-2aa12c9654bc

[24] ACCAN, 2020. *Youth Check-In Research Report*, available: https://accan.org.au/our-work/research/1813-accan-youth-check-in-research-report

[25] Featherstone, 2020 op cit.

may technically be available in certain areas, outages may mean that these services are only intermittently available or are insufficient to engage meaningfully in work or study. As such, discussions regarding continuity of access to telecommunications services must go hand in hand with discussions relating to the reliability of power supply in various parts of Australia. For satellite services this must include consideration of service robustness to ensure these offerings can withstand the impacts of seasonal weather without significant degradations to service quality.

2.2.2. 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? a. Are there issues in connecting to or using available satellite services in regional and remote areas? Are there issues with satellite latency? b. 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?

The Remote Indigenous Communications Review identified barriers preventing First Nations peoples in remote communities from engaging online, including issues relating to 'affordability, lack of last mile delivery or community access facilities, issues with service reliability and congestion, and barriers to engagement with online services.'[26] The experiences of these issues differ depending on local variables including remoteness, community size and availability of local digital champions.

ADSL and fixed voice services

In relation to ADSL, between 21st June – 27th July 2021 ACCAN ran an online survey to understand consumers' experience of their ADSL service for those who have either satellite or fixed wireless technology available at their premises.[27] While this survey was not specific to First Nations consumers, nor to shared or community ADSL connections, the results indicated that consumers generally do not consider a satellite or fixed wireless connection to be of equivalent quality to their current ADSL service. This was primarily due to reliability, speed, latency and cost issues. These findings must be considered in relation to the IDIP and any future infrastructure investments it identifies.

Indeed, these findings are particularly important to consider given reports that the ADSL network has been switched off in some Indigenous communities, for example Papunya and Ntaria in the Northern Territory.[28] This has prompted community members and organisations to switch services to NBN Sky Muster, including community Wi-Fi services. Some communities are concerned about this switch, particularly in relation to the limitations of satellite broadband performance with increased latency impacting the quality of video conferencing and voice calls, as well as concerns with affordability and data limitations. While in most cases Sky Muster services theoretically perform better and are more reliable than ADSL services, some communities have experienced poorer network performance after switching from ADSL services to Sky Muster.[29] In particular, the data limitations for community Wi-Fi

[26] Ibid p9.

[27] ACCAN, 2021b. *Wholesale ADSL service declaration inquiry 2021,* available: https://accan.org.au/accans-work/submissions/1913-wadsl-2021

[28] Central Australian Youth Link-Up Service (CAYLUS), 2021. *Submission to the Regional Telecommunications Review 2021.*

[29] Ibid.

are a significant issue, as even with Sky Muster Plus the maximum data available for the community is 300GB for video streaming and VPN access.

> **Recommendation 8:** That NBN Co works with stakeholders to develop solutions that provide increased capacity and performance on shared community Wi-Fi services over Sky Muster.

While the Universal Service Obligation ensures access to fixed voice services upon reasonable request, cost and use barriers have reduced take up in remote First Nations communities. As identified in the Remote Indigenous Communications Review, mobile services and Wi-Fi calling are alternatives that in some instances are preferrable to a fixed voice service.

Public phones

In relation to another shared service, public phones are still heavily relied upon in many remote communities. For some First Nations peoples living in remote communities, public phones are the only way to access voice services and the essential connections they facilitate – including for instance income support and emergency services. [30] While we welcome Telstra recently announcing that public phones will be generally made free of charge for the community, we are keen to ensure that this change will not impact the maintenance or indeed the availability of public phones. Telstra must routinely maintain its public phones to ensure those who need to use these public facilities are able to do so.

> **Recommendation 9:** That Telstra continues to maintain its public phones and that the ACMA Payphone Guidelines are updated to reflect recent changes in public phone call charging arrangements, while maintaining clear guidance for assessing the impact of public phone removal.

Satellite services

NBN Sky Muster has delivered significantly improved services for remote communities, however there are still barriers to access and use that need to be overcome. For communities using Sky Muster for community Wi-Fi or home broadband, the following barriers remain:

- Reliance on power supply means that services are unavailable if power is interrupted, and there is no back up power.
- The services are affected by heavy cloud coverage and rain fade.
- There are data and speed limitations, noting data improvements on Sky Muster Plus services.
- Latency can impair video conferencing preventing access to telehealth and other applications. [31]

[30] Featherstone, 2020 op cit.

[31] Ibid, section 8.3.

There are very low rates of home internet access in remote communities, due primarily to the affordability barriers of service and device costs.[32]

Mobile services

Mobile coverage is a key factor that reduces digital access for First Nations peoples. Mobile coverage remains patchy in many locations and access to vital services like telehealth, emergency services, income support, and online learning can be limited and even prevented by poor network reliability and performance.[33] There have been many reports about lack of mobile connectivity, including, for instance, in Wujal Wujal where local communities 'have to type a text on their phones and then throw it in the air repeatedly to access enough signal to send it.'[34] As noted in the Remote Indigenous Communications Review[35], most large remote communities have access to Telstra mobile coverage delivered via base stations using fibre backhaul or more recently small cells using satellite backhaul. However, there are numerous issues that impact access to services:

- Many smaller communities have no mobile coverage.
- Some communities are served by 3G only with limited service performance.
- Mobile towers have limited battery life, and power is often unreliable in remote communities.
- Small cells provide a cost effective solution, but there are reports of congestion and service deterioration as usage increases.

Improvements to mobile coverage are urgently needed to contribute to more equitable access to communications services for First Nations peoples.

> **Recommendation 10:** That the Federal Government invests in local-level, community-informed and co-designed solutions to resolve mobile connectivity gaps in First Nations communities.

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

Mobile Black Spot Program and State government co-contributions

The WA Government, in conjunction with the Federal Mobile Black Spot Program (MBSP), has successfully provided mobile coverage to many remote communities since 2012. The Remote Indigenous Communications Review details this approach and has identified the WA Government's

---

[32] Rennie, Ellie, Crouch, Andrew, Wright, Alyson and Thomas, Julian 2011, *Home Internet for Remote Indigenous Communities*, Australian Communications Consumer Action Network, Sydney. Available: https://accan.org.au/component/content/article?id=345. See also The Australian Literacy and Numeracy Foundation and World Vision Australia, 2021 op cit.

[33] ACCAN, 2021 op cit.

[34] Bowen, Ben, 2020. *Covid-19 highlights our digital divide. Technology is key to better outcomes for Indigenous Australians*. The Guardian. Available: https://www.theguardian.com/commentisfree/2020/oct/01/covid-19-highlights-our-digital-divide-technology-is-key-to-better-outcomes-for-indigenous-australians

[35] Featherstone, 2020 op cit., section 8.2.

work as a model for other states.[36] However, the MBSP is limited given it relies on commercial contributions by the industry, and mobile network providers are at a point where there is minimal return on their investment in regional, rural and remote areas. As such, more government funding is required to ensure remaining gaps in mobile coverage can be resolved. Other solutions, including network neutral proposals whereby wholesale-only operators build towers and make equipment available on an open-access basis to mobile providers, should be considered as a way to increase competition and connectivity in regional and remote parts of Australia.[37]

> **Recommendation 11:** That the Mobile Black Spot Program funding increase incentives for Mobile Network Operators to provide open access to other Mobile Network Operators, with a focus on funding network neutral proposals.
>
> **Recommendation 12:** That future rounds of the Mobile Black Spot Program revise selection criteria to give a higher grading to proposals that would bring social and economic benefits to remote communities.

Regional Connectivity Program

We support the Regional Connectivity Program (RCP) as it offers greater flexibility and scope for location-specific initiatives. This may contribute to the RCP's future success in addressing the needs of those living in remote communities. We are aware of 13 projects funded under the RCP which will directly impact the connectivity of First Nations communities. Indeed, ACCAN endorsed two successful bids by Australian Private Networks (Activ8Me) aimed at deploying community Wi-Fi and VoIP telephone solutions to First Nations communities in Jigalong and Kalumburu. While it is too early to determine the success of these and other projects targeting First Nations communities, we are aware that in many instances First Nations communities were involved in the project development. We would be keen to see similar involvement of First Nations communities and perspectives in the evaluation of these projects.

NBN Communities in Isolation program

We understand that NBN Co has expanded its existing Communities in Isolation program and is considering making this a longer term solution. Under this program, NBN Co is providing free Wi-Fi services to around 50 communities, and the expansion and continuation of this initiative is a positive outcome for people living in remote communities.

CAYLUS computer room program

Central Australian Youth Link-Up Service (CAYLUS) currently works with a range of partners to establish computer rooms in communities around Alice Springs and in other remote communities. In these spaces, computers are available for public use, and play a crucial role in enabling access to essential services such as government websites, internet banking and education.

---

[36] Featherstone, 2020 op cit., section 2.1.

[37] ACCAN, 2021a op cit., p20.

Community Wi-Fi in remote communities

As outlined in the Remote Indigenous Communications Review,[38] the WA government has been involved in the delivery of community wide Wi-Fi Mesh in partnership with NBN Co and Australian Private Networks (APN/Activ8Me). The Tjuntjuntjara community reported being very pleased with the outcomes of this project, and as such it is important to learn from the successes of this project (as well as the ongoing issues being experienced in these communities). For instance, a key feature of this project was allowing people greater portability in relation to their community Wi-Fi vouchers, which were able to be used across two sites. This feature could be incorporated into other community Wi-Fi offerings to allow greater flexibility for First Nations communities.

Interim mobile solution during COVID-19

During COVID-19 lockdowns an interim solution to increase connectivity was put in place in Wilcannia.[39] Locals have reported that this initiative was welcome and has resulted in strong Wi-Fi signals across town. People are using the increased connectivity to seek work or engage in online learning. However, there have been some concerns that the benefits gained by the roll out of this temporary measure may not be guaranteed into the future. While there are welcome reports that a permanent small cell will be installed in Wilcannia, the fact that it took a public health crisis to get this result speaks to the need for robust and long-term connectivity solutions to be proactively identified and implemented alongside communities.

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

As identified by the Remote Indigenous Communications Review, place-based solutions are needed to address existing barriers to digital inclusion, including:

- Last-mile delivery to enable household or individual access,
- Quality and reliability of services,
- Demand for increased broadband speeds and data limits, especially to enable use of streaming services and high-bandwidth applications,
- Providing community access facilities for those without personal devices
- Timely technical support and effective response times for installation and repair of equipment
- Appropriate IT systems to address congestion and latency for remote servers and two-way high bandwidth applications such as telehealth,
- Digital skills and cyber-security issues,
- Accessibility of online services for people with limited English/text literacy or disability, and
- Cultural and contextual awareness of service providers working with remote communities.[40]

[38] Featherstone, 2020 op cit., section 2.1.3.

[39] Marshall, Callum, 2021. *Wilcannia community to receive mobile, internet support during COVID outbreak*, ABC News, available: https://www.abc.net.au/news/2021-09-03/wilcannia-connectivity-bolstered-during-covid-outbreak/100422852

[40] Featherstone, 2020 op cit.

As discussed below, the affordability of devices and services, as well as investment in digital skills, are also areas in urgent need of action. There is a greater need for affordable, reliable internet, including mobile data which is often the preferred way of accessing the internet.

In addition to the infrastructure challenges, access to telecommunications services may be impacted by whether people have capacity to pay for those services. First Nations peoples on limited incomes may experience gaps in access if they are unable to afford to pay their bills or can only afford to top up their pre-paid services intermittently. An initiative relating to the payment options available for different types of telecommunications services could consider this access barrier in more detail. For example, a report by SACOSS found that many low income consumers choose pre-paid mobile phone plans because those plans provide them with the greatest control over how much and when they pay for their telecommunications.[41] As long as pre-paid consumers are not charged a premium compared to post-paid plans, consideration should be given to the expansion of pre-paid payment methods to other types of connections (including fixed line services).

Another initiative to support greater access could be technical support programs to assist communities to get and stay connected. As mentioned above, timely technical support is essential to ensuring reliable access to telecommunications services. The development of locally tailored programs to upskill and develop the capacity of community members to provide this support could help address this need. This must be First Nations led and consider how Remote Indigenous Media Organisations (RIMOs) and existing programs like inDigiMOB and Deadly Digital Communities could support this work.

It is vitally important that people know what infrastructure and connections are available to them, as well as how to access them. We are aware of some communities calling for industry to improve local infrastructure, including meeting with politicians of varying levels to discuss this need, only to be advised that they need to email certain other politicians or industry representatives. This is a barrier to participation and self-advocacy for that community, some of whom have a lower education level, while others do not have access to devices to participate in virtual conversations or prepare emails or submissions. Steps to reduce the amount of bureaucracy involved in trying to get better infrastructure would be greatly appreciated by these communities.

In relation to this, ACCAN has created a guide, in consultation with mobile network operators, that sets out steps to help communities understand what mobile network operators look for when deciding where to invest, and how to put together an effective business case for investment. It also contains information on contacts that communities can get in touch with and potentially partner with to achieve results.[42] Similarly, the Wamboin Communications Action Group (WCAG) have produced a report into their advocacy to upgrade connectivity in their local area. Resources such as these may prove helpful to First Nations communities advocating for improved connectivity and infrastructure in their local areas, however delivering this information through trusted First Nations community mentors would be a more effective way of distributing connectivity information and improving rates of First Nations connectivity.

---

[41] Ogle, Greg, and Musolino, Vanessa, 2016, *Connectivity Costs: Telecommunications Affordability for Low Income Australians*, Australian Communications Consumer Action Network, Sydney. Available: https://www.sacoss.org.au/sites/default/files/public/documents/Reports/161103_Connectivity%20Costs_accessible-web.pdf

[42] ACCAN, Community Consultation Guide, 2nd ed. http://accan.org.au/files/Community%20Kits%20-%20Mar16%20-%20Web%20Version.pdf

2.3. Affordability

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

The affordability of telecommunications products and services is a concern for many consumers across Australia. While First Nations peoples in urban areas may have better access to services and lower prices as a result of greater competition in more metropolitan areas, they may nonetheless experience affordability issues with getting and staying digitally connected. Indeed, as many people in urban, regional and remote areas experienced during the 2020 and 2021 COVID-19 lockdowns, without access to affordable telecommunications services and devices, people can be left unable to access essential services. They may therefore end up paying disproportionate costs to get and stay connected just to ensure they have ready access to critical services and supports such as Centrelink, online education or telehealth.

As identified as recently as 2020,[43] mis-selling and upselling of unaffordable products can also lead to affordability concerns for First Nations peoples in both urban and regional areas. Indeed, the Australian Competition and Consumer Commission (ACCC) fined Telstra $50 million in November 2020 for engaging in unconscionable conduct involving irresponsible and misleading sales practices targeting First Nations consumers across WA, SA and the NT. Based on recent reports and discussions with consumer advocates, we are concerned that mis-selling practice are persisting at different telco providers, with consumers ultimately paying the price. Many of these people will end up in financial hardship arrangements that don't meet their needs or may be disconnected from their telco service. The Indigenous Steering Committee is aware that consumer advocates supporting First Nations peoples are often frustrated by the weak consumer protections available to telco consumers in relation to financial hardship, including unaffordable payment plans and unreasonable terms.

Another affordability issue is the additional cost associated with being a mobile-only user. While mobile, pre-paid plans typically cost less than post-paid plans, pre-paid plans often represent much poorer value in terms of price per GB of data. In addition, mobile phone data is more expensive and often less reliable than broadband data, and the cost can lead to some First Nations households having no internet access altogether. As such, people relying on mobile phones for access to the internet can end up paying more for less. This has led some organisations to recommend that the costs of pre-paid mobile data be reduced in remote communities.[44] Related to the affordability of mobile connections is the fact that First Nations peoples in regional and remote areas may have less choice of provider due to coverage limitations. These people may find that Telstra is the only provider covering their area and may have to pay more than people in areas with multiple providers where competition provides a wider range of telco options and prices.

[43] VALS and Consumer Action, 2021. *Consumer Issues in Victorian Aboriginal Communities during 2020.* Available: https://consumeraction.org.au/consumer-issues-in-victorian-aboriginal-communities-during-2020/

[44] CAYLUS, 2021 op cit.

The affordability of community Wi-Fi, available in some communities on an individual access basis via the purchase of vouchers, is another affordability concern.[45] Indeed, there appears to be evidence of price-gouging where communities have been charged approximately $1,000 for accessing 100GB of data. In these cases, pricing calculations are opaque and communities are charged far more than they should be for accessing essential communications services.[46]

> **Recommendation 13:** That the Federal Government consults on and invests in solutions to improve the affordability of satellite broadband services and pay-as-you-go community Wi-Fi.

Furthermore, we are aware that some First Nations peoples using Sky Muster services find that off peak data is of limited value to them. Communities often use far more peak hours of data than off peak, and as such, providers of these services should maximise peak data availability in remote First Nations communities.[47]

Affordability challenges also exist in relation to the cost of devices. Again, efforts in this space have been relatively piecemeal and inconsistent. For example, some states established different device loan programs during COVID-19 lockdowns, while others did not, resulting in inconsistent experiences and access to essential devices for students.[48] In some areas there are also issues associated with device availability, with limited options available for purchase from community stories. This limited choice of device may mean that First Nations peoples are having to buy devices that don't necessarily offer them the best value for money. Furthermore, the costs associated with repairing devices can also be prohibitive, and when devices are broken or not fully functioning this can result in reductions in connectivity.[49] Finally, in relation to devices, while public devices can be critical in helping people get and stay connected, it is not always appropriate for people to use these shared resources or use them in a public setting (for instance, when attempting to have a private conversation or telehealth appointment).

Finally, discussions relating to affordability must also consider the living arrangements of First Nations peoples. In some instances there could be 12 or more people living in one house, trying to access the internet through a sole connection. In addition to the reliability and speed implications of this scenario, this arrangement can become very expensive very quickly.

---

[45] ACCAN 2021a op cit.

[46] ACCAN, 2021a op cit.

[47] As also discussed in CAYLUS, 2021 op cit., p2.

[48] ACCAN, 2021c. *Feedback on ABAC Riding the Digital Wave: Report on COVID-19 Trends and Forward Work Program,* pp4-5. Available: https://accan.org.au/accans-work/submissions/1835-riding-the-digital-wave

[49] First Nations Media Australia, 2021. *Indigenous Digital Leadership Forum 2021 Slides – Shaping Our Digital Futures.* Available: https://firstnationsmedia.org.au/events/indigenous-digital-leadership-forum/indigenous-digital-leadership-forum-2021

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

A number of things could improve affordability for First Nations peoples,[50] including:

- Unmetered access to all key online services (including government, banking, educational and emergency websites), similar to the unmetered access currently provided on Sky Muster Plus services.
- Unmetered access to First Nations media content.
- Free public Wi-Fi.
- Affordable pre-paid mobile options, and better promotion of affordable options such as the targeted Telstra $30 per month pre-paid plan.
- Affordable home broadband offerings.[51]
- Pre-paid home broadband offerings.

These measures to address affordability concerns must ensure that people have access to the same quality of service. Affordability supports must not be inextricably linked to lesser quality, slower or unreasonably capped services.

In addition, robust and comprehensive regulation of the telecommunications sector could help improve affordability for First Nations peoples, and indeed all communications consumers. This could include strengthening existing regulations to improve credit assessment and responsible selling provisions and disincentivise upselling; and could also include the introduction of a requirement on all telecommunications providers to offer affordable services targeted at people on low incomes.

> **Recommendation 14:** That the Federal Government consider new regulatory requirements on telecommunications providers to offer affordable services targeted to people on low incomes as part of a broader review of telecommunications affordability measures.

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

ACCAN recently commissioned some research assessing the effectiveness of programs and offers being provided by the telecommunications industry to assist low income consumers with the affordability of their telco services.[52] This research found that low income offers can contribute to addressing the needs of low income households, however the demand and need for these offers far outweighs their availability. Interestingly, the research indicated that when a telecommunications provider worked closely with a community organisation to deliver a low income product, there was a greater likelihood of the program being considered successful. This finding must be taken into consideration in the relation to affordability measures developed or supported by the IDIP, including

[50] As identified at the Indigenous Digital Leadership Forum 2021 and through ACCAN's research and advocacy.

[51] For more detail see: ACCAN, 2019. *No Australian Left Offline*, available: https://accan.org.au/accans-work/no-australian-left-offline

[52] ACCAN, 2021d. *Addressing Telecommunications Affordability: Evaluating Support for Low Income Consumers,* available: https://accan.org.au/accans-work/research/1924-telco-affordability

acknowledgment of the crucial role community-controlled organisations play in supporting First Nations peoples.

In addition, we are aware that consumer protections offered in other industries, such as energy, can more be effective in addressing the affordability concerns of consumers in financial difficulty. Cross-sector analysis of consumer protections and recognition of telecommunications as an essential service should be considered by the Federal Government.

2.4. Digital ability

As an overarching comment relating to digital ability efforts targeting First Nations peoples, it is essential that digital ability tools and programs are available in plain English and First Nations languages.[53] As with all our comments in previous sections, the IDIP's approach to digital ability programs must be First Nations led and by local communities identifying their needs and solutions. It is important to remember that not everyone will be on the same digital journey – some First Nations people will have more skills than others, some will not want to engage online, and others will only want to engage in certain ways. All preferences and approaches must be respected and considered as part of the IDIP.

2.4.1. 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?

Digital ability and capability are inextricably linked with the availability and affordability of telecommunications services. As such, it is difficult to separate consideration of digital ability from the need for improved access and more affordable goods and services, as outlined above. Indeed, the online confidence of First Nations peoples may be affected by negative interactions with telecommunications customer service arrangements prior to them even getting connected. The risk of this cannot be understated, particularly given the Consumer Policy Research Centre's recent research[54] showing that telecommunications sector customer support performed poorly against other sectors during COVID-19.

A key factor that may be impacting the digital ability or online confidence of First Nations peoples is the extent to which existing programs meet their needs. This includes things like whether these programs provide information in First Nations languages, or in community, as well as whether they take into account diverse learning preferences, or whether they are delivered online or offline. Furthermore, these programs may not be culturally appropriate and may be irrelevant to the lived experiences of First Nations peoples. In some instances, these digital ability programs are short-lived and may not upskill digital champions to continue to support the community after the program has run its course. This means that timely support is often not available when people need it most.

Another factor impacting the digital ability, attitude and confidence of First Nations peoples is the issue of cyber safety and risks associated with online platforms. People are concerned about the impacts that cyber bullying and misinformation are having on cultural and social cohesion within certain First Nations communities. For instance, we are hearing from some communities that the high

[53] First Nations Media Australia 2021, op cit.

[54] Consumer Policy Research Centre (CPRC), 2021. *Consumers and COVID-19: Sector Scorecard*, available: https://cprc.org.au/publications/consumer-insights-series-sector-scorecard/

usage of Facebook and spread of COVID-19 misinformation in particular is impacting vaccine take up and having negative consequences for some First Nations peoples. Culturally appropriate digital literacy programs must be developed to help address these cyber safety and cyber bullying concerns.

2.4.2. What is needed to encourage greater understanding and use of digital technologies?

We believe the following recommendations would support greater understanding and use of digital technologies by First Nations peoples.

Recommendation 15: That the Federal Government fund the upskilling of local First Nations peoples and community-controlled organisations to deliver culturally appropriate digital ability training and information.

Recommendation 16: That governments, industry and educational institutions offer incentives (such as scholarships) for First Nations youth to improve their digital skills and engage in further education relating to digital technologies.

Recommendation 17: That digital ability training be offered on country to ensure the skills and economic benefits that can arise from digital connections can stay in local communities.

Recommendation 18: That networks of First Nations digital inclusion officers or mentors be established across Australia to embed ongoing digital technology support (including peer support).

Recommendation 19: That funding bodies ensure that digital ability programs are long term, and able to provide ongoing support in communities to assist with ongoing learning.

2.4.3. How can digital ability be improved for Indigenous Australians living in urban, regional and remote areas?

Local communities should determine what local needs and aspirations are in relation to digital ability programs. Taking this approach would acknowledge that there is no one size fits all approach to digital ability, and that different people in different areas will have varied experiences and needs. This approach should consider the ways in which people might be tangentially digitally connected – for instance, rather than trying to find someone who is completely disconnected and developing a program to develop their digital ability from scratch, what could instead be achieved by targeting people who have some level of connection but are not digitally confident.

As mentioned earlier, First Nations youth have a major role to play as future leaders and are quite often savvy users of digital technology. Upskilling First Nations kids and young people can in turn lead to the upskilling of older people,[55] and so investment in approaches focused on First Nations youth

[55] Stronger Smarter Institute, 2019 op cit.

will likely have a considerable impact. As such, there should be greater investment in expanding the capacity of the current Australian teaching workforce to support the digital ability of their students, rather than relying on short-term program delivery from outside entities. Teachers must be supported to teach digital ability in a way that is more responsive to the needs of their students, and in particular, provided with the necessary information to take socio-cultural context into account.[56] This would involve, for instance, being flexible and understanding that not all students will have access to their own individual device on which to do schoolwork.

> **Recommendation 20:** That the Australian teaching workforce is supported and adequately resourced to enhance the digital ability of their students.

Upskilling teachers in relation to digital ability will increase the likelihood of sustainable action on digital inclusion. Furthermore, the enabling role of digital inclusion in relation to other Closing the Gap outcomes must also be considered in relation to the general teaching curriculum. Teachers must be supported and encouraged to consider the ways in which enhanced digital ability could lead to further educational benefits.

First Nations peoples' use of social media could also be taken into consideration, in terms of leveraging First Nations peoples with social media profiles or large followings as ambassadors for digital inclusion or digital ability more specifically. Looking at creative ways to leverage strong, existing networks and connections is an important step towards improved digital ability for First Nations communities. This could feed into a broader First Nations digital inclusion campaign. If a campaign were to be run, again, this must be First Nations led and developed in collaboration with those involved with information dissemination – such as cultural and community hubs, RIMOs and other community-controlled organisations.

Finally, funding could be made available for digital inclusion officers or mentors to be embedded in community-controlled organisations or other First Nations groups in communities. Digital ability work that is led by First Nations communities offers an essential opportunity for sustainable program delivery, provided that adequate investment and support is made available to these local community approaches. Furthermore, there would be opportunities to develop and maintain peer support networks between local people in these digital inclusion officer or mentor roles, and the ability to deliver these essential skills on Country.

2.4.4. 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?

inDigiMOB

inDigiMOB allows community organisations, land councils and corporations to partner and deliver digital capability and cyber safety training to people living in remote Indigenous communities. It has

[56] Ibid.

impacted over 3,600 individuals and engaged 24 NT communities in its work.[57] Indeed, inDigiMOB played a key role in supporting First Nations peoples during the COVID-19 pandemic.[58] inDigiMOB is demonstrated to be a highly successful model for program delivery and should be scaled up and funded in perpetuity.[59]

> **Recommendation 21:** That the Federal Government allocate sufficient and ongoing funding to the delivery of digital skills programs for First Nations people, including expansion of the inDigiMOB program.

In particular, the support inDigiMOB offers to community digital mentors, and the capacity building model upon which it operates is crucial, and should be looked to as a best practice approach to digital capacity building.

First Nations media

First Nations media organisations, including RIMOs, play a critical role in spreading information to First Nations communities. For example, during COVID-19 Wilcannia River Radio helped keep people connected and informed, and started Wilcannia Storytime to deliver school lessons over radio, in addition to helping to deliver food and basic services.[60] Other examples of impactful First Nations media and content include TSIMA in the Torres Strait and indigiTUBE.[61] In addition to providing key information and services to community, the availability of First Nations media and content can help get people online, and give them something to actively engage with once they get there.

Deadly Digital Communities

Deadly Digital Communities also plays an important role in developing the digital ability skills of First Nations communities across Queensland. Participants learn a range of digital skills including how to use digital technologies to access different services, such as health or financial services. Consideration should be given to how this program could be scaled up in the future.

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

As discussed above, there are a range of individuals, organisations and agencies that could support and improve digital ability levels, including:

- Community-controlled organisations.

[57] As outlined on the inDigiMob website: https://indigimob.com.au/

[58] Young, Metta, and Smede, Ben, 2021, *Indigenous community perspectives and experiences of digital inclusion*, Australian Communications Consumer Action Network, Sydney. Available: https://accan.org.au/files/Grants/Indigenous%20Community%20Perspectives.pdf

[59] Guenther, John, 2020. *Evaluation of InDigiMOB Year 3 Final Report*, available: https://indigimob.com.au/wp-content/uploads/2020/11/INDIGIMOB_EVALUATION-REPORT_Y3_V1.5_SM.pdf

[60] First Nations Media Australia 2021, op cit.

[61] Ibid.

- First Nations media and content producers.
- Schools and other educational facilities.
- First Nations digital businesses, platforms and internet service providers.[62]
- First Nations social media influencers.

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

A key insight from First Nations Media Australia's *Indigenous community perspectives and experiences of digital inclusion* report was that cyber bullying is a pervasive issue for First Nations peoples.[63] This report, and others,[64] have identified the need for community education and programs to manage the risks associated with online participation, including issues relating to cyber security, cyber bullying and online content unsuitable for children. As outlined above, these community education initiatives must be First Nations led and delivered, culturally appropriate, and must not assume everyone has the same baseline knowledge or process of engaging online. They must also be relevant to individual experiences, as well as the community context (for instance, having customisable controls for community Wi-Fi connections so local communities can determine what access they want to permit).

More broadly, better protections and redress in relation to scams are important.[65]

2.5. Data

As identified in the discussion paper,[66] there are limitations to using Australian Digital Inclusion Index (ADII) data in relation to the digital inclusion rates of First Nations peoples. We urge the NIAA to use the IDIP to identify and fund more reliable sources of data on the digital inclusion rates of First Nations peoples. This is particularly important given the short timeframe against which Target 17 of the Closing the Gap Agreement is to be met. Given this timing, we are concerned that the limitations in current data on digital inclusion and connectivity in First Nations communities will lead to significant challenges when attempting to measure progress and success against this Target.[67] There is an urgent need to identify an appropriate and comprehensive baseline against which progress on this Target can be assessed.[68]

Furthermore, Target 17 is highly relevant not only to online access, but also in relation to data sovereignty. First Nations people must have the right to collect, own and use information about themselves. Our following comments and suggestions are informed by this position, that all data relating to First Nations communities must be collected, owned and used by First Nations peoples and communities. This would support culturally appropriate, and possibly more comprehensive data

---

[62] Ibid.

[63] Young and Smede 2021, op cit.

[64] The Australian Literacy and Numeracy Foundation and World Vision Australia 2021, op cit., p13.

[65] Brody, Gerard, 2021. *Scam losses are increasing dramatically – what should be done?* Consumer Action Law Centre, available: https://consumeraction.org.au/scam-losses-are-increasing-dramatically-what-should-be-done/

[66] NIAA IDIP discussion paper (p4).

[67] ACCAN 2021a, op cit.

[68] First Nations Media Australia 2021, op cit.

collection, as it would likely be achieved through locally relevant and culturally safe mechanisms. Adequate funding must be provided to support this First Nations data collection and analysis.

> **Recommendation 22:** That the Federal Government, as a priority, funds First Nations data collection and analysis to support data sovereignty as outlined in Target 17 of the Closing the Gap Agreement.

Data about infrastructure and services that are available in different parts of Australia is essential to collect and analyse in relation to First Nations digital inclusion. This should include, for instance, data on last mile connectivity such as the availability of shared/public devices and free Wi-Fi in communities, data about people buying credit or phones through outback stores, analysis of coverage maps (including where 3G, 4G, ADSL and satellite services are available) and information about outages (including power outages) in different areas. This would not only help build an understanding of what is available in communities nationwide, but also of the quality and reliability of existing services.

Some metrics that could be useful when measuring First Nations digital inclusion includes the proportion of First Nations peoples:

- regularly using the internet (including households with internet connections)
- regularly using public phones or other public forms of connectivity
- using home broadband compared to other forms of internet
- using telehealth or other online health services
- using online services, including government services
- employed in tech-related or digital content creator roles
- employed in digital inclusion/digital mentor roles in community-controlled organisations.

This data must be disaggregated by State/Territory, remoteness, and technology type. There must also be greater transparency about the data held by telecommunications providers about the availability and use of their services.

Other forms of data that must be captured include the average amount of money First Nations peoples or communities spend on connectivity relative to income. This should be disaggregated by connection type and include analysis of the inclusions/exclusions in relation to the cost of the service. The number of people in the household should also be considered in relation to this data – as should the number of devices present in the household, both of which would likely impact the quality of digital access available.

In relation to digital ability, data should be captured on how often schools are providing digital ability opportunities to their students. Data should also be captured about how people are using their connections – or if they are not connected or not using their connections regularly, why this is the case. In addition, data about attitudes towards connectivity and digital inclusion could be useful to track, to understand what people think about their connections or being active online, and what they find easy or difficult about getting or staying connected. A more standardised digital ability skills framework, such as that advocated by the ADIA, could support the collection of more useful data regarding digital ability.

Finally, as mentioned earlier, given the interrelationships between different Closing the Gap Outcomes, data captured under related Outcomes should be considered for utility in relation to digital inclusion.