COMMUNICATIONS
ALLIANCE LTD

DSS Consultation on a Financial Counselling Industry Funding Model

COMMUNICATIONS ALLIANCE SUBMISSION

December 2022

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INTRODUCTION

Communications Alliance welcomes the opportunity to provide this submission in response to the Department of Social Services (DSS) Financial Counselling Industry Funding Model ('the model') Discussion Paper.

About Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see http://www.commsalliance.com.au.

Summary

The telecommunications sector acknowledges the valuable role that financial counsellors play in supporting consumers in financial stress and notes the overarching recommendation of the Sylvan Review – supported by Government – that nationally-coordinated, equitable and sustainable measures be introduced to ensure the long-term viability of the financial counselling sector.

We fully support this overarching recommendation.

Unfortunately, however, we do not believe that the funding model outlined in the DSS discussion paper ('discussion paper') meets these objectives and, therefore, cannot support it in its current form.

We remain firmly of the view that a long-term industry scheme can only succeed if it is demonstrably inclusive and equitable, in terms of sectoral contributions and in-sector contributions, inclusive of all relevant sectors and mandatory in nature.

Given the complexity and administrative costs associated with attempting to address these issues, we suggest that the only logical solution is to provide the additional funding through consolidated revenue. Although not perfect, as it does not exclusively target drivers of debt, this approach would clearly ensure a stable, wide funding base. It also would prevent the risk of investing further resources in a scheme that, we believe, will not deliver a successful outcome.

Further detail on our position is included below as part of our response to the questions raised in the discussion paper.

Responses to the discussion questions

Discussion question 1: What are your views on the proposed principles for developing the industry funding model?

Communication Alliance's views on the proposed 6 principles for developing the industry funding model, as outlined in the paper, are presented below.

Principle 1. Industry funding helps to address unmet demand and improves the predictability and stability of funding for financial counselling services.

It is not clear how useful this principle is, as currently framed; it is not *industry* funding per se that would assist meet unmet demand – *any* additional funding would help achieve this. Moreover, predictability and stability of funding *out* depends on the stability of funding *in* – a concept that is missing from this principle (and the *voluntary* model) currently.

We suggest that it would be more useful to reframe this principle along the lines of: *Increasing the funding for financial counselling services in a sustainable, ongoing manner would enable FC services to better meet demand now and into the future.*

Principle 2. Industries that contribute to the demand for, and benefit from, financial counselling, contribute to the funding of the services.

This principle seems broadly reasonable, but we suggest that the term 'sector' may be more appropriate than 'industry' in this context, as 'industry' is perhaps a little narrow and may not immediately be understood to include the housing or retail sectors, which we understand from earlier DSS discussions to be in scope for consideration (even if excluded from this model due to threshold participation limits that are based on a flawed survey).

In applying this principle, we note that:

a) many sectors 'contribute' to financial pressure: housing, retail (particularly alcohol), gambling, banking, utilities, etc. Note that this list includes 'essential' spending (housing, utilities) and discretionary items which may, when money is tight, divert household funds away from essentials (alcohol, gambling, etc)

b) a very wide range of industries benefit from financial counselling services: having solvent consumers is good for the economy and society as a whole.

Principle 3. Quantum and split of suggested industry contributions are determined on a fair and transparent basis.

This principle is sound (noting the previous comment about 'sector' replacing 'industry') Unfortunately, it has not been applied in the proposed model. (Further comments are included later in this submission.)

Principle 4. Industry funding provides an additional funding stream to current funding sources.

If by this the DSS means that current funding sources must – at a minimum – be maintained in relative terms to ensure that the 'non-industry' contribution as a percentage of the total does not diminish, then we agree.

Principle 5. The operation and effectiveness of the model is supported by robust data and evidence collection and analysis

We agree with the principle that the model must be supported by robust data and evidence collection and analysis but would add the concept of 'independence' to ensure the data has been obtained through rigorous and professional standards and analysis.

Principle 6. The model contributes to improved coordination, innovation and capability building and enhanced service delivery across the financial counselling sector.

It is not entirely clear what this means and whether consumers will be better off as a result of the model. Improved coordination between whom? Financial counsellors? Financial counsellors and the experts within the sectors who are empowered to assist their customers with financial hardship associated with their product or service?

We support the aim of ensuring appropriate coordination and suggest it should encompass all of the above.

We note that it may be efficient and effective to address some issues outside of the model. For example, we understand that Financial Counselling Australia (FCA) has a toolkit available to its members. We do not have visibility of this but presume that it includes information to help financial counsellors advise clients about different hardship options that may be available to them through different providers (banks, utilities, etc). It may be efficient and helpful to all parties if consumers can be efficiently directed to the relevant providers, armed with appropriate, up-to-date information and support.

Communications Alliance will approach FCA directly to understand if it can assist identify current barriers and information gaps that financial counsellors may have when assisting clients with telecommunications-related financial stress. Further comments on this are included against discussion question 3.

Discussion question 2: What are your views on the proposed quantum for each year of the first three years of the model?

Communications Alliance appreciates the work done to estimate the funding gap and accepts that the estimate of funds required to plug the funding gap appears reasonable. Given the size of the funding gap that industry is expected to plug, however, we contend that, to be viable, funding must be obtained from the widest possible range of contributors, which also implies that it must be mandatory. This issue is examined further in response to question 3.

Further, we are sceptical that a scheme could be ramped up quickly enough to spend all of the proposed funds in the first two to three years; it is unrealistic to expect that a new body not yet established could recruit, train, plan and effectively and efficiently spend almost $20 million each year for three years. This view is informed both by general experience in setting up new programs, and more specific recent experience looking at both the interim and long-term scheme financial counselling funding options[1].

We therefore suggest that serious consideration be given to starting any scheme up more gradually, with funding increasing gradually over time as capacity grows.

[1] Interim funding options have included exploring a one-off joint industries donation to the Financial Counselling Foundation as a 'good will' interim funding gap measure in lieu of setting up an 'interim body' to distribute funds and collect data, as originally proposed, given the inability to establish such a body in a timely and efficient manner.

Discussion question 3: Are there any evidence-based adjustments that could be made to the suggested contributions methodology? What are they and how could they be incorporated into the methodology?

The proposed scheme requires fundamental structural changes and more than just adjustments to the contributions methodology to make it likely to succeed.

As noted in our opening statement and response to discussion question 1, we believe that to be successful, any model must be:

(a) inclusive of all relevant sectors;

(b) demonstrably equitable in terms of sectoral contributions and in-sector contributions; and

(c) mandatory in nature.

The proposed model is none of these.

Inclusive of all relevant sectors and demonstrably equitable in terms of sectoral contributions and in-sector contributions

The proposed scheme does not include all relevant sectors, meaning that the funding base is far too narrow, and individual sector contributions are too high. It is particularly problematic that the gambling sector is missing, despite the Sylvan review (and numerous studies and reports since) clearly recognising the harm caused by gambling and the role of the sector in driving many consumers to use financial services. The gambling sector's exclusion despite it having shown a willingness to contribute, is particularly baffling.

The discussion paper states that "The survey was not designed to measure the underlying reasons for why clients have sought financial counselling, nor the impact of various sectors, subsectors and firms on the level of financial distress experienced by clients."

Despite noting that *"the Sylvan Review noted problem gambling can drive demand for financial counselling services, but debts to a gambling organisation is not the debt an individual seeks assistance with when receiving help from a financial counsellor"*, the discussion paper then states that: *"Identifying underlying causes or apportioning the level of financial distress generated by different sectors and subsectors would be complex and is unlikely to translate into a method to apportion funding among sectors and subsectors. The 2021 survey results provide an empirical starting point for determining suggested contributions and could be revisited by the independent body at a later stage."*

We support the position made by Sylvan and strongly disagree with the premise that the gambling sector be largely ignored because 'it's too hard' to accurately measure their contribution. We do not agree with the implied suggestion in the paper that the Advisory Group is comfortable with this approach. There is clear evidence that gambling causes financial hardship. There is an equally clear reason why the harm caused would not be shown in a survey about 'why clients have sought financial counselling' – as explored below. We cannot support a scheme that bases sectoral funding calculations on such a survey.

Basing a scheme on a survey that does not even attempt to consider the root cause of the problem is inequitable, will not drive the required behaviour change and is poor policy. The proposed solution should address the underlying causes or problems of why consumers seek financial counselling assistance.

We consider the gambling sector's exclusion to be a 'showstopper' and will not participate in the scheme without the inclusion of the gambling sector.

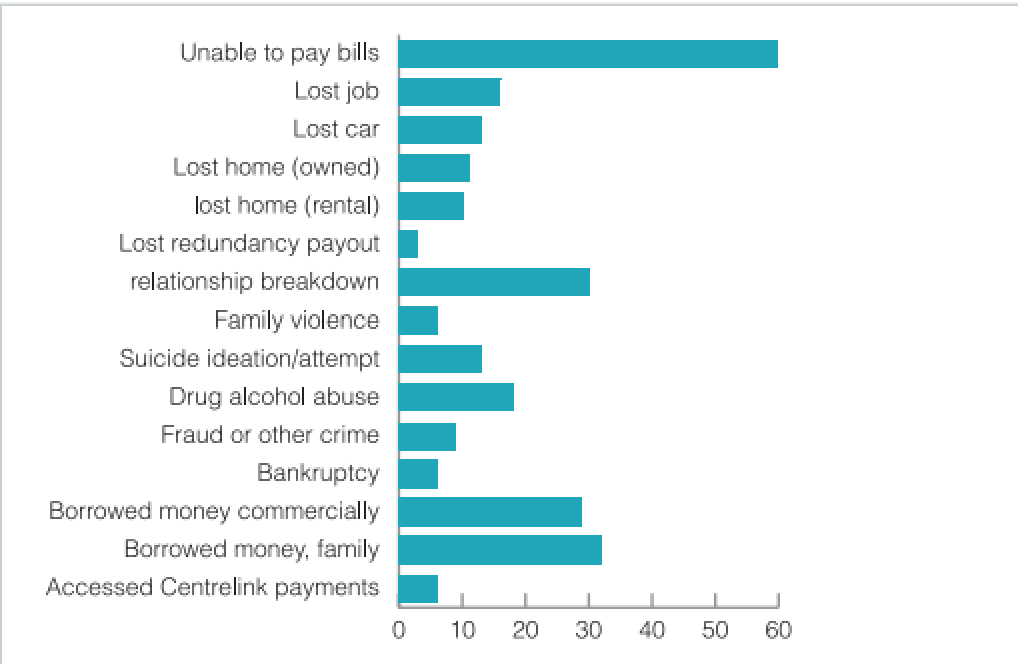
Evidence of gambling's harm is presented below, along with other commentary about the proposed funding model. Proposed adjustments the scheme's methodology follow.

Financial Counselling Australia Research

A 2016 and 2022 survey and report by Financial Counselling Australia (FCA) both provide clear evidence that the premise that one survey of general financial counsellors about the use of financial counsellor's time is a reasonable basis for devising a model to fund financial counselling, is totally flawed.

The 2016 research - https://www.financialcounsellingaustralia.org.au/fca-content/uploads/2019/10/Problem-Gambling-Financial-Counselling-Survey-and-Case-Studies.pdf - found that most gamblers could not pay their bills:

Impact of problem gambling



The second report, [The explosion of gambling harm and the need for urgent training for financial counsellors - Financial Counselling Australia](), adds to this evidence. It also makes it clear that not all financial counsellors accept clients with gambling problems, again demonstrating that a survey of general financial counsellors is clearly not going to provide an accurate measure of the harm gambling causes.

More telling is that according to the 2022 research, the vast majority – 76 percent – of **generalist** financial counsellors had seen clients impacted by gambling. According to the research, this gambling led to substantial, quantified harm, leading to:

- 57% those contacting the generalist financial counselling service not being able to pay rent or mortgage,
- 50% not being able to pay credit card bills, and
- 40% incurring debts with personal loans.

The damage caused by gambling is even more evident when one understands that there are also **specialist gambling** financial counsellors.

According to the report, specialist gambling financial counsellors make up about one-third of all financial counselling services. And among their clients they saw:

- 88% unable to pay essential services
- 91% unable to pay rent
- 92% relying on loans from friends and family.

The survey also notes that the work that financial counsellors have to do with gambling-affected clients is more complex than that conducted with non-gambling affected clients – meaning that it is more time-consuming, requires more training and is therefore more costly to provide. This point is also supported by comments from the Financial Counselling Foundation that gambling is a major source of stress for financial counsellors, with the financial counsellors requiring more training and support when assisting clients with gambling debt. (Additional training and support is also required when dealing with clients affected by domestic and family violence.)

This again emphasises that any scheme that does not recognise the harm caused by this sector and which does not equitably include it in the solution, is fundamentally flawed.

Australian Institute of Health and Welfare (AIHW) research

Research by the AIHW adds further to the body of evidence about gambling's harm and knock-on impacts. The report (https://www.aihw.gov.au/reports/australias-welfare/gambling) states that:

"Gambling is a major public policy issue in Australia, affecting the health and wellbeing of individuals and families in a range of ways. Estimates suggest that Australians lost approximately $25 billion on legal forms of gambling in 2018–19, representing the largest per capita losses in the world (Letts 2018; QGSO 2021)."

"The social costs of gambling – including adverse financial impacts, emotional and psychological costs, relationship and family impacts, and productivity loss and work impacts – have been estimated at around $7 billion in Victoria alone (Browne et al. 2017). Gambling-related harms affect not only the people directly involved, but also their families, peers and the wider community (Goodwin et al. 2017)."

"Estimates suggest that around 35% of Australian adults aged 18 and over (or 6.5 million people) spent money in a 'typical month' (defined as 'regular gambling') on one or more gambling activities ... ."

"Browne and colleagues (2016) developed a conceptual framework for gambling-related harm that comprises 7 main domains: financial, relationships, emotional/psychological, decrements to health, reduced performance at work/study, and cultural harm and criminal activities (combined below as 'other harms')."

The study further estimates that nearly 16% of gambling harm is direct financial harm, with additional negative impacts – including financial – to up to 6 other people close to the gambler.

Notably, the report states that only, "*…a very small proportion of people seek help for problems related to gambling. For example, the most recent NSW gambling survey found that less than one percent (0.9%) of people who gamble had sought help for problems related to their gambling in the past 12 months, in the Northern Territory the estimate was 1.5%, and in the ACT 2% (see, for example, Browne et al. 2019; Menzies School of Health Research 2019).*"

Again, this all points to the fundamental flaw in the methodology used by DSS to apportion financial counselling funding.

Victorian study
Further empirical evidence of gambling's harm is provided from a Victorian study, Gambling Statistics Australia November 2022: Do we have a gambling problem? (finder.com.au). Key points from this research are presented below.

- *"In Victoria, more than two-thirds of adults (69 percent) participated in some form of gambling last year, according to the Victorian population gambling and health study 2018–2019. While most people who gamble do so without negative consequences, a significant minority do experience harm arising from their gambling."*

- *"Never before has gambling been so accessible or heavily promoted, especially with the advent of online and sports betting. Indeed, many young people believe it's normal to bet on sport."*

- *"People don't have to be 'addicted' to experience gambling harm. Indeed, the majority of gambling harm in Victoria is experienced by people who do not fall into the 'problem gambling' category."*

- *"In the only study of its kind in Australia, the social cost of all gambling in Victoria in 2014–15 was estimated at $7 billion. The highest cost related to family and relationship problems ($2.2 billion), followed by emotional and psychological issues ($1.6 billion) and then financial losses ($1.3 billion)."*

Note that these estimates are just for Victoria!

- *"It is a concern to the Foundation that gambling is heavily promoted across a range of media without addressing the risks. For example, research published in 2019 found*

> *there was an average of 374 gambling ads a day on Australian free-to-air TV in 2016. This was approximately five-times the number of alcohol ads."*

Other research and activities of note

Communications Alliance notes that online gambling is growing faster than other forms of gambling (see https://www.abc.net.au/news/2022-12-11/online-gambling-addicts-speak-out/101735850), and notes the current Australian Government inquiry into online gambling: https://www.aph.gov.au/onlinegambling.

Submissions to the inquiry, including Sub 76 - Australian Gambling Research Centre, Australian Institute of Family Studies.pdf add to the weight of evidence that gambling harms include financial harm that leads to reduced capacity to pay for essentials.

We also note that the terms of refence include examining the effectiveness of existing consumer protections aimed at reducing online gambling and the effectiveness of current counselling and support services to address online gambling.

We are not clear how this work is being considered within the context of the DSS scheme. However, we are supportive of the work being done to investigate this area of gambling and will continue[2] to work constructively with Government to block websites deemed to be illegal.

Contribution mechanisms – voluntary vs mandatory

In order to ensure stability and equity, the scheme must, in our view, be mandatory for all sectors that affect household spending (and must include the gambling sector). Contribution from relevant individual entities within a sector should also be mandatory, based on a revenue limit. Entities below a certain revenue threshold could choose to take part on a voluntary basis. This position is consistent with the Sylvan view recommendations.

On an individual company basis, decisions on which projects receive discretionary spending are likely to be taken at individual line level, drawing from individual line area budgets. In addition to the fact that there is considerable 'competition' for such spending, with many worthy causes already committed to, individual budgets would likely not be sufficient to cover the type of money 'required' under the proposed model (up to around $920,000, potentially[3]). This makes it difficult for individual companies to voluntarily contribute to the scheme at the envisaged rate, and therefore very unlikely that the sector will meet the target contribution total, even where there is a willingness. It could also mean 'robbing Peter to pay Paul', with money from one worthy cause being transferred to another. Unless the scheme is truly voluntary, with funding graciously accepted at sustainable (for individual

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[2] Note, for example, that major providers have already agreed to a protocol with the ACMA to block illegal offshore gambling sites. See Blocked gambling websites | ACMA.
[3] Splits within sectors have not been suggested. However, DSS states that it would be seeking to target only the largest 3-4 businesses from each sub-sector, with splits potentially based on business size.

budgets), reasonable and justifiable levels (vis-à-vis other worthy, discretionary projects, and reflective of the individual company's contribution to the problem), we do not believe it will be successful. The funding base (number of sectors included) of the scheme would need to be substantially increased for this to be viable in terms of meeting the funding targets (although, as noted in our response to an earlier point, we believe the yearly budget could be reduced while the scheme is ramped up).

In addition, it is difficult to understand how a voluntary model would reasonably accommodate organisations joining or leaving the scheme, paying less than the 'expected' amount, or decreasing their contribution from one year to the next. Would other contributors be expected to make up the shortfall? What is the incentive for DSS or the independent body to attempt to expand the funding base to include other sectors? If the Government is only prepared to contribute to the funding when a threshold of 70 percent of the target is met (as proposed), is it fair to assume that others may take the same stance and it is 'back to the drawing board'?

Finally on this point, we note the paper's suggestion that 'anyone is welcome to contribute', it would appear that any funding raised would top up the total scheme funding rather than reduce the liability for each sector. As it seems unlikely that any substantial funding would be raised from sectors not specifically targeted, this point is probably moot, but it adds to our concern that participating in any voluntary scheme would effectively penalise – not reward – any organisation who chose to participate.

Other fundamental problems with the model

Other fundamental problems with the model as proposed include that:

- It provides **no recognition of the wider landscape** in which each sector operates and other social and financial contributions each makes. Many of our members already spend considerable amounts of money – up to $6m annually in one case – on measures and programs to assist customers in financial hardship. Additionally, the sector as a whole also has universal service obligations, and there are numerous causes and social good initiatives – including through the Telco Together Foundation (TTF) – that members put significant resources into.

  Additionally, the telecommunication's industry operates with far smaller profit margins than many other industries: for example, *the profit of our entire sector is a quarter of that of the smallest of the big four banks*[4].

- It **fails to incentivise any improvement in process or practice** that would reduce the likelihood of a relevant sector's customers' need to consult with financial counsellors. Good policy needs to recognise drivers for debt and reward actions to reduce it.

- There is little **transparency or clarity** about how this funding fits within the bigger picture. How state and territory Governments will be involved, for example? (It is far from clear that there is commitment to maintain funding at current levels as per Sylvan recommendation 2A.)

[4] Andrew Sheridan, as reported in Comms Day, 16 March 2022

Returning to the specific question in-hand: **Are there any evidence-based adjustments that could be made to the suggested contributions methodology?** We suggest that the evidence strongly supports the need to make the adjustments as follows:

1. The contribution base must be substantially widened to include sectors contributing to the root cause of financial hardship, including, but not limited to gambling, alcohol, tobacco and related products, and general retail.

2. The scheme must recognise sector/individual company's responsibility for creating financial hardship and reward their success in directly addressing causes within their area of control.

We appreciate that this will require substantial work, so suggest that the fastest, most efficient and fail-safe path to provide stable funding for financial counsellors is to provide funding on-budget from consolidated revenue. This will also ensure ongoing transparency of such additional funding as a public rather than private policy response.

Should the Government determine that it wants to continue with some form of the current model, the contributions model must be adjusted to properly account for underlying causes of harm. With FCA research pointing to flow on impacts for between 40 and 91 percent of those contact financial counsellors, and financial losses due to gambling attributed to $1.3 billion for Victoria alone, we suggest that a contribution by the gambling industry of at least 50 percent of the total funding sought would not be unreasonable.

We further suggest that consideration be given for including alcohol and smoking products (tobacco, vaping) and retail in the remaining 50 percent. This would distribute the funding more equitably and more sustainably, with smaller contributions per sector.

Additionally, we suggest that any program should be accompanied by targeted in-kind work to understand and address identified problems for each sector.

For example, in our sector, we could look at coordinating in-kind work directly with FCA to address the barriers and roadblocks they or their clients face looking at financial hardship relating to their telco service. There is an existing obligation under the Telecommuncations Consumer Protections Code for providers to assist customers facing financial hardship. If consumers ask FC for help with telco-related issues, financial counsellors should be referring consumers back to the telco to agree on appropriate FH measures. The telco industry is prepared to work with the FCA or state bodies to understand and implement improvements to help make this work better. Initiatives could include things like: 'what to expect' tip sheets; up-to-date contact lists of key contacts at each telco for easy reference by FCA; and escalation contact points.

Significantly, industry has, through Communications Alliance, already started work to streamline processes to address a recently identified barrier that has arisen as a result of new multi-factor authentication legislation. We will be consulting with the FCA about new guidance in the new year.

Discussion question 4: Should any businesses within a subsector be excluded (e.g. small businesses)?

We suggest that it is not necessary or meaningful to 'exclude' any business from participating in a *voluntary* scheme. If it is not mandatory to be 'included', why would anyone need to be 'excluded'?

What are your views on option 1 (peak body representatives work with their subsector to determine an appropriate methodology to apportion within subsector contributions, and advise the Department of the approach) **and 2** (subsectors and their peak body representatives work with the Department to determine an appropriate methodology to apportion within subsector contributions) **for determining the split within subsectors for voluntary contributions?**

What is your view on the different methods for within subsector splits, for your subsector?

We do not yet have a position on methods for the split within our subsector, other than that it would need to be equitable and mandatory (for our and other sectors) to be successful, with a potential carve-out for entities below a certain revenue threshold, which might be invited to participate on a voluntary basis.

In terms of methods for working out an appropriate methodology, Communications Alliance prefers option 1, as we do not think that DSS are in a position to realistically add value to the process. If we were to seek Government assistance, we would more likely seek help from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, as they have knowledge of the industry and access to comparative data that could assist with the task.

Discussion question 5: What is your view on the proposed initial three-year commitment? Is this an appropriate length to ensure flexibility and stability of funding?

Three years would be reasonable for a scheme that was established on an equitable, mandatory and evidence-informed basis, or for a scheme with a much wider funding base, where individual company fluctuations in funding contribution would have a much smaller impact on overall funding.

However, as already noted, we do not believe the model as currently proposed is capable of ensuring the stability of funding required.

When would an appropriate time be to review the functioning of the model?

The paper suggests a scheme review at 2 years. In most circumstances, we would consider this reasonable.

However, we note that the initially proposed 'interim' funding model that was supposed to provide data to inform the longer-term arrangements and help set expectations, has not yet been established. It might, therefore, be more realistic to flag ongoing expectations, but review the scheme after one year.

In relation to the review itself: Any review must be truly independent (from each sector and Government), be funded by Government and must fundamentally review the demand modelling methodology and conduct new (not simply updated) demand modelling to determine the new quantum of unmet demand. It must also not just seek recommitment from current funders, as suggested, but also actively seek new contributors – though we note that seeking new contributors must be an ongoing activity.

Are peak organisations an appropriate mechanism to obtain a formal commitment from subsectors as part of the initial set up of the model? Are there alternative methods to secure commitments that could be undertaken in a timely manner?

Industry associations are unable to be responsible for their members' participation or financial contributions. And if organisations that are members of industry associations are the only ones targeted to participate, this could be a fairly compelling reason for companies to quit, or not join, industry associations.

There is no obvious alternative method to secure commitments in a timely manner except to draw money from consolidated revenue.

We note that the paper states that: *"The Department will look at ways to engage businesses and encourage contributions who are not members of peak organisations."* However, this is apparently contradicted by the statement that the Department would, *"seek formal commitments from only the largest businesses within each subsector (maximum 3-4 per subsector), to ensure certainty in industry contributions under the model."* This could completely de-incentivise participation in a voluntary scheme.

We also do not understand the suggestion that "*The body could advise peak bodies how their subsector is tracking with their contributions.*" With a view to what?

Discussion question 6: What are your views on the proposed characteristics of the independent body as set out in Table 4? Are there other characteristics that should be considered?

We support the suggestion that *"To encourage contribution to the industry funding model and provide recognition of contribution, the body may choose to acknowledge and publish the names of organisations contributing funding (with permission)."* There are some practical questions about how this might work, however. Given the model 'suggests' how much each sector, and then individual organisations within each sector 'should' contribute, would the body choose to acknowledge all contributors, or only those it deems are paying their 'fair share'? Arguably, if a contributing organisation is at risk of receiving bad publicity, it would logically choose to not participate at all and divert its donations to more 'rewarding' causes.

We note the statement that the body will *"have the capability to engage with other funders of financial counselling (for example, the Australian Government, state and territories' contributions) on coordination and innovation of funding and services."* We welcome this, but strongly suggest that the Governments' contributions should be reviewed and transparently accounted for.

Discussion question 6: What are your views on the proposed questions the evaluation could test?

We do not have any particular comment on the evaluation questions.

Discussion question 7: Which board composition option do you prefer and why? Are there other options?

Communications Alliance prefers the second of the two options presented for the Board composition: independent chair, fixed-term appointments with equal representation between members with specific skills and knowledge of the community sector and industry representatives on the board. This is a structure utilised by external dispute resolution schemes, like the Australian Financial Complaints Authority.

Our preference is based on the fact that this is a tried and tested methodology.

An alternative model could be a structure similar to the Office of the Telecommunications Industry Ombudsman.

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