

5 May, 2023

Comments on
Productivity Commission
Review of Philanthropy
Future Foundations for Giving
draft report

Submission by Croakey Health Media
to the Productivity Commission

Contact details

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1. Comments

As noted in our submission to the review in May 2023, Croakey Health Media warmly welcomes the Australian Government's commitment to doubling philanthropic giving by 2030. This is an important opportunity for addressing many public health concerns, including the crisis in public interest journalism, and the unsafe and often toxic news and information ecosystem experienced by Australians. It also would help to address health inequities by increasing investment in the social and cultural determinants of health and wellbeing. There is also potential for health gains to flow from the increased social cohesion and civic participation that could be expected as an outcome of increased philanthropic giving.

We also acknowledge the Productivity Commission's recognition of the importance of consulting with Aboriginal and Torres Strait people in this work, and the acknowledgement of the strong cultural traditions of reciprocity, helping and supporting communities and informal volunteering in Aboriginal and Torres Strait Islander communities.

We acknowledge that many of the recommendations in the draft report are significant for public health and wellbeing. However, in this submission we focus narrowly on those recommendations relating to public interest journalism. We declare our interest in this discussion; as a not for profit organisation providing public interest journalism services focused on health equity and under-served communities and health issues, we have been unable to obtain DGR status. This has undermined our capacity to remain sustainable; indeed since lodging our submission to this review last May, our financial situation has become increasingly perilous. Obtaining DGR status would make a real difference to our capacity to continue our operations, through increasing our access to donations and grants. It would also add to the legitimacy of our organisation and appeal to funders; as the review notes, some people regard charities with DGR status as more reputable.

We have two main comments upon the draft report:

1. We warmly support the recommendation to expand DGR status scope to include public interest journalism, but strongly recommend that this should be as a defined charity subtype, rather than in an "other" category. As we argued in our previous submission, growing and developing the not for profit public interest journalism sector could help address many of the gaps and inadequacies in the provision of public interest journalism in Australia. It also will support the development of new models that are more responsive to community needs, including through governance that is more accountable to communities. Making public interest journalism a standalone DGR category would send a very important signal of support for the growth of this sector, and would also align with Government policies aimed at supporting a more diverse media landscape. It would also send a strong signal to the philanthropic sector and wider community about the significance of not for profit journalism.
2. In developing criteria for eligibility for public interest journalism organisations to qualify for DGR status, it will be important to consult widely and not only with media industry representatives, but also with journalism practitioners and researchers, independent media organisations, communities under-served by the current media landscape and public interest advocates.

We note that in our 2023-2024 Pre-Budget Submission (January, 2023), Croakey Health Media requested that the Government commit appropriate resources to develop a policy

framework specifically to support and grow the NFP public interest journalism sector, with a particular focus on meeting the needs of under-served communities and topics.

The framework could include:

- A clear, transparent, equitable pathway for appropriate entities to set up as a NFP public interest journalism organisation with DGR status, meeting criteria for editorial independence and ethical professional practice. It would be important to have a rigorous review process to ensure that applicants are not serving commercial, partisan or other sectional interests.
- Support for a peak body to represent and support growth and sustainability of this under-developed sector, including support for the many small outlets that now exist that might opt for NFP structure if it was more accessible and affordable. Initially, this could be done through an existing entity, such as the Local and Independent News Association (LINA).
- Government to identify a percentage of funds from Government advertising and other campaigns to be allocated to NFP public interest journalism organisations. It is suggested that the percentage of funds allocated commence at 0.5% and rise to 2% over the budget forward estimates.
- Initiatives to encourage philanthropists and other potential funders to consider supporting NFP public interest journalism models, and to encourage public awareness of the benefits of NFP models.
- The Government's planned framework on media diversity should include data on the NFP sector, with diversity of business models being considered as one of the measures of diversity.
- The NFP sector should be eligible for all support programs for journalism and media organisations, with a specific funding pool established for the NFP sector.

Finally, we reiterate the points in our previous submission that a stronger and more sustainable not-for-profit public interest journalism sector would help to strengthen Australian democracy at a time when democracies globally face significant challenges and at a time of [escalating crises](#), including climate disruption, diminishing social cohesion, and the proliferation of misinformation and disinformation. Equitable access to reliable news and the accountability roles of public interest journalism will become ever-more important.

We would be delighted for the opportunity to contribute to any further discussions or consultations to assist the work of the Review.

2. About Croakey Health Media

Croakey Health Media is widely recognised as an innovator and leader in the emerging not-for-profit public interest journalism sector in Australia ([Public Interest Journalism Initiative, 2021](#)). We are innovative in our organisational structure, blended funding model and development of the practice of social journalism ([Sweet et al, 2017](#)). We focus on health equity, and the social, cultural and environmental determinants of health, including climate change. The voices and expertise of Aboriginal and Torres Strait Islander people are foregrounded through our work, including through [our governance](#). Our board is chaired by leading Aboriginal scholars, Professor Bronwyn Fredericks (University of Queensland), and James Blackwell (ANU). Croakey Health Media Limited was registered on 24 August 2018 as a member-based company limited by guarantee, after evolving since 2007 as an independent journalism project. The ABN is 59 628 369 335 and the company is registered for GST.

Due to the lack of a clear pathway for public interest journalism organisations to establish as not-for-profit entities, Croakey Health Media is registered with the Australian Charities and Not-for-profits Commission (ACNC) as a charity under the subtypes of Advancing Health and Advancing Public Debate. We have not been able to obtain DGR status, reflecting the lack of a transparent, equitable pathway for NFP public interest journalism organisations to do this. We have made a number of unsuccessful applications for DGR status, and have recently lodged another application. Not having DGR status has been an obstacle to our capacity to raise funds and to our efforts to become more sustainable.

Croakey Health Media's public interest journalism activities are supported by a blended funding model, including sponsorship, donations, subscriptions, the provision of professional services, advertising, and paid journalism activities, including the Croakey Conference News Service. Our funders and supporters include leading health organisations. We have firm policies on editorial independence and these are communicated to funders.

As an organisation, one of our five strategic priorities is to create a sustainable environment for public interest journalism, acknowledging the vision outlined in [our strategic plan](#), that "a vigorous and sustainable public interest journalism sector contributes to the health and wellbeing of people, families, communities, policies, societies and the environment".

We advocate for policy reform to support a sustainable public interest journalism sector, through making [submissions](#), and through [journal and book publications](#), research, and presentations to conferences. We are also proactive in engaging with other public interest journalism publishers and organisations to help build momentum for better policy to support public interest journalism. Croakey Health Media is a member of the Local and Independent News Association (LINA). Our members belong to various professional organisations, including the Media, Entertainment and Arts Alliance.

We work to increase public awareness of the challenges facing public interest journalism and its important role for the health of communities, policies and democracy. Journalistically, we cover public interest journalism as a critical determinant of health. See our [archives on public interest journalism as a determinant of health](#).

See Croakey Health Media's [previous submissions](#) to inquiries on media policy and related (2017-2023).

