

21 February 2018

**.au Domain Administration LTD (auDA)
Policy Review Panel
c/o .au Domain Administration Ltd
PO Box 18315
MELBOURNE VIC 3001**

Via email: policy.review@auda.org.au

Registrant Policy: Enabling Australia's Digital Economy and Society

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from cultural and linguistically diverse backgrounds are given proper recognition in public policy.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion, and are formulated with the common good of all Australians in mind.

FECCA welcomes the invitation from .au Domain Administration Ltd (auDA) to make a submission responding to Registrant Policy: Enabling Australia's Digital Economy and Society. We would welcome the opportunity to provide further comment and encourage you to contact the Senior Policy and Project Officer, Dr Alia Imtoul at alia@fecca.org.au and the Director, Dr Emma Campbell at emma@fecca.org.au or on 02 6282 5755.

Recommendations

FECCA recommends that auDA, in relation to the reform of Australia's Domain Name System (DNS):

- Ensures that changes to existing domain names, particularly in relation to service providers and government departments and agencies, are accompanied by timely community education campaigns that include information in a range of languages and are delivered via channels appropriate to CALD Australians.
- Distributes a community education campaign clearly outlining the implications of direct registration and which outlines processes and procedures that may be required for

individuals and entities to secure new domain names in addition to existing 2LD namespaces.

- Provides educational materials that are written in clear and simple English, offered in multiple languages and which also utilise icons and images to convey information.
- Distributes educational materials which incorporate targeted communications strategies, via a combination of channels to maximise awareness in different CALD cohorts.

FECCA is well placed to assist auDA with the creation and implementation of community education campaigns that target ethnic communities. FECCA has 23 state, territory and regional members and partners, and reaches over 1000 CALD community organisations from more than 200 ethnic communities. FECCA has experience providing community outreach services including outreach campaigns, media liaison, targeted community engagement, community consultations, community surveys, reviews, training and seminars. The organisation utilises a number of tools in service delivery such as FECCA e-news, social media, Mosaic Magazine, Positive CALD Ageing Network (PCAN) e-newsletter and the bi-annual FECCA National Conference.

Overview

As the digital economy continues to grow, it is important that CALD communities are given equal opportunity to engage in digital information provision and service delivery. Digital information provision refers to the communication mechanism used to inform customers about government services and often complements other methods such as print media, radio, and targeted messages to customers. Digital service delivery refers utilisation of online platforms to provide government services; for example, clients that may make a Medicare claim or complete their tax return online. Reforms to the Australia's Domain Name System (DNS) must consider those Australians from CALD backgrounds who may face additional barriers in accessing and navigating online services. With an increasing number of CALD Australians using the internet to access information and government services, FECCA emphasises that adverse impacts on communities by changes to existing domain names must be considered and mitigated.

Changes to established websites

In 2014-15, 7.7 million households or 86 per cent of all households were recorded as having access to the internet, with households with children aged under 15 years most likely to have access (97 per cent).¹ In 2016, FECCA published [Digital Access and Equity for Multicultural Communities](#), which found that that approximately 85 per cent of survey respondents use websites to find information about government services. The report found that for 41 per cent of respondents, online is the preferred method of obtaining information about government services, followed by face to face (29 per cent) and phone (18 per cent). The internet is increasingly utilised to access information from service providers, government departments and agencies, particularly in relation to welfare and health. CALD communities with varying levels of digital literacy may be adversely impacted by changes to the existing domain names of these service providers, departments and agencies.

FECCA recommends that any changes to existing domain names, particularly in relation to service providers and government departments and agencies, are accompanied by timely

¹ Australian Bureau of Statistics, 8146.9 – Household Use of Information Technology, Australia, 2014-15, <http://www.abs.gov.au/AUSSTATS/abs@.nsf/ProductsbyCatalogue/ACC2D18CC958BC7BCA2568A9001393AE?OpenDocument>

community education campaigns that include information in a range of languages and are delivered via channels appropriate to CALD Australians. FECCA also recommends the provision of educational materials that are written in clear and simple English, offered in multiple languages and which also utilise icons and images to convey information. Finally, FECCA recommends the distribution of educational materials which incorporate targeted communications strategies, via a combination of channels to maximise awareness in different CALD cohorts.

First come, first served principle

As noted by the auDA there are *“three fundamental principles that underpin the .au domain name registration system: (1) no proprietary rights in a domain name, (2) no hierarchy of rights, and (3) first come, first served.”*² It is possible that CALD communities with varying degrees of digital literacy will be disproportionately disadvantaged by the introduction of direct registration under the first come, first served principle.

A recent survey by CGU Insurance, found that one in three of all Australian small businesses are owned by migrants.³ The number of migrant-owner businesses in Australia totals over 620,000 and they employ over 1.41 million Australians, demonstrating a significant contribution to the Australian economy.⁴ The success of small businesses can hinge on having an online presence or a recognised domain name, particularly for businesses that are solely online. If CALD communities are not properly informed of reforms in a timely and appropriate way, they are likely to be disproportionately adversely impacted in the event that another entity or individual is first to undertake direct registration on any given domain name.

FECCA recommends that auDA distribute a community education campaign clearly outlining the implications of direct registration and which outlines processes and procedures that may be required for individuals and entities to secure new domain names in addition to existing 2LDs. As above, FECCA recommends campaigns that are easy to access, offered in multiple languages and distributed through a variety of channels.

² .au Domain Administration LTD, Registrant Policy: Enabling Australia’s Digital Economy and Society Issues Paper January 2018 <https://auda.org.au/assets/Uploads/PRP-Issues-Paper-Registrant-Policy-January-2018v3.pdf>

³ CGU, Migrant Small Business Report, 2018 https://www.cgu.com.au/migrantsmallbusiness/assets/CGU_Migrant_Small_Business_Report.pdf

⁴ Ibid.