

Ofcom has published a consultation document following a request from Blast 106 Limited, which holds a community radio licence for Belfast, to change the key commitments of its service Blast 106.

The station's key commitments describe the programme service, social gain objectives, access and participation, and accountability to the target community which it is required to provide, and forms part of the station's licence.

Blast 106's target community is stated as: "Students living in Greater Belfast from Queens University, the University of Ulster and Belfast Metropolitan College and young people living, working or studying in Greater Belfast".

Blast 106 Limited wishes to make changes to a number of its key commitments. These are under the headings 'programming', 'social gain objectives' and 'accountability to the target community'.

A request for a key commitments change can only be approved by Ofcom if it satisfies at least one of the five criteria set out in the Broadcasting Act 1990. If the proposed changes to the key commitments are deemed to substantially alter the character of service, Ofcom is required by statute to consult on the request.

Under section 106(1A) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004), Ofcom may consent to a change to key commitments only if it is satisfied that at least one of the following five statutory criteria is satisfied:

- that the departure would not substantially alter the character of service (section 106(1A)(a));
- that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community (section 106(1A)(b));
- that there is evidence that, among persons comprising that community, there is a significant demand for, or significant support for, the change that would result from the departure (section 106(1A)(d));
- that the departure would not be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities (section 106(1A)(e));
- or that the departure would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under that licence (section 106(1A)(f)).

The Community Media Association will examine the key commitments change requests from Blast 106 Limited under the headings of 'programming', 'social gain objectives' and 'accountability to the target community'.

Regarding 'programming', in response to the following question from Ofcom:

"Do you consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community?"

Blast 106 Limited advises:

“We are not proposing changes that would narrow the range of programmes as Blast106 will continue to be the only Student and Youth Radio Station for which the programmes are made by students and young people themselves and therefore continue to reflect their tastes and interests.

The proposed changes primarily seek to provide greater clarification on the timing of specific programming output and the factors affecting when certain material is aired (for example student elections only happen once a year in February/March so once we have covered these we cannot cover student elections again until the following year. In the same way student sports are seasonal and student news and politic/current affairs is dependent on news happening and government policies being introduced. The station does not have influence over these.”

Regarding ‘social gain objectives, in response to Ofcom’s question:

Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the service provided under your licence?

Blast 106 Limited advises:

Our proposed changes do not diminish our commitment to social gain for our community.

Indeed there are only a few minor alterations to the wording of the Social Gain section of the existing Key Commitments where we are mainly removing references to things which are already covered in other sections of the Key Commitments (such as in Programming).

And with regard to Blast 106’s ‘accountability to the community’ and the following question from Ofcom:

Do you consider that your proposed changes would be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities?

Blast 106 Limited responds:

We have not proposed any changes to the Key Commitments section dealing with Access & Participation.

Our proposed changes do not diminish our commitment to access, accountability or social gain for our community.

For example, we have removed entirely the reference to different membership grades as we have found that we did not need to introduce these and we did

not need to introduce a membership fee and we believe that retaining this in the Key Commitments is discriminatory.

We have also simplified the wording of how our community can participate in the democratic management of the station and provided clarity that all members, not just volunteers can participate in the management of the station.

It is the view of the Community Media Association that there are a number of community radio stations based in University towns and cities whose remit is to appeal to all young people in the locality. Stations such as these are able to appeal to and represent the interests of both the student and the indigenous youth population who have overlapping and similar tastes and sensibilities. We therefore believe that Blast 106 Limited's request does indeed meet criterion (a) of section 106(1A) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004) – that the departure would not substantially alter the character of service.

Additionally, looking at the proposed key commitments changes it would appear that Blast 106's remit of student programming is included in the proposed new format:

Existing key commitment: Blast 106 will be aimed at the student and youth population of Belfast. Programming will include output catering for the tastes and needs of minority student groups.

Proposed revised/new key commitment: Blast 106 will be aimed at the student and youth population of Belfast primarily aged 18-30.

Furthermore as 'students' on the whole represent a sub-set of 'young people' (mature students excepted, of course) there is likely to be little programming content for 'young people' that would not be of relevance and interest to 'students'. And it could possibly be argued that by changing programming focus from serving students to serving young people that Blast 106 Limited is expanding the remit and focus of the station. We therefore believe that this point fulfils the following criterion of section 106(1A) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004):

that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community (section 106(1A)(b));

Blast 106 intends to promote interaction between the station and the local community in debates and discussions on issues of interest and importance using a variety of methods and may include phone-in, text-in, email, post, Twitter, Facebook, snapshot and other methods resulting from technological and social media advances. This change reflects the advances in technology over the last 5 years since Blast 106 began broadcasting and the rise of social media in particular to allow interaction with the station using platforms that are relevant to the target community.

Considering social gain objectives a little more, Blast 106 is making no change to the provision of media training courses, volunteering opportunities and student

placements, clubs and society news, community news, promoting social enterprise, open training days, open access, and integrating the students of Queens University, University of Ulster and Belfast Metropolitan College as part of the wider youth community of Greater Belfast.

We therefore believe that the proposed key commitments relating to social gain objectives fulfil the following criterion of section 106(1A) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004):

that the departure would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under that licence (section 106(1A)(f)).

Blast 106 Limited advises that 'accountability to the local community' will be maintained as Blast 106 will hold a full members meeting each academic semester to which all members may attend, speak and vote irrespective of whether they are active volunteers at the time.

Blast 106 will have a governing Council that meets at least once per academic semester. The Council will consist of the voluntary Directors and a minimum of 6 members of which 3 will be students or alumni of each of the 3 academic institutions (Queens University, University of Ulster and Belfast Metropolitan College). These 'Council Members' will normally be elected but may be co-opted to ensure continued representation from each of the 3 academic institutions. The Council will submit a report on its activities to each full members meeting. There will be a variety of elected and appointed "Officer" positions, as determined by the members, as well as "Teams" which support these officers.

Additionally Blast 106 will have a published complaints procedure for both members of the station and for the general public. We therefore believe that the above points fulfil the following criterion of section 106(1A) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004):

that the departure would not be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities (section 106(1A)(e))

In conclusion therefore, it is the view of the Community Media Association that Blast 106 Limited **should** be permitted to make its proposed changes to the key commitments of Blast 106, with regard to the statutory criteria set out in Section 106 (1A) of the 1990 Broadcasting Act, as modified by the Community Radio Order 2004.