

Consultation response form

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Your response

Question	Your response
<p>Question 1: Do you have any views on our proposed new guidance?</p>	<p>Fully Confidential (but Ofcom may refer to contents if necessary)</p> <p>I respond in the context of radio broadcasting, but this applies equally across all areas of Ofcom’s regulation.</p> <p>I ask Ofcom as an individual please to remember minority groups (as defined by the Equality Act as “protected characteristics”).</p> <p>I am fully in support of equal access to the spectrum – Capital FM, Radio 1, Kiss and similar all serve an audience extremely well and deserve access to the airwaves.</p> <p>However, I work with minority groups such as Radio Seerah, Radio Panj, Vanny Radio, Inspiration FM, etc, and perhaps get more enjoyment from seeing how, to them, radio is really an essential lifeline – it is perhaps like revisiting radio in the 1980s.</p> <p>It is always a concern of mine how many groups like these have been disadvantaged through being rejected for a broadcast license when those who have a license often do not see the value in what they have or make efforts to comply with the requirements of that license.</p>

Whilst mechanisms such as spectrum auctions, AIP, etc, are excellent in many circumstances such as mobile telephone networks (and I fully support auctions for prime mobile telephone spectrum as it perhaps demonstrates the successful bidder has the financial means to establish a network, which is far more costly than the licences), minority audiences do require special protection.

I believe all of us, as human beings, carry with us an ethical and moral duty to help fellow human beings, especially where historic or current prejudice disadvantages those groups, or there are other barriers such as language, education, disability, etc.

Therefore, my request and input from myself is very simple:-

1: Ofcom must ensure that their processes make allowance for protected characteristics which are too easily overlooked

2: Ofcom must remember that these groups often struggle to represent themselves and Ofcom should try to engage with groups where they have perhaps not articulated their thoughts coherently or clearly enough but the intention is clear, to gain a better understanding of the situation. Simply asking for a one-line clarification, or in the case of a license where there is doubt, sending the group a "preliminary view" for comment and further evidence could resolve a whole number of issues.

3: Ofcom should be clearer in their communications with these groups and recognise that they historically have been forgotten or overlooked, often due to prejudices, and where it is not possible to

resolve their problems, it must clearly be conveyed the exact reasons why not and what actions need to be taken (such as legislative changes, finishing the current workplan then responding to future consultations, etc) in order to effect the outcome the group requires.

4: Ofcom employs a standard thinking between departments for these groups – telecoms (Such as broadband, etc), does an excellent job of recognising the needs of minority groups whereas other departments could do better.

Ofcom has limited resources and we are not asking Ofcom to spend a lot of time with every single group in the country no matter what their background, as sadly it seems some people enjoy wasting Ofcom's time just because they "want what someone else has", or for ego reasons.

However where a group is clearly committed to the betterment of society, clearly has suffered prejudice, clearly is underserved and not catered for and clearly is a protected characteristic and the proposal is to resolve those issues, we ask that Ofcom just try a little bit harder to help those groups.

I do thank Ofcom for what they do – I appreciate your job is extremely challenging and you have to deal with very conflicting demands from stakeholders, often in an emotionally charged confrontational situation. For this I pass you all my sympathies and my thanks.

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