Better Media's response

Question	Your response
Question 1: Do you agree with Ofcom's proposed approach to remove specific music genre requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N Better Media does not agree with Ofcom's proposed approach to remove specific music genre requirements from Key Commitments for analogue community radio stations. The following points outline our concerns and the evidence gathered during our consultation sessions: **1. Preservation of Diversity and Local Culture:** Specific music genre requirements ensure that community radio stations reflect the diverse cultural heritage of their local communities. Removing these requirements risks the homogenisation of content, leading to a reduction in the variety of music genres available. This was a key concern raised in our consultation sessions, where participants emphasised the importance of maintaining diverse and locally relevant music programming. **2. Support for Marginalised Voices:** Community radio stations play a crucial role in providing a platform for underrepresented and marginalised groups. Music genre requirements help ensure that niche and minority genres, which are often overlooked by commercial broadcasters, receive airtime. Our consultation highlighted that removing these requirements will marginalise these voices further, reducing the station's ability to serve its community effectively. **3. Community Identity and Engagement:** Music is a vital part of community identity. Stations that cater to specific music tastes can build strong, engaged listener bases. The loss of genre-specific commitments will lead to a disconnect between the station and its audience, as stations might shift towards more commercially viable but less community-focused content. This potential shift was a significant concern for stakeholders who participated in our sessions. **4. Evidence of Success:** Current music genre requirements have been instrumental in helping community radio stations differentiate themselves from commercial stations and in fostering a unique identity that resonates with their local audiences. Participants in our sessions provided numerous examples of how specific genre programming has successfully engaged communities, supported local artists, and preserved cultural heritage. **5. Risk of Commercialisation:** Without genre-specific commitments, stations will gravitate towards more mainstream and commercially successful genres to attract a broader audience. This shift will undermine the community-focused ethos of these stations and

Question	Your response
	compromise their public service mission. Our consultation indicated strong opposition to any move that might dilute the community-oriented nature of these stations.
	Based on these points, Better Media recommends that Ofcom retain the specific music genre requirements within the Key Commitments to ensure that community radio stations continue to serve their diverse and local communities effectively. The retention of these requirements is crucial for preserving the unique character, cultural diversity, and community focus of analogue community radio stations.
Question 2: Do you agree with Ofcom's approach to remove specific speech content requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N
	Better Media does not agree with Ofcom's proposed approach to remove specific speech content requirements from Key Commitments for analogue community radio stations. Our position is based on the following considerations, supported by evidence gathered during our consultation sessions:
	1. Ensuring Local Relevance: Specific speech content requirements are vital for ensuring that community radio stations produce locally relevant content that addresses the unique needs and interests of their communities. Removing these requirements risks diluting the local focus, leading to content that will not resonate with the community. Participants in our consultation sessions emphasised that locally produced speech content, such as community news, local interviews, and discussions on local issues, is a cornerstone of community radio's value proposition.
	2. Promoting Community Engagement: Speech content is essential for fostering dialogue and engagement within the community. It provides a platform for local voices to be heard and encourages active participation from community members. Our consultation highlighted that removing specific speech content requirements will reduce opportunities for community involvement and diminish the station's role as a facilitator of community dialogue and engagement.
	3. Support for Marginalised Groups: Community radio stations often serve as the only media outlet where marginalised and underrepresented groups can share their stories and perspectives. Specific speech content requirements help ensure that these voices are included and represented. Stakeholders in our sessions expressed concern that without these requirements, the inclusion of diverse voices and the coverage of issues affecting marginalised groups might decrease significantly.

Question	Your response
	4. Maintaining Accountability: Specific speech content requirements provide a clear framework for accountability, ensuring that stations deliver on their commitment to serve their community's needs. This framework helps Ofcom monitor and enforce standards effectively. Our evidence suggests that without these requirements, it would be challenging to measure and ensure the social impact of community radio stations. **5. Risk of Commercialisation:** Similar to the concerns with music genre requirements, removing speech content requirements will lead to a shift towards more commercially viable but less community-focused programming. This shift will undermine the mission of community radio stations to provide significant social gain and serve the public interest. Participants in our sessions were particularly wary of any changes that might lead to the commercialisation of community radio content. **6. Historical Success:** Historically, specific speech content requirements have been instrumental in the success of community radio stations. They have ensured a rich diversity of content that reflects the community's needs and interests. Our consultation provided numerous examples where dedicated speech content has significantly contributed to community cohesion and local engagement. Based on these points, Better Media strongly recommends that Ofcom retain the specific speech content requirements within the Key Commitments. These requirements are crucial for ensuring that community radio stations continue to serve their communities effectively, promote local engagement, and uphold their public service mission.
Question 3: Do you agree with Ofcom's approach to remove original output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N Better Media does not agree with Ofcom's proposed approach to remove original output requirements from Key Commitments for analogue community radio stations. Our response is based on the following points, supported by evidence gathered during our consultation sessions: **1. Ensuring Unique and Relevant Content:** Original output requirements ensure that community radio stations produce unique and locally relevant content that cannot be found elsewhere. This distinctiveness is crucial for differentiating community radio from other media outlets. Participants in our consultation sessions stressed the importance of original content in maintaining the station's local relevance and connection to the community.

Question	Your response
	2. Fostering Community Creativity and Participation: Original content creation encourages active participation from community members, fostering local talent and creativity. It provides opportunities for volunteers to develop skills in content production, which is essential for community engagement and capacity building. Our consultation highlighted that removing these requirements will reduce opportunities for community involvement and creative expression. **3. Maintaining High Standards and Accountability:** Original output requirements provide a clear framework for maintaining high standards and accountability. They ensure that stations are committed to producing high-quality, community-focused content. Our evidence suggests that without these requirements, it would be challenging to maintain the quality and social impact of community radio programming. **4. Support for Diverse Voices:** Original content requirements help ensure that diverse voices and perspectives are represented in community radio programming. This is particularly important for marginalised and underrepresented groups who will not have access to other media platforms. Stakeholders in our sessions expressed concern that without these requirements, the inclusion of diverse voices might decrease significantly. **5. Risk of Homogenisation and Commercialisation:** Removing original output requirements will lead to a shift towards more homogenised and commercially viable content, which will not reflect the community's needs and interests. This shift will undermine the mission of community radio stations to provide significant social gain and serve the public interest. Participants in our sessions were particularly wary of any changes that might lead to the commercialisation of community radio content. **6. Historical Evidence of Success:** Historical evidence indicates that original output requirements have been instrumental in the success of community radio stations. They have ensured a rich diversity of content that reflects the community's needs and interests. Our consultation provided numerous examples where original content has significantly contributed to community cohesion and local engagement. Based on these points, Better Media strongly recommends that Ofcom retain the original output requirements within the Key Commitments. These requirements are crucial for ensuring that community radio stations continue to produce unique, high-quality

Question	Your response
	content that serves the needs and interests of their local communities.
Question 4: Do you agree with Ofcom's approach to remove locally-produced output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N

Better Media does not agree with Ofcom's proposed approach to remove locally-produced output requirements from Key Commitments for analogue community radio stations. Our response is informed by the following points, supported by evidence gathered during our consultation sessions:

1. Preserving Local Identity and Relevance: Locally-produced content is essential for maintaining the local identity and relevance of community radio stations. It ensures that the programming reflects the unique characteristics and interests of the local community. Participants in our consultation sessions emphasised that locally-produced content is crucial for fostering a sense of community and belonging.

2. Supporting Local Talent and Economy: Local content production provides opportunities for local talent and supports the local economy. It enables local artists, journalists, and content creators to showcase their work and contribute to the station's programming. Our consultation highlighted that removing these requirements will reduce opportunities for local talent to participate in and benefit from community radio.

3. Enhancing Community Engagement and Participation: Locally-produced content encourages active engagement and participation from community members. It allows for community voices to be heard and for local issues to be addressed. Stakeholders in our sessions expressed concern that without these requirements, the connection between the station and its community will weaken, reducing overall community engagement.

4. Maintaining Accountability and Standards: Locally-produced output requirements provide a clear framework for accountability and help maintain high standards of community service. They ensure that stations remain committed to producing content that serves the needs and interests of their local communities. Our evidence suggests that without these requirements, it would be challenging to ensure that stations deliver on their commitments to their communities.

5. Preventing Homogenisation and Commercialisation: Removing locally-produced output requirements will lead to a shift towards more homogenised and commercially viable content, which will |

Question	Your response
	not reflect the community's needs and interests. This shift will undermine the mission of community radio stations to provide significant social gain and serve the public interest. Participants in our sessions were particularly wary of any changes that might lead to the commercialisation of community radio content.
	6. Historical Evidence of Success: Historical evidence indicates that locally-produced output requirements have been instrumental in the success of community radio stations. They have ensured a rich diversity of content that reflects the community's needs and interests. Our consultation provided numerous examples where locally-produced content has significantly contributed to community cohesion and local engagement.
	Based on these points, Better Media strongly recommends that Ofcom retain the locally-produced output requirements within the Key Commitments. These requirements are crucial for ensuring that community radio stations continue to produce content that is relevant, engaging, and beneficial to their local communities.
Question 5: Do you agree with Ofcom's proposed approach to language requirements for community radio stations? Please provide further information and/or evidence in support of your response.	Confidential? – N
	Better Media does not agree with Ofcom's proposed approach to remove or alter language requirements for community radio stations. Our response is based on the following considerations, supported by evidence gathered during our consultation sessions:
	1. Promoting Linguistic Diversity: Language requirements ensure that community radio stations promote and preserve linguistic diversity within their communities. This is especially important in multicultural and multilingual areas. Participants in our consultation sessions highlighted that language-specific programming is crucial for serving non-English speaking communities and promoting cultural heritage.
	2. Inclusive Communication: Language requirements help ensure that community radio stations provide inclusive communication that caters to all segments of the community, including those who will not be fluent in English. Our consultation underscored the importance of maintaining language diversity to ensure that all community members can access and benefit from the station's content.
	3. Representation of Minority Languages: Community radio plays a vital role in representing and promoting minority languages, which are often underrepresented in mainstream media. Stakeholders expressed concern that without language requirements,

Question	Your response
	the representation of minority languages will decline, marginalising non-English speaking groups further.

4. Strengthening Community Cohesion: Language-specific programming fosters community cohesion by bringing together people who share the same linguistic and cultural background. It also promotes cross-cultural understanding and integration. Our evidence suggests that removing language requirements will weaken these bonds and reduce the station's ability to serve as a platform for cultural exchange.

5. Maintaining Accountability and Standards: Language requirements provide a framework for accountability, ensuring that stations remain committed to serving the linguistic needs of their communities. This framework helps Ofcom monitor and enforce standards effectively. Our consultation indicated that without these requirements, it would be challenging to ensure that stations adequately cater to the linguistic diversity of their audiences.

6. Support for Community Identity: Language-specific programming contributes to the preservation of community identity and cultural heritage. It allows communities to express their cultural practices and traditions through their native languages. Participants in our sessions emphasised the importance of maintaining these requirements to support the cultural and linguistic identity of their communities.

Based on these points, Better Media strongly recommends that Ofcom retain the language requirements within the Key Commitments for community radio stations. These requirements are essential for promoting linguistic diversity, ensuring inclusive communication, and supporting the cultural and linguistic identity of communities. |
| **Question 6:** Do you agree with Ofcom's proposed approach to standardising language in the character of service descriptions for community radio stations? Please provide further information and/or evidence in support of your response. | Confidential? – N

Better Media does not agree with Ofcom's proposed approach to standardising language in the character of service descriptions for community radio stations. Our response is based on the following points, supported by evidence gathered during our consultation sessions:

1. Preserving Local Character and Identity: The unique character of each community radio station is defined by its specific community, culture, and local context. Standardising language in service descriptions risks eroding the distinctive character and identity of individual stations. Participants in our consultation sessions em- |

Question	Your response
	phasised the importance of maintaining tailored service descriptions that reflect the unique qualities and needs of their communities.
	2. Flexibility and Relevance: Tailored service descriptions allow community radio stations to remain flexible and responsive to the evolving needs and interests of their local communities. Standardised language will limit this flexibility, making it harder for stations to adapt their services in a way that is relevant and beneficial to their audiences. Our consultation highlighted the need for descriptions that can evolve with the community.
	3. Ensuring Meaningful Engagement: Specific and detailed service descriptions help ensure that stations engage meaningfully with their communities by providing content that is directly relevant to local needs and interests. Stakeholders expressed concern that standardised language will lead to generic descriptions that do not accurately represent the station's mission or its community engagement efforts.
	4. Accountability and Transparency: Detailed service descriptions provide a clear framework for accountability and transparency, allowing communities to understand what they can expect from their local radio stations. This clarity helps Ofcom monitor and enforce compliance effectively. Our evidence suggests that without detailed and specific descriptions, it would be challenging to hold stations accountable for their commitments to their communities.
	5. Supporting Diverse Voices: Community radio stations often serve diverse and underrepresented groups. Tailored service descriptions ensure that these groups are adequately represented, and their unique needs are addressed. Standardising language risks homogenising these descriptions, potentially overlooking the specific needs of diverse communities. Participants in our sessions stressed the importance of maintaining diverse and inclusive service descriptions.
	6. Historical Success: Historically, detailed and specific service descriptions have been instrumental in the success of community radio stations. They have ensured that stations remain focused on their community's needs and interests, providing content that is relevant and engaging. Our consultation provided numerous examples where tailored service descriptions have significantly contributed to community cohesion and local engagement.
	Based on these points, Better Media strongly recommends that Ofcom retain the current approach to service descriptions, allow-

Question	Your response
	ing for tailored and specific language that reflects the unique character, needs, and interests of each community radio station. This approach is crucial for preserving the distinctiveness and effectiveness of community radio services.
Question 7: Do you agree with Ofcom's assessment of the impacts of its proposed changes? Please provide further information and/or evidence in support of your response.	Confidential? – N

Better Media does not agree with Ofcom's assessment of the impacts of its proposed changes to the Key Commitments for community radio stations. Our response is informed by the following points, supported by evidence gathered during our consultation sessions:

1. Increased Administrative Burden: Ofcom's assessment seems to underestimate the administrative burden that the proposed changes would place on community radio stations, particularly smaller and volunteer-run stations. While the intention will be to streamline processes, the lack of specific commitments will lead to more complex and nuanced reporting requirements to demonstrate compliance. Participants in our consultation sessions expressed concerns that the proposed changes would increase, rather than decrease, the administrative workload.

2. Loss of Local Relevance and Community Focus: The proposed changes risk diminishing the local relevance and community focus of community radio stations. By removing specific requirements for locally-produced content, original output, and speech content, there is a significant risk that stations will shift towards more generic and commercially viable programming, undermining their role in serving local communities. Our consultation highlighted that the proposed changes would lead to a reduction in content that reflects local issues and interests, which is central to the mission of community radio.

3. Erosion of Accountability and Standards: Specific Key Commitments provide a clear framework for accountability and help maintain high standards of community service. Removing these commitments would make it more difficult for Ofcom to monitor and enforce standards effectively. Our evidence suggests that the proposed changes will lead to inconsistent implementation and a reduction in the overall quality of community radio services.

4. Impact on Marginalised and Underrepresented Groups: Community radio stations play a crucial role in providing a platform for marginalised and underrepresented groups. The proposed changes will reduce the representation of these groups, as stations will pri- |

Question	Your response
	oritise more mainstream and commercially viable content. Stakeholders in our sessions expressed concern that without specific commitments, the unique needs of diverse communities might be overlooked.

5. Funding and Financial Viability: The proposed changes will impact the ability of community radio stations to secure funding and support. Funders often require clear evidence of impact and compliance with specific commitments. The move towards qualitative metrics and the removal of specific requirements will complicate funding applications and reduce the ability of stations to demonstrate their social value effectively. Our consultation indicated that these changes would jeopardise the financial viability of many community radio stations.

6. Community Trust and Engagement: Clear and specific commitments help build and maintain community trust. The proposed changes will erode this trust by making it more difficult for community members to understand what they can expect from their local community radio stations. Participants in our sessions highlighted the importance of maintaining transparency and accountability to ensure continued community engagement and support.

Based on these points, Better Media strongly disagrees with Ofcom's assessment of the impacts of its proposed changes. We recommend that Ofcom conducts a more thorough and comprehensive impact assessment, considering the potential negative effects on the administrative burden, local relevance, accountability, representation of marginalised groups, funding, and community trust. |
| **Question 8:** Are there any impacts of these proposals which Ofcom has not recognised in this document? | Confidential? – N

Better Media believes that there are several significant impacts of Ofcom's proposals that have not been adequately recognised. Our response is based on the following points, supported by evidence gathered during our consultation sessions:

1. Impact on Volunteer Engagement and Training: The role of community radio stations in providing training and development opportunities for volunteers is crucial. The proposed changes will undermine these opportunities by reducing the emphasis on locally-produced and original content, which often involves volunteer participation. Our consultation highlighted that volunteers play a vital role in producing diverse content, and any reduction in these activities will lead to decreased volunteer engagement and |

Question	Your response
	fewer training opportunities, impacting community capacity building.

2. Risk of Diluting Community Representation: Community radio stations often serve as a vital platform for underrepresented and marginalised groups. The removal of specific content and engagement requirements will lead to a reduction in programming that represents these groups. This impact has not been fully acknowledged in Ofcom's proposals. Stakeholders in our sessions expressed concern that the proposed changes might result in less inclusive content, reducing the stations' role in promoting diversity and social cohesion.

3. Potential Loss of Community Trust: Trust between community radio stations and their listeners is built on the delivery of locally and culturally relevant and accountable content. The proposed changes will erode this trust by making it harder for listeners to hold stations accountable for their commitments. Our consultation indicated that community members value the specific commitments that ensure stations deliver content that reflects their needs and interests. The loss of these commitments will lead to a decline in listener trust and engagement.

4. Challenges in Demonstrating Social Gain: The shift from specific commitments to more general, qualitative metrics will make it harder for stations to demonstrate their social impact. Funders and stakeholders often require clear, measurable evidence of social gain, which the current framework provides. Our evidence suggests that the proposed changes will complicate the process of demonstrating impact, making it more difficult for stations to secure funding and support.

5. Economic Impact on Smaller Stations: Smaller and volunteer-run stations might struggle disproportionately with the proposed changes. The increased complexity in demonstrating compliance with less defined requirements will impose a significant administrative and financial burden. Participants in our sessions highlighted those smaller stations, which often operate with limited resources, might find it challenging to navigate the new framework, potentially threatening their sustainability.

6. Long-term Sustainability of Community Radio: The overall sustainability of community radio stations will be compromised by the proposed changes. The specific commitments currently in place help ensure a stable framework that supports the unique mission of community radio. Our consultation raised concerns that the pro-

Question	Your response
	posed deregulation will lead to a gradual erosion of the community-focused ethos, pushing stations towards more commercial content and undermining their long-term sustainability.
	Based on these points, Better Media believes that Ofcom's proposals do not fully recognise the broader impacts on volunteer engagement, community representation, trust, the ability to demonstrate social gain, the economic viability of smaller stations, and the long-term sustainability of community radio. We recommend that Ofcom conducts a more comprehensive assessment of these impacts before proceeding with any changes.
Question 9: Do you agree with our assessment of the potential impact of our proposals on the Welsh language? Please provide further information and/or evidence in support of your response.	Confidential? – N
	Better Media does not agree with Ofcom's assessment of the potential impact of its proposals on the Welsh language. Our response is informed by the following points, supported by evidence gathered during our consultation sessions:
	1. Preservation of the Welsh Language: Community radio stations play a critical role in promoting and preserving the Welsh language, especially in areas where Welsh is spoken as a first language. The proposed changes will undermine this role by removing specific content and language requirements that ensure the representation and promotion of Welsh. Participants in our consultation sessions stressed the importance of maintaining strong commitments to support Welsh language programming.
	2. Cultural Identity and Heritage: The Welsh language is an integral part of the Welsh cultural identity and heritage. Community radio stations that provide Welsh language content help foster a sense of pride and continuity in the local culture. Our consultation highlighted concerns that the removal of specific commitments will lead to a decline in Welsh language content, weakening the cultural fabric of Welsh-speaking communities.
	3. Accessibility and Inclusion: Welsh language programming ensures that Welsh speakers can access information and participate fully in their community's media landscape. Without specific requirements, there is a risk that Welsh language content will be deprioritised, reducing accessibility for Welsh speakers. Stakeholders expressed concern that the proposed changes will marginalise Welsh-speaking audiences and reduce their access to relevant content.
	4. Educational Role: Community radio stations often serve an educational role by promoting the Welsh language among new learn-

Question	Your response
	ers and younger generations. The current commitments help ensure that these educational aspects are included in programming. Our evidence suggests that removing these commitments will diminish the educational opportunities provided by community radio stations to promote and teach the Welsh language. **5. Economic Impact on Welsh Language Stations:** Stations that produce Welsh language content might face additional economic pressures if specific requirements are removed. These stations often rely on funding that is contingent upon their commitment to providing Welsh language programming. Participants in our sessions expressed concern that the proposed changes will jeopardise funding opportunities and threaten the financial viability of Welsh language stations. **6. Community Engagement and Trust:** Welsh language content helps build and maintain trust and engagement within Welsh-speaking communities. The proposed changes will erode this trust by making it more difficult for community members to hold stations accountable for their Welsh language commitments. Our consultation indicated that maintaining specific commitments is crucial for ensuring continued community support and engagement. Based on these points, Better Media strongly recommends that Ofcom reassesses the potential impact of its proposals on the Welsh language. We believe that the current commitments are essential for promoting and preserving the Welsh language, supporting cultural identity, ensuring accessibility and inclusion, providing educational opportunities, and maintaining community trust and engagement. We urge Ofcom to retain these commitments to protect the interests of Welsh-speaking communities.
Question 10: Do you think our proposal will be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?	Confidential? – N Better Media believes that Ofcom's proposal will indeed be revised to ensure or increase positive effects and reduce/eliminate any negative effects on opportunities to use the Welsh language, and to ensure that the Welsh language is treated no less favourably than English. Our response is based on the following suggestions, supported by evidence gathered during our consultation sessions: **1. Retention of Specific Language Commitments:** To ensure the Welsh language is promoted and treated equitably, Ofcom should retain specific language commitments for community radio stations that serve Welsh-speaking communities. These commitments should mandate a minimum amount of Welsh language content,

Question	Your response
	ensuring that Welsh language programming remains a core component of the station's output.
	2. Enhanced Funding and Support: Ofcom should provide enhanced funding and support for community radio stations that produce Welsh language content. This will include grants, training, and resources specifically aimed at supporting Welsh language programming. Our consultation highlighted that financial and technical support is crucial for sustaining Welsh language content, particularly for smaller stations.
	3. Clear Guidelines and Standards: Ofcom should develop clear guidelines and standards for Welsh language content, ensuring that stations understand their obligations and can effectively meet them. This will include detailed criteria for the types and amounts of Welsh language programming required, as well as best practices for promoting and incorporating the Welsh language into their content.
	4. Regular Monitoring and Evaluation: To ensure compliance and promote continuous improvement, Ofcom should implement regular monitoring and evaluation of Welsh language content. This will involve periodic reviews of station output, community feedback mechanisms, and assessments of the impact of Welsh language programming on community engagement and cultural preservation.
	5. Community Engagement and Participation: Ofcom should encourage stations to actively engage with Welsh-speaking communities to ensure that their content meets the needs and interests of these audiences. This will include community consultations, partnerships with local Welsh language organisations, and initiatives to involve Welsh speakers in content production and station management.
	6. Promotion of Welsh Language Education: Community radio stations can play a significant role in promoting Welsh language education. Ofcom should support initiatives that use community radio as a platform for teaching and promoting the Welsh language, particularly among younger generations and new learners. Our consultation emphasised the importance of educational content in sustaining and revitalising the Welsh language.
	7. Incentives for Welsh Language Innovation: Ofcom should introduce incentives for innovative Welsh language programming, encouraging stations to develop new and creative ways to engage Welsh-speaking audiences. This will include awards, recognition

Question	Your response
	programs, and funding for pilot projects that showcase innovative approaches to Welsh language content.
	By incorporating these suggestions, Ofcom can ensure that its proposals support the promotion and preservation of the Welsh language, treat the Welsh language no less favourably than English, and enhance opportunities for Welsh speakers to engage with community radio. Better Media strongly recommends that Ofcom revise its proposals to include these measures, ensuring positive outcomes for Welsh-speaking communities.
Question 11: Do you agree with our proposed compliance principles?	Confidential? – N
	Better Media does not agree with Ofcom's proposed compliance principles as they currently stand. Our response is based on the following points, supported by evidence gathered during our consultation sessions:
	1. Need for Clear and Specific Commitments: Compliance principles should include clear and specific commitments that community radio stations must meet. These commitments provide a framework for accountability and help ensure that stations deliver on their mission to serve their communities. Our consultation highlighted concerns that vague or overly flexible compliance principles will lead to inconsistent implementation and reduced standards.
	2. Maintaining High Standards of Community Service: Compliance principles must uphold high standards of community service, ensuring that stations continue to provide locally and community relevant and diverse content. This includes maintaining requirements for locally-produced content, original output, and speech content. Participants in our sessions emphasised that these standards are essential for preserving the unique value of community radio.
	3. Ensuring Transparency and Accountability: Effective compliance principles must include mechanisms for transparency and accountability. This means regular monitoring and reporting, community feedback mechanisms, and clear guidelines for enforcement. Our evidence suggests that without robust transparency and accountability measures, it would be challenging to ensure that stations meet their commitments to their communities.
	4. Support for Marginalised and Underrepresented Groups: Compliance principles should explicitly address the need to support marginalised and underrepresented groups. This includes maintaining commitments to provide content that reflects the diversity of the community and ensuring that these voices are represented in programming. Stakeholders in our sessions expressed concern

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	that the proposed principles do not sufficiently address the needs of these groups.

5. Balancing Flexibility with Rigour: While flexibility is important, compliance principles must also be rigorous enough to ensure meaningful outcomes. Our consultation highlighted that overly flexible principles will lead to a reduction in the quality and relevance of content. It is crucial to strike a balance that allows stations to innovate while still maintaining high standards and accountability.

6. Economic and Operational Support: Compliance principles should include provisions for supporting the economic and operational sustainability of community radio stations. This includes access to funding, training, and resources that help stations meet their commitments. Participants in our sessions emphasised that without adequate support, many stations, particularly smaller and volunteer-run ones, will struggle to comply with the principles.

7. Regular Review and Adaptation: Compliance principles should be subject to regular review and adaptation based on systematic feedback from stations and communities, avoiding anecdotal and self-serving representations. This ensures that the principles remain relevant and effective in addressing the evolving needs of the community radio sector. Our evidence suggests that a dynamic and responsive approach is essential for maintaining the effectiveness of compliance principles.

Based on these points, Better Media recommends that Ofcom revise its proposed compliance principles to include clear and specific commitments, uphold high standards of community service, ensure transparency and accountability, support marginalised and underrepresented groups, balance flexibility with rigour, provide economic and operational support, and include provisions for regular review and adaptation. These revisions are crucial for ensuring that community radio stations continue to serve their communities effectively and uphold their public service mission.

Overall, Better Media is deeply concerned about Ofcom's proposals to alter the Key Commitments for community radio stations. These proposals, if implemented, would fundamentally undermine the core character of service obligations that are enshrined in legislation delineating the parameters of community radio, for example the commitment to exclusively local services. The specific Key Commitments currently in place are crucial for ensuring that analogue community radio stations deliver significant social gain and address social needs effectively.

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	By removing or altering these commitments, Ofcom risks reducing the capacity of community radio stations to serve their communities in meaningful ways. The existing commitments ensure that community radio stations produce locally relevant content, support diverse and underrepresented voices, and maintain high standards of accountability and community engagement. These elements are essential for preserving the unique value and public service ethos of community radio.
	Furthermore, the proposed changes will lead to a homogenisation of content, prioritisation of commercially viable programming over community-focused content, and an overall decline in the quality and relevance of community radio services. This would be detrimental to the social fabric of communities that rely on community radio as a vital source of local information, cultural representation, and social cohesion.
	Ofcom has not mapped out how it anticipates changes made in the Media Act 2024 will affect radio broadcasting more generally, nor have Ofcom conducted an analysis of the risk factors associated with AI-driven content, networked platforms and anticompetitive practices that reduce the availability of capacity on DAB platforms, and 'land-bank' analogue frequencies.
	Better Media proposes that Ofcom should not proceed with these changes to the Key Commitments. Instead, Ofcom should allow for new applications for analogue radio services, providing an avenue for existing community radio services that do not wish to meet these specific Key Commitments to transition to Independent licences. This approach would ensure that community radio stations committed to their public service mission can continue to operate effectively, while those seeking greater flexibility can explore alternative licensing options.
	In conclusion, it is imperative that Ofcom preserves the integrity of community radio by maintaining the specific Key Commitments that are essential for delivering social gain and addressing social needs. This will ensure that community radio stations continue to serve their communities with the dedication and focus that have made them invaluable local resources.

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Appendix: Better Media Consultation Evidence Summary

Better Media Consultation on Community Radio Key Commitments Reporting Response Summary

1   Recommendations

Better Media expects that any changes to the Key Commitments Reporting requirements for analogue community radio do not undermine the social purpose and operational effectiveness of community radio stations, specifically the provision of 'significant' social gain. The following specific recommendations set out our belief that Ofcom should delay any changes until a comprehensive review by the new government into the wider social purpose of community radio and community media more generally in the UK has been conducted. These recommendations highlight our concerns that the proposed changes will increase Ofcom's workload and impose a greater burden on community radio stations.

1.1   Maintain Current Key Commitments Until Government Review

Ofcom should defer implementing any changes to the Key Commitments reporting requirements until a thorough review by the new government is completed. This review should assess the broader social purpose of community radio and community media in the UK to ensure any regulatory changes align with the public sector's strategic communication and community development goals, while noting changes made in the Media Act 2024.

1.2   Conduct an Equality and Economic Impact Assessment

Before any changes are made, Ofcom should commission and conduct an independent and detailed equality and economic impact assessment with the aim of providing verifiable evidence of the administrative and financial burdens that the proposed changes might impose on community radio stations. This assessment should include consultations with a wide range of public service, civic and community organisations, public authorities and social funding organisations, to gather comprehensive data about the need for community-focussed media and communications.

1.3   Enhance Stakeholder Consultation

Ofcom should expand its stakeholder consultation process to include more voices from the public, community and civic-society sectors, particularly public service organisations that are presently dependent on forms of mass communication dominated by consolidated and networked service providers. This will help ensure that the proposed changes reflect the needs and capacities of the wider social sector, specifically the not-for-private-profit sector, such as charities, education establishments, religious establishments, and other public service providers,

and better aligning the public, civic, and community services sectors with the community me-
dia sector.

1.4   Retain Specific Content and Engagement Quotas

To ensure that community radio stations continue to deliver local and culturally relevant and
meaningful content, news and information, Ofcom should retain specific quotas and safe-
guards for original and locally produced content, news, and information that is unique and
clearly different from automated or simulated content. These quotas help maintain the sta-
tions' unique community focus and public service role.

1.5   Develop Clear and Consistent Standards

If any changes are to be considered, Ofcom should develop clear and consistent standards for
qualitative and quantitative forms of assessments, based on a defined methodology, to avoid
ambiguity and ensure stations understand what is expected of them. This will help maintain ac-
countability and high standards across the sector.

1.6   Provide Enhanced Guidance and Support

Ofcom should provide detailed guidance and additional support to help stations transition to
any new reporting requirements. This must include minimum evaluation criteria, training stand-
ards, peer-reviewed evaluation and assessment models, and easily accessible resources that
explain the new standards to a broad range of service providers, as well as the public.

1.7   Implement Robust Monitoring and Feedback Systems

To ensure ongoing compliance and accountability, Ofcom should implement robust monitoring
and feedback systems. These systems should allow for regular reviews and community input to
ensure that stations are effectively meeting their commitments. Ofcom's own public-facing
data systems are themselves antiquated and do not allow independent researchers to extract
and assess data thoroughly.

1.8   Protect Funding and Support Opportunities

Any changes to the reporting requirements should not jeopardise the ability of stations to se-
cure funding and support. Ofcom should work with local and national civic and social funding
bodies to ensure that the new requirements align with widely used social and public funding cri-
teria, in such a way that they do not create additional barriers.

1.9   Prioritise Localism and Community Engagement

Ofcom should prioritise localism and community engagement in its regulatory framework. This includes ensuring that any changes support stations in continuing to provide a platform for underrepresented voices and fostering community participation.

1.10   Review Administrative Impact on Smaller Stations

Given that smaller, volunteer-run stations may struggle with increased administrative burdens of any kind, Ofcom should undertake assessment trials to review the specific impact of any proposed changes on the reporting requirements of stations. This review should aim to maximise capacity building within stations to ensure that all community radio stations can continue to operate effectively without undue strain.

By considering these recommendations, Ofcom can ensure that any changes to the Key Commitments Reporting Requirements for analogue community radio support the sector's sustainability, effectiveness, and social purpose. This approach will help maintain the distinctive character of community radio and its vital role in serving diverse and local communities across the UK.

2   Introduction and Background

This document provides a summary of the consultation undertaken by Better Media and Decentered Media in response to Ofcom's consultation on proposed changes to the reporting of Key Commitments for analogue community radio in the UK. The discussions that inform this submission involved four online dialogue sessions, held in April and May 2024, with participants from various community radio stations, civic society organisations, education and training organisations, media democracy advocates, as well as feedback from Better Media members. The responses of the participants have been anonymised to protect their identities and opinions.

Better Media is a member organisation and campaign group that advocates for media diversity and pluralistic use of different platforms in the interests of citizens in the UK. Decentered Media is a consultancy and training provider that supports community-focused forms of communication and media, with the aim of empowering and engaging people across different communities, places and social boundaries.

This submission is guided by the principles of access and participation to and in media as a human right, as a mechanism for improved civic participation, as platforms for self-representation and creative expression, with a social cohesion focus, and as a pluralistic model of economic and social development. These principles reflect the core democratic values and objectives of community radio, which aim to empower people and their communities by fostering dialogue, diversity, and social solidarity.

By proposing changes to the Key Commitments reporting framework, Ofcom must ensure that these principles are upheld and protected, and that community radio stations will continue to deliver high-quality, locally relevant, and socially beneficial programming to their audiences.

2.1   Ofcom's Consultation on Key Commitments

The Key Commitments for analogue community radio services in the UK, regulated by Ofcom, are detailed service descriptions included in each community radio station's licence, reflecting the proposals made during their competitively awarded application process. These commitments currently encompass specific requirements and quotas concerning the amount and scheduling of original and locally produced content, as well as the types of content provided, such as particular music genres or speech output. The primary function of these Key Commitments is to identify the community served by the station and ensure that its needs and interests are mirrored in the station's output. Additionally, the commitments outline how the station will encourage community participation through volunteering, training, management, and feedback, thereby contributing to the social gain purpose and role of community radio.

Ofcom has proposed to streamline and simplify these Key Commitments by removing specific quotas for original and locally produced content. The stated intention behind this proposal is to grant stations greater flexibility while still ensuring they deliver social gain and community benefits. Under the proposed changes, Ofcom would review each station's Key Commitments, preserving core aspects valuable to the target community, such as specific music genres or speech content. However, stations would no longer need to meet rigid quotas for original and local output, provided they will demonstrate effective community service.

The consultation, according to Ofcom, addresses several challenges reported by analogue community radio stations. There is uncertainty regarding the future licensing framework, as analogue community radio licences will begin expiring from October 2025. The government is consulting on provisions to allow licence extensions. Additionally, current restrictions on revenue generation from advertising and sponsorship, aimed at protecting the non-commercial

character of community radio, are asserted to limit growth opportunities. Smaller stations, in particular, face difficulties accessing suitable digital infrastructure and affording the costs associated with digital broadcasting technologies, performance rights licences, and increased costs due to inflationary demands.

It is important to note that this consultation does not reflect the general views and needs of the community radio sector, as no systematic processes or sentiments analysis has been undertaken by Ofcom or commissioned by others. Moreover, we believe this consultation is a response to a vocal minority of individuals that have expressed separate concerns about their operational viability under the current Key Commitments framework. Ofcom has acknowledged that it has limited tools and evidence to assess the impact of its proposed changes on the quality and diversity of community radio programming and the level of social gain delivered by stations.

2.2   Consultation Flaws

One of the major flaws of this consultation is that Ofcom has not provided any systematic evidence or indicative framework to accompany its proposals. There is no clear evidence of how Key Commitments reporting is currently carried out by stations, how they have evolved, and how they are influenced by other social, economic and political factors. Without such data, it is impossible to conduct meaningful benchmarking or comparative analysis of the impact of Key Commitments on the quality and diversity of community radio content and the delivery of social gain.

This lack of evidence raises questions about the validity and representativeness of Ofcom's claims that stations are struggling to comply with their Key Commitments due to operational and financial constraints. The consultation seems to be based on anecdotal feedback from a minority of individuals, rather than on rigorous research and consultation with the wider civic and social sector. Therefore, Ofcom's proposed changes appear to be arbitrary and unsubstantiated, and will have unintended and detrimental consequences for the community radio sector if they are not verified and independently assessed.

It is important to note that Ofcom's consultation policy does not involve Ofcom commissioning evidence, but rather relies on respondents to submit evidence to support their views and proposals. This may result in a skewed and partial picture of the sector, as different stakeholders may have different agendas and pursue vested interests. For instance, trade associations and

commercial operators may seek to influence the consultation process to gain competitive advantage or undermine community radio's distinctiveness.

We believe it is essential that Ofcom apply a rigorous and transparent evaluation framework to assess the quality and reliability of the evidence submitted, and to ensure that the consultation reflects the genuine needs and aspirations of the community radio sector, those who framed the original legislation on which it is based, and those who are motivated to continue to provide 'significant' levels of social gain.

Another factor that will affect the outcome of this consultation is the recent passage of the Media Act 2024, which was included in the 'wash-up' process before the prorogation of parliament for the General Election. The Media Act introduces significant changes to the regulation and funding of independent radio, which will inevitably have a knock-on in the way that Ofcom awards licences and grants extensions. However, the Media Act does not address the issue of Key Commitments, which remains under Ofcom's discretion, and is subject to possible future changes by DCMS as to the terms of any renewal of the Community Radio Order.

It should be noted that Ofcom has not indicated any intention to allocate additional resources or staff to the regulation and oversight of community radio, which may raise suspicions that this consultation is a pretext for reducing its involvement and accountability in this area. Furthermore, Ofcom's online data management systems are outdated and inefficient, and do not allow for independent scrutiny and analysis of how community radio stations might be fulfilling their Key Commitments, especially since the requirement to publish such information on the Ofcom website was removed in 2015. Therefore, this consultation may be seen by some as an attempt to weaken the distinctive identity and value of community radio, rather than to support its sustainability and development.

2.3 Proposed Changes

The proposed deregulation of Key Commitments raises concerns about the potential erosion of community radio's social value and distinctiveness. Critics argue that removing specific content and engagement requirements will lead to a reduction in local programming, undermining one of the core purposes of community radio: *serving niche interests and giving voice to underrepresented groups*.

Furthermore, there are fears that deregulation will result in homogenised content, as stations will prioritise commercially viable programming over distinctive, community-focused offerings.

Without clear, measurable requirements, it will become more challenging for Ofcom to enforce standards and ensure stations deliver adequate social gain to their target communities. We believe these changes will enable networking and unjustifiable shared content provision through the back door, further reducing the provision of uniquely local and community-specific content.

2.4 Addressing Concerns

To address these concerns, community radio stations should be required to adopt various evaluation and monitoring processes to demonstrate compliance with their Key Commitments. This evaluation and monitoring must be publicly available and subject to scrutiny. Typically, this would include maintaining detailed program logs and content analysis, conducting regular listener surveys, engaging in community outreach, and compiling comprehensive annual reports. Stations will also benefit from enhanced guidance and support from Ofcom, ensuring they understand and meet new requirements effectively.

Another issue that Ofcom should consider is the use of language that determines what each station's requirement to provide social gain should be in practice. Currently, Ofcom requires analogue community radio services to provide '*significant*' social gain, while digital community radio services (C-DSPs) are only required to provide '*some*' social gain. This has created a discrepancy between the two types of community radio services and has led to confusion and inconsistency in reporting and assessment.

Moreover, the proposed deregulation of Key Commitments reporting will create an incentive for stations to give up their analogue licences and switch exclusively to SSDAB services, which have lower social gain obligations and therefore lower operating expenses. This will result in a loss of diversity and localism in the community radio sector, as well as a reduced quality of service for listeners who rely on analogue radio. Therefore, Ofcom should clarify the meaning and expectations of the terms '*significant*' and '*some*' in relation to social gain, and ensure that they are applied consistently, appropriately and fairly across all community radio services.

2.5 Incentives to Provide Significant Social Gain

Another aspect that Ofcom must consider is the uneven distribution of opportunities and incentives for community and independent radio services to access different types of platforms or spectrum capacity. Since 2018, Ofcom has not run any licencing rounds for new analogue licences for community or independent radio, while it has been actively promoting and facilitating the development of Small-Scale DAB services across the UK. This means that the market is

now distorted, and that there is a potential under-representation of operators interested in acquiring analogue licences. Moreover, it is unrealistic to assume that the proposed digital switch-over will ever occur, as many listeners still rely on analogue radio for their information and entertainment needs. The BBC's own figures note that forty-four per cent of Radio Two listening remains on FM in 2023.

In many urban areas where demand is highest, the local and regional DAB multiplexes are often full. Therefore, if greater flexibility in supply is enabled, then increased capacity in the market would enable more flexibility at reduced cost for smaller operators. This should be possible following the elimination of vestigial constraints from the Broadcasting and the Communications Acts, which have now been removed by the Media Act. Independent radio licencing has now been deregulated, so Ofcom can easily determine more ways to diversify the supply of services by enforcing, for example, that all current DAB services transition to DAB+, while also ending any simulcasting between DAB and FM/AM platforms. As national and international broadcasters turn off their AM transmitters, Ofcom must ensure this spectrum is made available for both commercial and community use.

Therefore, and given that the SSDAB roll-out is nearing completion, we believe Ofcom's priority should be to increase access to all forms of spectrum where it is available, preferably on an on-demand basis, including AM and FM. We favour the market being used as the mechanism to gauge interest in shifting and changing service types because we are no in a post-scarcity environment for the provision of media services. However, any residual protectionist and anti-competitive operating practices must be eliminated by Ofcom as part of its competition and markets responsibilities, if deregulation is to achieve the effect of diversifying supply.

It is our expectation that a significant number of community radio services will want to transition to independent licences, should they be available, now that most of the regulatory obligations have been removed by the Media Act. Ofcom is no longer obliged to determine the nature and character of services in each area. This should enable and support innovation and the transition between service types, ensuring that those community radio that remain are vibrant and reflect the diverse needs of different communities while serving the wider public interest.

2.6   Demonstrating Consistency

In addition, it is important to note that the award process for analogue community radio licences requires consistent delivery across the whole duration of the period of the licence. This is known by applicants when they submit their proposals in a competitively managed licence

round. Therefore, stations should be obliged to adhere to their responsibilities and demonstrate their social value and impact throughout their licence term. Ofcom should therefore provide clear guidance and feedback to stations on how to report their Key Commitments effectively and efficiently and recognise and reward good practice and innovation in the sector.

If it is the case that analogue community radio stations face an increased administrative burden that comes with fulfilling their Key Commitments and reporting them to Ofcom, this does not automatically mean that the data metrics being considered are wrong. This may well be an indication of the lack of capacity for professional social-sector management within those stations. Changing the Key Commitments criteria, we believe, will inevitably divert resources and attention away from producing quality content, social experiences and meaningful engagement with the different communities that are being served.

However, it is important to note that the awards of analogue community radio licences are made on the basis that Ofcom believes each individual applicant can sustain their services to the appropriate standards, with consistent delivery across the whole duration of the period of the licence. If this is known by applicants when they submit their application in a competitively managed licence round, but subsequently they are unable to maintain this commitment, then they have the option of surrendering their licence. Ofcom, however, must offer these surrounded licences to other groups who may wish to take on the responsibility of meeting these commitments.

Consequently, stations should expect to adhere to their obligations and demonstrate their social value and impact throughout their licence term. Ofcom should therefore provide clear guidance and feedback to stations on how to report their Key Commitments effectively and efficiently, while also recognising and rewarding good practice and innovation in the sector. The question that needs to be addressed, is what is the remaining incentive for any community radio service provider to continue to seek to provide 'significant' social gain?

2.7   Untested Assumptions

While it is possible to assert that community radio stations face increased administrative burdens, such as those that come with fulfilling their Key Commitments and reporting them to Ofcom, it should not be assumed that this is the case for all community radio stations when placed under proper examination. We believe that changing the key commitments reporting criteria will be counter-productive and divert resources and attention away from stations' ambitions to produce quality content and engage with their communities. Moreover, while Ofcom's

consultation on Key Commitments Reporting for Analogue Community Radio may well seek to balance the need for flexibility with the imperative to maintain community radio's distinctiveness, localism, and social value, the outcome of this consultation will have substantial implications for the future of community radio in the UK, particularly its ability to continue serving diverse and underrepresented communities effectively.

2.8   Summary of Consultation Findings

The following sections of this document present a summary of the main themes and issues that emerged from the discussions and consultation sessions undertaken by Better Media and Decentered Media with community radio practitioners, academics, and stakeholders across the UK. The aim of these consultations was to gather views and opinions on Ofcom's proposals for changes to Key Commitments reporting for Analogue Community Radio stations and how they may affect the sector's distinctiveness, localism, and social value. The summary is not intended to be exhaustive or representative of all community radio perspectives, but rather to highlight some common and diverse views expressed by the participants.

3   Increased Administrative Burden

Participants in the consultation sessions raised several concerns related to the regulatory burdens associated with the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential negative impact on the stations' ability to fulfil their community-focused roles and maintain their unique identity. The main issues include:

- **Detailed Reporting Requirements:** Participants expressed concerns that even with proposed deregulation, the need to provide evidence of compliance with broader and potentially less clearly defined criteria will lead to increased administrative tasks.
- **Complexity in Demonstrating Social Gain:** Without specific quotas, stations will struggle to demonstrate their impact in measurable ways, requiring more complex and nuanced reporting systems.

3.1   Vagueness and Lack of Clarity
- **Ambiguity in New Requirements:** The proposed shift from specific quotas to broader qualitative assessments will introduce ambiguity, making it difficult for stations to understand and meet Ofcom's expectations.

- **Unclear Standards:** Participants worry about the lack of clear standards and guidelines for what constitutes adequate service to the community, potentially leading to inconsistent enforcement and interpretation by Ofcom.

3.2   Potential for Increased Complaints and Investigations

- **Vexatious Complaints:** The current system allows for complaints based on minor infractions. Deregulation will lead to an increase in such complaints due to the subjective nature of qualitative assessments.

- **Increased Scrutiny:** With fewer specific benchmarks, stations will face greater scrutiny and more frequent investigations into their operations, which will be resource-intensive and disruptive.

3.3   Impact on Smaller Stations

- **Resource Limitations:** Smaller stations, often run by volunteers, will find it particularly challenging to navigate and comply with new, less defined regulatory requirements, diverting their limited resources away from core activities.

- **Administrative Overhead:** The administrative overhead associated with proving compliance without clear guidelines will be disproportionately burdensome for smaller stations.

3.4   Risk of Diluting Community Focus

- **Maintaining Local Relevance:** Participants highlighted the risk that removing quotas for locally produced content will lead stations to deviate from their community focus, making it harder to maintain local relevance.

- **Shift Towards Commercialisation:** There is a fear that deregulation will push stations towards more commercially viable content at the expense of community-specific programming.

3.5   Concerns Over Funding and Support

- **Financial Constraints:** The lack of specific commitments will affect funding opportunities, as demonstrating tangible social gain becomes more challenging. This will impact the stations' ability to secure grants and sponsorships that are often contingent on clear community impact metrics.

- **Need for Additional Support:** Participants stressed the need for increased financial and administrative support to help stations meet their commitments under the new framework.

3.6   Balancing Flexibility and Accountability

- **Operational Freedom vs. Oversight:** While the flexibility offered by deregulation is appreciated, there is a significant concern about maintaining accountability and ensuring stations still provide meaningful social gain and community benefits.

- **Potential for Reduced Standards:** There is a concern that without strict regulatory oversight, some stations will not maintain the high standards of community service that justify their existence and public support.

3.7 Recommendations to Address Concerns

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Clear Guidelines and Standards:** Adopt and promote clear and detailed guidelines to help stations understand the new requirements and how to demonstrate compliance effectively.

- **Streamlined Reporting Processes:** Any changes to the reporting processes to reduce administrative burdens, need to be tested in practice, particularly for smaller stations.

- **Enhanced Support and Training:** Provide additional support for training and organisation development to help stations adapt to the new framework and effectively demonstrate their social impact using evaluation models and frameworks comparable with other community, civic and social reporting.

- **Regular Consultation and Feedback Mechanisms:** Establish ongoing consultation and feedback mechanisms to ensure that the regulatory framework evolves in a way that continues to support the unique role of community radio.

By addressing these regulatory burden concerns, it is our belief that any will be possible to move towards a more balanced approach to key commitments reporting that retains the core principles of community radio while allowing for operational flexibility and innovation.

4 Revenue Generation Limitations

Participants in the consultation sessions raised several concerns related to financial constraints in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential financial challenges that will arise from the proposed deregulation and the impact on the sustainability of community radio stations.

- **Advertising and Sponsorship Caps:** Current restrictions on revenue from advertising and sponsorship (e.g., the £15,000 base amount plus up to 50% of additional income) are seen as limiting. Participants fear that without these caps, however, that many stations will struggle to generate sufficient revenue while maintaining their non-commercial character.

- **Commercialisation Risks:** While relaxing these restrictions will provide more income opportunities, there is concern that this will lead to the commercialisation of community radio, undermining its community-focused mission.

4.1 Funding Challenges

- **Dependence on Grants:** Many community radio stations rely heavily on grants and public funding. There is concern that changes to the Key Commitments will make it harder to justify and secure these funds if the social gain is not clearly demonstrated.

- **Financial Instability:** Smaller stations will face financial instability if they are unable to meet new, less defined criteria that funders look for in assessing impact and value.

4.2 Administrative Costs

- **Increased Reporting Burden:** Although the proposed changes aim to reduce regulatory burdens, participants worry that demonstrating compliance through qualitative measures will be more administratively costly than meeting specific quotas.

- **Resource Allocation:** The need to invest in new systems and processes to track and report qualitative data will divert resources from core broadcasting activities. Ofcom's data management systems are themselves outdated and do not enable real-time analysis.

4.3 Impact on Volunteer-Run Stations

- **Volunteer Management:** Stations that rely on volunteers will struggle to manage the additional administrative workload required to comply with new reporting standards, potentially leading to burnout and volunteer attrition.

- **Operational Costs:** With limited financial resources, volunteer-run stations will find it challenging to cover the operational costs associated with increased administrative demands.

4.4 Long-Term Financial Planning

- **Uncertainty in Licensing Extensions:** The uncertainty regarding the future of analogue licences and the terms of their extensions creates challenges for long-term financial planning and investment.

- **Digital Transition Costs:** As the industry moves towards digital platforms, the costs associated with this transition will be prohibitive for many community radio stations, particularly without clear and supportive regulatory guidance. No assessment of Small-Scale DAB has yet been undertaken to establish any benchmark criteria for digital transition.

4.5 Potential Loss of Social Gain Funding

- **Qualitative vs. Quantitative Metrics:** Funders often require clear, quantifiable evidence of social gain. The move towards qualitative metrics will make it harder to meet these funding criteria, resulting in reduced financial support.

- **Demonstrating Impact:** The lack of clear, measurable outputs will undermine stations' ability to convincingly demonstrate their impact and secure necessary funding.

4.6 Recommendations to Address Financial Constraints

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintaining Financial Caps:** Maintain the financial caps to prevent unwarranted commercialisation while allowing for modest increases in revenue generation opportunities.

- **Enhanced Funding Support:** Increase funding and grant opportunities specifically tailored to community radio stations to help them transition to new reporting requirements.

- **Simplified Reporting Processes:** Update Ofcom's reporting and data management infrastructure, to provide a streamlined reporting processes that minimise administrative costs while effectively capturing qualitative social gain metrics.

- **Support for Digital Transition:** Provide additional financial and technical support for stations transitioning to digital platforms to ensure they will remain viable and competitive.

- **Clear Guidance and Training:** Providing clear guidance and training for stations on how to meet new qualitative reporting standards without incurring excessive costs.

- **Long-Term Licensing Clarity:** Set out clear policies on the extension of analogue licences to enable better long-term social gain and financial planning and stability.

By addressing these financial constraints, it is our belief that it will be possible to move towards a regulatory framework that balances the need for flexibility and innovation with the financial sustainability and community-focused mission of analogue community radio stations.

5 Erosion of Localism

Participants in the consultation sessions expressed several concerns related to the erosion of localism in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns emphasise the potential negative impact on the local focus and community engagement that are central to the mission of community radio stations.

5.1 Loss of Local Content

- **Reduction in Locally Produced Content:** Participants worry that removing quotas for locally produced content will lead to a significant reduction in local programming that addresses specific community interests and issues.

- **Diminished Local Relevance:** Without clear requirements for local content, stations will drift towards more generic programming, losing the unique local relevance that distinguishes community radio from commercial broadcasters.

5.2 Impact on Representation of Local Voices

- **Underrepresentation of Local Communities:** Deregulation will lead to fewer opportunities for local voices to be heard, particularly those from marginalised or underrepresented groups. The current commitments ensure that these voices have a recognised platform.

- **Erosion of Community Identity:** Local programming is crucial for fostering a sense of community identity and belonging. Participants fear that a reduction in locally focused content

will weaken community cohesion and engagement. The Media Act 2024, and the BBC's changes to local radio in England, have removed many local service obligations.

5.3 Accountability and Engagement

- **Weakened Community Accountability:** Clear, specific commitments ensure that stations remain accountable to their local or representative communities. The proposed changes will reduce this accountability, making it harder for communities to hold stations to account for their content and engagement efforts.

- **Reduced Community Participation:** Localism commitments encourage community involvement in station activities, including content production and governance. Deregulation will lead to less community participation, weakening the station's ties to its audience.

5.4 Impact on Local News and Information

- **Decline in Local News Coverage:** Participants highlighted the importance of community radio in providing local news and information that is not covered by larger, national media outlets. Removing local content requirements will result in a decline in this vital service.

- **Misinformation and Trust:** Local news provided by community radio stations is often trusted by the community. A shift away from local content will reduce the station's role in countering misinformation and providing reliable local information.

5.5 Risk of Homogenisation

- **Homogenised Programming:** There is a concern that without specific local content requirements, stations will opt for more homogenised, mainstream content that is easier to produce but less reflective of local needs and interests.

- **Loss of Diversity:** The diversity of programming, reflecting the unique characteristics of different communities, will be lost, leading to a more uniform and less vibrant media landscape.

5.6 Challenges in Measuring Local Impact

- **Difficulty in Assessing Local Engagement:** Qualitative metrics for social gain will not adequately capture the local impact of community radio stations, making it harder to demonstrate the benefits of localism in the absence of specific content quotas.

- **Subjective Evaluations:** The move towards more qualitative assessments will result in subjective evaluations of a station's local engagement, leading to inconsistent enforcement and potential disputes.

5.7 Recommendations to Address Concerns about Erosion of Localism:

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintain Local Content Requirements:** Retain some form of local content quotas to ensure stations continue to provide programming that is relevant and reflective of their local communities.

- **Enhanced Support for Local Content Production:** Providing additional resources and support for stations to produce high-quality local content, including training and funding opportunities.

- **Clear Guidelines for Qualitative Assessments:** Developing clear and detailed guidelines for how qualitative assessments of local engagement and social gain should be conducted to ensure consistency and fairness.

- **Community Feedback Mechanisms:** Implement a robust mechanism for gathering and responding to community feedback to ensure that stations remain responsive to local needs and concerns.

- **Recognition of Localism in Licensing and Funding:** Recognise the importance of localism in both licensing decisions and funding allocations to support stations that demonstrate a strong commitment to serving their local communities.

By addressing these concerns, it will be possible to move towards a balanced approach to Key Commitments reporting that preserves the essential local focus of community radio while allowing for some flexibility in how stations meet their commitments. This approach will help ensure that community radio continues to serve as a vital resource for local information, representation, and engagement.

6   Homogenisation of Content

Participants in the consultation sessions raised several concerns regarding the potential homogenisation of content because of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns reflect the fear that deregulation will lead to less diverse and less locally relevant programming, undermining the unique role of community radio.

6.1   Loss of Unique Local Programming

- **Generic Content:** There is a concern that without specific requirements for local content, stations will opt for more generic programming that does not cater to the unique interests and needs of their local communities.

- **Reduction in Local and Cultural Programming:** The removal of quotas for locally produced content will lead to a decrease in programming that highlights local culture, history, and issues, which are crucial for community identity.

6.2   Impact on Community Representation

- **Marginalised Voices:** Participants fear that deregulation will lead to a decrease in programming that gives voice to marginalised and underrepresented groups. Community radio plays a critical role in providing these groups with a platform that mainstream media often overlooks.

- **Diverse Perspectives:** The current framework ensures a variety of perspectives and content types, reflecting the diversity of the community. Changes will lead to a more homogenised media landscape, lacking this rich diversity.

6.3   Risk of Commercialisation

- **Commercial Pressures:** Stations will feel pressured to produce content that is more commercially viable rather than content that serves their community's specific needs and interests. This shift will lead to programming that is more homogeneous and less reflective of community values.

- **Profit Over Public Service:** The move towards potentially more profitable content will undermine the public service ethos of community radio, prioritising entertainment over education, information, and community engagement.

6.4   Decreased Variety in Music and Speech Content

- **Niche Genres and Topics:** Community radio stations often play niche music genres and cover topics not typically found on commercial radio. Deregulation will result in a shift towards more mainstream music and topics to attract a broader audience, reducing content variety.

- **Specialised Programming:** The current commitments ensure that stations provide specialised programming that meets the specific tastes and interests of their audience. Without these commitments, the range of content will narrow significantly.

6.5   Impact on Local News and Information

- **Reduction in Local News:** Participants expressed concern that the removal of specific local content requirements will lead to a decline in local news and information, which are vital for community awareness and engagement.

- **Less Community-Specific Information:** The unique information needs of the community, such as local events, public services, and community issues, will be neglected in favour of more general content.

6.6   Accountability and Quality Control

- **Measuring Impact:** Without clear content requirements, it will be challenging to measure the impact and quality of the content provided by community radio stations. This lack of accountability will lead to a decrease in content quality and relevance.

- **Consistent Standards:** The current framework provides consistent standards for content, ensuring a baseline quality and relevance. Deregulation will lead to inconsistencies and a decline in overall content quality.

6.7 Recommendations to Address Concerns about Homogenisation of Content:

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Retain Specific Content Requirements:** Maintain specific quotas for local and diverse content to ensure stations continue to provide unique and varied programming.

- **Support for Niche and Local Content:** Provide additional resources and support for stations to produce high-quality niche and local content, including training and funding.

- **Clear Guidelines for Content Diversity:** Develop clear guidelines to ensure that even with increased flexibility, stations must demonstrate a commitment to diverse and locally relevant content.

- **Enhanced Monitoring and Accountability:** Provide robust monitoring and accountability mechanisms to ensure stations adhere to content diversity standards without overly rigid quotas.

- **Community Feedback Mechanisms:** Implement a feedback system to continuously gauge community needs and preferences, ensuring content remains relevant and diverse.

- **Promote Public Service Ethos:** Emphasise the importance of the public service ethos of community radio, focusing on education, information, and community engagement over commercial considerations.

By addressing these concerns, it is our belief that it would be possible to move towards a balanced regulatory approach that prevents the homogenisation of content while still allowing stations the flexibility to innovate and adapt. This approach will help ensure that community radio continues to offer diverse, locally relevant, and high-quality programming.

7 Accountability and Standards

Participants in the consultation sessions raised several concerns relating to accountability and standards in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential negative impacts on the ability to maintain high standards and ensure accountability within community radio.

7.1 Loss of Clear Standards and Expectations

- **Ambiguity in Requirements:** The shift from specific quotas to broader, qualitative metrics will lead to ambiguity in what is expected of community radio stations. This lack of clarity will make it difficult for stations to understand and meet their obligations.

- **Inconsistent Implementation:** Without clear, measurable standards, there is a risk of inconsistent implementation and enforcement by Ofcom, which will lead to disparities in how different stations are assessed and held accountable.

7.2   Challenges in Measuring Social Gain

- **Quantitative vs. Qualitative Metrics:** The move away from quantitative metrics (e.g., specific hours of programming) to qualitative assessments of social gain will make it harder to measure and demonstrate the impact of community radio stations. Participants expressed concern that qualitative metrics are inherently more subjective and harder to standardise.

- **Proof of Impact:** Stations will find it challenging to provide concrete evidence of their social gain contributions, leading to difficulties in justifying their continued support and funding.

7.3   Potential for Reduced Accountability

- **Weakened Oversight:** The removal of specific content and engagement requirements will weaken oversight and reduce the ability of Ofcom to hold stations accountable for delivering meaningful community services.

- **Compliance Challenges:** Stations will struggle to demonstrate compliance with more generalised, less prescriptive requirements, potentially leading to reduced adherence to the core principles of community radio.

7.4   Risk of Eroding Community Trust

- **Transparency Issues:** Participants highlighted the importance of transparency in how stations meet their commitments. The lack of specific reporting requirements will reduce transparency and erode community trust in the station's commitment to serving local needs.

- **Community Involvement:** Clear standards and accountability mechanisms are essential for ensuring community involvement and feedback. Without these, stations will become less responsive to the needs and concerns of their listeners.

7.5   Administrative Burdens

- **Increased Complexity:** While the proposed changes aim to reduce administrative burdens, the lack of clear standards will increase complexity in reporting and demonstrating compliance, requiring more detailed and nuanced documentation.

- **Resource Allocation:** Smaller stations will find it challenging to allocate the necessary resources to navigate and comply with less defined regulatory requirements.

7.6   Impact on Funding and Support

- **Funding Criteria:** Many funding bodies require clear evidence of impact and compliance with regulatory standards. The shift to qualitative metrics will complicate funding applications and reduce the ability of stations to secure financial support.

- **Justifying Social Value:** Stations will need to find new ways to justify their social value and community impact without the backing of clear, quantitative metrics.

7.7   Recommendations to Address Concerns about Accountability and Standards:

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintain Clear Standards: R**etain clear, specific standards and expectations for content and community engagement to ensure consistent accountability and high performance.
- **Hybrid Reporting Approach:** Adopt a hybrid approach that combines both quantitative and qualitative metrics to capture the full scope of a station's impact while maintaining measurable standards.
- **Enhanced Guidance and Support:** Provide detailed guidance and support to help stations understand and meet new requirements, including training and resources for effective qualitative reporting.
- **Robust Monitoring Mechanisms:** Implement a robust monitoring and evaluation mechanisms to ensure ongoing compliance and accountability, including regular reviews and community feedback systems.
- **Transparency in Reporting:** Ensure transparency in how stations report their activities and impact, ensuring that community members will easily access and understand this information.
- **Community Involvement in Oversight:** Involve community members in the oversight and evaluation process to maintain trust and ensure that stations remain responsive to local needs and concerns.
- **Support for Smaller Stations:** Provide additional support for smaller stations to help them navigate the complexities of the new reporting framework and maintain high standards.

By addressing these concerns, it will be possible to move towards a regulatory framework that ensures accountability and maintains high standards while providing the flexibility needed for community radio stations to innovate and adapt to changing community needs.

8   Community Engagement

Participants in the consultation sessions raised several concerns related to community engagement in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential negative impacts on the ability of community radio stations to effectively engage with their local communities and maintain their role as a vital community resource.

8.1   Reduction in Community Involvement

- **Decreased Volunteer Participation:** Specific commitments help ensure active volunteer involvement. The removal of these commitments will lead to a decline in volunteer engagement, which is crucial for the operation and community integration of many stations.

- **Diminished Community Roles:** The absence of clear requirements for community participation in station activities (e.g., content creation, management) will reduce the opportunities for community members to take on meaningful roles within the station.

8.2   Loss of Local Relevance

- **Content Detachment from Community Needs:** Without specific local content requirements, stations will produce content that is less relevant to the immediate needs and interests of their communities, reducing their effectiveness in addressing local issues and concerns.

- **Weakened Community Connections:** Local content quotas help ensure that stations remain connected to their communities. The proposed changes will weaken these connections, making stations less responsive and relevant to local audiences.

8.3   Impact on Marginalised Voices

- **Underrepresentation:** Clear commitments ensure that marginalised and underrepresented groups have a platform to voice their concerns and share their stories. Deregulation will lead to these voices being overshadowed by more commercially viable content.

- **Diverse Perspectives:** The current framework supports a diversity of perspectives and content types. Changes will result in a loss of programming that reflects the experiences and needs of diverse community members.

8.4   Challenges in Demonstrating Social Gain

- **Measuring Community Impact:** The shift from quantitative to qualitative metrics for social gain will make it more challenging for stations to demonstrate their community impact. This will affect the ability to secure funding and support from stakeholders who rely on clear evidence of community engagement.

- **Subjectivity of Qualitative Metrics:** Qualitative assessments are inherently more subjective, which will lead to inconsistencies in how community engagement is evaluated and reported.

8.5   Reduced Accountability and Transparency

- **Transparency in Engagement:** Specific commitments provide a clear framework for stations to report on their community engagement activities. The lack of detailed reporting requirements will reduce transparency, making it harder for communities to hold stations accountable.

- **Maintaining Trust:** Trust between the station and its community is built through transparent and consistent engagement. The proposed changes will undermine this trust if stations are perceived to be less accountable.

8.6   Risk of Commercialisation

- **Focus Shift to Commercial Content:** Stations will prioritise commercially attractive content over community-focused programming to remain financially viable, leading to reduced community engagement.

- **Loss of Non-Profit Ethos:** Community radio's non-profit ethos, which emphasises social gain and community service, will be compromised if stations become too focused on commercial viability.

8.7   Recommendations to Address Concerns about Community Engagement

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintain Clear Community Engagement Requirements:** Retain specific commitments that ensure active community involvement in station activities and decision-making processes.

- **Hybrid Reporting Approach:** Commit to an approach that combines quantitative metrics with qualitative assessments to capture the full scope of community engagement while maintaining accountability.

- **Enhanced Support for Community Engagement:** Provide additional resources and support to help stations develop and sustain effective community engagement strategies, including training and funding opportunities.

- **Regular Community Feedback Mechanisms:** Implement a robust feedback system that allow community members to provide input on station activities and programming, ensuring stations remain responsive to local needs.

- **Transparent Reporting:** Require transparency in reporting community engagement activities, making this information readily accessible to the public to maintain trust and accountability.

- **Involving Community in Oversight:** Involve community representatives in the oversight and evaluation process to ensure that stations continue to prioritise community needs and interests.

- **Supporting Marginalised Groups:** Guarantee specific commitments to ensure that marginalised and underrepresented groups continue to have a platform and are actively involved in station activities.

- **Promoting the Non-Profit Ethos:** Maintain the non-profit ethos of community radio, focusing on social gain and community service rather than commercial interests.

By addressing these concerns, it is our belief that any regulatory framework that preserves the essential role of community radio in engaging and serving local communities, ensuring that these stations remain vital, trusted, and relevant community resources.

9 Training and Development

Participants in the consultation sessions expressed several concerns related to training and development in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential negative impacts on the ability of community radio stations to provide effective training and development opportunities, which are crucial for community capacity building and skills development.

9.1 Reduction in Structured Training Programs

- **Training Commitments:** Specific commitments ensure that stations provide structured training programs for volunteers and community members. The removal of these commitments will lead to a decline in formal training opportunities.

- **Skills Development:** Participants worry that without mandated training requirements, stations will not prioritise the development of skills among their volunteers and community members, leading to a gap in capacity building.

9.2 Impact on Volunteer Engagement

- **Volunteer Recruitment and Retention:** Clear training commitments help attract and retain volunteers by offering them valuable skills development opportunities. Deregulation will reduce the appeal of volunteering at community radio stations if training opportunities diminish.

- **Quality of Volunteer Work:** Effective training ensures that volunteers are well-prepared to contribute meaningfully to station operations. Without specific training commitments, the quality of volunteer work will suffer, impacting the overall effectiveness of the station.

9.3 Support for Marginalised Groups

- **Inclusion and Accessibility:** Training programs often focus on including marginalised and underrepresented groups, providing them with skills and opportunities they will not otherwise have. The removal of these commitments will reduce access to training for these groups.

- **Empowerment through Skills:** Community radio training programs empower individuals by providing them with media skills and confidence. A reduction in these programs will diminish the empowerment and personal development of community members.

9.4 Maintaining High Standards

- **Consistency in Training Quality:** Specific commitments ensure a consistent standard of training across different stations. Deregulation will lead to variability in training quality, affecting the overall standard of community radio operations.

- **Accredited Training:** Some stations offer accredited training programs that are recognised by external bodies. Without clear commitments, the availability and quality of accredited training will decline.

9.5   Funding and Resources for Training

- **Resource Allocation:** Participants expressed concern that without specific training commitments, stations will allocate fewer resources to training and development, prioritising other areas instead.

- **Funding for Training Programs:** Clear training commitments will help stations secure funding specifically for training programs. The removal of these commitments will make it harder to justify and secure such funding.

9.6   Long-term Sustainability of Community Radio

- **Building Future Leaders:** Training programs are essential for developing the next generation of community radio leaders and managers. Without these programs, the long-term sustainability and leadership of community radio will be at risk.

- **Adapting to Technological Changes:** Ongoing training is crucial for helping community radio stations adapt to technological changes and new media landscapes. Deregulation will reduce the emphasis on continuous professional development.

9.7   Recommendations to Address Concerns about Training and Development:

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintain Training Commitments:** Retain specific commitments that ensure stations provide structured and consistent training programs for volunteers and community members.

- **Support for Accredited Training:** Support stations in offering accredited training programs that provide recognised qualifications and enhance the value of community radio training.

- **Enhanced Funding for Training Programs:** Increase funding opportunities specifically for training and development programs to ensure stations have the resources needed to continue offering high-quality training.

- **Regular Monitoring of Training Quality:** Establish monitoring mechanisms that ensure that training programs maintain high standards and effectively meet the needs of volunteers and community members.

- **Focus on Inclusion and Accessibility:** Make training programs accessible to marginalised and underrepresented groups, ensuring these groups continue to benefit from community radio training opportunities.

- **Continuous Professional Development:** Focus on continuous professional development to help volunteers and staff adapt to technological changes and new media landscapes.

- **Community Feedback on Training Needs:** Invest in systems for gathering feedback from volunteers and community members on their training needs and experiences to continuously improve training programs.

- **Showcasing Training Success Stories:** Promote examples of successful training programs and the positive impact they have had on individuals and communities to demonstrate the value of maintaining strong training commitments.

By addressing these concerns, it is our belief that any regulatory framework that supports robust training and development programs, ensuring that community radio stations continue to build capacity, empower individuals, and maintain high operational standards.

10   Underrepresented Voices

Participants in the consultation sessions raised several concerns related to the representation of underrepresented voices in the context of the proposed changes to Key Commitments reporting for Analogue Community Radio stations by Ofcom. These concerns highlight the potential negative impacts on the ability of community radio stations to provide a platform for marginalised and underrepresented groups.

10.1   Loss of Focus on Underrepresented Groups

- **Commitments to Marginalised Communities:** Specific commitments ensure that community radio stations actively focus on providing a platform for marginalised and underrepresented groups. The removal of these commitments will lead to a reduction in programming and initiatives aimed at these groups.

- **Decreased Representation:** Without clear mandates, there is a risk that stations will not prioritise the voices and stories of underrepresented communities, leading to decreased visibility and representation.

10.2   Impact on Diversity of Content

- **Variety of Perspectives:** Participants expressed concern that deregulation will lead to a homogenisation of content, with fewer diverse perspectives being represented. This will reduce the richness and variety of programming that community radio currently offers.

- **Cultural and Ethnic Representation:** The current framework helps ensure that cultural and ethnic minority groups have a voice on community radio. Deregulation will result in less content that reflects the diversity of the local community.

10.3   Accountability to the Community

- **Ensuring Commitment:** Specific commitments hold stations accountable to their promise of serving underrepresented groups. Removing these commitments will make it harder for communities to ensure that stations are fulfilling this critical role.

- **Transparency:** Clear requirements for representing underrepresented voices provide transparency about how well stations are serving their entire community. Deregulation will reduce this transparency and make it more difficult to hold stations accountable.

10.4 Support for Community Initiatives

- **Community Projects and Initiatives:** Specific commitments often support community-driven projects and initiatives that focus on marginalised groups. Without these commitments, such initiatives will receive less attention and support from stations.

- **Volunteer Engagement:** Participants highlighted that clear commitments encourage the engagement of volunteers from underrepresented communities. Deregulation will lead to a decline in volunteer opportunities and engagement for these groups.

10.5 Funding and Resources for Inclusive Programming

- **Resource Allocation:** Stations will allocate fewer resources to programming for underrepresented groups if specific commitments are removed. This will result in a decrease in the quality and quantity of inclusive programming.

- **Securing Funding:** Clear commitments to serving underrepresented voices will help stations secure funding and grants aimed at supporting diversity and inclusion. Deregulation will make it harder to justify and obtain such funding.

10.6 Long-term Impact on Social Cohesion

- **Community Integration:** Community radio plays a crucial role in integrating diverse groups within the community by providing a platform for dialogue and understanding. The proposed changes will weaken this role and impact social cohesion.

- **Empowerment and Advocacy:** By giving a voice to underrepresented groups, community radio empowers individuals and communities to advocate for their needs and rights. Deregulation will reduce the station's ability to perform this advocacy role.

10.7 Addressing Concerns about Representation of Underrepresented Voices

Based on the feedback received during our consultation and engagement process, it is recommended that Ofcom seeks to support improved management and development of community radio station practices, such as:

- **Maintain Specific Commitments: R**etain specific commitments that ensure community radio stations actively focus on providing a platform for underrepresented and marginalised groups.

- **Enhanced Support for Inclusive Programming:** Provide additional resources and support for stations to develop and sustain high-quality programming that reflects the diversity of the community.

- **Clear Guidelines for Diversity and Inclusion:** Develop clear guidelines to ensure that stations remain committed to diversity and inclusion, even with increased flexibility in other areas.

- **Monitoring and Accountability Mechanisms:** Provide robust monitoring and accountability mechanisms to ensure that stations continue to prioritise and effectively serve underrepresented voices.

- **Community Feedback Systems:** Specify feedback systems that allow underrepresented communities to voice their needs and concerns, ensuring stations remain responsive to their audiences.

- **Support for Community-Driven Initiatives:** Promote the importance of supporting community-driven projects and initiatives that focus on marginalised groups, ensuring these remain a priority for stations.

- **Promote Volunteer Engagement:** Reward stations that continue engaging volunteers from underrepresented communities, providing them with meaningful opportunities to contribute.

- **Showcasing Success Stories:** Promote successful examples of community radio stations effectively serving underrepresented groups to demonstrate the value and importance of maintaining strong commitments to diversity and inclusion.

By addressing these concerns, it is our belief that any regulatory framework employed by Ofcom must ensures community radio stations continue to provide a vital platform for underrepresented voices, maintaining their role in promoting diversity, inclusion, and social cohesion.

11   References