

Response to Ofcom's Community Radio Key Commitments Consultation 2024

From GTFM (South Wales) Ltd

Question 1: Do you agree with Ofcom's proposal to remove specific music genre requirements from Key Commitments (other than where music is a core element of the character of the service)? Please provide further information and/or evidence in support of your response.

Answer 1: Yes we agree with this proposal in principle for the reasons you outline, though perhaps an overall description of music policy could always be included in the Character of Service instead in order to protect listeners to long established stations from any sudden or wholesale changes which might result (say) from a change in manager or Trustees, while at the same time avoiding specifics which could prevent reasonable evolution over time.

For example GTFM's music output might currently be summarised as "a broad mix of popular music styles from the 1960's to the present day during daytime, supplemented by specialist music output during evenings and at weekends. Plus an appropriate amount of music performed in the Welsh language".

Question 2: Do you agree with Ofcom's proposal to remove specific speech content requirements from Key Commitments (other than where particular speech content is a core element of the character of service)? Please provide further information and/or evidence in support of your response.

Answer 2: Yes, provided speech 'basics' such as local news and information are included in the Character of Service.

And should it be a requirement to include an 'appropriate' amount of Welsh language content in the output of Welsh Community stations? The description 'appropriate' is deliberately broad to give stations plenty of room to manoeuvre, not least because the number of Welsh speakers recorded in Census data varies widely in different parts of the country.

For example in GTFM's Rhondda Cynon Taf County catchment area around one fifth of residents claim to understand Welsh sufficiently to declare it on their Census form, while virtually all understand and speak English. Currently we broadcast a total of five hours of dedicated music based all Welsh language evening output per week (Tuesday 7-10pm and Sunday 8-10pm). We also relay a Welsh language news bulletin from Radio Cymru live at 3pm on weekdays by agreement with the BBC.

Question 3: Do you agree with Ofcom's proposal to remove original output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.

Question 4: Do you agree with Ofcom's proposal to remove locally produced output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.

Answers 3 & 4 Broadly yes, for the logical reasons you outline, assuming the Character of Service contains some kind of requirement to produce original output locally.

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.

Answer 5: Yes. In GTFM's area, which comprises a significant part of the former coal/mineral mining areas in the South Wales valleys, Welsh is the only significant minority language worthy of being noted in the Character of Service, though the station would welcome being free to include other languages occasionally when appropriate, for example for Ukranian, Polish or South Asians groups resident in its area.

Question 6: Do you agree with Ofcom's proposed approach to standardising wording (where appropriate) in the character of service descriptions for community radio stations? Please provide further information and/or evidence in support of your response.

Answer 6: Yes.

Question 7: Do you agree with Ofcom's assessment of the impacts of its proposed changes (including potential impacts on specific groups of persons including equality impacts)? Please provide further information and/or evidence in support of your response.

We agree with Ofcom's reasoning here. It is certainly the case that Welsh community stations have had to cope with new issues which have emerged through/since the Covid pandemic and (especially) due to dramatic price rises for essential commodities which have resulted in the cost of living crisis. This has disproportionately affected relatively poor communities including many here in the South Wales Valleys.

During and following Covid, while we retained the vast majority of our (40 or so) volunteers, the availability of nearly all of them changed because most had been forced to change their 'day jobs', in turn affecting which duties they could carry out at the station. So we can readily understand how some stations might have problems meeting the over-detailed key commitment quota requirements you are seeking to abolish. But while over the past year or so we have seen an encouraging rise in the number of enquiries received from potential new volunteers, our basic ability to sustain our service has been challenged due to greatly escalated prices, especially energy price rises (our electricity bill for our studio centre now averages £500 a month instead of around £300 previously), while at the same time we have suffered a reduction in both advertising and charitable income.

And while we were expecting some of our smaller scale local advertisers to stop advertising because they can barely afford to open their shops, we weren't expecting our Welsh Government advertising (worth around £10,000 a year in a turnover of around £40,000) to dry up completely, apparently because they changed their media buying arrangements (presumably to save money). And while they have apologised and promised to 'fix' the 'problem', because they want to continue advertising on community radio (all of us in Wales are similarly affected) nothing has happened yet. In fact we have only received one advertising booking worth less than £300 since Easter *last year*

(2023)! Currently our local Senedd Members and the Creative Wales department in the Welsh Government are all trying to sort it out.

Question 8: Are there any impacts of these proposals which Ofcom has not recognised in this document?

Answer 8: None spring to mind.

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.

Answer 9: Given Ofcom is proposing not to alter existing Welsh Language requirements we'd have to agree its unlikely there would be any directly negative outcome.

Question 10: Do you think our proposal could 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?

Answer 10: We are sure your Cardiff office team can – and probably have – briefed you in depth about the overall issue of the Welsh Language.

It is certainly an established fact that some independent/commercial local radio stations in Wales, for example (the late) Swansea Sound, honoured a faithful commitment to delivering Welsh Language output from the outset (1974) until their final broadcasting day, often providing weekly hours of output in excess of statutory minimum percentage requirements laid down by the Independent Broadcasting Authority, despite it being far less 'fashionable' than today and Welsh activists were burning down holiday cottages (etc) as well as campaigning for a Welsh language TV channel, which eventually happened. And in 1977 the BBC launched Radio Wales and Radio Cymru.

But perhaps it can also be argued that some commercial radio broadcasters, past and present demonstrate an apparently almost complete disregard for the language - and in some cases appear not to recognise Wales is a separate country from England in a way they just wouldn't get away with in Scotland!

Despite the fact nearly everyone speaks or understands English, since the establishment of devolved Welsh government 25 years ago its become an officially bi-lingual country. Furthermore, when viewed close-up, in practice this actually means 'Welsh first' with that language appearing before English on official signs, Government and often local authority documents, even in the south where English is by far the dominant language in day to day use.

Meanwhile debates in the Senedd (Welsh Parliament) are genuinely bi-lingual with simultaneous headphone translation routinely available, popular landmarks are reverting back to their original Welsh names and new ventures (e.g. new buildings and road names) are also now only given Welsh language names.

Against this clearly changing background you'd have thought only King Canute could have missed clues as obvious as these, though some (but not all) commercial radio operators appear so far to have managed it!

Indeed it has been the experience of listeners in areas with significant numbers of first language Welsh speakers that past changes in station ownership have sometimes resulted in the partial or even complete removal of Welsh language output, leading the casual observer to assume statutory minimum Welsh language output quotas, originally established by the IBA, might have been abolished so the regulator was powerless to act, perhaps when commercial radio went through a very similar licence streamlining process to the one proposed here, in which 'Promises of Performance' were replaced by 'Formats'.

Given Welsh Senedd Members' frustration at having no regulatory influence at all over Welsh media outlets, Ofcom's role in this respect is crucial.

So rather than leave things as they are, if Ofcom has an overall brief to ensure the Welsh Language is represented across all media in Wales, it could reasonably review all non-BBC radio output in this respect, as it would be unfair for community radio – which still has no reliable means of financial support - to carry such a responsibility alone.

But while the purpose of this review is to reduce the administrative burden both for stations and Ofcom, it might still be reasonable to expect community stations in Wales which don't currently do so do to consider including the Welsh language, as appropriate to the type of service they offer and in consideration of the proportion of Welsh speakers in their broadcast area - not least because it is hard to imagine providing a full level of 'social gain' in 21st century Wales without considering such matters**

*** This document and the views expressed in it are largely those of Terry Mann, GTFM's Station Manager, who has over 50 years UK local broadcasting experience having originally come to Wales to help launch its first non-BBC local station 'Swansea Sound' in 1974, returning later to launch its sister station 'The Wave' 21 years later.*

Question 11: Do you agree with our proposed compliance principles?

Answer 11: Yes.

Question 12: Do you agree with Ofcom's proposed next steps for varying Key Commitments?

Answer 12: Yes

ENDS

GTFM/TM 13th June 2024