



# UK Community Radio Network

Forward from the UK Community Radio Network.

The UK Community Radio Network welcomes Ofcom's consultation into the future approach to key commitments. As part of our response to the recent DCMS consultation on the future of analogue Community Radio we raised concern over there being no review of the delivery and measurement of social gain and called on the DCMS for this to happen, how social gain is measured and regulated, which Ofcom managed in the form of key commitments. So on behalf of the sector we thank Ofcom for answering that call and running this consultation.

We especially welcome considerations that recognise not only the volunteer nature of Community Radio, but also the struggles the sector has faced since covid19 with recruiting and retaining good quality volunteers. We also welcome the broad approach to look at the quality of the delivery of social gain via the key commitments and not just quantity in some elements.

| Question   | Your response  |
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| <b>Question 1:</b> 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<br><br>Yes. A more streamlined approach would be welcome and acceptable, especially as Ofcom has raised about protecting those stations that hold genre requirements as part of proposed character of service. |

| Question  | Your response  |
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| <p><b>Question 2:</b> 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.</p> | <p>Confidential? – N</p> <p>Yes. We do support this approach, however, without greater detail of how the subjective quality of the delivery of social gain via speech content elements will be regulated there may be concern about what impact this could have on communities served by stations. Speech content, via the delivery of local news &amp; information, interviews &amp; discussions quite often can be what shows distinctiveness of Community Radio Stations vs ‘local’ commercial and ‘local’ BBC radio stations.</p>  |
| <p><b>Question 3:</b> 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.</p>         | <p>Confidential? – N</p> <p>Yes, in recent times it’s seemed problematic to effectively favour the quantity of output vs the quality of output to deliver social gain. The clarity provided in section 4.51 is helpful, however, more detail might be beneficial to make sure that communities are being safeguarded, and so that stations have a great understanding of what might be required to them. We feel Ofcom will need to do some engagement work with stakeholders and stations so that all parties can more greatly understand how Community Radio is going to be regulated by the quality of the outcome, and not quantity.</p>   |
| <p><b>Question 4:</b> 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.</p> | <p>Confidential? – N</p> <p>Yes, same response as above.</p> <p>However, we do feel that Ofcom do need to consider stations that have a more hybrid approach with volunteering, with the changes in modern technology enabling volunteers to broadcast or produce content of interest and relevance to the target community but not directly from the studios or the measured coverage area. We have found that this actually opens up opportunities for volunteering that might not be traditionally available, especially with stations in a more rural area and factoring in cost of living with transport, availability of hours of being able to volunteer vs studios availability of access.</p> <p>(This acknowledges the recent issues around volunteers producing material from the local area / geographical area or editorial area, but not technically covered by the measured coverage area).</p> |
| <p><b>Question 5:</b> Do you agree with Ofcom’s proposed approach to language requirements for community radio stations? Please provide further</p>   | <p>Confidential? –N</p>  |

| Question   | Your response  |
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| information and/or evidence in support of your response.   | Yes, we welcome the more streamlined approach to language requirements, but also the safeguarding where required within the character of service.  |
| <p><b>Question 6:</b> 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.</p> | <p>Confidential? – N</p> <p>Yes, we strongly welcome a more standardised approach to the language used in the character of service, this will enable greater transparency and understanding across the sector, and make our role as supporting stations, and developing and sharing best practices easier. Ofcom does need to make sure that language used is clear, but also to the detail and level required to safeguard the importance of Community Radio in delivery of social gain for their target community.</p>   |
| <p><b>Question 7:</b> 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.</p>   | <p>Confidential? – N</p> <p>Yes, we do agree with Ofcom’s assessment of the impacts of its proposed changes, while we are the sector-based organisation for Ofcom licenced Community Radio stations, we have actively encouraged stations to submit their own responses, and we do hope this consultation has received a wide level of responses from stations, and other representatives and voices from communities and listeners. If however there has been a low level of engagement across the wide and diverse nature of Community Radio stations OR low level of engagement of communities or other non radio representatives we would encourage Ofcom to do some additional impact assessment work to really project and ensure that this process has the best outcomes for communities and the delivery of social gain for those communities.</p> |
| <p><b>Question 8:</b> Are there any impacts of these proposals which Ofcom has not recognised in this document?</p>  | <p>Confidential? – N</p> <p>Yes, Ofcom has not considered this consultation and the following exercise as an opportunity to reflect and review characters of service for Community Radio stations. Especially Community Radio stations that serve geographical communities, Ofcom needs to be open to reviewing the coverage area, especially if the stations can demonstrate a need to increase or change it’s coverage area to respond to changes in it’s area, especially for older licences. This could include but not limited to changes in the political administration of areas (changes from DC’s to UC’s, merging of areas etc), population growth and developments in towns and villages (again including merging of areas), but also reflecting now underserved neighbouring communities from existing Community</p>                           |

| Question  | Your response   |
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|   | <p>Radio stations brought on by the merging of 'local' commercial radio stations into national or quasi-national brands and closures of local studios, and the recent changes to 'local' BBC which now means there is less local radio serving areas across the UK which do not currently have a Community Radio station that currently serves them. Especially being mindful of Ofcoms current policy of not issuing new analogue Community Radio licences.</p>  |
| <p><b>Question 9:</b> 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.</p>  | <p>Confidential? – N</p> <p>Yes, we welcome the proposals and Ofcoms commitment to protect and safeguard Welsh language.</p>  |
| <p><b>Question 10:</b> 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?</p> | <p>Confidential? – N</p> <p>No, the proposal works well.</p>  |
| <p><b>Question 11:</b> Do you agree with our proposed compliance principles?</p>  | <p>Confidential? – N</p> <p>Yes, although as mentioned above we believe that some additional clarity may be needed in some areas, and would welcome the opportunity to work with Ofcom to engage with Community Radio stations to support greater understanding and clarity and help develop and promote examples of best practice.</p> <p>In relation with point a) we would ask Ofcom to consider the assessment over the course of an average week, and not just one bespoke week, or take a single week in the round in comparison with other weeks or representations made by the station in question. Even removing the requirements of the measurement and regulation of the quantity of hours, still wouldn't make allowances for Community Radio stations having the occasional week that might not do as well as they would hope or for legitimate reasons may be different to what their normal average weeks broadcast in relation to the quality of social gain delivery. This could include the absence of volunteers for a week or more, bespoke weeks of programming (obit, Christmas, Ramadan or</p> |

| Question | Your response   |
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|          | other special occasions), or other events including and up to force majeure |

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