

Question	Your response
<p>Consultation question 1: Do you agree with our proposed administrative priorities framework? Please provide further information and/or evidence in support of your response.</p>	<p>On the whole, I agree that greater transparency is needed.</p> <p>I agree that dealing with complaints is often not a good use of either the stations or Ofcom’s time.</p>
<p>Consultation question 2: Do you agree with our proposal to share a summary of the issues raised with the broadcaster rather than the full text of the complaint apart from in exceptional circumstances? Please provide further information and/or evidence in support of your response.</p>	<p>On the whole this feels like a pragmatic and positive step, though please refer to my response to Q7 as well.</p>
<p>Consultation question 3: Do you agree with our proposal to not share the name of the complainant with the broadcaster, apart from in exceptional circumstances? Please provide further information and/or evidence in support of your response.</p>	<p>Yes</p>
<p>Consultation question 4: Do you agree with our proposal to no longer notify the complainant of the outcome of their complaint? Please provide further information and/or evidence in support of your response.</p>	<p>Yes</p>
<p>Consultation question 5: Do you agree with our proposal that complaints should be made within 20 working days of the broadcast of the relevant content? Please provide further information and/or evidence in support of your response.</p>	<p>Yes, this feels very sensible, and may help to avoid malicious complaints, where someone digs through previous broadcasts to find something to complain about.</p> <p>I am interested in what might come under a ‘specific case’ where the deadline is more flexible. I wonder how the experience might be for a complainant who has had multiple issues over a long time, for example, a member</p>

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	of an organisation who has not been treated fairly, and finally wishes to complain?
Consultation question 6: Do you have any comments on our proposed additional changes to the General Procedures?	Confidential? – Y / N
Consultation question 7: Do you agree with Ofcom’s assessment of the impacts of its proposed changes, set out in the sub-sections above (including potential impacts on specific groups of persons including equality impacts)? Please provide further information and/or evidence in support of your response.	<p>I am interested in section 3.40 about ‘broadcaster first’ approaches, as I am in favour of most matters being dealt with in-house, and passed to Ofcom if they can’t be resolved or in cases where the harm/breach of broadcast code is more severe.</p> <p>Complaints are a valuable opportunity to learn and grow, and CR stations should operate democratically and transparently and have a clear complaints procedure. This is an area Ofcom could advise CRs on.</p> <p>As well as complaints procedures, CRs need robust safeguarding, equal opportunities, health and safety policies etc. which Ofcom could request in the context of dealing with complaints.</p>
Consultation question 8: Are there any impacts of these proposals which Ofcom has not recognised in this document?	<p>It is interesting to see that these changes are largely concerned with key commitment compliance in Community Radio (CR), and I wonder if many are brought about by disgruntled members, who don’t feel supported or included? I am concerned that Ofcom’s approach is a bit like saying ‘let’s reduce crime by legalising burglary’ and does not tackle the problems at a systemic level. Better education and more funding is needed to promote best practice in CR.</p> <p>In line with the review at Ofsted in how they assess schools, I recommend that Ofcom work on building good relationships with licensees, and dealing with complaints in a compassionate manner.</p> <p>On-air output is just one element of Community Radio, and often reflects the qualities of the off-air relationships, and more focus on inclusion, learning, transparency within CR is often needed. Rather than punishing licence breaches, for example, through name-and-shame,</p>

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	<p>loss of licence or fines, Ofcom should make clear recommendations and, in severe cases, a time scale to make changes. These might include holding an AGM, or opening up to new volunteers from different demographics.</p> <p>What CR does not need is a decrease in quality, but recognition of its many strengths and its important role in a democratic society. The reduction in key commitment reporting, along with these proposed changes put the sector at risk of a loss of accountability. This needs to be built in other ways. Whereas I am generally in favour of these proposals, alone they will not solve the problems that CR faces, such as struggling finances, or struggling to recruit and train volunteers. In order for CR to fulfil its purpose more rigour is needed around accountability at a grassroots level, with leadership from Ofcom around what this looks like. For example, diverse boards, open days, clear policies, person-centred approaches to scheduling, and accessible studios.</p>
<p>Consultation 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.</p>	<p>I have no expertise regarding this.</p>
<p>Consultation 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?</p>	<p>I have no expertise regarding this.</p>
<p>Consultation question 8: Please tell us how you came across this consultation.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Email from Ofcom <input type="checkbox"/> Saw it on social media <input type="checkbox"/> Found it on Ofcom's website <input type="checkbox"/> Found it on another website <input type="checkbox"/> Heard about it on TV or radio <input type="checkbox"/> Read about it in a newspaper or magazine

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	<input type="checkbox"/> Heard about it at an event / <input type="checkbox"/> Other (please specify)

Please complete this form and return to broadcast.licensing@ofcom.org.uk. I have no expertise regarding this.