

UK Community Radio Network

| Question | Your response |
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| Consultation question 1: Do you agree with our proposed administrative priorities framework? Please provide further information and/or evidence in support of your response. | Yes - we agree now is an ideal opportunity to review the framework, especially in light of the changes to key commitments. It will be interesting to see what the delivery and regulation of the new approach to key commitments. Ofcom needs to find the right balance between supporting and allowing good community radio to happen, and holding stations (and their management) to account for failing to serve their community. A greater understanding of the needs of that community is required, and especially an understanding how communities can develop and evolve especially over a long licence period. |
| 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. | Yes - this seems a fair approach, however Ofcom does need to provide as much detail about the complaint as they can, often stations can receive quite vague detail which then means station have to expand a lot of resource (quite often voluntary) to provide details response to a vague issue. In addition it may be worth considering volunteer whistleblowers, as it's not clear if they are covered by your separate whistleblower policy, and with the number of volunteers in the community radio sector there needs to be support an allowances for those that might know first hand about stations who are not fulfilling their community radio licence and want a way for the station to be held to account without private or public retribution. |
| 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 | Yes - the rationale given by Ofcom is fair, there needs to be that balance between holding stations accountable for their community licence and in a way that doesn't produce a 'chilling' effect on people who want to speak out or raise concerns, and stations being able to understand the nature of the complaints. |

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| information and/or evidence in support of your response. | Ofcom also needs to be more pragmatic over possible vexatious complaints made that can impact stations resources to respond to. | |
| 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. | No - Quite often people feel like they want to know they have been heard. So even receiving a response that Ofcom has investigated and brief details can be enough to satisfy people. If people who complain receive no response they may feel they are not being heard and either continue to complain or escalate their complaints into other areas which would cause additional impact for community broadcasters, especially if the complaint is vexatious or outside the scope of Ofcoms remit. Of note the broadcast bulletin while a useful source of guidance and training for compliance can also be hard to navigate, and is also nearly almost impossible to use easily on a mobile device. | |
| 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. | Yes - The rationale makes sense, community stations are limited resources wise so it can be very impactful if they receive a complaint a long time after the issue or broadcast concerned, especially if Ofcom is then expecting the station to response quickly. | |
| Consultation question 6: Do you have any comments on our proposed additional changes to the General Procedures? | None | |
| 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. | Ofcom needs to make sure it has engaged with possible impacted groups more directly to make sure there will be no significant negative impact on specific groups, especially with consideration of access and equality. | |

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| Consultation question 8: Are there any impacts of these proposals which Ofcom has not recognised in this document? | Ofcom should set more realistic and supportive timetables and communications with broadcasters. | |
| | Requiring broadcasters to respond to complaints within 5 working days can be significantly stressful or resource intensive fo community radio stations, and Ofcom should extend this period to support often over worked staff (if they exist) or under resourced volunteer run stations. | |
| | Ofcom also needs to better communicate the process and progress of complaints, there should be a set timeframe established on the outset and stations should have to be waiting around for months for outcomes, or even find out their complaint has been dropped from the broadcast bulletin and not directly from Ofcom. | |
| | The impact on resources and for example the mental health and wellbeing for station staff and volunteers also needs to be considered with the timescales, communications, and impact of the complaints process. | |
| 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. | We agree with Ofcom's assessment of the impact of the proposals on the Welsh language. We feel it is right for Ofcom to be more accommodating and supportive of Welsh Language speakers and opportunities to use the language in communications. | |
| 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? | We agree with Ofcom's assessment of the impact of the proposals on the Welsh language. We feel it is right for Ofcom to be more accommodating and supportive of Welsh Language speakers and opportunities to use the language in communications. | |
| Consultation question 8: Please tell us how you came across this consultation. | X Email from Ofcom | |
| | □ Saw it on social media | |
| | Found it on Ofcom's website | |
| | Found it on another website | |

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| | | Heard about it on TV or radio |
| | | Read about it in a newspaper or magazine |
| | | Heard about it at an event |
| | | Somebody told me or shared it with me |
| | | Other (please specify) |

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