

BCI Policy on Community Radio Broadcasting

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Broadcasting Commission of Ireland
Coimisiún Craolacháin na hÉireann

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Introduction

This document is intended to inform interested parties nationally and internationally about BCI policy in relation to community and community of interest broadcasting in Ireland. The Irish experience has demonstrated that community stations can develop into a viable distinct strand in Irish broadcasting. However, it also shows that realising this potential requires a substantial level of ongoing commitment and support from relevant support agencies and the communities served by these stations.

In recognition of the particular challenges faced by the sector, the Commission provides support for a number of specific initiatives through the Community Radio Support Scheme¹. The scheme is focused on developing the community broadcasting sector nationally by supporting the operation of the Community Radio Forum², and locally by providing development support for licensed stations.

This document is divided into the following sections:

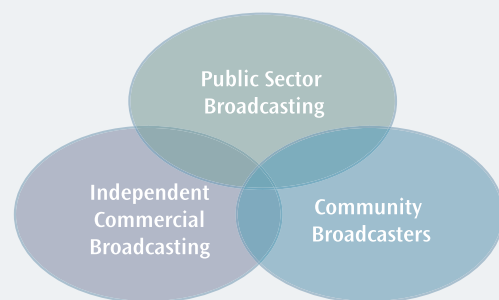
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¹ For more information on the Community Radio Support Scheme check the website of the Broadcasting Commission of Ireland www.bci.ie.

² The Community Radio Forum is the representative body for community radio stations in Ireland. All BCI licensed community stations are eligible for membership and the Forum also provides some development support for aspirant groups. Contact details are available from the BCI.

1 Defining Community Radio

The Commission defines Community Broadcasters as a distinct strand in Irish broadcasting. The other two strands being Independent Commercial Broadcasting and Public Sector Broadcasting. The relationship between these three broadcasting strands is illustrated in this diagram:



While stations can operate in the intersection between two or, indeed, all three of the strands, each station must fundamentally belong in one of them.

This idea of a distinct strand, constituted of community and voluntary organisations, is not unique to broadcasting or Ireland. There is a long history of voluntary social service activity nationally and internationally, especially in areas such as education and health. While the level of state provision in many countries has increased since the start of this century, the role played by voluntary organisations has not decreased proportionately. On the contrary, growing national and international concern about issues such as unemployment and poverty has resulted in a surge in community and voluntary activity over the past twenty years³. In Ireland, the development of the local partnership companies, the National Social and Economic Forum and the Community Development Programme⁴ indicates a greater recognition of the role played by community and voluntary organisations.

³ In 1994 the Institute for Policy Studies in Johns Hopkins University, Baltimore, USA published the results of a major international study on the role and scope of the non-profit sector in twelve countries across the world. The sample included the USA, UK, France, Germany, Italy, Hungary, Thailand, Japan, Brazil, Ghana, Egypt and India. The study concluded that "the non-profit sector now constitutes a powerful economic force in settings as diverse as highly centralised France and Japan and highly decentralised Germany and the United States. In the developing world and the former communist bloc as well, non-profit organisations are now being recognised as potent mechanisms for stimulating development and fostering civic involvement". (P97) *The Emerging Sector - An Overview*: Salamon and Anheier: Institute for Policy Studies Johns Hopkins University, Baltimore, USA.

⁴ The Community Development Programme (CDP) was established in 1990 in recognition of the role of community development in tackling poverty and disadvantage. The Programme provides a range of supports, development opportunities and services to community groups and individuals in their areas.

The Irish experience has shown that stations in the evolving community broadcasting strand have more in common with organisations in the community and voluntary sector than public or commercial broadcasting operators. The experiences of community and voluntary organisations, nationally and internationally, have proven to be a rich source of information and ideas for community broadcasters in Ireland. To provide greater clarity in relation to what makes community broadcasting unique the Commission has adopted the following definition of community radio in an Irish context:

"A community radio station is characterised by its ownership and programming and the community it is authorised to serve. It is owned and controlled by a not-for-profit organisation whose structure provides for membership, management, operation and programming primarily by members of the community at large. Its programming should be based on community access and should reflect the special interests and needs of the listenership it is licensed to serve."

Since the term community is central to this definition, a framework for assessing and monitoring the community nature of submissions from, and activities of, relevant groups is required. In 1994, the Commission adopted the AMARC Community Radio Charter for Europe⁵, as a statement of the objectives community stations should strive to achieve. The Irish experience has reinforced the relevance of this Charter for community broadcasters in Ireland. The BCI continues to use this Charter as a reference point when assessing submissions from, and the activities of, relevant groups. The Charter is attached as appendix one to this document.

In conjunction with the AMARC Charter, the Commission also uses the following three dimensional framework to assess the community nature of relevant organisations and groups. Stations included in the community broadcasting strand will be expected to:

- describe clearly the geographical community or community of interest served;
- promote and support active participation by this community at all levels in the operation;
- operate in a manner which is in keeping with the ethos or value system which underpins community activity.

⁵ AMARC is the World Association of Community Orientated Broadcasters founded in 1983. The European branch of AMARC, AMARC Europe, adopted this Charter in 1994 as a common statement of objectives member stations should strive to achieve. It is included in all community stations' contracts.

2 The Licensing Process for Community Radio

Section 5 of the Radio and Television Act 1988 sets down the following procedures which the BCI is bound to follow when allocating licences under this Act:

- 1 Invite expressions of interest from parties interested in securing contracts for sound broadcasting services by public notice in at least one national newspaper;
- 2 Invite applications by public notice for a contract to provide a service in a specific area as approved by the Commission for Communications Regulation (formerly ODTR).

As part of the decision-making process certain selected applicants may also be invited to make an oral presentation to the Commission before a decision is taken. While this is not a requirement under the 1988 Act, it affords an applicant an opportunity to present its case for a licence to the Commission and, in turn, allows the Commission to question the applicant on the submission in more detail.

As outlined in Section 5 of the Radio and Television Act 1988, expressions of interest are expected to indicate in general terms the type of service that will be provided and are not regarded as an application for a sound broadcasting contract. In considering expressions from those interested in community strand licences, the Commission will have regard to the definition of community radio outlined in section one of this document and the community nature of the relevant group. Expressions of interest for community licences should, therefore, include a clear definition of the community to be served and outline the level of current and expected participation by that community in the station. Groups should also comment on the type of programming service envisaged, how it will meet the communication needs of the community served, and how they propose to resource their station.

Following consideration of the expressions of interest received, the Commission will decide whether to move to application stage. If a decision to proceed is taken, and following the necessary consultation with, and approval of, the Commission for Communications Regulation (Comreg), applications for licences to establish stations to serve communities in specific areas will be invited. A Guide to Submissions outlining the criteria to be used by the Commission when assessing applications will be made available to all interested parties at this stage. These criteria will include the statutory provisions in Section 6 of the 1988 Act and Section 60 of the Broadcasting Act 2001. Both Acts are available on the Commission's web site www.bci.ie. A sample Guide to Submissions is also available on the Commission's website.

The number of licences issued will depend on the applicants meeting the required criteria, the availability of frequencies, the resources of the Commission and any other considerations which may be relevant from time to time, such as the totality of services in a specific area. Selected applicants may then be invited to attend oral hearings. The Commission reserves the right not to award licences in an area where, in the opinion of the Commission, an application is not of a sufficient standard.

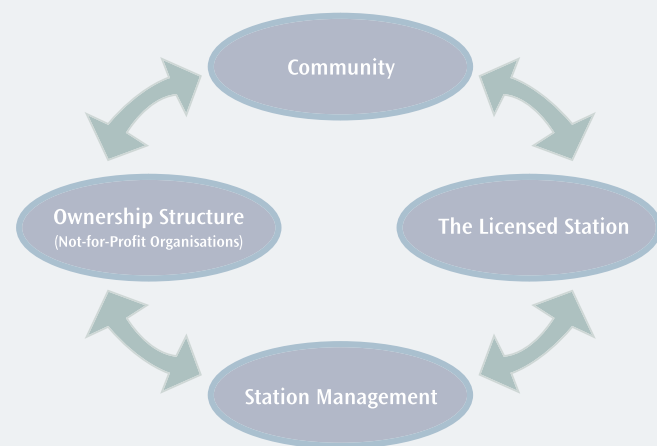
If the Commission decides that an application is of sufficient standard, it will award a contract, in principle, subject to agreement on any outstanding issues and the successful conclusion of contract negotiations. The applicant will be notified of this decision in writing and a draft contract will be forwarded in due course. The draft contract will set out the standard terms for a community broadcasting contractor and incorporate the specific commitments given by the applicant during the application process. The applicant may be required to submit additional information or clarification in relation to some of the required information. While the standard licence term for stations in the community strand is generally five years, the BCI retains the right to vary the terms and conditions of each individual contract.

The Commission can also facilitate aspirant community radio groups through the provision of contracts for temporary sound broadcasting services⁶. In instances where the proposed service will act as a pilot for a full community service, the application will be expected to comply with the Commission's policy with regard to community broadcasting services.

⁶ For more information on temporary sound broadcasting services, check the website of the Broadcasting Commission of Ireland, www.bci.ie

3 Ownership and Management Structures

The definition of community radio, outlined in section one of this document, provides clear guidelines as to the ownership and management structures which community stations should operate. The definition states that stations should be owned and controlled by not-for-profit organisations. In addition, their structures should provide for membership, management and operation of the station by the community served. The BCI has adopted a proposal developed by the Community Radio Forum that these are best implemented using the following non-hierarchical model.



In this ideal situation, the community served can participate at all levels. The station is accountable to the community and the community are in control of, and therefore responsible for, the station. It recognises that a balance is required at management level between those who are active in the station and the community served. In a perfect situation, there should be no apparent division between the management representatives appointed at either station or ownership level. They are all representatives of the community served. This model also highlights the importance of having a clear definition of the relevant community and of developing structures to facilitate and promote their participation at all levels.

The Irish experience demonstrates that it might be unrealistic in all circumstances to expect groups to establish a separate legal ownership structure, especially in the short term. For this reason, the Commission acknowledges that the definition of community radio, outlined in section one, allows for some flexibility in relation to ownership. This is only possible in instances where the right of the community served to control the station is not unduly affected. While having ownership vested in the community served is, undoubtedly, the best way to guarantee this, ownership and control are not inseparable.

4 Funding and Finance

Although funding cannot be separated from other areas, it is seen by many as the central focus for any discussion about the development of community broadcasting. The Irish experience demonstrates that although community broadcasting services, as defined here, are viable, funding individual stations is an ongoing challenge for licensed groups and the communities served.

Both the AMARC Charter and the Forum report, "A Community Radio Model for Ireland"⁷, state that community stations should be funded from a diversity of sources. The BCI supports this approach. The Irish experience has shown that it is not only the most realistic, but that it is essential, if stations are to ensure that programming is determined primarily by the community served. In this context, the BCI requires that no more than 50% of a community station's income should come from any one source. Therefore, the community served will always have to take some responsibility for supporting the operation of a community station in their area. A variety of approaches to attracting support from the community served have been developed by Irish stations, including membership fees, sale of services, collections, general fund-raising and on-air commercial activity.

The last of these, on-air commercial activity, has been a central focus of attention for community stations since 1995. It is also a key issue for the BCI since regulating such activity on licensed stations is the responsibility of the Commission. Although securing support through conventional sponsorship and advertising has proved more difficult than community groups had anticipated, the Irish experience suggests that on-air commercial activity will remain an essential funding source for community broadcasters. The Commission, therefore, allows community stations to broadcast advertisements and sponsorship announcements, subject to the following conditions:

- 1 no more than 50% of income is secured from commercial activity;
- 2 a maximum of 6 minutes advertising/ sponsorship per hour will apply;
- 3 stations may only broadcast advertisements which relate to:
 - work opportunities which exist in the specified area
 - events which are to occur in the specified area
 - businesses which are carried on in the specified area
 - services which are delivered in the specified area.

⁷ "A Community Radio Model for Ireland" – This was developed by a working group established by the Community Radio Forum in 1996. The document was endorsed by Forum Members in 1997.

The Commission believes that the possibility of co-ordinated funding for community stations from appropriate statutory sources should be considered. While all licensed stations receive a significant amount of support from a variety of public sector sources, the need for a more focused approach to funding community stations is required. The Commission endorses the Community Radio Forum's call that the mechanism for this should be clearly defined and that community radio should be included in the support structures in place, and being developed for, community and voluntary organisations generally⁸.

It is the policy of the Commission to support efforts to increase the resources available to community broadcasters and specific initiatives in this area will be reviewed on an ongoing basis in the context of the Commission's statutory remit and its own future funding situation.

The Irish experience has also provided some general information about the resources required to establish and operate a community station. While capital costs are dependent on individual decisions about equipment and premises, the Irish experience suggests that a basic studio in suitable premises can be established for around €20,000⁹. The Irish experience also suggests that the annual running costs for a community station, which has no paid staff, should be around €40,000. It is estimated that hiring one person and providing the necessary support would require an additional €40,000, bringing the per annum cost to €80,000. Therefore, two general models for community stations have emerged¹⁰.

STATION TYPE	ANNUAL RUNNING	COST STAFFING STRUCTURE
Type One	€40, 000 Approx.	No Full Time Station Paid Staff
Type Two	€80, 000 Approx.	One Full Time Station Paid Staff

⁸ For example, in 2001 the Department of Social, Community and Family Affairs published 'Supporting Voluntary Activity' A White Paper on a Framework for Supporting Voluntary Activity and for Developing the Relationship between the State and the Community and Voluntary Sector. Several funding initiatives arose from the implementation of the recommendations in the White Paper including funding support for the National Anti-Poverty Networks, the Committee on Volunteering and for national federations and network organisations.

⁹ It should be noted that this estimate is an indicative one and does not allow for any exceptional costs which could arise in areas such as transmission for stations serving scattered communities or covering rugged terrain.

¹⁰ These figures do not include funds received to pay employment/training scheme participants. This is because the number of scheme participants can vary significantly from one station to the next and a specific wages grant is provided to pay the individuals involved. The figures do include the materials grant paid to groups who sponsor these schemes, as this is income that can be used to support general station activity. This is an indicative figure, rent and other costs may vary considerably from station to station.

5 Staffing and Training

The Irish experience has demonstrated that staff in community stations can broadly be divided into four categories. These are:

- 1 Volunteers
- 2 Those paid using station resources
- 3 Those participating in employment/training schemes
- 4 Others (mainly people paid by a supporting organisation to carry out specific tasks, e.g. accounts)

While the contribution of people in all four categories is significant, the importance of community participation in a voluntary capacity for community stations was reinforced by the Irish experience. The extent to which members of the community served are willing to give of their own time, in a voluntary capacity, to support their station is seen by the Commission as a key indicator of the success of that station. As providing suitable training on a formal and informal level proved critical to progress in this area, it is the policy of the Commission to seek commitments in relation to training from interested groups.

The Irish experience has indicated that two full-time paid staff is desirable if a community station is to achieve its full potential. However, the Commission recognises that in the current funding environment, stations are unlikely to be able to employ more than one full-time person in the foreseeable future. The Irish experience has also indicated that this person should ideally have management skills plus some previous media and community development experience.

The Commission acknowledges the important contribution made by government-backed employment/training schemes to the development of stations in the community strand. These provide valuable human and financial resources which, when used effectively, aid the general development of community stations. The potential benefits for participants are also significant as a number of trainees subsequently obtain full-time employment. Although such schemes are used by a variety of community action projects nationally and internationally, the community radio experience has shown that organisations need to ensure that a balance is maintained between scheme participants and volunteers in all areas of activity.

The number of people included in category four above differs from station to station and this is expected to continue.

6 Programming

The Irish experience indicates that the development of a viable community broadcasting service depends on a station providing a new and unique forum for communication between individuals and groups within the community served. The definition of community radio, outlined earlier in this document, states that programming should be based on community access and reflect the special interests and needs of the listeners a station is licensed to serve. The AMARC Charter states that community stations should promote and protect cultural diversity and inform their listeners on the basis of information drawn from a diversity of sources.

The Community Radio Forum endorsed the relevance of this approach to programming in its report 'A Community Radio Model for Ireland'. In this, the members argued that "community stations should strive to develop new and innovative formats which can act as an ongoing challenge for community broadcasters, as well as being a defining characteristic of the sector". In the context of licensing, the approach to programme content, format and scheduling, and how a station meets the above objectives, will be considered. The Irish experience has shown that community broadcasters are most successful when they endeavour to provide a new service which will add to the diversity of programming available, rather than replicating the format and content of existing services.

It is the policy of the Commission to include in all contracts an approved Programme Schedule and Programme Policy Statement. Policy statements should set out the station's programme philosophy and detail its plans to facilitate and promote community participation. Statements will be expected to include clear commitments in relation to areas such as speech/music ratio, Irish language programming, music policy and externally-produced programmes. Any changes to the agreed schedule or policy statement will require BCI approval in advance.

It is clear from the Irish experience that the level of community participation required to achieve these programming objectives needs to be actively developed and supported. Establishing an awareness within the community of its communication needs and enabling members of the community to address these, is a greater challenge than many groups anticipate.

7 Community and Audience Relations

Authoritatively evaluating the relationship between a station and the audience is an important part of any assessment of the performance of a licensed broadcaster. The Irish experience has demonstrated that active community participation and general listenership are equally relevant when assessing a community station's relationship with the community served.

Developing methodologies which recognise this unique dynamic is a challenge facing community broadcasters and other relevant organisations in Ireland and abroad. In recognition of this fact, the Commission engaged an external research organisation, NEXUS Research Co-operative, to examine this issue in 1996. NEXUS concluded that facilitated evaluation workshops could be used to evaluate the impact of a community station. This mechanism had been used previously to evaluate other community action projects. It was seen as particularly relevant, since it not only invited representatives of the community served to evaluate the relevance and performance of the station, but also allowed the station to challenge the community to take responsibility for the implementation of the emerging suggestions.

The methodology was piloted in six stations in 1996 and, while some difficulties were encountered, the initiative was generally considered to have been very successful. The qualitative approach to audience research was endorsed by the Community Radio Forum at a meeting in March 1997. The development of an appropriate quantitative methodology is a challenge which still needs to be addressed and the relevance of the of such methodologies is still a matter of debate.

It is the policy of the Commission to seek information on how prospective licensees intend to approach the issue of community and audience evaluation, including the methodologies they propose to use and the frequency with which these will be applied. The report on the facilitated workshop process is available to all interested applicants. Licensed stations may also be required to participate in future initiatives in this area.

Appendix

The AMARC Community Radio Charter for Europe

Recognising that community radio is an ideal means of fostering freedom of expression and information, the development of culture, the freedom to form and confront opinions and active participation in local life; noting that different cultures and traditions lead to a diversity of forms of community radio; this Charter identifies objectives which community radio stations share and should strive to achieve.

Community Radio Stations:

- 1 promote the right to communicate, assist the free flow of information and opinions, encourage creative expression and contribute to the democratic process and a pluralist society;
- 2 provide access to training, production and distribution facilities; encourage local creative talent and foster local traditions; and provide programmes for the benefit, entertainment, education and development of their listeners;
- 3 seek to have their ownership representative of local geographically recognisable communities or of communities of common interest;
- 4 are editorially independent of government, commercial and religious institutions and political parties in determining their programme policy;
- 5 provide a right of access to minority and marginalised groups and promote and protect cultural and linguistic diversity;
- 6 seek to honestly inform their listeners on the basis of information drawn from a diversity of sources and provide a right of reply to any person or organisation subject to serious misrepresentation;
- 7 are established as organisations which are not run with a view to profit and ensure their independence by being financed from a variety of sources;
- 8 recognise and respect the contribution of volunteers, recognise the right of paid workers to join trade unions and provide satisfactory working conditions for both;
- 9 operate management, programming and employment practices which oppose discrimination and which are open and accountable to all supporters, staff and volunteers;
- 10 foster exchange between community radio broadcasters using communications to develop greater understanding in support of peace, tolerance, democracy and development.