Enhancing Innovation and Sectoral Sustainability

BAI Community Media Action Plan

1. Introduction

In January 2019, a report from the Community Media Working Group ("the Report") was presented to the Authority. The Report contained a series of proposals put forward by representatives of the community radio and community television sectors which seek to improve sustainability and increase participation. The Report was prepared by independent facilitator Niamh Farren following a series of meetings in 2018.

Following the discussion, it was agreed that the BAI Executive would revert with an action plan for 2019, taking into consideration the Report and other issues arising from the BAI’s broader interaction with the community media sector in terms of sectoral development, licencing and compliance. The proposed action plan is set out in Section 2 below. It is important to note that the plan does not cover two areas raised in the Report - the operation of the Broadcasting Fund and the Broadcast Levy. The former is the subject of a separate statutory review process in 2019, while the latter is being considered by the DCCAE in the context of new legislation. The BAI would also note that a review of overall policy on community broadcasting is a more substantial piece of work that should be considered in the context of the successor to the current Strategy and related workplan.

2. Proposed Actions

This is divided into two sections to follow the structure of the Report and to acknowledge that the community radio and community television sectors are at different stages of development.

2.1 Community Radio

(a) Develop, pilot and review an evaluation methodology that focuses on measuring social benefit outcomes.

The development of a new evaluation methodology was one of the main recommendations emerging from the Report. Currently, evaluation at a sectoral level is focused on a quantitative methodology that measures voices on-air. This was developed by CRAOL to support the case for Pobal funding. The methodology encourages stations to prioritise participation only in terms of the volume of voices on air. As such, it neglects critical areas such as participation in the
operation of the service. In addition, it drives stations to increase broadcasting hours which can lead to capacity and compliance issues as identified in BAI interactions with contractors.

The initial components of a more qualitative, outcomes-based methodology were broadly developed by the sector in previous years, and similar models are currently being applied in the wider community development sector. This project would seek to develop, implement and evaluate such a measurement tool with 4/5 stations, with a view to having it adopted as suitable methodology by the sector and funders such as Pobal. As outlined in Report, Pobal is conducting a review of the Community Services Programme ("CSP") – which supports community stations - in 2019. The suitability of evaluation methodologies, such as voices on-air, will be part of the review of CSP and Pobal has expressed interest in examining alternative approaches. In addition, demonstrating and documenting the nature and range of a station’s relationship with its community should also help to identify initiatives that would increase community participation in the sector.

Funding for the project (€30k) will be provided for via the BAI’s Sectoral Learning and Development’s Community Broadcasting Support Scheme (CBSS). Funds are available from the budget approved by the Authority in January 2019. A Joint Steering Group, comprising of representatives from the BAI Executive and CRAOL will be convened to manage the project and the final report will be a joint publication. It is proposed that the pilot will be put out to tender and that the project will be managed by the BAI with involvement from CRAOL.

**Action 1 – The BAI will engage with CRAOL to develop, implement and review a new social benefit focused evaluation methodology and will commit €30k to the project in 2019.**

**(b) Engagement with Pobal**

The Report highlighted the interdependent nature of the relationship between the BAI and Pobal in ensuring the sustainability and development of the community radio sector. The Report identifies the 2019 CSP review as an opportunity to address issues with the current programme and recommends that the BAI and CRAOL engage with this process.

The need for a greater level of ongoing engagement between Pobal and the BAI had already been identified as a priority by the Executive. Members of the BAI’s Compliance team met with Pobal in 2018 and agreed a broad strategic approach that will seek to reduce current administrative burdens on all stakeholders. During this meeting, it was also agreed that greater alignment between the BAI and Pobal on some community radio related matters should be explored further. The BAI Executive will continue to enhance operational links with Pobal in
relevant areas to identify and implement actions that will contribute to the future sustainability of the community radio sector.

Action 2 – The BAI will engage with the CSP review with a view to ensuring that the scheme remains open and relevant for community broadcasters.

Action 3 - The BAI will continue to develop its strategic engagement with Pobal to ensure alignment where possible in relation to compliance requirements on community broadcasters.

(c) Sectoral Learning and Development

In December 2018, the BAI agreed to consider proposals for multi-annual funding for CRAOL on the basis that this would facilitate greater strategic planning by the sector. In January 2019, the BAI approved sectoral development funding of €120k for CRAOL in 2019 based on the action plan submitted. Weak governance structures and practices were identified in recent years as a major challenge for the sustainability of individual community stations. Strategic intervention and support in this area has been a focus of activity supported by the BAI through its sectoral learning and development funding in recent years and this continues in 2019. This has contributed in helping to address these challenges and the BAI will continue to target its support in areas which are identified as a priority from its general interaction with community stations.

Action 4 - The BAI’s Sectoral Learning and Development funding will particularly target initiatives that support sustainability and increase participation.

1 Significant work has also been undertaken by the Executive via its Compliance engagement activities with community radio stations.
(d) Enhanced Structural engagement with CRAOL

A positive outcome from the Community Media Working Group was the development of an enhanced relationship between the BAI and the community radio sector in relation to development issues. The BAI proposes that this relationship should be further developed in 2019. The BAI Executive has attended CRAOL’s regional meetings on request in the past and proposes that BAI representatives will attend CRAOL’s regional meetings in a regular and formalised capacity going forward. In addition, the Joint Steering Group proposed under (a) above will make a contribution here.

Action 5 - The BAI will develop a more structured engagement with CRAOL

2.2 Community Television

(a) Core/operational funding

The BAI analysed the sector’s proposal for €50k of funding per television station (Dublin City Community Television & Cork Community Television) - to be used solely for operational purposes. Current legislation, namely the Broadcasting Act 2009, does not provide for the BAI to administer a fund providing core operational costs for community broadcasters. Based on the size of the sector, and the indicative core costs estimate, the annual cost of such funding would be €750k per annum. Indeed, the licensing framework in 2009 Act, and related BAI policy, requires licensed community broadcasters to be capable of securing support to meet their resource needs. It is also noteworthy that the two community TV channels recognise that ongoing core operational support would require a new funding stream to be available to the BAI. In this context the two stations are seeking the allocation of 0.5% of the licence fee (€1m) for this purpose. Any such initiative would require legislative change, and this is a matter for the Minister.

It is clear from the Report, and the BAI’s interaction with the two channels, that they both have different visions of what constitutes the best operational model for a community TV channel. A good example here is the lack of structured sectoral engagement with Pobal with regard to support from the CSP programme. DCTV were approved for a CSP project at one point, however it did not progress due to developments outside of DCTV’s control. In addition, they have had different levels of success in securing resources from commercial and state sources. This divergence of vision and experience made it

---

1 €50k per TV station and €30k per radio station based on BAI Policy on Community Broadcasting and the Report.
challenging to progress sectoral plans in the working groups and this is evident in the proposals included in the Report.

**Action 6 – The BAI proposes not to progress with the community television sector’s proposal for core/operational funding**

**(b) Proposal to extend licences**

The licensing contracts for both channels expire in April 2020. The 2009 Act requires the BAI to conduct or commission an assessment of the extent to which each channel has facilitated active participation in the community; whether the community views the programmes; and the community's opinions on the programmes.³ This broader community input could be useful in progressing thinking and discussions about a viable community TV model in Cork and Dublin. The station-specific nature of the research could also be useful given the Working Group experience. In addition, the pilot radio project could provide a useful starting point for the most appropriate methodological approach. Given available resources, proposed processes, and timeframe, it will not be possible to conclude this evaluation and complete a licensing process in 12 months. Therefore, it is proposed to offer both channels a further 2-year contract extension to allow time for the statutory evaluations to be conducted in the expectation that these will assist in progressing discussions at a channel level about an appropriate sustainable operation model.

**Action 7- The BAI proposes to offer DCTV and CCTV a 2-year extension to their current contracts to allow further time to develop viable operational models**

**Action 8 - The BAI will develop, implement and review a methodology to implement the requirement in Section 72 (6) in each service area in 2020, with a view to using this process to progress discussions about viable community TV models and informing the licencing process.**

³ Section 72(6)
(c) Sectoral Learning and Development

In January 2019, the BAI approved sectoral development funding of €36k for the CTA in 2019 - based on the action plan submitted. The proposed actions for 2019 were similar to projects funded and held in previous years and included a mix of sectoral and station-specific development. Within this proposal, the CTA also sought funding for additional projects in 2019, for types of activities not previously funded by the scheme. The CTA submitted that these projects were addressed in the recommendations in the Report. The BAI Executive, however, did not concur with this conclusion. Accordingly, the Authority did not approve funding for these additional proposals.

With this in mind, the BAI Executive will offer to enhance engagement with the CTA around the purpose and scope of Sectoral Development funding

**Action 9- The BAI will engage with the CTA to clarify the purpose and scope of Sectoral Development funding**