



Broadcasting Authority of Ireland

DRAFT BAI Community Media Policy

Introduction

The Irish experience has demonstrated that community media can make a significant contribution to ensuring diversity in the overall media landscape. It also shows that realising this potential requires a substantial level of ongoing commitment and support from all stakeholders especially state agencies and the communities served. While the value of the content produced by community media practitioners is well recognised, this needs to be supported by robust operational and governance structures and practices. Without these, successful and sustainable operations are not achievable and this can undermine individual projects and the entire sector. The BAI is committed to working with all stakeholders to ensure the potential of the community media sector is realised while remaining focused on its statutory requirement to ensure that licenced community media operators meet the requirements in the Broadcasting Act 2009.

This document is intended to inform interested parties nationally and internationally about the BAI's policy in relation to community media in Ireland. The Policy is informed by, and linked to, other BAI Policies and Statements, which include it's [Broadcasting Services Strategy](#), the [BAI Ownership & Control Policy](#), the Authority's [Strategy Statement](#) and relevant [Licensing Plans](#). The Policy will inform all aspects of the Authority's work in relation to community media including licensing and the operation of the Broadcast Fund.

This document is divided into the following sections:

1. Defining Community Media
2. The Social Benefit of Community Media
3. Community Media Content
4. Ownership, Governance and Management of Community Media
5. Funding and Finance of Community Media
6. Staffing and Training of Community Media



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1. Defining Community Media

Several decades of Irish experience of community media affirms the sector's wider global tradition. Community media are an important and growing element of the media ecosystem around the world and linked through national and international associations such as CRAOL and AMARC. Community media are deeply rooted in democratic, participative and empowering traditions¹. Building on Article 19 of the Universal Declaration of Human Rights, community media aspire to the right to communicate². This affirms everyone's right to equitable access to the means of expression, to create and disseminate their own media, and to communicate freely with others. Communication rights embrace the idea of democratising media structures as a key way to reinforce media content's contribution to social justice and to generating and disseminating the knowledge and understanding essential to global sustainability³.

The experience in Ireland also clearly shows that community media are deeply embedded in the structures and dynamics of communities as they continuously evolve, develop and renew themselves. As part of the community infrastructure they both engage their communities directly in the process of media production and dissemination, and amplify and reinforce the efforts of numerous organisations in the community and voluntary sector. The 2009 Broadcasting Act recognises community radio and community television as a distinct strand of media in Ireland. The other two strands identified in the Act are public service media and independent commercial media. This reflects the position articulated by independent media regulation in Ireland since 1997. While a media organisation's operation may overlap with one or both of the other strands, each must fundamentally belong in one of them.

The 2009 Broadcasting Act provides for Community sound broadcasting contracts (Section 64) and Community content provision contracts (Section 72). The Act requires these services to be owned by two or more members of a local community who are representative of and accountable to the community serviced. It further requires that the services provided "address the interests of, and seek to provide a social benefit to, that community". Finally, there is a requirement that the services operate "on a cost recovery basis."

In 1994, the BAI's predecessor, the IRTC, adopted the AMARC Community Radio Charter for Europe as a statement of what community stations should strive to achieve. The Irish experience reinforces the relevance of this Charter for community media enterprises in general in Ireland,

¹ There is a large literature on the ethos of community media, among them: Howley, K. (2005) *Community Media: People, Places, and Communication Technologies*, Cambridge University Press; Rodriguez, C. (2001). *Fissures in the mediascape: An international study of citizens' media*. Hampton Press (NJ). Downing, J. D. (2000). *Radical media: Rebellious communication and social movements*. Sage. The *Journal of Alternative & Community media* is published regularly: see <https://www.intellectbooks.com/journal-of-alternative-community-media>

² Both CRAOL and CTA reference the right to communicate, respectively in AMARC's Community Radio Charter for Europe (see Appendix 1), and in the 2011 CTA's Community Television Charter

³ Background on the right to communicate is available here: <https://ccrvoices.org/background-on-communication-rights/>



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and despite huge and ongoing changes in the media sector worldwide it remains useful as a reference point for all community media. The Charter is attached as an appendix to this document.

Reflecting the above regulatory framework, and in order to provide greater clarity on what makes community media unique, the Authority has adopted the following definition of community media in an Irish context.

"A community media organisation is characterised by its ownership structures, its content production and/or dissemination activities, and its relationship with the community it is licenced to serve. It is owned and controlled by a not-for-profit organisation whose structure provides for membership, management and operation primarily by members of the community. Its content production and/or dissemination activities are based on access and participation by members of the community and reflect the special interests and needs of that community. Its relationship with the community seeks to reinforce other organisations and activities aiming to empower and develop that community."

The Authority also uses the following three criteria in assessing the 'community nature' of relevant organisations and groups. Entities included in the community broadcasting strand are 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 that is specifically in keeping with the ethos or value system which underpins community activity and community media.

The Authority recognises that as the community media sector develops in the new media environment, individual community media organisations and outlets will operate at different levels of development and across different platforms. However, the characteristics identified above should be evident in all such entities and in particular the value system which underpins such organisations should support community development and empowerment in terms of structures, governance and operations.



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2. The Social Benefit of Community Media

The Broadcasting Act 2009 states that community media must seek to provide a social benefit to their communities. Drawing on the actual experience of community radio, the BAI supported the design and development of a Framework for Assessing the Social Benefit of Community Media⁴. The definition of social benefit included in this Framework, arrived at through a process of consultation, was as follows:

“Benefits to individuals or collective actors in the community that enhance their lives socially, culturally or economically, or in terms of development, empowerment and/or well-being, that otherwise would not have come about.”

Six types of social benefit associated with community media are identified:

1. Individuals, especially minorities and those marginalised, are growing in confidence and creativity and/ or reinforcing a sense of belonging, directly from engaging with the Station
2. Individuals are enhancing their employment prospects, through gaining skills and confidence reinforcing community identity
3. Community members are informed and aware of what is happening around their community
4. Community members are responding more effectively to issues—local to global—because they have access to diverse viewpoints and to more and better information
5. Collective actors (CBOs, NGOs etc.) are facilitated, and reinforced in their capacity to achieve their goals
6. The community sense of identity and cohesiveness is enhanced through interaction and collective action.

The Framework is accompanied by a detailed methodology that can be applied by community media organisations to assess the level and nature of social benefits generated⁵.

This concept of social benefit is widely endorsed by the licensed community media sector, both radio and television, and is being applied by the BAI in assessing the value created by community media organisations in their communities. It is important to note that not all benefits have to be equally evident and that some are easier to measure than others.

⁴ http://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf

⁵ <http://www.bai.ie/en/download/134920>



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3. Community Media Content

The definition of community media in Section One requires that the content produced and disseminated should be based on community access and reflect the special interests and needs of the community served. The Irish experience indicates that the development of a viable community media sector depends on practitioners providing a new and unique forum for communication between individuals and groups within the community served.

Content is at the heart of all community media and the definition of community media points to a continuum of possibilities for community media content. There is no limit to the nature and diversity of content that can be produced by community organisations other than their capacity to generate this social benefit for their communities. The generation of social benefit through content provision requires resources for all aspects of the production and dissemination process. This includes strong governance and evaluation processes to ensure that available resources are deployed effectively to produce content that will maximise the delivery of social benefit to the community served. The Irish experience has shown that community media need to proactively demonstrate the value created by their activities to the community served and among other stakeholders.

Technological developments and convergence have revolutionised the means of production and dissemination of content and community content is no different. However, this has also presented new challenges in terms of ensuring that communities can identify, access and positively engage with content that delivers social benefits. Community media needs to ensure that the unique characteristics of their content are highlighted in order to ensure that the distinctive value of their activities and the social benefit provided, are clearly evident to all stakeholders.

Content accessibility to the community, actual and potential, is also critical, and here such concepts as ensuring prominence and 'findability' across platforms are important. Platform neutrality facilitates the dissemination of community content that generates public benefit to a larger range of citizens within the community and beyond. To realise this potential, citizens must be able to find, recognise, access and engage with that content easily in a rapidly evolving media landscape. The BAI is committed to working with the community media sector to ensure that the potential of community media content to generate public benefit is maintained and enhanced as the media sector and technologies evolve.



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4. Ownership, Governance and Management of Community Media

The Broadcasting Act 2009 states that contracts may be entered into by the BAI with members of a community that are “representative of, and accountable to the community concerned” and that the sole objective must be to achieve “a monetary reward or no greater amount than is reasonably necessary to defray the expenses...” (Sections 64 and 72 respectively for radio and television). This underpins in legislation key aspects of the definition of community media outlined in section one of this document, which points to the ownership and management structures of community media organisations. The definition states that community media organisations should be owned and controlled by not-for-profit entities. In addition, their structures should provide for membership, management and operation of the organisation by members of the community served.

The BAI applies the following non-hierarchical model:



This model 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. As outlined in Section One, this could be a geographical community, or a community of interest, that will work together to support their own development within an ethos of creating community value. This focus on community development and community value are critical components of community media.



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In the ideal situation, the community served participates equally at all levels. The organisation and operation is accountable to the community and community members are in control of, and therefore responsible for the entity. It acknowledges that a balance is required at management level between those who are active in the organisation and the community served. There should be no significant distinction between the management representatives appointed at either organisational or ownership level. All are representatives of the community served. While having ownership vested directly in the community served is, undoubtedly, the best way to guarantee this, ownership and control are not inseparable. 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 initial phase of development. However, in such instances it is critical that the control by the community served over the operation is maintained.

The interdependency between a successful community media operation and its ownership and management structures is also highlighted in the model. The importance of robust governance policies and practices has been a recurring theme for the community radio and television sector in Ireland over the past 25 years. The Irish experience has demonstrated that weaknesses at an ownership and management level have the potential to seriously undermine the viability or individual community media operations and the reputation and credibility of the entire sector. This challenge is not unique to the community media sector and supports and best practice models have been developed by community media organisations and the community sector more generally. A good example here is the Charities Governance Code which many community organisations who are also charities must comply with.

The BAI has played an active role in fostering and sustaining good governance practices in the community media sector in partnership with media organisations and their representative bodies. The BAI will continue to place an emphasis on this area in its interaction with operators especially licensing and compliance processes, as the delivery of social benefit is founded on strong governance and management practices. The BAI remains committed to working with all stakeholders to ensure that the community media sector can be a model of best practice for the community sector more generally.



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5. Funding and Finance of Community Media

Although funding cannot be separated from other areas, many see it as the central focus for any discussion about the development of community media. The Irish experience demonstrates that although the community media sector, as defined in Section One, is viable overall, funding individual media organisations, of very different natures and size, is an ongoing challenge for operators and the communities served.

It is BAI policy that community media organisations should be funded from a diversity of sources, and this is endorsed by the community media sector. The Irish experience shows that this is not only the most realistic approach, but that it is essential if a community media entity is to ensure that its activities and programming are determined primarily by the community served. In this context, the community served will always have to take some responsibility for supporting the operation of their community media organisation. A variety of approaches to enabling financial support from the community served have been developed, including membership fees, sale of services, collections, general fund-raising and on-air commercial activity. The Irish experience suggests that all of these are required and that the mix deployed will vary depending on individual circumstances of any community media organisation.

The Irish experience has shown that a more co-ordinated approach to supporting and resourcing the community media sector from relevant statutory sources and agencies would be beneficial for the sector and the relevant state agencies. This can be related to the types of social benefit that are generated for individuals, community members and collective actors in the community as outlined in Section 2 above. The Social Benefit Framework and related Handbook provides a structure for defining and evaluating the variety of activities that community media could be supported to successfully deliver. The sector has a strong track record in many of these areas including structured training, community empowerment and media literacy. The Authority is committed to working with all stakeholders to ensure that there is greater alignment of purpose in relation to available supports and believes that the community media sector has an important contribution to make in relation to how this is achieved in principle and practice.

The Authority also supports efforts to increase the resources available to community media organisations, and specific initiatives in this area are reviewed on an ongoing basis in the context of the Authority's statutory remit and its own future funding situation.



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6. Staffing and Training of Community Media

The Irish experience demonstrates that active participants in community stations can broadly be divided into four types. These are:

1. Volunteers
2. Those paid using the organisation's own resources
3. Those participating in employment/training schemes
4. Others, mainly people paid by a supporting organisation to carry out specific tasks such as accounting and administrative work

While the contribution of people in all four categories is significant, the importance of community participation in a voluntary capacity is 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 community media organisation is seen by the Authority as a key indicator of its success. Since providing suitable training on a formal and informal level proved critical to progress in this area, it is the policy of the Authority to seek commitments in relation to training from interested groups.

The licensed activities, comprising at the moment of community radio stations serving a sizeable geographical community or a television channel broadcasting community content over cable, require a certain minimum level of permanent staffing. The Irish experience has indicated that two full-time-equivalent paid staff is usually desirable if a community media entity is to achieve its minimum potential and a stable existence. The Irish experience has also indicated that staff should ideally have management skills plus some previous media and community development experience.

The desirability and value of a continuum of community media organisations/operations is also evident from the national and international experience to date. In Ireland we have seen the emergence of hubs engaging in a multiplicity of activities and employing many people to smaller operations focused on a single activity and run entirely by volunteers. While larger hubs can reach out into the community and deliver a broader range of social benefit smaller more focused entities can equally support strong community development outcomes and create value.

The Authority acknowledges the important contribution made by government-backed employment/training schemes to the development of community media organisations. These provide valuable human and financial resources which, when used effectively, aid the general development of community operations. 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 media experience has shown that the schemes themselves must be designed or adopted to meet the specific characteristics of the sector, and that community media organisations need to ensure that a balance is maintained between scheme participants and volunteers in all areas of activity.



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Appendix

The AMARC Community Radio Charter for Europe

Although this was produced originally for community radio, it can be applied to community media more generally.

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