

Community Media Policy and Regulation for the Future.

A Paper for the Broadcasting
Authority of Ireland

Seán Ó Siochrú
Nexus Resarch Cooperative

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Preface:

This paper was commissioned by the Broadcasting Authority of Ireland in June 2016. Its preparation involved an extensive level of consultation with stakeholders in the community media sector, and interactions with academics and BAI staff. Draft versions were presented and discussed at the Community Radio Ireland's (CRAOL) annual Féile; and at the Community Television Association's (CTA) Community Television Festival. Direct feedback was solicited widely on its content.

The report begins by exploring the evolving place of community media in the Irish media landscape, offering a succinct definition and describing its distinguishing features. It looks at the appropriate scope of future policy and regulation for the sector, and at the evolution of the sector itself based on current trends; and it briefly outlines the funding and support context of the sector and how it should evolve.

Based on all of this, a draft Community Media Policy is presented in Annex 2 for consideration by the BAI.

The author is very grateful to all who participated. The final contents are solely his responsibility.

Summary

Objectives and goals of Community media

The three media sectors, commercial, public services and community, can be distinguished by their objectives. Commercial media, like all commercial organisations, must ultimately generate profits for shareholders, though they often do more along the way; public service media are obliged, in the case of RTÉ, to produce content and programmes that “reflect the cultural diversity of the whole island of Ireland and include programmes that entertain, inform and educate.”¹ Community media, closer to public service than to commercial, exist solely to empower and enrich communities, enabling them to use media tools and create content, to enhance individual creativity and to reinforce the community’s development activities.

Some key differences are evident: Community media i) create content that fulfils the specific needs of its community who may be a unique and/or minority group; but they also ii) enable people and communities to learn about and use media thus building media and digital literacy; and iii) explicitly reinforce the activities of other community development organisations.

At the level of practical goals, this definition of community media translates into six types of benefit:

In relation to media content, community members:

1. are provided with relevant and useful information to improve their lives in small or large ways;
2. have access to diverse viewpoints and better information enabling them to respond more effectively as active citizens to issues from local to global level;
3. have access to content that reinforces and celebrates their sense of identity, reflecting a sense of commonality and shared values within humanistic and democratic principles.

In relation to engaging directly with the community media organisation community members can:

4. grow in confidence and creativity and reinforce a sense of belonging;
5. gain media and digital literacy skills, vocationally and to enhance for critical media analysis;
6. assist community organisations in their efforts to achieve community development goals.

Key Characteristics of Community Media

In order to achieve these, a community media organisation must have certain characteristics:

1. **It must be democratic, participative and inclusive in ownership and management.** It must:
 - define the community it serves, geographic community of interest;
 - be a not-for-profit entity, and effectively owned by the community it serves;
 - offer opportunities for the community members to actively participate in its management;
 - enable the participation of marginalised groups within the community served.
2. **Production tools and facilities must be accessible to the community.** The organisation must:
 - provide access to content production facilities, ensuring accessibility for all **and/or**
 - provide access to training, support and mentoring, enabling community members, especially those marginalised, to use media production tools.

¹ <https://about.rte.ie/wp-content/uploads/2019/07/rte-public-service-statement-english.pdf>

3. Content produced and disseminated must generate social benefit for the community. It must:

- produce, curate and/or disseminate content that benefits members of the community and that promotes efforts by the community to empower and benefit its members.

Scope of community media policy and regulation

All community media should be considered under a **single policy and regulatory framework** since i) they all have the same objective of striving towards community empowerment and development; ii) the convergence of media and media platforms in general has reduced differences between them while opening up a range of new possibilities.

Yet there still exist distinct types of community media, differing in stages of development, and in content, production processes, resource requirements, and transmission platforms. These must be reflected in **differentiated policy and regulation at the media-specific level**, for instance in terms of forms of support, content regulation, and reporting and other obligations and responsibilities.

Expanding the continuum of community media

The recent radical shift of the media environment to embrace a huge range of new communication possibilities, including social media and platform neutrality, has shaken up existing regulatory structures, leading to the AVMS Directive and to moves towards a new Media Commission in Ireland that will integrate the various regulatory functions. Challenges for society have also emerged: for instance new media potential has been seized upon by authoritarian forces that, enabled by commercially driven and largely unregulated media organisations, manipulate media content and tend to undermine the democratic and independent media values.

These changes also offer an opportunity to community media. They can draw on their rich heritage, developed over decades across all continents, of supporting democratic principles and media independence on the ground. On the one hand, the sector can make a major contribution towards media and digital literacy, in its fullest sense; and on the other, it can enable communities and individuals to deploy the new media tools to achieving their personal and development goals.

Policy and regulation can support this process by, alongside existing community media radio and television licenses, enabling the emergence of **Community Media Hubs**, designed to serve several communities working hand in hand with other local organisations and institutions. They would offer:

- A **physical centre** for a community to engage with, learn about and create media and content; that doubles as a virtual centre that reaches out to the peripheries;
- A **training and capacity** provider, physically and virtually, across all media tools and platform with a key focus on media and digital literacy;
- A **production centre** for radio, podcast/vodcast, television, social media blogging, Websites etc.
- A **broadcast and dissemination centre** for all media, and that enables dissemination from the peripheries.

A special function of the hub would be, under the guidance of the regulator, to issue short term, on-demand, licenses for **micro-community radio**, covering no more than a few streets or a small village, or a community of interest. These could be run by local youth clubs, education institutions, and other organisations with social development goals, which could also provide the training and support needed.

Such an innovative approach, in regulation as well as in the media themselves, would contribute to the media regulator's – currently the BAI –strategic commitment to innovation.

Funding and Finances

Current financial support for the sector comes through the Sound and Visions 3 Scheme for content; the new pilot Community Radio Fund with wider application; and the Community Broadcasting Scheme with small grants for capacity building, research and networking. However, a major criticism of these over the years has been the absence of any contribution towards core funding, especially for community television.

Many community radio stations has been able to take advantage of Pobal's CSP scheme to cover at least some basic staff, though the emphasis on generating matching funding through trading is unsuited to the community media model and indeed can divert the stations from their main goal. Other sources of income have also been secured by both radio and television, but on a sporadic basis and seldom to cover any core costs.

The CSP is currently under review, as is the license fee system that funds Sound & Vision. There will also be a new stream of income available to the regulator from on-demand service providers under the EU's Audio Visual media Service Directive. It may thus be an opportune time to introduce a new support modality for community media.

An efficient and cost effective means may be through the creation of a consolidated **Community Media Support Fund**. This would combine resources from several sources, the BAI, government Departments and possibly the on-demand fee. It would be coordinated by a single lead entity, and work closely with CRAOL and CTA, the community media sector organisations. Different components should, taking into account the varied needs of different types of community media, administer support for core funding, community training and support, content production support, and so forth. It would seem reasonable that the new Community media Hubs would be supported with funds gathered by the on-demand license holders.

Another area of support from the perspective of regulatory relates to ensuring the **prominence and 'findability'** of community media content, in an increasingly cluttered media environment with visibility often heightened by big promotion and advertising budgets.

Community Media Policy and Regulation for the Future: Main Report

1 Community media: A foot in two camps

We live in a media saturated world. Our collective culture and individual identities are formed by the stories we tell about ourselves. Many of these stories are found on broadcast and online media, and increasingly these are driven by commercial rather than human values and shaped by anti-democratic forces linked to global power elites, the two sometimes working together. A few years ago, this would have been considered an exaggeration – even scare-mongering. Today, with large scale election manipulation, ‘false news’, implicit collusion between authoritarian leaders and global media corporations, and concerted efforts to devalue the very idea of truth and accuracy, it is widely accepted by the public and by governments. Digital and media literacy, the formal name for what society does to educate people to navigate these dangerous and deceptive waters, are now prerequisites for full participation in our democracy and society, political, economic and cultural.

Ireland’s rich heritage of storytelling and of being an open people is a national asset that can help in these difficult times. Community media, with roots firmly in the democratic and participative traditions of media globally, are uniquely placed to tap into and magnify these. Their objectives, history, structures and *modus operandi* place them potentially at the forefront of a renewal of media and communication that values people and communities; and that puts the instruments of media, and the content, in the hands of the people enabling them to achieve in the most practical way essential media and digital literacy.

But community media are much more than this; in fact, they are much more than just media.

What radically differentiates community media from their commercial and public service counterparts is that they have a foot in two camps: one in media and the other directly in their communities, in the structures and dynamics of communities as they continuously evolve and renew themselves. **As a media organisation** they offer information, entertainment, education and other relevant content to their communities. **But as part of the community infrastructure** they both engage their communities directly in the process of production and dissemination, and amplify and reinforce the efforts of a huge range of other community and voluntary organisations.

Thus, community media generate social benefits for their communities in two ways:

- through enabling community members to voice their own stories and content, and to navigate an increasingly problematic and manipulative wider media environment;
- through providing practical assistance and support to the numerous efforts of local organisations and individuals to address their problems and challenges and develop their full human and creative capacities.

It is this double-dimension of community media – being part of the media sector and of the community development sector – that sets them apart from other media forms. Both dimensions strive towards the same objective: to benefit the communities they serve.

This document foregrounds this dimension, and proposes a policy and regulatory environment that can nurture community media and enable them over time to realise their full potential for social benefit. It starts with community media as they are today – but moves to where they can grow into, supported by the right policy and regulatory environment.

2 Objectives and Goals of community media

Community media, in the form that they first emerged in communities and are practiced around the world today and linked through international associations such as AMARC, are deeply rooted in democratic, participative and empowering traditions². Building on Article 19 of the Universal Declaration of Human Rights, community media aspire to the *right to communicate*³. This goes beyond freedom of *expression* to embrace everyone's right to *equitable access* to the means of expression, to create and disseminate their own media, and to communicate freely with others. The internet has gone some way towards expanding access to the media content creation and dissemination. But communication rights also, and crucially, are based on 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 sustainability.

Objective

Such an approach to media offers an antidote to current trends towards devaluing truth and veracity in media, and deliberate manipulation of content by those supporting authoritarian and anti-democratic trends in society. While the community media sector in Ireland remains modest in scope, and concentrates most of its efforts – for good reason – on very local issues, its overall vision and objective and its potential is focused on these wider horizons. The overall objective of community media may be stated as:

To empower and enrich communities and community members, especially those disadvantaged or excluded, through i) providing beneficial information and content; ii) enabling them to design and manage their own media, to produce and disseminate content that embodies democratic and inclusive values, and to express their creativity; and iii) reinforcing the wider community's development organisations and activities.

Goals

The dual existence of community media, as both a distinct form of media that empowers people and as instruments to reinforce community development dynamics, is manifested in different ways, in its goals (what it is concretely trying to achieve), and in its operational definition (its characteristics) that includes the key attributes that enable it to achieve its goals and objective.

Although it is not possible to separate community media's **goals** that relate to the media sector from those that relate to the community sector, they can be distinguished in terms of the **content they produce** and the **practices they engage in**, which partly coincide with media and community sectors respectively.

² There is a large literature on community media, among them: Downing, J. D. (2000). *Radical media: Rebellious communication and social movements*. Sage; Rodriguez, C. (2001). *Fissures in the mediascape: An international study of citizens' media*. Hampton Press (NJ). Howley, K. (2005) *Community Media: People, Places, and Communication Technologies*, Cambridge University Press. The Journal of Alternative & Community media is published regularly: see <https://www.intellectbooks.com/journal-of-alternative-community-media>.

³ It is no coincidence that both the CRAOL and CTA reference the right to communicate, respectively in AMARC's Community Radio Charter for Europe (also appended to the BAI Community Radio Policy), and in the CTA's Community Television Charter (see Appendix 1 to Annex 2 below, and Annex 1 respectively).

Community media content, produced or ‘curated’ by the community, means that community members:⁴

1. are provided with **information** from, and relevant to, their communities that they can use to **improve their lives** in small or large ways; [SB 3]
2. have access to **diverse viewpoints** and better information that enables them to respond more effectively **as active citizens** to issues from local to global level; [SB4]
3. have access to content that **reinforces and celebrates their sense of identity** as a community, reflecting a sense of commonality and shared values within a wider spirit of humanistic and democratic principles. [SB6]

Community media practices, enabled by the community media organisation, means that community members can:

4. grow in **confidence and creativity** and reinforce a **sense of belonging**; [SB1]
5. gain **media and digital literacy skills** that enhance vocational prospects and the capacity for critical media analysis; [SB2]
6. reinforce the ability of **community organisations** to achieve their community development goals. [SB5]

Each of these can be characterised as a specific kind of **social benefit** that accrues to the community from the activities of the community media organisation.⁵

Any given community media organisation is likely to prioritise these to different extents; and likely also to engage in many other activities associated with media or with community development. However, these goals are characteristic of community media, differentiating them from other media forms.

Defining Features

To achieve these goals community media must have certain features: their form is central to their purpose. The key characteristics of a community media organisation cover its structural features, the access it enables for community to media tools, and the content generated:

1. **It must be democratic, participative and inclusive in ownership and management.**

This follows directly from its own claim that it promotes a democratic and inclusive ethos in the community. All community members must have the same opportunities to exert influence within a community media organisation, and management structures must be open to participation. Being inclusive means making an additional effort to ensure that those

⁴ The numbers in square brackets below are intended to demonstrate a close correspondence between the following six goals and the six types of social benefits. See the next footnote.

⁵ The term “social benefit” is deliberately chosen since it is used by the BAI when referring to the goals of community media. The idea is explored in depth in a recent study published by the BAI (download at https://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf). This phrase, though bland in itself, can encompass a wide range of features associated with the sector, such as such as community empowerment, critical reflection skills, media literacy and so forth, all of which can be considered as forms of social benefit.

often excluded from such participation are empowered to engage fully. In practice this means that a community media organisation must:

- define the community it serves, which can be geographic or a non-discriminatory community of interest;
- be constituted as a not-for-profit entity in which effective ownership can be exercised equally by community members or by representatives selected by that community;
- have a constitution that offers opportunities for community members to participate meaningfully in the management of the organisation;
- take specific actions to enable the full participation of marginalised groups within the community served.

2. **Production tools and facilities must be accessible to the community, both physically and through enabling use.**

Media production facilities these days can mean anything from a smart phone, to a laptop, to a television studio. The motto: 'affordable access and effective use' describes what a community media organisation might seek for its community members. In practice this means it must:

- provide access to media content production facilities, ensuring they are accessible to all **and/or**
- provide access to capacity-building in the form of training, support, mentoring or other, that will enable community members, especially those marginalised, to use media production tools that are accessible to them.

3. **Content produced, curated and/or disseminated must generate social benefit for the community and its members.**

- It must have an explicit goal to produce, curate and/or disseminate content that benefits the community, addressing individual needs and promoting efforts by the community to empower and benefit its members.

3 Scope of community media policy and regulation

All community media, whether radio, television or internet, strive towards community empowerment and development. There may be differences in how they work and interact with their communities and the tools they bring to bear, but the goals are the same. For that reason it makes sense to have a **single policy framework for all community media**. The logic of a single policy framework is also reinforced by the convergence of media and media platforms. Thus, regulatory principles, potential funding modalities, and the overall responsibilities of community media organisations can and should be applicable across the full sector.

At the same time, different types of community media have distinct characteristics. They differ in content, features and configurations, production processes, equipment and resource requirements, and transmission and dissemination platforms. Different media, for instance radio and television, are also at different stages of maturity in terms of achieving sustainability and establishing a viable model with an appropriate regulatory framework.

Such differences must be reflected in **differentiated regulation at the media-specific level**, for instance in terms of sustainability options, content formats and types, and reporting responsibilities.

4 Expanding the continuum of community media

The near-complete convergence of media on digital technologies has led to a proliferation of different platforms to access content, each of which can in principal carry almost any content. Whether that content is broadcast, internet-based, digital or FM analogue (a segment that resists convergence) makes little difference now. What matters are: the different *types of content that can be accessed* and its diversity; the *ease with which it can be accessed and used*; the context in which that content is *managed and presented to users* – everything from government regulation to commercial manipulation; and whether and what *users have to pay* for it.

Dealing with platform neutral content has presented major challenges to media regulators more familiar with dealing with discrete platforms. The AVMS Directive is a response at European level, and in Ireland the current proposal is for a new integrated Media Commission, comprising a *Broadcasting Commissioner*, and *On-demand Audiovisual Services Commissioner* and an *Online Safety Commissioner*, all under a new Media Commission.

It also presents challenges and opportunities to the community media sector, for instance with the growth of user generated content and with a plethora of on-demand and streaming options online: on the one hand, the use - and abuse - of these media for exploitation and the distribution of distorted and partisan positions; on the other, their potential for community activists and organisations to promote empowerment, to disseminate views and to communicate with supporters, decision makers and society in general.

The opportunity for the community media sector is to bring its deep ethical and cultural base to bear in these areas, especially through promoting ‘media and digital literacy’ and critical thinking, in the fullest use of these terms, within communities and to individuals, and by supporting the community level in deploying these technologies effectively to promote empowerment, creativity and their community development activities.

To seize this opportunity and achieve these goals, the community media sector - mirroring media in general - can be reconceived as a continuum, from macro to micro levels; from what are termed **Community Media Hubs**, multi-functional multi-media physical and virtual centres; to at the other end **micro- community FM radio** that allow local groups to broadcast, with minimum regulation, around their communities or to their members. Between these poles are the existing **community radio** stations and **community television** organisations.

Community Media Hub

The concept of the Community Media Hub is in line with trends in the community media sector, in which a few larger community media centres are extending their activities beyond those covered by their licenses. Mirroring the media sector as a whole, the Hub represents a convergence of the various platforms, technologies and activities into a single physical and virtual centre. The Hub serves both a local community but also for certain activities a much wider community, and would have a number of functions embracing existing ones such as radio and television and adding more. A community media Hub comprises:

- A **physical (and virtual) centre** for a community to come together and engage with, learn about and create media and content – organising together, sharing, planning , building – but one that is also designed from the start as a virtual hub that enables interactive engagement with the community at the peripheries;
- A **training and capacity** provider, both physically and virtually, building across all media tools and platforms;
- A **production centre** for many forms of audio and visual content, including for instance for radio, podcast/vodcast, television, social media, blogging, Websites etc.;
- A **broadcast and dissemination centre** for all media, including facilitating (see below) micro-community radio, that at the same time enables those at the peripheries to broadcast and disseminate.

The ethos would be participative and decentralising, enabling replication, synergies and resource-sharing throughout the community and beyond.

Given the scale of the Hubs and the resources required, it is expected that each would serve a relatively large area or population, that might in fact comprise several ‘communities’. For instance a community radio component could serve a part of that community; a community television another (or overlapping) part, and wider communities could be reached for instance with training but also by developing resources such as a virtual digital tools and content that can be utilised remotely in community initiatives for production and dissemination. The normalisation of remote meetings and training under the Covid 19 restrictions has enhanced the opportunities to reach communities in a decentralised manner online.

The Hubs will thus be centres of community learning, activism and creativity and an actual and virtual depot for tools and materials. They would draw on all forms of media and enable community members and groups to engage creative expression across numerous areas and promote community development through a variety of local organisations both community and statutory.

Such a fully developed, “bells & whistles”, Hub is described here to illustrate the breadth of possibilities available in principal to community media organisations, and is not presented as a goal to which all community media should aspire. Community radio and television channels have supporting initiatives in this direction for many years, taking on new roles and responsibilities and building bridges with local and sometimes national organisations. An organic growth process, coming from the community dynamic itself, is essential to underpinning a sustainable sector in the long-term. But an enabling regulatory and support environment can open new directions and lead to the expansion of existing ones.

A good example is media and digital literacy, where community media are already very active and have undertaken pioneering work over the years, often collaborating with educational institutions and other local organisations. Opportunities could open for multiple community media entities and their representative organisations, CRAOL and CTA, to work with national and regional organisations on this key issue, such as Aontas, Education and Training Boards, Libraries, Third Level Institutions, and the Department of Education. They could jointly develop pedagogical content and provide direct

educational support to many groups within the community, collaborating with, for instance, libraries, NGOs, schools and education centres.⁶

Having thus noted that the majority of community media organisations will always be spread along the continuum of community media possibilities rather than at its poles, there is a one responsibility proposed here specifically for the Community Media Hub, one that involves innovation also in media regulation: Under an agreement with the appropriate regulator/Commission, such Hubs could issue licenses, and ensure compliance, to community media outlets at the far end of the continuum: the Micro-Community Radio. Such a proposition, examined next, would at once both lessen the burden on regulators and release and expand the potential for local creativity.

Micro-community radio

The concept of the **micro-community FM radio**⁷ aims to make it extremely easy to establish a small-scale radio station, covering no more than a few streets or a village, or a small community of interest; through short-term on-demand licenses available directly from the associated Community Media Hub. These would be established by local organisations such as youth clubs and education institutions, and other organisations with social development goals, who would also receive the training and support needed. It would be a level below the existing temporary or special event licenses, and might replace some of them. They could even be supplied as needed with a “radio in a suitcase”⁸ to enable broadcasting to a small area.

It is worth recalling that a strategic priority of the BAI is to “encourage creativity and innovation as distinctive features of the Irish audio-visual sector” and further, to “ensure an increased focus on creativity and innovation across all BAI activities.”⁹ Extending the continuum of community media as outlined here, and enabling Community Media Hubs themselves to issue and ensure compliance with the micro-licenses, both constitute such innovative approaches to regulation. But they are also aimed precisely at enhancing innovation and creativity among communities and individuals, enabling the sector to achieve more of its potential.

5 Funding and Support

Existing sources

Recognising the social benefit generated by community media is an acknowledgement that it merits public funding, and several bodies do already provide funding and support.

⁶ An innovative example of reaching out to a particular community, women leaving prison, is described in an article: “What I Know Now: Radio as a means of empowerment for women of lived prison experience”, Anderson, H., and Bedford, C., in *Journal of Alternative & Community media* Vol 2, Issue 1, 2017 pp. 14-27 (available Open Access at: <https://www.intellectbooks.com/journal-of-alternative-community-media>)

⁷ Although the FM band is the simplest and usually the cheapest to broadcast on, there is also a lot of unused AM spectrum currently that might be appropriate for some communities of interest, and even small-scale DAB (Digital Audio Broadcast) could be considered.

⁸ The “radio in a suitcase” idea was promoted by UNESCO and others as a means for small community stations to establish themselves at low cost, especially in rural towns and villages. Everything needed to broadcast can be contained in a single suitcase.

⁹ Broadcasting Services Strategy, BAI, 2018. <https://www.bai.ie/en/consultations/draft-broadcasting-services-strategy-bss/>

The Sound and Vision 3 scheme funds the production of innovative content for both community television and radio, though these stations find themselves competing with commercial and public service media (as well as with each other) whose goals and resources are very different. The amount granted in Round 34 in April 2020, divided among 20 community radio stations and two community television stations, was €400,625, or 5.7% of the €7.02 million total.

Sound & Vision 4 saw the introduction of a Community Radio Fund in 2020 on a pilot basis for two years. The total amount for the 15 community stations and five community of interest/special interest stations was €750,000. Community Television, for the moment, remains within the general Sound and Vision scheme.

The inability to support a contribution towards core funding, from staff and office costs through to insurance (which can be high for radio) and transmission, especially for community television,¹⁰ has been a major source of criticism of the Sound and Vision scheme since its inception. Unlike its commercial and public service counterparts, the former with advertising and the latter with both the license fee and advertising, the community media sector cannot count on any source of income to contribute to core costs. Its refusal to produce content that maximises advertising - which would run directly counter to its core values and objectives – restricts that option, and despite lobbying over the years it has no direct allocation under the license fee. Stricter enforcement of Sound and Vision conditions has also closed off the small contribution that it had in the past indirectly made to certain overheads.

The BAI also offers small grants under the Community Broadcasting Support Scheme (CBSS), to both community radio and television. It helps build capacities through practical training and focused research activities, and grants amounted to about €30,000 in 2019. The Training & Development fund supports sector networking and development through their associations CRAOL and CTA, which amounting to about €130,000 in the same year.

Pobal also provides support, administering the Community Services Programme (CSP) for the Department of Community & Rural Development¹¹. The CSP is designed to support community businesses to provide local services and create employment opportunities for disadvantaged people. To some extent it offers a contribution to core funding to community radio stations, by funding the employment of a manager and a full-time equivalent position. However, while it is appreciated and indeed often essential, community radio stations and Pobal both acknowledge that it is not well suited to the community media sector due to its emphasis on creating sustainable employment within a social enterprise and the related requirement of generating a significant volume of external income. Community media rely primarily on voluntary effort and, like other community development bodies, can generate at most a modest income from their core work; being obliged to generate income elsewhere can divert them from achieving their core objectives.

¹⁰ A detailed breakdown was provided to this review process by the two licensed stations. The approximate cost of scheduling and transmission alone (the minimum expectations of a license holder) for a community television station is estimated by the two stations at €50,000, to include a part-time scheduler and coordinator and technical and other costs. Community television does not receive funding under Pobal's CSP scheme, and there is no obvious source to contribute to core staff or other ongoing costs.

¹¹ See Community Supports strategy: <https://www.gov.ie/en/policy/d5adb8-community-supports/#community-supports>

A small number of stations also receive a Community Employment (CE) grant from the Department of Social Protection. The CE programme is intended to assist individuals in long-term unemployment to get back to work. As well as thus being restricted in terms of who it can employ, its duration is for a maximum of 12 months.

Some community media organisations, both radio and television, have succeeded in attracting other funding, under different government schemes and from local authorities. But the BAI and Pobal are the mainstays of the sector, especially radio. They do not coordinate their support and have emerged from very different contexts.

Proposals for funding

It is understandable that the BAI, which is responsible for regulating broadcasting, should hesitate to offer funding to a media sector in so far as its activities are directed towards community development, an area in which it has no statutory responsibility. Broadcasting media content is just one of several means that the sector deploys to achieve this end, and not always the most important. Thus the BAI focuses most of its funding on programme production and a small amount for general capacity building and development. In a similar vein, The CSP scheme is administered by Pobal on behalf of the Department of Community & Rural Development, as part of the *Business, Training and Education* component of community development policy. The specific source of funding constrains what it can be used for.¹²

However, it may be timely to reconsider the best means to support this sector.

The BAI has a strong remit in the area of media literacy, under which support to a community media sector could be reinforced. Among its ancillary functions is: “the promotion of media literacy, including co-operation with broadcasters, educationalists and others” (Article 26(2)(g) 2009 Broadcasting Act); and granting funds for “new television or sound broadcasting programmes to improve adult or media literacy” is explicitly included (Article 154(1)(b)).

The Pobal CSP programme is also in the process of being revised, and is no longer taking in new projects. The License fee is also likely to be replaced, although this need not necessarily affect how the Sound and Vision scheme operates.

A potential further source of funding could derive from a levy the government is entitled to collect from on-demand media service providers in Ireland, under the EU’s AVMS Directive (Article 13 Directive 2018/1808). The Directive specifies that there must be “secure at least a 30% share of European works in their on-demand catalogues of and ensure the prominence of these works”; but they may also require that such service providers to make financial contributions that are “proportionate and non-discriminatory”¹³. The AVMSD provides for mandatory exemptions for low-turnover or low-audience media entities, which would include community media. Part of this could be specifically earmarked for the support of several Community Media Hubs.

A strong rationale exists for directing the proceeds of such a levy towards Community Media Hubs. Such hubs are working directly in a multi-platform, multi-media environment, and will be generating

¹² <https://www.gov.ie/en/policy/d5adb8-community-supports/#business-training-and-education>

¹³ For a detailed discussion see: *Communication from the Commission: Guidelines pursuant to Article 13(7) of the Audiovisual Media Services Directive on the calculation of the share of European works in on-demand catalogues and on the definition of low audience and low turnover* (2020/C 223/03). [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020XC0707\(03\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020XC0707(03))

content for communities to download on demand. Indeed, these hubs might themselves be included in the list of on demand media service providers (which must be drawn up by each EU country), reinforcing their case for benefiting from such a levy.

Overall, then, there exist a number of future possibilities of refining existing sources of finance for the sector and of identifying new ones.

Whatever the source of finance, however, a key question relates to form and delivery of that support. The most efficient and cost effective means to provide support to the sector may be through the creation of a consolidated **Community Media Support Fund** that can draw on and combine the resources from several sources, the BAI, relevant government Departments and possibly the on-demand levy, into a single fund. This would be coordinated by a single lead entity, who could manage the disbursement side of it.

The coordinating entity would work in close collaboration with the community media sector organisations themselves, ensuring they target real in needs in the most effect and efficient ways possible, and that the investment generates the great possible return in terms of both social benefit and sustainability of the sector. Different elements of such a Fund, taking into account the different needs of different types of community media, would make a contribution towards core funding, community training and support, content production, digital literacy and other areas. .

Supporting Access and 'findability'

A further point in terms of support can be added.

Currently, securing a radio license under Section 64 of the Broadcasting Act (2009) enables the community to gain access to the content produced – they must merely tune in to that station. A community television channel licensed under Article 72 also offers a certain, though more limited, degree of access to the community served. Under Article 76 the BAI can oblige the cable network provider to carry community television content, at no cost.

Since the 2009 Act, the issue of access has moved considerably with the emergence of on-demand services and platform neutrality, and the growth and maturing of Saorview's DTT (digital terrestrial television) offering. With cable television, for instance, the positioning of the station on the EPG (Electronic Programme Guide) was, and remains, critical - though community television never succeeded in asserting its prominence. Internet-based on-demand services now add a new, and even more prominent layer, to accessing television content, overlaid on top of both satellite and cable and built into new televisions. And access to DTT radio and television, including DAB, is regulated by Comreg as a commercial service, and currently priced (and regulated) beyond the community sector's means. In radio, podcasts and blogs have developed their own momentum and access routes, often backed by major investors and media enterprises.

Community media providers have made considerable efforts in keeping up with, and taking advantage of, these developments. Yet they lack the huge investment finance of the commercial operators, most of whom operate at a global scale, and the resources and political clout of the public service providers. The BAI, as well as in certain respects Comreg, will have opportunities to ensure that accessing community media content does not suffer from further disadvantages in terms prominence and 'findability' by their communities, and these should be fully explored and exploited working with the sector.

Annex 1: CTA Charter for Community Television (2011)

The following Charter was developed by the Community Television Association in consultation with the sector in 2011.

Preamble	<p>Recognising that:</p> <ul style="list-style-type: none"> the Right to Communicate goes beyond freedom of expression and embraces everyone’s right to equitable access to the means of expression, to create and disseminate their own media, and to communicate freely with others democratisation of media structures is central to achieving social justice, and to generating and disseminating the knowledge and political and cultural understanding essential to global sustainability; <p>Believing that Community television can:</p> <ul style="list-style-type: none"> utilise media and communication as tools for progressive social change through the liberation, empowerment and enrichment of all people and communities, but particularly those that are disadvantaged or excluded contribute to social and digital inclusion especially of minority voices, women, children, the poor and those marginalised from traditional mainstream television facilitate the emergence of individual and collective identities that are diverse, honest, open and tolerant Contribute to offsetting the growing concentration and centralisation of commercial media ownership Advance the vital efforts of people and communities in bringing democracy, participation and transparency to rapidly changing media structures and activities of media agents <p>this Charter for community television in Ireland affirms that we pursue the following common ideals, objectives and activities:</p>
	<p>Community Television:</p>
What it is	<ol style="list-style-type: none"> is made in the process of the community itself, is part of that community, and relates to people’s lived lives is a form of active and reflexive citizenship connecting and empowering communities and people through shared programme production, dissemination and use is an expression of ‘localism’, of being located in and identifying with a community of place or of interest; while linking to global communities and recognising the essential mutual interaction between the local and the global necessarily engages both with television production as an empowering process in the community, and with television viewing as a creative, enjoyable and educational process, potentially motivating critical reflection and action is a growing and vibrant part of the media landscape in Ireland, reinforcing progressive media trends in politics, society and culture.
What it does	<ol style="list-style-type: none"> enriches media content diversity by amplifying marginalised, dissenting and critical voices and ideas, and by challenging the views and legitimacy of the powerful broadens media ownership and control structures, beyond private sector, governments, and public service channels to people and communities themselves enhances creativity, linguistic and cultural diversity and social cohesion by giving a means of expression and communication to all people and communities

	<ol style="list-style-type: none"> 9. encourages participation by treating its viewers not as passive consumers of media commodities, but as actually or potentially active, engaged and critical actors in their lives, communities and society 10. develops new, innovative and creative ways of democratising decision-making and control and, producing programme material by participatory means, where the processes involved are paramount.
	We, as Community Television practitioners:
Who and what we are	<ol style="list-style-type: none"> 11. comprise television channels and others engaged in wide public distribution and broadcasting of programmes made by communities; as well as the individuals and groups producing these 12. operate not-for-profit non-governmental entities whose primary goal is to serve the interests of communities 13. are editorially independent of government, commercial and religious institutions and political parties 14. organise as open, accessible, democratic, and participative entities, offering multiple means for people and communities to participate 15. pursue management, programming and employment policies and practices that are transparent, non-discriminatory and accountable 16. seek to have ownership and control representative of specific communities or place or of interest
What we do	<ol style="list-style-type: none"> 17. facilitate people and groups to make programmes that challenge injustice, stimulate critical thinking, and educate and entertain in ways that encourage creative reflection and expression 18. disseminate them through all available channels: broadcasting, internet, cable, DVDs, community events and others, striving to make them accessible - including to those with disability - and affordable to all 19. actively support the evolution of new forms of media and new modes of production based on collaborative, open and shared projects; including material that not only empowers those engaged in its production but contribute to an emerging global sense of media commons 20. provide equitable access to training, production and dissemination facilities, thus encouraging creativity and enabling responses to community and individual needs 21. promote media literacy and critical reflection through training, production, programmes and other activities 22. reinforce independence by seeking resources and finance from a diversity of sources including especially from our communities 23. seek to redefine constructively the relationship of media to audience and critically examine the role of advertising and sponsorship in shaping media and audiences 24. encourage and value volunteers and activists, and seek to create paid employment and develop the craft of media production in satisfactory working and employment accessible to all 25. foster exchanges and cooperation between each other, including sharing of content, skills and materials, and act together to promote our ideals and practices 26. seek out, collaborate and act in solidarity with others working to achieve similar ideals, in Ireland, in Europe and globally.

BAI Policy on Community media

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BAI Policy on Community Media

Introduction

This document is intended to inform interested parties nationally and internationally about BAI policy in relation to community and community of interest media in Ireland. The Irish experience has demonstrated that community media can make a significant contribution to the overall media landscape. It also shows that realising this potential requires a substantial level of ongoing commitment and support from relevant support agencies and from the communities served.

This document is divided into the following sections:-

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

1. Defining Community Media

Several decades of Irish experience of community media affirms the sector's wider global tradition. Community media, as they first emerged in communities and are practiced around the world today and linked through international associations such as AMARC, are deeply rooted in democratic, participative and empowering traditions.¹⁴ Building on Article 19 of the Universal Declaration of Human Rights, community media aspire to the right to communicate.¹⁵ 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 sustainability.¹⁶

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 regulator 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 *Section 72 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 BCI, 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, 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.

¹⁴ 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>.

¹⁵ 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.

¹⁶ Background on the right to communicate is available here: <https://ccrvoices.org/background-on-communication-rights/>

Reflecting this 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 Ireland 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 recognises that as the community media sector develops in the new media environment, individual media organisations may be located along a continuum, and that activity or activities requiring a license may co-exist alongside many others.

At one of the continuum, and emerging in Ireland already, are Community Media Hubs. These hubs work with their communities on licensed media services, radio, television and on-demand; and alongside these may offer training in digital media, build media literacy in schools and elsewhere, and collaborate with local voluntary organisations and public bodies such as libraries and education institutions. At another end of the continuum might be micro-community radio, creative and experimental 'pop-up' community media organisations led by local youth clubs, senior citizen groups, disability support groups, and so forth. In between there can exist a variety of combinations to suit the resources and needs of different communities.

The Authority also uses the following three criteria in assessing the 'community nature' of relevant organisations and groups. Therefore 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.

2 Social Benefit

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 in 2019/2020 supported the design and development of a Framework for Assessing the Social Benefit of Community Media¹⁷. The definition of social benefit included in that 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 generated.¹⁸

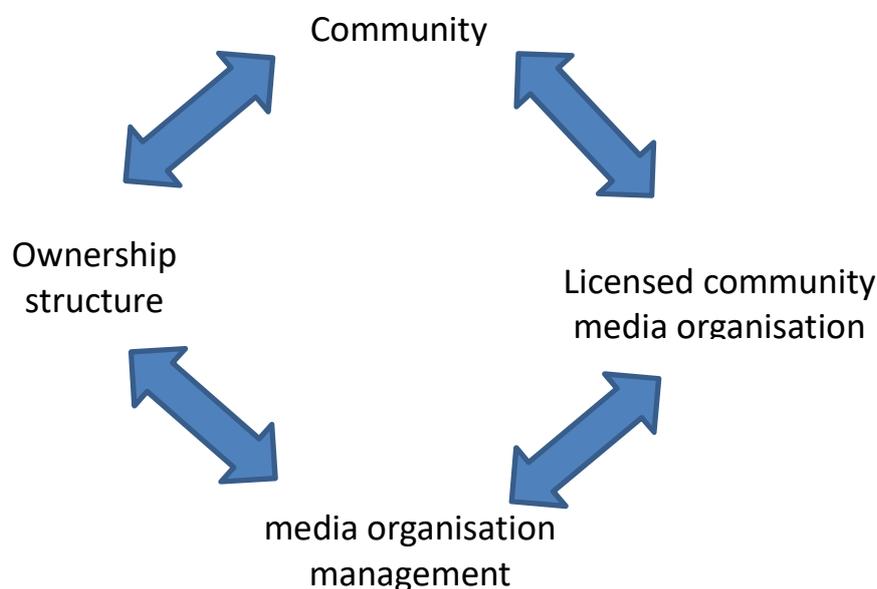
This concept of social benefit is widely endorsed by the licensed community media sector, both radio and television, and is being applied in practice by the BAI for instance in assessing the applications for support under the Sound & Vision 4 scheme.

¹⁷ https://www.bai.ie/en/media/sites/2/dlm_uploads/2020/06/Community-Radio-Delivering-Social-Benefit-.pdf

¹⁸ https://www.bai.ie/en/?attachment_id=134923 Give reference

3. Ownership and Management Structures

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 that 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:



In the ideal situation, the community served participates at all levels. The organisation 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.

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 Authority acknowledges that the definition of community media outlined in section one allows for some degree of flexibility in relation to ownership. This is applicable only in instances where the ability of the

community to exercise effective control over the organisation is not unduly weakened. While having ownership vested in the community served is, undoubtedly, the best way to guarantee this, ownership and control are not inseparable.

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. This applies at all levels of the ownership and management structures. 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. The BAI has played an active role in this area and will continue to place an emphasis on ensuring the community media sector can be a model of best practice for the community sector more generally.

4. Funding and Finance

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 here, is potentially viable overall, funding individual media organisations, of very different natures and size, is an ongoing challenge for licensed groups 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 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 commercial activity will also remain a source of income for community media.

The Authority believes that a co-ordinated approach to funding the community media sector from relevant statutory sources should be seriously considered. This can be related to the types of social benefit that are generated by the sector, including for instance reinforcing the work of other community development organisations, and the actual and potential contribution to media and digital literacy.

While all licensed community media entities receive a degree of support from a variety of public sector sources, the need for a more focused approach to funding the community media sector is required. It is therefore the Authority's view, and the view of others within the sector, that the mechanism for this should be clearly defined, and that the associations representing community media should participate in the design of all aspects of these supports to ensure that such funds are targeted effectively and appropriately.

The Authority 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.

5. Staffing and Training

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 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.

However, the concept of a continuum of community media organisations encompasses a range of possibilities, from large hubs engaging in a multiplicity of activities and employing many people in different capacities, to temporary micro-radio stations entirely run by volunteers. The hub would reach out into the community, working with both community voluntary and public organisations, to actively promote areas such as media and digital literacy. Here the potential for supporting significantly more employment and volunteers emerges, based ultimately on the type and level of social benefit being generated.

The Authority 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 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.

6. Content

The Irish experience indicates that the development of a viable community media sector depends on the organisation providing a new and unique forum for communication between individuals and groups within the community served.

The definition of community media points to a continuum of possibilities of community media organisations, providing licensed services but some also a lot more. There is no limit to the nature and diversity of content that can be produced by community organisations – other than their capacity to generate social benefit for their communities –or of their means of dissemination and exchange. Media convergence can become a reality there.

As outlined earlier in this document, all such content production, dissemination and exchange should be based on community access and reflect the special interests and needs of the community it serves. The widest possible content accessibility to the community, actual and potential, is critical, and here such concepts as ensuring prominence and ‘findability’ across the platforms will play a key role. 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 and access that content easily in a rapidly evolving media landscape. The BAI believes that community media content that generates public benefit merits prominence as the media sector and technologies evolve, and that such content should be readily identifiable and accessible to the communities it serves.

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 understanding in support of peace, tolerance, democracy and development.*