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Cross-National Comparative Analysis of Community Radio Funding Schemes

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Introduction

Community radio programming is distinguished by its production, its content and its purposes. It is made by the community, for the community and is primarily about the community. This report is a comparative assessment of the programme production support scheme available to the community radio sector in Ireland and those deployed in a number of comparative national settings. The research project provides a description of Irish and International (Austria, Canada, Denmark, France and New Zealand) models for supporting programme production by community radio broadcasters. It also evaluates how different aspects of the various models contribute to the capacities and sustainability of the sector. The key motivation of the research is to assess how programme production schemes contribute to the development of the community radio sector in comparative jurisdictions and whether the developmental aspects of those schemes are potentially transferable to the Irish scheme.

Executive Summary

This research project was undertaken with the purpose of evaluating ways in which the programme production fund, Sound and Vision, may be adapted to contribute to the development and sustainability of the community radio sector in Ireland. The study involved a critical policy analysis of the Irish Sound and Vision Scheme as well as an international comparative analysis of funding schemes as organised in five other jurisdictions.

The research draws upon an understanding of 'development' as derived from the emerging literature produced by the international community media sector. Development infers both growth and sustainability (the ability to keep something going over time). Sustainability in community media production has social, institutional, financial and technological dimensions that need to be addressed in any proposed aspect of public support for community radio.

Whereas the Sound and Vision Scheme is broadly accepted as having had a beneficial impact on the community media sector in Ireland, concerns about the shortcomings of the schemes have also been voiced. Criticisms emerging in previous research relating to structural and procedural deficits of the scheme were re-stated in consultative seminars undertaken for the present research. In summary, the fund has been criticised for not taking into account the unique characteristics of community radio.

The project involved an international comparative analysis of programme production schemes with the purpose of identifying structures and procedures which may contribute to the growth and sustainability of the sector. The five jurisdictions that were selected for comparison were Austria, Canada, Denmark, France and New Zealand. The choice of schemes was shaped by the 'method of agreement' principle, which allows for the selection of varied national contexts (political culture and longevity of scheme, etc.) combined with the relative comparative nature of the policy under consideration.

The following table provides an overview of the key structural and procedural features of the varied production schemes identified in the research:

	France	New Zealand	Denmark	Austria	Canada	Ireland
Status of Fund	Dedicated	Generic	Dedicated	Dedicated	Dedicated	Generic
Source of Fund	Commercial Levy	State Grant	Licence Fee	Licence Fee	Commercial Levy	Licence Fee
Core V Project-Based	Core + Selective Grant	Core	Core Programming Grant	Project (Thematic)	Project (specified)	Project (specified)
Distribution	Tiered	Tiered	Licence linked	Capped funds	Open	Open
Capacity, Procedural and Quality objectives	C, P & Q	C & P	C	C, P & Q	C, P & Q	P & Q
Application cycle	Annual	Annual	Annual	Annual	Annual	Rolling

No two support models are the same. Given the varied economic, political and sociocultural contexts and the particular histories of broadcasting and the community dimension, different approaches to the support of programme production are observable. Added to this, each of the support models can be seen as evolutionary in terms of how it has developed over time in reaction to fundamental changes and emerging knowledge about the operation of the sector. However, the fundamental logic of the support schemes are comparable insofar as they recognise that programme production funds help to achieve the policy objectives surrounding community radio broadcasting, even as the objectives may vary in each jurisdiction.

The research identified three key consensual principles of funding related to development and sustainability of the community radio sector that were articulated by both community media representatives and broadcasting regulators interviewed for the research; that is, elements of each of these funds should attempt to realise the three key policy goals of ensuring

1. Predictability and sustainability of funding;
2. Attention to capacity building, content production and community media production procedure within funding; and
3. Transparency, efficiency and fairness combined with flexibility in the procedural elements.

It also identified a composite of structural and procedural features arising from the five funds analysed that provide guidelines to how these principles may be best institutionalised (thus leading to growth and sustainability).

There are structural dynamics of funding schemes which address the key policy issues faced by the sector as well as ensuring sustainability along the lines of social, institutional, financial and technical dynamics. The following are some structural dimensions that fulfil the policy principles outlined above:

- Dedicated funding schemes for community media;
- The availability of operational funding (France) or, alternatively,
  - Operational funding for determined programme hours as opposed to 'specific projects' (Denmark)
  - Funding for generic programme strands as opposed to defined 'stock' programming (Austria);
- Ring-fenced 'radio' funding (Austria, Canada and France); and
- Funding based on successful retention of a service licence in conjunction with project proposals (Austria, Denmark, France, New Zealand).

The research also addressed procedural aspects of each of the funding schemes. The broadly positive procedural aspects of each of the funding schemes were as follows:

- Annual funding rounds with potential for multi-annual funding (New Zealand);
- Streamlined application process/clarity of criteria/independent but public judging panels (Canada, France, Denmark);

- Varied hybrids of content, procedural and operational award criteria (Canada, Austria, France);
- Operational and content monitoring linked to political legitimation of guaranteed grants (Denmark, New Zealand, France); and
- Measured spread of funds across the sector (France, New Zealand).

In conclusion, the research pointed to three emerging policy issues that should be considered by policymakers and regulators concerned with the future development and sustainability of the sector, i.e.,

- Generating appropriate metrics for measuring outcomes as well as output of funding for community media;
- Developing flexibility of funding for different broadcasters with different needs; and
- Allowing for the funding of planning/production costs associated with technological change in an evolving media environment.

Glossary

ACAB	Association of Community Access Broadcasters (New Zealand)
AMARC	World Association of Community Radio Broadcasters
ARC	l'Alliance des radios communautaires du Canada
ARCQ	Association des Radiodiffuseurs Communitaire du Quebec
BAI	Broadcasting Authority of Ireland (Irish broadcasting regulator since 2009)
BCI	Broadcasting Commission of Ireland. Irish broadcasting regulator (2001-2009)
CBC	Canadian Broadcasting Corporation
CBSS	Community Broadcasting Support Scheme (BAI, Ireland)
CCD	Canadian Content Development Fund
CIMA	Centre for International Media Assistance
CMA	Community Media Association (Community radio representative body UK)
CMFE	Community Media Forum of Europe
Craol	Community radio representative body, Ireland.
CRTC	Canadian Radio and Television Commission (Canadian broadcasting regulator)
CRFC	Community Radio Fund of Canada (community radio funding agency)
CSA	Conseil Superior de la Audiovisuel (broadcasting regulator France)
CTA	Community Television Association (Ireland)
FÁS	Irish national training and employment agency

Forum on Broadcasting: ad hoc committee set up to evaluate broadcasting policy in Ireland 2002

FSER	Fund for Sustainable Radiophonic Expression (French community radio fund)
IRTC	Irish Radio and Television Commission (Irish broadcasting regulator 1988-2001)
JNLR	Joint National Listenership Research Ireland

KommAustria: Communication regulator, Austria

NCCRA National Campus and Community Radio Association (Canada)

NZOA New Zealand on Air (government mandated television and radio funding agency)

Pobal Irish state agency involved in social inclusion and community partnership projects

RTB Radio and Television Board (Danish national radio and television board)

RTR Rundfunk & Telecom Regulierungs, (limited liability company fully owed by the Federal Government and created to be the operational support for KommAustria, the Austrian broadcasting regulator)

SLRTV Sammenslutningen af lokale radio- og TV-stationer i Danmark (Community radio and television representative association Denmark)

SNRL Syndicat National Des Radios Libres (community radio representative body, France)

VFRO Verband Freier Radios Oesterreich (community radio representative association, Austria

Chapter One – Background and Methodology

Contexts

Community radio in Ireland has developed in the context of the emergence of a wider community development and community arts movement, with a strong anti-poverty and social inclusion focus. The continued development and sustainability of community broadcasting itself are core issues for the sector. With no access to JNLR figures or traditional modes of measuring audiences, and an entirely different set of objectives[1] to commercial radio, community broadcasting in Ireland relies on a variety of different funding mechanisms and programmes in order to exist. These include a mix of government grants, local fundraising, as well as some advertising and sponsorship. The legislation for a broadcasting funding scheme in 2003 and its later development as the Sound and Vision scheme by the BCI has proved a significant contribution to programme production by the sector.

Over the past five years the community radio sector in Ireland has managed to draw down significant funding through the Sound and Vision Scheme. In the 2009 Broadcasting Act, the funds available for this scheme increased and the Broadcasting Authority of Ireland (BAI) was, in preparing a scheme, to 'have regard to the development needs of community broadcasters'.[2] It is thus both timely and beneficial to consider how the programme funding scheme has performed in its support and development of the sector thus far and assess different but comparable models for achieving developmental objectives in other jurisdictions.

Based on a critical policy analysis of the current situation in Ireland and comparative international research, this research project assesses varied 'programme-making support funds' and their implications for the work, capacities and sustainability of community media in different national contexts. The core objective of this research project is to document the models for programme-making support in comparable jurisdictions, how they potentially contribute to the development

[1] http://wiki.amarc.org/index2.php?topic=community_radio_charter_for_europe&lang=EN&style=amarc&site=amarc, [Accessed 02/12/10].
[2] Broadcasting Act, 2009, Ireland.

of the community radio sector and evaluate what lessons they may have for adapting progressive policy to the Irish scheme.

Research Design, Methodology and Methods

The research project integrates a variety of approaches with the aim of mapping and analysing the strengths and weaknesses of current programme-making support schemes and their implications/potential for the sustainability of community radio. The research aim demanded that the research design employ a variety of integrated approaches and a degree of reflective flexibility in the research design. The research project is composed of two strands:

- An analysis of the current model for programme production support in Ireland (legislation and policy)
- A comparative analysis of other international models aimed at translating models, policy solutions and debates into this context.

The research thus involved a situational analysis of the policy that informs the Irish programme funding scheme, Sound and Vision, and how it relates to the development of community broadcasters in Ireland. Analysis of the Irish programme production scheme drew upon qualitative methods of document data gathering (from existing policy resources), a consultative analysis with the community radio sector itself, and access to prior research carried out by both Craol (the Irish community radio representative body) and the BAI.

The second strand consisted primarily of a cross-national comparative analysis of programme production support models as they are operated by state mandated agencies in a number of jurisdictions. The research drew upon an analysis of the relevant legislation/policy in the jurisdictions of Austria, Canada, Denmark, France and New Zealand. The data/evidence consisted of policy, regulatory and legislative documents related to the programme production support schemes in these national contexts and in-depth interviews with regulatory officials and representatives of the community media sector. The research sought to determine similarities and differences in the policy/legislation and gather evidence of the efficacy of these measures from relevant stakeholders such as policymakers, community media practitioners and academic commentators. The international analysis was prefaced by a consultative research seminar with the Community Media Forum of Europe (CMFE) for further contextualisation, clarification and consideration of international models.

The initial phase of the research consisted of desk-based data gathering of the documentary data via web, e-mail and interview. The legislative data was then compiled to give an understanding as to how the programme production funding scheme for community broadcasters is structured, organised and defined.

All of the states selected are comparative on the basis that broadcasting authorities fund or mandate programme-making support mechanisms, which are drawn upon by a community radio sector, which is similar in its institutional design to Ireland. The rationale behind the final sample was to provide a degree of contextual variance in relation to the jurisdictions that have been selected whilst ensuring that the schemes bear up to comparison.[3] This critical comparative analysis thus provides models, policy approaches, and policy questions which are varied but not irrelevant to the Irish context. Further research took the form of additional document research and targeted interviews with community media practitioners and community media researchers.

All of the selected jurisdictions fall within the parameters of the research question and are comparable to Ireland insofar as they all have programme production support schemes administered/mandated by state funded broadcasting bodies to which the community sector can apply, wherein the institutional make up of the community sector is comparable to that which exists in Ireland.

Evaluation of the structure and performance of support schemes in the five jurisdictions selected was achieved through documentary research and semi-structured one-to-one interviewing. The jurisdictional reviews included:

[3] The selection of the five countries for review was based on the 'method of agreement' principle wherein the policy approaches being considered from the other jurisdictions are comparable to the Irish situation but the contexts are different.

- An overview of legislation informing the programme support scheme;
- An analysis of the policy objectives which shape the interpretation of the programme production support scheme;
- In-depth interview with the policymakers and officials who have designed and administered the schemes;
- In-depth interviews with the key stakeholders such as community media associations and community media practitioners with experience of the scheme;
- Consultation with media researchers with expertise in this area; and
- Press, academic and specialist sector publications on the topic.

The key objective of this data gathering was to establish the legislative, policy and financial arrangements that exist for community radio programme production funding. A further objective was to sample the experience of administering the schemes by the relevant policy bodies and the experiences of those utilising the schemes, the stakeholders. The key question of how these schemes aspire to support programme making in the community sector is addressed through these policy analyses:

- What models exist for providing programme production support which may support the development of the community sector to deliver community programming?
- How are the capacities of the overall sector developed through the objectives, procedures and structure of these schemes?
- What is their applicability in the Irish scenario?

It is acknowledged that a key component of measuring the developmental aspects of these schemes, as they actually operate, would need to have engaged in in-depth research into the knowledge and experience of community radio stations, associations, staff, volunteers and accesses as well as developing metrics for gauging the growth and sustainability of an overall sector over a given period of time. For this reason the boundaries of the research must be recognised as it is a mapping exercise of varied production schemes, their implications for community radio stations and their perceived developmental performance according to both regulators and community radio representatives in those jurisdictions. The hope is that it will be a small contribution to the larger research challenge of a cross-national evaluation of the contribution of public policy to the development of the sector.

Structure of the report

Chapter Two provides an overview of previous academic and administrative research which is relevant to the present research question. It describes and evaluates a number of comparative research reports which provide descriptive accounts of the general institutional and funding scenarios in a number of different jurisdictions. The chapter also reviews the existing community media literature which attempts to map the relationship between policy, funding, programme making and development of the sector. The chapter provides an evaluation of how sustainability and development are interlinked, how sustainability may be achieved in the sector and how programme production schemes may support this.

Chapter Three provides a detailed overview of the Sound and Vision production scheme that is available to the community radio sector in Ireland. It describes the structure of the fund, how it is administered and the criteria for applications to the fund. It also provides an overview of the community radio sector in Ireland, its development, its structure and its finances and how the community radio sector in Ireland evaluates the present fund.

Chapter Four and Chapter Five compare and contrast models of funding for community radio programme production, by government mandated funding bodies, in a number of comparative jurisdictions. The comparative analysis examines the similarities and differences in five other jurisdictions[4], with particular attention to how programme-making support schemes for community broadcasters are defined, structured and organised and how their constituent elements may be considered as developmental. The comparative sample includes Austria, Canada, Denmark, France, and New Zealand, whereas secondary reference is made to Switzerland, Belgium and the USA, where relevant.

[4] Initial sample included Austria, Belgium, Canada, Denmark, France, New Zealand, Switzerland and the US. These countries are broadly comparable in relation to the development of community radio within the overall broadcasting system relative to policy, funding and organisation. In more general terms these are all identifiable as western media systems and therefore display salient and comparable characteristics relevant to their historical development, political economic contexts and political system variables.

The concluding chapter considers which potential developmental elements of the various production funds may be usefully adopted or adapted as policy in Ireland. Sensitive to the contextual differences in the various support schemes it will consider how the principles, structure and procedure behind particular aspects of each of the schemes may be beneficially incorporated into the Irish scheme.

The project thus examines the current legislative basis for supporting community programme making in multiple jurisdictions and how the criteria for subsidy for programming for community broadcasters may (or may not) address issues of sustainability and development (capacity building) in community broadcasting. It will relate these comparative schemes to the funding scheme available to the community radio sector in Ireland and consider the potential policy transfers.

Chapter Two – Policy, Funding and Development of Community Media

The central research question is concerned with evaluating existing models for community radio programme production and development of the sector. How can funded production schemes best contribute to the development of the sector? This chapter will first review the existing literature in relation to comparative models of production funding. Following this, it will consider some of the emergent literature on public policy and community media support. It is then necessary to survey the literature for tentative criteria for adjudging what is 'development' in the community media sector and what public funding criteria may best contribute to developmental goals within the sector.

International studies of public funding for community radio programme production

A survey of the international scholarly literature indicates that comparative analysis of support mechanisms for community broadcasting programme making has not received extensive treatment. The relationship between programme production funds and development of the sector has received even less attention. Isolated studies[5] have been conducted in other European countries which have attempted to examine the impact of public subsidies on non-commercial broadcasters, but, to date, no extensive comparative analysis has taken place. This is not in itself surprising, as scholarly work on community media within the wider field of media studies tends to be somewhat under developed.

There is, however, a growing literature from policy and associational bodies relevant to community media that has begun to document the institutional characteristics of the sector across national contexts and the place of programme-making support models therein. In 2001, Tacchi and Price-Davies published a comparative study of community media, which was undertaken as a

[5] Jauert, P. and Prehn, O. (2003) 'The Danish subsidy scheme for non-commercial radio stations' in *Javnost - the Public*, Vol 10, No 1 .

fact finding report for the development of the community media sector in the UK.[6] It provides details on the legislative and funding mechanisms of six jurisdictions. The report is relatively scant on the details of programme production support schemes but provides a useful overview of funding bases for community media in the six jurisdictions. A 2006 National Campus and Community Radio Association report 'on community radio support in other jurisdictions' details the funding situation in Australia, Ireland, the UK, France, the US, the Netherlands and New Zealand.[7] The report provides an overview of these jurisdictions and notes the existence of national government mandated support schemes for community radio. The report is useful insofar as it differentiates types of support mechanisms for community broadcasters. In its survey it points to the operation of three types of support model i) a direct station operational subsidy, ii) targeted support for specific station operations (including programming production and distribution, staff training and capacity building, and transmission and production equipment) and iii) a combination of the two.

This highlights the basic structural differences of varied national programme production funds. Operational, or 'core' funds as they are more commonly known, are annual bulk funds which are designed to provide broadcasters with a proportion of their station maintenance and programme production costs. Core funding is usually directed towards supporting fundraising awareness, management, administration, financial management and reporting, content production, training, technological planning, community outreach and volunteer organisation and research. The rationale is that funding stations and their operations will enable the capacity for the production of community radio programmes on an ongoing basis leading to greater output from funding over time. Project funds/schemes tend to be targeted funds which support particular elements of community radio, e.g., once-off training initiatives, once-off programme production grants, once-off station enhancement grants, etc. In relation to programme production, stations are funded to produce an agreed programme or set of programmes and the funding is entirely directed towards the production costs of that agreed programme. The rationale is that it allows community broadcasters to produce quality programmes, encourages efficiencies in all strands of programme production and leads to demonstrable outputs from public funding. In relation to the

[6] Tacchi, J. and Price-Davies, E. (2001) *A comparative study of community radio: designing a model for access radio in the UK,* London: CMA.
[7] Stevenson, J.H. (2006) *Community radio support in other jurisdictions*, NCCRA/ANREC.

third type of fund, this points to the potential cross-over of funds wherein both core operational and project funds are somehow combined in a single funding scheme. None of the existing sector reports provide enough detail to describe how this is put into practice.

In 2008, Peissl and Tremetzberger published a piece of research commissioned by the Austrian Broadcasting regulator, the RTR, which compares the legal and economic framework of the community media radio sector in five European jurisdictions.[8] It is more specific on issues of programme production support schemes and programme-making initiatives within those jurisdictions and is thus an important reference for the present research. Most recently, in 2009, Connectus Consulting completed research for the Canadian broadcasting regulator, the CRTC, on 'International Approaches to Funding Community and Campus Radio'.[9] It provides an overview of 12 western jurisdictions and acknowledges the role of broadcasting authorities in developing support schemes for the programme-making capacity of the broadcasting sector.

None of these reports go into particular detail of programme production fund support and do not consider the relationship between production support and development of the sector. However, they are all useful for providing contexts for programme support schemes within wider economic and legislative frameworks and have provided useful information for the description of comparative jurisdictions. The core details are condensed into the table below:

[8] Peissl, H., and Tremetzberger, O. (2008) *Community Media in Europe: the legal and economic framework of the third audiovisual sector in the UK, Netherlands, Switzerland, Germany and Ireland*, Vienna: RTR.
[9] Connectus Consulting (2009) International approaches to funding community and campus radio: a report for the CRTC, CRTC.

Table 2.1 – Overview of funding models in ten jurisdictions

Country	Programme Funding Body	Disbursement	Funding	Community Radio Sector Features
Austria	RTR : Austrian Broadcasting Regulator	Grants for programming and programme production capacity building	Funds derived from a percentage of the broadcasting licence fee	Legislatively recognised as non-commercial media and station-centred structure
Belgium	Ministere de la Communautae Francais: Government Department	Specific funding for French language media programming (Fond de l'aide de creation radiophonique)	Fund derived from a percentage of the broadcasting licence fee	Defined as 'independent' radio. Institutional variance across linguistic communities
Canada	Community Radio Fund of Canada: Created by Community Radio Associations and certified by CRTC	Grants which support capacity-building in programme production	Fund derived from contributions and fundraising and a baseline CRTC contribution mechanism	Defined as CM and mostly station-centred.
Denmark	RTB: National Radio and TV board (Media Secretariat)	Subsidies for programme hours per week as opposed to specific genres	Licence fee derived	Legislatively recognised as CM. Combination of 'Access' and 'Station' model
France	Fund for Sustainable Radiophonic Expression (FSER)	Core funding and additional grants for community radio stations	Fund sourced from a levy on commercial broadcasters	Recognised in legislation and structured around community radio stations
Germany	LMA: Landers Media Authorities	Distributes programming funds for media literacy initiatives	Derived from a portion of the licence fee and varies in each LMA	Legislatively recognised as CM and 'Station' model. Variable features in each lander
New Zealand	New Zealand on Air: purpose built Crown entity for funding programming (semi-state body)	Funds distributed for non-commercial programming under specific programme themes	Funds derived from central government grants	Legislatively recognised as CM. Combination of 'Access' and 'Station' model
Switzerland	Federal Office for Communications (Ofcom)	Funds distributed to CR for specific projects on the basis of CR raising matching funds	Fund derived from portion of the reception fee	Defined as complementary stations. Combination of 'Access' and 'Station' model
USA	Corporation for Public Broadcasting: Private non-profit corporation created by congress.	Distributes funds for specific programming initiatives. Mainly funds public radio but CR can apply.	Funds derived from central government annual grant	Defined as non commercial radio. Combination of 'Access' and 'Station' model

In the community media literature the particular arrangements for funding for programme production have yet to receive significant attention. Instead, funds for programme production tend to be considered as an element within the wider category of state or public funding. The potential of sustained financing for either programme making or station development are recognised as key means of ensuring sustainability and development on the basis of ability to plan for the long term, but an evaluation of how production funds are structured and operated has received scant attention. One of the core purposes of the present research is to provide comparative detail of these funds and their constituent elements.

Public policy, public funding and the community media sector

The implications of public policy for the structure, behaviour and content of community media sectors entails the necessity of careful policy design. Policy towards the community media sector requires differential approaches to the policy directed towards the public service sector and the commercial sector. In their development of a public interest agenda for broadcasting policy, Buckley[10] et al. point to the necessity of this differentiation:

> Community broadcasting should be recognized in law as a distinct type of broadcasting to be supported and encouraged through specific and explicit licensing arrangements that guarantee fair and equitable access to radio spectrum and to economic resources (Buckley, 2008, p. 209).

The authors go on to state that policy directed towards community and radio broadcasting should be mindful that community media should,

- Remain independent of the government and of commercial organisations;
- Serve specific communities, either geographical or communities of interest;
- Have ownership and management representative of that community;
- Operate for purposes of social benefit rather than private financial profit; and
- Enable participation by the community in program making and management (Buckley et al., 2008, p. 222).

[10] Buckley et al. (2008) *Broadcasting Voice and Accountability,*(Michigan: University of Michigan Press).

The relationship between policy and funding is succinctly stated wherein funding, which includes government or public funding, should be just one element in a wider matrix of funds including advertising, sponsorship, membership fees and donations. However, public funding can be a strategically important element of the funding mix as it offers a potentially more stable and predictable source of funding. According to Buckley et al., community media should have the potential to access sources of public funding to ensure both the mix and security of funding.

According to Buckley et al., as with all areas of public funding, the application procedure and the decision on the distribution of funds directed towards the community broadcasting sector should be 'fair, open and transparent and based on clear public interest criteria'. All public funding should respect the integrity of community broadcasting and enable rather than constrain its independence. This is also the case in relation to funding directed towards programme production. Buckley et al. also conclude that a substantial part of any production fund 'could provide guaranteed and regular core financial support according to an agreed and transparent formula, for instance based on the amount of funds raised from other sources or the size of a potential audience or some subjective measure' (Buckley, 2008, p. 226).

In a report commissioned by the Community Media Association (UK), 'Making it Work'[11], the same author undertook a comparative analysis of successful community radio stations in five jurisdictions. One element that was considered in the success of the five stations was the 'national infrastructure and support' available to the stations. Here Buckley concluded that key elements of progressive state policy support were as follows:

- Dedicated funding for the sector;
- Core funding for the radio stations;
- Access to spectrum;
- Effective sector bodies; and
- Core funding for sector bodies.

[11] Buckley, S. (2006) *Making it Work, Learning from Successful Community Radio Stations,* UK: Community Media Association.

Buckley proposes that in the radio stations under review, basic enabling legislation was in place but funding for the sector was widely divergent. The report demonstrates that stations that operated under the conditions listed above witnessed the most significant growth within the sector.

The Centre for International Media Assistance (CIMA) has also reflected upon criteria for public funding as an element of successfully developing community radio[12]. Twenty-seven community media practitioners and experts addressed varied issues related to the theme of 'community radio: its impact and challenges to its development' and produced a working group report on the topic. In the executive summary the report details the features of community radio and suggests that 'long term commitment and co-ordinated efforts are necessary for the institutional development of community radio' and that 'funding strategies and development models should encourage sustainability in the long run'. In the chapter 'Challenges to Sustainability and Funding Perspectives of Community Radio', Kim Mahling-Clarke argues that the following criteria are key to the long-term success of community radio and must be considered within funding initiatives:

- Active participation by volunteers;
- The production of engaging programmes which are responsive to the listeners needs;
- Training and skills adapted to community media ethos;
- Adjustment to the changing media environment;
- Editorial independence (creating a gap between funding and programming); and
- Funding sources which are not subject to political change.

Clarke also points to the consensus within the sector that 'all aspects of sustainability – social, institutional and financial – should be incorporated into the overall strategy of community radio development' (CIMA, p. 13).

[12] Centre for International Media Assistance (2007) Community Radio: Its impact and challenges to its development, CIMA.

In the later study Buckley et al. also provide a brief consideration of the relationship between programme production support and the development of the sector. A central argument of this study is that whereas funding for programme production is important,

> funding arrangements are only one of the issues that affect the viability and sustainability of community broadcasters. The social base, authenticity and responsiveness of the broadcaster to its audience are crucial factors which are strengthened by interactive programming and by accountable and participatory management structures. Most community broadcasters depend heavily on volunteers to assist in programme making, fund-raising and other activities and rely on the active involvement of local groups and organizations to provide expertise and input on matters of local and community concern. Support programmes should recognize that social, institutional and technical sustainability are as important to the functioning and survival of community broadcasters as economic arrangements (Buckley et al., 2008, p. 220).

This provides a useful set of parameters for understanding how sustainability and development stretches across the key categories of the financial, social, institutional and the technological.

Sustainability and Development

Perhaps the central developmental goal that emerges from the literature is the attainment of sustainability within the sector. The need for sustainability reflects both the relative youth of the sector and the difficult operating environment that community radio initiatives tend to work within. According to a study commissioned by Internews, the international media development organisation, sustainability simply refers to the 'ability to keep something going over a period of time'[13]. For many, achieving sustainability is the first step on the road to further development. The report builds on earlier research carried out by Gumucio-Dagron and Dlamini (2005)[14] in highlighting that sustainability in community broadcasting has three separate but related axes: social, institutional and financial. The report gives the following definitions of these axes:

[13] Fairbairn, J. (2009) *Community Media Sustainability Guide: the business of changing lives* Washington: Internews.
[14] Gumucio-Dagron, A, and Dlamini, H. (2005). 'Sustainability of CMCs', in Guidebook on setting up a community media center. Unesco. See portal.unesco.org/ci/en/files/15721/1084292960512.pdf/12.pdf (Accessed 02/12/10).

- **Social sustainability** refers to all the social processes that are needed to create sustainable community media, including community participation in governance, management, operations, content production, generation of income, and feedback.
- **Institutional sustainability** refers to the policies, governance structures, management structures and styles, staffing, internal relationships, and practices, as well as partnerships with organizations and the legal and regulatory environment.
- **Financial sustainability** is the organization's ongoing income-generating potential, and includes cash and donations of goods and services (Fairbairn, 2009, pp. 11-13).

As is clear from the studies mentioned in the previous section, technical sustainability is a fourth axis which has taken on increasing importance in a changing media environment. Taken together the contribution of public policy/public funding to these four axes can be used as a metric to evaluate the contribution of public policy/public funding to sustainability and development in the sector.[15]

It is common in most countries that differential policy and funding measures that support the sustainability of the community radio sector along one or more of these axes are part of a wider policy mix. Thus, for example, Irish community radio is supported by multiple public funds. Varied aspects of public funding can emphasise differential aspects of sustainability, e.g., the BAI's support for the sector representative body, Craol, the Department of Community's grant support for operational funding of stations, and the Department of Employment's support for staff through the community employment scheme. It is thus the case that varied policy measures may support different dimensions of sustainability within the sector.

Any particular fund should necessarily be mindful of the development/ sustainability of community radio via support of all of the aspects of sustainability within individual grant measures. Thus social, institutional, financial and technical sustainability dimensions are important elements of joined up policy approaches. Content production funds for community radio need to take into account the social, institutional, technical and financial aspects of sustainability. What is clear is that both core funding approaches and project-based funding

[15] The studies reviewed here, however, do not go so far to develop these criteria as metrics.

initiatives for production funding differentially support aspects of the social, financial, technical and institutional sustainability of the community radio sector. The question thus becomes how any particular fund, however configured, operates as part of a wider funding matrix to enhance these aspects of sustainability.

Chapter Three – The Community Radio Sector in Ireland and the Sound and Vision Broadcasting Funding Scheme

Introduction

This chapter starts with a brief overview of the community radio sector in Ireland and describes how the sector is currently funded. The development of the Sound and Vision Scheme in Ireland is outlined, from its origins in the 'Forum on broadcasting report' through to legislation, policy and how funding is disbursed. The chapter then looks at the impact of the Scheme from two key perspectives – the first formal statutory review of the Scheme conducted in 2008 and, secondly, a study commissioned by Craol and carried out by Dr Maria Gibbons in the same year. The benefits of the scheme are presented, along with challenges identified by the community radio sector. The chapter concludes with some final thoughts on factors influencing the future development of the Scheme.

Community Radio in Ireland

Community radio in Ireland developed following the Radio and Television Act of 1988, which allowed for the establishment of the Independent Radio and Television Commission (IRTC) and a regulatory framework for the independent broadcasting sector. Initially the IRTC commissioned a feasibility study for community radio through a pilot project which awarded 11 community radio licences. This pilot project concluded in 1996, with ten of the participating stations subsequently awarded licences for a five-year period.

Community radio developed in parallel with a growing community and voluntary sector in Ireland. From broadcasting activity right through to management structures and funding, community radio differed from commercial and state models and in recognition of this, the IRTC together with the Community Radio Forum of Ireland[16] developed a policy document on community radio. The document proposes the following definition of community radio:

[16] Now Craol.

> A community radio station is characterised by its ownership and programming and the community it is licensed to serve. It is owned and controlled by a not-for-profit organisation whose structure provides for membership, management, operation and programming primarily by members of the community at large. Its programming should be based on community access, and should reflect the special interests and needs of the listenership it is licensed to serve.[17]

Over the past 15 years the sector has grown, with 22 stations now licensed in Ireland, representing urban, rural and communities of interest. Stations are bound by contract to the BAI (formerly the IRTC), and contracts issued to all stations include a commitment to the AMARC Charter for Community Radio Stations. The availability of temporary licences allows communities to explore the feasibility of community radio for a particular geographic or community of interest and build their own capacity, before applying for a ten-year licence.

Financing Community Radio

Stations are funded through a variety of sources. Advertising and sponsorship has provided varying levels of funding for stations. Many stations have successfully drawn down grants from government departments and various agencies – including those from the Department of Education and Skills, Pobal, Leader Companies, and the Department of Community, Equality and Gaeltacht Affairs. Community Employment Projects funded through FÁS, the National Training and Employment Agency, along with the Pobal Community Services Programme (CSP) provide a basic staffing structure for the majority of stations. This staffing structure supports a wider cohort of volunteers and community groups to engage with different aspects of station activities.

The BAI is responsible for a number of funding schemes which have provided financial support to community radio stations. These schemes include:

[17] BCI Policy Document on Community Radio (1996), p.3

- *The Community Broadcasting Support Scheme (CBSS)*: a development fund which allows community radio and community television stations to carry out evaluation activities internally and externally.[18] The Scheme also funds CRAOL networking and training activities.

- *The New Adventures in Broadcasting Scheme*: originally launched in 1996 and which funded programme productions from the independent broadcasting sector and supported stations in 'selecting and showcasing specially crafted original programming' (BCI, 2005). The New Adventures in Broadcasting Scheme was part of a broader BCI commitment to a developmental role within the broadcasting sector beyond its core activity as regulator. The scheme invited applications under three headings: innovative one-off programmes, sustainable programming and Irish language programming.[19]

- *Sound and Vision, the Broadcasting Funding Scheme* has become a significant source of income for the sector over the past five years. Administration and development of the scheme is the responsibility of the BAI since its introduction in 2006.

[18] This may include development of a mission statement, strategic planning or audience research.
[19] NAB was introduced in 1996 and subsequently relaunched in 2007. See http://www.bai.ie/funding_development.html [Accessed 03/12/10].

Origins of Sound and Vision: The Broadcasting Funding Scheme

The Broadcasting Funding Scheme was established on foot of the Broadcasting Act 2003.

The scheme was officially launched in 2006 and since then the BAI has advertised 10 funding rounds for both radio and television productions from the commercial, state and community broadcasting sectors.

The introduction of the scheme followed extensive discussion on public service broadcasting in Ireland. Issues such as funding and regulation of the state broadcaster were raised through a public consultation process which resulted in the publication of the 'Forum on Broadcasting' report by the Department of Communications, Marine and Natural Resources in August 2002. The report acknowledged that public service broadcasting was not an activity confined to RTE, and also recognised community radio as a distinct third sector and *a valued element which should be fostered.* The final report of the Forum on Broadcasting outlined how other broadcasters might develop their public service remit through a change to the licence fee structure, as announced by the then Minister Dermot Aherne.

> He (the Minister) also considers it important that a small amount of the licence fee (i.e., 5%) should be used to support and develop this process and accordingly he proposes to make up to 5% of the licence fee available for such a scheme to be run under the Broadcasting Authority of Ireland (BAI), with the details, criteria and operation of the new scheme to be published in 2003. [20]

The Community Radio Forum made a submission[21] to the Department of Communications, Marine and Natural Resources which made specific proposals about the disbursement of the fund to community radio. The submission proposes ring-fencing one-third of the scheme for the community radio sector, to be disbursed using a collaborative model developed for the disbursement of funding for Irish language programming.[22] This proposed model would invite stations to submit proposals for long-term thematic programmes. Stations would also be required

[20] Available for download from www.dcenr.gov.ie/files/FINLREPT3.DOC, (Accessed 02/10/12).
[21] Craol Proposal to the Department of Communications, Marine and Natural Resources. Hard copy available by request from Craol.
[22] The Irish Language Advisory Committee and the then IRTC developed this model.

to avail of training in public service broadcasting to be co-ordinated by a dedicated staff member within the BCI.

As plans for the Broadcasting Funding Scheme progressed, the Community Radio Forum engaged in a lobbying strategy and met with the then Minister to formally request ring-fencing of the scheme. The rationale proposed that the community radio sector was a distinct sector in broadcasting and should not be forced to engage in open competition with the independent commercial sector.[23]

Legislative Context

The Broadcasting Funding Act[24], introduced in 2003 on foot of the Forum on Broadcasting, provided the initial legislative framework for the Sound and Vision Scheme. The Act identified a number of thematic programming areas, including:

- Irish culture, heritage and experience in contemporary or historic contexts;
- Programming in the Irish language;
- Programmes relating to the arts and the natural environment; and
- Programmes on adult literacy.

The Act also envisages a role for the scheme in terms of archiving broadcast material. Programmes on the theme of news and current affairs were excluded from the remit of the scheme.

The core objective of the scheme as outlined in the legislation is to increase access to high quality programmes which reflect Irish culture, heritage and experience. A further objective stated is 'developing local and community broadcasting.'

[23] Craol submission to BCI, August 2006. Available from Craol.
[24] http://www.bci.ie/documents/2003fundingact.pdf [Accessed 03/12/10].

The Act authorised the financing of the scheme through 5% of the licence fee. The BCI was assigned responsibility for the co-ordination, development and administration of the scheme. As part of this role, the BCI was committed carry out a review of the scheme every three years.

Changes to the scheme are subject to legislation, and the Broadcasting Act of 2009[25], introduced by Minister for Communications, Energy and Natural Resources Eamon Ryan, included a number of amendments to the scheme. Changes in the Act of relevance to community radio include Section 154 (5), which states that

> The authority (i.e., BAI) in preparing a scheme may have regards to the developmental needs of community broadcasters.

The 2009 Act also expanded the scheme to fund programming in the area of media literacy and global affairs. The 5% of the licence fee available to the Scheme was increased to 7%.

The Sound and Vision Scheme also requires approval by the European Commission, given its possible impact on competition in the European Union. The Scheme was first approved by the Commission in 2005 until 2009. The Scheme was approved for the second time in 2009 until 2014. [26]

BAI policy on Sound and Vision

BAI policy on Sound and Vision progresses the objectives of the scheme and establishes an operational framework whereby applications are assessed and funding disbursed. Policy has developed since the introduction of the scheme in order to streamline the operational aspects of the scheme, and following consultation with stakeholders across all broadcasting sectors. General policy guidelines on applying for the scheme are available through a guide to submissions on the BAI website. The guide to applicants was recently revised and launched as Sound and Vision II.[27] This followed the first comprehensive, statutory review of the Scheme which was carried out by

[25] http://www.bai.ie/pdfs/BroadcastingAct2009.pdf [Accessed 01/12/10].
[26] Article 107 (3) d of the TFEU (Treaty on the Functioning of the EU) – (source, S and V 11).
[27] Available from http://www.bai.ie/pdfs/soundandvisionschemedoc.pdf [Accessed 01/12/10].

Ipsos MORI in 2008.[28] Guidelines governing a 'Special Schemes' element to Sound and Vision are subject to a separate policy document.

General Policy Guidelines

According to the guidelines, programmes must be new, must reflect the themes of the legislation, and must be broadcast by a licensed entity. Diversity and additionality are encouraged. All programme genres are eligible. Funding for training and development activities are generally not permitted under the scheme. There is no prescribed length, duration or number of programmes. Applicants are required to submit an extensive application form with details of the production proposed, along with a letter from a licensed broadcaster who commits to broadcasting the programme during peak times, i.e., 7 am to 7pm.[29]

Special Schemes

In late 2006, the BCI launched the Special Schemes initiative as part of Sound and Vision. In contrast to other elements of the scheme, this initiative allows support for the developmental aspects of a production, on the condition that there is a partnership in place between the applicant and a state agency. The initiative is geared towards funding low budget productions with 'lack of commercial appeal' (BCI, 2006, p.2). Funding under the Special Schemes strand of Sound and Vision is allocated on a discretionary basis by the BAI, to encourage the development of programmes on particular themes, or to commemorate events of particular historical or cultural significance to the State. The allocation of funding is guided by a policy document[30] which outlines particular objectives. These objectives include building links with broadcasters and responding to the needs of the sector.

A maximum amount of €425,000 is allocated on an annual basis for Special Schemes projects. If Special Schemes funding is not awarded, then it is redirected to subsequent Sound and Vision rounds.

[28] Available from the BAI.
[29] Sound and Vision II allows documentaries to be broadcast between 7 am and 9 pm. Children's programmes, educational programmes and Irish language programmes are all exempt from this requirement.
[30] http://www.bci.ie/documents/special_schemes_policy_sep06.pdf, [Accessed 03/12/10].

Disbursement of funding

Funding for the Sound and Vision scheme is disbursed in rounds. The BAI issues a public call for applications, which is promoted through national print media to broadcasters and relevant stakeholders, and through the BAI website. Applications for radio programmes are invited separately from television programmes, and approximate dates for future rounds are made available on the BAI website.

A substantial delay between the passing of the legislation and the initial launch of the scheme resulted in a backlog of funding available in the initial four rounds. By the end of 2007 this backlog had been completely cleared.

The table below outlines the funding disbursed to date. The ratio of funding currently stands at 80% television to 20% radio.[31]

Table 3.1 – Sound and Vision Funding 2006-2010[32]

Round No	Funding Awarded – Radio	Funding Awarded – Television	Total funds awarded
1	0.500m	10.500m	11.00 m
2	0.468m	9.590m	10.058m
3	1.43m	9.000m	10.143m
4	0.954m	8,700m	9.654m
5	0.707m	3.800m	4.507m
6	1.126m	4.1m	5.226m
7	1.240507m	4.4m	5.64m
8	960,000		
9	956,000	7m	7.956m
10	1.2 m	6.728,500[33]	7.928m

In February 2010 the BAI announced that it would cap the amount of funding available per round at €1.5m for radio and €7 million for television.[34]

[31] Sound and Vision II.
[32] Figures obtained from BCI/BAI press releases and Craol.
[33] Excludes two applications awarded funding in sterling, see: http://www.bai.ie/pdfs/20110221_svtv10_pr.pdf, [Accessed 01/12/10].

The applicant is required to provide matching funding (monetary or in kind) – ranging from 5% of the overall amount requested up to 15% and above, depending on the amount of funding sought.

Assessment of applications and awarding of funding

The assessment process is clearly laid out in a number of documents on the BAI website. The first stage involves BAI staff screening the applications to ensure that the applicant has complied with the thematic areas of the scheme and included relevant documentation.

The applications are then read and reviewed by BAI staff along with a panel of assessors and external readers drawn from a range of interests and experience across the broadcasting sector.[35] This stage is known as qualitative assessment. Assessors are briefed to make funding recommendations based on relevance to the themes and objectives of Sound and Vision. The proposal must be new and innovative, and aspire to high standards of quality. The project should add to the range of listening/viewing options for Irish audiences. Partnerships, which add to the application financially or otherwise, are taken into consideration and the proposal should also demonstrate 'value for money'.

Additional criteria apply to the assessment of applications from the community radio sector.[36] The following additional questions inform the assessment process for proposals for broadcast on community radio.

- Does the programme preserve the ethos of community broadcasting?
- Is the proposal based on community access?
- Does the programme support active community participation?
- Does the programme support the development of skills within the community?
- What impact will the programme have on the development of the broadcaster?

[34] http://www.bai.ie/about_news_art007.html, [Accessed 01/12/10].
[35] Details on assessors for funding rounds in 2007 and 2008. Available at http://www.bci.ie/broadcast_funding_scheme/assessor.html, [Accessed 01/12/10].
[36] http://www.bai.ie/pdfs/soundandvisionschemedoc.pdf, [Accessed 01/12/10].

A third phase involves 'strategic assessment', where applications were grouped according to broadcast service type, genre and language. The purpose of this stage is to ensure balance between the views of assessors and readers with the objectives of the scheme. A series of recommendations is drawn up for submission to the Authority.

In the case where the number of projects recommended for funding exceeds the resources available, the BAI reconvenes and examines the proposals again on the basis of

- Diversity of Audience;
- Diversity of Content;
- Track Record;
- Capacity to deliver; and
- Recommendations from panel assessors.

This final list is submitted to the Board of the BAI for ratification. If approved by the Authority, successful projects are given a formal letter of offer for funding. This may include changes to the budget, or suggested amendments to the proposal.

Proposals which are not approved for funding are given feedback in writing from BAI staff. Unsuccessful applications are eligible for resubmission once in one subsequent round.

The names of panel assessors for 2007 and 2008 are publicly available on the former BCI website.[37] Further details on the assessment process, including the weighting of community radio criteria in relation to other criteria, is not currently publicly available.

Changes to Sound and Vision

As outlined in their initial strategy, the BAI is committed to ongoing feedback from and liaison with stakeholders and applicants 'to ensure that the scheme's processes remain consistent and

[37] http://www.bci.ie/broadcast_funding_scheme/assessor.html, [Accessed 03/12/10].

fair.'[38] In this context changes have been made to the general administration of the scheme to streamline how the scheme operates. The BAI is also bound by a statutory commitment to review the Scheme every five years.

In 2006 the BCI carried out an operational review of the Scheme, which considered the involvement of both radio and television sectors in the Scheme, the range of themes and genres, general issues in allocating funding, and application and assessment procedures.[39] As a result, some changes took effect in Round 4 of the Scheme.

In 2008 the BCI initiated the first formal statutory review of the scheme, in line with a commitment in the legislation. This was conducted in two stages. The first consisted of a stakeholder review along with viewership and listenership research. A survey was carried out online and stakeholders invited to respond. A number of interviews also took place. The findings of the review are discussed in more detail later in this chapter.

The second stage of the review proposed a number of changes to the scheme, which were approved by the Minister for Communications and Natural Resources in February 2010 and were implemented in Funding Round 10. In January 2010 the BAI launched Sound and Vision II, a revised version of the scheme.[40] This revised model reiterates the importance of dialogue between the Authority and industry stakeholders, as well as a commitment to ensuring that the BAI responds to the needs of various sectors within the constraints of the Scheme.

Sound and Vision II contains a number of changes relevant to the community radio sector. These include a willingness on behalf of the BAI to consider multi-annual funding proposals providing certain criteria are in place. The revised guidelines also state that in limited circumstances the BAI will allocate funding for the development phase of programmes. Finally, Sound and Vision II outlines a distinct assessment approach for proposals from the community media sector.

[38] BAI Annual Review 2008.
[39] BCI Annual Review 2006.
[40] More information available from http://www.bai.ie/pdfs/soundandvisionschemedoc.pdf, [Accessed 01/12/10].

Community Broadcasters' experience of the Fund

As previously outlined, Craol attempted to influence the Scheme by engaging both with the Minister for Communications and also with the BCI. In 2008, Craol formally commissioned an independent research study by Dr Maria Gibbons[41] exploring the sector's experience of the scheme. Gibbon's research covers the first six rounds of the Scheme, which were disbursed between 2006 and 2008, and draws on interviews with 19 representatives from different community radio stations. Other key stakeholders, including the BCI, were also consulted in the research.

The research found significant benefits for community broadcasters, beyond monetary, as a result of engaging with the scheme. Benefits articulated by community broadcasters interviewed during the research process include improved standards, greater diversity of programming, and in general 'raising the bar' of station output, in accordance with the 'quality' criteria of the scheme.

However, there was a concern expressed that the quality criteria within the scheme favoured the production of streamlined professionalised programmes, which might not fit with the ethos of community radio. Core objectives of community radio such as community access, in particular providing media access to groups outside of the mainstream, do not always result in slick production values within commercial or state broadcasting. Community radio also attributes equal value to both the programming output and the production process, while the Scheme focuses solely on the end product – the programme. In summary, Gibbons states the fund 'is perceived as not taking into account sufficiently the unique characteristics of community media' (p. 26).

The requirement to put partnerships in place at the application stage also gave rise to reservations, as community broadcasters actively involved in 'community building', the establishment of formal partnerships in advance of funding being approved, was seen to raise expectations which might not be met. In addition, building relationships and meaningful partnerships with community groups and agencies is an activity that requires a significant investment of time, sometimes years. The process of building trust, raising awareness about community radio ethos

[41] http://www.craol.ie/images/resources/community-radio-and-the-sound--100611161329.pdf, [Accessed 01/12/10].

and developing a proposal collaboratively with a community group was a significant challenge requiring a development phase which did not fit into the Sound and Vision funding model.

Community broadcasters also expressed difficulties with the general administration of the scheme. The current procedure, where stations submit detailed applications for each funding round, generates a significant amount of preparatory work within stations, where ideas and potential partnerships are developed into programme proposals. Changes to the initial proposals recommended by panel assessors often require a scaling back of the project and changes to the planning process. Administration and management of successful programme projects requires substantial human resources, which can be a challenge, given a limited staff structure and volunteer input. This can be further exacerbated, given the unpredictability of funding allocation, which prevents stations from planning in the longer term and resourcing scheme activities. Gibbons' research found that stations which have developed internal frameworks that facilitate the funding process (e.g., dedicated members of staff) are in a better position to capitalise from the scheme – due to increased capacity to develop applications and to meet the commitments of the funding arrangement. These arrangements are likely to be found in more developed and better resourced stations.

The BAI points out that a substantial amount of funding has been allocated to the community radio sector to date. In 2009, it was calculated that 49.6% of the overall radio budget had been awarded to projects broadcast on community and special interest radio.[42] However, this figure does not differentiate between those awarded to independent productions broadcast on community radio, and those produced by community radio stations themselves. This concern has been highlighted by Gibbons, who found in 2008 that there had been a gradual decline in the value of the awards dedicated to community radio broadcasts overall. In order to illustrate this, she separates independent productions from community radio productions, and notes a decrease from 43% in the initial round to 25% in Round 6. Although the station may have benefited through having access to high quality programming through independent productions, the station loses out on other benefits, particularly skills and financial support for the production process such as studio costs and staff time.

[42] BAI Statutory Review Report (2009) p. 13.

Research recommendations

Gibbons makes a number of recommendations to be considered by individual stations, Craol and the BAI. She suggests that the BAI map funding levels to the sector and distinguish between funding allocated directly to stations and that awarded to independent producers. She recommends a separate assessment process for community radio, with greater levels of transparency. She proposes a 'flexible allocation of funds which will grow with the needs of the community radio sector'.[43] She recommends that the scheme be restructured to recognise the unique processes which are integral to the development of community radio and that these be incorporated within the scheme guidelines. The report also recommends that the BAI introduce new strategies to increase the participation of more stations in the scheme.

The report also outlines a role for Craol in terms of supporting its members to take full advantage of the scheme. In practical terms this includes providing opportunities for networking, learning and sharing experience of accessing the scheme. She also identifies a more strategic, lobbying role which sees Craol liaising with the BAI on behalf of member stations and influencing future changes in the scheme.

The report also proposes a number of suggestions whereby individual stations can access and manage resources from the Scheme.

Statutory Review of Sound and Vision

The study carried out by Gibbons coincided with the first formal statutory review of the scheme conducted by Ipsos MRBI[44] in the same year. Here a broad sample of broadcasters, independent producers, industry representatives, BAI representatives and assessors were consulted about their experience of the scheme using a mixed approach combining an online survey and a set of strategic interviews.[45]

[43] Gibbons, M. (2008) *Community Radio and the Sound and Vision Scheme 2005-2008* [Online], Available from http://www.craol.ie/images/resources/community-radio-and-the-sound--100611161329.pdf, (Accessed 01/12/10).

[44] Statutory Review of the Broadcast Funding Scheme (January 2009) available from the BAI.

[45] 164 responses to the survey were received online, and 24 in-depth interviews were carried out.

Specific issues to community radio which emerged within Gibbons' study are not as apparent in the Ipsos MORI research. This may be for a number of reasons. While individual stations participated in the research, Craol was unable to contribute to the study as a representative network.[46] The Community Television Association, Screen Producers Ireland, the Association of Radio Producers of Ireland and other representative bodies participated in the review. As stakeholders and beneficiaries of the scheme, individual community stations did participate in the online survey.

Secondly, the questionnaire takes a more prescriptive approach, where participants are invited to select from a number of suggested answers. There is no distinction made between local and community broadcasting, where both of these sectors are clearly distinct in terms of their objectives, ethos and operational structures, and may express different ideals of what constitutes 'development'.

Despite the absence of Craol's input, the Community Television Association (CTA) echoes a number of concerns familiar to the community radio sector. These include differing perceptions and priorities of quality. In the review, the CTA makes the connection between training and development and higher standards of quality (Ipsos MORI, p. 28) and makes a case for the inclusion of these activities within the remit of the Scheme. Community television is still in its infancy and relies mostly on volunteers and has only been able to engage with the Scheme in a very limited way. The report identifies the tension between community television broadcasting on the one hand, and the Scheme's commitment to providing access to high quality programming on the other. These are also challenges faced by new and developing community radio stations.

Information on the impact of the Scheme on the development of local and community broadcasting within the review is limited. From the assessors' point of view, community broadcasting has developed from having greater access to high quality programming (p. 53).

[46] The final report conducted by Ipsos MORI states that Craol was 'unable to participate' (p.10).

Craol response to Sound and Vision

In addition to its lobbying role, Craol has produced a number of resources designed to support the development of individual stations. As the body which represents licensed community radio stations in Ireland, Craol is an active stakeholder in the scheme and seeks to ensure that all stations are supported to develop through Sound and Vision. This is achieved through the sharing of successful applications, and the development of guides and resources which help stations prepare for the application process, in line with Gibbons' recommendations. This approach is broadly reflective of the ethos of a co-operative or collective, where the movement as a whole benefits from the development of all members. One of the resources developed by Craol is a document drawing on the experience of the scheme from the perspective of a number of stations and which proposes a number of models involving varying levels of staff and volunteer involvement.[47] This is designed to assist stations to prepare with internal challenges that may arise. Craol also cautions against stations' 'over-reliance on Sound and Vision Funding', given the irregularity of calls and funding announcements.

Future developments and opportunities

At the time of writing, the Statutory Review identified the objective of 'the development of local and community broadcasting'. The review states that 'the community broadcasting sector felt that more needs to be done to develop the programme-making abilities of applicants within their respective sectors' (p. 32). It is expected that this issue will be considered within the context of a 'Second Stage Review' and may result in recommendations or changes.

A number of additional factors can be identified which will have an impact on how the scheme develops in the future. At the time of writing the BAI is engaged in producing a new Statement of Strategy.[48] Although the draft statement does not explicitly mention the scheme, a number of commitments emerging within the initial document will no doubt shape how the Scheme develops in the future. Relevant factors which will influence the engagement of community broadcasters in the scheme include:

[47] A Craol Guide – How different stations utilise the Sound and Vision Scheme for their benefit. Available from www.craol.ie, [Accessed 03/12/10].
[48] http://www.bai.ie/pdfs/20101102_baidraftstrat.eng.pdf, [Accessed 03/12/10].

Economic Context

The decline in advertising funding and other funding sources means greater competition for the Scheme. The current economic context necessitates a 'value for money' approach, where the funding allocated towards elements of the production process may decrease.

Expansion of the Sector

In spite of the economic context, community radio is a growing sector within the broadcasting landscape. There are currently 22 licensed stations in Ireland and this is expected to increase over the coming years. As Gibbons' research already identified competition between the 'haves and have nots', competition for limited resources is likely to increase as more stations are licensed.

Media Literacy

The BAI has been assigned a particular role in terms of media literacy, which is also now identified as a theme under Sound and Vision.[49] Community radio stations offer access to production facilities to members of the community and allow them to become practitioners, to shape the content of programming material and play a part in the development of stations. These activities are central to media literacy, and represent strategic opportunities for the sector.

Review and Evaluation

Legislation commits the BAI to review the Scheme every three years. On this basis, the next review of the Scheme may take place in 2013. Craol's input and participation in the next review is vital to communicating the sector's experience of the Scheme.

Conclusion

Community broadcasters agree that the introduction of Sound and Vision has been hugely beneficial for the community radio sector. Stations have access to resources to develop quality programmes which have improved standards across the sector. Volunteers and staff have benefited enormously from the experience – gaining skills in production, editing and project management. Audiences have enjoyed access to high quality documentaries and programmes

[49] BAI Draft Consultation Document, 24. Also see BAI Strategy Statement 2011-2013, Strategic Objective 7.3.

about their communities. The commitment to 'develop local and community broadcasting' is welcomed by the sector.

In saying that, significant challenges and opportunities have been identified by community broadcasters accessing the scheme. From the broadcasters' perspective there is a fundamental conflict between the model of community radio and the criteria of the scheme – where community radio broadcasters are engaging with a funding model which currently favours independent productions. Given increasing reliance on Sound and Vision for funding and the decline of other funding opportunities, this has significant implications for how the practice of community radio develops in Ireland in the future.

The perspective of a representative body which can inform the 'bigger picture' of this process is hugely beneficial and it is regrettable that Craol were unable to participate in the first formal review of the Scheme. However, the perspectives of the community television sector, combined with a parallel report commissioned on behalf of the community radio sector, present common themes.

While it is recognised within the Statutory Review that a significant portion of the fund, 49.6%, has been disbursed to the community radio sector, a distinction must be made between funding allocated to independent productions broadcast on community radio, and productions managed by the broadcasters themselves. Whereas independent productions allow community stations access to high quality programming, other benefits accrue to stations when programmes are produced by broadcasters themselves; these include additional skills, financial support and new partnerships. These benefits and outcomes can add to the long-term sustainability of individual stations and are also of significance in the current economic climate. The question of how the Scheme enables the 'development of community broadcasting' must move beyond the issue of programme production to consider issues such as sustainability and community access central to the ethos of community radio.

The lack of finance for a development phase is a major stumbling block if stations are to meet the criteria for assessment in the scheme. The impact of recent changes in Sound and Vision II, such as multi-annual funding, and a willingness to consider the development phase have yet to be explored and tested by community broadcasters. Engagement of stakeholders in future statutory reviews is vital to exploring the impact of the Scheme. The commitment of the BAI to engage in dialogue with various stakeholders within the industry is acknowledged and welcomed.

Chapter Four – International Funding Models

Introduction

The Community radio production schemes in Austria, Canada, Denmark, France and New Zealand were purposively selected for comparative analysis. These countries are similar to Ireland in relation to their community media sectors and broadcasting policies. They also present a range of funding models to compare and contrast to the Irish situation. All of the selected jurisdictions fall within the parameters of the research question and are comparable to Ireland insofar as they all have programme production support schemes mandated/administered/funded by state broadcasting bodies to which the community sector can apply, wherein the institutional make up of the community sector is similar to that which exists in Ireland.

The following jurisdictional overview will consist of a description of the policy which underpins the operation of the production funds, identification of the organisations which distribute the funding, and a description of the criteria for funding, including a summary of the procedure connected to the distribution of funding. A short background to the development of the community media sector in each jurisdiction is available in the appendices. In the following chapter the varied constituent elements of the production funds will be compared to each other. The table directly below provides a summary of some of the structural and procedural differences and similarities that have been identified across the varied programme production schemes.

Table 4.1 – Overview: programme production funds in France, New Zealand, Denmark, Austria, Canada and Ireland

	France	**New Zealand**	**Denmark**	**Austria**	**Canada**	**Ireland**
Status of Fund	Dedicated	Generic	Dedicated	Dedicated	Dedicated	Generic
Source of Fund	Commercial Levy	State Grant	Licence Fee	Licence Fee	Commercial Levy	Licence Fee
Core V Project Based	Core + Selective Grant	Core	Core Programming Grant	Project (Thematic)	Project (specified)	Project (specified)
Distribution	Tiered	Tiered	Licence linked	Capped funds	Open	Open
Capacity, Procedural and Quality objectives	C, P & Q	C & P	C	C, P & Q	C, P & Q	P & Q
Application cycle	Annual	Annual	Annual	Annual	Annual	Rolling

Austria

At present, the Austrian community radio sector consists of 14 non-commercial broadcasters. There is at least one station operating in each of the country's nine federal states. According to the representative body, the VFRO, non-commercial radio has a reach of four million people. It also estimates that around 2,500 volunteers complement the 40 paid workers that staff the varied stations. The sector reflects the multiple languages that are spoken alongside the official language of Austrian German, with regular programming broadcast in 25 different languages.

The sector relies upon mixed revenues for non-commercial broadcasting. The funding mix consists of public funding, collaborative funding, project funding, donations and sponsorship. Local sponsorship and annual donations are significant in terms of their demonstration of support for non-commercial revenue but insufficient in terms of day-to-day and capital costs. Whereas federal level funding was an important source of majority funds, it declined in the years following 2000. Short-term local or regional project funding represented a lifeline to the sector but was an inconsistent and uneven source of finance. The VFRO has thus been active in lobbying for a more predictable source of funding to be organised at federal level. Following a number of research consultations the VFRO estimated that the annual financial needs for non-commercial radio stations, in terms of equipment, facilities and staff, stood at €366,000 per annum. The total requirements for the sector were estimated at €6m per annum. From 2006 the VFRO lobbied for a portion of the licence fee collected for the public service broadcaster ORF to be directed towards the meeting of these needs.[50]

In 2009 the 'Fund for the Promotion of Non-Commercial Broadcasting' was established alongside a fund for commercial broadcasting by an amendment to the KommAustria Act (2009). The fund offers annual grants for non-commercial radio and television licensed in Austria. The fund is financed from fees collected under the Austrian Broadcasting Fees Act (the totality of which was previously allocated to the federal budget and then to the public broadcaster). Following scrutiny by the European Commission for state aid issues the fund became operational in 2010. The €1.56m which is available to the sector is well below that which the VFRO lobbied for, but is intended to increase (possibly treble) in the period between 2011 and 2013.[51] The fund entails a potential annual average of €90,000 for each of the community radio stations. The fund is administered by the RTR, which awards the grants for the purpose of promoting high quality and diversity in broadcasting. The ultimate decision for granting funds lies with the managing director of RTR's broadcasting division in accordance with the grant guidelines and the advice of a special advisory board.

The key purpose of the fund is stated as being to promote non-commercial broadcast programmes in the Austrian media landscape and, in keeping with the legislative objectives of KommAustria, support the provision of diverse and high quality programme services. The Act states that disbursement of the fund should contribute to the promotion of Austrian culture, cultural

[50] 2010 Interview with Helmut Peissl, Chairman of Verband Freier Radios Oesterreich (VFRO). VFRO documentation available from the VFRO website at http://www.freie-radios.at/index.php?ordner_id=27 (Accessed 01/12/10).

[51] Interview Petra Heidegger, Broadcasting and Telecom Regulator, RTR, 2010.

diversity, Austrian and European awareness and the development of an informed, participative and educated population. It delegates the creation of criteria/guidelines to the RTR for the promotion of programming by providing financial support for production and first run programming; projects that lead to production and broadcasting; the promotion of specialised relevant training and education of employees in programme making, management and technology use; and can also be used for the development of quantitative and qualitative research procedures to evaluate the performance of the non-commercial sector.[52]

The fund is a dedicated fund and only open to those broadcasters that have been licensed as non-commercial broadcasters under the private Radio and Television Acts. The broadcasters are allowed to seek partnership with non-profit international organisations but must ensure that any programming produced is specifically addressed to an Austrian audience. For the purposes of the legislation, non-commercial broadcasters are defined as 'those which are non-profit and whose program contains no advertising and ensure open access to the public for the design of programs of their program'. The development of the fund has also thus contributed to the recognition of the non-commercial media sector in legislation.

The fund is administered by the RTR, which is the limited liability company fully owed by the Federal Government and created to be the operational support for KommAustria. As a support body the RTR works to promote the objectives guiding KommAustria, and manages the 'non-commercial fund' under the auspices of the diversity and quality objectives. The RTR has a Broadcasting Division and a Telecommunications Division, both of which are overseen by their requisite divisional managing directors. It is the managing director of the broadcasting division who has presided over the institutional interpretation of the legislative basis of the 'fund' in consultation with the non-commercial sector. Funding decisions are informed by the legislative framework as recounted above and the guidelines as developed by the RTR and decisions on funding are undertaken by an advisory board in consultation with the managing director.[53]

[52] 2009 Amendment to Federal law on establishment of the Austrian Communications Authority (KommAustria) and a Federal Communications Board (KommAustria Act - KOG).
[53] RTR (2010) *Funds For the Promotion of Non-Commercial Broadcasting: Guidelines*, Vienna: RTR.

There are three strands to how the grant supports community radio programming:

1. Content and Project Funding: Production and broadcasting of programmes, serials, parts of programmes and/or projects which lead to the production and broadcasting of programming, (80% of the fund);
2. Training which will benefit programme production (10% of the fund); and
3. Qualitative and quantitative audience research (10% of the fund).

Eligible applicants are licensed non-commercial broadcasters that have been in operation for at least one year.

The programme fund is for generic programming strands. It is the broadcasters rather than programme producers which formulate the project application. The guidelines aim to encourage programming that is informed by an Austrian and European perspective and which are addressed to the specific groups within the distribution area of the programming. Content must consist of programmes, series and projects which are diverse, high quality, innovative and contribute to the development of civil society. To be eligible for the funds the broadcaster must work under the remit of an appropriate mission statement, be non-commercial and not carry advertising. They must also already produce a minimum of four hours 'first run' programming on a daily basis to be considered. They must also produce 80% of their own schedule.

Funding is allocated to broad programme projects which meet generic programming characteristics. These characteristics have been selected in consultation with the sector itself. In general terms all programming and production therein must be:

1. Open access: the broadcaster must be accessible to individuals and groups for the purposes of extending freedom of speech and access to information, within the general legal frameworks for broadcasting in Austria.
2. Participative: the broadcaster must enable the public to actively participate in the production of programming and provide a platform for training, production and distribution of publicly produced programming.

3. Not-for-profit: the broadcaster must be organised as a not-for-profit entity and have no commercial operations or carry commercial advertising.
4. Transparent: the organisation, process, production, design and selection criteria in relation to production and programming must be transparent and verifiable.
5. Local: broadcasters must see their role as enabling communication in local and regional areas and supporting regional development.
6. Independent: in organisational and content terms broadcasters must be independent of public, commercial and religious institutions and political parties.
7. Principled: broadcasters must prevent any form of discrimination in their operation or output and support social solidarity, freedom of expression, pluralism, equality, human dignity and democracy.
8. Original: radio broadcasters must own, produce and design at least 80% of programming itself and the broadcaster must produce 50% of its own programming.

Programming can fall within a number of generic programme strands. The generic strands are:

- Information, art and culture;
- Education, science and research;
- Economics and technology;
- Social affairs, demographics and health;
- Politics, religion and history; and
- Equality, heritage or sports.[54]

Programming should nominally be produced in Austria with at least 80% of the programme budget being spent within the state. Coverage of sporting events should be local and regional and should avoid premium sporting events (such as the Bundesliga). Newscasts must reflect local and regional diversity and contain material of relevance to the distribution area of the terrestrial broadcast signal.

[54] RTR Guidelines 2010.

Training Assistance

10% of the fund is utilised for the subsidy of training and educational endeavours. The purpose is to upskill both managers and employees in production, technology and executive skills. This can involve staff accessing existing training programmes in the fields of journalism, education, technology and business with the potential of the further transfer of these skills to participants in the broadcasting station, or the provision of this training at station level.

Eligible Costs: for institutional training, trainers and trainees' costs as well as travel expenses are attributable. Added to this, expenditure incurred in relation to the provision of materials and equipment can also be calculated, as can the depreciation of these tools and equipment. Consultancy costs in relation to training provision can also be charged, along with the administrative, rent and overheads costs of running a training programme. Trainees can also charge for hours of training as hours worked, both in terms of training and preparation.

Promotion of research within the sector

10% of the fund can be applied for to develop quantitative and qualitative research projects to increase the knowledge capacity of the sector. The potential projects include research into the audience base of non-commercial programming and the reception of non-commercial programming to allow for improvement in production quality through better knowledge of audience reception. Studies proposed by individual broadcasters under the fund must:

1. Aim to improve knowledge for developing programme ideas, quality and audience needs;
2. Be carried out by institutional or commercial experts;
3. Be beneficial to the commissioning broadcaster, other broadcasters and for the general public's understanding of the sector;
4. Be cost efficient;
5. Be fully accessible to the RTR; and
6. Be fully accessible (unless personally or financially sensitive) to the general public.

Eligible costs include the costs of conducting surveys in the local catchment area and costs of conducting research into the improvement of programme quality. These costs include preparation, travel, consultancy and publication costs.

In the RTR guidelines there are conditions set on the access to non-commercial funds in a given programme year. Broadcasters cannot claim funding for programmes and projects for which they are already in receipt of a federal or local grant. In relation to the production funding, any given broadcaster cannot have access to more than 10% of the overall fund (individual station grants are thus capped). In relation to the educational grants, the grant cannot exceed 60%-80% of the total costs of the educational project, depending on the size of the broadcast station. There are no limitations on the costs that can be attributed to a grant for production and audience research.

Canada

There are 200 community stations in operation in Canada at present. The sector is funded via a combination of advertising, listener sponsorship and federal government funds. The majority of funding comes from listener sponsorship. The language orientation of the station has a bearing on the amount of government funds available to the sector. French-speaking stations attract more federal funding whereas either French or English language stations are more likely to attract funding if they are minority languages in their broadcast areas. The amount of federal funding is limited and tends to make up a small portion of the funding matrix for any given station.[55] There are also assorted funds available from arts councils, culture ministries and public trusts.

There is little direct federal funding for community radio as public funds tend to be allocated on a regional/municipal basis. However, in 2007, the Canadian Radio and Television Commission (CRTC) mandated the Community Radio Fund Canada (CRFC) (see below) to provide funding for programme making across the Canadian community sector and provided a mechanism whereby funding can be channelled from the Canadian Content Development (CCD) funds to community radio.[56] The CRTC has also removed restrictions on the amount of revenue which can be raised by advertising in the sector in order to promote financial viability. The CRTC estimates

[55] Email interview, Annie LaFlamme, Section Co-ordinator, CRTC, 2010.
[56] http://www.communityradiofund.org/index.php?lang=en, [Accessed 01/12/10].

that the 2008 average revenue of community and campus broadcasters stood at $238, 509 (€171,533) per station.

Since 2008, funding for programming was available from the CRFC (Community Radio Fund of Canada) for activities which support the development of the programme-making capacity of the community radio sector. The CRFC was developed and is currently overseen by the three main community radio associations (NCCRA, ARC, and ARCQ). The CRFC was established as a funding agent for the community radio sector, relying on private and public financial support to derive its funds. The CRFC is mandated by CRTC and thus far, the CCD has been the chief source of funds to the CRFC. Thus far the fund has benefited from a grant derived from the CCD. According to the CRFC:

> We currently rely solely on voluntary CCD contributions. The voluntary contribution from Astral Media has enabled us to create an office and provide the sector with our first round of funding. Though small, this is a unique milestone in the history of campus and community radio in Canada. This partnership has worked well for both the Fund and Astral. In fact, the Commission recently approved Astral's application in December to direct an additional $300,000 (€215,757) to the Fund.[57]

Programme funds are awarded to community broadcasters via two funding schemes, the 'radio talent development scheme' and the 'youth internship development scheme'. These schemes are legacy schemes which were originally specified by commercial broadcasters contributing to the Canadian Content Development Funds (CCDs). The core component of each of these schemes, as re-interpreted by the CRFC, is training and local programming.[58]

Each of these schemes has an allocation of $80,000 (€57,535) per year. These schemes enable programme production wherein training occurs on the production projects. For example, within the radio talent development scheme, one grant involved the training of a news director for a station's new output. The training both enabled studio news output and has also ensured skilled personnel are in place at the station long after the funding allowance has diminished. At present CRFC funding for programming is directed towards specific projects which increase the capacity

[57] Presentation of the CRFC to the CRTC in response to consultation CRTC 2009-418
January 18, 2010.
[58] Interview Melissa Kaestner, Executive Director, Community Radio Fund of Canada, 2010.

of the broadcasters to make programmes. Funding is provided for specific programming but the process of making those programmes must have training and/or learning components. The scheme is relatively new (2007/2008) and has thus far run two rounds of funding initiatives and funded 42 projects.

The CRFC has recently engaged in prolonged consultation with the regulator, the CRTC, to expand the funds available via the Department of Heritage and its oversight of CCD funds. Predicated on the proposed increase of funds coming from the CCD source the CRFC is looking to prioritise the needs of both community broadcasters and audiences as follows:

1. Sustainability and Capacity-Building: Skills and knowledge central to the ability of community radio stations to effectively serve their local communities;
2. Local Community News and Access: Local news, public affairs, arts, and community access and outreach programming, including training and production;
3. Community Music and Expression: Programming and projects that highlight and promote local and emerging music and musicians of all genres, and community expression of all types; and
4. Emerging Distribution Technologies: Planning and implementation of systems to support new program delivery technologies, including digital, satellite, Internet, and wireless network distribution.[59]

In July 2010, following a wide-ranging consultation with the sector and the wider industry, the CRTC announced that the CRFC would become a designated beneficiary of a defined percentage of the CCD funds (previously funds directed towards the CRFC were at the discretion of the commercial broadcasters). The logic and rationale is that community radio supports the development of Canadian content, talent and needs more secure and reliable funding to ensure its growth and sustainability. The CCD fund is derived from financial contributions from commercial

[59]CRFC mandate available from http://www.communityradiofund.org/index.php?option=com_content&view=article&id=65&Itemid=53&lang=en, [Accessed 06/12/10].

radio stations, weighted relative to their annual incomes, which are then distributed to agencies which promote and support Canadian audio content production.

According to the Commission the new funding initiative will involve the following:

- Upon amendment of the Regulations, all commercial radio stations (including ethnic stations and spoken word stations) earning in excess of $1.25 (€898,987) million shall contribute 15% of their basic annual CCD contribution to the CRFC. This amount shall be reallocated from contributions which would normally be made to FACTOR or MUSICACTION.
- The plan would result in approximately $775,000 (€557,352) in additional funds for the CRFC. This support will allow campus and community stations to stabilise certain aspects of their operations by making additional resources available to support volunteers, programming and community participation. This will, in turn, lead to increased exposure of new and local talent.
- The implementation of this approach is conditional on: a) an approved accountability structure developed by the CRFC, b) approved restructuring of the CRFC, and c) adoption of necessary amendments to the Regulations.[60]

The new policy direction on funding thus entails the diversion of funds from the existing content support scheme to be allocated to the CRFC for exclusive distribution to the community radio sector. Added to this the CRFC will also benefit from a designated portion of another element of the CCD scheme, the 'tangible benefits' package. Here, 6% is levied on all profitable transfers of ownership and control in the private radio sector. Under the redrafted policy framework the CRFC will have an automatic entitlement to one-twelfth of the funds derived from this source. It is not known how much this will contribute to the fund, as commercial transactions are unpredictable, but the mechanism is another potential avenue for sporadic funding top-ups to the overall CRFC scheme. In relation to both of the funding measures derived from CCD the CRTC has attached the following conditions:

[60] Broadcasting Regulatory Policy CRTC 2010-499 Campus and Community Radio Policy.

> The Commission considers that CCD support given to campus and community radio stations should be directed primarily to enhancing programming and volunteer training. While in kind and technical support will not be eligible, the Commission notes that nothing would stop commercial broadcasters from offering this kind of support by making additional contributions. The Commission encourages cooperative measures between commercial radio stations and the campus and community radio sector. Issues related to new media and on-line presence are addressed later in this document. [61]

The latter condition means that the CRFC will not be able to include planning for emerging distribution technologies in their plans for funding streams mentioned above, if the only funding available to them is the CCD funds. However it does allow the CRFC to develop funding initiatives which balance the needs of programme production enhancement and capacity-building within stations. For its part the CRFC must also make changes to its structure and organisation in order to meet the CRTC's requirements for transparency and fairness in its public funding schemes. The CRFC must put in place procedures for documenting how it uses the fund and how the grants are subsequently used. The CRFC and the stations it funds will need to be accountable to the Commission, whereas the stations must be accountable to the CRFC.[62]

The CRFC is a relatively new scheme which is differentiated from others by the fact that it was initiated and is overseen by the community radio sector itself. It thus represents a bottom-up approach to developing funding support for community radio programme production. This is partly represented in its concerns for sustainability and capacity building that places the emphasis on developing skilled participants in community programming. The regulator, the CRTC, is supportive of the move away from pure project funding to project funding which is predicated on the building of capacity within stations.

[61] Broadcasting Regulatory Policy CRTC 2010-499 Campus and Community Radio Policy.

[62] The plan, which the CRFC are now requested to put in place, include the following:

An administrative funding structure; a staffing plan, including the tasks and salaries of each staff member; a list of other administrative expenses; an appropriate governance structure that demonstrates independence from stations and the Associations; how funding will be allocated, with specific criteria and its intended use; a mechanism for collecting funds from commercial broadcasters; and station expenses that will be eligible for funding.

Denmark

There are currently 175 'non-commercial community' programme licences issued in Denmark. 70 different operators hold these separate licences. This means that there are 70 different CR stations that hold varied licences to broadcast different programme services that make up a station's output. Funding for non-commercial local media is currently generated via a combination of sponsorship, contributions, donations and grants (including the programme subsidy, municipal and state grants). A 'station' is a licensed programme and schedule provider, which may share both station infrastructure and frequencies. Recognised in legislation, licences for non-commercial local broadcasters are made available when frequencies become available.[63] Frequencies can be shared amongst part-time 'programmers' so the amount of licences is not necessarily indicative of the number of physical stations. The Radio and Television Board grants licences and is also responsible for approving the applications made by broadcasters for centrally allocated funding. There is no limit on the number of licences an individual or organisation can hold and many community media production co-ops hold multiple licences.

Programme Funding: The broadcasting regulator, the RTB, operates an annual funding grant of 50m kr (€6m) (2009) for the exclusive subsidy of non-commercial (advertising-free) community media broadcast programme hours. In 2010 community radio attained 18.5m kr (€2.5m) from the fund, representing 35% of the total fund. The fund is sourced from a top slice of the licence fee which supports public service broadcasting in Denmark. The fund is awarded for programme production costs including staff, fixed costs/consumables and production costs for up to 15 'first time' broadcast hours of programming per week. The subsidy is thus an operating grant for broadcasting a set quantity of independent programming that can either be station produced or acquired. The emphasis is thus placed on 'independent radio programming' as opposed to 'independent production'. The independent programming can either be station produced or independent programming that is acquired, as long as the programming is original, scheduled in an original fashion and not repeat programming. Thus qualifying programmes may be produced elsewhere as long as the station itself decides upon their place in the schedule.

[63] 1985 Broadcasting Act (Denmark: Ministry of Culture).

All community radio stations with a programme licence can apply for the grant. In 2010, 175 licence holders applied for and received the subsidy. Grant amounts are relatively evenly spread, with the average grant being €15,164 in 2010. In its application each licence holder specifies its programme plans and commitments for the coming year. The programming itself is assessed on the basis of

1. Its broad contact with the community;
2. The prior performance of the broadcasting station; and
3. Its adherence to general media law.[64]

In relation to the first criterion, stations must provide evidence of contact with and support from community groups in their broadcast area. Equally, these community groups can contact the regulator if they are not satisfied with the station's performance in this respect. In the second criterion, the economic stability and past compliance of the station in relation to the programme fund is assessed. In the third case, the station must not be in contravention of media responsibility laws. There is strong support written into policy that the regulator should have as little influence on the content that is produced as is possible. It is argued that this is an important condition for the maintenance of the strong freedom of speech tradition that has broad community support in the Danish media system.

The 15 hours of transmission cannot include any repeat or network scheduled content (although community broadcasters are allowed to include such material in the overall schedule). However, co-productions with other community broadcasters for multiple station broadcasts are permissible in the calculation of the subsidy. Contribution to co-production is calculated on the basis of resources allocated to the co-production and translated into their equivalent in programme hours. The grant may also cover technology upgrade, the costs of which are spread over the given lifetime of the requisite equipment.

[64] 2010 Guide to Grants on Local Non-commercial Broadcasting, Media secretariat available at www.bibliotekogmedier.dk, [Accessed 06/12/10].

Grants are not permitted to exceed the station's operating expenditure in any given year. Stations must submit an application document which details the proposed original programming for the coming year, the record of the station in terms of past breaches of the existing media law, and demonstrate evidence of contacts with the community in relation to programme production. Although previous performance in the uses of the subsidy is not a stated criterion, a station which does not fulfil its programming commitments or contravenes other subsidy rules can be disqualified from subsequent application.

The scheme is likely to continue into the future. Research into public funding of media in Denmark has recommended more scrutiny of the funding scheme but the general consensus is that the fund is value for money in terms of the service it supplies to multiple communities.[65] The RTB has also offered special schemes under the operation of the subsidy. These special schemes ended in 2010 following a legislative order in 2009. The schemes supported specific elements of the non-commercial sector and included a scheme for student radio and television and local radio and television for the disabled. The value of these schemes was 2m dk (€335,230) in 2009.

Policy changes in the new media agreement (2011-2014) will shape regulation of the media sector in the period from 2011 to 2014. This has some implications for the grant system for programme production in the non-commercial sector. First of all, the overall grant for local media production will be reduced from 50m DKK (€6.7m) to 45m DKK (€6m) with an expected reduction in the amount that is disbursed to non-commercial media. Secondly, the agreement has stated the need for a review of the existing subsidy scheme for non-commercial broadcasters. According to the agreement, a committee made up of local and radio and television representatives will be appointed to review the grants scheme with the following criteria:

- Make suggestions as to how the subsidy scheme for non-commercial community radio and television can be more focused on production and broadcasting of local content.

Whereas the objectives of the review are relatively vague, the regulator suggests that there is a need to ensure that the scheme is supporting local production (as opposed to scheduling) of

[65] Rambol Management (2010) Survey of Public Media Support in Denmark (Ministry of Culture).

community media. The association representing non-commercial community media, SLRTV, have opposed the cuts to the funding pool and see it as a setback to their objective to ensure a doubling in the funds available from 50m DKK (€6.7m) to 100m DKK (€13.4m) (SLRTV open letter). In general terms the representative bodies SLRTV and SAML question the current government's commitment to community media support in the overall media policy agenda.[66] A spokesman for the regulator suggests that the policy reflects the priorities of the Culture Ministry to support commercial broadcasting in difficult times and this could potentially be at the expense of community broadcasting.[67]

France

There are currently 600 associational radio services in operation in France. As is the case with the other jurisdictions, the structure of the sector is partly an outcome of the legislative frameworks that have established the sector. Community radios are non-profit organisations that meet the social objectives outlined in the 1986 Broadcasting Act. The broadcasting regulator, the Conseil Superior de la Audiovisuel (CSA) further outlined the characteristics of Category A community radios as broadcasters which are non-profit, community-oriented and funded through public subsidy and advertising. In relation to funding, category A broadcasters must not source more than 20% of revenue from advertising or sponsorship sources. In relation to ownership, a non-profit association must own the station. A licensed associational broadcaster must produce the programming and at least four hours of local programming must be included in the schedule from 0600 to 2200 hours.[68] If broadcasters fulfil all of these characteristics they can apply for funding from the Fund for Sustainable Radiophonic Expression (FSER), which is structured to provide 50% of annual costs to Category A licence holders.

The Fund for Sustainable Radiophonic Expression (FSER) was established in 1982 to subsidise the new stations and ensure their sustainability. The FSER is overseen by the CSA but is managed by

[66] Interview Rui Monteiro, SAML Arhus, 2010.
[67] Interview, Kaspar Lindhardt, Head of Secretariat Radio and Television, Danish Agencies for Libraries and Media, Ministry of Culture 2010.
[68] Buckley, S. (2009) *Third Pillar of Media Pluralism: community broadcasting in the UK and Europe*, conference presentation available at www2.lse.ac.uk/media@lse/events/MeCCSA/pdf/papers/SteveBuckley.pdf, [Accessed 03/12/10].

an independent committee.[69] The funding is sourced from a tax on the advertising revenues of the commercial radio and television sector, which benefits from the community sectors' lack of intrusion into the advertising market. The amount of the tax forwarded to the fund is agreed between the Minister of Communications and the Minister for the Budget. The fund had a value of €25m in 2006 and the average breakdown per station was €31,000. 80% of the fund goes towards core operational costs, which supports the production of community-oriented programming. The remaining 20% is used for start-up costs for new stations, technology upgrade and a small fund for special projects that support the sector (Buckley, 2009). The fund is thus ring-fenced (exclusive to the sector) and relatively evenly distributed throughout the sector.

An independent committee oversees the fund and facilitates the distribution of the operational subsidy to the associated community broadcasters. A Supreme Councillor of either the Supreme Court or the Court of Auditors chairs the Committee. There are four representatives of State, four representatives of community radio and at least two representatives of the wider public. The Department of Media and Communication provides the secretariat. A member of the CSA is present at meetings deciding the main funding rounds. The Minister for Communications appoints the Committee but the community radio representatives are nominated by the sector representative bodies and approved by the Minister. The committee recommends funding decisions to the Minister who then approves them. The committee interprets the rules for the distribution of the fund according to Decree No 2006-1067.[70]

The Fund has an 80/20 split, with 80% of the funding going towards operational funding. Three other schemes are allocated the remaining 20% and are structured as follows:

[69] For an overview of the fund see http://www.ddm.gouv.fr/rubrique.php3?id_rubrique=40, [Accessed 03/12/10].
[70] Decree No. 2006-1067 of 25 August 2006.

Grant Installation: Given to new radio services authorised by the CSA to help finance the expenditures necessary to start a radio business. The amount can not exceed €16,000 and it can be granted only once;

Capital subsidy: is intended to finance investment projects in radio equipment of a radio service at 50% maximum amount of duty and within the limits of €18,000 for five years. This assistance may be an initial application and an additional request, each giving rise to two payments;

Grant selective action radio: aims to support radio services based on their actions in the following areas: diversification of resources, training of employees and consolidation of jobs, culture and education, integration and the fight against discrimination, the environment and local development, the share of emissions produced by the radio[71] (FSER, 2010).

According to the organisation, ICT Toolkit, the fund was distributed as follows in 2004:

- 14 new radio stations received an average of €15,228 to help pay for their installations for a total of €213,200;
- 584 stations received an average of €40,496 to subsidise their operational costs for a total of €23.65 million; and
- 76 stations received an average of €5,722 to subsidise equipment purchases for a total of €434,870.

The central grant, the operational funding grant, is an annual grant that is applied for before the 15th of April. Decisions on the grant are made between May and December relative to when the application has been received. Funding is made available less than eight weeks after a decision has been reached.

[71] http://www.ddm.gouv.fr/article.php3?id_article=1291, [Accessed 01/12/10].

The 'selective grant action' is a discretionary and competitive top-up of the operational subsidy. It is capped at 60% of the operational subsidy awarded to particular stations and is judged on the basis of the following quality criteria:

1. The diversification of resources and the variety of revenue streams;
2. The vocational training for employees and consolidation of jobs within the service, i.e., up-skilling and employment opportunities;
3. The cultural and educational output;
4. Participation in collective actions in programme production and participation in the network of associative radios;
5. Actions in favour of integration and the fight against discrimination;
6. Actions towards the environment and local development; and
7. The share of output produced by the relevant service within the program schedule.[72] (Article 6, Decree 2006-1067/Interview Eric Lukes).

The value of the select grant to a broadcaster can be as high as €24,000 in a given year. The overall amount of funding dedicated to the selective grant scheme is once again decided upon by joint decree of the Minister of Communications and Minister for the Budget, after consulting the Committee (FSER). It is, however, capped at 25% of the total of the operational grant. Grants are applied for throughout the year and awarded before the 15th of April in the following year.

The 'capital subsidy' grant can be applied for at any time of the year and operates to co-fund equipment upgrade by community radio stations. A station can apply for the €15,000 grant only five years after a previous application. The grant aims to meet 50% of equipment upgrade costs. 60% of the grant is awarded up front and the remaining 40% is awarded following the completion of the technology upgrade/capital project. The 'installation grant' must be applied for within six months of first receiving a licence and can contribute 16,000 towards initial capital expenditure and operational costs.

[72] Article 6, Decree 2006-1067, Interview Eric Lukes, Education Delegate, SNRL, 2010.

At present the SNRL, the representative body of the community radio sector, is mostly satisfied with the structure and operation of the fund. It is also happy with its involvement in the negotiation of changes made to the fund in both 1997 and 2006 and its participation in the evaluation process. It sees the fund as offering a solid base for community radio development that also necessitates the attainment of mixed additional funds. Importantly, the fund is seen as being central to the regional development of community broadcasting. It does, however, want to see the available funding double over a period of 20 years and is disappointed with recent funding allocations.[73] One of the key reasons for this need for additional funds is the process of digitalisation and the implied costs that are going to occur in the sector. It points to the possibility of wider contributions being drawn upon to top up the fund. The SNRL is also critical of the lack of transparency in relation to both the criteria and allocation process of the 'selective grant' mechanism.

New Zealand

Following legislation in 1989, 11 access radio stations were established throughout New Zealand. Since 1997, only one additional station has been licensed, bringing the current number to 12. The licences for these stations are allocated on a selective basis with no fees being charged for spectrum use. The establishment of several non-profit access stations in the 1990s took place against the backdrop of accelerated de-regulation and liberalisation of broadcasting. Access radio emerged in a broadcasting environment which included public, commercial, student and Maori stations. The access radio model that developed was very much the outcome of the policy and funding framework that was developed in the late 1980s. According to Pauling, access radio tailored its programming to meet the criteria for funding developed by New Zealand On Air (NZOA) in concert with the general principles of community radio as espoused by Amarc.[74]

NZOA is the chief provider of funding for broadcast production in New Zealand. As noted above, it was granted access to the public funding in 1989 to create contestable funds for financing public and local content on radio and television. In 2009 these funds were estimated to amount to $4.3m (€2.46m). A board appointed by the Minister for broadcasting (with each board serving for three

[73] SNRL Press Release 'A Fund to Support the Illusion' available from http://www.snrl.fr/Qui-fait-l-info-Les-radios-s-engagent-pour-la-Semaine-de-la-Presse-2011-_a90.html, [Accessed 02/12/10].
[74] Pauling, B. and Ayton, S. (2009) *Radio Diversity: a handbook for community access radio* New Zealand on Air.

years) oversees the body. Funding for the 12 access radio broadcasters in 2009 reached $1.7m (€935,988), contributing to 58% of their annual costs. NZOA provides the community access sector with funding for a range of programming considered to be 'access' programming and does so through both 'project-based' funding and 'bulk funding' for stations. In its project-based funding, pre-determined genre programmes, which are produced by the larger community broadcasters for syndication, can be competed for. This is a minority element of NZOA spending on 'community' programming. The majority of funds are bulk funding and are allocated once a year to the 12 stations in return for production of the categories of programming considered as being diversity programming (section 36c of the 1989 Broadcasting Act). Priority 36c programmes are:

- Minority language;
- Women's;
- Children's;
- Disabled;
- Minority interest;
- Youth; and
- Religious and ethical beliefs.

Programme funding for community radio stations is enabled under section 36c of the 1989 Broadcasting Act. The funding is significant for the sector and can cover up to 60% of the annual costs of running a station. Stations qualify for funding if they are 'community access' stations that have a 'market' of over 50,000 people and provide programming that adheres to section 36c criteria. Following on from the 2009 Community Broadcasting Review, stations fit into four tiers of possible funding relevant to their market size, extent of operations and access initiatives. The level of funding is adjudged accordingly.

Table 4.2 – Tiered funding of Community Radio in New Zealand

Tier 1	Large Metro	Planet FM Auckland	$250,000 (€137,646)
Tier 2	Large Urban	Wellington Access, Community Radio Hamilton, Plains FM Christchurch	$210,000 (€115,623)
Tier 3	Provincial City	Access Manawatu, Radio Kidnappers Hawke's Bay, Fresh FM Nelson, Toroa FM Dunedin, Radio Southland	$165,000 (€90,846)
Tier 4	Small Regional	Coast Access Kapiti, Arrow FM Masterton	$130,000 (€71,576)

Information from NZOA website.[75]

NZOA achieves its section 36c policy through funding the community radio sector, which in turn shapes its schedules to meet the requirements of section 36c programming. This has led to a formulaic model for how programming is organised across the different access stations. The funding from NZOA is provided as operational funding on the basis of facilitating an access agenda that in turn provides diverse programming. On the understanding that not all programming will be of the access type, each station can also provide a layer of programming labelled 'community programming', which once again can be provided by community organisations but are mainly generated by full-time station staff and volunteers. Station-produced local community news and weather falls into this category. Lastly, each station develops a music format that is non-mainstream to give it an identity.

The differentiation between access and community programming is difficult to discern, but it is clear that section 36c programming can be produced by both access and community radio producers, although NZOA prefers the former. Funding is directed towards maintaining the structure for both types of programming. Whereas there is a preference for direct community access programming, programmes made by station staff for community groups are also acceptable under the scheme; that is, the subsidy arising from NZOA funding is not strictly policed to ensure that it only enables 'access led' section 36c programming.[76] However, NZOA acknowledges the

[75] Information from NZOA website: http://www.nzonair.govt.nz/CommunityBroadCasting/CBStrategy.aspx, [Accessed 02/12/10].
[76] Interview, Keith Collins, Community Broadcasting Manager, New Zealand on Air, 2010.

ambiguity here and is in the process of addressing this as a policy issue. The ambiguity, however, does have a purpose insofar as it allows for flexibility in addressing particular stations' needs. If a station has less potential to produce access programmes because of market size and composition, then 'community-based' programming can still be supported, ensuring stations are not penalised because of market size and composition.

For the purposes of supplying funding to community access, broadcasters NZ On Air interprets Section 36c to mean:

- Programmes are made by people from the community, not paid staff. Staff may assist in the making (facilitating/initiating).
- Definitions are based on content and not just on the person making and fronting the programme.
- Programmes are usually made by people/groups who are unable to access 'mainstream' media outlets.
- Programming should have significant talk content. Music should not dominate the 36c schedule[77]

The funding thus incentivises outreach (the inclusion of a fee for access to station resources by community groups, however, is seen as a disincentive by the Association of Community Access Broadcasters (ACAB)). Each station re-applies for funding on a yearly basis. NZOA aims to provide each station with at least 60% of its operational costs based on annual staffing costs, fixed costs and technology maintenance. Stations for their part must raise the balance of 40% for their operational funding and fund all capital replacement and investment, provide for amortisation and fund their own expansion.

As an essential element of this scheme, core funding is adjudged to be effective if it facilitates access initiatives, which in themselves are potential revenue generators. The development of the sector is thus adjudged on the basis of the facilitation of access. For NZOA, access is equivalent to

[77] Radio Diversity, 2009 p. 28.

development. The core subsidies from the section 36c programme take the financial pressure off broadcasters and allow them to forward plan for diversity programme delivery according to the access agenda.[78] Access ensures that programming is 'by the community, for the community and about the community'. Access is a long-term agenda that requires planning. Planning is predicated on the reliability of resource availability.

Conclusion

The above five production funds demonstrate the degree to which they are shaped by the interplay of regulatory and community sector input. There are both similarities and differences across the funds as they reflect different contexts and objectives in their operation but all claim to attempt to support, sustain and develop the community radio sector. The key difference between the funds described arises out of whether or not they are based on core funding or project funding. Core funding is the funding of station operations which leads to the production of community-oriented programming. Project funding is directly allocated grants for specific programming projects. Core funding entails a different emphasis and set of procedures insofar as funding is intended to support the capacity to produce community programming on a continuous basis. Project funding is oriented towards financing particular programmes, series of programmes or programme strands.

Even within this broad division, however, it is clear that there is no simple dichotomy between the two. For example, France has added to its central core funds by introducing installation grants, technology grants and the selective grant which is a performance-related grant linked to particular projects. In Austria, where the fund is nominally a project-based grant, attempts have been made so that the fund addresses core funding issues: the programme projects can be studio-based generic programme strands, whereas non-programme-making objectives are addressed through the technology and funding grants. What has emerged from the current research is that core and project funding are not mutually exclusive and elements of both may be adapted for any particular production fund. New Zealand is perhaps the most pure core operation fund, whereas the other funds have moved towards various hybrid forms that either incorporate project-type funding dynamics into core funding structures or vice versa. The evolutionary nature of each of

[78] Interview, Brian Pauling, former head of ACAB, 2010.

these funds, the ways in which they have been changed and adapted over time, reflect an underlying recognition that there are developmental gains to be had from both 'project' funding and 'core' funding and it is finding the right mix of funding for particular stations at particular times that is a key challenge for both the community radio sector, the funding bodies and the regulators.

Chapter Five – Comparative Analysis of Programme Production Schemes

Following on from the previous descriptions of the background, structure and organisation of the programme production schemes, the current chapter will focus on the specific components of the varied schemes. In order to achieve this the schemes will be broken down into their various constituent elements. The headings cover all of the dimensions of the production schemes, including:

- Objectives
- Eligibility
- Procedure (application process, decision-making and release of funds)
- Award criteria/eligible criteria (organisational and qualitative)
- Monitoring of funding
- Training elements
- Distribution of funds across the sector

This chapter will first evaluate how the objectives of the scheme are articulated within the relevant policy. It will then consider how eligibility for funding is structured. Under application procedure the analysis will consider what is involved in applying for programme funding in terms of application criteria, timing and submission requirements of funding bids. In relation to award criteria it will examine the criteria on which applications are accepted. It will also evaluate the operational and content-based criteria on which funding is awarded. In terms of monitoring it will examine the oversight systems wherein successful recipients of funding are evaluated on their use of funds. It will also take into account the elements of each production scheme that deal with provisions for production training as developmental aspects of the overall scheme. Next it will deal with the spread of funds across the sector and the rationale and arguments for distributing funds in particular ways. Lastly, the overall developmental aspects of production funding will be considered.

Objectives

Each of the funding schemes is informed by a set of objectives for the community radio/media sector developed through legislative, regulatory and sector input. These objectives set important criteria and provide clarity of purpose in relation to the overall aims and procedural operation of the funding schemes. This therefore allows for one measure of the performance of the schemes – the degree to which their objectives fit with the overall objectives of community media sector policy. What is also clear from each of the funds is that the objectives outlined within the funding schemes provide a foundation upon which the structure and interpretation of policy can be flexibly adapted over time. For the community radio sector, having some input into the designation of the objectives of the funding is critical, as is the clear designation of the purposes of the fund relative to community radio development.

In Austria, the most recently initiated fund, the objectives are clearly stated in the regulator's guidelines for the fund. The guidelines state that the purpose of the fund is to promote non-commercial broadcasting as it has developed in the Austrian media landscape. The means of doing this is to support the sector's provision of 'diverse and high quality programmes' that contribute to Austrian culture and cultural diversity and informational and educational programming which contributes to participation and awareness of the population.[79] The means of doing this are through a combination of project funding, training funding and research funding. The fund is specifically designed to promote community broadcasting understood as non-commercial broadcasting and is wide ranging in the potential programme projects that are admissible under the scheme. The scheme is also careful to fund projects rather than programmes, once again to allow some flexibility in relation to how programming may be supported through funding support. It also contains non-programming elements such as training and research as a means of promoting the sector and its activities through its up-skilling of staff and volunteers and its engagement in non-commercial research into its audiences.

[79] RTR (2010) *Funds For the Promotion of Non-Commercial Broadcasting: Guidelines,* Vienna: RTR.

In Canada, the CRFC is a community sector-driven fund, which aims to provide support to the community radio sector to 'foster a well resourced, dynamic and accessible sector'[80] (Annual Report 2009/2010). In its objectives the fund outlines four priority areas:

- To facilitate the development of high quality and accessible community-oriented and not-for-profit audio programming and related services for all Canadians;
- To contribute to a sustainable community media sector in Canada that reflects the diversity of the communities it serves by building the capacity of community radio stations, broadcasters, producers, and distributors;
- To solicit and distribute grants and other forms of support to producers and distributors of Canadian community-oriented and not-for-profit audio programming, and for such other purposes that support the aims of community broadcasting in Canada; and
- To promote the engagement of Canada's community media sector with listeners, communities, government, and other stakeholders, and develop community media as an essential Canadian cultural institution.

The objective of the scheme reflects an assessment that production support should incorporate both 'project'- based criteria and long- term 'operational' criteria, as both sets of criteria can benefit the sector's development. The fund recognises that the suitability of 'project' and 'operational' funding varies with station circumstances. According to representatives of the fund project funding can encourage good resource allocation habits, whereas operational funding can support the overall sustainability of stations and therefore the long-term efficiency of resource allocation.

In Denmark, the fund exists to support non-commercial community radio and television. The objective of the grant is to provide operating expenses for the independent scheduling of non-commercial radio programming. The funding has the objective of encouraging community-based local radio services that support local democracy. Given a long tradition of freedom of speech in

[80] CRFC (2010) Community Radio Fund of Canada, Annual Report, available from http://www.communityradiofund.org/index.php?option=com_content&view=frontpage&Itemid=1&lang=en, [Accessed 02/12/10].

media policy the funding is non-prescriptive in terms of the content aspects of the fund. The objectives of the fund are purposefully minimalistic as the aim of the grant is to support local democracy and freedom of speech through support for, but non-interference in, content development. According to the regulator, an overly prescriptive set of objectives could compromise this.[81]

In France, the objective of the FSER is to support community radio stations and ensure their sustainability. In doing so, the act aims to ensure that community radio stations meet their social objectives, i.e., social inclusion, plural expression and intergroup dialogue, under the 1986 Act (see previous chapter) through a combination of start-up, operational, technology maintenance and project incentive grants.

In New Zealand the funds available from NZOA are directly linked to the section 36 legislative requirements for that body to provide certain types of minority programming. Through both legislation and government policy NZOA has determined that the community access sector is best placed to realise these objectives and funds the sector accordingly. The overriding objective of the funding is to ensure that as many broadcast hours as possible are generated by access groups as supported by staff and volunteers at the station. This is achieved through operational funding that favours access initiatives whilst recognising the limitations that exist in generating such programming.

In each country the objectives of the grant are directly linked to the legislative and policy-driven objectives of community radio sector policy. There is a clear line drawn between the objectives of the funds and the overall purposes of the community sector within broadcasting policy. Regardless of the provenance of a funding scheme, adaptation and re-orientation to the needs and purposes of the stakeholders (community radio sector) has been an important element in the development of each of these funds.

[81] Interview, Kaspar Lindhardt, Head of Secretariat Radio and Television, Danish Agencies for Libraries and Media, Ministry of Culture 2010.

Eligibility

Each of the funding programmes has eligibility criteria in relation to who can apply for funding under the schemes. One of the key issues affecting the sector is the relative exclusivity of the funding which is available. All of the funds examined here are either exclusive funds (France, Canada) or general funds that have ring-fenced amounts that are available to the community media sector (Austria, Denmark, New Zealand). In both the Austrian and New Zealand fund there are exclusive distinctions made between funding for community radio and television production. For all of these funds it is broadcasters as opposed to programme makers that are eligible to apply for funding. In all of the funds, except the Canadian fund, eligibility is also a guarantee of access to funding providing the procedural criteria are met.

In Austria, the ring-fenced fund is exclusive to those broadcasters that have been licensed as non-commercial broadcasters under the Private Radio and Television Acts and have been in operation for more than one year. There is a ring-fenced fund for radio, which is separate from the television grant. To be eligible broadcasters must also already produce four hours of new programming daily. The broadcasters are allowed to seek partnership with non-profit international organisations but must ensure that any programming produced is specifically addressed to an Austrian audience. For the purposes of the legislation, non-commercial broadcasters are defined as 'those which are non-profit and whose program contains no advertising and ensure open access to the public for the design of programs of their program'[82].

In Canada, community-oriented radio stations licensed by the CRTC can apply for the funding available under the various CRFC schemes. There are 140 such broadcasters and they must generate project proposals so that they meet the criteria of the specific project grants that are available. The fund is thus exclusive to the community radio sector.

In Denmark, the fund is an exclusive subsidy for non-commercial community broadcasters that do not source revenue from advertising. The value of the grant is ascertained by dividing the total amount of monies granted by the amount of programme hours applied for. However the grant

[82] 2009 Amendment to Federal law on establishment of the Austrian Communications Authority (KommAustria) and a Federal Communications Board (KommAustria Act - KOG).

amount covers both television hours and radio hours, with the former receiving ten times the amount of the latter. The RTB tends to allocate the fund on a 65/35 Television/radio ratio. All community radio and television stations with a programme licence can apply for the grant. In 2010, 175 stations applied for and received the subsidy. Separate application procedures exist for the radio sector but, as stated, programme funds for television are greater and are likely to become more so as digitalisation allows for more television licences.

In France, the FSER is exclusive to the community radio sector. Community radios are non-profit organisations that meet the social objectives outlined in the 1986 Act. The CSA further outlined the characteristics of Category A community radios as broadcasters which are non-profit, community-oriented and funded through public subsidy and advertising. In relation to funding, category A broadcasters must not source more than 20% of revenue from advertising or sponsorship sources. In relation to ownership, a non-profit association must own the station. Programming must be produced by a licensed associational broadcaster and at least four hours of local programming must be included in the schedule from 6am to 10pm. If broadcasters fulfil all of these characteristics they can apply for funding from the FSER that is structured to provide 50% of annual costs to Category A licence holders.

In New Zealand, funding under the section 36c strand is only open to the 12 licensed access community broadcasters. These stations must have a base population of 50,000 or above, be not-for-profit organisations and be representative of a variety of groupings within the community. The access radio fund is part of a wider fund to support radio and television programme diversity but is differentiated from those sectors via a ministerial directive. NZOA has had discretionary control over how much of the overall fund is dedicated to community access radio.

Eligibility criteria have implications for the developmental aspects of the funds, as they are an important element in determining the potential resources available to the community sector, allowing for forward planning and the relative security of these funds into the future. In France, New Zealand and Austria there is some predictability of funding insofar as eligibility for funding is linked to entitlement to funding. However, in Denmark, the fact that the total fund is allocated for both community radio and television creates a degree of uncertainty as to the proportion of the fund dedicated to each. In Denmark there are sustained attempts by the sector to rebalance the allocation of funding to radio relative to television. In New Zealand, eligibility guarantees access to funding but the amount of funding for 36c programming is discriminatory. Although the amount of funding available to community radio has been consistent, there are concerns that changing priorities within NZOA could have adverse impact on the funding available.

The Grant application/appraisal process

All of these are schemes that have to be applied for on an annual basis and involve the submission of detailed application forms combined with various forms of documentation. In each case the regulatory/funding bodies see the operation of annual funding applications as key means of ensuring accountability from the sector in its use of funds. In each case there are different lengths of time involved in the decision-making process. Key issues for the representatives of the community radio sector are that each scheme offers clarity in terms of the award criteria (see next section), is transparent in terms of the judging of applications, is timely, and provides feedback in relation to awards given or refused.

In Austria, it is the broadcaster as opposed to programme producers that formulates the programme bid, which is made to the RTR. The application for programme production funds requires applicants to include information on the station, its mission statement, information on the persons involved in the project, statement of the total cost of the programme to be funded (including all those elements that can be claimed for as listed above), and other grants that the applicant is in receipt of. For the training grant information must be provided on participants and the purposes of the training programme. For the research grants, applicants must include information on personnel, purposes and costs of the project.

The RTR has set up an advisory board on local broadcasting of five independent academics/broadcast personnel; however, final decisions rest with the RTR. Decisions are thus made by the external panel of experts working with the director of the RTR. According to the regulator an attempt has been made to reduce the bureaucracy involved in processing funding applications by requesting that each station submit only three funding applications per station. Stations are requested to inform the regulator as to their order of preference in relation to the applications. The regulator is also sympathetic of requests to include community media representatives in the award process and is keen to address this omission in the future. Decisions on the awarding of grants are made less than three months after the deadline for proposal submission has passed and the regulator draws up a programme contract.

On the signing of a production agreement broadcasters are forwarded 50% of the agreed programme costs. A further 30% of the programming cost is forwarded in the middle of the programming calendar year. The final 20% is forwarded in the following year following the successful outcome of an audit on how the funds have been used.

In Canada, the two funding schemes have run for two consecutive years in 2009 and 2010. According to the CRFC, applicants are requested to 'submit a completed application form, a copy of their letters patent and the first page of their CRTC licence, the most recent operating budget and audited statements (where available), a list of board of directors and employees, and various biographical information'.[83] The call is announced with a one month deadline for submission.

The CRFC appoint an independent jury of three to assess the applications received from the sector. The assessment takes place over a period of six weeks, wherein the assessors have access to a private interactive online space that contains all relevant documentation, including the CRFC's assessment grid. At the three week mark the jury request clarifying statements from some of the applicants through the CRFC executive. Applicants have one week to make responses to these queries. The jury can re-adjust their scores on the basis of these replies. In the sixth week the executive director facilitates a day-long meeting between the judges, wherein scores are compiled and recommendations made. Successful applicants are informed thereafter.

Each successful applicant receives 90% of the total grant as soon as a funding agreement is signed. The agreement details the 'terms, responsibilities, approved activities, approved expenses, deliverables and reporting mechanisms of both parties'.[84] The CRFC release the final 10% after a final report has been received and processed.

[83] CRFC (2010) Community Radio Fund of Canada, Annual Report.
[84] CRFC (2010) Community Radio Fund of Canada, Annual Report.

In Denmark, licensed stations must submit an electronic application document which details the proposed original programming for the coming year; budgeted income and expenditure (including salary information); the record of the station in terms of past breaches of the existing media law; and an account of contacts with the community in relation to programme production. The deadline for applications is late September so that the grant can be operational at the beginning the following year.

Decision-making on grants is carried out by the RTB, consisting of eight members appointed by the minister. The board also draws on the input from a four-member, specially convened expert group on local broadcasting. The board signs off on operating subsidies granted for the following year and the decision is forwarded to the Media Secretariat for confirmation. Stations are notified of their grant amounts by mid-December and a letter of agreement is signed between the RTB and the grantee.

In France, the annual application round is announced by the FSER and stations must fill a single application for the core operational grants and the selective grant and apply separately for the additional grant schemes. Applications must be submitted by the middle of April, whilst decisions are made from May to December. Payments are made from 6-8 weeks after notification. Applications are dealt with in order of reception.

The core operational and selective grant application includes a detailed overview of revenues (sales, grants (municipal/regional), advertising and sponsorship) raised in the previous year as well as documentation to prove the legality of the station. It also requires the association to provide a detailed overview of the staff (both paid and unpaid) and programme output for the previous year (including details of the origin of the programming). Before submission an authorised accountant must approve the accounts. There is also a detailed application form to be filled out by each station. The operational grant is then calculated on the basis of yearly operational costs of the radio station that correspond to a sliding scale of grants as developed by the CSA. The level of subsidy is also linked to the non-commercial revenue raised by the stations with the intention of rewarding fundraising activities by the stations.

An independent committee that facilitates the distribution of the operational subsidy to the associational community broadcasters oversees the fund. Either a Supreme Councillor of the Supreme Court or the Court of Auditors chairs the Committee. There are four representatives of State, four representatives of community radio and at least two representatives of the wider public. The Department of Media and Communication provides the secretariat. A member of the CSA is present at meetings deciding the main funding rounds. The Minister for Communications appoints the Committee but the community radio representatives are nominated by the sector representative bodies and approved by the Minister. The committee recommends funding decisions to the Minister who then approves them. The committee interprets the rules for the distribution of the fund according to a prescribed marking grid.

All decisions are made by the Committee and approved by the Minister. If an application for a grant is refused, broadcasters may appeal to the Administrative court of Paris within two months of the notification of refusal. The assessment and monitoring criteria are built into the application procedure that requires an overview of accounts as well as the programme output for the previous year. A 'grid' regulates the distribution of funds that the committee works to, to assess applications. The selective grant action also entails a competitive element to the fund.

In New Zealand, each licensed station re-applies to NZOA for its annual funding. There is also a yearly meeting between NZOA and station managers where the concerns of the sector and the funder are aired and discussed. Decisions for continued funding are made on a yearly basis, providing NZOA with an ongoing accountability mechanism, but stations can assume that funding will be ongoing once the access criteria are being met. The stations submit a detailed annual financial report to NZOA. NZOA produces a handbook entitled 'Radio Diversity' that is the bible for access community radio in terms of what the funding body expects from them. There are clear guidelines on producing annual reports that set the criteria for the access station's annual report to NZOA.

In each of the jurisdictions there are varied ways of ensuring the process is transparent, timely and productive. For Canada and France, the inclusion of independent panels and community media sector representatives in the process is one way of ensuring both transparent and productive encounters in terms of funding applications. In Austria and Denmark an independent panel, known for their expertise in media/community media, provides some credibility to the assessment procedure. Also, in Austria, the limiting of applications to three applications per station ensures efficiencies in both the application process (broadcasters) and the assessment process (regulator). In the operational funding jurisdictions (Denmark, France, New Zealand) the emphasis is on the standardisation of accountancy and record keeping procedures as the basis of programme applications, ensuring the development of best practice in station management and efficiencies in administration. Funding is awarded on an annual basis, as in all jurisdictions regulators are reluctant to move to multi-annual funding as it reduces accountability procedures. In New Zealand there is some sympathy for the idea that larger, well-functioning stations should be able to apply for multi-annual funding on the basis of the stability of their operations and the increasing ambition of their projects.

Award criteria/eligible costs

In this section the focus will be on the published programming criteria for awards, the various metrics used by the regulators/funding bodies in their assessment of grant applications and the eligible costs included in programme production. The different objectives and structures of the funding schemes means that there are varied approaches for setting criteria for successful awards. In all cases there is a combination of output and organisational assessments that shape the criteria for awarding grants. In each country budgetary and operational efficiencies are primary elements of the award criteria, whereas past performance and adherence to general media law are also measures of potential success.

The Austrian fund is streamed into three potential awards. In relation to the content fund, stations apply for and are judged upon specific programming projects. These do not have to be self-contained stock programmes but can be live scheduled programme strands. As demonstrated in the previous chapter, eligible programming can fall within a number of generic programming strands and meet a general set of criteria.

The purpose of the content and project support is to encourage the production of Austrian and European-produced cultural output in the form of programmes or programme strands which contribute to the diversity, quality and innovation in programming which support the development of civil society. In general terms the treatment of any of these broad programme strands must adhere to a set of criteria; any given programme proposal must:

1. Demonstrate through the content or its participants a unique Austrian, regional or local identity;
2. Preserve, strengthen and develop the Austrian, regional or local identity in a European context;
3. Involve local participation by the service area public;
4. In the case of news programming, reflect local issues;
5. Be Austrian language-based;
6. Reflect the linguistic diversity of recognised ethnic groups in Austria;
7. Represent civil society groups or languages; support civil society discourse and contribute to social cohesion;
8. Promote the understanding of European integration and international co-existence, and cover European and international issues;
9. Promote cultural, artistic and political discourse and stimulate creativity within Austria;
10. Spread media literacy to the wider population and encourage critical reflection on media and their content;
11. Contribute to the intensive networking of different social, cultural and civil society organisations, initiatives and facilities;
12. Be overseen with editorial responsibility and accountability;
13. Only cover live events of regional or local importance.[85]

These criteria are the basis on which project applications are scored. The broadcasters must also demonstrate how the proposed programme project will be integrated with the existing programming of the station. The training grant proposal for the training of staff and volunteers must justify how that training will improve the output of the station, whereas submissions for the qualitative research grant should indicate how station output develops their knowledge of audience engagement with the station.

[85] RTR (2010) *Funds For the Promotion of Non-Commercial Broadcasting: Guidelines,* Vienna: RTR.

Eligible Costs for content and project funding include:

1. Direct staff costs;
2. Direct material costs including bought-in material, original programme production costs, engineering and development costs, co-production costs, subtitling, audio description, signing; and
3. General indirect costs such as personnel, equipment and administrative costs, rent and infrastructure costs.

The fund explicitly prohibits the charging of costs related to the acquisition of sports rights, music rights and music video rights programming unless these are integral to the nature of wider programme content.

In Canada, the existing project grants, the youth internship project and the radio talent development programme allow stations to submit programme concepts that incorporate youth internship or the training up of staff. The key criteria of the assessment grid are based upon what is being provided for training in terms of both targeted training and training through content production, and how much of this will stay in the station when the funding runs out. Assessment includes consideration of the practicalities of successful completion of the proposal combined with issues of service to the community. Stations must prove their financial and operational health to receive funds. The committee/jury assessed the applications according to the following marking schema/criteria:

- Timeline-5%
- Training Mentorship and Education-25%
- Local Programming-25%
- Budget-10%
- Value and Relevance of the Proposal-35%[86]

[86] CRFC (2010) Community Radio Fund of Canada, Annual Report.

Value and relevance was adjudged on the basis of clarity and relevance of the programming to CRFC and CRTC general policies and priorities as well as the manageability, innovativeness and long-term benefits to both the applicant and the community. In their application under each scheme, applicants detail a programme idea and the potential resources needed to complete it, which can include salary, equipment, training, travel and materials.

In Denmark, the criteria for grant awards are procedural as opposed to project-based, that is, the evaluation criteria are based on the management of funds and their contribution to the capacity to produce independent programming as opposed to the specific contents of programming. They are also relatively minimal due to the hands-off relationship between regulator and content output and the operational nature of the grant. Award criteria are focused on the licensed programmer's broad contact with the community, the projected performance of the station in terms of its independent programming and its adherence to general media law. Broadcasters must submit a budget for the coming year as well as an indication of the independent programming hours that they are applying for. A large emphasis is placed on the previous and ongoing accounting procedure of the broadcasters and the previous and ongoing ability to demonstrate how the subsidy is enabling the production of independent schedules. Independent scheduling can include co-productions, network programming which the station has participated in producing and the presentation of pre-recorded content produced elsewhere (e.g., music programming).

Grants are calculated to provide assistance for up to 15 hours of radio transmission per week and operational support that contributes to that production. Transmission material is defined as a station's 'first time broadcasting hours'.[87] In many cases these stations may provide little more than 15 hours in their broadcast week, as they are more akin to access broadcasters as opposed to autonomous stations. It is stated in the 2006 Order, Article 31, that operating grants aim to assist in financing the station's expenses, including general fixed costs. The grant can also support the payment of salaries as long as those salaries operate within government guidelines on community labour salary levels. The grant can also be used to purchase equipment at accepted market rates and the cost can be spread across a number of years of grants.

[87] 2010 Guide to Grants on Local Non-commercial Broadcasting, Media secretariat available at www.bibliotekogmedier.dk [Accessed 06/12/10].

In France, the criteria for operational grants are also procedural and partly retrospective as opposed to content-based. The application includes a detailed overview of revenues (sales, grants (municipal/regional), advertising and sponsorship) raised in the previous year as well as documentation to prove the legality of the station. It also requires the association to provide a detailed overview of the staff (both paid and unpaid) and programme output for the previous year (including details of the origin of the programming). The operational grant is then calculated on the basis of yearly operational costs of the radio station that correspond to a sliding scale of grants as developed by the CSA. The level of subsidy is also linked to the non-commercial revenue raised by the stations with the intention of rewarding fundraising activities by the stations.

The 'selective grant action' is a discretionary and competitive top-up of the operational subsidy. It is capped at 60% of the operational subsidy awarded to particular stations and is judged on the basis of multiple quality criteria such as the diversification of resources, vocational training for employees, cultural and educational output, etc. (see previous chapter). The selective grant has the key objective of encouraging particular projects and programming on the part of the broadcaster. It is a further interpretation of the aims and objectives of the community radio sector in France.

In New Zealand, the weighting is towards access. Once again as a form of core funding the criteria are procedural and retrospective. The key criteria are efficient management of funds as part of an overall efficient and effective management of the access community station. On the understanding that not all programming will be of the access type, each station can also provide a layer of programming labelled 'community programming', which once again can be provided by community organisations but are mainly generated by full-time station staff and volunteers. Station-produced local community news and weather falls into this category. Lastly, each station develops a music format that is non-mainstream to give it an identity.

In a 2008 consultation document, the key performance measures for assessing Community access programmes were as follows:

- The key performance measure for access radio must focus on the quantity and diversity of the programme makers using the particular station's facilities. The emphasis should be for programmes made by programme makers who are making programmes for particular listeners about particular subjects that are of interest to those listeners.

- For Access radio stations to effectively serve their communities they must keep in touch with their communities, and in particular promote their services and encourage the use of their facilities. Each station should include in their annual application to NZOA information about their plans for community research and consultation. This does not necessarily imply that the stations should conduct quantitative listener surveys but more that they should seek and report feedback from their communities about the needs of the programme makers and their listeners.[88]

There is a clear differentiation of award criteria in relation to core operational subsidies and the project-based grants. The core subsidy criteria are focused on ensuring the effective and efficient use of grants in the maintenance of stations, which have broad community-oriented remits. The criteria are as much based on past performance and output as projected budgeting and programming. For the project-based grants of Austria and Canada the grants are predicated on funding specific outputs. However both of these funds demonstrate some concern to adapt the benefits of core operational funding in terms of capacity building; that is, each fund attempts to ensure that as many resources accrue to the station and that there are longer-term gains from the funding once the specific project is achieved. This is measured in training gains, equipment gains, employee security and, in the Austrian case, diversified programme output that can build station-based programme production capacity.

Monitoring

Each of the funding schemes involves varied methods of monitoring how the resources allocated by funding schemes are used. Again, there is a difference between monitoring those funds that are based on core operations and those which are project based. All of the funding schemes acknowledge that the monitoring of the use of funding is an important element of ensuring that the fund is politically defensible. What is common across the different funds is the fact that each of the schemes tends to concentrate its monitoring on budgetary issues with only varied

[88] NZOA (2008) *Review of New Zealand on Airs regional funding policies for radio and television*, Wellington: New Zealand.

consideration of outcomes, either in relation to programme quality, community impact or training outcomes. Once the money is managed efficiently the funding is deemed to be a success.

In Austria, an audit is carried out at the end of the calendar year. Following the audit, there are conditions for the RTR to recover funds if the terms of agreement based on the applications submission are not met. The applicant must agree to use all funds efficiently and within the legal provisions for broadcasting. The onus is on stations to report to the RTR if for any reason the grant funding is not being used or the station cannot fulfil its programme commitment. The applicant must also commit to open its cost-keeping, production and development records so that the RTR can access and audit the use of funds. The RTR reserves the right to carry out on-site examinations of records on use of the funds either by itself or by a private company acting on its behalf. Broadcasters must furnish all costings/records on programming within six months of the completion of a broadcast run in order to receive its final payment.

In Denmark, assessment of use of grants is retrospective on the basis of submission of programme records and accounts. Funds are paid quarterly in advance, but 25% of subsidy is held back until the overall accounts are submitted at the end of the year. Accounts for the station's entire yearly activities must be submitted alongside specific accountancy on the use of grants. Grants of over 100,000 Danish kroner (€13,411) must be audited. Both the board and management at the station oversee all accountancy procedures. Stations must also keep a recorded copy of the first 15 hours of programming and then written records of subsequent broadcasts therein. Stations can potentially lose their programme licence in situations where grant subsidy outweighs operating expenses, accountancy measures are incomplete/late or funds are used inappropriately.

In Canada, the recipients of grants receive 90% of the total contribution as soon as the initial funding agreement is signed. The remaining 10% is granted once a final report has been assessed and approved. The final report form requires details on how the organisation benefited from the funding; the hours contributed by staff and volunteers; the additional volunteers recruited due to the programming; the benefit of the project to those outside of the station; testimonials from those who benefited; benefits in terms of training and mentorship; the retention of those involved in producing the programming; resources gained in making the programme; the success of the governance of the project; the hours of programming produced; the scheduling of the programming; the non-broadcast use of the programming (podcasts, etc.); the participation of the community in the programming; and reflections on the success and failure of the programme produced as well as the difficulties and challenges faced in producing it. The final report is then subjected to assessment by the CRFC.

In France, the assessment and monitoring criteria are built into the application procedure which requires an overview of accounts as well as the programme output for the previous year.

In New Zealand, stations are monitored through quarterly reports. For the purposes of accountability, the stations submit quarterly reports to account for their use of the funding granted to them. The report requests declarations on the number of section 36c hours of programming which have been broadcast in the preceding quarter. It also requires details of first run programming; programming that is locally generated; repeat programming; network programming and community-based programming. NZOA has access to the station's computers to track schedules and the inclusion of section 36 programming in those schedules. Stations also provide quarterly and annual financial statements on output costs which allow NZOA to assess the amount of section 36c programming it achieves through its subsidy.

As noted, there is significant concentration on the efficient use of programme funds with little consideration of the actual impact of that funding in the contexts of the wider objectives of community broadcasting. In Canada there are efforts being made to develop an 'outcome'-based criteria for measuring the overall success of such forms of funding. Whereas resource and output monitoring is important, it is also important to develop metrics which assess the impact of funding on volunteers, stations and communities in terms of growth and development.

Training dimensions

Each of the programme funds contain both explicit and implicit commitments to training as a key objective of programme production support. For the core operational funds of Denmark, France and New Zealand the training of both staff and volunteers is an integrated element of their annual subsidies. Training can be developed for staff, volunteers and access broadcasters. The project-based funding of Canada and Austria have explicit commitments to training aspects.

As noted, the Austrian fund has a specific training dimension, with 10% of the fund dedicated to this. 10% of the fund is utilised for the subsidy of training and educational endeavours. The purpose is to upskill both managers and employees in production, technology and executive skills. This can involve staff accessing existing training programmes in the fields of journalism, education, technology and business with the potential of the further transfer of these skills to participants in the broadcasting station, or the provision of specified community media training at station level.

Eligible costs for institutional training and trainee's costs as well as travel expenses are attributable. Added to this, expenditure incurred in relation to the provision of materials and equipment can also be calculated, as can the depreciation of these tools and equipment. Consultancy costs in relation to training provision can also be charged, along with the administrative, rent and overheads costs of running a training programme. Trainees can also charge for hours of training as hours worked, both in terms of training and preparation. The training aspect of the fund, however, has been criticised by the VFRO for not recognising the collective nature of training exercises in the sector. Because it is difficult for individual stations to organised relevant training, few stations have applied for the fund.

In Canada, at present, CRFC funding for programming is directed towards increasing the capacity of the broadcasters to make programmes. Funding is provided for specific programming but the process of making those programmes must have training and/or a learning components. Funded programming is thus predicated on training initiatives that include the 'radio talent development scheme' and the 'youth internship development scheme'. The core component of each of these schemes is, according to the CRFC, training and local programming. Each of these schemes has an allocation of $80,000 (€57,568) per year. These schemes enable programme production wherein training occurs on the production projects. For example, one grant involved the training of a news director for a station's new output. The training enabled studio news output and has also ensured skilled personnel are in place at the station long after the funding allowance has diminished.

In Denmark, there is no explicit statement of the training dimensions attached to the programming grant. It is not a criterion for adjudging applications, prior performance or reporting expenses. However, Denmark has a record of strong support for volunteers.

In France, the training dimension of community broadcasters is emphasised in the additional selective grant. Vocational training for employees and consolidation of jobs within the service as well as providing for upskilling and employment opportunities are key criteria for achieving the grant. The selective grant can provide funding with a value of up to 60% of the operational subsidy and thus acts as a considerable incentive for stations to develop training initiatives.

In New Zealand, the emphasis is on the access dimension of funding, wherein groups and individuals need training and facilitation in order to get on air. There is also a strong recognition of the place of volunteers in providing community programming and this is also emphasised. Every station has to take responsibility for the training of their volunteers and their programme makers; that is, a central element of the station and the majority of the ACAB conference is dedicated to training issues. The training initiatives of the broadcasters are a feature of the quarterly reports for NZOA as well as the annual application. Broadcasters can list and amortise training initiatives under their staffing costs for the year.

Training for community members, staff, volunteers and those who use stations as access broadcasters is a pivotal dimension in ensuring that programming entails the greatest degree of community participation possible and that stations retain community contact. For the core operation funds of France and New Zealand, training is part of the conditions of the retention of the operational grant. In France efforts have been made to incentivise training initiatives through the selective grant. In Canada, training incentives are incorporated into the grant award criteria. In Austria 10% of the fund is explicitly dedicated to resourcing training.

Spread of funds across the sector

The issue of how funds are distributed across the sector is of central importance to the development of the community radio sector. The distribution of limited funding is a point of deliberation amongst regulators and community radio representatives. There are many cross-cutting issues in relation to whether funding should be equally distributed amongst the sector; whether funding decisions should reflect need or merit; whether station licensing should be capped until the available resources are expanded to support additional stations; and whether the 'needs' of smaller, less resourced stations should be offset against the needs of larger, more resource-intensive stations.

In Austria, the first funding round of the new scheme granted funds to each of the community radio stations in operation. Before the scheme was fully implemented the RTR and the VFRO undertook negotiations around the way in which the fund would be distributed. Whereas initially the VFRO requested equal funding for each of the radio stations, the RTR refused this on the basis that it reduced its discretion in awarding funding on the basis of merit. Whereas there are now different amounts of funding awarded to stations, the RTR has agreed to keep the disparities to a minimum until it develops a policy on the distribution of funds. Both the regulator and the community radio representative organisation accept that there are subtleties in how funding should be awarded. In relation to the training and research grants the criteria are entirely merit based.

In Canada, the question of distribution of funding has also led to policy changes. As a limited contestable fund the question of distribution relates to whether applicants for funding should be judged on the basis of need as well as merit. In the first round of programming for production funding 'need-based' criteria were included in the assessment of applications. Additional criterion for funding decisions in 2009 was as follows:

- The geographic location of applicants and whether they were in urban or rural/remote areas;
- The availability of other funding, including assessing whether a small population base leads to limited listener donations and/or advertising;
- Access to other grants and bursaries, such as provincial subsidies or local levies;
- Existing revenue versus self-identified needs; and

- Where applicable, sustainability of the proposed project or resource after the conclusion of the contribution agreement.[89]

In 2010, the CRTC ceased to operate the above need-based criteria of their grant decisions. The rationale was that measuring for need above the merit of any given proposal led to subjective interpretations of need. The committee decided it was not good policy to base funding decisions on what effectively amounted to judgement calls.

In Denmark, the funding is distributed on the basis of eligibility and independent production hour commitments. Many licences receive the top rate of funding for 15 hours per week of independent production funding. According to the regulator, stations that do not apply for the full 15 hours per week do not want to commit to onerous production demands. However, such stations can increase their independent production with each annual application round. Stations that overestimate their production capacity for the coming year are obliged to return funding if the hours were not produced. According to the regulator, the system is based on the capacity of stations to produce independent programme hours and that can increase over time, allowing for the fact that available funding increases capacity.

In France, the CSA sets funding bands against which the operational funding for stations are measured. The operational grant is calculated on the basis of yearly operational costs of the radio station that correspond to a sliding scale of grants as developed by the CSA. The level of subsidy is also linked to the non-commercial revenue raised by the stations with the intention of rewarding fundraising activities by the stations. The selective grant is discretionary and is intended to encourage the development of stations. According to the FSER, development can only occur after core operations are stable and sustainability is guaranteed.

In New Zealand, the question of fund distribution has been dealt with through the development of four tiers that reflect the geographical and demographic contexts of each of the access community stations. According to the funding body NZOA, the distribution of funds is an attempt to weigh up questions of need with questions of policy. If the smaller rural stations had to compete for

[89] CRFC (2009) CRFC Annual Report.

funding with the larger stations then they would have a hard time achieving that funding and thus achieving their goals, thus undermining public policy. Yet recognition has to be given to the higher resource demands of stations located in urban areas with complex communities to serve. The tiered structure of funding is an answer to that particular conundrum. The position of NZOA is that they do not want too great a disparity between funding for different stations, but a station that is producing 20 hours of Section 36 programming a day is probably more worthy of money than a station producing much less. This is where the funding differential is focused and representatives of the sector consider it to be equitable and legitimate.

The issue of the spread of funds across the sector is one that is of concern for all of the regulators and community media representatives interviewed for this research. There is consensus that funding differences should be minimised if possible but differences in the contexts and performance of different radio stations cannot be ignored. The solution in France and New Zealand has been to create funding bands that reflect different stations' demographic/geographical contexts as well as their capabilities. In Denmark, funding amounts are tied to the number of licences a given station entity holds and therefore reflect the capacity of given stations. In Austria, the regulator is consulting widely to develop a policy in this regard whilst keeping funding differences to a minimum until that time. A related issue is the degree to which capping or limiting funding may prevent the issuing of new licences in the sector, thus constraining the expansion of the sector. In New Zealand, there has been little expansion of the sector, and there is unlikely to be unless more funding is made available to NZOA. There is thus an inherent tension in relation to the growth and sustainability aspects of 'development' of the sector.

Developmental issues

How do the separate funds contribute to development within the sector and which elements of each fund work best to ensure a developmental trajectory? Once again to answer this question it is necessary to link the question of development to sustainability. The community radio sector is still at an emergent phase and the principles and practice of its development are still formative. For this reason an important step to development of the sector is the establishment of a stable organisational, social, regulatory and financial base for the sector in each of the jurisdictions in which it has developed. Ensuring sustainability is one of the first steps towards development of the sector.

Arising out of the research three consensual positions are recognisable in relation to how production funding can ensure sustainability and development for community radio. The first consensual response that emerged from the research is that production funding, whatever form it takes, should be in itself predictable and sustainable. Broadcasters should be able to rely on forms of funding once certain criteria are fulfilled in its attainment. The position is summed up succinctly by Keith Collins of the funding body NZOA in his discussion of the importance of NZOA's financial support for the sector:

> Giving the stations a level of financial certainty is core to development; they can plan, generally there are no sudden moves; and they can plan fairly well, 3 years out, knowing that they will have within a ballpark, a certain level of funding to play with. They also have to generate a certain level of revenue themselves; but I think that helps. If you are in an environment and your funding is hand to mouth each year that might make it difficult to plan; and it would be a disincentive for any longer term initiatives; our fund incentivises stations to think for the future.[90]

A second position that emerged was that whatever form production funding takes, every effort should be made to ensure that long-term benefits of funding stay with the broadcaster/station long after the programming has been broadcast. This relates to the concept of capacity building and the potential for elements of funding to stay with a given station or operation long after a project or programming has been produced and broadcast. Whether funds are operational or project-based, funders should target the build-up of a station or station capacity (staff, volunteers, technology, training) as a key funding objective. Funding will thus ensure benefits into the future related to the key goals of access, participation and community-based programming within the sector. This overall logic is well summarised by Kevin Matthews of the NCRA in Canada:

> Whenever funding comes along that is tied to the production of a service, the station had to develop a project which fits the criteria of a granting body and then execute the project and then all or almost all of the money that comes in from the grant is spent on the project, and then once the grant is finished the station needs to continue

[90] Interview, Keith Collins, Community Broadcasting Manager New Zealand on Air, 2010.

> the project under its steam, or abandon it and that is not a particularly sustainable model for things. The main criticism we have heard from stations in regards to applying for the existing project funds is that they sometimes find it hard to justify to spend the time applying for project funds when the project is going to come and go and it is not going to be a net revenue for the station and in fact it is going to cost them money in putting staff on in overseeing the project, developing and supervising.[91]

In both Austria and Canada, which currently work under project-based funding schemes, there was strong support for the incorporation of core funding-type benefits into project-based schemes in relation to training initiatives, volunteer support and station development.

A third position that arose was the need for production funds to find a necessary marriage between the regulatory demands of accessing public funds and the core purposes of funding community broadcasters in the first place. Whereas it is necessary for funding to be efficient, transparent, fair and proportional, it was also necessary that these criteria recognised how efficiency, transparency, proportionality and fairness all contribute to the achievement of the specific aims and goals of community broadcasting. This requires sectoral interpretation of what can sometimes be thought of as universally applied regulatory requirements and a flexibility of approach in their implementation. The argument is made by Kasper Lindhardt of the broadcast regulator RTB in Denmark in his defence of the relatively uncomplicated nature of the Danish programming fund:

> The simple and straightforward nature of the criteria is giving the stations the time to develop content that they find interesting and in the direction that they want. This is the best way to facilitate local democracy and local freedom of speech. This is not the hardest part of our job, not the funding part of it. In the general picture the community radios are surviving and keeping up their service provision and expanding.[92]

Beyond these larger consensual points it is clear that no two schemes are the same. It is thus appropriate to reflect on some of the clearly articulated policy criteria that emerge in relation to the potential developmental trajectory of production funds and how the key elements of those funds, in terms of procedure and criteria, may adapt to sustainable and developmental dynamics.

[91] Interview, Kevin Mathews, Executive Director, National Community and Campus Radio Association, 2010.
[92] Interview, Kaspar Lindhardt, Head of Secretariat Radio and Television, Danish Agencies for Libraries and Media, Ministry of Culture 2010.

The objectives of any fund should be clearly linked to the overall objectives of community broadcasting and community broadcasting policy within any given jurisdiction. Part of the objectives of production funds should ensure that funding is at least partly oriented towards station capacity building. This ensures long-term efficiencies in funding are attained insofar as stations will be equipped with more capacity to produce more programming as a result of the funding. Whereas core operational funds are based on this dynamic, project-based funding can attain similar outcomes. The Austrian fund demonstrates how this can be achieved in a project fund. The use of funding for training and research as well as studio-based programming strands all relate to capacity-building criteria. The Canadian fund also shows how capacity-building dynamics can be retrospectively built into funding criteria.

Some level of predictability and security of funding is desirable to ensure sustainability within the sector. This can be achieved by linking funding to eligibility criteria and ring-fencing funding so that the sector has clear entitlements and knowledge of potential funding in a given year. Meeting eligibility criteria does not necessarily have to guarantee access to funding but it can be an element of the assessment for funding. Regulators can still maintain discretion in funding awards by building in funding bands (Austria, France, New Zealand) and additional performance-related criteria (France).

Flexibility is an important criterion for funding. As stations develop in different geographical situations with different demographics to serve and have attained differential levels of growth relative to these factors, their needs are different. A strong aspect of the emerging Canadian fund is the degree to which it sees the need for 'project-based' funding being mixed with 'operational-type' funding within a single funding scheme. One station may need resources to fund a community-based journalist; a larger station may need project funding for an ambitious access strand of programming. These different needs should be assessed on a case-by-case basis and therefore each fund should have the requisite flexibility to deal with that. In New Zealand the interchangeability of access and community-based programming to different levels requires flexibility based on need and capacity.

The procedural basis of funding in relation to applications, awards and monitoring of funds should be productive encounters. These are opportunities for the sector to learn and evaluate its own performance. Funds should provide feedback on applications as well as ensure transparency in relation to award criteria and judgements made for funding. Publication of judging panels as well as marking grids for project awards are productive endeavours. Most of all, the process of applying and securing funding must avoid creating opportunity costs for the community broadcasters wherein excessive administrative and staff resources are utilised in pursuing funding. The Canadian model is once again instructive in this regard. The procedure has a developmental agenda.

The funding is productive when it does not constrain the broadcasters in relation to their choices of programming. A degree of autonomy in project development is necessary to ensure that broadcasters produce programming which fits the overall identity and schedule of the broadcaster. Prescriptive programming choices can create unevenness in scheduling as well as impacting on the workflow of radio stations as resources are dedicated to achieving required aims in individual programme units as opposed to across the schedule. The Austrian fund, which allows for the development of studio-based 'flow' programming as well as self-contained 'stock' programming, is an example of a scheme that is sensitive to the characteristics of community radio broadcasting insofar as it allows for specific projects to be produced in a format which benefits the overall sustainability and development of the radio station.

Ensuring a degree of equity in terms of funding of stations is also important to the overall development of the sector. In Denmark, France, New Zealand and Austria there are various mechanisms for ensuring that community radio stations do not access a disparate amount of production funding. Funders must recognise the disproportionate resources available to community broadcasters and the uneven level of development across the sector. There is, however, an acknowledged difficulty in calculating/equalising the needs of given stations without penalising the efforts and needs of stations which have to operate in more resource-intensive environments. Creating tiered funding opportunities is one possible way, as in New Zealand and France.

Lastly, regardless of fund type there is an observable vacuum in terms of appropriate metrics developed to specifically measure the performance of community broadcasters relative to their access productions funds. Community broadcasters produce social relations, access, and participation in community-oriented mediated communication, yet most funds have no means of measuring any of these outcomes. The initiative from the CRTC towards the generation of an outcome-based model of assessment, wherein change to communities, volunteers and community broadcasters as constituents of community are evaluated as outcomes of funding, is a positive development for the sector.

Chapter Six – International Funding Schemes and Sound and Vision

The funding of support for programme production in the community sector is a policy issue which is generating more interest as the sector is increasingly recognised as a third pillar of broadcasting, complementary to both public service and commercial broadcasting.[93] For the most part, community radio and television has, since the 1990s, become recognised in policy in many jurisdictions. However, the issue of how different state-mandated schemes may support the programme production capacity of community broadcasters in a way that develops and sustains the sector has not been the focus of sustained research up until this point.

In international terms programme production support measures are operational in a limited number of jurisdictions and make up one revenue source in a complex matrix of community radio funding. The development of programme production support funds can be seen as a benchmark of the degree to which the community sector has become formalised in the broadcasting policy of different jurisdictions. The presence of a mechanism for supporting programme production schemes is indicative of a policy-based engagement with community broadcasting as part of the fabric of the wider broadcasting landscape. In Ireland and the countries surveyed there is evidence of a high degree of co-operation and dialogue between the regulators and the community radio sector.

No two support models are the same. Given the varied economic, political and sociocultural contexts and the particular histories of broadcasting and the community dimension, different approaches to the support of programme production have emerged. Added to this each of the support models can be seen as evolutionary in terms of how they develop over time in reaction to fundamental changes and ongoing knowledge about the operation of the sector. However, the fundamental logic of the support schemes are comparable insofar as they recognise that programme production funds help to achieve the policy objectives surrounding community radio broadcasting, even as the objectives may vary in each jurisdiction. There are structural

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[93] European Parliament (2007) The State of Community Media in the EU, Directorate General Internal Policies of the EU www.europarl.europa.eu/meetdocs/2004_2009/.../691771en.pdf,(Accessed 06/12/10)

consistencies in the similarities and difference across the different models. Key structural differences include:

- Whether or not potential funds are exclusive to the community radio sector;
- The relative security of the source of funding (whether from the licence fee or from commercial revenue) and the political influence over fund schemes;
- Whether funds are based on a 'project-by-project' basis or core 'operational funding';
- Whether funds are equalised across the sector or differential;
- How funding schemes balance issues of 'sustainability' and 'content' objectives in programming cost assessment/award criteria/performance measurement;
- The developmental objectives of funding;
- The degree of prescription in the funding criteria relevant to programme genre/types/categories; and
- The methods of assessment for the disbursement and use of funds.

Policy recommendations for the Irish scheme

One of the purposes of the present research was to assess how policy or process developed in other jurisdictions may have specific relevance for how the Sound and Vision scheme for Irish community radio supports development/ sustainability for the sector in Ireland. Whereas it is acknowledged that Sound and Vision has many benefits for the community radio sector, it is worth reflecting upon possible policy transfers which would improve the scheme. Three caveats need to be added here. First it is accepted within comparative policy research that policy can rarely be directly transferred from one policy context to another. Instead, elements of policy that are likely to work can be adopted, whereas policy that is desirable but unlikely to work in a different environment can be adapted to a new environment. Secondly, it must be acknowledged that Sound and Vision is not a dedicated community radio production fund in the way that the other schemes are. As was pointed out in Chapter Three, Sound and Vision was developed to support independent production and broadcasting in Ireland but does contain recognition of the specificities of the community media sector. Lastly, the wider contexts of public funding need to be considered when looking at any particular 'production' funding scheme. If there are project-based funding or support schemes for different aspects of community radio sustainability available

from different sources, these may replicate the various elements of funding initiatives. However, in contrast to centralised funding, they may also lead to gaps in provision.
There are elements of each of these funds that answer the three key policy goals of ensuring

1. Predictability and sustainability of funding;
2. Attention to capacity building, content production and community media production procedure within funding; and
3. Transparency, efficiency and fairness combined with flexibility in content requirements.

Policy recommendations break down into three categories. The first category involves the structural dimensions of funding support for community radio. The second category refers to specific procedural aspects of funds in other jurisdictions which may be adapted by the BAI for the Sound and Vision Scheme. As outlined in Chapter Five, there are procedural elements of the application process and grant assessment procedure. Lastly, the chapter will address some of the emerging issues for both policy makers and the sector which may be considered as emerging policy issues that could be dealt with collaboratively at a pan-national level.

Structure of Funding

There are structural dynamics of funding schemes which address some of the key policy issues faced by the sector as well as ensuring sustainability along the lines of social, institutional, financial and technical dynamics. The following are some structural dimensions that meet the policy issues outlined above:

- Dedicated funding schemes for community media;
- The availability of operational funding, or alternatively
  - ➢ Operational funding for determined programme hours as opposed to ‘specific projects’ (Denmark)
  - ➢ Funding for programme strands as opposed to defined ‘stock’ programming (Austria);
- Ring-fenced ‘radio’ funding (Austria, Canada and France); and
- Funding based on successful retention of a service licence in conjunction with project proposals (All except Ireland and Canada).

Whereas many in the sector and amongst the regulators perceive core funding to be the most effective way of ensuring the key policy issues outlined above, for multiple reasons core funding is no longer politically possible in many jurisdictions. There is also strong indication that both the regulatory bodies and sector representatives would like to see funds that address capacity building, content, and procedural aspects of community media production. In the case of Ireland, European regulation on state aid would make the implementation of core funding a difficult task. However, the principles of core funding can be adapted for project funds on the basis of capacity, content and procedural criteria.

The case of Denmark is instructive. In Denmark, operation funding is provided for determined programming hours which introduces a degree of transparency and measurability into the scheme. Fifteen hours of independent programming is funded through operational grants for staff/fixed costs and production costs. Thus 15 first-time broadcast hours are funded but the onus is on the station to find funding for the rest of its original programming. However the 15 hours builds station capacity to generate further programming because of its focus on operational costs.

In Austria, the scheme is nominally a project-based grant but also entails 'operational dynamics'. This is most obvious in the way the fund has a three-way split in relation to content, training and research grant support. Training and research are there to support the development of the capacity of the sector and its development of content. In relation to the content stream, broadcasters can apply for funding for 'production and broadcasting of programmes, series, parts of programmes and/or projects, which may lead to the broadcast of programmes'. This allows broadcasters to specify generic programme strands in their funding applications, that is, projects that do not have to be tightly detailed on an episode-by-episode basis. This is a flexible approach to content production. It gives broadcasters the freedom to develop programming relevant to schedule needs and based on studio resources that already reside with the station. It also allows for broadcasters to use funding for development of programming. This formal approach to funding programme strands could be beneficial in allowing Irish community broadcasters to balance the production focus of their projects with procedural issues such as training and upskilling volunteers, and capacity building such as developing the station and technical side of operations. There appears to be few legislative and regulatory barriers to adapting such an approach in the Irish scheme.

Ring-fenced funding is also a structural means of ensuring that the sector can anticipate the availability of funds on a year-on-year basis. In Austria, the fund for Non-Commercial Media is a dedicated fund where the amounts for radio and television are separated. Whatever way the funds are then disbursed, the sector can depend on a set amount being availed of in any given year. In the varied schemes discussed above, Ireland is the only scheme where there is no ring-fenced amount for the sector. It would be beneficial for the BAI to develop a separate scheme to Sound and Vision, which would be dedicated to the sector. This of course would also allow for the development of criteria/procedure targeted to the community media/radio sector.

A further structural feature of funds is the linking of eligibility for funding to actual programme/project grants. This is the situation that pertains in all cases except for Canada and Ireland. In France, New Zealand, Denmark and Austria, those stations which are eligible for funding can expect to receive funding once they fulfil certain criteria related to organisational, procedural and content requirements. This is a means of encouraging efficiencies in these areas over time in the expectation of receiving funding. It does not preclude the awarding of differential amounts for applicant projects and, as is the case in New Zealand and France, awarding funding on the basis of differential scales. Linking eligibility to funding in the Irish context would encourage efficiencies on a longer term and provide some degree of secure funding for the different stations.

Procedural Aspects

The research also addressed procedural aspects of each of the funding schemes. The broadly positive principles of procedural aspects of each of the funding schemes are as follows:

- Annual funding rounds with potential for multi-annual funding (New Zealand);
- Streamlined application process/clarity of criteria/independent but public judging panels (Canada, France, Denmark);
- Varied hybrids of content, procedural and operational criteria (Canada, Austria, France);

- Operational and content monitoring linked to political legitimation of guaranteed grants (Denmark, New Zealand, France); and
- Spread of funds across the sector (France, New Zealand).

Firstly, a structural feature, which is linked to the procedural aspects that will be dealt with in the next section, is that of frequency of funding rounds. In all of the funds surveyed in the previous chapters the application process is based on a yearly submission cycle. Thus funding is awarded for an entire year. It was argued in relation to this cycle that this allowed broadcasters to plan ahead for the entire year and cut down on the procedure involved in applying for funding. Regulators were sympathetic to the concept of multi-annual funding wherein large-scale broadcasters with ambitious programming plans could benefit from funding awarded for more than one year. However, it is only in New Zealand that the regulator is planning on moving towards this model. It would be beneficial for Irish community broadcasters to move to an annual funding round, cutting down on application procedure whilst allowing for budgeting for programme production for an entire year.

Following on directly from annual funding rounds, one of the key procedural aspects of the fund is the need for streamlined application processes which attempt to be equitable and fair in disbursing funds. Perhaps one of the most streamlined funding application processes for a project-based fund is Canada's CRFC. There is a six-week period of assessment for each of the applications, which is clearly outlined and made publicly known. The process also contains a midway point wherein the judging panel can request further information from the applicants. The applicants have one week to reply.

In the Canadian fund, the criteria for funding judgements are clear, publicly available and contain weightings for different aspects of capacity-building criteria, content production criteria and community media production criteria (e.g., the CRFC criteria: Timeline (5%), Training, Mentoring and Education (25%), Local Content (25%), Budget (10%) and Value and Relevance (35%). Including weighted criteria which cover the varied aspects of capacity building, content development and community process could also be more directly incorporated in the Sound and Vision criteria for awards for community radio production.

The Canadian scheme as developed by the CRFC also appoints a publicised independent judging panel which has direct experience or knowledge of the community sector. In the French scheme there are two panel members directly appointed by the community radio association, SNRL. In both Denmark and Austria there are special committees on local broadcasting that advise on the disbursement of funds. There are two issues here: the transparency of the award process and the competency involved in assessment. In Sound and Vision both of these beneficial aspects of procedure have been intermittently present but could be further formalised and more consistent in relation to their application.

In relation to the monitoring of the various schemes there are similarities across the board. All of the schemes incorporate a mechanism for withholding funds until the successful completion of projects. All of the schemes involve a retrospective element of overseeing how the funds were used in the successful completion of programming. The importance of the monitoring process is linked to the need to ensure political and public legitimacy for funding. However, the monitoring process can also have a productive dimension insofar as it encourages the continued application of community media operational dynamics in relation to the organisation and maintenance of stations.

The final procedural issue that arose in the research also has a structural dimension as it relates to the distribution of funds across the sector. In both France and New Zealand there are formulae to allow for different amounts to be allocated to broadcasters on the basis of either their potential service area and demographic make up (New Zealand) or on the basis of their potential to raise funds combined with service area size (France). In Denmark there is a spread of funding relative to the amount of licences that each operator holds, with funding thus reflecting the capacity of the different licensed operators. In Austria there is an informal agreement to ensure there is not too much disparity in funding until more rigorous formula is worked out. In each case, the policy focus is to ensure that broadcasters develop relatively evenly across the sector.

Distributing funds across the sector requires working out a careful formula that could take into account 1) the ‘needs’ and the ‘merits’ of the applications received (Canada, 2009-2011), 2) the accomplishments of stations in raising their own funding (France), 3) the varied operating contexts of different stations (New Zealand). A blunt but effective measure for ensuring a spread across broadcasters is to impose a cap on the amount of funding that can go to one station. The cap should be sufficiently high to allow a station to succeed on the basis of the merits of its proposals (this is the case in Austria). This is something that could be adapted in the Irish funding scheme relative to the issue of eligibility for funding.

Emerging policy issues

In conclusion, there are three policy issues that can be termed 'emerging' policy issues that were articulated in the course of this research. These were policy issues that were raised by both regulators and community media representatives. In each case these policy issues have yet to be dealt with through policy within the different jurisdictions. The first issue was that of the possibility of developing flexibility of funding. Here the key issue is the different needs of different stations operating in different contexts. The argument is that for certain stations, for example smaller stations, it may be more beneficial to fund training and outreach that leads to content production as opposed to direct content production. What is at issue here is the degree of flexibility that funding agencies have to mix and match funding relative to capacity building, content quality and community media production procedure in the funding round. Development of policy in these areas will have important consequences for the varied sustainability issues of stations operating in different contexts.

The second emerging issue is one related to the metrics used to assess the success or otherwise of funding for community radio programme production. As has been mentioned in the report, there is a concern that within existing policy the metrics are based on output/operational approaches as opposed to measuring outcome. There could, however, be some combination of the two. An outcome-based approach would be concerned with developing metrics to assess how funding is contributing to volunteer development, station development and community development. All of these are different aspects of what community media attempt to achieve in their operations. Along with flexibility of funding this is a potential area for cross-national development of a policy response.

The third policy issue is related to the media environment and technological change. One premise of a sustainable sector is that it will remain relevant in a changing technological environment. In an evolving digital radio environment broadcasters will have to negotiate their place in a scenario which will involve continued broadcasting on FM as well as DAB and online. Negotiating a changing technological environment has planning and development costs as well as production costs. These adjustment costs have production implications which could be addressed in current programme production funds.

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Appendices

Appendix 1 – Short Community Sector overviews

Austria

The development of the community media sector in Austria can be traced to the 1970s with the emergence of pirate radio stations. Some of these stations articulated political and social concerns with the need for plural media operating at local level. In the 1980s and 1990s these stations and varied activists formed the 'pressure group free radio' to campaign for recognition of local non-commercial broadcasting. Following a challenge to the state monopoly by local radio activists and local media commercial interests, the Law on Regional Radio of 1993 became the basis for the first local radio licences distributed in 1995.[94] The first licences were allocated to commercial interests but a challenge to the constitutional court finally made way for new legislation and licences for local non-commercial radio in 1997. The newly representative association of the VFRO (formed in 1993) was instrumental in securing this decision. In the period from 1998 to 2000 many of the now established community radio broadcasters received their licences.

Canada

The Community broadcasting sector in Canada has been recognised and regulated within Canadian broadcasting policy since 1991. In the Broadcasting Act of that year key objectives of policy in Article 3 stated that radio services needed to include not-for-profit stations and that 'radio must provide a service that is of interest to local communities' and must provide 'educational and community broadcasts'.[95] This firmly established community broadcasting as a distinctive sector of the media landscape. As in other countries, legislative recognition of the sector has entailed due right to consideration in related and subsequent media policy. The Act also placed the sector under the regulatory supervision of the CRTC. In 1996 public consultation on broadcasting policy recognised the necessity of respecting the substantive difference between community broadcasters and commercial/public broadcasters, in relation to issues such as stations remits, the role of volunteers in programme production and the production of alternative

[94] Purkarthofer, J., Pfisterer, P and Busch, B. (2008) *10 Years of Community Radio in Austria; an explorative study of open access, pluralism and social cohesion,* Austria: RTR.
[95] 1991 Broadcasting Act, Canada, available at laws.justice.gc.ca/eng/B-9.01/page-1.html, [Accessed 01/12/10].

content[96]. In 2000 the CRTC overhauled the policy framework for community broadcasting. The new policy provided a clearer delineation between campus community radio and community radio. As of July 2010 the Canadian policy framework for community radio was re-visited again. On this occasion the policy review focused exclusively on the community media sector and generated some important changes in the overall framework. Of most relevance the framework provides further definition of the sector; simplifies some of the differentiation between different types of stations (community and campus); clarifies programming requirements for community radio; outlines the role of volunteers; and sets out a new approach for funding community radio through the Canadian Content Development (CCD) fund.[97] This latter element will be dealt with in the section below. The definition of community radio now reads as follows:

- The Commission considers that campus and community radio distinguishes itself by virtue of its place in the communities served, reflection of the communities' needs and values, and the requirement for volunteers in programming and other aspects of station operations. This helps ensure that the programming is different from that of commercial and public radio. The programming of campus and community radio should distinguish itself from that of the commercial and public sectors in both style and substance, offering programming that is rich in local information and reflection. The programming provided by campus and community radio should meet the needs and interests of the communities served by these stations in ways that are not met by commercial radio stations and the Canadian Broadcasting Corporation (CBC).

- A campus or community radio station is owned, operated, managed and controlled by a not-for-profit organisation that provides for membership, management, operation and programming primarily by members of the community served. In its openness to community involvement, campus and community stations offer ongoing opportunities for training in the operation of their station to volunteers from the community served.

[96] Public Notice CRTC 1997-104 of 1 August 1996: An Agenda for Reviewing the Commission's Policies for Radio, Canada: CRTC.
[97] Broadcasting Regulatory Policy CRTC 2010-499 Campus and Community Radio Policy.

Denmark

Broadcasting legislation introduced in 1997 recognised non-commercial local broadcasting as a category of public service broadcasting and enabled access to dedicated funds derived from the licence fee (previously exclusive to Dansmark Radio and TV2).[98] The funding was topped up by a levy on local television stations which had become part of a commercial network, bringing the fund to €6.7m per annum. In this period the Board for Local Radio and TV (which had previously distributed lottery funds to local broadcasting in the period from 1994 to 1997) was reconstituted with the increased funding to distribute to the local media sector. The fund was initially developed as a subsidy for operating costs and was calculated on the basis of total programming hours. In 1998 the emphasis shifted to balancing core operation funding with 'project-by-project' funding, wherein each station applied for funding on the basis of specified programme hours. This entailed a reduction in the amount of funding available for core operation and a redistribution of those funds towards 'project-by-project' contestable funding. Following an extensive evaluation of the funding scheme in 2002, the fund was once again restructured to combine project fund with operational funding.[99]

In 2006, a change of government and a new media policy framework emerged to cover the period from 2006 to 2010. Funding was boosted and the value of the local and community sector was reasserted in government policy.[100] However, the period also ushered in prolonged debate about the future of the sector and its potential finances. Public Funding is currently distributed and monitored by the Radio and Television Board (RTB) (the sector regulator) as legislated for by the 2006 Order on Local Radio and Television activities.[101] The Ministry of Culture oversees the RTB. Following the dual model of subsidies for operational and project-by-project funding, the subsidy, as reconfigured through the current media agreement (2006-2010) and the subsequent media agreement (2011-2014), works on the basis of providing operational funding for specified programme hours. It thus also has a hybrid nature.

[98] Between 1994 and 1997 the government created a 'Committee for Local Radio and TV' which disbursed grants (7.5m DKK per annum), derived from soccer lottery funding, to the local commercial and non-commercial sector. The funding was split into grants for core funding and also project-based grants and stations had to meet a number of criteria and commitments.

[99] Jauert, P. and Prehn, O. (2002) *Diversity and Quality. Evaluation of the subsidy scheme for local radio and TV*, Denmark: Ministry of Culture.

[100] Danish Government Media Policy Agreement 2006, Denmark: Ministry of Culture.

[101] 2006 Order on Local Radio and Television Activities, Denmark: Ministry of Culture.

France

The 1986 Broadcasting Act formalised the place of non-profit associational radio in French broadcasting policy. Article 29 of the Act defined associational radio as 'services published by an association and accomplishing a mission of social community proximity, understood as promoting exchanges between social and cultural groups, expression by socio-cultural groups, local development, environmental protection and preventing social exclusion'.[102] Within the Act these services are defined as Class A private radio services. In 1989 the CSA was created as an independent administrative authority to replace the CNCL. The CSA overhauled the framework for distributing licences to associational broadcasters, set up a new agency to monitor the performance of the sector and took on the administration of the FSER.

New Zealand

Radio New Zealand was set up in 1982 in Wellington, in response to pressure from ethnic groups looking for a station representing and enabling access to the airwaves for minority groupings. In 1988, Wellington Access radio was still the only access station in the state. The 1989 Broadcasting Act undertook a sector-wide restructuring of broadcasting and amongst other things created the legislative conditions for the development of the 'access' radio sector as well as the Commission, NZOA, which would become a major source of community radio funding. NZOA was legislated for as a Broadcasting Commission, formally established as a crown entity and funded by the public broadcasting fee and later, following the scrapping of the licence fee in 1999, central grants. The core remit of the agency is to reflect and develop New Zealand culture and identity and, crucially for the 'access' sector, to ensure that a range of broadcasts is available to provide for the interests of 1) women, 2) youth, 3) children, 4) persons of disability and 5) minorities in the community including ethnic minorities.[103] The new commission was to achieve its objectives through the provision of competitive grants, which enabled broadcasters to meet varied strategic objectives, and audience needs as set out by the agency. The 1989 Broadcasting Act was then accompanied by a ministerial directive which required NZOA to make funds available for access radio as a key means of meeting its section 36 C objectives and from this point on these funds became a central financial support for the development of access radio. The

[102] 1986 Law on Freedom of Communication, No 86-1067, France.
[103] Ministry of Broadcasting, 1989 Broadcasting Act, Section 36, New Zealand 1989.

directive declared that it is part of the general policy of government in relation to broadcasting 'that access radio services should be available for a broad range of non-profit community groups'.[104] Collectively, these legislative and policy moves provided the framework for the recognition, licensing and funding of the access sector.

In 1999, responsibility for the non-commercial aspects of broadcasting policy and NZOA were transferred from the broadcasting ministry to the Ministry of Culture and Heritage, which, in 2004, developed a new policy framework for the sector.[105] The purposes of this framework were to differentiate access broadcasting from private commercial broadcasting. The policy framework was developed as access broadcasters were straying into programming areas, which were considered to be the preserve of commercial broadcasters. This framework was then later updated and replaced by a new 2006 framework for regional and community broadcasting which provides, alongside the broadcasting legislation, the current policy basis for access broadcasting in New Zealand.

[104] Radio Diversity (2009).
[105] Ministry of Culture and Heritage (2004) *Regional and Community Broadcasting Framework*.

Appendix 2 – Indicative interview questions, regulatory agencies

1. Your country/state operate a radio programme production support scheme whereby broadcasters/producers from the community/access/non-commercial radio sector can apply for funding/grants/resources, from a institution mandated by the state, for programme making. How does it operate?
2. Is this scheme open to all broadcasters in your jurisdiction or just community/access/non-commercial media initiatives?
3. What is the procedure/criteria for allocating funding to broadcasters?
4. Does the scheme have particular policy objectives associated with the development of community radio in general, e.g., station development, outreach development, volunteer training, etc?
5. Have there been any evaluations/modifications of the scheme since its inception?
6. Is funding allocated to each community radio station equally?
7. Does each station receive and utilise funding in the same way?
8. Does the programming which is produced under the fund/grant need to meet specific criteria under the operation of the scheme (e.g., programme genres, subject matter, scheduling requirements, etc.)?
9. Does the fund/grant differentiate between the origin/production of programmes (e.g., station-originated, community-based and/or commissioned)?
10. Under the fund/grant do community radio stations commission programmes from external programme producers? If so, how much?
11. Can the funding be invested in general programme-making capacity such as research and development, training, technology, etc?
12. How is the funding used by the radio stations?

Appendix 3 – Indicative interview questions, community radio representatives

1. Is there a dedicated radio programme production support fund/grant, available to community radio, which is overseen by the broadcasting regulator in your jurisdiction?

2. How is this community radio production fund structured?

3. Is the programme production fund/grant open to non-community broadcasters?

4. What areas of programme production are covered by the funds?

5. Does each station receive and utilise funding in the same way?

6. Does the programming which is produced under the fund/grant need to meet specific criteria under the operation of the scheme (e.g., programme genres, subject matter, scheduling requirements, etc)?

7. Does the fund/grant differentiate between the origin/production of programmes (e.g., station-originated, community-based and/or commissioned)?

8. Does the fund/grant take into account the method of production including acknowledgement of the role of volunteers, the role of station staff and input from the community?

9. Under the fund/grant do community radio stations commission programmes from external programme producers? If so, how much?

10. Can the funding be invested in general programme-making capacity such as research and development, training, technology, etc?

11. How is the majority of funding used by the radio stations?

12. Have community radio broadcasters experienced any difficulty with this model of funding programme production? If so what kind of problems?

13. If you had a choice what changes would your organisation make to the model of funding?

14. How does the broadcasting authority monitor each station's use of funds?

15. Does the model offer adequate support for programme production in the sector?

16. In your opinion does the funding/grant contribute to the continuing development of the community radio sector?

17. Please use this final box to add any information you consider may be relevant to our research.