

Providing a service in accordance with ‘Key Commitments’, Revolution Radio Limited

Type of case	Broadcast Licence Conditions
Outcome	In Breach
Service	Revolution Radio
Date & time	March 2022
Category	Key Commitments
Summary	The Licensee failed to fulfil the requirements specified in its Key Commitments with regard to the character of service. Breach of Licence Conditions 2(1) and 2(4).

Introduction

Revolution Radio is a community radio station providing a service for the diverse ethnic communities of Northampton. The licence is held by Revolution Radio Limited (“Revolution” or “the Licensee”).

Like all other community radio stations, Revolution is required to deliver ‘[Key Commitments](https://static.ofcom.org.uk/static/radiolicensing/Community/commitments/cr103405.pdf)’ (<https://static.ofcom.org.uk/static/radiolicensing/Community/commitments/cr103405.pdf>) which form part of its licence. These Commitments set out how the Licensee will serve its target community and deliver social gain (benefits to the target community), and also include a description of the on-air service.

Ofcom requested full 24-hour recordings for the week 7 March to 13 March 2022 to ensure that Revolution was complying with its Key Commitments to provide a service for the diverse ethnic communities of Northampton and to broadcast 126 hours of original output per week. This was following the [Breach Decision](https://www.ofcom.org.uk/data/assets/pdf_file/0023/228344/Providing-a-service-in-accordance-with-Key-Commitments,-Revolution-Radio-Ltd,-Revolution-Radio.pdf) published in November 2021 (https://www.ofcom.org.uk/data/assets/pdf_file/0023/228344/Providing-a-service-in-accordance-with-Key-Commitments,-Revolution-Radio-Ltd,-Revolution-Radio.pdf). We also requested full programme schedules for the week beginning 7 March 2022 and an explanation of how Revolution was meeting its obligations under its Key Commitments.

Having assessed the recordings, associated programme schedules and information from the Licensee, we found that the Licensee met its original output requirement. However, it appeared that Revolution was not delivering the following Key Commitment:

- “Revolution Radio will provide music, information and entertainment for the diverse ethnic communities of Northampton, including the Black British, Asian, mixed ethnic and non-British white communities. It provides a service that is accessible to build bridges between the marginalised communities it serves and a wider mainstream audience”.

Ofcom considered that this raised potential issues under Licence Conditions 2(1) and 2(4). These state, respectively:

“2(1) The Licensee...shall provide the service specified in Part I (b) of the Annex for the remainder of the licence period” and

“2(4) Subject to Condition 2(5) below..., the Licensee shall ensure that the Licensed Service accords with the proposals set out in Part I (b) of the Annex so as to maintain the character of the Licensed Service throughout the licence period”.

We requested comments from Revolution on how it was complying with these conditions.

Response

Revolution stated:

“Our target audience is able to interact with our presenters on every show, whether live or pre-recorded in which case comments are read out on the following show.”

“Our studios are in the town centre of Northampton on Abington Street, the busy main shopping street opposite the Market Square and we are now open every day during office hours for members of our target audience to come in and talk to us.”

“We also attend many local events and prioritise supporting those events which are targeted at our audience. These are an opportunity for us to have a visual presence and a chance for listeners to interact with us and let us know about issues that matter to them and give us their views on them.”

The Licensee provided detail on how it identifies its target community and the content that appeals to them, stating:

- “A continuous process of conversations with volunteers, presenters and visitors. Presenters from our target communities guide the

content on their own shows and ensure they are relevant and appeal to their community.”

- “We have instituted an on-going survey via SurveyMonkey to measure the appeal of our programmes to the specific communities they target – this data is divided into responses from each community so it is easy to check the effectiveness of what we are broadcasting.”
- “Feedback from our listeners which comes in a large number of ways including contact with listeners at events and at our studios and messages across numerous platforms.”

In its response Revolution also highlighted a number of programmes and features which it felt demonstrated its commitment to provide content for its target community and included information about specific programmes that included guests from the target community and groups related to those communities.

The Key Commitments state that the service “is accessible to build bridges between the marginalised communities it serves and a wider mainstream audience”. When asked to provide specific details on how Revolution is achieving this, it stated:

“...we have interpreted this part of our Key Commitments as meaning that the style of the content we broadcast (which is primarily aimed at diverse communities) should be accessible to the wider mainstream listeners in order for us to build bridges between these two sections of the audience.

In order to do this we have:

- Initially chosen not to ‘pigeon hole’ programmes on air, online or in our marketing materials as being for a particular audience. We should stress that although we have done so in this document to demonstrate that we are targeting these communities, we hope that every programme and feature we broadcast is presented in such a way that it appeals equally to all listeners
- Chosen to have all programmes broadcast in English
- Trained presenters to use inclusive language and ensure they are not discussing issues in a way which would exclude anyone not from their community, for example ensuring that they are clear about what they are discussing. We hope that by doing this, it will help mainstream listeners understand these important issues (e.g. experience of institutional racism or unconscious bias) from a different perspective
- Selected a music format which appeals to our target audience but has crossover appeal
- Designed the station sound and audio production of the radio station to be accessible and appeal equally to all listeners with a

mixture of accents on our voiceovers intended to represent some of the target communities.

- Adopted the slogan "Bringing Northampton Together" to underline our purpose in building bridges between diverse communities"

Revolution also stated:

"We recognise that there is still work to do with building direct relationships with our local communities so we can encourage them to approach us more formally and proactively with content and see us as a regular outlet for their messages."

Then further stated:

"We would also like to be clear that as a radio station which has only been broadcasting for a little over a year, we are still developing our output as new presenters volunteer, are trained up and lead to new programmes going on air. In fact, we have introduced several more programmes specifically targeted at marginalised communities since our most recent monitoring."

The Licensee also provided a list of community groups that it has reached out to.

Additionally, Revolution stated:

"We would like to point out that we have requested clarification on what would constitute compliance and Ofcom was unable to provide specific guidance as it is for the Licensee to interpret Key Commitments."

Decision

Reflecting our duties to ensure a diverse range of local radio services, community radio licensees are required to provide the licensed service specified in their Key Commitments. This is a fundamental purpose for which a community licence is granted.

Revolution's character of service states that it "will provide music, information and entertainment for the diverse ethnic communities of Northampton, including the Black British, Asian, mixed ethnic and non-British white communities." Ofcom's assessment of the recordings provided by the Licensee for the week 7 to 13 March, found there was insufficient content to distinguish the service from a service primarily targeting the general population of Northampton.

Revolution's character of service also states, "It provides a service that is accessible to build bridges between the marginalised communities it serves and a wider mainstream audience". Ofcom considers that this section of the Licensee's Key Commitments reiterates that the service serves "marginalised communities", and builds bridges between those communities and a mainstream audience, rather than a mainstream service which could also appeal to the "diverse ethnic communities of Northampton". It should therefore be clear on air that this is a service for its target community, the

diverse ethnic communities of Northampton, rather than a service targeting the general population of Northampton.

We do note that Revolution has provided details of steps being taken to provide a service that more closely reflects its Key Commitments, and there has been an increase in content targeting the “marginalised communities”, following Ofcom’s previous investigation, published November 2021. Additionally, we acknowledge that the Licensee states that it has introduced further programming for these communities since the week monitored.

We understand that the service has been broadcasting since 14 May 2021 (including up to 28 days of test transmissions) however we also note the period of time between the licence being awarded in July 2020 and the service launching, and would expect the Licensee to have used this time to be in a position to launch a service that fulfils the Key Commitments from the outset.

We also acknowledge the efforts being made by the Licensee to encourage communities to interact with the service both online or in person at the studio and by reaching out to community groups within the target audience in addition to attending and supporting events in Northampton. However, it is in Ofcom’s view that not enough content is broadcast by the Licensee to provide a service primarily targeting the “marginalised communities” of Northampton.

With regards to the Licensee’s request for clarification on the meaning of its Key Commitments, we would like to remind licensees that Key Commitments are a fundamental aspect of a community radio licence and are put forward by and agreed with each licensee from the outset and at each revision. This is made clear to all prospective licensees before they apply for a licence.

Ofcom’s Decision is that Revolution Radio Limited is in breach of Licence Conditions 2(1) and 2(4) for failing to comply with its character of service between 7 to 13 March 2022.

We expect the Licensee to work to rectify these issues immediately. This is the second time that Revolution Radio Limited has been found in breach of Licence Conditions 2(1) and 2(4) and **we are therefore putting the Licensee on notice that this contravention of its licence will be considered for the imposition of a statutory sanction.** We will monitor this service to ensure that Revolution Radio is complying with the Key Commitments.

Breach of Licence Conditions 2(1) and 2(4) in Part 2 of the Schedule to the community radio licence held by Revolution Radio Limited (licence number CR103405).