

# Compliance principles for Key Commitments

In our [statement on our future approach to Key Commitments](#), we published a set of compliance principles, designed to outline some of the things we would take into account when reviewing complaints about a station's compliance with its character of service obligations and off-air social gain requirements. An updated version of these principles are set out in full here. These principles apply to both community radio services, broadcasting on AM and FM, and community digital sound programme services, broadcasting on DAB.

## Ofcom's approach to assessing complaints

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- a) Ofcom's approach to assessing complaints about stations' compliance with their Key Commitments is to assess compliance over the course of a week, using recordings and written information provided by the station.

## Character of service

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- b) When considering compliance with character of service obligations, stations should ensure that it is clear from listening to their content who their target community is at all (or at least most) times. We expect that a station aimed at a particular ethnic minority, for example, would sound different from a station with a 'mainstream' character of service.
- c) Where not all programming is specifically created for their target community, licensees should consider the proportion of the service which is given to different aspects of programming. For example, licensees should consider the amount of syndicated programming or back-to-back music they broadcast compared to originally created content.
- d) Although there are no longer specific quotas relating to original and locally produced output from Key Commitments, we expect that most stations will continue to broadcast some original and locally produced output each day.<sup>1</sup> We would generally consider that a station broadcasting no content of this type would struggle to meet its character of service and deliver social gain for its target community. In the event of Ofcom assessing a licensee's compliance with its Key Commitments (as a result of a complaint or monitoring), a licensee must be able to demonstrate to Ofcom how the amount of original and locally-produced content it broadcasts enables it to meet its character of service and social gain commitments.
- e) In order to serve the target community, having presenters from the target community is desirable both in providing relevant content to meet the character of service and in meeting

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<sup>1</sup> For this purpose, we define original output as content created by the station broadcast for the first time, and locally-produced output as content created and broadcast from within the station's coverage area.

a station's social gain objectives. In any case, programming should appeal to the target community and reflect the character of service.

- f) Where specialist/specific programming is referenced in a station's character of service, we recognise that it might only form a small part of a station's overall programming. However, licensees should ensure that this programming is carried consistently and appropriately scheduled and signposted to ensure that listeners are aware of it and can benefit from it. For example, stations which include reference to health and wellbeing in their character of service should consider how this is reflected across the schedule, considering the most appropriate days of the week and times of day to broadcast the content, and how such programming is promoted on-air.
- g) Where languages are referenced in a station's character of service, we would expect some programming in those languages to be broadcast each week. This does not restrict stations from broadcasting content in other languages in addition to those specified in the character of service. The languages specified in the character of service should remain the dominant language(s) broadcast on the station.

## Studio location

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- h) Having a studio within the licensed coverage area is important for the delivery of social gain. Studio facilities are important for allowing volunteers and potential volunteers to access the station, to gain training and participate in the service, and for ensuring the station is accountable to its target community.

## Social gain

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- i) Stations are required to facilitate discussion and the expression of opinion, both in allowing presenters to use the station as a platform to express opinions, but also to encourage members of the community to engage in discussion. This could be facilitated through different types of speech programmes inviting and reflecting audience views (phone-ins/social media etc) or shows featuring content about current affairs, or with a journalistic slant. It could also be achieved through off-air events such as community forums.
- j) A central purpose of community radio is to provide education and/or training to volunteers and members of the community. Stations should consider how they conduct training – how regularly, what types of training they offer (which could be a combination of on-air and off-air skills), and how they make members of the community aware of the opportunities on offer. Stations should prioritise making opportunities available to local members of their target audience.
- k) There are a number of ways in which a station can promote a better understanding of its target community, including but not limited to: community-focused speech programming, hosting off-air events or forums, holding open days or extending broadcast interview opportunities to different community groups. Stations should endeavour, where possible, to ensure that volunteers from across their target community are given opportunities to participate in the service.
- l) In seeking to ensure that members of the target community contribute to the operation and management of the service, stations should consider their training opportunities and how those feed into the day-to-day operation of the service. This does not just mean training on-

air presenters, but also providing training for off-air roles, which could include book-keeping, advertising sales, volunteer co-ordination, fundraising, training leaders or a variety of other roles. Stations should also ensure that members of the target community can contribute to how a station is managed – this could be through holding elections for leadership roles, establishing, and making use of, advisory groups comprised of members from within the target community or having mechanisms by which volunteers can feed into management discussions, among other things.

- m) Stations should ensure they are accountable to their target community, both in the on-air service they deliver and in their off-air activities. Licensees could consider publicising their Key Commitments, holding open AGMs with publicly available minutes, providing regular opportunities for feedback on the content they broadcast, or publishing reports of their activities for the community to access, among other things.
- n) As with on-air performance, we consider that community radio stations are, on the whole, best placed to determine how to arrange their off-air social gain provision in a way which best reflects the needs of their target community. However, we expect stations to be able to explain in detail how they are meeting this requirement if asked, as well as be able to provide to Ofcom relevant evidence/examples to demonstrate their commitment to social gain.

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