Joint Submission by Irish Community Media to the Joint Oireachtas Committee.

Head 10. Functions.

Explanatory note: We make additional observations on the following clauses under this heading.

(v) Promote and protect the interests of the public in relation to audio-visual, audio and online content;

Note: This can be effectively accomplished by tying in the following clause:

- (xiii) To promote public awareness, encourage research and conduct public information campaigns for the purpose of educating and providing information to the public in relation to:
 - (a) online safety;
 - (b) media literacy;

Note: Media literacy is going to become ever more important in an increasingly online world. Misinformation and disinformation seep out of too many unregulated platforms to influence other media and citizens. Community media have been promoting media literacy since the mid '90s. *The Commission should be statutorily mandated to work with those media sectors already showing experience and commitment to such public education.*

Note: this can be worked into clause:

(xiv) Promote educational initiatives and activities relating to online safety and advise, when requested, the Minister or any other Minister of the Government, Departments of State or any public body whose activities are concerned with matters relating to any of the purposes of this Act, and any educational or training institution;

Note: In many instances, community media have built up strong working relationships with educational and training institutions. *The Commission should be statutorily mandated to enable the further development of such initiatives.*

Note: As a sector that consciously stands apart from other sectors in order to maintain a clear, focussed approach to ownership and purpose. We believe that the Commission should be statutorily obliged to promote both diversity of media ownership and plurality of content. Thus the following clause should be further elaborated.

(xvii) Promote diversity in control of media businesses operating in the State;

Note: The Commission should be statutorily obligated, in light of these inevitable, market driven media mergers, to ensure the sustainability and development of the community media sector which, as a system of communally owned media, and only licensed as such, are impervious to such market takeovers. This is a secure way for the State to protect media plurality and content, and should be legislated for.

(xviii) Provide a regulatory environment that will sustain independent and impartial journalism;

Note: The word journalism applies to an occupation, it also describes the process of gathering and dissemination information, it may not always be a paid occupation, or the most effective. In an online world of 'everybody is a journalist,' each society has problems with what to believe. How to legislate for this?

Research has shown that in an ever more globalised world, people tend most, to trust local information from local informants, how can the legislators factor in such intelligence? The Commission should be statutorily obliged to enable each region of our country to establish 'Community Media Hubs' of community dialogue and engagement, of media training and best

practice exchange. These audio/visual media, owned and controlled by local citizens, will provide trustworthy, local awareness to counter misinformation while encouraging regional development.

There is also a second point in relation to this.

Note: The Commission should be statutorily obligated to foster forms of journalism that are community orientated and media literate. They should be instructed to ensure that the initial batch of 'Journalism Bursaries' are equally divided between community and local media. such a pilot model can provide future Oireachtas committees with valuable data on how to fund appropriate forms of journalism in a media illiterate age.

Note: This is an important follow-on process. This legislation is taking all of us into uncharted territory. The Commission needs to be statutorily obligated to establish a standing 'Media Advisory Group' to assist them in the following work:

- (xx) The Commission shall have a statutory role in relation to the following:
 - (a) reviewing existing online safety and media service related legislation and proposals for such legislation
 - (b) Undertaking a strategic review or reviews of the regulated sectors covering one or more of the following areas:
 - (I) sectoral funding
 - (II) technological and societal change.

Note: As a media sector that has led the way in podcasting (the first podcasting radio station in Ireland was community one) and we lead in diversity of content, including the new Irish voices, the marginalised and overlooked, but always in a manner of societal dialogue. Community media are well placed to assist the Commission in parsing societal change. We ask that the Joint Oireachtais Committee ensure that community media remain at the centre of this Commission's attention in terms of sectoral funding and in matter's of technological change.

Additionally, Head 19: Membership of the Commission

5. An appointment of a Member shall not be made unless the person who the [Minister/Government] proposes to appoint possesses, in the opinion of the [Minister/Government], sufficient expertise in, or experience of, one or more of the following areas, namely, [specify areas]

Note: Community media should be listed as a specified area. Previous Boards of the BAI and its processors have sometimes had no member with any experience or knowledge of the community broadcasting sectors (they appear to have been appointed based on a confusion with local broadcasting, and the imprecise use of the term 'community'). The Commission should ensure that the areas specified in terms of expertise and experience include community media in the legal meaning of the term. (as per 2009 Broadcasting Act.)

Thank You.

Craol: Irish Community Radio/CTA, Community Television Association.

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