

COMMUNITY BROADCASTING IN THE MALDIVES

Final Report on Preliminary Research and Consultancy for Community Broadcasting

Murray Green

9 January 2013

The Maldives Broadcasting Commission, supported by the United Nations Development Program, engaged Murray Green as a consultant to work in the Maldives from 2-15 December 2012 on exploring the feasibility of introducing community broadcasting and the regulatory framework that might support it.

Terms of Reference

The consultancy had the following brief:

1. Identify the feasibility of implementing this service in the Maldives
2. Identify the areas/atolls that are best to introduce this service (considering cultural practices and livelihood for example)
3. Identify the issues which may face communities in the introduction of community broadcasting
4. The best way in which community broadcasting can be used in the community
5. Consultancy to the Maldives Broadcasting Commission on the necessary steps that have to take place before implementing the service
6. Consultancy to the Maldives Broadcasting Commission on the necessary steps that have to take place while formulating the regulation

There was some focus in weighting these objectives on risk factors in introducing community broadcasting and the ways in which these risks could be mitigated.

The Approach

A draft program was prepared (Appendix 1) to incorporate the following areas of inquiry and engagement:

- (a) Discussion with Commission executive staff on contextual issues in the Maldives in politics, society and the media and approaches to regulation;

- (b) Meeting with the President of the Commission and other Commissioners on their strategy in relation to community broadcasting;
- (c) Travelling to atolls and islands that have expressed interest in community broadcasting
- (d) Anticipating the introduction of community broadcasting outside Male' in the first instance
- (e) Meeting with some Island Councils to explain community broadcasting
- (f) Meeting with some NGOs and interest groups to assess readiness to use the potential of community broadcasting
- (g) While community broadcasting includes community television as well as community radio, the focus in the first instance is on the introduction of community radio

This approach is based on the assumption that Male' is presently served by radio and television services (commercial and public service) originating in the capital and that other islands and atolls are devoid of originating broadcasting services. Further, community radio is a more immediately accessible and affordable entry into community broadcasting rather than also attempting to also introduce community television at this point of time.

The individuals and interest groups conferred with can be found in Appendix 1.

The structure of this report will address each of the Terms of Reference and provide a sequence of recommendations.

The staff of the UNDP and the Commission were particularly helpful and encouraging during this consultancy. I wish to express particular appreciation to Shaliny Jafaur, Program Analyst in the Democratic Governance Unit at the UNDP Maldives, and Aishath Shaaheen, Director Planning and Projects at the Maldives Broadcasting Commission. Shaliny shared her substantial knowledge of civil society in the Maldives and Shaaheen was consistently encouraging and a source of much helpful contextual background and contributed much to the strategic direction of this project.

The President of the Maldives Broadcasting Commission, Mohamed Shahyb, and the Acting Secretary General, Mohamed Nasih, showed great interest in this project and contributed much insight.

This consultancy would not have been possible if I did not have the most committed assistance of Ahmed Arshad, International Officer at the Commission. Arshad arranged meetings, translated, negotiated transport, and was a critical source of background information and collaboration. The experience of Arshad's previous work in the office of the Maldives President provided valuable insight into how the nation's democracy works.

A Draft Report was submitted to the Commission on 16 December 2012 and comments were received back from the Commission on 27 December 2012. A Final Report was prepared on 30 December 2012. Following further comments

from the Commission, a revised edition of the Final Report was released on 9 January 2013.

Executive Summary of Recommendations (R)

- R1** That the tests for viability of community radio, in the criteria for the award of a licence, include: indicators of expression of interest; indicators of ongoing commitment; the community diversity represented by the applicant; the capacity to raise adequate funds as well as to govern and program schedule a station; and the demonstrated community value of the proposed station.
- R2** The Commission should prepare a plan, area by area, for the roll-out of community radio and this plan should cover the whole of the Maldives
- R3** The Roll-Out Plan should specify an area (e.g. Southern Islands and Atolls) for licences to be offered but the exact location for a community radio station should be interest driven
- R4** The first area to be identified for licence applications should be outside Male' because the capital is served by a number of Male' originating radio services
- R5** In the award of licences some consideration should be given to expression of local dialects
- R6** The licence for a community station be only granted to a separate not for profit legal entity created for the sole purpose of community broadcasting in a particular location.
- R7** This legal entity shall be called a Community Broadcasting Association with the service area or location included in its name.
- R8** The Board of a Community Broadcasting Association should be elected from a diverse cross section of its service community.
- R9** A condition of licence to a Community Broadcasting Association should be that at least some of its directors should be elected from community sectors such as education, health and welfare, sport and island or atoll services.
- R10** A Community Broadcasting Association should have a defined membership with a low barrier to entry. The membership elect the board of a Community Broadcasting Association.

R11 Funding of a community broadcaster by way of donation or grant from a single source be limited to 33% of a station's revenue. In addition, a community station should be permitted to have limited paid advertising.

R12 The Commission facilitate the creation of an independent Community Broadcasting Foundation for advocacy of community broadcasting and support of training and development

R13 The first community radio licence applications should be called by December 2013 with the first stations on air in early 2014

What is Community Broadcasting and Where Does it Fit in the Maldives Media Environment?

Community broadcasting was expanded some 40 years ago in Latin America and Africa and later spread including to Canada, Australia, the United Kingdom, South and East Asia.¹

Three distinguishing features of community broadcasting separate this sector from commercial and public sector broadcasting.

Community broadcasting is:

1. **Local:** one licence is issued to one locality. Unlike commercial and public service broadcasting, that is often networked and has a national orientation, community broadcasting focuses on the interests of a local community.
2. **Content produced by the local community.** Community broadcasters are principally volunteers who present programs that reflect their local community. The ambience of a community station is that it sounds like the street or village rather the sound of broadcasts on commercial and public service stations.
3. **Not for profit.** Any surplus funds must be reinvested in the community broadcasting station and not to distributed to individuals

¹ See Kalinga Seneviratne (ed) *Peoples' Voices, Peoples Empowerment: Community Radio in Asia and Beyond* (Asia Media Information and Communication Centre, Singapore, 2012)

or corporate entities. This does not prevent community broadcasters from paying people for their services if funds allow.

Community Radio in the Maldives, licensed in individual islands or atolls, would be in contrast to the Male' originated nationally broadcast radio services of commercial radio and the Maldives Broadcasting Corporation.

The Broadcasting Act (16/2010) empowers the Maldives Broadcasting Commission to introduce community broadcasting and establish regulations for the sector.

Responding to the Terms of Reference (TOR)

TOR 1. Identify the feasibility of implementing the service (community radio) in the Maldives

Testing the feasibility of community radio in the Maldives includes consideration of where interest has been expressed; evidence of ongoing commitment to run the service and capacity to deliver the service. There are also considerations of whether the potential licensee represents the diversity of the community in its governing board and in the proposed schedule for the station. There are further considerations as to whether the proposed service will add value to a community and what impact the proposed service might have on existing radio services.

(a) Feasibility as indicated by interest expressed

In considering the approach to licensing community radio it is proposed that the Commission should respond to areas where interest has been expressed, rather than initiate a single national call for licence applications. Expression of interest is the first step in assessing whether licence applications should be called.

(b) Feasibility as indicated by ongoing commitment

It is one thing to express interest but another matter to act on that interest and demonstrate ongoing commitment. Indicators of ongoing commitment might include forming an association for the purpose of seeking a licence, fund raising to meet initial capital costs and obtaining endorsements from a range of local community leaders.

(c) Feasibility as indicated by demonstrated capacity

A potential licensee needs to demonstrate the ability to raise the start up and ongoing finance (at least, it is suggested, for one year). Where transmission and studio facilities already exist and agreement for their use can be achieved with the Maldives Broadcasting Corporation (in the case of the seven decommissioned Community Media Centres around the islands), the funds for start up will be very

modest. Start Up and Ongoing costs are discussed later in this report. A business plan that demonstrates viability in both these areas should be considered as a condition for the grant of a licence.

Demonstrated capacity also includes the ability to form an association with the sole purpose of community broadcasting and attract members to that association. Membership, it is suggested, should be a requirement for all roles associated with the community station.

The ability to train and manage volunteers is also an indicator of capacity. While external assistance may be sought, training and development is a principal ongoing priority of a community station.

Being able to construct a broadcast schedule indicating the programming of the station is also an indicator of capacity.

(d) Diversity as an indicator of feasibility

It is critical that a community station can demonstrate the widest possible diversity reflected in its licence area in the community station's governance, content and association members.

One of the challenges of effective community broadcasting is that a station is not captive to assertive interest groups or individuals, including political interest groups. Further, a station should not be run by an elite that are the only ones who have access to presenting content. Therefore, a potential licensee would need to demonstrate that it has the capacity to encourage a wide range of participation in its governance and its content.

(e) Feasibility as indicated by demonstrated community value

A community broadcasting licence should add significant value to the community it seeks to serve. A community broadcaster should be fully engaged in the life of an island or atoll and its proposed schedule should reflect that. Issues of community priority, such as addressing concern over abuse of women and children as well as drug abuse,² should be represented in a community station's content, if these matters are relevant.

A schedule should not be built around just the interests of presenters but rather reflect community interests, aspirations and concerns.

(f) Feasibility as indicated by not duplicating existing radio services

A community station is essentially local, committed to community participation in its operations and not for profit. A community station should not attempt to mimic other radio services, for example taking on a commercial flavour, style

² These issues were consistently raised in some field visits for this report.

and interest that may affect the viability of that sector in a market. This is not to be confused with justifiable competition for audience.

Recommendation (R)

R1 **That the tests for viability of community radio, in the criteria for the award of a licence, include: indicators of expression of interest; indicators of ongoing commitment; the community diversity represented by the applicant; the capacity to raise adequate funds as well as to govern and program schedule a station; and the demonstrated community value of the proposed station.**

TOR 2. Identify the areas/atolls that are best to introduce this service

In preparation for this report, field visits were undertaken to selected islands and atolls. The location of these field visits followed the principle that the regulator should respond in its planning of community radio where there have been expressions of interest. It is acknowledged, however, that the current awareness of the opportunities for community radio is very limited and the distinguishing features of community radio are not widely understood. This situation should change following a national awareness campaign by the Commission before licences are called for. The extent of field visits was further constrained by the time available for this preliminary research project.

Visits were undertaken to the islands of Addu and Fuvahmulah and the atoll of Vaavu (see details in Appendix 1). Briefings were also held in Male'. Each of these locations has demonstrated capacity to apply for a community radio licence. For example, community broadcasting is included in the strategic plans of the Councils of Addu and Fuvahmulah and both these locations have decommissioned Community Media Centres that may be able to be re-established as community radio stations. Fuvahmula, in addition, has some 14 community members who have been trained in radio broadcasting and resident engineering expertise to support such a station. There was widespread enthusiasm and support for the prospect for a community licence not only from the Fuvahmulah Council but also from school principals, health workers and NGOs, women's committees and local musicians. In Male' the Maldives National University has developed plans for a FM station.

It is the consultant's view that there is strong and viable interest in community radio in Fuvahmulah and Addu and community radio licence applications should first be called for in this southern area as the first phase of a publicly announced

national plan, area by area, for the roll-out of community radio. The exact location of a community station should be interest driven.

Once one or two community stations are established then it is most likely that other islands or atolls would also express interest. In its full roll-out phase, it is conceivable that there could be some 40 or more community radio stations in the Maldives. Even communities of less than 1000 may be able to sustain a community radio station with the most basic of infrastructure.

While it is recommended that community radio first be called outside Male' this does not exclude community radio services in Male'. It just means that the first community radio services in the Maldives would begin outside the capital.

Recommendations

- R2 The Commission should prepare a plan, area by area, for the roll-out of community radio and this plan should cover the whole of the Maldives**
- R3 The Roll-Out Plan should specify an area (e.g. Southern Islands and Atolls) for licences to be offered but the exact location for a community radio station should be interest driven**
- R4 The first area to be identified for licence applications should be outside Male' because the capital is served by a number of Male' originating radio services**
- R5 In the award of licences some consideration should be given to expression of local dialects**

TOR 3 Identify the issues which may face communities in the introduction of community broadcasting

Establishing a community radio station requires significant effort in creating and sustaining interest; forming a local association for the singular purpose of holding a community radio licence; achieving diversity in the governance and content of the station; fundraising; training and development; agreeing on a content schedule; having mechanisms for dispute resolution and developing station protocols, including codes and broadcaster agreements.

(a) Creating and sustaining interest

Once there is an explanation of the potential of community radio there is often enthusiastic interest. The challenge is to grow and sustain that interest in the significant journey (think possibly one or more years rather than months) to the point of receiving a licence. In a community this will involve building a coalition of individuals and organisations who are committed to applying for a community radio licence. This building of interest will involve imagining the sort of content from the community that would feature on air. Facilitated workshops may be the means by which this outcome is fostered.

(b) Forming a local community broadcasting association as the licence applicant

It is recommended that a licence for a community station be only granted to a properly constituted legal entity created for the sole purpose of community broadcasting in a particular locality. In field visits there was interest from some Councils and NGOs in being the licence holder. It is argued that this is not appropriate as the purpose of community broadcasting may get lost in the wider and possibly conflicting agendas of a more broadly based entity. If a Council held a community licence, for example, it may be difficult for a contributor to the community station to be critical of Council services. If a NGO, with a wider purpose than broadcasting, held the licence they may be tempted to use community broadcasting to disproportionately promote their own wider objectives. This is not, however, to suggest that a representative of a Council or NGO would not be an appropriate member of a diversely constituted board of a local community broadcasting association.

(c) Achieving diversity in the governance and content of the community station

A threat to the ability of a station to reflect the diversity of the community it serves is in forceful individuals or groups dominating the management and broadcast content. Statutory and self-regulatory mechanisms should make it difficult for this to happen. A preferred option is to specify interest sectors from which some members of the board of a community broadcast association should be elected. For example it could be specified as a licence condition that a board of a community broadcast association should have one director each from education, health and welfare, sport and island or atoll administration. Remaining directors could be elected from any part of the community. If there are legal hurdles with this recommendation then the Commission has the power to outline its preferences in a Guidance Note.

The concept of membership of a local community broadcasting association is critical to the efficacy of the station's governance. In order to participate in the life of a community station, either on air or by way of support, participants need to be a member of the local community broadcasting association. Barriers

to membership should be low (for example, modest fees) and membership could be offered both to individuals and organisations. The strength of membership of the association is an indicator of community interest and support. The membership should elect the directors of the association's board and may elect the President of the Board directly or give this discretion to the Board itself.

Diversity needs to be also demonstrated in the content to of the station's broadcast schedule. A Community Broadcasting Code should require of stations to broadcast a range of views on matters of controversy or contention. For example, it would be a breach of the Code for the views of only one side of a debate to be heard on the station. A station's program schedule should reflect the diversity of interests in the community it serves.

In relation to political party content there is expressed concern that community stations could be dominated by assertive political voices. One response is to advocate that no political parties should have access to a community station. However, this approach may have some constitutional difficulties as the Maldives Constitution guarantees freedom of expression (Section 27). Another approach is that, if political content is broadcast, is to require that a diverse range of political views be presented on a community station and political parties be offered equitable access. If this approach is adopted, it is suggested a particular code for political broadcasting, including election advertising and reporting, be prepared for community broadcasters.

(d) Fund raising to get established and to keep going

There was the false expectation in some field visits that the government or an international agency would fund a community radio station. For ongoing viability, most of the funds for a community station should come from that community itself. There are two major areas of expenditure for a community station: raising funds to get established and raising funds to keep going.

(i) *Raising funds to get established*

The most basic community station can be established for US\$5000. This is the Asia Pacific Broadcasting Union's (ABU) Radio Station in a Suitcase. However the signal is low power and would only cover part of an island or a very small island. A more realistic start up budget in the range of the bare essentials to the more satisfactory from US \$10,000 to US\$40,000.³

A major asset outside Male' are the seven Community Media Centres owned by the Maldives Broadcasting Corporation and established over a decade ago with the purpose of community based broadcasting that also contributed to the national Voice of Maldives radio network. These Centres were decommissioned some two years ago and include facilities in Addu and Favahmulah, which with some remediation and the agreement of the Maldives Broadcasting Corporation

³ See *UNESCO Handbook on Community Radio* 2001.

could be the infrastructure for a local community radio station. The cost of remediation would probably be in the low thousands \$US.

A regulatory issue for the Commission is whether to intervene in limiting funds either for establishing or maintaining a community station from one source. The issue is whether a community radio licence can be 'bought' by substantial donors for private or partisan purposes. In one field visit it was indicated that an off-shore donor had offered to meet the total costs of establishing what would be a community broadcasting station. This appears most undesirable as it could open the station to being pressured to meet inappropriate or disproportionate obligations. There is a case for considering limiting the funding of a community station to some 33% from any one external source in order to encourage diversity of support.

(ii) Raising funds to keep going

The principal budget item in a community station that has no staffing costs (all volunteer) is the cost of power. On one island the cost of power for an FM transmitter and the associated air conditioning was MVR 8,000 per month. In addition other utility costs have to be considered, particularly telephone, data and internet connections and services. Rent of premises may not be a consideration if space is provided. Annual running costs for a modestly established community station could be US\$15-20,000 per year. Smaller basic established community stations could be less.

(iii) Sources of funds

It is recommended that a community radio station be permitted to take paid on-air advertising for a limited number of minutes per hour (5 minutes may be a consideration but the extent of this limit needs further consideration). If a commercial station originates in the same market in the future then that provision may need to be reconsidered.

Interest groups or NGOs who broadcast their own program on the station, and whose content does not amount to advertising, may pay an access fee per hour.

Membership fees are a significant source of revenue as is on air fund raising through Radio-Thons where funds are donated on air over a confined period of time.

Particular on-air campaigns may attract external funding when there is alignment with issues, such as concern over the environment and climate change as well as drug abuse and the empowerment of women.

(e) Training and Development

The one single ongoing most critical task for a community broadcaster is training and development of volunteers both for both on-air and off-air roles. The first area of training focus should be on the purpose of community broadcasting and the values and editorial code of practice of the sector. The values of community broadcasting include contributing to community cohesion and empowerment and enhancing democratic practice in the nation. Community broadcastings provides an opportunity for unheard voices and perspectives to be shared with a wider audience. A principal editorial value is respecting the opinions of others with whom there might be disagreement. A community broadcaster is where you expect to find civil discussion and debate about issues of community importance. Presenters on community radio need to be trained to facilitate discussion that includes disagreement, sometimes passionate advocacy and the exploration of a range of views.

The boards of community radio associations should be assisted in dispute resolution, strategic planning, team building and the support and management of volunteers.

Contributors to community radio should be supported in acquiring the skills for effective communication on air.

It is proposed that the Commission facilitate the formation of an independent foundation with the purpose of advocating the role of community broadcasting and providing training and support for innovation. A Community Broadcasting Foundation (CBF) should be formed as a separate legal entity that can attract funds to support the development of community broadcasting. The CBF should have a small board that includes people of standing who are able to advocate for the sector.

It is probably beyond the Commission's role and capacity to fulfil these tasks of support and advocacy.

The Commission may have to establish the CBF in the first instance, appoint its board after advertising for expressions of interest, and then once the community broadcasting sector is established (for example, within five years) call for the election or re-election of CBF board directors by community broadcasting licensees.

The CBF is not a regulatory body but an advocate for the community broadcasting sector with a strong focus on fundraising for training and development. Self-regulation or co-regulation of the community broadcasting sector should be the role of a community broadcasting industry group (e.g. Maldives Community Broadcasting Association) which could reasonably be formed within the first years of licence grants for community stations.

(f) Agreeing on a content schedule for the community station

An ongoing responsibility of the board of a community broadcasting station is to ensure the program schedule reflects the diversity in the community.

There may be disputes amongst members and contributors as to what content goes into more accessible listening times. The Board will have to resolve any disagreement and take into account any dissent.

(g) Developing mechanisms for dispute resolution and a clearly understood approach to responding to listener complaints.

Community broadcasters can be often passionate about their content and disagreements can occur within or between programs and people. Leaders of community stations need to be equipped to resolve disputes. Mechanisms for dispute resolution should be fair and clearly understandable.

Complaint handling is one of the most important and useful tasks a broadcaster engages in. Complaints means someone is listening and feels committed enough to respond to what has been broadcast. Complaints need to be handled in a timely, systematic and considered way. It is preferable that complaints in the first instance are resolved by the community broadcaster rather than immediately going to the regulator. If errors have been made these need to be quickly corrected on air.

(h) Developing community station protocols and broadcaster agreements

Because of the number of people likely to be involved in a community station it is important to develop guidelines as to how the station should operate. These guidelines might include explaining the rights and responsibilities of volunteers as well as broadcaster agreements for individuals and organisations that broadcast on the station. For organisations the agreement might include indemnifying the station from any legal action in response to material broadcast in an organisation's program and a commitment to observe the Community Broadcasters Code of Practice and take reasonable direction from station leaders and board.

Recommendations

R6 The licence for a community station be only granted to a separate not for profit legal entity created for the sole purpose of community broadcasting in a particular location.

R7 This legal entity be called a Community Broadcasting Association with the service area or location included in its name.

R8 The Board of a Community Broadcasting Association should be elected from a diverse cross section of its service community.

R9 A condition of licence to a Community Broadcasting Association should be that at least some of its directors should be elected from community sectors such as education, health and welfare, sport and island or atoll services.

R10 A Community Broadcasting Association should have a defined membership with a low barrier to entry. The membership elect the board of a Community Broadcasting Association.

R11 Funding of a community broadcaster by way of donation or grant from a single source be limited to 33% of a station's revenue. A community station should be permitted to have limited paid advertising.

R12 That the Commission facilitate the creation of an independent Community Broadcasting Foundation for advocacy of community broadcasting and support of training and development

TOR 4 The best way in which community broadcasting can be used in the community

Community radio is a means by which the sounds and stories of a community can be shared. There is a strong sense of local voice. This may include access to the airwaves by schools, sports clubs, health and welfare NGOs, religious organisations, and community services such as police, council and medical centre. It may also give access to women's groups, musicians, environmental groups and industry groups, such as fishing and tourism, together with groups supporting the development of agriculture. There will also be opportunities for individuals to host segments of community interest.

During field visits it was clear that local Councils had thought about the potential of community radio. Preparing for extreme weather conditions was the concern of one Council while another had an island public address system in place. But this reached only part of the island and the Council saw community radio as a most valuable means of communicating with the whole island on matters such as changes in ferry timetables.

TOR 5 Necessary Steps for the Commission to implement community broadcasting

The Commission has a significant planning task ahead in preparing for the introduction of community radio. First, licence conditions have to be drafted then a national staged area-by-area Roll-Out Plan has to be devised. Areas for these services need to be identified but the exact location of a community radio service should be applicant driven. Frequencies need allocating for community radio. Guidance Notes for applicants need to be prepared as to what is required to obtain a community radio licence and how long the approval process is likely to take.

Understanding about what is community radio and how it differs from commercial and public service media appears to be presently at a very low level. An extensive communication plan, implemented over several months before the calling for applications for the first licences, and to first foster awareness of the distinctive role of community radio is an early essential task.

These initiatives will be a significant call on the Commission's resources. Assuming staffing may not increase for the introduction of community radio, the Commission may need some external assistance. The preparation and execution of the Communication Plan, for example, may be outsourced to a communications company.

Communication should not only be engaged at the level of communities in islands and atolls. There needs to be some effort put into briefing parliamentarians about the purpose of community broadcasting.

(a) Drafting conditions for grant of a community broadcasting licence

This work will set the foundations of the sector. Attention needs to include the form of the licence entity, and the diversity of its membership. Matters of sustainability, proposed program schedule and evidence of community support are other considerations.

(b) Preparing a Roll-Out Plan

A Roll-Out Plan should be prepared for the whole nation, providing an indicative timetable region by region as to when applications for licences will be called for. The actual location of a community station will be determined by where the applications come from.

The Roll-Out Plan will be the focus of the Commission's announcement about the introduction of community radio in the Maldives.

(c) Allocate frequencies

This needs to be done nationally but the Commission may choose to announce them region by region as applications are called for in a staged way.

(d) Prepare Guidance Notes for applicants

There needs to be information of what an applicant needs to do to apply for a licence. Guidance Notes are not regulatory imperatives but rather background information that assists applicants prepare for a community station.

Guidance Notes could also be usefully provided on the equipment and funds needed for a community station, how to organise volunteers, the areas of training first required, and how to devise a broadcast schedule.

(e) Prepare a public communications and awareness plan on the introduction of community radio

The success of community broadcasting will depend on public support for its purposes and its ability to enhance a community. These attractive attributes need to be communicated. The timetable for the introduction of community radio in the Maldives is an essential part of this communication and awareness plan.

(f) Introduce the first community stations in the Maldives sooner than later

There is significant appetite in islands and atolls visited for this new service. It would not be an unreasonable expectation that the first licences may be called for by December 2013 with the first stations on air early in 2014. To delay the introduction of community radio further out than this indicative timetable may risk community support for this sector. It is hard to sustain community interest if the timetable for licences is not reasonably imminent.

(g) Establish internal capacity within the Commission

A project officer should be designated and skilled up to be the first point of inquiry once community radio is announced and licences are called for. Community broadcasting has a large number of stakeholders and the Commission needs to anticipate a substantial flow of inquiries once other islands and atolls realise the potential of this service. The project officer could also work on establishing the Community Broadcasting Foundation, which over time will become the clearing house for information on community broadcasting.

*Recommendation***R13 The first community radio licence applications should be called by December 2013 with the first stations on air in early 2014****TOR 6 Necessary Steps for the Commission in formulating regulations for community broadcasting**

When thinking about the regulation of community broadcasting, and if the number of community stations in the Maldives grows rapidly, the only viable way in which the sector can be regulated is through a strong element of self-regulation, with standards being fostered by the Community Broadcasting Foundation and sector performance and development encouraged by the formation of a national community broadcasting industry group whose task would be to liaise with the Commission over regulatory matters. If it is not self-regulation then it is certainly co-regulation.

The Commission's regulatory steps in introducing community broadcasting include first establishing the criteria for the grant of a licence, developing a Code of Practice, consider offering temporary permits to aspirant broadcasters to go to air for limited periods in preparation for application for an ongoing licence and establishing fund raising guidelines for community broadcasters, in particular considering access to limited paid advertising.

The Commission also needs to anticipate some of the risks associated with introducing community radio in the Maldives and also anticipate what measures may mitigate against those risks.

(a) Establishing criteria for the grant of a licence

This is arguably the most important work in planning for the introduction of community radio as it will set the framework for the viability, support for and growth of the sector. As already highlighted in this report, matters of diversity in the governance of a station and diversity in its content are paramount considerations in establishing the sector. A further consideration is that a community radio licence holder should hold only one licence in one location.

(b) Developing a Code of Practice for Community Broadcasting

The Code of Practice should enunciate the values of community broadcasting and the editorial practice of community broadcasting, particularly dealing with controversy and covering matters of contention. While it is not wise to uncritically import regulatory solutions from other jurisdictions, they can

provide stimulus for thought about what is appropriate in the Maldives. Appendix 2 has the Code of Practice of the Community Broadcasting Association of Australia that covers a membership of over 300 stations.

(c) Explore the grant of temporary permits for community radio

Some aspirant community broadcasting associations may not be ready to immediately apply for a longer term licence and would benefit from the experience of a temporary permit to broadcast. This can build members' enthusiasm and gather community support as well as demonstrate the potential that is yet to come with a licence grant. However, in most cases it may be better to go straight to ongoing licence grants in order to encourage a focus on sustainability.

(d) Streaming to enhance the community radio service

In order that the Commission can hear stations in locations outside Male', consideration could be given to suggest stations stream their output on the internet. This would have an additional advantage allowing people originally from that island or atoll being able to keep up with local news by listening to the community station online. The cost and present availability of internet services on islands and atolls, however, may make this suggestion difficult to implement across the nation. The option to stream may be considered to be a voluntary offering on the part of a licensee, where this is possible.

(e) Establishing reporting requirements for community radio

It may be appropriate for community stations to have similar annual reporting requirements as commercial licensees.

Mitigating against risks in implementing community radio

There are some risks associated with community radio as a sector. First, some stations may fail because of declining interest and funds. Second, some stations may be pressured by dominant forces and therefore not represent community diversity. Third, some stations might have unresolved disputes and find it a challenge to moderate inflammatory content.

Failure can be mitigated by ensuring viability before a licence is granted. A first year business plan should be a requirement in a licence application. Dominant forces can be resisted by diverse governance arrangements in the board of the community broadcasting association. Unresolved disputes can be addressed through advice from the Community Broadcasting Foundation or a national community broadcasting association.

Failure is a risk in the community broadcasting sector but, on balance, the potential strengths of introducing community radio in the Maldives significantly outweighs any difficulty by an individual licensee.

Conclusion

The introduction of community radio will add much to the range and quality of the media in the Maldives. Foremost, it will empower local communities in islands and atolls that have not had the opportunity to tell their stories and share their aspirations. Community radio will not only enhance the media in the Maldives but has the potential to enhance the nation in enabling citizens to be communicators.

Murray Green
9 January 2013

APPENDIX 1

Draft Program Version 5 [Tuesday 11 Dec 12 1500]

Consultancy on Community Broadcasting in the Maldives

United Nations Development Program (UNDP) and Maldives Broadcasting Commission (MBC)

2 – 15 December 2012

Murray Green (MG)

Date	Meeting	Purpose
<i>December 2012</i>		
Sunday 2	2210 Arrive SQ 452	
Monday 3	0900 Meet at MBC	Initial Briefing with Aishath Shaaheen [AS] Director Policy and Planning, MBC
	1100 Meet at UNDP	Initial Briefing with Shaliny Jaufar [SJ], Programme Analyst, Democratic Governance Unit, UNDP
	1300	The media regulatory context: discussion with (AS)
	1430	Work with Ahmed Arshad [AA], MBC Liaison for Consultancy, on contacts and program
Tuesday 4	0900	Legal issues in media regulation: discussion with Director Human Resources and Administration, Ahmed Rashid [AR]
	1100	Mohamed Inaz, Environment Unit, UNDP
	1300	Badru Naseer, Chief Executive Officer, Institute of Governance and Development and former President MBCommission
Wednesday 5	0615 Leave for Addu	Meeting with potential interest Groups: Island TV

		<p>Community Media Centre (not functioning) NGO Noorul Islam MCU Football Club Mohamed Saudhy Hassan, Director of Secretariat of Addu City Council Three Principals from Addu Secondary Schools Mohamed Naeem, Chair, Freedom (NGO working on drug abuse)</p>
Thursday 6	Addu	<p>Trip not possible to Fuvahmulah because of cancelled ferry services</p> <p>Worked on contacts for coming week</p> <p>Met citizens at Power Park Café (policeman, IT adviser, engineer, businessman) who all expressed interest in community broadcasting</p>
Friday 7	0840 Leave Addu	Travel back to Male' arriv 1300
Saturday 8	Male'	Preparation of reporting structure
Sunday 9	0800 1000 1220	<p>Confirm plans for week</p> <p>Leave for airport</p> <p>Fly to Fuvahmulah</p> <p>Open Hand NGO Visit Community Media Centre (not in use)</p>
Monday 10	Fuvahmulah	<p>Council and interest groups: Women's Council Councillor Council Director Policy and Strategy NGO meeting VOM Engineer Women's Committee Group of Musicians School Principals</p>

Tuesday 11	0940 Leave for Male'	
	1200	Male' interest groups: Maldives National University Commercial Radio Ministry of Home Affairs Ministry of Education Male Sports Council Media Council
Wed 12	0900	Human Rights Commission
	1000	Dean of Arts, Maldives National University
	1100	Communication Authority of Maldives
	1300	Mohammed Shafeeg Mahmood, Managing Director, Maldives Broadcasting Corporation
	1430	MG presentation on findings and recommendations: Mohamed Nasih, Acting Secretary General, AS, SJ,
	2000	Commissioners' Briefing
Thursday 13	Male'	Male' interest groups (Transparency International), Work on Draft Report
Friday 14	Vaanu Atoll	Depart early morning and return early evening (speedboat) Council and interest groups and islands
Saturday 15	MG depart 1450 SQ 461	Submit Draft Report by 16 December
Wednesday 19	Submission of Final Report	

APPENDIX 2

Community Broadcasting Association of Australia Code of Practice

http://www.acma.gov.au/webwr/_assets/main/lib410018/community_radio_broadcasting-code_of_practice_2008.pdf

APPENDIX 3

Background of Consultant

Dr Murray Green is a media development and legal policy researcher and consultant, with a particular interest in the Pacific and Asia.

Murray was Director International of the Australian Broadcasting Corporation from 2007 until March 2012 and was responsible for Australia Network television, Radio Australia and ABC International Development, a group working in the Asia Pacific on communication for development. Murray for six years was on the Council of the Asia Pacific Broadcasting Union (ABU) and in 2012 was recognised by the Commonwealth Broadcasting Association for service to public broadcasting.

Murray was formerly Director Corporate Strategy and Governance at the ABC. Prior to the ABC, Murray worked as Manager of Curtin University's community radio station. He also was President of the Public Broadcasting Association of Australia (now Community Broadcasting Association of Australia).

Murray has a doctorate in law from the University of Melbourne and is a graduate in Pacific and Asian history from Victoria University of Wellington and the Australian Film and Television School.

Murray is admitted to the Supreme Courts of the Australian Capital Territory and Victoria and as a barrister in the High Court of Australia. Murray is Honorary Professor in Public Diplomacy at the Soft Power Advocacy and Research Centre, Macquarie University, Sydney. He is also a Research Associate at the Communications Law Centre, University of Technology Sydney, where he teaches in the Master of Communications Law program.