

Key Commitments change request form

Community radio station name:	Winchester Radio
Licence number:	CR101262
Licensee (company name):	Winchester Radio
Contact name:	Nigel Dallard
Date of request:	04/09/2023

Details of requested change(s) to Key Commitments

A community radio operator may apply to Ofcom to have the station's Key Commitments amended.

Please complete the table overleaf by including your current Commitment in the left hand column and your proposed revised Commitment in the centre column. In the right hand column please give a brief explanation as to why you wish to make each change.

We also require you to complete a second table which asks you to explain your proposed changes with reference to the statutory framework.

If you do not provide an explanation for your proposed changes and a completed comparison table, Ofcom cannot consider a Key Commitments change.

Please complete this form and return it to: broadcast.licensing@ofcom.org.uk

Existing Commitment (as in your published Key Commitments) Please only include one commitment change per row, and add more rows as necessary into the table.	Proposed revised/new Key Commitment	Reason for proposed change
The service provides original output for a minimum of 70 hours per week.	The service provides original output for a minimum of 56 hours per week.	A number of factors are compounding to make this request necessary: 1) Our very small management team, which also has heavy on-air commitments, is having to plan a studio relocation within the hospital in which we are based, due to redevelopments by the NHS Trust. 2) Building on our successful application to the Community Radio Fund for funds to employ a Community Business Development Manager, we have recently been successful in our application to the Cranfield Trust for pro bono management consultancy to assist us in moving from an entirely-voluntary organisation, to one with a small core employed staff team. Over the coming months, our management team will need to devote significant time to this process, but it is already evident that, on an ongoing basis, we will need to dedicate more time to governance and strategy for the

		<p>organisation to become sustainable in the longer-term.</p> <p>3) Since the end of the pandemic, the work patterns of a number of our experienced volunteers have changed, meaning that they are unable to commit as much time to Winchester Radio. In the short-term, some of the additional broadcasting hours have been picked-up by the already-stretched management team, in addition to time spent training new volunteers.</p> <p>Something has to give in the short-term to enable the station to have a longer-term future, and the obvious solution is a modest reduction to our original hours per week.</p>

Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified¹) Ofcom must be satisfied that your proposed changes **meet at least one of the criteria referred to below**.

Please indicate which of these criteria you believe your proposed changes satisfy by deleting YES or NO as applicable and provide an explanation for why you consider a particular criterion is met in the relevant box. You should note that even if Ofcom is of the opinion that your explanation of your proposed changes meets one or more of these criteria, there may still be reasons why Ofcom is unable to consent to the change. When explaining your proposed changes, it is not enough to state that you believe one of the criteria is met. You must also demonstrate *why* you consider that at least one of these criteria is met.

In particular, if Ofcom is not satisfied that the changes would not substantially alter the character of the service (criterion (a) below), Ofcom cannot consent to the change without consulting on your proposals.² If this is the case, we will contact you to confirm that you are happy for us to consult on your proposed changes, and whether you wish to make any changes to your request in light of the need to make it public.

As part of our consideration of your request to make changes to your Key Commitments, we require applicants to provide an explanation for **at least one** of the criteria below.

(a) In your judgement would the proposed changes substantially alter the character of the service?	YES /NO (Please explain why below)
We are not intending to change the character of service in any way. We are currently averaging in excess of 80 hours of original output per week, and we would expect to average over 60 hours/week going forward. This request is to provide us with some headroom in case of particular problems, especially over the coming year.	
(b) Do you consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community?	YES /NO (Please explain why below)
We are not intending to narrow the range of programmes in any way. The reduction would come from our "mainstream" music-based hours, which make up the majority of our original output. Specialist and speech-based programming would not be affected in the short-term – with more time to invest in volunteer recruitment and training, we hope to grow our team and expand our speech-based programming.	
(c) Do you believe that there is evidence that, amongst persons comprising that community, there is a significant demand for, or significant support for, the changes that you have proposed?	YES/ NO (Please explain why below)

¹ As amended by sections 312 and 313 of the Communications Act 2003 and modified by the Community Radio Order 2004.

² Ofcom may approve a change under any of criteria (b), (c), (d) and (e) without consultation, or after a consultation of less than 28 days, if Ofcom considers that to hold a consultation at all, or for 28 days or more, would result in a delay that would be likely to prejudice the interests of the licensee. Ofcom may also remove for the purposes of consultation any confidential information submitted by the licensee.

<p>We have dedicated listeners, supporters and volunteers. None of these stakeholders would like to see Winchester Radio found to be in breach of our key commitments, because of the reputational damage that it would cause. People within our target community are appreciative of the huge amount of work that goes in to delivering our volunteer-led grassroots community radio service each and every week, and of how much our team care about the local community we serve.</p>	
<p>(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities?</p>	<p>YES/NO (Please explain why below)</p>
<p>On the contrary, reducing the committed number of original hours will allow us to recruit and train more volunteers. It is hoped that the new studio accommodation will also be better-suited to our needs. And, of course, once the management team has time to address the longer-term sustainability of the station, we will be able to continue to provide access to our facilities and training in the use of those facilities to members of the local community.</p>	
<p>(e) Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the service provided under your licence?</p>	<p>YES/NO (Please explain why below)</p>
<p>As stated above, we are not intending to change our speech-based programming in the short-term, and it is our longer-term aim to increase it. Thus, there will be no reduction in our facilitation of discussion/expression of opinion, which is primarily delivered via this programming. Longer-term we expect the investment of management team time into off-air activities will enhance our provision of training, and strengthen and broaden our already strong and wide connections with our target community, and increase the amount and ways in which that community can contribute to the operation and management of the station.</p>	

<p>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's published guidance on changes to Key Commitments (https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf).</p>
<p>Members of our management team are having to cope with some short-term pain at the moment, in anticipation of longer-term gain for the station. Next year is our 40th anniversary as a station, and our 5th as a licensed community radio station. This request is to provide us with some headroom in respect of our original hours commitment, in order to reduce pressure on our key management volunteers who are already overstretched with day-to-day work for the station, and to ensure that the station can survive for many more years. The requested change will help to minimise the potential short-term pain that we might have to endure.</p>

Data Protection

We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom's [General](#)

[Privacy Statement \(https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement\)](https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement) for further information about how Ofcom handles your personal information and your corresponding rights.
Amended May 2018

Ofcom notes on the request

The request was AGREED, because Ofcom was satisfied in relation to Section 106(1A)(a) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004, and further modified by the Community Radio (Amendment) Orders 2010 and 2015) i.e. that the changes would not substantially alter the character of the service, and for the policy reasons given below.

The Licensee is requesting a reduction in its original output requirement, from 70 hours a week to 56 hours per week. This would represent a total reduction of 20% to the original output requirement.

The Licensee says this reduction would facilitate the ongoing restructuring of the organisation from being purely staffed by volunteers, to having a small number of employed staff. Further, it would allow management to plan and execute the relocation of the studio within the premises they are based in. The reduction in hours would therefore ensure the long-term sustainability of the service.

The Licensee also notes that the reduction in hours would facilitate their social gain objectives by freeing management staff to train new volunteers for the service.

Despite the proposed 14-hour reduction we are satisfied that the service will continue to serve its target community of over-50s in Winchester and the surrounding area in the remaining 56 hours. Therefore, we do not consider these changes in conflict with the community radio 'characteristics of service' as set out in the legislation. We are approving this request under section 106(1A)(a) of the Broadcasting Act 1990 and for these policy reasons. October 2023