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## Secklow Sounds (Milton Keynes)

Request to change Key Commitments

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### **CONSULTATION:**

**Publication date:** Friday 11 October 2019

**Closing date for responses:** Friday 8 November 2019

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# 1. Overview

A community radio station's Key Commitments set out the type of service it is required to provide, and form a part of its licence. Key Commitments include: a description of the community to be served; a summary of the character of the service; a description of the programme service; social gain objectives; access and participation arrangements; and mechanisms to ensure accountability to the target community. When a request to change Key Commitments constitutes a significant departure from the character of service, the request is subject to consultation. This document outlines the request received from Secklow Sounds CIC (or "the Licensee"), and Ofcom's preliminary view on the request.

## **What we are proposing – in brief**

Ofcom is considering a Key Commitments change request submitted by Secklow Sounds CIC, which broadcasts to the urban area of Milton Keynes as 'Secklow Sounds'. The station's target community is "people in Milton Keynes, and particularly the disadvantaged, and those from diverse backgrounds."

The Licensee wishes to make the following changes:

- To reduce the amount of original output from 100 hours per week to 40 hours per week, with the remainder of airtime to be filled in with repeated programmes and themed playlists.
- To replace the requirement to broadcast mainstream popular music from the 1930s onwards with mainstream music from the 1960s onwards. Under the proposals, music from earlier decades would feature in specialist programmes and will no longer form part of the station's core music offer.
- To change the type of speech output by including a reference to national news in addition to the existing reference to local news.

We have taken a preliminary view on the request and are minded to allow the changes. However, we are seeking views on the requests before we make a final decision. The consultation closes at 5pm on Friday 8 November 2019.

## 2. Details and background information

- 2.1 The licence for each community radio service contains 'Key Commitments' which describe the type of programme service the licensee is required to provide.
- 2.2 Ofcom has received a Key Commitments change request from Secklow Sounds CIC, which holds a community radio licence for Milton Keynes, with regards to its service 'Secklow Sounds'. Secklow Sounds' target community is "people in Milton Keynes, and particularly the disadvantaged, and those from diverse backgrounds."

### Secklow Sounds CIC's licence

- 2.3 The station launched in June 2017.
- 2.4 The current Key Commitments are appended to this document as Annex 6. They can also be viewed on [the Ofcom website](#).
- 2.5 Secklow Sounds CIC has requested several changes, and a copy of its Key Commitments change request form is appended to this document as Annex 5.

### Statutory framework and considerations

- 2.6 Community radio services are licensed under the terms of three related pieces of legislation. In particular, the Community Radio Order 2004 (the "Order") applies modified versions of the provisions of the Communications Act 2003 (the "2003 Act") and Broadcasting Act 1990 (the "1990 Act") to community radio. The legislation sets out requirements that must be met for radio services to qualify as 'community radio services', including that such services are not profit-distributing, are provided for a target community, deliver social gain objectives, invite access and participation in the service, and are accountable to the target community.
- 2.7 Section 106(1) of the 1990 Act (as modified by the Order) requires that community radio licences include such conditions as appear to Ofcom to be appropriate for securing that the character of the licensed service (as proposed by the licence holder when making its application) is maintained during the period for which the licence is in force.
- 2.8 The way section 106(1) applies in practice is that, when a prospective licence holder applies for a community radio licence, it must set out its proposals as to the character of the service it intends to provide. Those proposals are summarised in what is known as a 'Key Commitments' document, which then forms the basis for the terms and conditions contained in the licence regarding the 'character of the service' and its delivery. Such terms and conditions are agreed with each licensee before the station starts broadcasting. (The 'licensee' is the organisation which holds the community radio licence.)
- 2.9 The Key Commitments document includes:
  - a description of the community to be served;
  - a summary of the character of service (a short description of the station's aims);
  - a description of the programme service;

- social gain objectives (including how the station will satisfy the mandatory social gain requirements set out in the legislation, and any other social gain objectives of the service);
  - access and participation arrangements; and
  - mechanisms to ensure accountability to the target community.
- 2.10 In determining the licence conditions that should be included in a licence under section 106(1) of the 1990 Act, section 106(1A) provides that Ofcom may, in particular, include conditions that enable it to consent to a “departure from the character of a licensed service” (or, in other words, the Key Commitments) should a licence holder subsequently request such a change. This is embodied in condition 2(5) of each community radio licence, allowing Ofcom to consent to changes in Key Commitments. Before Ofcom can give its consent, it must be satisfied that one of a number of statutory criteria has been fulfilled (see below). However, the legislation also gives Ofcom discretion not to consent to a proposed change, even if one of these criteria is satisfied.
- 2.11 The statutory criteria that Ofcom must apply when considering requests to change Key Commitments are set out in section 106(1A) of the 1990 Act (as modified by the Order), and are as follows:
- that the departure would not substantially alter the character of the service (section 106(1A)(a));
  - that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community (section 106(1A)(b));
  - that, there is evidence that, among persons comprising that community, there is a significant demand for, or significant support for, the change that would result from the departure (section 106(1A)(d));
  - that the departure would not 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 (section 106(1A)(e)); or
  - that the departure would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under that licence (section 106(1A)(f)).
- 2.12 Where Ofcom is considering whether or not to consent to a proposed change on the basis of sections 106(1A)(b), (d), (e) or (f) above, it is under a general obligation to consult with those who, in its opinion, are likely to be affected by the change. Ofcom is not, however, required to consult when it is satisfied that a proposed change satisfies section 106(1A)(a) - i.e. that a proposed change would "not substantially alter the character of the service". The term ‘character of the service’ is not defined in the legislation. We consider that it includes everything that is set out in each service’s Key Commitments section of its licence. For the avoidance of doubt, this goes beyond a sub-section in the Key Commitments document entitled ‘description of character of service’ to encompass the entirety of the Key Commitments annex to the licence.
- 2.13 The legislation leaves the decision as to whether to permit a change, even if one of the above criteria is satisfied, to Ofcom's discretion. There may be reasons (depending on the circumstances of the case) why Ofcom may not consent to the proposed change,

notwithstanding that one of the statutory criteria is met. We have [published criteria](#) we use to help us judge whether a request of this kind should be approved, namely:

- a) whether the proposed change conflicts with the community radio 'characteristics of service' set out in legislation;
- b) the time elapsed since the licence commenced;
- c) the reason for the change (including the environment in which the service operates and whether a station may need to adjust Key Commitments better to serve its target community);
- d) the extent of the impact of the change on the character of the service; and
- e) the avoidance of 'format creep' through a series of small changes.

2.14 We also take account of our general statutory duties, including:

- a) our principal duty to further the interests of citizens and consumers;
- b) our duty to secure the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests (including specifically a range and diversity of local radio services), as well as the maintenance of a sufficient plurality of providers of different services; and
- c) our duty to have regard to the different interests of persons in the different parts of the UK, of the different ethnic communities within it and of persons living in rural and in urban areas.

2.15 Where we consult, we will usually do so by publishing a consultation document on our website. We will usually include in that document a preliminary view about the request. That is not a decision, but a provisional view, subject to the consultation process, so that those who wish to respond to the consultation can do so on an informed basis. We then consider all the responses to the consultation and make our decision on the request.

## 3. Consideration of the requests and Preliminary View

- 3.1 Annex 5 contains Secklow Sounds CIC's Key Commitment change request. Secklow Sounds CIC wishes to change its published Key Commitments for the service Secklow Sounds in the following ways:
- a) To reduce the amount of original output from 100 hours per week to 40 hours per week; with the remainder of airtime to be filled in with repeated programmes and themed playlists.
  - b) To replace the broadcast of mainstream popular music from the 1930s onwards with mainstream music from the 1960s and onwards. Music from earlier decades will feature in specialist programmes, alongside a new commitment to air music from local and independent artists;
  - c) To add a requirement to broadcast national news. The station would continue to be required to broadcast local news, as well as traffic updates and local weather. The list of types of speech output is reordered to give prominence to interviews and discussions on issues affecting the local community, although this reordering does not substantively change the requirement.
- 3.2 The request is made on the basis the change would satisfy all five of Ofcom's statutory criteria in section 106(1A) of the 1990 Act, and that they are consistent with Ofcom's published policy criteria for such requests. Secklow Sounds CIC's full rationale is contained in the Key Commitment change request in Annex 5.
- 3.3 Secklow Sounds CIC state that the main reasoning for the proposed changes are "more to do with tightening some areas and ensuring we can deliver on our promises", particularly on achieving their minimum hours of original output under its Key Commitments.
- 3.4 The Licensee says that they want to place more focus on recent music to attract a younger demographic, as they regularly receive feedback requesting more modern music.
- 3.5 It believes that there will be no significant change to its speech content, but rather the proposed wording of the relevant Key Commitment will emphasise its priority of providing interviews and discussions on issues affecting the local community and will enhance the range of programming it offers. Furthermore, it states that they would continue to offer "opportunities" for the people of Milton Keynes as a community radio station.

### Ofcom's preliminary view

- 3.6 We have given initial consideration as to whether statutory criteria (a), (b), (d), (e) and (f), as outlined above in paragraph 2.11, would be met by Secklow Sounds CIC's Key Commitments change request. In doing so, we have considered the likely impact such changes would have on the current target community, particularly those who are most disadvantaged in Milton Keynes. Our preliminary views are as follows.

## Original output

- 3.7 We consider that the change in the amount of original output would substantially alter the character of the service (i.e. we are not satisfied in relation to criterion (a)). This is because it involves a very significant reduction in the number of hours of original output (from a minimum of 100 hours per week to a minimum of 40).
- 3.8 With regard to statutory criterion (e), we provisionally consider that the change in amount of original output would not be prejudicial to the access by members of the target community to the facilities used for the provision of the service and for training in the use of those facilities. The change request does not touch upon those aspects of the Key Commitments relevant to defining the target community and their involvement in the service.
- 3.9 We note, in addition, that Secklow Sounds CIC says in its request that the station will continue to accept work experience students and offer dedicated airtime to local charities, and relevant public bodies for public service content. We note that Secklow Sounds CIC has developed a schools programme for those with special needs, which is being rolled out across secondary schools and the local college of further education. We consider that Secklow Sounds CIC would continue to offer opportunities for its current target community ("people in Milton Keynes, particularly the disadvantaged, and those from diverse backgrounds") for access, participation and training.
- 3.10 In relation to our policy criteria, we provisionally consider that the changes maintain the characteristics of service as set out in legislation in terms of serving the defined community. We note reasons for the change including the station's proposed studio partnership with a local Academy and its impact on available 'live hours'. We also note that, notwithstanding that the reduction is likely to increase repeats and use of themed playlists, there will still be 40 hours a week (an average of nearly six hours a day) of original output and this is relevant to the extent of the impact on the character of service. We therefore provisionally consider we should exercise our discretion to allow the change.

## Music output

- 3.11 We consider that the change in relation to music output may also substantially alter the character of the service, given the specific requirement to include music from the 1930s, 40s and 50s is removed. However, we note that specialist programmes are further defined in the revised commitments as including earlier decades, and there is a new commitment to feature local and independent artists in specialist programming.
- 3.12 With regard to statutory criterion (e), we provisionally consider that the change in music output would not be prejudicial to the access by members of the target community to the facilities used for the provision of the service and for training in the use of those facilities. It may also be that statutory criterion (b) is met, to the extent earlier decades are still reflected in the specialist programmes requirement, and local and independent artists are now specifically mentioned which may have a positive impact on the range of programmes available.



- 3.13 In relation to our policy criteria, while it seems to us that the change in music output could have a significant impact on the character of the service in terms of Secklow Sounds' programming output, we also recognise that these changes should have much less of an impact (if any) on the station's ability to continue to comply with the core characteristics of a community radio service, and in particular its ability to deliver social gain for both the disadvantaged of Milton Keynes and the wider community. We also note that the extent of the impact on the character of the service is likely to be low given the retention of the reference to earlier decades in specialist shows. We therefore provisionally consider we should exercise our discretion to allow the change.

## Speech output

- 3.14 We do not consider the addition of a specific reference to national news or re-ordering of speech commitments would substantially alter the character of the service. An emphasis on local news and interviews and discussions on issues affecting the local community is retained, notwithstanding the additional reference to national news. We do not consider the ordering of the list of types of speech output to be a substantive change.
- 3.15 We therefore consider the change meets statutory criterion (a) and this aspect does not require consultation. In any event, by reference to our policy criteria, we consider it is appropriate to exercise our discretion to accept the change.
- 3.16 In light of the above, Ofcom's preliminary view is that at least one of the statutory criteria is met, and we are also satisfied with regard to our policy criteria. We are therefore currently minded to consent to the requested change to the Licensee's Key Commitments. However, we will pay close attention to any views of the current target community expressed in response to this consultation, as well as to the views of any other respondents.

# A1. Responding to this consultation

## How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on Friday 8 November 2019.
- A1.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-3/secklow-sounds-key-commitments-change-request>. You can return this by email or post to the address provided in the response form.
- A1.3 If your response is a large file, or has supporting charts, tables or other data, please email it to [broadcast.licensing@ofcom.org.uk](mailto:broadcast.licensing@ofcom.org.uk), as an attachment in Microsoft Word format, together with the [cover sheet](#), marking it for the attention of Hardeep Parmar.
- A1.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:

Broadcast Licensing  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
  - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 4. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A1.10 If you want to discuss the issues and questions raised in this consultation, please contact Hardeep Parmar on 0207 981 3640, or by email to [hardeep.parmar@ofcom.org.uk](mailto:hardeep.parmar@ofcom.org.uk).

## Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on [the Ofcom website](#) as soon as we receive them.
- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our [Terms of Use](#).

## Next steps

- A1.15 Following this consultation period, Ofcom plans to publish a statement in December 2019.
- A1.16 If you wish, you can [register to receive mail updates](#) alerting you to new Ofcom publications.

## Ofcom's consultation processes

- A1.17 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 2.
- A1.18 If you have any comments or suggestions on how we manage our consultations, please email us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk). We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA  
Email: [corporationsecretary@ofcom.org.uk](mailto:corporationsecretary@ofcom.org.uk)

## A2. Ofcom's consultation principles

**Ofcom has seven principles that it follows for every public written consultation:**

### **Before the consultation**

- A2.1      Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

### **During the consultation**

- A2.2      We will be clear about whom we are consulting, why, on what questions and for how long.
- A2.3      We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A2.4      We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A2.5      A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A2.6      If we are not able to follow any of these seven principles, we will explain why.

### **After the consultation**

- A2.7      We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

# A3. Consultation coversheet

## BASIC DETAILS

Consultation title: Secklow Sounds CIC's request to change Key Commitments

To (Ofcom contact): Broadcast Licensing

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

## CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☐

Name/contact details/job title ☐

Whole response ☐

Organisation ☐

Part of the response ☐

If there is no separate annex, which parts? \_\_\_\_\_

\_\_\_\_\_  
If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

## DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

## A4. Consultation question

Question 1: Should Ofcom consent to Secklow Sounds CIC's making the changes it proposes to the Key Commitments of Secklow Sounds, with particular regard to the statutory criteria set out in Section 2 of this consultation document? (Section 106 (1A) of the 1990 Broadcasting Act, as modified by the Community Radio Order 2004).

## A5. Key Commitments change request from Secklow Sounds CIC



### Key commitments change request form

<b>Community radio station name:</b>	Secklow 105.5 fm
<b>Licence number:</b>	CR100777
<b>Licensee (company name):</b>	Secklow Sounds CIC
<b>Contact name:</b>	Mike Johnson
<b>Date of request:</b>	18 June 2019

#### 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](mailto:broadcast.licensing@ofcom.org.uk)

<b>Existing Commitment (as in your published Key Commitments)</b>  Please only include one commitment change per row, and add more rows as necessary into the table.	<b>Proposed revised/new Key Commitment</b>	<b>Reason for proposed change</b>
Music. The main types of music broadcast over the course of each week are: mainstream popular genres from the 1930s to the present, and specialist music also features.	Music: The main type of music broadcast over the course of each week are; mainstream music across popular genres from the 1960s to the present day; specialist shows will feature local and other independent artists, plus music from earlier decades.	Primarily to provide music from the more popular years as standard; to attract a younger age-group, and allow more specialist shows to cater for other decades and genres.
Speech. The main types of speech output broadcast over the course of each week are: local news, weather, travel updates, plus interviews and discussions on issues affecting the local community.	Speech: The main types of speech output broadcast over the course of each week are: interviews and discussions on issues affecting the local community; national and local news; plus, local weather and traffic updates.	No major change here, just emphasising our priority.
The service provides original output for a minimum of 100 hours per week.	The service provides original output for a minimum of forty hours per week; the remainder of time will be filled with repeats and themed playlists.	We are recruiting new volunteers but wanted to reduce the minimum hours to an amount we can guarantee, whilst looking to deliver more. We are also taking into account a proposed new studio partnership with a local Academy which will impact our available 'live hours' due to their closing times.
The service provides all locally-produced output, with the exception of national news bulletins.	The service provides all locally-produced output, with the exception of national news bulletins.	No change here.



## Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified<sup>1</sup>) 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.<sup>2</sup> 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?	NO (Please explain why below)
We will continue to offer opportunities for the local communities to have access to radio. The proposed changes are more to do with tightening some areas and ensuring we can deliver on our promises.	
(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?	NO (Please explain why below)
Milton Keynes is well served with two Community Radio Stations, a Hospital Radio, and a range of online providers, so the range of programming available to the listener will not suffer.	
(c) Do you believe that there is evidence that, amongst persons comprising that community, there is a significant demand	YES (Please explain why below)

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

<sup>2</sup> 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.

for, or significant support for, the changes that you have proposed?	
The desire for more modern music is one of the comments we regularly receive, so we are addressing this. The speech content changes will actually enhance the range of programming we offer. Whenever the offer to appear on radio is extended, it is received with enthusiasm.	
(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?	NO (Please explain why below)
Secklow 105.5 remains one of the best ways to access local radio, especially FM radio. We are the leading station for Work Experience students and have offered dedicated air time to local charities and Parish/Town Councils for public service content. We have also developed a school's programme for learners with special needs to learn in a safe and familiar environment, and it is being rolled out across senior schools and the local College of FE.	
(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?	NO (Please explain why below)
Our social gain offering will still be strong; our priority is to have more programmes where the speech content is greater than music element; we see that as the best way of conveying information that is beneficial to the community. Our aim is, "Community First".	

<p><b>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</b></p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's <a href="https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf">published guidance on changes to Key Commitments</a> (<a href="https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf">https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf</a>).</p>
<p>We do not see these changes as having a substantial impact on the character of service, and we believe we remain in tune with the published guidance. We are committed to keeping the community at the heart of our offering; resisting the urge to become a more music or commercial-driven station. We believe we are meeting our social gain obligations in a positive way, in terms of the number of broadcast hours devoted to it.</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.

## A6. Secklow Sounds CIC's current Key Commitments

<b>Service name</b>	<b>Secklow Sounds</b>
<b>Licence area</b>	<b>Milton Keynes (urban area) (as shown in the licensed coverage area map)</b>
<b>Frequency</b>	<b>105.5 MHz</b>

### Description of character of service

Secklow Sounds is a radio service for people in Milton Keynes, and particularly the disadvantaged, and those from diverse backgrounds. It gives a platform to local emerging music and arts, and promotes the voluntary sector.

The service broadcasts:

- Music. The main types of music broadcast over the course of each week are: mainstream popular genres from the 1930s to the present, and specialist music also features.
- Speech. The main types of speech output broadcast over the course of each week are: local news, weather, travel updates, plus interviews and discussions on issues affecting the local community.
- The service provides original output<sup>1</sup> for a minimum of 100 hours per week.
- The service provides all locally-produced output<sup>2</sup>, with the exception of national news bulletins.

The studio is located within the licensed coverage area.

The service provides a range of community benefits (social gain objectives mandated by statute) for the target community, both on-air and off-air, and in doing so, achieves the following objectives:

- the facilitation of discussion and the expression of opinion,
- the provision (whether by means of programmes included in the service or otherwise) of education or training to individuals not employed by the person providing the service, and
- the better understanding of the particular community and the strengthening of links within it.

Members of the target community contribute to the operation and management of the service.

The service has mechanisms in place to ensure it is accountable to its target community.  
[June 2017]

## A7. Other commercial and community radio stations in the Milton Keynes licence area

### **Analogue commercial radio stations**

[Heart \(Milton Keynes\)](#) – ‘a locally oriented mainstream popular music and information station for under 44s in the Milton Keynes area.’

### **Analogue community radio stations**

[MKFM \(Milton Keynes\)](#) – ‘MKFM is for the people who live or work in Milton Keynes and surrounding villages. It provides a proudly local, mainstream community radio service, which promotes and supports the work of local charities and community groups and helps local businesses and people’.