

Radio Wyvern (Worcester)

Request to change Key Commitments

Consultation

Published 22 June 2026

Closing date for responses: 20 July 2026

For more information on this publication, please visit [ofcom.org.uk](https://www.ofcom.org.uk).

Contents

Section

1. Overview.....	3
2. Details and background information	4
3. Consideration of the request and Preliminary View	7

Annex

A1. Impact assessments	10
A2. Responding to this consultation.....	11
A3. Ofcom’s consultation principles.....	13
A4. Consultation coversheet	14
A5. Consultation questions.....	15
A6. Key Commitments change request from Youth Community Media.....	16
A7. Radio Wyvern (Worcester) current Key Commitments	26

1. Overview

- 1.1 A community radio station's Key Commitments set out the type of broadcast output it is required to deliver, and form a part of its licence. Key Commitments include a description of the character of the service, including the community to be served; social gain objectives; access and participation arrangements; and mechanisms to ensure accountability to the target community. When a proposed change to the Key Commitments would substantially alter the character of the service, the change request is subject to consultation. This document outlines the request received from Youth Community Media (or "the Licensee"), and Ofcom's preliminary view on the request.

What we are proposing – in brief

Ofcom is considering the Key Commitments change request submitted by Youth Community Media, which holds a community radio licence for Worcester broadcasting as 'Radio Wyvern'. The Licensee wishes to make the following changes:

- Change its character of service, such that the target community for the station is *"people who live, work, and study within Worcester"* instead of *"young people aged 11-25 in Worcester"*.
- Change the social gain aim specified in the character of service from *"It reflects a broad section of youth culture, with output produced for and by local young people. There is an emphasis on educational content, and the station tackles issues affecting, and of concern to, young people on a daily basis"* to *"It will include specialist programming designed to provide a voice for children and young adults"*.

- 1.2 We have taken a preliminary view on the request and are minded to approve the Key Commitment changes requested by the Licensee. However, we are seeking views on the request before we make a final decision. The consultation closes at 5pm on Monday 20 July 2026.

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, based on the commitments it made when applying for the licence.
- 2.2 Ofcom received a Key Commitments change request from Youth Community Media, which holds a community radio licence for Worcester, with regards to its service 'Radio Wyvern'. The station's target community is "young people aged 11-25 in Worcester".

Youth Community Media's licence

- 2.3 The Licensee commenced broadcasting in November 2007 as 'Youthcomm'. The station changed its name to 'Radio Wyvern' in October 2022.
- 2.4 The current Key Commitments are appended to this document as Annex 7. They can also be viewed on the Ofcom website here:
<https://static.ofcom.org.uk/static/radiolicensing/Community/commitments/cr000053.pdf>
- 2.5 A copy of the Key Commitment change request form submitted by Youth Community Media is appended to this document at Annex 6.

Statutory framework and considerations

- 2.6 Community radio services are licensed under the terms of related pieces of legislation. In particular, the Community Radio Order 2025 (the "Order") applies modified versions of the Communications Act 2003 (the "2003 Act") and the 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 the service (a short description of the station’s aims and programme service);
- social gain objectives (including how the station will satisfy the mandatory social gain requirements set out in the legislation);
- access and participation arrangements; and
- mechanisms to ensure accountability to the target community.

2.10 The description of the community to be served and the summary of the character of the service are both specific to the service in question. The objectives around delivery of social gain, access and participation arrangements and mechanisms to ensure accountability to the target community are identical across each community radio licence. The Key Commitments for all analogue community radio services were amended in accordance with Ofcom’s consultation and [statement](#) (published in November 2024) to streamline and simplify each set of commitments.

2.11 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.

2.12 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), 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 community radio services to persons comprising the relevant community; (section 106(1A)(b));
- that there is evidence that, amongst 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)(c));
- 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)(d)); 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)(e)).

2.13 Where Ofcom is considering whether or not to consent to a proposed change on the basis of sections 106(1A)(b), (c), (d) or (e) or 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.

- 2.14 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. 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 request and Preliminary View

- 3.1 Annex 6 contains Youth Community Media’s Key Commitment change request. Youth Community Media wishes to change its Key Commitments for the service Radio Wyvern in the following ways:
- Change its character of service, such that the target community for the station is *“people who live, work, and study within Worcester”* instead of *“young people aged 11-25 in Worcester”*.
 - Change the social gain aim specified in the character of service from *“It reflects a broad section of youth culture, with output produced for and by local young people. There is an emphasis on educational content, and the station tackles issues affecting, and of concern to, young people on a daily basis.”* to *“It will include specialist programming designed to provide a voice for children and young adults”*.
- 3.2 The request is made on the basis the change would satisfy at least one of the statutory criteria in section 106(1A) of the 1990 Act, and that it is consistent with Ofcom’s generally applied policy criteria for such requests. Youth Community Media’s full rationale is contained in the Key Commitment change request in Annex 6.
- 3.3 Our consideration of the request in relation to section 106(1A)(a), and our provisional consideration in relation to the other four statutory criteria, is set out below.

Section 106(1A)(a)

- 3.4 We consider that the change *could* substantially alter the character of the service (i.e. we are not satisfied in relation to criterion (a)).
- 3.5 This is because the requested change to the character of service would extend the target community of Radio Wyvern to all age demographics in Worcester, in addition to the current target community of young people aged 11-25 in the area. Generally, we consider that any change to a service’s target community is likely to be substantial, and in this case the revision of the target community would in our view result in Radio Wyvern no longer being a radio service that is specifically targeted at a younger audience.

Preliminary view

- 3.6 As we are not satisfied in relation to section 106(1A)(a), we are required to consult before deciding whether we are satisfied in relation to any of the remaining statutory criteria.
- 3.7 As noted in paragraph 2.15 we will usually include in the consultation a preliminary view about the request to allow those who wish to respond to the consultation to do so on an informed basis.
- 3.8 Our preliminary view on the request from Youth Community Media is as follows:
- 3.9 We are minded to be satisfied with regard to section 106(1A)(b) of the Broadcasting Act, that the departure would not narrow the range of programmes available to the target community of young people aged 11-25 in the area.

- 3.10 While the requested change would significantly broaden the target community to all people that *“live, work and study within Worcester”*, our preliminary view is that young persons aged 11-25 in the area would continue to have a range of programmes available to them on Radio Wyvern that would likely be of appeal, and therefore the choice of analogue radio listening for those in this demographic would not be narrowed. In reaching this view, we noted that the revised Character of service will still require the station to *“include specialist programming designed to provide a voice for children and young adults”*. The Licensee specified that this would focus on “short bursts” of content aimed at this demographic with “specialist shows... broadcast after 6pm when younger people might be listening after school and work and when younger talent is available”.
- 3.11 In reaching the above view, we were mindful of the fact that there is no other analogue community radio service in the area centred around the provision of local content that caters for all age demographics. We should emphasise that, if there was already another community radio service in the Worcester area broadcasting general local content for listeners of all ages, it is unlikely we would have reached this conclusion.
- 3.12 We are minded to be satisfied with regard to Section 106(1A)(d) of the Broadcasting Act 1990, namely that the changes if implemented 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. The Licensee, in making its request, stated that its current target community will continue to have access to the facilities of the service and the training it provides. Further, we agreed with the licensee’s view that a widening of the station’s target demographic is likely to lead to an increase in its volunteer numbers and advertising revenue, which may improve facilities and provide more training opportunities both for the existing and wider target community.
- 3.13 We are also minded to be satisfied with regard to section 106(1A)(e) of the Broadcasting Act 1990, namely that the proposed changes if implemented would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under that licence. The change may aid the licensee to better facilitate the delivery of social gain. In particular, we noted that the Licensee stated that “experienced presenters are available to join Wyvern to make us relevant to the city and train the next generation of broadcasters”. Consequently, we consider that expanding the target community will give the licensee the opportunity to facilitate a broader range of social gain initiatives, both by having a wider demographic to target these at, and through the potential for greater advertising revenue.
- 3.14 We are minded not to be satisfied with regard to section 106(1A)(c) of the Broadcasting Act 1990, namely that there is evidence that, among persons comprising the target community, there is a significant demand for the proposed changes.
- 3.15 The licensee provided evidence through notes taken in meetings with station volunteers that the target community would like the current Key Commitments updated, and would prefer the youth focused content to be delivered in a different and more contemporary way (for example, through shorter-form audio “reflecting TikTok-style consumption habits” rather than educational or issue-led programming segments which the licensee says “are actively disliked and quickly tuned out”).
- 3.16 However, the licensee did not provide us with evidence that the target community of 11-25 year-olds supported changing the target community to all people that *“live, work and study*

within Worcester” – although equally the evidence provided did not suggest members of the target community would be explicitly opposed to this. Consequently, we are keen to hear the views of members of the target community on this key aspect of the proposed changes to Radio Wyvern’s Key Commitments.

Policy Criteria

- 3.17 We have formed a preliminary view as to whether we would be willing to exercise our discretion to approve the request, given we are satisfied, on a preliminary basis, in relation to three of the statutory criteria. We have therefore considered the request in relation to our policy criteria for whether to approve Key Commitment change requests.
- 3.18 We are satisfied that the proposed changes to the character of service should not affect the Licensee’s ability to meet the characteristics of a community radio service. This is because Radio Wyvern will continue to be a not-for-profit, locally-based service that delivers social gain to its broadcast area.
- 3.19 We are satisfied that the Licensee has reasonable grounds for making this request. We agree that the proposal to make Radio Wyvern a broader-based local service could help improve volunteer recruitment, financial sustainability, and – consequently – the station’s ability to deliver social gain in Worcester and the surrounding area.
- 3.20 We are satisfied that the proposed changes will not result in ‘format creep’, where a series of small changes to the character of service, taken together, could result in a substantial alteration. We note that Radio Wyvern has not had any changes made to its Key Commitments since October 2016, and given this is a substantial change that proposes to remove the audience age target requirement entirely, this request is subject to public consultation. Therefore, we consider that listeners and stakeholders will have the opportunity to express their views on the proposed change.
- 3.21 Finally, we have taken into account the licensee’s rationale for the requested changes, and in particular the 2024 changes to analogue commercial radio regulation which mean that local commercial stations no longer have a requirement to produce any hours of locally-made programming. We also note that, under the Media Act 2024, Ofcom is no longer required to consider the Formats of local analogue commercial radio stations broadcasting in the area when taking a decision on whether a Key Commitments change would narrow the range of programmes available by way of independent radio services to persons comprising the relevant community. In this context, we think it is reasonable for Radio Wyvern to focus primarily on being a locally-based service, and to define its target age demographic more widely.
- 3.22 We are therefore minded to grant the request by Youth Community Media, on the basis that we are satisfied in regard to section 106(1A)(b), (d) and (e), and that we are satisfied to exercise our discretion to approve the request in relation to our policy criteria.

A1. Impact assessments

Impact assessment

- A1.1 Section 7 of the 2003 Act requires that, where we are proposing to do anything for the purposes of, or in connection with, the carrying out of our functions, and it appears to us that the proposal is important, we are required to carry out and publish an assessment of the likely impact of implementing the proposal, or a statement setting out our reasons for thinking that it is unnecessary to carry out such an assessment.
- A1.2 Ofcom is also required by statute to assess the potential impact of all its functions, policies, projects and practices on the following equality groups: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Equality Impact Assessments (EIAs) also assist us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers regardless of their background or identity.
- A1.3 We recognise that approving this request could potentially have an impact on those aged 11-25 in Worcester. However, we consider this impact would likely be significantly greater if the station was proposing to no longer provide relevant content and therefore serve its existing target community. Given that this is not the case, and the Key Commitments will retain an obligation to provide specialist programming designed to provide a voice for children and young adults, we judge the likely impact to be low.
- A1.4 We recognise that, as a result of the proposed change to the target community, there could potentially be fewer opportunities for potential volunteers aged 11-25 to become involved in the delivery of the service. However, we are satisfied that the Licensee has no plans to implement any changes that would be prejudicial to attracting volunteers in this age range, and the changes may result in Radio Wyvern being in a better position to provide volunteering and training opportunities.
- A1.5 We also recognise that supporting changes to strengthen a licensee's sustainability is likely to be a net positive to the radio service and the area to which it provides social gain in the medium- to long-term.
- A1.6 Other than on the basis of age, we have not identified any other potential equality impacts that would result from agreeing this request, given that we do not expect these changes to affect other aspects of the programme service, or the social gain delivered by the licensee, than those addressed above.

A2. Responding to this consultation

How to respond

- A2.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 20 July 2026.
- A2.2 You can download a response form from [here](#). You can return this by email or post to the address provided in the response form.
- A2.3 If your response is a large file, or has supporting charts, tables or other data, please email it to broadcast.licensing@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A2.4 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.
- A2.5 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).
- A2.6 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A2.7 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.
- A2.8 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 X. 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.
- A2.9 If you want to discuss the issues and questions raised in this consultation, please contact the Broadcast Licensing team by email to broadcast.licensing@ofcom.org.uk.

Confidentiality

- A2.10 Consultations are more effective if we publish the responses before the consultation period closes. 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 responses on the Ofcom website at regular intervals during and after the consultation period.
- A2.11 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.

- A2.12 If someone asks us to keep all or part of a response confidential, we will treat this request seriously and try to respect it. It is however for Ofcom to decide whether or not information is confidential. Sometimes we may consider it necessary to publish all or part of a response, including those that are marked as confidential (for example, so we can explain our decisions and people can understand our reasoning or in order to meet legal obligations).
- A2.13 Where this is the case (and the relevant information is not already in the public domain), we will normally first explain our intention to publish information from your response and give you the opportunity to raise concerns about the proposed publication. We will generally try to resolve any objections you may have through constructive dialogue. If we remain of the view that we need to publish all or part of your response and you continue to object, we will give you advance warning prior to publication.
- A2.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A2.15 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

- A2.16 Following this consultation period, Ofcom plans to publish a statement in July or early August 2026.
- A2.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A2.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 3.
- A2.19 If you have any comments or suggestions on how we manage our consultations, please email us at 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.
- A2.20 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

A3. Ofcom's consultation principles

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

Before the consultation

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

2. We will be clear about whom we are consulting, why, on what questions and for how long.
3. We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
4. When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses.
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.
6. If we are not able to follow any of these principles, we will explain why.

After the consultation

7. We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. 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.

A4. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

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 you selected 'Part of the response', please specify 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)?

Yes No

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 aims to publish responses at regular intervals during and after the consultation period. 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)

A5. Consultation questions

Please tell us how you came across this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

Question 1: Should Ofcom consent to Youth Community Media making the changes it proposes to the Key Commitments of Radio Wyvern, with particular regard to the statutory criteria set out in Section 1 of this consultation document? (Section 106(1A) of the 1990 Broadcasting Act, as modified by the Community Radio Order 2025).

Question 2: With reference to our impact assessment, do you agree with our assessment of the potential impacts of this proposal, including with regard to specific groups of people?

A6. Key Commitments change request from Youth Community Media

Key Commitments change request form

Community radio station name:	Radio Wyvern
Licence number:	CR000053
Licensee (company name):	Youth Community Media
Contact name:	Paul Ellery
Date of request:	April 7 th 2026

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
Radio Wyvern is for young people aged 11-25 in Worcester. It reflects a broad section of youth culture, with output produced for and by local young people. There is an emphasis on educational content, and the station tackles issues affecting, and of concern to, young people on a daily basis.	Radio Wyvern will serve as the local station for people who live, work, and study within Worcester. It will include specialist programming designed to provide a voice for children and young adults	<p>Decline in Youth Radio Engagement</p> <ul style="list-style-type: none"> • A panel of 30 young advisors revealed that school-aged and teenage listeners now prefer Spotify and YouTube for music, and TikTok for news. • If content doesn't engage them within 10 seconds, they disengage. • Educational segments, including a recent suicide prevention broadcast, were poorly received. • Young listeners only tolerate radio when "forced" by parents, preferring a varied music mix. <p>Radio Wyvern's local on-air activities will deliver benefits to young people, as well as charitable organisations and businesses within the Worcester area, while helping to foster social integration</p>

		<p>Funding Challenges</p> <ul style="list-style-type: none">• Worcester advertisers avoid targeting teenagers, who also dislike hearing ads.• Brands aiming at youth now use Instagram and Facebook for instant engagement. <p>Historical Context</p> <ul style="list-style-type: none">• Youthcomm Radio (now Radio Wyvern) launched in 2008, before smartphones and streaming apps.• The rise of 5G and platforms like Free Radio (Hits Radio) has made competition for youth audiences unsustainable. <p>Proposed Format Shift</p> <ul style="list-style-type: none">• Target age group: All people who live, work, and study within Worcester.• Content: General topics relevant to the youngsters in Worcester, not covered by the other local stations who are now national.• Talent: Experienced presenters are available to join Wyvern to make us relevant to the city and to train the next generation of broadcasters.• Younger Youth hard hitting content will be promoted on air by short bursts of audio as the younger generation now have a very
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		<p>short attention span and specialist shows will be broadcast after 6pm when younger people might be listening after school and work and when younger talent is available</p> <p>Music & Local Content</p> <ul style="list-style-type: none">• Local artist support will continue.• Plans for a local music show remain, pending. <p>News & Travel</p> <ul style="list-style-type: none">• And expanded 'local news' will air during breakfast, lunch time, afternoon, and early evening slots on weekdays.• Travel updates will follow a live "as it happens" model similar to Radio Wyvern in the 90's and 00's• National/international news will be broadcast hourly outside peak times—offering a service other stations don't. <p>Community Engagement</p> <ul style="list-style-type: none">• Community benefit broadcasts will continue but shift to short promotional segments.
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		<ul style="list-style-type: none">• Youth content will be condensed into short radio bursts, reflecting TikTok-style consumption habits.• Young people will still be able to access training at Wyvern (Youth community media) Youngsters from the local university want to join us but currently see the Key commitments as out of date <p>Governance & Participation</p> <ul style="list-style-type: none">• A youth board of 30 people (aged 12–25) helped manage the service, though all members resigned after a recent complaint was upheld.• Well-respected community leaders and key stakeholders are now stepping in to support station operations. (Police commissioner and local councillors want to be involved in a successful Radio Wyvern) <p>Commitment to Original Output</p> <ul style="list-style-type: none">• All content will remain original and first produced for Wyvern during weekdays.• Worcester lacks that strong localness and Bauer and the BBC have either totally cut or cut back local programming. We will be local 12 hours weekdays and have the technology
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		<p>to interrupt programmes at a moment's notice when major local events happen at any time, day or night.</p> <p>Strategic Imperative</p> <ul style="list-style-type: none">• To survive, Radio Wyvern must evolve from its current youth-focused remit (“for young people aged 11–25 in Worcester”) to a broader, locally resonant format that appeals to all Worcester’s Younger generation and a slightly older audience – who still listen to radio Without the change we will not have the finances to continue.
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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)
NO – it would enhance it – appealing to younger adults and older people who are crying out for a proper local station. We would still appeal to youngsters in the morning and school run and evenings but be relevant to older people 18+ during daytime work hours	
(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)
Wyvern is the only community analogue licence – we want to offer more local information to a wider age range – an age group that would listen to radio as research shows the current demographic don't tune in as much as they did and the youth audience is shrinking more each	

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.

year. We would still aim at the current younger age group in the breakfast show and school run and evening. Features would be 'tik tok radio' style to engage

(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)

Our research shows that younger people no longer listen as much as they used to. we want to continue to broadcast to younger listeners and include the older people to, who still consume radio

(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?

YES/NO
(Please explain why below)

No – our research shows that more local people would get involved with radio wyvern and that could create new jobs. Youngsters want to learn new media and that includes online, social media and radio

(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?

YES/NO
(Please explain why below)

Young people will be encouraged to get involved and I'm sure they will with a more mature station. indications show several will return if the conditions are more modern

Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.

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) (https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf).

We are requesting a change to our character of service to reflect the evolving media habits of our audience and ensure the long-term viability of Radio Wyvern. Our current remit—targeting 11–25 year olds—is no longer sustainable. Extensive consultation with our youth advisory panel (30 members aged 12–25) confirms that young people now consume music via Spotify and YouTube, and get news from TikTok. Educational or issue-led segments are actively disliked and quickly tuned out.

Even when “forced” to listen in the car, younger children prefer a varied music mix.

This aligns with national trends: 18–34 year olds now listen to 18 minutes less radio daily compared to 2016, with no sign of reversal (YouGov source).

When Youthcomm Radio launched in 2008, smartphones and streaming apps were not dominant. Today, we cannot compete with new global platforms such as Tik Tok, Snap Chat and Spotify.

We propose shifting our format to serve all youngsters and adults, with a focus on over 20’s in the day and some Youth specialist programmes on weekday evenings—those who still engage with radio and grew up with Wyvern would be catered for in Worcester. We will play local music and current hits. Songs Worcester residents know and love, including tracks Wyvern made famous.

We will continue to:

- Broadcast local artists (with content suitability checks)
- Deliver local news and travel updates at key times, plus hourly national/international bulletins outside peak hours 24 hours a day
- Provide 12 hours of local programming on weekdays, with a proposed reduction to 4 hours at weekends due to presenter availability
- Offer community benefit content to the 12 – 24 year old listeners via short promotional segments, not long-winded shows that kids don’t want.
- Retain original output first produced for and transmitted by Wyvern

Youth content will shift to short on air bursts, reflecting TikTok-style consumption. Our youth board has shrunk following recent complaints and this seems to be the only way to entice them back, we now have older community members supporting station governance.

- Worcester lacks that strong localness and Bauer and the BBC have either totally cut or cut back local programming.

We will be local 12 hours weekdays and have the technology to interrupt programmes at a moment’s notice when major local events happen

Industry Trends

- Radio 1, Capital and Kiss now cater for a much broader audience than just teenagers. Rajar listening shows a higher consumption by older listeners.
- Listeners aged 18–34 now consume 18 minutes less radio daily compared to 2016.
- Streaming dominates youth media habits, with no sign of reversal – not radio. Source: YouGov – Warning: Radio’s younger listeners turn to streaming

- Global/Capital has moved from CHR to broader musical repertoire over the last year to entice older listeners, while younger demographics have dropped year on year.

This proposed change fits Ofcom’s guidance by responding to demonstrable audience disengagement, ensuring continued community benefit, and preserving local identity and original output.

It reflects a proportionate and necessary evolution of our service to remain viable and relevant.

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

A7. Radio Wyvern (Worcester) current Key Commitments

Licence number: CR000053

Service name	Radio Wyvern
Licence area	Worcester (as shown in the licensed coverage area map)
Frequency	106.7 MHz

Description of character of service

Radio Wyvern is for young people aged 11-25 in Worcester. It reflects a broad section of youth culture, with output produced for and by local young people. There is an emphasis on educational content, and the station tackles issues affecting, and of concern to, young people on a daily basis.

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.

[November 2007. Revised October 2016. Revised March 2025]