

# Radio Wyvern (Worcester)

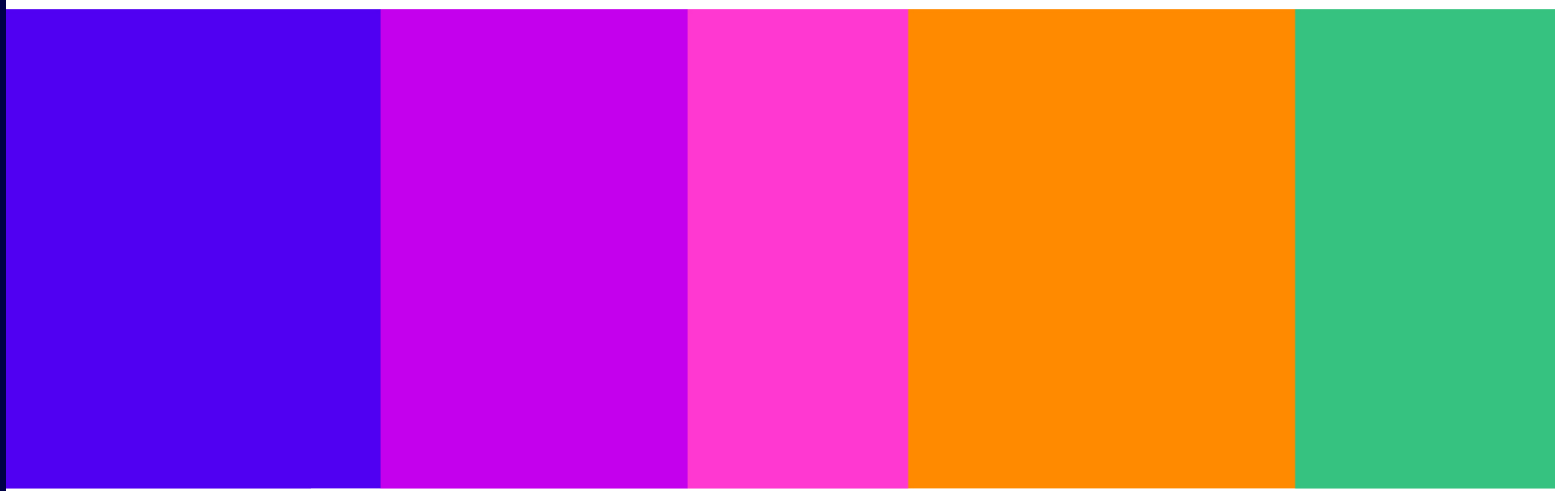
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Request to change Key Commitments

## Statement

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# 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.
- 1.2 When a proposed change to the Key Commitments would substantially alter the character of the service, the change request is subject to consultation. We published a consultation on the request received from Youth Community Media (or "the Licensee"), which closed on 20 July 2026, and our decision takes account of consultation responses received. The decision we have taken and our reasoning are set out in the full document below.

## What we have decided – in brief

Ofcom has decided to approve the Key Commitments change request submitted by Youth Community Media, which holds a community radio licence for Worcester broadcasting as 'Radio Wyvern'. The Licensee will 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"*.

## 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

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- 2.3 The Licensee commenced broadcasting in November 2007 as ‘Youthcomm Radio’. The station changed its name to ‘Radio Wyvern’ in October 2022.
- 2.4 Radio Wyvern’s current Key Commitments can be viewed on the Ofcom website [here](#).
- 2.5 A copy of the Key Commitments change request form submitted by Youth Community Media is appended to the consultation document at Annex 6. This can be viewed on the Ofcom website [here](#).

### Statutory framework and considerations

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- 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 Decision

- 3.1 Youth Community Media wishes to change its Key Commitments for its 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 was made on the basis the change would satisfy at least one of the statutory criteria in section 106(1A) of the 1990 Broadcasting 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 Commitments change request in Annex 6 of the consultation document.
- 3.3 We considered that the change could substantially alter the character of the service (i.e. we were not satisfied in relation to criterion (a)).
- 3.4 This was 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. 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.
- 3.5 As we were not satisfied in relation to section 106(1A)(a), we were required to consult before deciding whether we are satisfied in relation to any of the remaining statutory criteria.

## Ofcom’s Preliminary View

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- 3.6 In the consultation we set out our provisional view that we were minded to grant the request, on the basis that we were satisfied in regard to section 106(1A)(b), (d) and (e) of the Broadcasting Act, and that we were also satisfied to exercise our discretion to approve the request in relation to our policy criteria.

## Statutory criteria

- 3.7 We were minded to be satisfied with regard to section 106(1A)(b), that the departure would not narrow the range of programmes available to the target community of young people aged 11-25 in the Worcester area. This was on the basis that that while the requested change would significantly broaden the target community to all people that *“live, work and study within Worcester”*, 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 explained 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”.

- 3.8 In reaching the above view, we were also 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 noted 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.
- 3.9 We were also 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 would be 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.
- 3.10 Finally, we were 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. 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 considered that expanding the target community would 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.

## Policy criteria and impact assessments

- 3.11 We also considered this request against Ofcom’s published policy criteria. We were satisfied that the service will both continue to meet the characteristics of a community radio service and ensure it continues to deliver its character of service and social gain objectives to its target community.
- 3.12 In the impact assessments we conducted in the consultation (see annex A1 of the consultation), we recognised that approving the request could potentially have an impact upon those aged 11-25 in Worcester. However, we considered this impact would likely to 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 that 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.
- 3.13 We also recognised 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 were 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 in fact result in Radio Wyvern being in a better position to provide volunteering and training opportunities for young people.

## Summary of consultation responses

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- 3.14 We received two responses to the consultation, both of which were confidential.
- 3.15 One respondent was supportive of the change request, arguing that the proposed changes would support Radio Wyvern in better serving and appealing to those in the 11-25 demographic, claiming this demographic has an interest in a wider array of styles and genres of music, as well as broader local content. It consequently also challenged the impact assessment's finding that there may be a detrimental impact on those aged 11-25. We disagree with this view on the basis that the broadening of the target community could have a potential impact on those aged 11-25, which is minimised, but not completely eliminated, by the retained commitments to provide specialist programming designed to provide a voice for children and young adults.
- 3.16 The other respondent was opposed to Ofcom's preliminary view, stating that Ofcom should refuse the request and that the licence should instead be re-advertised if the current licensee no longer wished to serve the existing target community.
- 3.17 In particular, the respondent argued that Ofcom should not be satisfied with regard to Section 106(1A)(b), that the change would not narrow the range of programmes available by way of community radio services to persons comprising the target community. It stated that, because youth programming would now be scheduled mainly in off-peak evening slots and that speech content regarding issues affecting young people would now be delivered through short speech segments, "for a listener aged 11 to 25, the range of programming provided plainly narrows". The respondent claimed that Ofcom's reasoning was being conducted from the standpoint of the general population of Worcester, rather than the Radio Wyvern's existing target community (of 11-25 year-olds).
- 3.18 We note that the statutory criteria refers to the range, rather than volume, of programming relevant to the target community. Consequently, our view is that the range of programming will not be narrowed for the target community, even if that programming is generally confined to particular dayparts (when we also note that the target audience is more likely to be listening). Given the commitments made by the Licensee outlined in paragraph 3.7, Ofcom remains satisfied with regard to Section 106(1A)(b).
- 3.19 The respondent also argued that Ofcom should not be satisfied with regard to Section 106(1A)(d) and (e), noting that the applicant itself had referred in its change request to the departure of the existing youth volunteers from the service's governance structure. However, we do not consider that this objection, based on previous events at the service and focused on the practical delivery of the service, are relevant to the consideration of a Key Commitment change.
- 3.20 As set out in the consultation, our view is that the broader community appeal and potentially increased advertising revenue would be likely to improve the facilities, training opportunities and range of social gain initiatives available for the existing target community of 11-25 year-olds. Given the assurances made by the Licensee that the current target

community will continue to have access to its training and facilities, we remain satisfied with regard to both Section 106(1A)(d) and (e).

- 3.21 The respondent also outlined its belief that our Preliminary View was not consistent with the approach taken by Ofcom in previous cases where there has been a proposal from a community radio licensee to change the target community of its service. Based on the nuanced details of this case and the others cited, we disagree with this point. We also note that changes contained in the 2024 Media Act mean that Ofcom no longer has to take into account the programming commitments of commercial radio stations serving the area when deciding whether or not a change to a community radio station's Key Commitments would narrow the range of available programmes to persons comprising the relevant community.
- 3.22 The respondent also argued that our Impact Assessment should have found that there would be a significant impact on those aged 11-25, based on the arguments highlighted above. Given our response to these points, we maintain that our judgement that the impact is likely to be low.
- 3.23 The respondent further argued that a decision to allow this change could have the impact of undermining public confidence in the basis on which licences are awarded by Ofcom, given the original licence award would have been made in a competitive process on the basis that a 'youth' station would be provided. We disagree with this point, not only because the revised Key Commitments will require Radio Wyvern to continue to serve the youth audience in Worcester, but on the basis that both the radio and broader media landscape continually evolves. It is for that reason that the legislation allows community radio stations to apply for changes to their Key Commitments, including changes to the target audience.
- 3.24 Finally, the respondent also raised issues outside of the scope of this specific Key Commitments change request consultation, including calls for new rounds of FM community radio licensing; changes to Ofcom's processes for revoking or surrendering licences; and changes for Ofcom's processes in dealing with Key Commitment change requests. Some of these issues, notably those around community FM licensing, are addressed in our [consultation on Licensing Priorities](#) published in February this year, the outcome of which is due to be published imminently.

## Ofcom's decision

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- 3.25 Ofcom has considered the views set out in the consultation responses and set out our responses above. For the reasons stated, we do not consider the consultation responses provide a sufficient basis for us to depart from our preliminary view.
- 3.26 We have therefore decided to agree to the Key Commitment change request submitted by the Licensee as we are satisfied with regard to section 106(1A)(b), (d) and (e) of the Broadcasting Act 1990, and with regard to our published policy criteria.