

## Key Commitments change request form

<b>Community radio station name:</b>	Celtic Music Radio
<b>Licence number:</b>	CR000257BA/3
<b>Licensee (company name):</b>	Celtic Music Radio LTD.
<b>Contact name:</b>	Alex Jenkins
<b>Date of request:</b>	29/10/2023

### Details of requested change(s) to Key Commitments

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

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

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

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

Please complete this form and return it to: [broadcast.licensing@ofcom.org.uk](mailto:broadcast.licensing@ofcom.org.uk)

Existing Commitment (as in your published Key Commitments)	Proposed revised/new Key Commitment	Reason
Please only include one commitment change per row, and add more rows as necessary into the table.		

The service provides original output for a minimum of 11 hours per day.	The service will produce a minimum 50 Hours output Per Week	During the COVID-19 pandemic, Celtic Music Radio found that our resources were stretched to the point where our schedules were compromised. While we do not plan to reduce any of our broadcasts, we believe it is sensible to adjust our commitments to ensure that we can maintain our key commitments in times of dire emergency. By committing to a weekly total, our ability to ensure compliance will be easier to meet.
The service provides locally-produced output for a minimum of 13 hours per day.	The service will produce community produced output, we aim to produce 50 hours per week minimum	We do not plan to reduce our output

### Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified) 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.

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 intend to continue providing a high-quality service, and we have no plans to reduce our output. However, recent events have convinced us that we need to review our commitments. The COVID-19 pandemic exposed a potential weakness in our system, which resulted in increased pressure on individuals. Our intention is to ensure that we will be able to comply with Ofcom's requirements in all circumstances.	
(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)
We intend to continue providing a high-quality service to our customers and have no plans to reduce our output. However, recent events have led us to review our commitments, as the COVID-19 pandemic exposed a potential weakness in our system, resulting in increased pressure on individuals.  We are committed to ensuring that we can continue to comply with Ofcom's requirements in all circumstances.	
(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?	
We have no plans to change our programme schedules, so our listeners will not be affected.	
(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)
We are committed to continuing to provide a high-quality service to our listeners and have no plans to reduce our output. However, recent events have led us to review our commitments, as the COVID-19 pandemic exposed a potential weakness in our system, resulting in increased pressure on individuals. We are taking steps to address this weakness and ensure that we can continue to comply with Ofcom's requirements in all circumstances.	
(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)
We are committed to continuing to provide a high-quality service to our listeners and have	

no plans to reduce our output. However, recent events have led us to review our commitments, as the COVID-19 pandemic exposed a potential weakness in our system, resulting in increased pressure on individuals. We are taking steps to address this weakness and ensure that we can continue to comply with Ofcom's requirements in all circumstances. In particular, we will be reviewing our staffing levels and our workload management procedures.

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

We are pleased to announce that we have no plans to change our schedules. We are committed to providing our listeners with a high-quality service, and we are always working to improve our ability to comply with our key commitments.

Our experience during the COVID-19 emergency highlighted a number of potential weaknesses in our system. We are taking steps to address these weaknesses and ensure that we can reliably meet our commitments in all circumstances.

We are grateful for the support of our listeners, and we look forward to continuing to provide them with the best possible service.

### **Data Protection**

We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom's [General Privacy Statement](https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement) (<https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement>) for further information about how Ofcom handles your personal information and your corresponding rights.

Amended May 2018

### **Ofcom notes on the request**

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

The Licensee is requesting to convert its Key Commitments on original output and locally-produced output from daily to weekly requirements, but also to reduce them from 11 hours per day (77 hours per week equivalent) and 13 hours per day (91 hours per week equivalent) respectively to 50 hours per week in both cases. This would represent an approximate 35% reduction to the Licensee's original output requirement and a 45% reduction to the Licensee's locally-produced requirement. In requesting these changes the Licensee has stated that the proposal would give it additional flexibility to deliver the licenced service.

While these are relatively large reductions, we consider that 50 hours per week of original, locally-produced, output should still be enough to ensure the station remains able to deliver on its Key Commitments to "offer a strong cultural voice, promoting the performance, learning and appreciation of a broad spectrum of Celtic music" and to provide its required mix of Celtic music and speech-based features. As such, we are satisfied these changes do not substantially alter the character of the service.

In terms of our policy criteria, Ofcom is satisfied the change will not affect the station's ability to meet the community radio 'characteristics of service' set out in the legislation, and there are no other policy reasons to refuse the change. We have therefore decided to exercise our discretion to approve this change.

December 2023