

Key Commitments change request form

Community radio station name:	Link FM
Licence number:	CR100157BA/3
Licensee (company name):	The Pakistan Muslim Centre
Contact name:	Irfan Khan, LINK FM CEO
Date of request:	07/09/2023

Details of requested change(s) to Key Commitments

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

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

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

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

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

Existing Commitment (as in your published Key Commitments) Please only include one commitment change per row, and add more rows as necessary into the table.	Proposed revised/new Key Commitment	Reason for proposed change
<p>Original output• for a minimum of 11 hours per day.</p> <p>Locally-produced output• for a minimum of 13 hours per day.</p>	<p>Original output: The LINK FM would like to request the Ofcom, for reduction of our current commitment of delivering original output as live show from 11 hours per day down to 6 hours a day i.e. a total of 42 hours per week.</p> <p>Locally produced output: We would like to request reduction of Locally produced output from a minimum of 13 hours per day down to 10 hours per day.</p>	<p>The LINK FM’s request for reduction of our key commitment of original outputs from 11 hours down to (6 hours a day) i.e. 42 hours per week.</p> <p>We have observed that many of our volunteers are facing challenges due to the high cost of living. They are not able to dedicate as much time to live programming as they did in previous years.</p>
		<p>Furthermore, we have been limited in our ability to participate in community events, charity functions, and fairs, which are essential for engaging with the public in an off-air capacity. We consider these activities vital for building strong community ties and facilitating discussions in a non-live environment.</p>

		<p>With a reduction in original output, we intend to redirect our focus towards engaging with the public directly. This will empower our volunteers to provide comprehensive community coverage, including capturing audio in the field for broadcast purposes.</p>
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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)
The proposed LINK FM changes will not substantially alter the character of the service. We will still deliver key topics that would be very beneficial to our community such as health, education, employment, legal issues etc.	
(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)
The proposed change in reduction of hour will not narrow the range of programmes available to the relevant BME community served by the LINK FM. We will still focus on main areas even in situation of hour reduction.	
(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)
N/A	

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.

(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)
<p>No, our LINK FM station will welcome all sectors of the community for voluntary work. Therefore, the proposed changes in reduction of hour will not be prejudicial to the access by BME members of that community to the LINK FM facilities used for the provision of the service and for training. The PMC has strong link with local university and job centre and via these organizations, a number of young people will be directed to the PMC to gain volunteering experiences in radio broadcasting, sound mixing, editing etc.</p>	
(e) Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the service provided under your licence?	YES/NO (Please explain why below)
<p>We strongly believe that the proposed changes would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under the licence. We will still target presenters of different ethnic backgrounds comprising of Pakistani, Bangladesh, Somali, Yemeni, Indian, Siri Lankan, etc. They will present shows of interest to the diverse community of Sheffield from education, training, political and legal with the aim to entertain and inform listeners whilst encouraging inclusion and community engagement, There will be a constant drive by the PMC to recruit new volunteer as presenters for these shows. This will be done via social media such as Facebook and hourly recorded adverts played in the Link FM.</p>	

<p>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's published guidance on changes to Key Commitments (https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf).</p>
<p>The PMC is engaged in new voluntary recruitment of presenters, allowing work experience potential to local people of diverse background in radio broadcasting, and the PMC is regularly presenting a variety of program to entertain the diverse BME community to make everything inclusive. However as mentioned earlier, due to time off from work by our presenters and volunteers due to personal commitment, other health issues etc and volunteers are unable to cope with raised in fuel price, LINK FM is finding very difficult to manage live show of 11 hours per day.</p> <p>The LINK FM would like to request the Ofcom, for reduction of our current commitment of delivering original output as live show from 11 hours per day down to 6 hours a day i.e., a total of 42 hours per week.</p> <p>Also, we would like to request reduction of Locally produced output from a minimum of 13 hours per day down to 10 hours per day.</p>

Data Protection

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

Amended May 2018

Ofcom notes on the request

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

The Licensee has asked to reduce its original output requirement and convert it from a daily to a weekly requirement, and also to reduce its daily locally produced output. The station has requested a reduction of 43% in its original output requirement, from an equivalent of 77 hours per week to 42 hours per week; and a 24% reduction in its locally produced output, from a minimum of 13 hours per day to a minimum of 10 hours per day. The Licensee has explained that changing circumstances due to the cost-of-living crisis have affected the availability of its volunteer base, which has in turn affected the amount of original and locally produced output it is able to broadcast each week. Additionally, the Licensee stated that with a reduction in their original output they would be able to dedicate more time to community engagement by attending various local events and functions which will help to serve their local output and community coverage.

We are generally happy to approve requests to convert a daily original output requirement to a weekly requirement, understanding that this provides greater flexibility to stations in managing their resources over the course of a week without affecting the service provided to listeners. Ofcom recognises that the time volunteers can dedicate to a station has changed alongside the economic situation. In this particular case, though, the licensee is also requesting a reduction in its original output requirement. However, while the requested reduction is relatively sizeable, we do not believe it would substantially alter the overall character of the service delivered to listeners as the genre of content supplied will remain the same and the station has committed itself to maintaining the scope of programmes offered. The requested reduction in locally-produced output is smaller in magnitude, and for the same reason we do not consider it would be likely to substantially alter the character of the service.

We have also considered this request under our policy criteria, and consider that there are no policy reasons to refuse this request. As we are satisfied under Section 106(1A)(a) of the Broadcasting Act 1990, that the character of the service would not be substantially altered by the change, we have decided to exercise our discretion to approve the change.

October 2023