

## Key Commitments change request form

<b>Community radio station name:</b>	Pride Radio
<b>Licence number:</b>	CR102268
<b>Licensee (company name):</b>	Pride Community Network Ltd
<b>Contact name:</b>	Richard Kell
<b>Date of request:</b>	10/03/2024

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

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

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

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

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

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

<b>Existing Commitment (as in your published Key Commitments)</b> Please only include one commitment change per row, and add more rows as necessary into the table.	<b>Proposed revised/new Key Commitment</b>	<b>Reason for proposed change</b>
Pride Radio currently provides locally produced output for a minimum of 14 hours per day	Pride Radio will provide locally produced output of a minimum of 65 hours per week	Changing our hours will help us maintain a workable delivery of locally produced programming which will ease the strain on current resources

## Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified<sup>1</sup>) Ofcom must be satisfied that your proposed changes **meet at least one of the criteria referred to below**.

Please indicate which of these criteria you believe your proposed changes satisfy by deleting YES or NO as applicable and provide an explanation for why you consider a particular criterion is met in the relevant box. You should note that even if Ofcom is of the opinion that your explanation of your proposed changes meets one or more of these criteria, there may still be reasons why Ofcom is unable to consent to the change. When explaining your proposed changes, it is not enough to state that you believe one of the criteria is met. You must also demonstrate *why* you consider that at least one of these criteria is met.

In particular, if Ofcom is not satisfied that the changes would not substantially alter the character of the service (criterion (a) below), Ofcom cannot consent to the change without consulting on your proposals.<sup>2</sup> If this is the case, we will contact you to confirm that you are happy for us to consult on your proposed changes, and whether you wish to make any changes to your request in light of the need to make it public.

As part of our consideration of your request to make changes to your Key Commitments, we require applicants to provide an explanation for **at least one** of the criteria below.

(a) In your judgement would the proposed changes substantially alter the character of the service?	YES/NO (Please explain why below)
The changes will not alter the character of service which we currently provide. It will help us sustain a more workable service based on availability of future volunteers and take in to account sickness, holidays, circumstances of volunteers.	
(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)
All current programmes remain in place, with volunteers training, extra hours will be added in due course	
(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)
The changes will allow us to be more flexible with volunteers and programming and relieve pressure from management and team, with this change it could open up more opportunities and expand on our current programming	

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

<sup>2</sup> Ofcom may approve a change under any of criteria (b), (c), (d) and (e) without consultation, or after a consultation of less than 28 days, if Ofcom considers that to hold a consultation at all, or for 28 days or more, would result in a delay that would be likely to prejudice the interests of the licensee. Ofcom may also remove for the purposes of consultation any confidential information submitted by the licensee.

(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to the	YES/NO (Please explain why below)
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facilities used for the provision of the service and for training in the use of those facilities?	
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Nothing will change , if anything it will enhance our current service.

(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)
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There will be no changes to social gain delivery

**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)).

Pride radio has served our local lgbt+ community for over 5 years on fm, and the previous 5 years online. We continually engage with the community and broadcast from our local scene, to special events and services fully engaging us with our target community. Our volunteer base are passionate and fully engage in the station and its work, with future volunteers and workshops planned

**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.

### 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 change its locally-produced output requirement from a daily to a weekly total. In doing so, it is also requesting a reduction in the amount of locally-produced output it is required to broadcast, from an equivalent of 98 hours per week to a new total of 65 hours per week, which represents a reduction of roughly one-third. The Licensee has requested this change to provide it with more flexibility in managing its volunteer resources and programming schedule.

We are generally happy to agree to changes where a licensee is requesting to move from a daily to a weekly output requirement, as we recognise that this provides licensees with more flexibility, which can be especially important in volunteer-resourced organisations. While the reduction requested is relatively large, we do not believe this to be a significant reduction that would result in a substantial change to the overall character of the service delivered to listeners.

We have considered this request under our policy criteria and consider that there are no policy reasons to refuse this request. We are satisfied that the licensee will be able to continue to provide a service for its target community, and that this change will not prevent the service from meeting the characteristics of a community radio service or reduce the amount of social gain provided to listeners. We have therefore decided to exercise our discretion to approve the change.

*May 2024*