

## Key Commitments change request form

<b>Community radio station name:</b>	The Point (Secklow Sounds CIC)
<b>Licence number:</b>	CR100777
<b>Licensee (company name):</b>	Secklow Sounds CIC
<b>Contact name:</b>	Darren Dorrington
<b>Date of request:</b>	9 <sup>th</sup> April 2024 (amended 29 <sup>th</sup> of May 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>
The service provides all locally-produced output , with the exception of national news bulletins.	The service provides locally produced output for a minimum of 100 hours per week.	This change allows contributions from the wider borough of Milton Keynes rather being restricted to much smaller broadcast area.

## 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)
No – The change will enable the station to have a wider range of volunteers who prefer to contribute from home.	
(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)
No – The change will widen the range of programmes through the station be accessible to a wider base of volunteers.	
(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)
Yes – Milton Keynes is much bigger than the broadcast area and The Point currently excludes many residents that fall outside of this area,	
(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to the	YES/ <b>NO</b> (Please explain why below)

<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.

facilities used for the provision of the service and for training in the use of those facilities?	
No – Training will be offered in our studios in addition to phone and video calls.	
(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)
No – the change will result in higher social gain	

<p><b>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</b></p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom’s <a href="https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf">published guidance on changes to Key Commitments</a> (<a href="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</a>).</p>
As above

**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 has requested to reduce the amount of locally-produced output it is required to broadcast. It is currently required to broadcast locally-produced output at all times except for national news bulletins, and it has requested to reduce this requirement to 100 hours per week, a reduction of roughly 40%. While this is a relatively substantial reduction in the locally-produced output requirement, the current requirement for all of the station's broadcast output to be locally-produced is extremely high and we are satisfied that the Licensee will continue to broadcast a large proportion of locally-produced output. The Licensee has requested this change to give it more flexibility to include shows broadcast remotely by volunteers living outside its coverage area, including in other areas of Milton Keynes<sup>3</sup>. We are happy to agree this change to provide the Licensee with this flexibility.

In terms of our policy criteria, Ofcom is satisfied that the change will not affect the station's ability to meet the characteristics of a community radio service, nor affect its ability to deliver social gain to its target community, and there are no other policy reasons to refuse this request. We have therefore decided to exercise our discretion to approve this change.

*June 2024*

---

<sup>3</sup> Locally-produced output is any output made and broadcast from within the service's licensed coverage area.