

Key Commitments change request form

Community radio station name:	Heritage Radio
Licence number:	CR102298BA/1
Licensee (company name):	British Muslim Heritage Centre
Contact name:	Anjum Rafiq
Date of request:	16/1/2024

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

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
Original output1 for a minimum of 15 hours per day. Locally-produced output2 for a minimum of 12 hours per day.	The Heritage Radio is formally requesting Ofcom to consider a reduction in our current live show commitment from 15 hours per day to 8 hours per day. Additionally, we are seeking a reduction in locally produced output, proposing a decrease from a minimum of 12 hours per day to 8 hours per day.	The Heritage Radio seeks a modification in our primary commitment for original content, proposing a reduction from 15 hours to 8 hours per week. This adjustment is prompted by the recognition of challenges faced by our volunteers, who are grappling with the increasing cost of living. As a result, they find it difficult to allocate the same amount of time to live programming as they have in the past years.
		Moreover, our involvement in community events, charity functions, and fairs has been constrained, impeding our capacity to engage with the public outside of on-air activities. We view these endeavours as crucial for fostering robust community connections and facilitating discussions in a non-live setting.
		By scaling back on original output, our aim is to shift our focus towards direct engagement with the public. This strategic adjustment will empower our volunteers to offer more comprehensive community coverage, including the capture of field audio for broadcast purposes.

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?	NO (Please explain why below)
The anticipated alterations to Heritage Radio will not significantly change the essence of the service. We remain committed to delivering essential topics that hold considerable value for our community, covering areas such as health, education, employment, legal issues, and more.	
(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)
The proposed reduction in hours will not limit the variety of programs accessible to the relevant BME community served by HERITAGE RADIO. Even with a decrease in hours, our focus on key areas will persist.	
(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	
(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)
Certainly not, our HERITAGE RADIO station is open to voluntary contributions from all sectors of the community. Consequently, the proposed reductions in hours will not adversely affect the access of BME members within the community to the HERITAGE RADIO facilities used for service provision and training.	

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.

<p>Furthermore, HERITAGE RADIO maintains robust connections with local colleges, universities and job centres, through which several young individuals will be directed to gain valuable volunteering experiences in radio broadcasting, sound mixing, editing, and more. There are added podcast facilities in our centre which offer a further attraction to Media students who we hope will also engage with our radio station.</p>	
<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?</p>	<p>NO (Please explain why below)</p>
<p>We are confident that the proposed changes will not undermine the social benefits derived from the service provided under the license. We will continue to target presenters from various ethnic backgrounds, including Pakistani, Bangladeshi, Somali, Yemeni, Indian, and more. These presenters will host shows covering a wide range of topics such as education, training, politics, and legal matters, aiming to entertain and inform the diverse communities of South Manchester. Our commitment to fostering inclusion and community engagement remains unwavering. HERITAGE RADIO will actively seek new volunteers as presenters for these shows, utilizing social media platforms such as Facebook, Tiktok, Insta, and X and is already airing hourly recorded adverts on Heritage Radio for recruitment purposes.</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>HERITAGE RADIO is actively recruiting new presenters on a voluntary basis, providing valuable work experience opportunities for local individuals from diverse backgrounds in radio broadcasting. The station consistently delivers a variety of programs to entertain the diverse BME community, promoting inclusivity. However, challenges such as time off from work by presenters and volunteers due to personal commitments, health issues, and difficulties coping with the rise in fuel prices have made it increasingly challenging to sustain a live show of 15 hours per day.</p> <p>Nevertheless, we are better positioned to manage a proposed live show of 6 hours per week, leveraging the expertise of our paid station manager, dedicated voluntary board members, and community volunteers. We sincerely hope you will consider our request favorably.</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.

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 from 15 hours per day to 8 hours per day (a 47% reduction) and its locally produced output requirement from 12 hours per day to 8 hours per day (a 33% reduction). The Licensee has explained that changing circumstances due to the cost-of-living crisis have affected the time its volunteer base has been able to dedicate to the service, 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 its involvement with community events has been constrained, due to the time dedicated to meeting its current output requirements. This has in turn reduced its ability to engage with the community off-air. It states that a reduction in its original output would allow it more time to refocus on engagement with the community and to empower its volunteers.

While these are relatively large reductions, we consider that a total of 56 hours per week of original and locally-produced output should still be enough to ensure the station remains able to deliver on its Key Commitments to provide a “local service for the Muslim community in Whalley Range and surrounding areas” and to reflect “the social, cultural, traditional and spiritual aspects of the Muslim community, and works to strengthen community integration and cohesion”. We also believe the reduction would allow the station to invest additional time into its off-air social gain requirement, which would strengthen links within the community. As such, we are satisfied these changes do not 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. We have therefore decided to exercise our discretion to approve the change.

February 2024