
Community Digital Sound Programme

(C-DSP) licence

Application form – Part A (public)



Name of applicant (i.e. the body corporate that will hold the licence):

Legacy901 Community Interest Company

Proposed service name:

Legacy 90.1FM

Radio multiplex service(s) on which the proposed C-DSP service is to be provided:

Manchester and Salford

Public contact details: Dawne Bones

1 Parsonage Street, Manchester, M15 5WD

016112220292

Legacy901fm@gmail.com

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1. Overview

You should complete this form if you are applying for a community digital sound programme licence (“C-DSP”). You can find further information about C-DSP services in the [guidance notes for licensees and applicants](#).

This application form is divided into two parts – **Part A** (which we will publish on our website) and **Part B** (which will be kept confidential). This document constitutes Part A; [Part B of the application form](#) is available on our website.

If you encounter any issues using these forms, please contact broadcast.licensing@ofcom.org.uk.

The purpose of this form

- 1.1 You should complete this form if you are applying for a Community Digital Sound Programme (C-DSP) licence.
- 1.2 A digital sound programme service intended for broadcast by means of a local or small-scale radio multiplex service requires either a C-DSP licence or a local DSP licence. Ofcom’s published guidance notes set out some of the key issues that potential applicants need to consider in deciding which type of licence is suitable for them. In summary, C-DSP services are not run for financial gain and are required to provide social gain. C-DSP licences therefore include strict conditions to ensure that happens and provide less flexibility than a local DSP licence. However, they do provide access to capacity that small-scale radio multiplex service providers are required to reserve solely for C-DSP services.
- 1.3 A C-DSP licence will be required even if the same programme service is also provided on any other platforms (e.g., FM, satellite), as separate licences are required for those.
- 1.4 As noted above, small-scale radio multiplex services will have reserved capacity for C-DSP services. Issue of a C-DSP licence does not, however, guarantee carriage on a small-scale (or local) radio multiplex service. That is a matter for agreement between the C-DSP licensee and the multiplex service provider, and there may be more C-DSP licences issued in a locality than there are reserved slots on the small-scale radio multiplex service. Note that a C-DSP service does not necessarily have to broadcast using reserved capacity. It can use unreserved capacity on a small-scale radio multiplex service or capacity on a local radio multiplex service, again subject to agreement with the multiplex service provider.
- 1.5 An application for a C-DSP licence will be accepted only once Ofcom has advertised the licence for the small-scale radio multiplex service upon which the proposed C-DSP service is intended to be provided. There is no closing-date by which an application for a C-DSP licence must be submitted (i.e., it can be submitted at any time after the licence for the relevant small-scale radio multiplex licence has been advertised).
- 1.6 You can find further information about how to determine if a service requires a C-DSP licence in Section 2 of the [guidance notes for applicants and licensees](#).

Provision of information

- 1.7 Ofcom requires complete and accurate information to assess applications. This is so that we can assess your application against statutory criteria, consider whether those involved in the body applying for a licence are ‘fit and proper’ to hold a licence, and determine whether their involvement with other organisations disqualifies them from participation in a licence.
- 1.8 It is an offence under the Broadcasting Act 1996 (as amended) to provide false information or withhold relevant information during the application process and may be grounds for revocation of a licence subsequently granted.

Publication of information about applications and licensed services

- 1.9 Information provided in **Part A** of the application form will be published by Ofcom following the submission of your application. Information provided in **Part B** will not be published.
- 1.10 In submitting this application, you agree that, should a licence be granted, Ofcom may publish contact details for the licensee (specified in Section 2 of Part B of the application form), which may include personal data, on the Ofcom website and/or in other relevant publications. If you have any questions about the information that we publish, or there are any changes to this information, you should contact the Broadcast Licensing team by email (broadcast.licensing@ofcom.org.uk).
- 1.11 Ofcom considers issued C-DSP licences to be public documents and copies of licences will be made available to third parties on request albeit, other than the Key Commitments which are tailored to the service, C-DSP licences are standard form documents. A brief description of the licensed service will be published on the Ofcom website, along with the Key Commitments which form part of the licence.
- 1.12 Ofcom publishes a [monthly radio licensing update](#) which lists new services licensed, licences revoked, licence transfers, and changes to licensed services during the past month.

Data protection

- 1.13 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](#) for further information about how Ofcom handles your personal information and your corresponding rights.

Keeping up to date with broadcasting matters

- 1.14 We strongly recommend that the appropriate person at the applicant body signs up to receive Ofcom’s regular email updates on broadcasting matters including notification when the Broadcast and On Demand Bulletin is published.

- 1.15 To sign up to receive these communications, you must visit [the email updates area of our website](#) and select 'Broadcasting.'

2. Applicant's details

About this section

In this section we are asking you for details about the applicant company. This must be a body corporate which is not profit distributing.

In the first part of this section, we are asking for basic details about the applicant. These include company registration number and contact information.

In the second part of this section, we are asking for details of the applicant's officers (directors or, in the case of LLPs, designated members), its shareholders and participants. Where applicable, we are also asking for details of the officers of the applicant's parent and associated companies or LLPs etc.

If any of the individuals named in your responses are known by more than one name/version of their name, all names must be provided.

Certain persons are disqualified from holding a C-DSP licence. This section asks the questions which enable us to consider this for those types of disqualification which apply specifically to bodies corporate. It also asks questions which are relevant to our assessment of the applicant's fitness and propriety to hold a C-DSP licence.

Before completing this section of the form, you should read [Ofcom's guidance on the definition of 'control' of media companies](#). Throughout this section, "control" has the meaning it is given in Part I of Schedule 2 of the Broadcasting Act 1990.

The response boxes and tables should be expanded or repeated where necessary or provided in a separate annex.

'Officerships' in this section refers to: directorships of bodies corporate, designated memberships of LLPs, or membership of a governing body of an unincorporated association (including partnerships).

Applicant information and contact details

- 2.1 Name of applicant (i.e., the body corporate that will hold the licence):

Legacy901 CIC

- 2.2 Company registration number stated on Companies House:

CR000164WT/4

- 2.3 For UK registered companies, the address of the applicant's registered office stated on Companies House.

For non-UK registered companies, the principal office address:

- 2.4 If a UK registered company, is the **current** Memorandum and Articles of Association document available on the Companies House website?

Yes/No (delete as appropriate)

If no, please submit the up-to-date document and indicate you have done so in the checklist in Section 4 of Part B.

- 2.5 Contact details of the individual duly authorised by the applicant for the purposes of making this application. This individual should be the company secretary, a director or (if an LLP) designated member.

(If you are an agent completing the form on behalf of the applicant please do not enter your details here – see paragraph 2.25 of the [guidance notes](#)).

Full name	Dawne Bowes
Job title	Director
Address	1 Parsonage Street Manchester M15 5WD
Telephone	0161 222 0292
Mobile phone	07908465314
Email	legacy901fm@gmail.com

- 2.6 If the proposed Licensed Service has/will have a website, please provide the website address below.

https://legacy901.com

- 2.7 How will the service be financed? If the applicant is receiving, or is likely to receive, any form of funding and/or financial assistance to establish and maintain the service, please provide details of who is providing that funding/financial assistance and the extent of it.

If you are receiving funding from, or on behalf of, a source that could be considered a political organisation or a religious body, you must set out the nature of that organisation here.

Legacy901 CIC and the community radio station we manage, Legacy 90.1FM are funded via a mix of charitable grants, donations, and advertising/sponsorship revenue.

Our operating costs are funded from various advertisers and sponsors.

Ownership and control of the company which will hold the licence

Details of officers, participants, and shareholders of the applicant

2.8 Please provide the following details for each director or designated member of the applicant:

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Dawne Josephine Bowes	19 Craigmere Avenue, Manchester, M20 2XL	UK	Manchester Carnival Together CIC	Trainer
Akeim Mundell BEM	19 Craigmere Avenue, Manchester, M20 2XL	UK	N/A	Pastoral Leader & School Governor
Stacy-Ann Smith	52 Brunt Street, Manchester, M14 4BE	UK	N/A	Customer Services

2.9 Please identify any entities with which the applicant is affiliated:

(If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of the entity	Address
N/A	

¹ This should be the same address as is held and published by Companies House.

- 2.10 Complete the following table, expanding it, if necessary, to list all bodies corporate which are controlled by the applicant, and their affiliates:

Full name of entity	Address	Affiliates
N/A		

- 2.11 Complete the following table, expanding it, if necessary, to list all persons who control the applicant, together with their affiliates. If any persons or bodies control the applicant jointly because they act together in concert (e.g., because of a shareholder's agreement), each such person must be identified here:

Full name of individual or body	Address	Affiliates
N/A		

- 2.12 Complete the following table, expanding it, if necessary, to list all officerships in other bodies that are held by any individual listed in response to question 2.11, and any affiliates of those bodies:

Full name of individual	Name of body in which officership held	Affiliates of that body
N/A		

- 2.13 Complete the following table, expanding it, if necessary, to list all bodies corporate which are controlled by any body corporate listed in response to question 2.11, and their affiliates:

Full name of body corporate listed in 2.11	Body corporate controlled	Affiliates of body corporate controlled
N/A		

- 2.14 In relation to each body corporate identified in response to question 2.11, complete the following table, expanding it, if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, amounting to more than 5% in the body corporate concerned ("participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 2.11. If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

Name of body corporate identified in response to question 2.11				
Full name of >5% participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
N/A				
Comments				
The company does not offer shares.				

Involvement of the applicant in specified activities

- 2.15 Please state below whether the applicant, or any of the directors, shareholders or other individuals named above, including their associates (i.e., directors of their associates and other group companies), is, or is involved in, any of the below, and the extent of that interest.

Activity/involvement	Yes or No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
A local authority	No	
A body whose objects are wholly or mainly of a political		

nature, or which is affiliated to such a body	No	
A body whose objects are wholly or mainly of a religious nature; ²	No	
An individual who is an officer of a body falling within (b) or (c);	No	
A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	No	
An advertising agency or an associate of an advertising agency	No	

Details of applications, licences, and sanctions

2.16 Is the applicant a current licensee of Ofcom?

Yes (delete as appropriate).

If yes, please provide the licence details expanding the table if necessary:

Licence number	Name of multiplex
CR000164WT/4	Legacy 90.1FM

2.17 Has the applicant held an Ofcom broadcasting licence before?

No (delete as appropriate).

Licence number	Name of service or multiplex
N/A	

² Please refer to Sections 3 to 5 of [Ofcom's religious guidance note](#) for details on how we determine the eligibility of religious bodies to hold certain broadcasting licences.

- 2.18 Has anyone involved in the proposed service, held an Ofcom broadcasting licence, or been involved in an Ofcom-licensed broadcast service before?

No (delete as appropriate).

If yes, please provide the details expanding the table if necessary:

Dates licence was held or dates of involvement	Licence number (if known)	Name of service or multiplex
N/A		

- 2.19 Does the applicant control an existing Ofcom licensee?

Yes / No (delete as appropriate).

If yes, please provide the licence details expanding the table if necessary:

Licence number	Name of service or multiplex
CR000164WT/4	Legacy 90.1FM

- 2.20 Is the applicant controlled by an existing licensee or by any person who is connected (within the meaning of Schedule 2 to the Broadcasting Act 1990) with an existing licensee (i.e., as a “participant”)?

No (delete as appropriate).

If yes, please provide the following information, expanding the table if necessary:

Licence number	Name of service or multiplex
N/A	

- 2.21 Has the applicant made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

No (delete as appropriate).

If yes, please provide the following information, expanding the table if necessary:

Licence number	Name of service or multiplex
N/A	

- 2.22 Is the applicant subject to any current or pending investigation by any statutory regulatory or government body in the United Kingdom or abroad in respect of any broadcast-related matter?

No (delete as appropriate).

If yes, please provide the following details expanding the table if necessary:

Licence number (or equivalent)	Name of service or multiplex	Details of the investigation
N/A		

- 2.23 Has the applicant – or any person(s) controlling the applicant – ever been subject to a statutory sanction for contravening a condition of a broadcasting licence in the UK or any other jurisdiction?

No (delete as appropriate).

If yes, please provide the following details relating to each sanction expanding the table if necessary:

Licence number (or equivalent)	Name of service or multiplex	Nature of the breach	Sanction im- posed	Date sanction imposed
N/A				

- 2.24 In relation to any of the directors, shareholders or other individuals named in this application, please provide any information which you think may be a relevant consideration for Ofcom in determining whether or not the applicant is fit and proper to hold a Broadcasting Act licence. If the applicant or the form signatory fails without reasonable excuse at this point to declare any matter of which Ofcom subsequently becomes aware, and which we do consider to be relevant to the applicant's eligibility to hold a licence, we will take it into account in determining the question of whether the applicant/licensee remains fit and proper to hold a licence.

If you have no information to provide, please respond "N/A".

N/A

- 2.25 Has the applicant – or any person(s) controlling the applicant – ever been convicted of an unlicensed broadcasting offence?

No (delete as appropriate).

If yes, please provide the following details:

Full name	Date of conviction/action (dd/mm/yy)	Penalty
N/A		

3. The proposed service

About this section

This section asks you to describe your proposed service, including the Key Commitments you propose to include in your licence. This includes your service name, multiplex name, and character of service, in addition to standard commitments that all C-DSP licensees need to abide by. If a licence is granted, the information you provide in this section will be used to form the basis of the annex to your licence. You will only be authorised to broadcast what is detailed in the annex of the licence.

In this section, you will also need to set out how your service will provide social gain, community participation and how you will be accountable to the target community. This is in line with statutory requirements for the granting of C-DSP licences.

If you hold, or intend to hold, multiple C-DSP licences, the answers given in this section and the intended delivery of your Key Commitments must apply to the locality in which your proposed service will broadcast (as set out in the Draft Key Commitments in this application form).

Your proposed service and target community

3.1 What is the proposed service name?

Legacy 90.1FM

3.2 On which radio multiplex service do you intend to broadcast? If the relevant radio multiplex licence has not yet been awarded, please state the name of the area that the multiplex service is intended to cover, as defined in the multiplex licence advertisement.

Manchester and Salford

3.3 Where is your proposed studio located? Please note that this must be located within the coverage area of the small-scale radio multiplex service identified in answer to 5.2 (or the advertised area for a small-scale radio multiplex service that has not yet been awarded).³

1 Parsonage Street, Manchester, M15 5WD

³ If you propose to provide your service on a local, rather than a small-scale, radio multiplex service, there is no requirement for your studio to be located within the licensed area of that local radio multiplex service.

- 3.4 If the proposed service is a simulcast of an existing licensed radio service, please list that below and provide the licence number.

CR000164WT/4

- 3.5 What is the target community of the service? Please include the geographical area that you wish to serve in addition to the interests or characteristics that define your target community. The area you wish to serve must be geographically located within the coverage area of the radio multiplex service on which you intend to broadcast. **Answer in fewer than 400 words.**

Legacy 90.1FM is a community radio station primarily, but not exclusively, targeting people of African and Caribbean heritage living, working, and visiting the geographical area of Greater Manchester, encompassing the ten boroughs of Manchester, Salford, Trafford, Tameside, Oldham, Rochdale, Bury, Bolton, Stockport and Wigan and Leigh. The areas we serve have a population of 2.87 million people with an average of 3.87% identifying as Black, Black British, Black Welsh, Caribbean or African and a further 2.79% identifying as of Mixed or Multiple Ethnicity. This rises to 11.9% and 5.3% respectively in Manchester where the station is based.

The service aims to promote a feeling of cultural identity, community pride and cohesion, inclusivity, and recognition of achievement amongst the community it serves. The service provides a platform for diverse voices to be heard on important issues and showcases new talent.

Programming is a mix of 70% music and 30% a package of discussion, debate, information, and signposting. The service supports local communities by highlighting issues, providing up to date information and acting as a communication hub for local services and activities.

The station promotes local events, musicians, and entertainment, providing a media outlet for arts and cultural activities within the area.

The service promotes local businesses, encouraging people to shop local and raising awareness of new initiatives, particularly those that help to support disadvantaged and vulnerable people.

- 3.6 How will you ensure that your proposed C-DSP service is run on a not-for-profit basis? Please give details of specific measures or arrangements in place to ensure this, and how any profit will be wholly and exclusively used for securing or improving the future provision of the service, or for the delivery of social gain. **Answer in fewer than 400 words.**

This application is being made by an existing community interest company that took over management of Legacy 90.1FM on 2nd March 2023 from Peace Full Media Limited (PFML) who managed the station from 2008 to 2nd March 2023. The PFML board transferred to Legacy901 CIC, bringing all their experience and knowledge of managing a community radio station with them.

Legacy901 CIC's legal structure ensures that the company is non-profit making. The three directors are volunteers, as are all the station's DJs. The company is limited by guarantee and the directors cannot receive a dividend. If the company makes a profit, it is reinvested into the radio station and the community projects the station delivers.

The station's licence requires it to meet key social commitments each year and Legacy901 CIC's legal structure requires it to report on its social benefit to the CIC regulator each year.

Legacy901 CIC's Articles of Association include an asset lock that requires the assets of the company to be transferred to a named charity if the company is wound up. The company's objects within its Articles of Association state that its activities must benefit the community.

Social gain

- 3.7 What community benefits will your service bring to your target community(ies) and, if applicable, the general public. Please include summaries of evidence to support your answer, including details about other organisations you intend to work with. **Answer in fewer than 500 words. Please do not provide names of individuals in your answer.**

Legacy 90.1FM is a community radio station with a team of 40 volunteer DJs who have a deep connection to African and Caribbean communities in Greater Manchester.

In the past, the station has provided youth training, volunteering and community projects that provide opportunities for local people to gain skills and knowledge that open opportunities within the media industry. The service is committed to discussion and debate, and amplifying Black voices on important local, regional, and national issues.

DJs interview key personnel from local community organisations, charities, schools, and other services, on a regular basis, promoting their services and activities and providing them with a platform to ensure key messages reach a large population.

DJ/presenters talk about what's going on in the community, including events and issues which they promote on their own social media channels as well as on air. Legacy 90.1FM has strong links with local organisations, working closely with them to ensure important information reaches listeners.

One of our directors and some of our volunteers are involved in organising and delivering the well-established and widely recognised Manchester Caribbean Carnival which is an annual event that celebrates African and Caribbean music, culture, and food. 2023's event was attended by a diverse audience of 47,000 people including 70 local traders. Legacy901 CIC is a valued partner and DJs perform hosting duties at the event each year.

The station's advertising rates are affordable with different packages that businesses and sponsors can tailor to their budget. The station often discounts advertising costs for local charities and other non-profit groups.

We are currently seeking funding to train young people to perform radio plays, podcasts, and music programmes. This is something we have done successfully in the past and are committed to resurrecting. A DAB licence will provide us with opportunities to offer more training, community shows and projects to people across a wider area.

- 3.8 Please summarise how your service will facilitate discussion and the expression of opinion. Answer **in fewer than 200 words**.

The service facilitates discussion and the expression of opinion through community shows encouraging debate on important issues. The station delivers community projects such as Let's Talk, a series of 11 shows in the last quarter of 2021 that interviewed 22 local people to discuss the impact of Covid on African and Caribbean communities in Manchester. In 2023, the station delivered 12 cost of living community shows to support and offer guidance to people struggling financially through the cost-of-living crisis. Currently, the station is delivering 6 shows debating the issues around blood donation within the Black communities in Manchester. These shows have engaged local organisations including MSV Housing, Citizen's Advice, The Tenant's Union, Maternity Action, Greater Manchester Law Centre, and Greater Manchester Immigration Aid Unit which helps to spread confidence among local experts to share information and facilitate discussion via the radio station on a long-term basis.

All shows include text and email interaction with some DJs taking calls from listeners during shows.

In addition to delivering community shows, the station encourages people to comment on the its social media platforms and these comments are considered by the Board when they are making decisions about programming, community projects and the future direction of the station.

- 3.9 How will you ensure that members of your target community(ies) can gain access to the facilities used to provide your service, and receive training in using these? In particular, please set out how this will be done practically, formally and/or informally. **Answer in fewer than 400 words.**

Legacy 90.1FM is based within an area of Manchester (Moss Side and Hulme) with a large African and Caribbean population (33% at the 2021 Census). The station base is well known, and people visit it regularly to talk to DJs, to find out what Legacy is working on and to express their opinions. Legacy 90.1FM DJs and directors are well known locally and are often stopped on the street or in local venues by listeners and the wider community.

The station has a long-established training programme and works with schools, youth organisations and local agencies to identify young people who would benefit from training in radio broadcasting and production. 2 new DJs have joined the team in 2023 and a key priority for 2024 is to set up youth performances to showcase local talent and teach radio skills to young people. We are hoping that this encourages 2-3 young people to join the station as DJs to contribute to the long-term sustainability of the station and to refresh the schedule, so it attracts a younger audience.

- 3.10 How will your service provide better understanding of your target community and the strengthening of links within it? **Answer in fewer than 200 words.**

We interact in different ways with the communities that we serve by attending community events, speaking to people on the street, in shops and at other common venues such as churches. Our directors and volunteer DJs are deeply embedded in the African and Caribbean communities in Greater Manchester, and they have strong familial and friendship links. People regularly give them suggestions and share their views when they see members of our team out and about locally.

In addition, we have a long history of encouraging listeners to share their views via phone calls during shows, texts, and emails and on social media. We use these comments to shape our decision making.

Our DJs provide our board with intelligence they gain through their own listeners, about the key issues affecting local people and how the station can provide support and information to help people with those issues. For example, our recent community shows addressing the cost-of-living crisis developed from intelligence that told us that there was a need for easily accessible and culturally relevant information and advice from trusted sources.

- 3.11 Please summarise the relevant experience of the group or its members in activities related to the provision of social gain or other relevant non-broadcast areas (such as third sector, training, or education). **Answer in fewer than 200 words.**

Our Station Manager has a long-established background in social housing and youth training in relation to the Manchester Caribbean Carnival. One of our directors was a director of a youth social enterprise for 10 years, training and mentoring young people and organises the Manchester Caribbean Carnival.

Another director is the youngest person to be appointed as an Assistant Principal at a grammar school and he had a pastoral role within schools prior to his recent appointment. He was awarded a British Empire Medal for his service to the third sector.

We work with a freelancer who has a background in business, the public sector in Children's Services and regeneration and in the third sector as a director of a training and mentoring social enterprise. They support the station with governance, fundraising and marketing.

Participation

- 3.12 How do you propose to ensure that members of your target community(ies) are given opportunities to participate in the operation and management of the service? **Answer in fewer than 400 words.**

Our team is made up of volunteers with support from freelancers as needed. Our DJs, technical team, Station Manager and the Director Board are all volunteers. 87% are from African and Caribbean communities in Manchester or Greater Manchester. They have links to the African and Caribbean communities in Moss Side and surrounding areas where the station is based.

They have a wide variety of roles including presenting, production, event management, social media, administration, interviewing, technical management, station management, scheduling, financial management, organisational management and marketing and promotion. We invite members of the community to become part of Legacy 90.1FM by providing DJ and radio training, inviting people from the community to become DJs when these roles are available and involving people in the organisation and delivery of events and community projects.

We advertise opportunities on air, via our social media channels, on our website, through local events organised by other local organisations and through the social media channels of our working partners.

Our volunteer programme helps people build skills and confidence in radio broadcasting and production, gain a following, showcase their music knowledge and style and gain a reputation as a DJ/presenter. In return they bring their skills, experience, and community links to the station, helping us to stay connected to our target communities.

Accountability

- 3.13 How will members of your target community contact your service and influence its operation? **Answer in fewer than 300 words.**

As mentioned previously, our DJs and Board have strong links to the local community and wider African and Caribbean communities across Greater Manchester. Local people feel ownership of the station and are confident in giving us their comments when they see members of our team on the streets locally.

Our more confident DJs encourage interaction with their shows. People can call in, text, or email their comments to DJs during live shows, and they comment via social media. We have Facebook, Instagram and Twitter which is monitored by volunteers and supported by the freelancer.

We attend local events and some of our DJs host special events within the community – weddings, birthdays, etc. This gives them opportunities to talk more informally with people and they bring any suggestions, comments, or complaints back to the Board to inform decision making and learning.

The station is based within the largest African and Caribbean community outside London and local community members often visit in person.

The deep connections our team have to this community and wider communities across Greater Manchester gives them an insight into the key issues affecting people and opportunities to discuss how they want Legacy 90.1FM to support them.

- 3.14 How will suggestions and/or criticisms from members of your target community(ies) be considered and acted upon? **Answer in fewer than 300 words.**

We have a management What's App group set up and a DJ What's App group. The DJ group is the main form of communication for DJs/presenters to communicate any suggestions or criticisms from members of the community to the Board. The Board discuss these and feedback to the DJs and, where appropriate, also directly to the people who have brought the suggestion or complaint.

Where there is a risk of more serious consequences, for example, a safeguarding or compliance issue, the Board will act immediately to rectify using the policies and procedures we have in place.

Draft Key Commitments

Service name: *the on-air name of the programme service (as in question 3.1 of this application)*

Legacy 90.1FM

Proposed radio multiplex service: *as in question 3.2 of this application, specify if small-scale or local multiplex the radio station plans to broadcast on*

Manchester and Salford SSDAB

Description of target audience:

African and Caribbean communities of Greater Manchester

Description of locality, which can be all of, or a subset of, the area covered by the radio multiplex service specified above:

Greater Manchester

Brief statement of main purpose of the radio service, its functions/activities: *describe in no more than 50 words.*

Legacy 90.1FM is targeted at, but not exclusively for African and Caribbean communities. It offers a cohesive and inclusive voice for these communities, including those who are vulnerable, disadvantaged, or isolated. It promotes peace, tackling issues of discrimination and encouraging equality of opportunity through offering opportunities for people to become involved in radio broadcasting and production.

The text below is included in the Key Commitments in all C-DSP licences and does not need to be amended or augmented. Every service is required to comply with these requirements, but the details of how each service does so do not need to be included in the Key Commitments.

The studio of the Licensed Service is located within the coverage area of the Small-Scale Radio Multiplex Service identified above (n.b. the Licensee will not be in breach of this requirement if an existing studio ceases to fall within the coverage area merely as a result of technical changes to the Small-Scale Radio Multiplex Service outside the control of the Licensee).

The Licensed Service shall have the characteristics of a Community Digital Sound Programme Service as set out in the 2019 Order and, in so doing, shall achieve the following objectives:

- the facilitation of discussion and the expression of opinion,
- the provision (whether by means of programmes included in the service or otherwise) of education or training to individuals not employed by the person providing the service, and

- the better understanding of the particular community and the strengthening of links within it.

Members of the target community shall contribute to the operation and management of the service.

The service shall have mechanisms in place to ensure it is accountable to its target community in the specific area or locality.

4. Compliance of the service

About this section

This section asks you to describe the compliance arrangements for the proposed licensed service, i.e., the arrangements which the applicant will put in place to ensure that the content it proposes to broadcast will comply with the relevant regulatory codes and rules for programming and advertising. These include:

- The Ofcom Broadcasting Code
- The BCAP Code: the UK Code of Broadcast Advertising
- The Phone-paid Services Authority Code of Practice

Condition 17 of a C-DSP licence requires that you have compliance procedures in place, and this section asks that you demonstrate your ability to meet this licence condition.

Before completing this section of the form you should read Section 4 of the [C-DSP guidance notes](#), where you will also find links to the codes and rules listed above.

- 4.1 Will the individual named as Compliance Contact in response to question 2.3 in Part B have overall responsibility for compliance for the duration of the licence?

Yes (delete as appropriate)

- 4.2 Please give details of all compliance training and compliance experience (including dates) the person named in response to question 2.3 in Part B has received in the relevant codes and rules (for example, those referred to in the box at the start of this section).

The Station Manager has been involved in the day to day running of Legacy 90.1FM since 2008. They have taken the station through a change of name and more recently, a transfer of management of the station from Peace Full Media Limited to Legacy901 CIC. This process necessitated a review of compliance measures and a review of the social benefit of the station to get agreement from Ofcom for the transfer.

They have also worked with the rest of the Manchester DAB CIC group to ensure compliance in preparation for moving onto the Manchester and Salford SSDAB multiplex and they are currently, updating equipment and systems to ensure that the station is ready to move onto digital broadcasting.

- 4.3 How many staff does the applicant have (or plan to have) in its compliance team? Please provide a brief description of the functions each person will be performing. Please do not give names of individual members of staff.

The Station Manager will be responsible for compliance and compliance training. They will ensure that content complies with the relevant regulation codes, and they will act as a point of contact for Ofcom, the public and anyone else for compliance issues.

The Station Manager will be supported by experienced DJ/presenters who have worked for both community and commercial radio stations and by our volunteer technical team who have over 10 years of radio experience.

- 4.4 How does the applicant intend to train staff in compliance procedures? Please include details of the compliance training that will be given to those responsible for live programming, including compliance staff, presenters, and producers.

New volunteer DJs/presenters are trained in compliance as part of their induction. This training is delivered by the Station Manager and volunteer DJs are required to sign an agreement to say they have read and understood their responsibilities in relation to compliance and they will comply with The Ofcom Broadcasting Code.

Producers are trained when they start working with the station and they are also required to sign an agreement to say they will comply with The Ofcom Broadcasting Code.

The Station Manager is responsible for ensuring that compliance training is reviewed and updated as necessary for all DJs/presenters and producers.

- 4.5 It is a licence requirement that a licensee must ensure that all programming on its service (broadcast at any time of the day or night) complies with Ofcom's codes and rules (e.g., Ofcom's Broadcasting Code, which sets requirements on standards to be observed in programme content for the protection of the public). Set out in detail below the systems the applicant intends to have in place to ensure it will be able to comply with the codes and rules at all times while the service is broadcasting, in particular when the service is broadcasting live content but also when pre-recorded material⁴ is being broadcast.

⁴ This could include, for example, material obtained from, or streamed from, third-party sources as well as content produced by the licensee.

The youth training programme we delivered prior to the pandemic, and that we are seeking to restore, included a section on compliance and The Ofcom Broadcasting Code.

New volunteer DJs/presenters receive compliance training as part of their induction and the Station Manager requires them to pre-record shows and interviews until they have built up enough experience to move to live shows and live interviews. The Station Manager reviews pre-recorded content during this period of experience building.

The Station Manager reviews content across the schedule on a regular basis to ensure that it meets the requirements of the Broadcasting Code. Any breaches are dealt with by re-training the offending DJ/presenter and delivering updated training to all DJs.

Any DJs/presenters who are unsure whether content they plan to broadcast meets the requirements of The Ofcom Broadcasting Code, can quickly check with the Station Manager via the What's App group. DJs are also encouraged to access the codes online whether they are unsure, prior to broadcasting their own content or that of their guests.

DJs interviewing guests live are required to ensure that their guest ensures that their content meets The Ofcom Broadcasting Code. DJs are required to ask live guests to sign an agreement to say that this is the case.

All pre-recorded content is produced by DJs who have received compliance training.

- 4.6 Please set out how you will ensure compliance with your Key Commitments, including how you will maintain up-to-date information on how these are being delivered.

All new volunteers are required to become familiar with the station's Key Commitments and to commit to delivering them and the aims and objectives set out within Legacy901 CIC's Articles of Association.

The freelancer is responsible for seeking funding for, and managing, community projects that help the station to meet its Key Commitments which are to:

Facilitate discussion and the expression of opinion.

Provide (whether by means of programmes included in the service or otherwise) of education or training to individuals not employed by the person providing the service.

Promote better understanding of the particular community and the strengthening of links within it.

Additionally, the station commits to:

Provide opportunities for members of the target community to contribute to the operation and management of the service.

Provide mechanisms to ensure it is accountable to its target community.

The freelancer reports to the Station Manager who reviews on a regular basis, compliance with off-air social benefit activities and monitors their delivery and social impact.

The Director Board has ultimate responsibility for how well the station meets its Key Commitments and they regularly review the progress of off-air social benefit activities, using learning from these activities to set targets and goals for future activities.

4.7 What language(s) does the applicant intend to broadcast in?

The station broadcasts in English.

4.8 For each language listed in response to question 4.7, please provide details of how many compliance team member(s) are fluent in each language and will be responsible for ensuring that content broadcast in that language complies with the Ofcom's code and rules.

Please do not give names of individual members of staff.

All DJs/presenters are fluent in English, as are the Director Board, other volunteers, and any paid contractors or freelancers.

5. Declaration

About this section

This form must be submitted by the applicant named in response to question 2.2. An agent may not sign **the form**.

The person authorised to make the declaration on behalf of the applicant must print their name and must be one of the following:

- A director of the company or the company secretary where the applicant is a company.
- A designated member where the applicant is a Limited Liability Partnership.

The declaration must also be dated.

- 5.1 I hereby apply to Ofcom for the grant of a licence for the community digital sound programme service described above and declare that the information given in this application form is, to the best of my knowledge and belief, correct.
- 5.2 I further declare and warrant:
- a) that I am not a disqualified person within the meaning of that expression as defined in Part II of Schedule 2 to the Broadcasting Act 1990, as amended, or as a result of a disqualification order under Section 145 of the Broadcasting Act 1996;
 - b) that having made all reasonable enquiries neither the applicant nor any person controlling the applicant, as a result of the grant to me of the licence, breach any requirement of Schedule 14 to the Communications Act 2003 with regard to the accumulation of interests in broadcasting services or to the restrictions on cross-media interests; and
 - c) that the applicant is not disqualified by virtue of the provisions of section 143 (5) of the Broadcasting Act 1996 in relation to political objects and the provisions of section 144 (3) of the Broadcasting Act 1996 in relation to the provision of false information or through the withholding of information with the intention of misleading Ofcom; and
 - d) that no director or person concerned directly or indirectly in the management of the applicant is subject to a disqualification order as defined by section 145 (1) of the Broadcasting Act 1996.
- 5.3 I understand that Ofcom reserves the right to revoke the licence (if granted) if at any time any material statement made to Ofcom is found to be false and to have been by the applicant or any member or officer thereof knowing it to be false. I also understand that under sections 144 and 145 of the Broadcasting Act 1996, the provision of false information could incur a criminal conviction and a disqualification from the holding of a Broadcasting Act licence. I further certify that, to the best of my knowledge, any matters which might influence Ofcom's judgement as to whether the directors and any other individuals and/or bodies

corporate with substantial involvement in this application are fit and proper persons to participate in a radio licence, have been made known to Ofcom.

Full name (BLOCK CAPITALS) of the applicant or person authorised to make the application of behalf of the applicant:

DAWNE BOWES

Date of application:

18/01/2024

I am authorised to make this application on behalf of the applicant in my capacity as (**delete as appropriate**):

Company director

You now need to complete the confidential section (Part B) of the application form