
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):

Spirit of Plymouth (Radio) Ltd

Proposed service name:

Cross Rhythms Plymouth

Radio multiplex service(s) on which the proposed C-DSP service is to be provided (note this must be a small-scale multiplex area either previously advertised or currently being advertised by Ofcom as shown in the multiplex licence advertisement)

Plymouth

Public contact details (i.e. Contact name and/or company name, company address, telephone number(s) and email):

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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 typically be published by Ofcom in our Monthly Radio Update publication the month following the submission of your application. This may take longer if the application is received late in the month. 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, new applications, 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 properness 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):

Spirit of Plymouth (Radio) Ltd

2.2 Company registration number stated on Companies House:

05933899

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:

28 Old Park Road,
Plymouth PL3 4PY

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

YES

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	David Simpson
Job title	Station Manager
Address	28 Old Park Road Plymouth PL3 4PY
Telephone	01752 225623
Mobile phone	07792 398520
Email	dave@crplymouth.co.uk

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

<https://www.crossrhythms.co.uk/plymouth>

- 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.

Spirit of Plymouth (Radio) Limited is both a company and registered charity (charity number 1117215) and has been running the FM licensed station Cross Rhythms Plymouth since 2007. We have funded the station year on year, through a combination of regular donations from our supporters, fundraising events, on air advertising and grant funding.

We will be funding the DAB service through the same means and will likely be able to raise more revenue due to being on a digital multiplex.

No funding will come from political organisations though as a Christian community radio station we are likely to receive some funds from local churches and Christian grant making trusts who support our work.

Ownership and control of the company which will hold the licence

Details of officers, participants and shareholders of the applicant

- 2.8 Complete the following table, expanding it if necessary, to provide the following details for each director or designated member of the applicant (i.e. the body corporate that will hold the licence):

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Chris Cole	Cornerstone House, 28 Old Park Road Peverell, Plymouth, Devon, PL3 4PY	England	Director of Cross Rhythms (broadcasting charity) Trustee of Alive in the Spirit charity (Christian charity) Trustee of The Angel Foundation (Christian charity); Trustee of The Christian Broadcasting Council of the United Kingdom (Christian Charity) Director of Gilead Foundations Charity (rehabilitation charity) Director of Christian Broadcasting Corporation Ltd. – (publishing)	Partner at Cornerstone Vision - Publishing

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

Julie Suzanne Barlow	Cornerstone House, 28 Old Park Road Peverell, Plymouth, Devon, PL3 4PY	England	None	Retired

- 2.9 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 applicant (“participants”). 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.

Full name of >5% participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
N/A				
Comments				

- 2.10 Complete the following table, expanding if necessary, to identify any entities with which the applicant is affiliated. By affiliated, we mean companies that are related through ownership, either with one company being a minority shareholder in the other, or through multiple companies being owned by a third party.

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

Full name of the entity	Address
N/A	

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

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

Full name of entity	Address	Affiliates
N/A		

Details of persons who control the applicant

- 2.12 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:

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

Full name of individual or body	Address	Affiliates
N/A		

- 2.13 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 2.12, and any affiliates of those bodies. An “officership” refers to being a director of a body corporate, designated member of a limited liability partnership, or member of the governing body of an unincorporated association:

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

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

- 2.14 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 2.12, and their affiliates:

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

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

- 2.15 In relation to each body corporate identified in response to question 2.12, 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 (i.e. "participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 2.12. 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.

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

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				

Involvement of the applicant in specified activities

- 2.16 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	YES	Spirit of Plymouth (Radio) Ltd is registered as a Christian Charity
An individual who is an officer of a body falling within (b) or (c);	YES	Chris Cole Trustee of Alive in the Spirit charity (Christian charity) Trustee of The Angel Foundation (Christian charity); Trustee of The Christian Broadcasting Council of the United Kingdom (Christian Charity) Director of Cross Rhythms (Christian broadcasting charity) Director of Christian Broadcasting Corporation Ltd. –(Christian publishing)

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.

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

- 2.17 Is the applicant (i.e. the body corporate that will hold the licence) a current licensee of Ofcom?

Yes

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

Licence number	Name of multiplex
CR000059	Cross Rhythms Plymouth FM Licence 96.3, originally granted in 2007 and renewed every five years. Most recent renewal March 2022

- 2.18 Has the applicant (i.e. the body corporate that will hold the licence) held an Ofcom broadcasting licence before?

Yes

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

Licence number	Name of service or multiplex
CR000059	Cross Rhythms Plymouth FM Licence 96.3, originally granted in 2007 and renewed every five years. Most recent renewal March 2022

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

Yes, Chris Cole, Trustee and Director & Julie Barlow, Trustee and Director

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
2007-Present Chris Cole 2020 to Present Julie Barlow	CR000059	Cross Rhythms Plymouth
2006-Present Chris Cole Only	CR000003B A/3	Cross Rhythms City Radio

- 2.20 Does the applicant (i.e. the body corporate that will hold the licence) control an existing Ofcom licensee?

Yes

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

Licence number	Name of service or multiplex
CR000059	Cross Rhythms Plymouth FM Licence 96.3, originally granted in 2007 and renewed every five years. Most recent renewal March 2022

- 2.21 Is the applicant (i.e. the body corporate that will hold the licence) 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

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

Licence number	Name of service or multiplex

- 2.22 Has the applicant – or any person(s) controlling 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

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

Licence number	Name of service or multiplex

- 2.23 Is the applicant – or any person(s) controlling 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

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

- 2.24 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

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

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

No

If yes, please provide the following details:

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

- 2.26 Please provide any further information you hold, relating to the past conduct of the applicant or those individuals listed, in regulatory matters or in matters going to honesty and/or compliance, which may be relevant to Ofcom’s consideration of whether or not the applicant is fit and proper to hold a broadcast 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”.

The applicant has had an exemplary record delivering Cross Rhythms Plymouth licensed on 96.3FM in Plymouth since 2007.

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. Holders of an existing analogue community radio licence to be a simulcast on the proposed C-DSP service can replicate the existing analogue key commitments as it is our expectation that the key commitments for simulcast services are to be in keeping with one another. 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. **The information provided in this section is also the basis on which decisions are made.**

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?

Cross Rhythms Plymouth

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.

Plymouth

- 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

28 Old Park Road
Plymouth
PL3 4PY

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

We will simulcast with Cross Rhythm Plymouth CR000059

- 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.**

Cross Rhythms Plymouth's target community is Christians and those interested in the Christian faith in the Plymouth area including surrounding towns and villages. According to the 2021 Census 42.5% of people in Plymouth identified as Christian so our target community is wide.

The station's philosophy is to provide positive and uplifting content to encourage listeners.

We provide contemporary Christian music and information about relevant Christian organisations and issues, including local stories and local events.

The station also provides a platform for community groups, charities and organisations who are operating for the general good of the community in Plymouth to be interviewed about their services which helps listeners to engage with these services. The organisations interviewed include a mix of Christian and non-Christian organisations.

These interviews and other aspects of local information broadcast by the station are not served by other local media.

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.

- 3.6 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.**

We are a registered charity and have to act within the laws of the Charity Commission, to whom we send annual reports including accounts prepared by our accountants that demonstrate we remain not for profit. We are a not for profit limited company whose articles state that it cannot be run for profit. Any surplus revenue will be held in the company for use to secure the future sustainability and to be used on any required equipment upgrades or future running costs.

- 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.**

We will be providing local Christian music and local content and information which isn't delivered elsewhere.

Part of this is through our "Community Matters" programmes, offering a platform to local charities and organisations to share their work.

Radio in its self is known to help those who are lonely and our Christian based, uplifting stories and testimonies can help those who are suffering with their mental health as well and we have had feedback from listeners to confirm this.

The main output will come from volunteers who are receiving training and gaining valuable media experience in how to produce and present regular radio programmes.

We are going to be working with a local school which helps those with educational difficulties to gain their Arts accreditation through a specialist programme linked to broadcasting. It should improve their confidence and social skills whilst re-engaging with the disengaged by offering alternative learning experiences.

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

We are very approachable as a station, not only can we be reached by phone, and email, but now we have the different social media channels which we monitor and respond to and welcome comment.

We feature regular interviews with leading people in the community and discuss a broad range of subjects especially relevant to our target community.

Having a lot of content, which is interview based, with a wide range of guests, facilitates good discussion on the subjects raised.

- 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**.

Over the years we have had many local volunteers who get involved with all aspects of the station. Currently we have around 16 volunteers providing a mix of hours, some providing the technical behind the scenes and some as presenters.

In all cases they are given induction training covering Health & Safety, Safe Guarding, and the OFCOM Broadcasting Code, with the presenters getting a more in depth one to one training on their responsibilities.

We are just starting up a programme with a local school as part of their Arts Award and this will introduce the students to the world of broadcasting.

- 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**.

With over 15 years of working in the community we believe that we are able to understand our community and our links in key organisations and community groups keeps us up to date with issues in the community that we then feature in various programmes including "Community Matters" to help and support our listeners.

We are members of the local Churches Together group which enables us to form links with the wider Christian community locally and we invite guests from right across the local Christian community to be interview or be involved in the station.

- 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.**

As a station for many years we have prioritised the “Community Matters” programme to give a space for local charities and members of the third sector to share about their work. We have strong connections to many of these local charities and over the years have gained a lot of knowledge about social gain activities.

Some years ago we worked with the local YMCA to give some of their young people broadcasting experience as part of a wider social gain project called Ghana Link in which they learnt about life for young people in Ghana and developed as individuals through learning about a different culture.

Chris Cole, one of the directors and trustees, has many years of experience working with a local rehabilitation charity and so has significant experience in social gain activities for individuals most in need.

The station manager worked previously in a secondary school in the Special Educational Needs department and our main technical volunteer works for a local school for young people who are not in mainstream education.

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.**

As an existing community radio station we have built strong links with the local community and now also with local schools. Our current station is made up of members of the community volunteering to run the station. We have a community team of 16 volunteers and we are due to increase that number in the next six months.

These volunteers play vital roles in all aspects of the station including presenting, technical support, production and social media content. This will continue for the proposed digital service.

Accountability

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

We can be reached by the contact page on our website, our published email address and phone number, plus via Facebook, Messenger and Twitter.

We also intend to branch out onto further social media platforms in the future.

- 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 maintain an open door policy to allow members of our target community to talk through and voice their suggestions or criticisms. All such contacts are recorded and then are discussed in the Trustees meeting with the Station Manager.

The Station manager will discuss the issues or suggestions with the member of the community and it will be acted on as is appropriate.

Draft Key Commitments

Below is an example of the licence annex where the Key Commitments appear. Should a licence be awarded, the entries you provide below will form the Key Commitments section of your licence. Holders of a community radio analogue licence that is to be simulcast, or a corresponding service, are expected to provide key commitments that are in line with their existing service(s). As such, applicants may refer to the existing key commitments of the relevant simulcast or corresponding service(s) to ensure that the draft below is in line with those of the existing service(s).

Please provide entries where specified in **BOLD** below. The information you enter here should reflect your answers to Sections 3 and 4 of the Part A of your completed Application Form. This will form the basis of your Key Commitments alongside the mandatory text in italics. Do not amend the text in italics as 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.

ANNEX TO LICENCE

LICENSED SERVICE NO tbc

Licensed Service	Transmission Schedule Service	Transmission Schedule	Multiplex
Cross Rhythms Plymouth	Cross Rhythms Plymouth is for the Christian community in Plymouth. It provides a focal point for the Christian community but is inclusive of the wider community. It provides contemporary Christian music and information about relevant organisations and issues, including news and local information. The service broadcasts: • Music. The main types of music broadcast over the course of each week are: Christian music from a variety of genres.	Currently broadcast-ing. The DAB Licence is for a simulcast	Plymouth

	• Speech. The main types of speech output broadcast over the course of each week are: news, interviews, audience interaction, topical features, public service announcements, weather and travel information. • The service provides original output1 for a minimum of six hours per weekday and two hours per day at weekends in the daytime. • The service provides locally-produced output2 for a minimum of six hours per weekday and two hours per day at weekends in the daytime. The studio is located within the licensed coverage area. The service provides a range of community benefits (social gain objectives mandated by statute) for the target community, both on-air and off-air, and in doing so, achieves 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 contribute to the operation and management of the service. The service has mechanisms in place to ensure it is accountable to its target community.		
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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 Please give details of all compliance training (including dates) the person named in response to either question 2.3 or 2.5 in Part B (i.e. the individual who holds overall responsibility for compliance of the service) has received in the relevant codes and rules (for example, those referred to in the box at the start of this section).

The current Station Manager was originally trained on a one to one basis by his predecessor. In addition he went and had training from our Cross Rhythms City station in Stoke on Trent which has been successfully broadcasting since 2002 and has had no compliance issues.

- 4.2 Please give details of any practical compliance experience (including dates) the person named in response to either question 2.3 or 2.5 in Part B (i.e the individual who holds overall responsibility for compliance of the service) has with respect to the relevant codes and rules.

As we will be simulcasting our current FM station, the station manager David Simpson as mentioned in 4.1 has been broadcasting with full compliance for over six years and has also been managing the broadcasting team for a similar time with no instance where we failed to uphold the compliance requirements.

- 4.3 For each role within your compliance team please provide job title and a brief description of the functions of the role specific to ensuring compliance of the proposed service. Please do not give names of individual members of staff – this question relates to job roles rather than currently employed individuals.

Trustee

It is the responsibility of the Trustees to arbitrate in the event of a complaint and to ensure the Station Manager is fulfilling his role of being in charge of compliance.

Station Manager

This role is in overall control of compliance and compliance training. As a presenter they must also ensure that what they say and the interviews they conduct fit within the requirements for compliance. The station Manager will also vet all commercially produced programmes and any advertising before it will be transmitted

Presenters

Each of the presenters are trained in compliance and they must ensure that what they say and the interviews they conduct will all be compliant based on the training they have received.

- 4.4 How does the applicant intend to formally 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.

As the station has been broadcasting for over 15 years, the current team of volunteers, especially the presenters, have had one to one training with the Station Manager.

Any new volunteers will be inducted by the station manager which includes Health & Safety training, understanding the Safeguarding policy, and to understand the OFCOM Broadcasting Standards, especially the presenters.

We have never had a compliance issue in all the years we have been broadcasting so we feel the one to one training is a robust training method.

- 4.5 Will the training described in response to question 4.5 be mandatory for all staff and volunteers? If not, outline who will receive it.

Every member of the team is required to have the training and they must sign an agreement when they have been inducted fully which includes the compliance training.

4.6 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).

- a) 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 when the service is broadcasting live content. Your response should include details of what you will do to prepare presenters and guests pre-broadcast and the process for ensuring that any non-complaint content is dealt with swiftly during the broadcast.

Our process starts with the training of the volunteer team so they know what is involved to be compliant and to fulfil the regulations. The presenters get additional one to one training from the station manager.

We do not tend to broadcast interviews live as the programme time rarely fits the guest or presenter, so they are pre-recorded and then edited to fit into the live programme and therefore any noncompliance would be edited out.

A live interview would tend to be on key programmes like the afternoon show which is presented by the more senior and experienced presenters. They would sit in advance with the interviewee and ensure they understood the parameters that are acceptable during the interview.

Any non-compliant content that did occur on a live broadcast would be dealt with swiftly in a relevant way and logged as to the event and how it was dealt with. This would then be reported to the trustees. For example if inappropriate language was used an apology would be immediately issued by the presenter and the event time and detail would be logged and submitted to the trustees. If this compliance issue was by a guest they would be informed and likely not invited back for future interviews. If it took place by a member of the team then the Station Manager would discuss their future involvement with the trustees and depending upon the severity of the compliance breach they may be removed from their role.

- b) Set out in detail below how the applicant intends to ensure that pre-recorded material will comply with Ofcom's codes and rules. Pre-recorded content could include, for example, material obtained from, or streamed from, third party sources as well as content produced by the licensee.

We do not transmit any pre-recorded material from any source that has not been checked for the quality of the content and the level of compliance.

Those who check the material have been fully trained in compliance.

- 4.7 Please set out how you will ensure ongoing compliance with your Key Commitments that relate to what you will broadcast on the station, including how you will monitor that these are being delivered e.g. who will be responsible for monitoring this, how often will they monitor it, how you ensure this information is published.

It is first and foremost the responsibility of the Station Manager to monitor the compliance of all output from the station.

Any noncompliance would be reported on and brought to the Trustees to assess and make a determination.

- 4.8 Please set out how you will ensure ongoing compliance with your Key Commitments that relate to the station's off-air social gain activities, including how you will monitor that these are being delivered e.g. who will be responsible for monitoring this, how often will they monitor it, how you ensure this information is published.

The format we use is that the Station Manager determines the potential benefit and outcome of a social activity and then is either directly involved in the delivery of the activity or will monitor it through the process.

As an example, the work we will be doing with a local school, starting in the first term of this year, will include an induction for the students, incorporating training on what is involved in the radio and the radio standards as set out by OFCOM.

There will be a termly review and then a report to complete the project.

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

English

- 4.10 For each language listed in response to question 4.9 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.

N/A

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 influ-

ence 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:

CHRIS COLE

Date of application:

07/02/2023

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

company director

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