
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):

South Devon Radio DAB Ltd

Proposed service name:

South Devon Radio

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)

Torbay

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 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):

South Devon Radio DAB Ltd

2.2 Company registration number stated on Companies House:

14404678

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

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	Julian Sharp
Job title	Director
Address	Unit 3, Marble Court Business Park Lymington Road Torquay TQ1 4FB
Telephone	01803 322699
Mobile phone	07748 770055
Email	doc@radiojingles.com

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

www.southdevonradio.org

- 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.

South Devon Radio has been operating online since 2016. Our mission is to offer a station that aims at Torbay's 'more mature' demographic (generally over 50s), which is presently under-served, and to get local people more engaged with music, theatre and live performance of all kinds around South Devon.

We have recently incorporated, in order to extend our reach when the Torbay SsDab multiplex becomes available. We are financially stable, based on a strategy of keeping costs low and enjoying facilities gifted by our partners.

This means that the cash costs of maintaining the service are both modest and affordable. Any surplus funds go towards extending opportunities for volunteers.

We raise funds through:

- donations from local businesses
- modest membership subscriptions
- advertising, sponsorship and promotions: on-air, online and at events

We hold sufficient funds to cover operating costs for at least then next two years, including estimated costs of broadcasting on the Torbay SsDab multiplex, including music royalty licensing fees. With a greater audience expected through such transmission, we anticipate being able to increase our revenue streams. In addition to the two-year buffer, we will set aside a proportion of any surpluses as a contingency fund against any future downturn.

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
Julian Sharp	Unit 3, Marble Court Business Park, Lymington Road, Torquay TQ1 4FB	UK	Director; Radio Jingles	Managing Director, Radio Jingles

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

Derek Sharp	Unit 3, Marble Court Business Park, Lymington Road, Torquay TQ1 4FB	UK	Director; Radio Jingles	Managing Director, Alpine Lodge RCH
Denise Hulme	Unit 3, Marble Court Business Park, Lymington Road, Torquay TQ1 4FB	UK		Producer, Radio Jingles

- 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
Radio Jingles Ltd	70	70	70	70
Community Group A	10	10	10	10
Music Club B	10	10	10	10
Denise	10	10	10	10
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
Radio Jingles Ltd	Unit 3, Marble Court Business Park, Lymington Road, Torquay TQ1 4FB

- 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
Derek Sharp	Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB	Julian Sharp Denise Hulme

- 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
Julian Sharp	Radio Jingles Ltd; TorDab Ltd	None
Derek Sharp	Radio Jingles Ltd; TorDab Ltd; Brands Media Ltd; Alpine Lodge RCH Ltd, Alpine Lodge Trading Limited	None

- 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	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

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

No

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

Licence number	Name of multiplex
N/A	

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

No

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

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.

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

No

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		

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

No

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

Licence number	Name of service or multiplex
N/A	

- 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
N/A	

- 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
N/A	

- 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
N/A		

- 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

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

- 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
N/A		

- 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".

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. 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?

South Devon Radio

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.

Torbay

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

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.

Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB

- 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.

N/A

- 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.**

South Devon Radio is a station for the maturer audience in South Devon (meaning Torbay, South Hams and southern parts of Teignbridge).

We play music and provide conversation and information for this area, generally for people over 50.

We aim to bring music lovers of a certain age together, on air, online and sometimes in person, and to discuss music, theatre and live performance of all kinds in the area. We also cover music and event information for the wider Devon community.

We aim at over 50s because the volunteers who run the service are generally over this age, and to cover a clear gap in the local radio market in the area. It is a growing demographic in South Devon.

Torbay Council estimates that a third (32%) of the population – 45,000 people - will be aged over 65 by 2030, compared with 22% across England. And the area will become progressively older too. Torbay's total population is expected to grow 6.5% in the decade to 2030, again higher than the England average, with the majority of the increase being people over 60. They are not well served by local radio stations.

Whilst both the Torbay polygon and South Devon Radio cover a broader area than Torbay alone, the ageing population profile is reflected in the South Hams too (a quarter of residents are over 65).

Our music profile is skewed toward this audience, with tracks mainly from the 1950s to 1980s, with specialist features covering older 'crooners' and jazz.

Whilst not discriminating on the basis of age – indeed actively welcoming volunteer applications from younger people who share our passion for South Devon - our presenters generally come from the maturer end of the scale. Our volunteers include former professional broadcasters and less experienced people who want to engage positively with everything South Devon has to offer.

Through their participation, we provide a social network:

- For our volunteers, who can develop new skills among likeminded people
- For our listeners, who can interact with our programmes

As being well-informed about music from days gone by, our speech content features what's on, local news and sport, charity and community interviews or messages, and interviews. We are interested in music of all kinds for the over 50s (recognising that they do not want exclusively dated material, and don't like to be thought of as 'oldies') and support arts activities throughout the area.

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.**

All revenues raised from the service will be used to fund operating costs, capital expenditure and establishing a rainy-day fund. We will invest in training our volunteers to develop a range of new skills, including broadcasting techniques, production and compliance awareness.

We will have an oversight committee to manage the station's finances. This group will have a specific brief to ensure the financial stability of South Devon Radio. As a private company without share capital, no profits will be distributed as dividends. Surpluses will be explicitly used for the enhancement of the station, particularly in targeting more hard-to-reach sectors of our generally older audience.

Our aim is to gradually become more visible within the South Devon area, within the resources we have. Our volunteers already attend many music events to cover on air – and some are musicians themselves. But we will use any surpluses to invest in promotional materials and branding so we are seen at events, with the hope that musicians and performers will use South Devon Radio to promote their gigs, increase our listening and audience engagement – and develop a virtuous circle; we support performers, performers support us, and we all benefit. We may also develop our own events, which as well as developing content and building our community brand, should raise funds for the station.

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.**

Whilst South Devon's population skews older, they are not necessarily well-served by local radio stations. There is an excellent online service for young people, and also a general something-for-everyone community station, but nothing that aims particularly for the over 50s that unites them by both a love of older pop music (and a bit before) and the fantastic South Devon area in which we live.

Whilst to-date we have relied upon a core base of around 15 volunteers, the opportunity afforded by the forthcoming Torbay small-scale DAB multiplex means we will be able to reach a larger number of local people. Our volunteers have already benefitted from training and experience in presentation, production, interviewing skills, IT skills, writing skills and interacting with outside groups to gather content. We will invite more people to get involved, providing opportunities for social engagement based around shared loves (music from the 1950s onwards and good conversation) and developing new skills.

We are well-connected with the local music scene, and will invite more bands and singers to promote their work. We already provide a what's on service for local gigs, on our website and on South Devon Radio's online service.

In short, the community/social gain benefits will be:

- A predominantly 'older music' service, supported by news, conversation and information for the over 50s in South Devon, a community which is presently under-served by local radio, but which is a growing demographic, particularly in Torbay and the South Hams.
- Volunteering opportunities, especially for this age group, based on shared loves (classic music/South Devon)
- Training opportunities, in skills including production, publicity, administration, and community engagement
- A new outlet for South Devon groups to get their stories – and coverage of events - on air to the maturer audience
- Providing music and live performance promotion to performers and venues, specifically for South Devon. We aim to be the hub where anyone involved in music, events, theatre and live performance can use us to promote their work; and where if you have a love of live music, or vintage pop, you feel welcomed as part of the South Devon Radio team.

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

As well as inviting interaction with our output in the usual ways - texts, emails, phone calls – we will have regular interviews with people in South Devon making the news, influencing the area or whom simply have something interesting to say, especially if it is about music, theatre, events or live performance.

Through interviews, we will showcase local talent and performers coming to our local theatres (which includes Devon's largest receiving theatre), inviting listeners to ask questions or put their points. Where possible, we will broadcast or gather content from community events.

We will highlight topics of interest to or impacting on South Devon, such as any revised application to be part of a City of Culture (despite not being a city), and the regeneration of Torquay and Paignton, which has been a long time coming.

For people who want to comment about South Devon Radio as a service, rather than any specific on-air content, we have a feedback form on our website, and will respond to comments and complaints in a timely manner.

- 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.**

With the South Devon Radio studio being less than a mile from the centre of Torquay, on a bus route, and a five-minute walk from the nearest railway station, Torre, we are geographically easy for the community to access.

We are welcoming and inclusive too – and by sharing a love of music and live performance, we informally impart a depth of musical and performance knowledge between our members.

Some of our volunteers are former broadcast professionals, either in front of or behind the microphone. They have already trained volunteers in all aspects of radio presentation and production, and through our move from online to small-scale digital broadcasting across South Devon, we hope to encourage more people to become involved.

To manage what we expect to be increased interest in participating, we will introduce train-the-trainer sessions so high standards can cascade through our volunteering body.

Being housed in the same building as Radio Jingles, a successful commercial production and music company, we share expertise in music production and recording with our volunteers, together with an understanding of compliance issues, particularly around the BCAP Code, and Broadcast Code.

We have induction sessions for volunteers, not just so they are aware of our target audience, our values and ethics, but also so they understand the importance of compliance. A member of the South Devon Radio board is responsible for the compliance awareness section of this training.

We also encourage our volunteers to take advantage of radio training events in the area, such as the south west branch of the Radio Academy and its free online resources (as well as those on the BBC, BCAP and Radio Academy's websites).

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.**

Our current volunteers are well-connected in the South Devon music scene; not just attending many live performances, but often performing themselves. Through our personal networks, we share stories and news of events about the local performance scene in our output. However, we are necessarily limited at the moment by being an online service in a crowded space.

The forthcoming Torbay multiplex will provide a higher profile, enabling us to encourage more volunteers, which in turn extends our network.

We are a leading participant in TorDab, which is applying to run the Torbay multiplex and we are deeply connected with community groups. We will develop regular contact with Torbay Community Development Trust, which represents more than 100 voluntary groups, Torbay Development Agency, Torbay Business Forum and Torbay Council and invite their networks, particularly the over 50s, the socially isolated and the otherwise hard-to-reach, to get involved, as listeners, volunteers or contributors.

With more participation, we will be able to make our on-air listings more thorough and populate our website with more information for over 50s in South Devon who are interested in the news and information for the area in general and in music, theatre, performance and local events in particular.

- 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.**

We have trained many people on work experience and employed apprentices, training them in all aspects of radio production, voice over techniques and creative writing.

Over the years since we launched South Devon Radio online, many of our presenters have been former commercial radio hosts. We nevertheless take them through our compliance training briefing, and we train them in the technical aspects of producing their shows.

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.**

We are always on the lookout for people to become involved in South Devon Radio. As our target audience is people over 50 who share a passion for music and live performance, we often meet people in that sector and, where we believe there is a spark of interest, invite them to the station.

We have a 'get involved' page on our website, which has a form so that people can get in touch; and we have a trail in our programming inviting people to become volunteers too.

We are introducing an annual volunteers' event/public meeting, which as well as a way of getting feedback about the service, is a forum for people to outline their interests and areas of knowledge or expertise and get more involved in the running of the station.

South Devon Radio will provide a platform for our target age group of over 50s to improve their confidence, meet new friends, develop social networks and learn new skills.

Accountability

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

As outlined in some of the responses above, we:

- Have a 'get involved' section of our website and similar messages on air
- Invite contributions by text, phone, online message, email and even post
- Will introduce an annual volunteers' event/ public meeting
- Be accessible geographically, with a studio near to central Torquay, with a generally open-door policy – subject to normal security measures – in office hours
- Will be out and about as a station or as individual volunteers, especially at music and performance events in South Devon, where we will engage informally with potential and actual listeners; receiving their feedback and, where appropriate, inviting them on air.

- 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 review all correspondence and respond in a timely manner.

Serious complaints or compliance issues will be escalated to a board member, who will acknowledge receipt quickly and then commit to a meaningful reply within 10 working days.

We will keep a complaints log, which as well as a summary of the issue will note our response.

Suggestions about the service will be considered by a board member, who will acknowledge receipt quickly and then commit to a meaningful reply within a month. We will endeavour to introduce suggested service improvements where resources allow, where volunteers have appropriate knowledge, interest or expertise, or where we can recruit.

We encourage presenters to ask listeners for comments and suggestions. Significant ones will be discussed and responded to by the board.

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	Service Description	Transmission Schedule	Multiplex
South Devon Radio	South Devon Radio <i>is a radio service intended to serve</i> NOTE: The next 3 headings below are the components of the 'character of service'. People over the age of 50 in South Devon, particularly those with a passion for vintage music. <ENTER A DESCRIPTION OF THE LOCALITY> South Devon – meaning Torbay, Teignbridge and the South Hams.		Torbay

	<ENTER A BRIEF STATEMENT OF MAIN PURPOSE OF THE RADIO SERVICE, ITS FUNCTIONS/ACTIVITIES describe in no more than 50 words> Providing vintage music shows produced by people generally over 50 in South Devon, which has a growing older population currently underserved by local radio. We champion 'older' music (90 per cent of our music output) and promote local events and performances; celebrate what is good about South Devon. <i>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).</i> <i>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:</i> • <i>the facilitation of discussion and the expression of opinion,</i> • <i>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</i> • <i>the better understanding of the particular community and the strengthening of links within it.</i> <i>Members of the target community shall contribute to the operation and management of the service.</i>		
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	<i>The service shall have mechanisms in place to ensure it is accountable to its target community in the specific area or locality.</i>		
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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 principals of the station have had long experience in commercial radio production services, and are fully conversant with the BCAP Code and Broadcast Code. Our volunteer team includes experienced broadcast professionals who are equally knowledgeable about compliance.

We regularly review Ofcom's broadcast bulletins to keep abreast of case studies. We share many of the lessons with our volunteers.

We do not use premium phone lines.

- 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.

Our practical compliance experience largely comes through 20 years of providing commercial production services to commercial radio stations in the UK. As well as being fully conversant with the BCAP Code, and Section 10 of the Broadcast Code, we are fully conversant with copyright and royalty regulations.

Although only online to date, we have always adhered to the standards of the Broadcast Code in its entirety. Our principals hold induction sessions with new volunteers, which includes awareness training.

As participants in an application for the Torbay small-scale multiplex, we are part of a team including a newspaper publishing group, Clear Sky, and commercial radio station Radio Exe, and hence have access to partners who are also well-versed in broadcast and advertising compliance, and in broader media law.

- 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.

A member of our board who acts as programme manager has overall responsibility for compliance. This role encompasses compliance awareness training at inductions, regular briefings on compliance at programming team meetings, and distributing relevant compliance case studies from Ofcom's Broadcast Code and the ASA's fortnightly bulletin. The role involves regular output monitoring, and feedback sessions with on-air volunteers.

We have detailed on-air presenter guidelines, which heavily reference compliance issues.

The IT manager is responsible for the logger, ensuring we keep recordings for at least 42 days.

Our compliance process is outlined in a document attached to this application.

- 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.

Our volunteer induction programme includes general compliance awareness.

Our on-air guide provides summary details of the main codes.

We provide links to the BCAP Code and Broadcast Code to all volunteers when they join us. We encourage them to read Ofcom's Broadcast Bulletins and the ASA Published Rulings.

We have regular volunteer meetings, during which we emphasise our values, aims, our target audience, and, should we be awarded a C-DSP licence, the importance of compliance as a now-regulated, licensed broadcaster.

- 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.

Yes, staff and volunteers will be required to undertake compliance awareness training, and participate in group meetings in which compliance will be a regular topic.

- 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.

As outlined above, all volunteers must have undertaken compliance awareness training as part of their induction. They must sign to say they have received and read our on-air guidelines and that they have received links to the Broadcast Code and BCAP Code.

Our database of music has been checked for compliance.

As a music station for the over 50s, with volunteers who are of a responsible age, we do allow presenters and producers to choose much of their own music. It is a condition of on-air volunteering that all tracks must have been listened to off-air before broadcast for compliance reasons.

All new music uploaded to our database will be provided by record labels or reputable sources known to us, and will not be taken from streaming services.

We do some live interviews. We always brief guests about the nature of the interview and request that they must not swear, for example.

We make sure our presenters are aware of their obligations to spot any non-compliant content that slips through our processes; to apologise at the earliest opportunity, where appropriate, and to alert the station manager/compliance officer. In our four years as an online station, we have never had an instance where non-compliant content has been broadcast.

- 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.

South Devon Radio's general manager is responsible for ensuring we meet our key commitments as a community station. At this stage of our development, the general manager / programme manager roles are undertaken by one person, but our intention is to split that as we take on more volunteers.

We will use a software-based monitoring service, such as RadioMonitor, as a back-up to our own logger, to ensure we maintain full records of our output, and to assess the music output against our commitment of playing most music from the 1950s to the 1980s. We will keep GDPR-compliant registers of our volunteers and guests, to ensure we are getting a range of voices on air and in training. We will keep logs of how we have engaged with the community of over-50s in South Devon and helped strengthen links between people in the area.

- 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.

We have two regular forums; firstly, the management meeting which oversees strategy, high-level programming issues, finance and compliance, including those with our key commitments – and, secondly team meetings which involve volunteers, of which a training element is provided, as well as general background information and ideas for programming and community involvement. Our key commitments and the importance of social gain will be infused throughout our team. The station manager has overall responsibility for compliance and monitoring of our service against our commitments.

- 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.

As with 4.7 above, we will cover social gain commitments in our two regular forums; firstly, the management meeting which oversees strategy, high-level programming issues, finance and compliance, including those with our key commitments – and, secondly team meetings which involve volunteers,

Like our on-air key commitments, social gain will be infused throughout our team. We are committed to serving our core over-50s target audience, and will be at, or covering, events, across South Devon. We will involve and provide training to as many people as possible. The station manager has overall responsibility for compliance and monitoring of our off-air social gain activities against our commitments.

- 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.

All our team members and volunteers are fluent in English.

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:

JULIAN SHARP

Date of application:

20 October 2022

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

Company secretary / company director / designated member (in the case of a Limited Liability Partnership)

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