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# Community Digital Sound Programme (C-DSP) licence

## Application form – Part A (public)

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

Leicester Community Radio Broadcasting CIC

Proposed service name:

LCR1

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)

Leicester

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

Samuel Hunt

C/O: LCR, Maxxwave House, Hill Lane Business Park, Markfield, LE67 9PY

07824 364 541

sam@leicester.fm

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# Contents

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## Section

1. Overview	3
2. Applicant's details	6
3. The proposed service	16
4. Compliance of the service	23
5. Declaration	28

# 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](mailto: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](mailto: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):

Leicester Community Radio Broadcasting CIC

2.2 Company registration number stated on Companies House:

10433796

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:

Maxxwave House, Hill Lane Business Park, Markfield, Leicestershire, England, LE67 9PY

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

**Yes** (delete as appropriate)

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

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

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

Full name	[See accompanying agents letter]
Job title	
Address	
Telephone	
Mobile phone	
Email	

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

<https://www.leicester.fm/>

- 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.

Leicester Community Radio (LCR1) has held, and continues to operate, an Ofcom radio service licence. Presently we broadcast in Leicester via an LPAM on 1449, and a Low-Power FM Trial licence on 107.5FM. Prior to this we delivered a Covid-RSL for Leicester between May 2020 and September 2021. LCR1 has broadcast under various forms since the 1980s, and we have applied to Ofcom for a permanent licence on several occasions, but not been awarded anything that suits our long-term social objectives. We have, however, maintained a continuous live online streaming service since 2015, while making use of various RSLs, an LPAM service, and the Low-Power FM trials. While these services have enabled LCR1 to keep broadcasting, they are not suited to the designated geographic area that we wish to serve, and while SSDAB is a good solution in many ways, the present configuration of the advertised Leicester polygon does not cover the outlying parts of the Greater Leicester Urban Area (GLUA) where many of our listeners are resident.

In addition, because our objects as a CIC are specifically directed towards assisting homeless people, people who are economically insecure, supporting anti-racism solutions, and enhancing social cohesion, we are committed to providing broadcast services that operate on a low-cost basis. Our social objectives are to provide additional social benefit to listeners and volunteers in the GLUA, which needs to be supported by a media dissemination and broadcast infrastructure that is both accessible and sustainable within the scope of our operational and revenue expectations, and those of our listeners. We place great emphasis, therefore, on services and infrastructure that are provided at low costs and *in-kind*, such as those provided by our volunteers, stakeholders and donors. If it wasn't for the generous support of our committed and enthusiastic volunteers for over three decades, we would not be capable of sustaining any kind of service.

Moreover, while we are ready to launch on any platform as soon as transmission arrangements are agreed and confirmed, we are mindful that the insecure nature of our licence status has meant that we have been unable to develop an on-air advertising and sponsorship revenue model. We have consequently sought to generate funding from a range of other non-on-air sources, such as from grant funding, event sponsorship, volunteer-led fundraising activities, donations and reciprocal support services from stakeholder organisations. However, because Leicester Community Radio Broadcasting CIC's principal objective is to serve marginalised and low-income communities in the Greater Leicester Urban Area, we are mindful that fundraising from supporters and volunteers is sporadic and at best minimal, as many people who form our core audience, and whose needs we seek to address, are economically insecure and face the challenge of living without the capacity to purchase discretionary items.



However, we have sufficient long-term and low-cost broadcast service arrangements in place to ensure that we can operate sustainably for the entire period of the SSDAB licence. This includes a strong relationship with St Peter's Community Centre, who are providing a dedicated and independent space for our studios. Our relationship with St Peter's Community Centre is based on a services *in-kind* arrangement, but is operated separately and independently from St Peter's Church. The trusted relationship we have established means that we are developing additional funding streams from training, social engagement, and public health awareness work. The location of our studio at St Peter's Community Centre puts us within walking distance from Leicester city centre, ensuring we are accessible to members of the public who may wish to volunteer.

Furthermore, we anticipate that ongoing limitations on fundraising will be exacerbated during the present 'cost-of-living' squeeze. The directors of Leicester Community Radio Broadcasting CIC are mindful, therefore, that an economically restricted broadcast platform, such as SSDAB, is not ideal for our purposes, as many of our listeners are unable to afford, purchase or operate digital radio devices. Ofcom's own figures show that less than forty percent of the UK population access DAB radio at home. We intend, therefore, to continue to seek opportunities to meet the needs of the people we are dedicated to serve, across any low-cost media platform, and in the most economically accessible and permitted manner. This means stripping out any extraneous costs and service charges, and building on the socially reciprocal relationships that we have established as the core for our sustainability planning.

We are grateful, therefore, that Leicester Digital Partnership is offering us a route to broadcast on the Leicester polygon at no cost to LCR1 for the period of the licence. Our agreement is based on the understanding that we are able to provide a broadcast radio service that is contiguous with the Ofcom defined Community Radio statutory licence requirements, and that we will continue to meet these higher standards of social gain objectives, which include encouraging access and opportunities for participation in radio programme making by members of the public. We are committed, therefore, to ensuring that meaningful training is provided in a way that promotes learning and enhanced social engagement by our volunteers and listeners, which is in line with those expected of all Ofcom licenced Community Radio services.

We are mindful, however, that the present configuration of the Leicester polygon excludes many areas encompassed in the GLUA, and limits access by many people who form our target audience. Serving the needs of people who are resident away from Leicester city centre, where audiences are served by other community radio stations, therefore, is a challenge, but remains something we are committed to dealing with. The demographic difference between Leicester City and Leicestershire shifts from nearly sixty percent of the population being 'non-white', to only three percent being 'non-white' in Leicestershire. The restricted geographic coverage of the Leicester SSDAB polygon, we believe, will lead to the further marginalisation and exclusion of people from communities that form our intended audience, because they will not have access to our recognised broadcast service because of the limitations of the SSDAB polygon in Leicester.

## 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 <sup>1</sup>	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Samuel Hunt	Maxxwave House, Hill Lane Business Park, Markfield, LE67 9PY	UK	Maxxwave – Radio communications	Maxxwave
Des Belle	As above	UK		Leicester City Council Maintenance
Theresa Hutchinson	As above	UK		Mental Health Practitioner

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
Samuel Hunt	1	1	33.3	33.3
Des Belle	1	1	33.3	33.3
Theresa Hutchinson	1	1	33.3	33.3
Comments				

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

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

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	Yes	Desmond Belle – Employed in a non-management capacity by Leicester City Council
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; <sup>2</sup>	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	

<sup>2</sup> 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.

## 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
LRSL102380	1449 LPAM
LRSL102380	107.5 LPFM
	Holds LCR2 low power FM trial but will transfer when trial complete (no transfer clause in license and LCR2 now an independent legal entity)

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
SRSL102213	Numerous RSL licences across multiple years, such as October 2017.
SRSL103280	15-month COVID RSL service

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**

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
Approx Oct 2015-Oct 2017		Samuel Hunt – Director and Shareholder Fosse 107 – Commercial License for Hinckley and Loughborough

Approx 2001		Samuel Hunt Rugby FM
		Samuel Hunt, trading as Maxxwave Ltd provides transmission services (unconnected to LCR) to a number of community and commercial Ofcom licensees.

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)?

**Yes**

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

Licence number	Name of service or multiplex

	We applied to Ofcom to takeover the DemonFM licence before it was surrendered.

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?

**Yes**

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
SRSL103280		LCR had 2 Ofcom investigations during the COVID RSL and both were discontinued and no fault of LCR was found

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 imposed	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:



C-DSP licence: Application form (Part A)

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”.

Ofcom is aware that Leicester Community Radio (LCR) has been engaged in protracted and sometimes difficult negotiations to try to get any license that serves the area that our listeners live – the Greater Leicester Urban Area (GLUA). Unfortunately, the advertised Leicester polygon does not cover where our listeners live, and is restricted by the statutory limitations of the ‘forty-percent’ population rule. In some directions the nearest adjacent polygon is over ten miles away, so we will be unable to obtain low-cost carriage on these services to provide auxiliary coverage. However, acting on advice from Ofcom, we are applying for a C-DSP licence.

LCR1 does not wish to run a multiplex as the coverage area is unsuited to our needs, and does not provide optimal coverage of the areas in which LCR1 audience lives. In addition, we are further precluded from ownership of the Leicester multiplex provider, because of the commercial shareholding rules that affect one of our directors. LCR1 has highlighted this matter to Ofcom in our ongoing communication, specifically that we have no other legal means, for the foreseeable future, to get on air and to broadcast to our target audience. We are therefore reluctantly seeking to formalise carriage on the Leicester multiplex as a sub-optimal alternative option.

The reason that we feel SSDAB is a sub-optimal option for LCR1 is because we are established to serve the needs of people who are unserved by any other community, commercial or BBC stations. Being limited to the coverage and platform provided by the Leicester SSDAB service means, however, that many of the people who form our audience will be deprived of the opportunity to receive a service that is relevant to their identity and their needs. While other adjacent community radio services may overlap with these areas from outside of the city, originating in satellite towns in Leicestershire for example, they lack any integration with the cultural and social expectations of the audience we have identified as in greatest need.

This means that people living in both the city of Leicester, and the extended urban area, will not have the opportunity to access a community radio service that fits with their identity and social experiences. The validity of our audience profile was examined and confirmed by Ofcom as part of the checks made for our recent Covid RSL that we maintained on 107.5FM for over fifteen months. This frequency remains free in Leicester, and has a pre-cleared transmitter location, and when operated at a suitable power level, which covers the Greater Leicester Urban Area well, is better suited to our needs.

In addition, it has now become feasible to fork significant parts of the Leicester Community Radio services into two separate operational units and entities. Volunteers who support the LCR2 service have now formed Leicester Community Radio 2 Broadcasting CIC, with separate and distinctive social objectives, compliance monitoring arrangements, and independent governance. Leicester Community Radio 2 Broadcasting CIC have applied for a C-DSP licence with the purpose of catering for volunteers, audiences and communities that are highly likely to be excluded from the radio programme making process because of their physical or mental health status. We would not be able to provide this additional benefit to listeners and residents in the GLUA, had LCR not shown its long-term commitment to broadcasting a statutorily defined licenced-level service, and establishing a firm operational basis for ongoing provision of broadcast services.

Leicester Community Radio Broadcasting CIC has been unable to join Leicester Digital Partnership CIC as a shareholder, because of the relationship with Sam Hunt, who is both a director of Leicester Community Radio Broadcasting CIC and Maxxwave Ltd, a commercial provider of radio broadcast services. However, we remain fully supportive of the aims of the partnership, and have been willing to play a constructive role in supporting the establishment of the SSDAB multiplex application. By working with the Leicester Digital Partnership CIC, we gain the additional benefit of securing a strong working relationship with the existing Ofcom licenced Community Radio stations in Leicester.

We therefore intend to work closely with Leicester Digital Partnership CIC in a non-shareholding capacity, to support and promote the intended statutory social gain commitments and requirements of Ofcom licenced community radio in the UK. We are therefore fully supportive of the proposal of Leicester Digital Partnership CIC to offer CDSP+ contractual arrangements that assimilate the statutory requirement of licenced Community Radio, such as relevance to the target community, access to programme making, self-governance in operational management, and training and capacity building in community-focussed communications.

## 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?

LCR1

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.

Leicester Digital Partnership CIC

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).<sup>3</sup>

St Peters Community Centre, St Peters Road, Highfields, Leicester, LE2 1DA

<sup>3</sup> 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.

C-DSP licence: Application form (Part A)

- 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.

LCR1 LPAM/LPFM LRSL102380

- 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.**

LCR1 is a BAME-led organisation that has previously been licenced by Ofcom to provide a Covid-19 broadcast programming, and is presently broadcasting with a low-power AM licence. Up to sixty volunteers actively take part in producing programmes, and the audience reach during the Covid-19 licence period was estimated to be 20,000 listeners per week across the Greater Leicester Urban Area, a significant proportion of whom have been identified as least likely to take up the Covid-19 vaccine. Programmes are broadcast in English and were designed to engage with people who are likely to suffer distress from news overload and information burnout. LCR1 continues to provide dedicated community radio services that extend beyond the central city communities, and to reach the outer communities who are underserved by other mainstream or community broadcasters. The target audience of the station is aged thirty-five years and above, and programmes are in English, with some Caribbean dialect-based content.

In a report prepared for Leicester Community Radio by Professor Edward Cartwright of the Institute for Applied Economics and Social Value - East Midlands Economic Data Unit at De Montfort University, on 27th April 2021, the following observations are made:

Leicester is a city in the East Midlands with an estimated population of around 350,000. It is ethnically diverse: at the 2011 census 50.5% of residents identified as white, 37% as Asian (28.3% Indian), 6.2% as Black and 3.5% as mixed or multiple ethnic groups. Leicester is one of the most deprived areas in the UK with high levels of in-work poverty, income deprivation and skills deprivation. Leicester is a low-wage, low-skilled economy, characterized by a large textile and clothing manufacturing sector as well as a relatively large retail and wholesale sector. Salaries in Leicester are lower than any of the comparator cities. The Leicester population has relatively low functional and workplace skills. The proportion of people in Leicester who cannot speak English is far higher than any of the comparator cities. The proportion of people with an NVQ1 or above qualification is lower in Leicester than all but one of the comparator cities.

The English Indices of Deprivation 2019 (published by MHCLG) provide an overall picture of deprivation in areas of England as measured on income, employment, education, health, crime, barriers to housing and services, and living environment. Leicester is ranked as the 22nd most deprived local authority area in England, out of a total of 317 authorities.

Leicester is ranked as the 15th most deprived area in terms of income, 24th most deprived in terms of income affecting children, and 13th most deprived in terms of the proportion over 60 experiencing income deprivation. An estimated 20% of adults in the city experience deprivation due to low income, 24% of children are living in income deprived families, and 30% of those over 60 are income deprived.

Leicester is ranked as the 15th most deprived areas in terms of education and skills and the 7th most deprived area in terms of adult skills. Leicester is also characterized by high levels of inequality. There are areas within the city of Leicester, such as Saffron (in the south of the city), Brauntsone (in the west of the city), Beaumont Leys (in the north of the city) and Northfields (in the east of the city) associated with very high levels of overall deprivation, including in both income and adult skills.

Leicester can be classified as a low wage, low skilled economy. Levels of economic activity (76.8% of those aged 16-64) and employment (72.2%) are around average for Great Britain (79.1% and 75.4% respectively).<sup>2</sup> Indeed, the proportion of workless households (11.7%) is below the GB average (13.9%). Those in work, however, are often on low wages leading to relatively high levels of in-work poverty. Leicester is characterised by relatively low rates of formal qualification. Leicester has a lower rate than all the comparator cities except Wolverhampton. Moreover, the gap between Leicester and the average in England and Wales is large with only 76.9% of those in Leicester having qualifications of at least NVQ1 compared to 88.1% nationally.

The picture is even starker when we look at English language proficiency (although we do note that this data is from 2011 and so inevitably less reliable than other available data). Around 7.5% of residents are identified as unable to speak English well or at all. This is a very high proportion compared to the other cities in the comparator group, and well above the national average of 1.6%. Leicester is a city with unique economic challenges. It has a low wage, low skilled economy. Residents have relatively low levels of qualification and English language proficiency. There are also social problems such as over-crowded housing. Such factors undoubtedly contributed to Leicester being one of the worst hit cities during the coronavirus pandemic. Leicester currently sits 7th (out of 50) on the Centre for Cities dashboard of coronavirus impact with 9,446 cases per 100,000 population.

Given this analysis, Leicester Community Radio consequently provides dedicated broadcast and internet radio programming to residents of the Greater Leicester Urban Area. LCR1 gives a platform to volunteers to develop radio content of a social value nature, with the primary aim of facilitating and supporting public and civic messaging as relevant to low-income communities, and those in socio-economic groups D and E. The lowest take up of Covid-19 vaccines in Leicester corresponded with the LCR1 audience profile, which is why we continue to invest in links with public health bodies, charities, education providers, mutual aid groups, in order to offer a free message platform that can be used to deliver public information updates, and advice about matters of public concern and social cohesion.

- 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.**

Leicester Community Radio Broadcasting CIC is a not-for-profit incorporated company. We work closely with funders who support us on the basis we return any surplus funds to benefit the station, the volunteers and the listeners of LCR1. This is in accordance with the statutory obligations for licenced community radio stations to operate on a not-for-profit basis. In addition, LCR1 has no paid staff and volunteers and associates, including directors, take no reimbursement other than unavoidable expenses. Any surplus revenue generated is added to a contingency fund of around £5000, or is used to buy more equipment to improve the service and pay operational running costs. If a large surplus is generated, it will be redistributed to a similar organisation that will either tackle racism, mental health or help the homeless in the Greater Leicester Urban Area. In keeping with our original vision for the station to re-invest in facilities, such as updated studio and transmission equipment, we aim to provide the most accessible and cost-effective service for our community. Broadcasting on the SSDAB platform will offer an additional opportunity, if sub-optimal, to meet our listeners needs, and to provide long-term and additional benefit to the residents of the Greater Leicester Urban Area.

## 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.**



The primary beneficiary of social gain from LCR1 is the listener, both on-air through the programming, and off-air through the support we give to groups, activities and events we run. Primarily, the target audience is not served by any community, commercial or BBC station, and therefore will benefit by having a dedicated, locally based and relevant community service that caters for their needs, particularly of people over the age of thirty-five. LCR1 follows the principle of a 'generalist' station, and aims to provide programming of a mixed nature, including music and entertainment. We also offer opportunities for listeners to engage with topics and issues of concern through community-focussed discussion, expression of opinion, debates, entertainment, information about local events and services, public health and education awareness raising, documentaries, and much more.

LCR1 has three key objectives:

1: Reduce racism and improve community cohesion in the GLUA. LCR1 operates in the area with one of the highest rates of racial hate crime in the UK. LCR1 uses a number of techniques, including "normalise and demonise" against racist behaviours and work closely with UK leading anti-racism groups and organisations, many of which are based in Leicester.

2: Help unemployed people and low earners progress their careers. This is through improvement of self-esteem, education, signposting to careers, etc. LCR1 works with local charities, mutual aid groups and public authorities to facilitate public education around issues related to skills and employment development. We work on the principle that the best advocates of personal and social change are those who are similar to our audience members, who have faced and are willing to relate how they have overcome challenges of low-educational attainment and skills in the past.

3: Help homeless and housing insecure people where possible. LCR1 aims to provide information and support for people who are precariously housed and who may not have access to forms of digital support that now characterise the engagement approach of many charities and public agencies. We are committed to accessible, low-cost forms of broadcasting that people who are affected by insecure housing can rely on, both for information and for companionship. We support regular programme material that is aimed at people who are precariously housed, such as the location of food banks, places to sleep, in-person support and advice, and so on. We work closely with local charities who support homeless people, and offer promotional messaging services for people who are affected by or at risk of becoming homeless.

LCR1 has already engaged in dialogue with Ofcom indicating we may be limited in what we can do to achieve these objectives on DAB, which are further compounded with DAB+. For people who are insecurely housed, there tends to be limited access to mains electricity, and the cost of batteries for portable radios are a significant problem. This is a major short-coming with DAB, which significantly hampers our delivery of our social value aims, as the deprived groups we work with cannot afford DAB radios, especially the more expensive battery sets. We will work with Leicester Digital Partnership CIC and our partner community stations in Leicester to coordinate and highlight these issues, and will work closely with Ofcom and other public agencies to apply remedies that meet the needs of the most vulnerable members of our communities, and those in socio-economic groups D and E..

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

LCR1 seeks to actively recruit volunteers from our audience by regularly promoting messages on air about how to get involved in the work of the station. We hold regular open meetings where prospective members can come and chat with experienced volunteers, and discuss their ideas for programmes they may wish to make. We host these meetings jointly with LCR2 so that we can direct new volunteers to an appropriate service, or to other more suitable community radio stations operating in Leicester.

LCR1 regularly hosts debates and discussion programmes, and we are recognised locally for hosting outside broadcasts on topics of public concern to our listeners. This is in addition to the phone-ins, text-ins and other interactive communications functions that presenters utilise on air. We therefore encourage our listeners and local organisations to engage with us to talk about the things they do, including the initiatives and events that they are involved in. Further-more, we always aim to be proactive in contacting people who have a story to tell or something to say. We offer to promote what they are doing and encourage our listeners to get involved and let us know how they are getting on.

We also continue to showcase the work of various health, education and homelessness services, specifically real stories about real people, and we broadcast from local charity and cultural events. Our studios can be contacted directly by phone, SMS, email and social media. Our presenters invite listeners to contact us with their music requests and dedications. We have over twenty years of experience providing a service aimed at our audience, and are well able to reflect the cultural interests and identities of our audience. We will continue to actively seek contributions from members of our communities by organising additional engagement events, such as 'chatty-cafes', 'Talkaoke' sessions and street reporting vox-pop sessions with community reporters.

- 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**.

LCR1 is operated entirely by volunteers. Volunteer roles provide opportunities for members to develop technical skills and experience, build confidence and improve interpersonal skills. Some volunteers may wish to enhance their skills in management, community discussion and community-focussed communication. Our experience shows that volunteers appreciate the variety of opportunities available, often joining to undertake one role and then becoming more interested and involved in others. We appreciate, however, that a long-term, regular commitment isn't suitable for everyone, so we also offer less 'time-demanding' and project-based opportunities and even one-off activities and 'taster' sessions.

Participation in LCR1 is open to all individuals aged eighteen or over, subject to satisfactory completion of standard volunteer recruitment checks, induction processes and appropriate training. However, additional training and support will be offered to those who may find standard operating modes more of a challenge, such as those affected by homelessness, drug misuse, unemployment or educational exclusion. There are a large variety of roles open to members of the target community (and others), including on-air presentation, production, programme scheduling, community reporting, fundraising, engineering and technical, administration, finance, and promotion.

Our volunteers are provided with induction training and all the necessary training for the relevant roles within LCR1. Training is led by experienced volunteers. We also encourage local community organisations to get involved and to provide content for our service. We have several regular contributors who provide features covering specific topics that will interest our listeners, such as accessing adult education services, dealing with racism, access to public services, lifestyle improvements, events and creative activities, as well as volunteering opportunities.

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

We have over sixty existing volunteers, many drawn from the African-Caribbean community in Leicester, but also from all backgrounds and walks of life, reflecting the historical and present-day experiences of a people of African-Caribbean heritage, and those who identify or express an affinity with the vibrant culture of Leicester's African-Caribbean community. We maintain, however, that improved social cohesion is one of our principle aims of our service, which we facilitate by supporting a broad cross-section of people from our community, which is in line with our agreed audience profile of English-speaking people over the age of thirty-five years old who are characterised as being in economic groups D and E. We encourage our presenters to talk about their experiences and the communities that they live and work with, and to engage with our listeners to involve them in our programmes.

We encourage our listeners and local organisations to engage with us to talk about the things they do, including the initiatives and events that they are involved in. We always aim to be proactive in contacting people with a story to tell or something to say. We offer to promote what they are doing and encourage our listeners to get involved and let us know how they are getting on. We showcase volunteer and other opportunities that we believe will interest our listeners and encourage them to get involved in our community, thereby benefiting both themselves and the wider community. Our priority is to enable people with lived experience of health, employment or educational challenges, to share their experiences directly, and to add to the general understanding of these issues.

We achieve these aims by generating content in:

1. Information bulletins (what's on, etc).
2. Discussion programmes.
3. Social-action programmes talking about social issues locally.
4. By exposing people to different cultures and themes through cultural education content.

The primary purpose of LCR1 is to foster enhanced community cohesion, which we describe as "better understanding of your target community and the strengthening of links within it."

- 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.**

LCR1's volunteers have many years' experiences running community radio services and projects. Our volunteers are drawn from many walks of life and age groups. They have a wealth of business, community-based, academic and third sector experience, including small and large business owners, healthcare professionals, teachers, and former public servants. In addition, LCR1 is associated with several local mutual aid and community groups and organisations that support local people, charities and not-for profit organisations. This includes The Race Equality Council, the African and Caribbean Centre, Health-watch Leicester, and others. These organisations provide us with specialist advice and support as well as introducing us to valuable networks of local experts and community leaders. The day-to-day operation of the service is handled by a station management team, whose members have significant experience and knowledge of training, administration, broadcast engineering and general business management. Several of our volunteers have experience working internationally to support UNESCO-based community radio projects in Western Africa, the Caribbean and Thailand.

## 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.**

LCR1 is operated entirely by volunteers. Volunteering is open to all individuals aged eighteen or over, subject to satisfactory completion of standard volunteer recruitment checks, induction processes and appropriate training. Our current volunteers are drawn from many different backgrounds and walks of life, including medical professionals, local businesspeople, students and people who are unwaged. With ages ranging from eighteen years to eighty years, we currently operate with over sixty unpaid volunteers.

Roles are decided by the volunteers and are drawn from volunteers who are members of our target community, including on-air presentation, production, programme scheduling, journalism, fundraising, engineering and technical, administration, finance, and promotion. Volunteer roles provide opportunities for members to develop technical skills and experience, build confidence and improve interpersonal skills, enhance skills in management, customer services and communication. Our experience shows that volunteers appreciate the variety of opportunities available, often joining to undertake one role and then becoming more interested and involved in others.

Volunteer opportunities are promoted on-air, on our website and through social media. We also have existing relationships with our partner organisations and local universities and colleges. All our volunteers are provided with induction training and all the necessary training for the relevant roles within our organisation. For those roles that are related to on-air work, volunteers are trained in the operation of our studio equipment, general presentation and interviewing skills and their legal and compliance obligations. This training is led by a training officer and by those experienced volunteers currently involved in operating the 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 broadcast on air messages, typically more than ten times per day, identifying a complaints email address. We also separately broadcast at least five times per day a feedback email address, to encourage wider and more diverse comments and feedback. We broadcast our monthly training sessions which are preceded by an “open studio,” where people can come and find out more about LCR1’s ethos and operations. We regularly attend prominent local events. We encourage feedback through our website and across all our social media platforms. We run two events, typically summer BBQ and Winter Awards Evening, for presenters and members of the public to attend, which is in addition to our regular “LCR forum” sessions, where members of the public, listeners, presenters, can all ask questions and discuss topics of concern about the output of the station. We do everything we can to allow the target community (and others) to contact us and give their feedback, which we act upon in a timely and open manner.

- 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.**

LCR1 believes that a dialog with listeners and supporters enhances our work, and that feedback from our community is an important tool in understanding how our service is being received, and whether our objectives are being met. Queries are acted on by delegated members of our management team, who are trained to provide a timely and appropriate response, in line with our published complaints process. Most matters that are raised in this way are straightforward and usually require only an acknowledgement or explanation. Where the matter raised is considered important or where further action is appropriate, it will be formally considered by the management team. In addition to resolving the query, we will use the experience of providing feedback to learn how to engage more fully with members of our community, and thereby generate further interest and goodwill. Serious matters of a safeguarding nature will be dealt with in line with LCR1's safeguarding policy. Correspondents with Issues related to programming that can't be resolved internally will be advised to communicate their concerns to Ofcom.

## 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
LCR1 (the on-air name of the programme service as in question 3.1 of this application)>	<p><b>LCR1</b> <i>is a radio service intended to serve</i></p> <p>NOTE: The next 3 headings below are the components of the 'character of service'.</p> <p><b>English Speaking Over-35's, particularly those suffering from deprivation in</b></p> <p><b>Greater Leicester Urban Area</b> NOTE: this can be all, or a subset of, the area covered by the radio multiples service described in the next column&gt; (<i>"the target community"</i>) by</p>		<p><b>Leicester</b> as in question 3.2 of this application, specify if small-scale or local multiplex the radio station plans to broadcast on&gt;</p>



	<p><b>LCR1 is a service aimed at racial integration, community cohesion, helping the unemployed and low-earning people progress their career and helping the homeless.</b></p> <p><b>LCR1 has a commitment to at least 20 hours per week (but no more than 25% of total output) of programming for the Afro-Caribbean Community</b></p> <p><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></p> <p><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></p> <ul style="list-style-type: none"> <li>• <i>the facilitation of discussion and the expression of opinion,</i></li> <li>• <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></li> <li>• <i>the better understanding of the particular community and the strengthening of links within it.</i></li> </ul> <p><i>Members of the target community shall contribute to the operation and management of the service.</i></p> <p><i>The service shall have mechanisms in place to ensure it is accountable to its target community in the specific area or locality.</i></p>		
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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).

We have delivered Ofcom compliance training since 2015 and been involved with broadcast radio since 1981. Compliance training has been self-taught through extensively reading the Ofcom Broadcasting code on multiple occasions, and we have developed training courses in collaboration with other people, such as Dr Rob Watson who is one of our advisors. Therefore we consider that each of the directors has received sufficient training, as well as having been a party to the LCR licensed AM and FM services since 2017. LCR1's training is designed to be accessible and memorable, given the diverging cultural expectations of our volunteers, and volunteers are encouraged to follow-up with questions and regular planning sessions with more experienced programme volunteers.

- 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.

Each of the station directors have experience of developing compliant broadcast content. LCR1 has been broadcasting as a Low-Power AM licence since June 2021 and we have held an Ofcom Covid RSL for fifteen months, in addition to several RSLs prior to this. We have well established systems and processes to monitor and ensure compliance with the appropriate codes, rules and legislation that applies to our service. The LCR1 compliance team also works closely with the stakeholder partners to develop training for new and existing presenters. Key topics include, but are not limited to: the Broadcasting Code and how the Code relates to our programming, programme content, avoiding bias, offensive language, religion, and the election rules for broadcasters.

- 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.

**Programme Manager:** Sets and monitors the LCR1's programme policy and manages the programme schedule. Reviews music and other material before it is uploaded to the online database and/or scheduled for broadcast. Works with the Compliance Officer and Training Officer to ensure that presenters meet required standards. The Programme Manager maintains an in-depth working knowledge of the Broadcasting Code and other legislation relevant to LCR1. The Programme Manager is responsible for ensuring that Key Commitments are met in so far as they relate to the content of programmes and broadcast content.

**Compliance Officer:** Reporting to the Programme Manager, the role holder monitors station output to ensure compliance with the requirements of the Broadcasting Code and with LCR1's policy and guidelines. Schedules music and other content to meet station policy and following guidelines provided by the Programme Manager.

**Training Officer:** Reporting to the Programme Manager, the role holder develops and delivers a training programme to ensure that station policy and regulatory requirements, including the requirements of the Broadcasting Code are met. Delivers induction and presenter training for new presenters, from the start of their membership through to the completion of their initial training. The Training Officer also provides ongoing training for presenters to ensure that they maintain standards in line with the Broadcasting Code and with station policy and guidelines.

- 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.

All our volunteers are provided with induction training and the additional and ongoing training that is necessary to carry out the relevant roles within our organisation. For those roles that are related to on-air work, volunteers are trained in the operation of our studio equipment, general presentation and interviewing skills. Training is led by experienced volunteers. New presenters are mentored by our training officer, who will monitor their progress and is available to answer any questions that they might have. We also have access to the training opportunities provided by local organisations. All on-air presenters are trained to understand their legal responsibilities. The Broadcasting Code is covered during training and a copy is provided to all volunteers.

We intend to require presenters to adhere to a general format and style guide that defines the LCR1 service, but we will rely on individual discussions with experienced volunteers to nurture and support volunteers to develop creative approaches to their programming, as they feel confident. The timescale for training depends on each individual volunteer and their outside commitments, but most new members complete their initial training within a three-month period. Our output is monitored by the LCR1 directors, and constructive feedback is provided to presenters on things they have done well and those areas that require improvement. Where there is concern that standards are not being met or there is a risk that the Broadcast Code might be breached, remedial action will be taken as required. This may involve further training or may require the temporary or permanent removal of that presenter from broadcasting on the service.

- 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.

Induction training is mandatory for all new volunteers. Additional training is provided as required depending on the role, but is mandatory for all volunteers that will present on-air. All volunteers must sign our Volunteer Agreement before their role and involvement with LCR1 is confirmed. By signing the Agreement each volunteer agrees to abide by the rules and values of LCR1 including, amongst other things, to comply with the Broadcasting Code, other legislation and station policies.

- 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.

All output is delayed by thirty seconds and can be cut before any offensive language goes on air. All presenters are trained in the operation of this system. Before going on air we discuss with guests what they want to talk about, and any challenging areas are considered in relation to the Broadcasting Code. Where a guest plans to talk about a particularly challenging topic, a senior member of the compliance team will usually be available or in attendance, but not necessarily take part in the programme. No new presenters go live immediately, they must demonstrate the right aptitude with pre-recorded programmes before going live, to ensure that they have respect for the internal compliance regime. The programme manager will make checks to ensure that the presenter understands the requirements of the Broadcasting Code, and understands how to deal with problems that might occur when on-air, including compliance breaches and the actions of guests.

- 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.

Music and pre-recorded features may only be loaded into our playout system by the programme manager or by an experienced volunteer, following compliance checks. Only a small number of experienced presenters are permitted to use their own music collections and their shows are closely monitored by the programme manager and compliance officer for compliance with the Broadcasting Code and station policies. We do not normally use content that is sourced from outside, though some programmes may use features that are produced by outside sources, such as those provided by the Audio Content Fund and other community radio syndicated shows. We only schedule shows from reputable and reliable sources, however, series and shows of this nature are reviewed by the programme manager before we agree to broadcast them. All volunteers must sign our Volunteer Agreement before their role and involvement with LCR1 is confirmed. By signing the agreement each volunteer consents to abide by the rules and values of LCR1 including, amongst other things, to comply with the Broadcasting Code, other legislation and station policies.

- 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.

Each month the LCR1 management committee discusses the output of the station, and looks at hours broadcast, type of programmes, audience feedback and matters of potential controversy, to ensure that there is compliance. Although currently LCR1 has no key commitments, we have adhered voluntarily to our October 2017 FM license application proposed key commitments, and we review regularly how we feel we are meeting and exceeded them. We are committed to maintaining the spirit and practice defined by the statutory obligations defined in the Community Radio legislation. We periodically publish a brief report in our committee minutes and provide a full report for our bi-annual public meetings.

- 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.

LCR1 directors are responsible for ensuring that records of our compliance with our Ofcom Key Commitments are maintained. Compliance with these commitments is reviewed at directors meetings, and a written summary is included within our annual report and accounts, which is made publicly available on our website. News stories about our activities are published on our website and social media accounts. Selected features are retained within our website archive to demonstrate how we have fulfilled our commitment to health and wellbeing programming and to our social gain commitments.

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

English and Caribbean based English derivatives and dialects

- 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 compliance team are fluent in English. Most are fluent in Caribbean dialects, and all can understand the Caribbean dialects basically, particularly to identify the offensive language and terms.

## 5. Declaration

### About this section

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

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

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

The declaration must also be dated.

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

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

Dr Rob Watson (see accompanying authorisation letter)

**Date of application:**

14<sup>th</sup> March 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](#)**