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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):

TorDab Ltd

Proposed service name:

Devon20Twenty South Devon

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):

Paul Nero, 1 Oak Tree Place, Manaton Close, Exeter, EX2 8WA

[paul@radioexe.co.uk](mailto:paul@radioexe.co.uk) 01392 823557

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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](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 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):

TorDab Ltd

2.2 Company registration number stated on Companies House:

14248568

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:

c/o Radio Jingles, Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB

- 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.devon20twenty.com

- 2.7 How will the service be financed? If the applicant is receiving, or is likely to receive, any form of funding and/or financial assistance to establish and maintain the service, please provide details of who is providing that funding/financial assistance and the extent of it.
- If you are receiving funding from, or on behalf of, a source that could be considered a political organisation or a religious body, you must set out the nature of that organisation here.

Participants in the company will introduce loans to establish the service.

We will have a number of advertising and sponsorship opportunities, compliant with the BCAP and Broadcast Codes.

We will raise modest sums from member subscriptions.

## 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
Derek Bernard Sharp	Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB	UK	Radio Jingles Limited; South Devon Radio DAB Ltd; Alpine Lodge RCH Ltd, Alpine Lodge Trading Limited, Brands Media Limited	Managing Director, Alpine Lodge RCH
Julian Richard Sharp	Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB	UK	Radio Jingles Ltd; South Devon Radio DAB Ltd	Managing Director: Radio Jingles
James Parker	Torbay Weekly, c/o South Devon College, Vantage Point, Long Road, Paignton, TQ4 7EJ	UK	Devon Cricket Board Limited	Editor: Clear Sky Publishing
COMMENTS: Following award of a C-DSP licence and a multiplex licence to TorDab, and ahead of Devon20Twenty South Devon will be incorporate as a separate company, wholly owned by TorDab, in order to ring-fence the company as a not-for-profit organization.				

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.

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



Full name of >5% participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
TorDab Ltd	100	100	100	100

- 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
South Devon Radio DAB Ltd	c/o Radio Jingles, Unit 3, Marble Business Court, Lymington Road, Torquay, TQ1 4FB
Exe Communicate Ltd	1 Oak Tree Place, Manaton Close, Exeter, EX2 8WA
Clear Sky Publishing	Senate Court, Southernhay Gardens, Exeter, EX1 1NT

- 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	N/A	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
South Devon Radio DAB Ltd	c/o Radio Jingles, Unit 3, Marble Court Business Park, Lymington Road, Torquay, TQ1 4FB	TorDab Ltd

- 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 of-ficership held	Affiliates of that body
N/A	N/A	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 corpo-rate listed in 2.11	Body corporate controlled	Affiliates of body corporate controlled
South Devon Radio DAB Ltd	TorDab Ltd	Devon20Twenty South Devon Ltd

- 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	South Devon Radio DAB Ltd			
Full name of >5% partici-pant	Number of shares	Total invest-ment (£s)	Total invest-ment (%)	% of voting rights
Derek Sharp	1	1	1	33.33
Julian Sharp	1	1	1	33.33
Denise Hulme	1	1	1	33.33

## 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; <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	

## 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?

<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.

**No**

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

Licence number	Name of multiplex

- 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

- 2.19 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
2011 onwards	AL000318BA/3	Radio Exe
2017 onwards	DP101968BA/1	Radio Exe Devon
2022	DS103895	ExeDab Ltd

- 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	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	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	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	N/A	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 expanding the table if necessary:

Licence number (or equivalent)	Name of service or multiplex	Nature of the breach	Sanction imposed	Date sanction imposed

C-DSP licence: Application form (Part A)

N/A	N/A	N/A	N/A	N/A
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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	N/A	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
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## 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?

Devon20Twenty – South Devon

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).<sup>3</sup>

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<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/o Radio Jingles, 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.**

Devon20Twenty will be an innovative new radio and digital news and information service for South Devon, produced largely by community volunteers, overseen by a small project management team, focused on news and information for the area, and aimed at people who want to know about the area in which they live, work or play.

A rolling news service, it will provide 20 minutes of news, weather, what's ons, features and information, every 20 minutes. Initially content will be updated two or three times a day.

Our primary focus will be South Devon, meaning Torbay, the South Hams and Teignbridge areas which are covered by the Torbay small-scale DAB area.

Data from Torbay Council and the South Hams shows a demographic that skews older – an age profile that is getting older too. The area, particularly South Hams, also skews towards ABC1. Both these characteristics are slightly less pronounced in Teignbridge, which makes up a smaller part of the area, but are typical of South Devon overall.

Last year, one of our associated organisations, Radio Exe, commissioned interns from the University of Exeter to undertake an initial study into the feasibility of providing a volunteer-led local news and information service and whether such a project could be sustainable.



As a result of the findings, we believe such a station can fulfil a range of social gain objectives and build an audience. Because of the nature of the content – wholly speech-based and repeated for large chunks of each day – average hours are likely to be small, but reach could be relatively large. Our studies indicate that Devon20Twenty can be a useful resource for people in South Devon, and a service they listeners can dip in and out of – as well as take part in.

Our Exeter University intern research indicated the older, upmarket audience is generally less well served by existing local commercial and community stations, but that a general audience can be attracted too, especially if the volunteer body draws from a diverse local pool. The older, upmarket demographic is more likely to prefer speech content than other demographics, but they expect that speech to be of high quality or high functional use. Younger people expected shorter items “news they can use.”

- 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.**

TorDab will ring-fence this C-DSP service from the company that will run the multiplex licence, should we be successful in that application.

In order to do this, Devon20Twenty South Devon will be incorporated as a separate company limited by guarantee.

A new oversight board will be established to run Devon20Twenty South Devon, and to ensure it is run for social gain: both in terms of the volunteers it will recruit and the service it will provide to the community.

We have two key aims:

- to provide a high-quality local news and information service for Devon in general and South Devon in particular, and
- to provide high-quality journalism and social skills training for people interested in providing a community news service.

In short, profit is not an objective of this service.

Funds raised will be purely used for operational costs and improving and extending the service.

As part of Devon20Twenty's commitment as a company limited by guarantee, it promises to use any surplus to:

- pay course fees so more volunteers can access journalism training courses
- Enhance studio and remote recording facilities so volunteers can participate from home or other areas in South Devon
- Extend output from the initial 'twice or three-times-a-day' updates we expect to broadcast at launch

## 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.**

Devon20Twenty will provide a rolling news service for South Devon: all the news local people need in 20 minutes, every 20 minutes. For the community, that means whenever they want to hear local news, weather, what's on, local sport, short interviews, community information, all they need to do is switch on. No other local broadcaster is doing this.

Initially the content will be updated twice or possibly three times a day, with a sustaining service overnight of content that is not time-specific. The aim would be to expand the service gradually, if funding and availability of volunteers allow.

Social gain therefore extends to the volunteer base that produces the content, overseen by a professional producer and project/station manager. With no disrespect to the great work many music-based community stations do, because of the nature of news and information, we will need a quality threshold for volunteers who will learn the importance of compliance with not just the Broadcast Code, but media law in general. We will provide meaningful training so people can develop skills, recruiting a diverse range of members, from students to seniors, who have the potential to produce great content, on-air and online, or support those who do so.

Our training will be in news, broadcasting, media law, compliance and communications, so we create a unique service that is innovative, builds pride in place and links with organisations across the area so we tell more stories about South Devon. We will liaise with organisations such as Torbay Community Trust, which brings together more than 100 volunteer groups in the area, and similar organisations in South Hams and Teignbridge.

As well as the Devon20Twenty radio service, local news and community information will be published online and on social channels.

We aim to:

- Boost a sense of community and civic pride through an innovative station that no one else is doing
- Use the professional backgrounds of our participants and networks to enthuse volunteers to produce a high-quality, highly respected service
- Help volunteers into new roles or careers, should they want them; and build new friendships for older members of the team
- Empower local groups to get their voices and stories heard
- Create a cross-generational environment in which young people can build life experiences and older people can enjoy a creative outlet where their experience will be valued
- Subject to funding, we hope to provide training to Level 3 in journalism – ideally the NCTJ certificate - for volunteers who want it – and quite possibly to level 5 for some leading volunteers too

- In due course, will hope to create similar services for other parts of Devon, taking advantage of the roll-out of small-scale DAB

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

Our provisional format includes “local story in more detail”, “local sport” “entertainment news” “local democracy story” “community news and interview” “feature/review/preview” and “local business news.” All are relatively short segments, but interviews will be a critical part of content generation. Whilst opinions can be expressed in such interviews, we will not host discussions on air, but we have little doubt that a wide range of local voices and stories will facilitate off-air discussion. We will have Devon20Twenty social media channels, which will generate comments, and extended articles and opinion pieces on our website, which will promote on-air. Our digital/social/web content will be an important element in our content production and training in journalistic skills. We will moderate discussion where necessary to ensure discussion stays within generally accepted standards.

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**.

Devon20Twenty will initially be based at the South Devon Radio studio, less than a mile from the centre of Torquay, which is easily accessible by public transport, including a railway station a five-minute walk away. We will enter discussions with an education provider/community arts association to host a second studio in a different part of South Devon.

All volunteers will undergo an induction programme and all, other than qualified journalists or people with more than two years professional broadcast experience, will be required to participate in a structured training programme, covering compliance and media law. This training will be delivered by experienced, professional journalists or broadcasters. Training in audio (and possibly video) production and interviewing skills will also be offered.

Subject to funding, we hope to be able to offer a formal Level 3 training course in journalism, and ideally the NCTJ certificate, and for some leading or extremely promising volunteers, possibly to the level 5 diploma.

To manage any increased interest in participating, we will introduce train-the-trainer sessions on technical and general production skills, but compliance and media law training will always be undertaken by qualified journalists.

We will 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 NCTJ, 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.**

The target community – people who live in, work or come to South Devon for leisure – is central to our proposed output. As a news and information station, we will cover stories, events and listings from across the area – and because it is a rolling service, Devon20Twenty will always be available.

We will proactively search out stories that deserve telling. We will encourage organisations to let us know their news and events. We hope to recruit a diverse range of volunteers, with a high expectancy that most will have links with other South Devon groups. At some stage, depending on resources, we intend to appoint a community liaison officer, ideally as a paid position. Initially it will be possible to give such responsibility to a volunteer, so we can encourage volunteers who wish to be members of the team without necessarily becoming involved in journalism or production.

- 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.**

This is a nascent organisation. We have undertaken research and have the studio resources and the finances to launch. Whilst we do not have a full team in place – and, as yet, no small-scale DAB service to launch on - the principals behind the project who will drive the board, and who will recruit more members, are experienced broadcasters, producers or journalists.

The idea was initiated by Radio Exe, which commissioned a project from Exeter University to assess the community engagement element. Whilst Radio Exe may not be permitted to be a participant in a community radio licensee, members of its team are able to provide training in journalism and compliance as far as is allowable. The station has a track-record in training people in broadcast and online news production.

South Devon Radio's Julian Sharp will oversee technical and production training.

We will appoint a station manager who will be editorially responsible for content and for managing the team, and for whom provision of training will be a core part of the job.

Participants in TorDab are experienced in training people in journalism, broadcasting and production, and will bring their skills to the project on a voluntary basis.

## 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.**

Participation is the most exciting part of this project. Although we will require professional station management, the intention is that Devon20Twenty is a volunteer-run service, providing a high-quality experience for those people who wish to become involved. That experience could be in production, presentation, research, interviewing, online & digital, or back-office support. It could be the training we intended to provide, which could be informal sessions in journalism, media law or broadcast production, or could be a formal course, subject to funding, such as the NCTJ Level 3 certificate or Level 5 diploma in journalism. Our ambitions are greater if we can make a success of this, with the potential to link with colleges to provide higher level training.

We will recruit volunteers from across the South Devon coverage area, for example by working with schools and colleges to interest post-16 students interested in journalism and media; and local groups that help find employment and training opportunities.

In terms of management of the service, subject to funding, the station manager and one assistant will be the core paid team, overseen by the board (voluntary roles with the legal oversight of the enterprise). Senior volunteers with specific expertise (community engagement/ finance/ production, for example) will be part of the operational management committee. We want to create a high-performing, highly engaging, creative team that produces accurate, fair, informative rolling news content for the area. This won't be a project which will be suitable for everyone; we are critically aware of the compliance and legal issues around news production. But above a 'quality threshold' that ensures volunteers have the potential to succeed and develop, we will be welcoming to everyone, whatever their background or stage of life.

## Accountability

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

We will promote the service widely, and list contact information on the Devon20Twenty website, which will include a 'get involved' section.

We will direct listeners to our website and social channels so they can make comments about the service.

Our volunteers will have representation on the management committee (below the trustees/board level).

Our board/trustees will include representation from the target community.

We will have an annual open day/town hall meeting, inviting comments and opinions, and encouraging people to volunteer.

We will 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 individual volunteers, conducting interviews, for example, where we will engage informally with potential and actual listeners.

- 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 will keep a log of complaints/suggestions and review them at management meetings.

Our board/trustees includes experienced journalists who understand the difference between vexatious and meaningful complaints. We would expect some criticism of news content. We will train the team so that they act upon reasonable criticisms, but do not give in to undue pressure from those with vested interests. We will ensure balance across the output; and ensure our content is fair and accurate. Sometimes that causes complaints.

We actively welcome suggestions/criticisms about the running of the service, and how we can manage and improve the volunteering input and embrace a diverse team.



## 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
<ENTER THE SERVICE NAME (the on-air name of the programme service as in question 3.1 of this application)>	<p><i>Devon20Twenty is a radio service intended to serve Residents and visitors in South Devon</i></p> <p><b>Devon20Twenty</b> will be an innovative new radio news and information service for Torbay, produced largely by community volunteers, overseen by a small project management team, broadcasting 20 minutes of news, features and information every 20 minutes.</p>	<p><b>20 minutes of rolling news and information, every 20 minutes, updated three times a day</b></p>	Torbay

C-DSP licence: Application form (Part A)

	<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).

The person with overall responsibility for compliance is a senior executive at a commercial radio station who has been responsible for broadcast compliance for many years. He has an extensive background in TV, radio, newspapers and advertising, with associated knowledge of regulatory and voluntary codes. Whilst running a commercial radio station, he has organised in-house compliance training, including one day with Ofcom attending to run a workshop.

Devon20Twenty will not employ phone-paid services.

The station has a relationship with Radio Exe, which runs the BBC local democracy reporting service for Devon, and has agreed to provide compliance advice and training.

Compliance training will be part of the station's ongoing training with volunteers. Subject to funding, we will encourage as many volunteers to undertake an NCJT course.

- 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.

The person named has been a broadcast journalist and occasional presenter with a commercial radio station since 2019, whose work has always been broadcast compliant. He has been involved in training new entrants in journalism. He reviews Broadcast Bulletins, sharing relevant case studies with the team.

- 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.

The station manager, who will be on the board too, will have day-to-day responsibility for compliance. The 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 will have detailed on-air presenter guidelines, which heavily reference compliance issues.

The station assistant or a senior volunteer with IT/engineering skills will be responsible for the logger, ensuring we keep recordings for at least 42 days.

- 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 will provide 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 will 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 regulated, licensed broadcaster.

We will have regular journalism training sessions, including compliance training and media law training

We will encourage volunteers to undertake an NCJT course and to make use of the free resources on the Ofcom, BBC, NCTJ, Radio Academy and RadioCentre websites.

We will be training as many volunteers as possible to NCTJ Certificate (Level 3) and Diploma (Level 5), the latter of which includes a broadcast journalism stream.

- 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, compliance training will be mandatory for all team members. Additional journalism training will be mandatory for people who are responsible for content production.

- 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.

Yes, staff and volunteers will be required to undertake compliance training and participate in group meetings in which compliance will be an agenda item.

All volunteers 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.

All output will be pre-recorded, although sometimes very close to transmission. This provides a safety-net against non-compliant content going to air. Contentious material, of which we expect little, must be approved by the station manager or alternate.

This will not be a station that has live guest interviews.

We will make sure our volunteers 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.

- 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.

As described above, all output will be pre-recorded, although sometimes very close to transmission. This provides a safety-net against non-compliant content going to air. Contentious material, of which we expect little, must be approved by the station manager or alternate.

Devon20Twenty's rolling news service will be in 20-minute chunks, initially recorded twice a day. All segments will be reviewed by one of the qualified staff members or senior experienced volunteers before transmission.

Again, as described above, we will make sure our volunteers 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.

It is possible, subject to their agreement, that we may carry third party content from the BBC, which has a scheme for community stations to re-broadcast local bulletins. Sky bulletins and associated content is another potential third-party provider. As licenced broadcasters, we will take these contributions as compliant.

- 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.

Deovn20Twenty's station manager will be responsible for ensuring ongoing compliance with key commitments.

As a news service, the programme structure provides a strong framework for delivering on-air social gain commitments. Packed with stories from across South Devon, we will facilitate discussion on a wide range of topics – although such discussions may not be directly on-air, as we will not be running phone-ins – and facilitate a **better understanding of the particular community and the strengthening of links within it.**

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 South Devon and helped strengthen links between people in the area.

- 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, the station manager, reporting to the board, will be responsible for ensuring we meet our off-air social gain activities.

The station manager will register volunteers with training providers, such as NCTJ courses, and also for monitoring that our other voluntary roles draw on a breadth of people from South Devon.

Our board will review our membership base, volunteering roles and progress towards qualifications regularly, and at least annually. Working with the station manager, the board will ensure that journalistic training is provided by suitably qualified volunteers and that the number of people undertaking NCTJ courses is manageable within the funds available.

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 South Devon with high-quality local news and information, available whenever they want it – and to encourage participation by a diverse team for whom we will provide quality training.

- 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 compliance team members must be 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:**

28 NOVEMBER 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](#)**