

---

# Community Digital Sound Programme (C-DSP) licence

## Application form – Part A (public)

---

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

Reform Radio Community Interest Company

**Proposed service name:**

Reform Radio

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

Manchester DAB

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

# Contents

---

## Section

1. Overview	3
2. Applicant's details	6
3. The proposed service	18
4. Compliance of the service	31
5. Declaration	37

# 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):

Reform Radio Community Interest Company

2.2 Company registration number stated on Companies House:

08537221

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:

Reform Radio  
Bonded Warehouse  
18 Lower Byron Street  
Manchester  
M3 4AP

- 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	Samuel John Oliveira
Job title	Director
Address	Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP
Telephone	0161 806 0879
Mobile phone	07967457258
Email	sam@reformradio.co.uk

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

www.reformradio.co.uk

- 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.

**The service will be financed by our earned income as a production company, making programmes from corporates and partners such as the BBC.**

## 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 John Oliveira	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	UK	Sonder Radio LTD - Radio workshops, broadcasting and production  Reform Records LTD - Record Company  Grape Street LTD - Growing of Fruit	N/A
Jemma Louise Tanswell	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	UK	Sonder Radio LTD - Radio workshops, broadcasting and production  Reform Records LTD - Record Company  Grape Street LTD - Growing of Fruit	N/A

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

C-DSP licence: Application form (Part A)

Rachel Anne Roger	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	UK	Sonder Radio LTD - Radio workshops, broadcasting and production  Reform Records LTD - Record Company  Grape Street LTD - Growing of Fruit	N/A
Kurtis Akiel Reid	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	UK	Expressive Artz CIC = Youth Arts Project	Expressive Artz CIC

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
Comments				

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

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

Full name of the entity	Address
-------------------------	---------

Sonder Radio LTD	Sonder Radio LTD Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP
Reform Records LTD	Reform Records LTD Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP
Manchester DAB CIC	1a Manchester One, 53 Portland Street, Manchester, M1 3LF

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
Manchester DAB CIC	1a Manchester One, 53 Portland Street, Manchester, M1 3LF	Paul Lindsay Boon Edward Christopher Connele Gaydio Community Interest Company Lawrence Galkoff Associates LTD OpenDAB CIC

### 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

C-DSP licence: Application form (Part A)

Samuel John Oliveira	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	Sonder Radio LTD Reform Records LTD Grape Street LTD
Jemma Louise Tanswell	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	Sonder Radio LTD Reform Records LTD Grape Street LTD
Rachel Anne Roger	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	Sonder Radio LTD Reform Records LTD Grape Street LTD
Kurtis Akiel Reid	Reform Radio Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP	Expressive Artz CIC

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
Samuel John Oliveira	Sonder Radio LTD	Reform Radio CIC
Jemma Louise Tanswell	Reform Records LTD	
Rachel Anne Roger		
Samuel John Oliveira	Grape Street LTD	N/A
Jemma Louise Tanswell		
Rachel Anne Roger		
Kurtis Akiel Reid	Expressive Artz CIC	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	Reform Records LTD			
Full name of >5% participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Samuel John Oliveira	250	0	0	25
Jemma Louise Tanswell	250	0	0	25
Rachel Anne Roger	250	0	0	25
Reform Radio CIC	250	0	0	25
Comments				

Name of body corporate identified in response to question 2.11	Sonder Radio LTD			
Full name of >5% participant				
Samuel John Oliveira	1	0	0	25

Jemma Louise Tanswell	1	0	0	25
Rachel Anne Roger	1	0	0	25
Reform Radio CIC	1	0	0	25
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	Reform Radio CIC is currently contracted to deliver funded training programmes through Manchester Adult Education Service and Greater Manchester Combined Authority (ESF funded)
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	

<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.

A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	no	
An advertising agency or an associate of an advertising agency	no	

### Details of applications, licences and sanctions

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

**No**

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

Licence number	Name of multiplex

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

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

**No**

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

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

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

2.21 Is the applicant (i.e. the body corporate that will hold the licence) controlled by an existing licensee or by any person who is connected (within the meaning of Schedule 2 to the Broadcasting Act 1990) with an existing licensee (i.e. as a “participant”)?

**No**

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

Licence number	Name of service or multiplex

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

**No.**

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

Licence number	Name of service or multiplex

2.23 Is the applicant – or any person(s) controlling the applicant - subject to any current or pending investigation by any statutory regulatory or government body in the United Kingdom or abroad in respect of any broadcast-related matter?

**No**

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

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

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

**No**

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

Licence number (or equivalent)	Name of service or multiplex	Nature of the breach	Sanction 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:

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”.

N/A

## 3. The proposed service

### About this section

This section asks you to describe your proposed service, including the Key Commitments you propose to include in your licence. This includes your service name, multiplex name and character of service, in addition to standard commitments that all C-DSP licensees need to abide by. Holders of an existing analogue community radio licence to be a simulcast on the proposed C-DSP service can replicate the existing analogue key commitments as it is our expectation that the key commitments for simulcast services are to be in keeping with one another. If a licence is granted, the information you provide in this section will be used to form the basis of the annex to your licence. You will only be authorised to broadcast what is detailed in the annex of the licence.

In this section, you will also need to set out how your service will provide social gain, community participation and how you will be accountable to the target community. This is in line with statutory requirements for the granting of C-DSP licences. **The information provided in this section is also the basis on which decisions are made.**

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

### Your proposed service and target community

3.1 What is the proposed service name?

Reform Radio

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

Manchester DAB

- 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>

Reform Radio  
Bonded Warehouse  
18 Lower Byrom Street  
Manchester  
M3 4AP

- 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.**

---

<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.

Reform Radio broadcasts the best in music, arts and culture from Manchester to the world. As an arts organisation and community interest company, Reform Radio provides a wide ranging programme of projects and activities; aiming to support young people in accessing high quality culture, creative skills training, and to build meaningful career pathways.

Therefore, young people (18-30yrs) living within Greater Manchester is a key target audience for our radio broadcasting. We aim to use our radio station as a tool to reach and engage young people from across Greater Manchester, into one of our high quality, creative training programmes. Our community, who might not be strictly interested in the arts, are interested in careers and employment and look to the station for advice and access to workshops and support in this area.

However, our service will appeal to people beyond this demographic, and Reform Radio also serves a community of music lovers, DJs, artists and record collectors within Greater Manchester. This community is reflected in our large network of 500+ Reform Radio DJs and contributors. This audience is curious to discover more, as well as looking for avenues to share their work and musical and artistic discoveries.

- 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.**

Reform Radio is a registered Community Interest Company and has three Executive Directors, and one Non Executive Director. We have a conflict of interest policy in place and all Directors have equal voting (If Directors cannot agree on something, it is taken to our independent Advisory Board for decision).

Reform Radio is a registered Community Interest Company, meaning we are run not-for-profit, with no shareholders and Limited by Guarantee. Attached to this application are our Articles of Association, which not only set out our social mission and objectives but governs everything we do. It also sets out how all profit is reinvested into the business, with the sole aim of improving the future provision of the service and its social gain.

We have an Advisory Board in place (currently 8 members) that is independent of the staff team, with terms of reference and conflict of interest policy in place and members attending quarterly meetings with Reform Radio Directors. Organisational budgets, financial reports and KPIs are presented within this meeting alongside regular reviews of our policies and best practice.

The board has representation of the communities it serves, with dedicated places for young people and a Chair under 30yrs, 50%+ female/non-binary, and 50%+ from communities experiencing racial injustice, also with representation of young people with a disability, neurodiverse and trans young people. Membership terms are 2 years with an option to reapply with new goals set.

## 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.**

Last year we supported 380+ young people across GM (61% living in Manchester, 12% Tameside, 8% Salford, and 27% from across the other districts). We use the process of producing combined arts, and the platform of radio, to develop artistic, digital and transferable skills, while improving confidence and wellbeing.

Our rolling programme includes radio production, podcasting, DJing, creative writing, wellbeing and creative leadership programmes. As an indication - last year we delivered 768 creative sessions and hundreds of pastoral sessions, supporting 386 young adults; 83% of whom progressed into employment or further training. We created 228 paid freelance opportunities.

We provide a community studio space and broadcast platform to not only young people but our vibrant and diverse community of 500+ artists, DJs and presenters, all collectively contributing to a vibrant and engaging stream of arts content, broadcasting 24/7 on reformradio.co.uk.

We gather feedback from project participants through self assessment forms, 1:1 and group discussions. Over 80% of the young people we support report improved wellbeing, confidence and 92% report improved digital and work-based skills.

Collaboration is vital to RR and we have developed fruitful partnerships across the public, private and cultural sectors. Including; a wide range of community and engagement partners, such as the Princes Trust, housing associations and Sure Start Centres; Manchester City Council and GMCA; major funders, such as National Lottery and Youth Music; and corporate sponsors, such as footwear brand New Balance. We have been successful in establishing new clients for audio production; we are a growing independent radio producer for the BBC. We have also recently been announced as an Arts Council England National Portfolio Organisation.

*Podcasting with Purpose* is a dynamic and growing part of RR, developed from our outreach programmes over the past 2 yrs. As an organisation at the forefront of a rapidly expanding audio sector, especially in the North, we are in a unique position to support talent development. We deliver skills training, provide valuable networking, and paid employment. This diversifies artists' income; diversifies the voices/producers of audio content and the world it reflects; and diversifies our organisational income.

The quality of our production work is demonstrated through our awards and contracts. We've won Gold at the British Podcast Awards (2021) and make programs for partners such as Hits Radio, BBC Radio 2, BBC Sounds, and are producing the Friday night music show on BBC Radio 6 Music.

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

We provide multiple mechanisms by which our community can contribute to the service through and share opinions on matters of importance to them. Much of our broadcasting programme is co-created with young people from the communities we serve, generating relevant and inclusive content. For example, our monthly Be Well radio show, which includes discussions about the issues most closely related to young people's mental health, and special shows delivered in celebration of International Women's Day and Earth Day - broadcasting important discussions about women's safety, and climate change. We encourage our community to have balanced discussions on air as much as possible and provide information on how audiences can join such debates i.e via our online chat box or social media.

We are particularly passionate about facilitating discussions within our outreach programs and work. For every project we run, the young people produce a show and we always encourage them to have discussions and share opinions as part of this. Furthermore over the last few years we have been producing regular episodes of our specialist discussion program Open Forum. This format brings a group of young people together to have an open discussion about a niche topic and we encourage debate and freedom of expression as part of this.

- 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**.

Members of our target community can access our facilities by signing up to one of our free courses or workshops. These have been designed specifically to give this community access to high quality, industry standard studios and equipment

Something we're extremely proud of is our ability to engage all young people in arts creation, whether they see themselves as artists or not. For example, at the end of many of our projects, the young people taking part will deliver a live radio show. Our only rule, everything in the show must be produced by them - tracks, interviews, sound design, scripts etc. The young people are given the training to do this within the session times and within the same studios our service will broadcast on to do this. We block out time within our schedule to ensure that they always have priority access and have two studios to help ensure things run smoothly and don't clash.

The studios are fully accessible and are reviewed regularly by our team of Access Consultants who provide a steer on best practice and where improvements can be made.

Our studios are also made available, free of charge to local artists, DJ and presenters who would like to contribute to our schedule. Anyone can apply for a takeover by contacting our station manager and he, alongside the studio production team, will facilitate the access and training required to do this.

For our regular community of residents we provide regular free refresher sessions on studio equipment, alongside more in depth training on production best practice as well as industry talks and socials.

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

Our service is made wholly thanks to the efforts of our community of over 500 regular artists and DJs as well as 350 + young people. As a result the service gives a thorough understanding of the interests, thoughts and opinions of this community.

Getting on DAB will allow us to reach deeper into our target community and engage new people in our activities. With more people joining our programmes we will get a deeper and better understanding of their needs, ensuring our work is tailored for maximum social impact. Bringing the voices of young people to a wider audience will help strengthen the ties within the community and give them the space to articulate their issues and needs in the hope that people will be more empathetic and able to help.

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

We have been running our social gain services for 10 years now and have consistently delivered positive outcomes for our community. Last year alone we delivered 768 creative sessions and hundreds of pastoral sessions, supporting 386 young adults; 83% of whom progressed into employment or further training. We created 228 paid freelance opportunities. Our vibrant and diverse community of 500+ artists and DJs, supported by our volunteers and producers collectively contributed to an engaging stream of arts content, broadcast 24/7 on reformradio.co.uk.

We gather feedback from project participants through self assessment forms, 1:1 and group discussions. Over 80% of the young people we support report improved wellbeing, confidence and 92% report improved digital and work-based skills.

Our impact on the artistic landscape is about the individual journeys we support, from creatives who would otherwise not have the skills, confidence, networks and opportunities. Such as Zara, 27 from Preston, took part in HERchester, and has gone on to support signed UK rapper OneDa and has had paid gigs including a festival performance at Sounds From The Other City.

## 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.**

Members of our target community are given the opportunity to operate and manage our service through the free outreach workshops we provide. These are advertised through a range of channels, from social media through to links with our strong network of engagement partners. Partners include youth centres, cultural partners such as the Royal Exchange Theatre, housing associations, major charities such as The Princes Trust, and educational partners.

These workshops and training programmes are the core of what we do and happen regularly throughout the year, with a different focus for each programme, giving our community a range of ways to participate that reflect their interests.

Our courses give participants a thorough introduction to the station, its governance and the myriad of ways in which people can participate. Not only are they facilitated to operate equipment and produce content for the station, we introduce them to further activity within the organisation. This includes how to go about pitching for a show and we have a rule by which we will always support anyone to do a Takeover on the station, this includes our wider community of artists, DJs and presenters.

We regularly put organisational decisions out for consultation, including applying for this license, as well as opportunities for young people and our DJ community to join our advisory board or even apply for paid roles within the organisation.

## Accountability

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

As an organisation our programmes and strategies are steered by the communities that we serve. In the planning of our activities, our programme planning is informed by the feedback of our participants, through 1:1 and group discussions, and surveys. It is also informed by the opinions of our 'target' communities - through consultation with community partner organisations and groups of young adults through taster sessions and forum discussions.

In the delivery of our activities - Our embedded evaluation process means that we gather and respond to participant's feedback throughout the delivery of a programme. Our programme delivery is also supported by our community partners - who have extensive knowledge and understanding of their communities, built through long-term and meaningful relationships with the people they support. In the content that we broadcast - Reform Radio broadcasts the best in music, arts and culture from Manchester to the world. We also welcome feedback from our community of artists, DJs and presenters and provide regular forums in which they can provide feedback, suggestions or criticism. We regularly send out emails asking for feedback as well as polls and opinions.

In our governance and leadership - We are committed to having a workforce and an Advisory Board that represents lived experience of the young adults we support - with 90% of our workforce being former participants, with an Advisory Board Chair under 30; 2 places reserved for young people currently on our programmes, and a commitment to 70% of the Advisory Board being under 30yrs in the next 5 years.

- 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.**

Our embedded evaluation process means that we gather and respond to participant's feedback throughout the delivery of a programme. Our programme delivery is also supported by our community partners - who have extensive knowledge and understanding of their communities, built through long-term and meaningful relationships with the people they support.

All feedback gathered as part of our programme evaluation process is used to inform future programme delivery. We have weekly meetings where this feedback is tabled as part of the agenda and adjustments made as necessary.

Likewise we have weekly station meetings where any feedback from our community is tabled and we work to implement that feedback as best we can with the resources we have.

We have a robust complaints policy and procedure which details how a complaint is registered and handled. Complaints can be made in any number of ways from verbal through to written, via email or letter. We take all complaints seriously and also have the services of an external HR company to advise on this as well as staff disciplinary procedures if required.

## 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
<p><b>Reform Radio</b> (the on-air name of the programme service as in question 3.1 of this application)&gt;</p>	<p><b>Reform Radio</b> <i>is a radio service intended to serve young adults, between the ages of 16 - 30 with an interest in music, arts and culture and living in Great Manchester.</i></p> <p>The aim of the service is to engage young people through this content and steer them to free skills development and employment workshops as well as opportunities to contribute to the service itself.</p>		<p><b>Manchester DAB</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>		
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

## 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).

Sam Oliveira - Compliance training as part of BBC Talent Pool, June 2012. Refresher training in November 2021 as part of work for BBC Radio 6 Music.

- 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.

Sam Oliveira has been a director of Reform Radio since its inception in 2013. We've been broadcasting online since 2014 and he has overseen compliance of the station since then, where we have maintained, as far as possible, Ofcom Standards to ensure young people are receiving industry relevant training and experience.

Sam is currently Executive Producer on the weekly Friday night music show Reform Radio produces for BBC Radio 6 Music. He has also acted in this capacity on all other commissions Reform Radio has made for third parties, this includes programmes for BBC Radio 2, 1Xtra, Hits Radio, Gaydio and over 21 community stations across the UK.

- 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.

Compliance Officer - To monitor overall compliance of this service and liaise with Ofcom if required. They will oversee compliance standards and ensure all terms of the license are met and that staff have received adequate training to meet these terms and internal editorial expectations.

Station Manager - Will day-to-day ensure all compliance processes and procedures are adhered to by production teams and contributors to the service. They will be the first point of call for any compliance issues or questions from members of the team or community. They will be responsible for managing and keeping recordings of all live broadcasts as required by the code.

- 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.

We will be giving all production staff or those who have oversight on project content, formal compliance training ahead of the service going live. This will be delivered by a trusted external provider who has over 15 years experience in compliance for both radio and TV.

We will also be giving all production staff training in our non-compliance procedure, which gives them clear steps and complete authority to act if compliance standards are compromised.

Presenters will not be required to do this training however they will need to re read and re-sign our editorial guidelines ahead of the service going live. Links to the Ofcom code will be made available as part of this.

- 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.

This training will be mandatory for all production staff, senior members of the station team as well as facilitator staff and freelancers who are responsible for working with young people to produce content.

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 regular presenters as well as those doing takeovers are required as part of their onboarding process to sign a declaration saying they will adhere to our editorial standards. These editorial standards mirror those of Ofcom and include links to the full code and help ensure all live shows are aware of their compliance obligations.

Each presenter is sent a reminder of their upcoming live show ahead of broadcast, within this email is a reminder that they must adhere to the station's editorial policy with a link to that policy. As part of this email we ask the presenter to summarise the content of their show, which provides an opportunity to flag and address any compliance concerns.

Before each show goes live, DJs are asked if any tracks might be non-compliant and they are asked to remove them from their sets if so.

Production staff have a clear procedure to follow if non compliant content is broadcast. This, at its core, includes complete authority to take the show off air if in any doubt or a serious incident occurs. We have already built a fail safe system that takes the show off air at the click of a button and instantly begins broadcasting a compliant back-up program.

For swear words or non compliant references within songs, which might have been missed by pre broadcast procedures, DJs are asked to immediately fade out the track and issue an on air apology. We also have a pre recorded drop which serves this purpose.

This incident is then logged within our internal show-by-show report system, with the station manager flagged via email. The DJ in question is then warned about this breach, with repeated violations resulting in them losing the right to be able to broadcast live on the service.

- 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.

All pre-recorded content, whether produced by our community, young people or from third parties, is given a compliance listen ahead of broadcast on our service. Production staff know they can speak to the station manager and compliance officer if they have any concerns. Again our bottom line is, if in doubt, don't broadcast and again production staff are given full authority to make that call as well as any edits they see fit to ensure compliance is met.

- 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.

Our station manager keeps a detailed log of all shows that are broadcast on the station and the demographic of those taking part. They will then run a report every quarter and present this to the directors to ensure we are meeting the obligations set out in our key commitments and that our target demographic are inputting significantly to the output of the service.

Senior management also looks to ensure we have a regular schedule of content produced by young people on our outreach programmes and ensure there is a pipeline for them to continue participating after the programme finishes.

Likewise, we regularly run reports on our audience demographic to ensure we are reaching our target audience and make adjustments to content policy appropriately if we feel we are deviating away from this.

We publicise an annual report in the form of a video which summarises this information. We also ensure we are documenting programmes and outcomes through video recordings, photography, audio recordings, podcasts and live radio shows.

- 1.2 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.

Our social gain activities are rigorously evaluated by our in-house Projects Team. We record participant and volunteer data on our CPOMS database, which also supports the recording and management of safeguarding data. We have established social gain KPIs in our business plan, and as part of our partnerships/funding agreements with Arts Council England as an NPO and Manchester Council as a Cultural Partner. These KPIs are also reported to our Advisory Board at quarterly meetings.

We have the experience, expertise and resources needed to monitor and evaluate our impact, and have done so for a number of key stakeholders across all of our activities and programmes. We have well developed evaluation processes, embedded from the start of our programmes and projects, and we use this process to measure our impact and success, and to steer future programme development. Our tools and methods include:

Gathering quantitative data for all of our participants and radio contributors, including; demographic monitoring data, to ensure we are reaching and supporting our target groups; self-assessment scales, to measure participants' evaluation of their own skills, wellbeing and confidence progress; attendance and attainment of certificates and qualifications; and progression experienced up to 12 months after our programmes, such as further training and employment gained.

Gathering qualitative data from our participants and communities through; 1:1 discussions, led by our pastoral support team; group evaluation, measuring participant satisfaction and experience; group discussions and forums, gathering people's opinions and experiences, in order to inform programme development; and through case studies, produced with participants to tell their story and journey, better helping us to understand real-life impact.

Documenting programmes and outcomes through video recordings, photography, audio recordings, podcasts and live radio shows. This captures portfolio examples of the skills developed, along with discussions and opinions of participants, and training in-action.

Gathering feedback on the quality of programmes from key stakeholders, including engagement, programme, and employer partners. This feedback is gathered through meetings and reports.

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

English

- 4.9 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.**

## 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:**

SAMUEL JOHN OLIVEIRA

**Date of application:**

09/03/2023

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

company director

**You also need to complete the [confidential section \(Part B\) of the application form](#)**