

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):

Cultural Media Enterprise

Proposed service name:

Unity 101 Community 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)

Southampton Small-Scale DAB Multiplex

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

Rammurthi Kalyan, Cultural Media Enterprise operating as Unity 101 Community Radio, 107 St. Mary's Road, Southampton, SO14 0AN. 07773 713 736 – kelly@unity101.org

Contents

Section

1. Overview	3
2. Applicant's details	5
3. The proposed service	18
4. Compliance of the service	27
5. Declaration	34

1. Overview

You should complete this form if you are applying for a community digital sound programme licence (“C-DSP”). You can find further information about C-DSP services in the [guidance notes for licensees and applicants](#).

This application form is divided into two parts – **Part A** (which we will publish on our website) and **Part B** (which will be kept confidential). This document constitutes Part A; [Part B of the application form](#) is available on our website.

If you encounter any issues using these forms, please contact broadcast.licensing@ofcom.org.uk.

The purpose of this form

You should complete this form if you are applying for a Community Digital Sound Programme (C-DSP) licence.

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.

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.

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.

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).

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

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.

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

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.

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).

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.

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

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

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.

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):

Cultural Media Enterprise

2.2 Company registration number stated on Companies House:

4676684

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:

107 St. Mary's Road, Southampton, SO14 0AN

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

Yes No

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	Rammurti Kalyan
Job title	Project and station Manager
Address	107 St. Mary's Road, Southampton, SO14 0AN
Telephone	07773 713 736
Mobile	07773 713 736
Email	kelly@unity101.org

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

www.unity101.org

2.7 How will the service be financed? If the applicant is receiving, or is likely to receive, any form of funding and/or financial assistance to establish and maintain the service, please provide details of who is providing that funding/financial assistance and the extent of it.

If you are receiving funding from, or on behalf of, a source that could be considered a political organisation or a religious body, you must set out the nature of that organisation here.

As a trusted and well-established community radio station with 19 years of experience, we will fully finance this service through our existing sustainable business model, ensuring long-term viability without reliance on external funding.

Ownership and control of the company which will hold the licence

Details of officers, participants and shareholders of the applicant

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

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Ash Rajput	88 Dunvegan Drive, Lordswood, Southampton, Hampshire, SO16 8DD	United Kingdom	N/A	IT Officer for Southampton City Council
Nidhishkumar Sodha	24 Catmint Close, Knightwood Park Chandlers Ford, Eastleigh, Hants, United Kingdom, SO53 4NT	United Kingdom	N/A	Retired

2.9 Complete the following table, expanding it if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, amounting to more than 5% in the applicant (“participants”). If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

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

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

Comments				

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

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

Full name of the entity	Address
N/A	

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

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

Full name of the entity	Address	Affiliates
N/A		

Details of persons who control the applicant

- 2.12 Complete the following table, expanding it if necessary, to list all persons who control the applicant, together with their affiliates. If any persons or bodies control the applicant jointly because they act together in concert (e.g. because of a shareholder’s agreement), each such person must be identified here:

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

Full name of individual or body	Address	Affiliates
N/A		

- 2.13 Complete the following table, expanding it if necessary, to list all officerships in other bodies that are held by any individual listed in response to question 2.12, and any affiliates of those bodies. An “officership” refers to being a director of a body corporate, designated member

of a limited liability partnership, or member of the governing body of an unincorporated association:

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

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

2.14 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled by any body corporate listed in response to question 2.12, and their affiliates:

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

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

2.15 In relation to each body corporate identified in response to question 2.12, complete the following table, expanding it if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, amounting to more than 5% in the body corporate concerned (i.e. "participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 2.12. If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

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

Name of body corporate identified in response to question 2.11				
Full name of >5% participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
N/A				
Comments				

Involvement of the applicant in specified activities

2.16 Please state below whether the applicant, or any of the directors, shareholders or other individuals named above, including their associates (i.e. directors of their associates and other group companies), is, or is involved in, any of the below, and the extent of that interest.

Activity/involvement	Yes / No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
a) A local authority	No	
b) A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	
c) A body whose objects are wholly or mainly of a religious nature; ²	No	
d) An individual who is an officer of a body falling within (b) or (c);	No	
e) 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	
f) An advertising agency or an associate of an advertising agency	No	

² Please refer to Sections 3 to 5 of [Ofcom's religious guidance note](#) for details on how we determine the eligibility of religious bodies to hold certain broadcasting licences.

Details of applications, licences and sanctions

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

Yes No

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

Licence number	Name of multiplex
CR008	Unity 101 Community Radio

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

Yes No

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

Licence number	Name of service or multiplex
CR008	Unity 101 Community Radio

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 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
08/12/2005 to present	CR008	Unity 101 Community Radio

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

Yes No

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

Licence number	Name of service or multiplex
CR008	Unity 101 Community Radio

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”)?

Yes 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)?

Yes 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?

Yes 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?

Yes 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?

Yes 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 simul-cast 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?

Unity 101 Community 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.

Southampton Small-Scale DAB Multiplex

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 3.2 (or the advertised area for a small-scale radio multiplex service that has not yet been awarded).³

107 St Marys Road, Southampton, SO14 0AN, United Kingdom

³ If you propose to provide your service on a local, rather than a small-scale, radio multiplex service, there is no requirement for your studio to be located within the licensed area of that local radio multiplex service.

- 3.4 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.

Yes. It is linked to Unity 101 Community Radio (Licence Number CR008) and broadcasting on 101.1 FM

- 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.**

Unity 101 Community Radio serves a diverse and multicultural community across Southampton and beyond, reflecting the rich ethnic mix of the region. Our service currently broadcasts in 10 languages—English, Punjabi, Hindi, Bangla, Gujarati, Urdu, Pashto/Dari, African/Caribbean, Chinese, and Polish—ensuring we reach both first-generation migrants and British-born listeners who wish to stay connected to their cultural heritage.

Our current FM service covers the entire Southampton city area (population: approximately 250,000). With this DAB extension, we will be able to offer our existing service to listeners with DAB radios. Our aim is to serve the growing South Asian, African, and European communities, ensuring that Unity 101 remains a future-proof trusted platform for music, discussion, and community engagement.

- 3.6 How will you ensure that your proposed C-DSP service is run on a not-for-profit basis? Please give details of specific measures or arrangements in place to ensure this, and how any profit will be wholly and exclusively used for securing or improving the future provision of the service, or for the delivery of social gain. **Answer in fewer than 400 words.**

We are a limited company with no shareholders, already operating as a fully established Not-For-Profit organisation. We do not employ anyone at any level. Instead, the Project and Station Manager serves as a full-time volunteer, supported by a dedicated team of 70 active volunteers who manage all aspects of the station's operations.

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.

For over 19 years, Unity 101 has been a lifeline for Southampton's diverse ethnic communities, offering content that educates, informs, and entertains. Our impact goes beyond broadcasting—we are an award-winning community platform, receiving the Queen's Award for Community Service in 2012, a testament to our commitment to social cohesion and cultural representation.

We work closely with over 150 partners across public, private, and voluntary sectors, ensuring our programming delivers real benefits to local communities. This includes:

Multilingual public service announcements—ensuring essential information on health, employment, and education reaches non-English speakers.

Youth Engagement Programmes—helping young people from ethnic backgrounds develop broadcasting and media skills, with over 200 volunteers trained in media careers since our inception.

Cultural and Heritage Shows—preserving traditions and languages through music, interviews, and storytelling, creating a home-away-from-home for many listeners.

Making our service available via DAB will further amplify our social impact, reaching more listeners, improving accessibility, and bringing communities together through shared voices, values, and experiences.

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

Unity 101 actively facilitates open dialogue, discussion, and listener interaction, ensuring our community remains informed and engaged.

Key Discussion Programmes:

In The Community Hour (Mon-Fri, 3-4 PM) – Live discussions featuring representatives from the police, NHS, local council, fire service, and educational institutions to address real concerns from listeners.

Community Debates – Featuring local leaders, activists, and cultural figures discussing social issues, education, mental health, and employment opportunities.

Live Phone-Ins & Social Media Engagement – Encouraging real-time listener participation via WhatsApp, Facebook, and Twitter, ensuring that community voices directly shape our discussions.

These programmes serve as a platform for representation, where listeners can voice their opinions, ask questions, and engage in meaningful conversations that impact their lives.

- 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.**

We warmly welcome everyone to join us! Our comprehensive, college-accredited training program spans 30 hours and covers all key aspects of broadcasting, from technical skills and content creation to media ethics and audience engagement.

Through hands-on experience and expert guidance, our volunteers gain the knowledge and confidence needed to produce high-quality, professional, and well-balanced broadcasts.

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

We are committed to maintaining a strong connection with our target audience by actively participating in a wide range of outreach initiatives. This includes hosting our own Unity 101 Radio Shows in and around Southampton, as well as

collaborating with local communities, organisations, and events to extend our reach.

During these engagements, we facilitate meaningful one-on-one conversations, allowing us to gain valuable insights into the needs, preferences, and concerns of our audience. By carefully analysing this feedback, we ensure that our programming remains relevant, inclusive, and reflective of the diverse voices we serve. Where appropriate, we integrate these insights into our daily content and strategic planning, reinforcing our commitment to continuous improvement and community-driven broadcasting.

- 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.**

For 19 years, Unity 101 has been a pillar of community engagement, education, and social impact. Our team consists of dedicated volunteers and professionals with extensive experience in community outreach, training, and education.

We have successfully delivered media training programs, equipping individuals—especially from underrepresented backgrounds—with broadcasting, journalism, and technical skills. Many of our trainees have gone on to secure careers in media.

Beyond broadcasting, we actively collaborate with schools, colleges, and community groups, offering mentorship, workshops, and educational initiatives that promote cultural understanding and personal development.

Our commitment to social gain is evident through health awareness campaigns, governmental updates, and charity partnerships, ensuring that vital information reaches diverse communities in 10 different languages.

Recognised for our impact, we received the Queen’s Award for Community Service in 2012 and continue to be a trusted voice for Southampton’s ethnic communities.

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.**

Unity 101 operates a fully inclusive and volunteer-led structure, allowing members of our target communities to actively shape the station's content, direction, and impact. We provide a clear pathway for volunteers to progress from trainee broadcasters to station coordinators and even managerial roles.

Flexible Involvement – Volunteers can participate at their own pace, whether contributing as radio presenters, content creators, producers, or event organisers.

Leadership Opportunities – Those wishing to take on greater responsibilities are encouraged to step into management roles. We have seen numerous volunteers' progress to senior positions, with many now working in professional broadcasting careers.

Decision-Making & Programming Influence – Volunteers help shape programming decisions via monthly meetings, ensuring our content reflects community needs. Feedback is actively sought through social media, listener polls, and in-person focus groups.

We believe in true representation—our community doesn't just listen; they actively participate and take ownership of their platform.

Accountability

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

You can find us on all major social media platforms, where we actively engage with our audience, share updates, and respond to inquiries. Our landline, Whatsapp number is regularly announced on air, including studio email making it easy for listeners to reach us directly. Furthermore, when you search for "Unity 101" on Google, we consistently appear at the top of the search results, ensuring quick and convenient access to our website and information.

- 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 take all criticism seriously and view it as an opportunity for improvement. Any valid criticism is carefully assessed through a structured decision-making

framework to determine its relevance. It is then further reviewed by the station manager and key stakeholders to ensure a thorough evaluation.

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	Unity 101 Community Radio
Service Description	<p>Unity 101 is a community radio station dedicated to serving the Asian and ethnic communities across Southampton. Located on England’s south coast, Southampton is a dynamic and multicultural city with a significant South Asian population, as well as an increasingly diverse demographic. This rich cultural tapestry makes the city an ideal setting for a community radio station that not only provides entertainment but also fosters cultural representation, inclusion, and community engagement.</p> <p>At its core, Unity 101 is more than just a radio service—it is a platform for voices that might otherwise go unheard. The station is committed to informing, educating, and entertaining its audience through a carefully curated mix of music, talk shows, and cultural programming. By broadcasting in multiple languages and featuring a wide range of perspectives, Unity 101 ensures that its content resonates with different communities, helping them stay connected to their cultural roots while embracing the broader society they are part of.</p> <p>Beyond entertainment, Unity 101 plays a crucial role in promoting social cohesion and integration. Through interviews, discussions, and community-driven initiatives, the station addresses important topics such as local issues, cultural heritage, and social development. It serves as a bridge between different communities, encouraging dialogue, mutual understanding, and shared experiences.</p> <p>By engaging with local businesses, charities, and grassroots organisations, Unity 101 extends its impact beyond the airwaves, actively participating in events, educational programs, and social projects. This commitment to the community strengthens its role as a trusted and valuable resource for Southampton’s diverse population, reinforcing its mission to celebrate cultural diversity while fostering unity and belonging.</p>

Transmission Schedule	24 Hours, 7 days week and 365 days a year.
Multiplex	Southampton Small-Scale DAB Multiplex

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 Regulation of Premium Rate Services Order

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).

Ram Kalyan “Kelly” is the Project and Station Manager of Unity 101, bringing over 40 years of experience in the radio industry, electronics, sound, marketing and management. He has led the station for the past 24 years, continuously updating his skills and Ofcom training. As a licensed broadcaster on 101.1 FM, Unity 101 operates under Ofcom regulations, ensuring high broadcasting standards.

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

As mentioned above, Ram Kalyan Kelly has been the Project and Station Manager of Unity 101 Community Radio for the past 24 years. Unity 101 is an Ofcom-registered radio station, which means Kelly is responsible for ensuring compliance with all relevant Ofcom codes and regulations. This includes adhering to the Broadcasting Code, maintaining accurate records of content, handling listener complaints, and ensuring that all broadcasts meet regulatory standards.

Kelly’s role also requires staying up to date with new compliance measures introduced by Ofcom and implementing any necessary policy or operational

changes to ensure continued compliance. His extensive experience in this role demonstrates his ability to manage regulatory obligations effectively.

- 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.

Project and Station Manager

The Project and Station Manager is responsible for ensuring full compliance with Ofcom regulations and broadcasting standards. This includes overseeing content to prevent rule violations, implementing compliance policies, conducting regular audits, and providing guidance to all team members on regulatory matters. The manager also ensures that all programming aligns with Ofcom's codes, handling any compliance-related issues that arise.

Radio Presenters (Volunteers)

Radio Presenters operate on a voluntary basis and are thoroughly trained in Ofcom regulations to ensure compliance in all broadcasts. They are responsible for adhering to content guidelines, avoiding prohibited material, and maintaining professional broadcasting standards. Presenters receive ongoing guidance to prevent potential breaches and uphold the station's regulatory obligations.

- 4.4 How does the applicant intend to formally train staff in compliance procedures? Please include details of the compliance training that will be given to those responsible for live programming, including compliance staff, presenters and producers.

All applicants are formally trained in compliance procedures through a structured 30-hour accredited college course, which includes comprehensive training on Ofcom regulations. This course covers key compliance areas, including broadcast standards, impartiality, harm and offence, privacy, fairness, and due accuracy.

Those responsible for live programming, including compliance presenters, and producers, and undergo this training to ensure they fully understand their regulatory obligations. Additionally, ongoing refresher sessions and internal workshops will be conducted to reinforce compliance best practices and address any updates to Ofcom guidelines.

- 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, the training described in response to question 4.5 will be mandatory for all Volunteers.

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).

- ☐) 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.

Ensuring Compliance with Ofcom's Codes and Rules During Live Broadcasts.

Unity 101 Community Radio has been a trusted voice in the community for the past 19 years, broadcasting on 101.1 FM while consistently adhering to Ofcom's regulations. As we expand to a DAB platform, we remain fully committed to maintaining the highest standards of broadcasting integrity and compliance.

To ensure that all live content aligns with Ofcom's codes and rules, we have a comprehensive compliance framework in place, covering training, pre-broadcast preparations, real-time monitoring, and post-broadcast review processes.

1. Training and Preparation of Presenters and Guests.

Mandatory Compliance Training: All presenters, producers, and volunteers undergo extensive training on Ofcom's Broadcasting Code, with particular emphasis on accuracy, impartiality, harmful/offensive content, and due impartiality. Regular refresher courses are conducted to keep them updated on any regulatory changes.

Shadowing Program: New team members must shadow experienced volunteers to gain hands-on experience in compliant broadcasting before they are permitted to host live content independently.

Pre-Broadcast Briefings: Before each live show, presenters and producers hold planning sessions to review the content, particularly for sensitive topics. Presenters are provided with clear content guidelines, and guests are briefed on compliance requirements.

2. Live Broadcast Monitoring and Intervention.

Real-Time Compliance Monitoring: A designated compliance officer or producer monitors all live broadcasts, ensuring immediate intervention if any potential breaches arise.

Delay Mechanisms: Where applicable, a short broadcast delay may be used for higher-risk programming, allowing quick intervention before content goes on air.

Clear Escalation Procedures: Presenters and producers are trained to recognise and swiftly address any unintended breaches. If a compliance issue occurs, they follow an established protocol to either correct the content immediately or escalate it to senior management.

3. Post-Broadcast Review and Accountability.

Complaint Handling Process: Any audience complaints regarding compliance issues are logged, reviewed, and addressed promptly, with corrective actions taken as necessary.

Ongoing Compliance Audits: Periodic internal reviews are conducted to assess adherence to Ofcom's regulations, ensuring continuous improvement in compliance processes.

By fostering a culture of compliance, Unity 101 Community Radio guarantees responsible and high-quality live programming, reinforcing our commitment to regulatory excellence and audience trust.

- 2) 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 material, including content sourced from third parties and in-house productions are reviewed and approved by myself as the Compliance Officer before being broadcast. This process ensures full adherence to Ofcom's Broadcasting Code and relevant regulations.

To maintain compliance, we will implement the following procedures:

Pre-Broadcast Review:

Every pre-recorded segment will be assessed against Ofcom's codes, including rules on harm, offence, fairness, accuracy, and impartiality.

Any potentially sensitive or controversial content will be reviewed with extra scrutiny to ensure it aligns with broadcasting standards.

Third-Party Content Verification:

Content sourced from external providers will only be accepted from reputable sources.

A vetting process will be in place to verify that third-party material meets legal and regulatory standards before use.

Editing and Compliance Checks:

Any content that requires modifications to meet compliance standards will be edited accordingly.

All pre-recorded material is and will be archived for reference and potential regulatory review.

Regular internal audits will be conducted to ensure ongoing compliance with Ofcom's requirements.

Through these measures, we are committed to ensuring that all pre-recorded content meets Ofcom's codes and regulations before airing.

- 4.7 Please set out how you will ensure the ongoing delivery/compliance of the **on-air** character of service as set out in the Key Commitments. This should be focused on the content you will broadcast on the station.

In your answer, please ensure you include details on each of the following points:

- a) How you will monitor that the character of service is being delivered;
- b) who will be responsible for monitoring this;
- c) how often will they monitor it;
- d) how you ensure this information is published; and
- e) where the information will be published/made publicly available.

The Project and Station Manager is responsible for ensuring that the station's on-air content aligns with the Key Commitments and maintains the intended character of service. This is achieved through continuous monitoring and scrutiny of the station's output to ensure compliance with core messaging.

Monitoring and Compliance:

- a) The station's content is monitored daily to ensure it adheres to the agreed character of service, covering aspects such as programming themes, diversity of content, and community engagement. This includes reviewing live broadcasts, pre-recorded segments, and audience feedback.
- b) The Project and Station Manager holds primary responsibility for this monitoring, ensuring that all content aligns with regulatory and station guidelines.
- c) Monitoring occurs on a daily basis, with formal reviews conducted weekly or monthly to assess trends, compliance, and audience response.
- d) Compliance and performance updates are documented where necessary and published through periodic reports, highlighting how the station continues to meet its Key Commitments.

e) This information is made publicly available via our newsletter ensuring transparency and accessibility for the audience and stakeholders.

4.8 Please set out how you will ensure the ongoing delivery/compliance of the **off-air** social gain activities as set out in the Key Commitments.

In your answer, please ensure you include details on each of the following points:

- a) How you will monitor that off-air social gain activities are being delivered;
- b) who will be responsible for monitoring this;
- c) how often will they monitor it;
- d) how you ensure this information is published; and
- e) where the information will be published/made publicly available.

Unity 101 is committed to ensuring the ongoing delivery and compliance of our off-air social gain activities, in line with our Key Commitments.

a) Monitoring the delivery of off-air social gain activities

We will systematically track activities such as media training, community engagement programs, educational initiatives, and outreach projects. This will be achieved through structured reporting, participant feedback collection, and regular review meetings to evaluate effectiveness and impact.

b) Responsible personnel

The Station Manager will have overall responsibility for ensuring compliance. They will be supported by the Community Engagement Coordinator and a dedicated team of trained volunteers who oversee and implement individual projects.

c) Frequency of monitoring

We will conduct regularly reviews to assess progress, measure impact, and identify areas for improvement. Additionally, prepare an accountability and continuous development report when requested,

d) Ensuring publication of information

Key findings, project updates, and impact assessments will be compiled. We will outline achievements, ongoing initiatives, and future plans.

e) Where information will be published

To maintain transparency and accessibility, we will as soon as possible on:

The Unity 101 website

Social media platforms (regular updates)

Newsletter

This structured approach ensures that our off-air social gain activities remain effective, measurable, and publicly accessible.

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

We broadcast in 10 languages as mentioned above. English, Punjabi, Hindi, Bangla, Gujrati, Urdu, Pashto/Dari, African/Caribbean, Chinese, Polish.

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.**

Unity 101 is committed to maintaining compliance across all 10 broadcast languages. To achieve this:

Dedicated Compliance Officers for Each Language – Every language group has a fluent compliance officer responsible for ensuring Ofcom's standards are met.

Pre-Broadcast Review & Approval – All pre-recorded content is vetted before airing.

Real-Time Multilingual Monitoring – Live shows are monitored by bilingual supervisors to address issues instantly.

AI-Supported Translations & Compliance Checks – We are introducing AI-assisted compliance tools to cross-check language-specific broadcasts against Ofcom guidelines.

By combining human expertise and technology, we ensure every language broadcast maintains professional and regulatory standard.

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:
- 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;
 - 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
 - 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
 - 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:

ASH RAJPUT (DIRECTOR)

Date of application:

04/03/2025

I am authorised to make this application on behalf of the applicant in my capacity as:
Company director

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