
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):

Birmingham CEDARS Limited t/a Unity FM

Proposed service name:

Unity FM

Radio multiplex service(s) on which the proposed C-DSP service is to be provided:

North Birmingham SSDAB

Public contact details:

Unity FM, The Bordesley Centre, Stratford Road, Birmingham, B11 1AR

Tel: 0121 772 8892 / 0121 772 8795

studio@unityfm.net

Contents

Section

1. Overview	1
2. Applicant's details	4
3. The proposed service	13
4. Compliance of the service	20
5. Declaration	24

1. Overview

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

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

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

The purpose of this form

- 1.1 You should complete this form if you are applying for a Community Digital Sound Programme (C-DSP) licence.
- 1.2 A digital sound programme service intended for broadcast by means of a local or small-scale radio multiplex service requires either a C-DSP licence or a local DSP licence. Ofcom’s published guidance notes set out some of the key issues that potential applicants need to consider in deciding which type of licence is suitable for them. In summary, C-DSP services are not run for financial gain and are required to provide social gain. C-DSP licences therefore include strict conditions to ensure that happens, and provide less flexibility than a local DSP licence. However, they do provide access to capacity that small-scale radio multiplex service providers are required to reserve solely for C-DSP services.
- 1.3 A C-DSP licence will be required even if the same programme service is also provided on any other platforms (e.g. FM, satellite), as separate licences are required for those.
- 1.4 As noted above, small-scale radio multiplex services will have reserved capacity for C-DSP services. Issue of a C-DSP licence does not, however, guarantee carriage on a small-scale (or local) radio multiplex service. That is a matter for agreement between the C-DSP licensee and the multiplex service provider, and there may be more C-DSP licences issued in a locality than there are reserved slots on the small-scale radio multiplex service. Note that a C-DSP service does not necessarily have to broadcast using reserved capacity. It can use unreserved capacity on a small-scale radio multiplex service or capacity on a local radio multiplex service, again subject to agreement with the multiplex service provider.
- 1.5 An application for a C-DSP licence will be accepted only once Ofcom has advertised the licence for the small-scale radio multiplex service upon which the proposed C-DSP service is intended to be provided. There is no closing-date by which an application for a C-DSP licence must be submitted (i.e. it can be submitted at any time after the licence for the relevant small-scale radio multiplex licence has been advertised).
- 1.6 You can find further information about how to determine if a service requires a C-DSP licence in Section 2 of the [guidance notes for applicants and licensees](#).

Provision of information

- 1.7 Ofcom requires complete and accurate information to assess applications. This is so that we can assess your application against statutory criteria, consider whether those involved in the body applying for a licence are ‘fit and proper’ to hold a licence, and determine whether their involvement with other organisations disqualifies them from participation in a licence.
- 1.8 It is an offence under the Broadcasting Act 1996 (as amended) to provide false information or withhold relevant information during the application process, and may be grounds for revocation of a licence subsequently granted.

Publication of information about applications and licensed services

- 1.9 Information provided in **Part A** of the application form will be published by Ofcom following the submission of your application. Information provided in **Part B** will not be published.
- 1.10 In submitting this application you agree that, should a licence be granted, Ofcom may publish contact details for the licensee (specified in Section 2 of Part B of the application form), which may include personal data, on the Ofcom website and/or in other relevant publications. If you have any questions about the information that we publish, or there are any changes to this information, you should contact the Broadcast Licensing team by email (broadcast.licensing@ofcom.org.uk).
- 1.11 Ofcom considers issued C-DSP licences to be public documents and copies of licences will be made available to third parties on request albeit, other than the Key Commitments which are tailored to the service, C-DSP licences are standard form documents. A brief description of the licensed service will be published on the Ofcom website, along with the Key Commitments which form part of the licence.
- 1.12 Ofcom publishes a [monthly radio licensing update](#) which lists new services licensed, licences revoked, licence transfers, and changes to licensed services during the past month.

Data protection

- 1.13 We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom’s [General Privacy Statement](#) for further information about how Ofcom handles your personal information and your corresponding rights.

Keeping up to date with broadcasting matters

- 1.14 We strongly recommend that the appropriate person at the applicant body signs up to receive Ofcom’s regular email updates on broadcasting matters including notification when the Broadcast and On Demand Bulletin is published.

- 1.15 To sign up to receive these communications, you must visit [the email updates area of our website](#) and select 'Broadcasting.'

2. Applicant's details

About this section

In this section we are asking you for details about the applicant company. This must be a body corporate which is not profit distributing.

In the first part of this section, we are asking for basic details about the applicant. These include company registration number and contact information.

In the second part of this section we are asking for details of the applicant's officers (directors or, in the case of LLPs, designated members), its shareholders and participants. Where applicable, we are also asking for details of the officers of the applicant's parent and associated companies or LLPs etc.

If any of the individuals named in your responses are known by more than one name/version of their name, all names must be provided.

Certain persons are disqualified from holding a C-DSP licence. This section asks the questions which enable us to consider this for those types of disqualification which apply specifically to bodies corporate. It also asks questions which are relevant to our assessment of the applicant's fitness and propriety to hold a C-DSP licence.

Before completing this section of the form, you should read [Ofcom's guidance on the definition of 'control' of media companies](#). Throughout this section, "control" has the meaning it is given in Part I of Schedule 2 of the Broadcasting Act 1990.

The response boxes and tables should be expanded or repeated where necessary, or provided in a separate annex.

'Officerships' in this section refers to: directorships of bodies corporate, designated memberships of LLPs, or membership of a governing body of an unincorporated association (including partnerships).

Applicant information and contact details

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

Birmingham CEDARS Limited

2.2 Company registration number stated on Companies House:

05750280

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:

41 Broadway North, Walsall, WS1 2QG

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

Yes/ (delete as appropriate)

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

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

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

Full name	Mohammed Shafiq
Job title	Director
Address	Unity FM, The Bordesley Centre, Stratford Road, Birmingham B11 1AR
Telephone	0121 772 8892
Mobile phone	07977581356
Email	ceo@unityfm.net

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

www.unityfm.net

- 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.

Unity FM is a successful community radio station operating in Birmingham. We submit out accounts to Ofcom annually and currently we have funds in reserve to pay our extension into digital broadcasting.

We do not receive funding from any political source and any profits are used to ensure ongoing improvements and the running of the station, not for any personal gain or profit. In fact, there is considerable voluntary contribution in kind which helps keep costs down.

We have been operating for many years and are financially stable, never having had any financial difficulties which we put down to good financial management. Even in the pandemic we have been able to continue paying staff and have always made prudent financial decisions taken with professional advice.

Ownership and control of the company which will hold the licence

Details of officers, participants and shareholders of the applicant

2.8 Please provide the following details for each director or designated member of the applicant:

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Mohammed Hanif	41 Broadway North, Walsall, WS1 2QG	England	Director: JRM Property Company Ltd - main work: property rental. Director: Avalon Medical Support Services Ltd - providing locum medical services. Trustee Community Concern Charitable Foundation. Trustee Birmingham Central Mosque.	Self-employed Locum GP

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

			Trustee Al-Hijrah Trust CIO	
Mohammed Shafiq	41 Broadway North, Walsall, WS1 2QG	England	Director South Birmingham DAB (applying for South Birmingham SSDAB digital multiplex licence)	NHS Doctor
Mohammed Aflak Suleman	41 Broadway North, Walsall, WS1 2QG	England		Charity Employee
Taruq Hussain	41 Broadway North, Walsall, WS1 2QG	England		Self-employed Driving Instructor

2.9 Please identify any entities with which the applicant is affiliated:

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

Full name of the entity	Address
South Birmingham DAB Limited	41 Broadway North, Walsall, WS1 2QG

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

Full name of entity	Address	Affiliates
South Birmingham DAB Limited	41 Broadway North, Walsall, WS1 2QG	Through its Director and CEO Mohammed Shafiq, Birmingham CEDARS Ltd holds one-third share of South Birmingham DAB, a company established to bid for the SSDAB Multiplex licence in South Birmingham (an application has

		been made to Ofcom but not awarded yet).

- 2.11 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:

Full name of individual or body	Address	Affiliates
N/A		

- 2.12 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 2.11, and any affiliates of those bodies:

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

- 2.13 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 2.11, and their affiliates:

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

- 2.14 In relation to each body corporate identified in response to question 2.11, 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 ("participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 2.11. 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.

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

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

Activity/involvement	Yes or No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
A local authority	No	
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	

A body whose objects are wholly or mainly of a religious nature; ²	No	
An individual who is an officer of a body falling within (b) or (c);	No	
A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	No	
An advertising agency or an associate of an advertising agency	No	

Details of applications, licences and sanctions

2.16 Is the applicant a current licensee of Ofcom?

Yes / (delete as appropriate).

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

Licence number	Name of multiplex
DP101398BA/1	North Birmingham SSDAB trial run by Switch FM
CR000039WT/3	Unity FM, analogue community radio station in Birmingham
CR000039BA/3	Unity FM, analogue community radio station in Birmingham
7/0093310	PMSE

2.17 Has the applicant held an Ofcom broadcasting licence before?

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.

Yes / (delete as appropriate).

Licence number	Name of service or multiplex
DP101398BA/1	North Birmingham SSDAB trial run by Switch FM
CR000039WT/3	Unity FM, analogue community radio station in Birmingham
CR000039BA/3	Unity FM, analogue community radio station in Birmingham
7/0093310	PMSE

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

Yes / (delete as appropriate).

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
2006-current	CR000039	Unity FM, analogue community radio station in Birmingham
2016-current	DP101398BA/1	North Birmingham SSDAB trial run by Switch FM

- 2.19 Does the applicant control an existing Ofcom licensee?

Yes / (delete as appropriate).

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

Licence number	Name of service or multiplex
DP101398BA/1	North Birmingham SSDAB trial run by Switch FM
CR000039	Unity FM, analogue community radio station in Birmingham

- 2.20 Is the applicant 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 / (delete as appropriate).

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

Licence number	Name of service or multiplex
DP101398BA/1	North Birmingham SSDAB trial run by Switch FM
CR000039	Unity FM, analogue community radio station in Birmingham

- 2.21 Has 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** (delete as appropriate).

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

Licence number	Name of service or multiplex

- 2.22 Is 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** (delete as appropriate).

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

- 2.23 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** (delete as appropriate).

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
CR000039	Birmingham CE-DARS Ltd t/a Unity FM	In breach of Rules 2.1 and 4.6 of the Code	no penalty - guidance given	May 2015
CR000039	Birmingham CE-DARS Ltd t/a Unity FM	In breach of Licence Conditions 2(1) and 2(4) of the Schedule to the community radio licence	no penalty - guidance given	May 2015

- 2.24 In relation to any of the directors, shareholders or other individuals named in this application, please provide any information which you think may be a relevant consideration for Ofcom in determining whether or not the applicant is fit and proper to hold a Broadcasting Act 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

- 2.25 Has the applicant – or any person(s) controlling the applicant – ever been convicted of an unlicensed broadcasting offence?

/ **No** (delete as appropriate).

If yes, please provide the following details:

Full name	Date of conviction/action (dd/mm/yy)	Penalty

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. 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.

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 FM

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.

North Birmingham SSDAB trial run by Switch FM, and its successor upon award of the licence.

3.3 Where is your proposed studio located? Please note that this must be located within the coverage area of the small-scale radio multiplex service identified in answer to 5.2 (or the advertised area for a small-scale radio multiplex service that has not yet been awarded).³

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

The Bordesley Centre, Stratford Road, Birmingham, B11 1AR

- 3.4 If the proposed service is a simulcast of an existing licensed radio service, please list that below and provide the licence number.

Unity FM CR000039

- 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.**

Our target community is the Muslim community of Birmingham. Muslims are particularly concentrated within a 3 mile radius of our studio which is located in Sparkhill, Birmingham B11. However, there are Muslims throughout the whole of Birmingham, and the more isolated they are, the more the requirement for a dedicated radio service to connect the community and keep it informed and educated.

An overarching purpose and need for Unity FM, from its inception, was to play a part in improving community cohesion and bettering understanding between people of different faiths, backgrounds, and ways of thinking. Birmingham is a very diverse city and is highlighted often as a place of great cultural and human resource and richness, but also, sadly, very often cited as a place of social discord, inequality, deprivation, and extremism. The need for improving community cohesion is as strong as ever and growing daily and we have very many examples of our contribution to bettering these matters – word constraints do not allow us to list these, but we are very happy to provide any such detail if you wish.

Unity FM provides a service addressing the Muslim community's social, spiritual, cultural and educational needs by providing a forum for discussion, debate, advice and entertainment. It caters for a range of groups and nationalities within this community (and therefore includes programming in a variety of languages), with a particular focus on the needs of women and youth. It aims to enable greater cohesion and inclusion within this community and society in general.

Birmingham is recognised as a super diverse city and a pattern is visible across socio-economic indicators of there being a higher concentration of Muslims in areas with low performance. These factors, combined with fears of extremist preaching and radicalisation (for example the Ofsted and Home Office concerns about radicalisation in Birmingham) are especially worrying. High unemployment, low levels of education, social and economic deprivation, polarised communities and a backdrop of political alienation and growing radicalisation (including far right extremism) make for a dangerous cocktail which can create a fertile environment in which the wrong rhetoric can sound appealing and attractive, especially to young, disenfranchised people. We can provide a balanced, British values-centric, counternarrative of a peaceful religion of tolerance, social engagement, and a force for good that has effectively debated and influenced those negative voices.

- 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.**

Birmingham CEDAR Limited has been running Unity FM on a not-for-profit basis since 2006. We employ the services of a professional accountant and our accounts are submitted to both Companies House and Ofcom annually. We have strict financial protocols in place - no Director of Birmingham CEDARS Ltd receives any income from the company, and no one who receives such an income is allowed to become a Director.

The reason we set up Unity FM was to help, on as much a voluntary basis as possible, the communities we seek to serve. We have always maintained that ethos and continue to do so. We recognise the need to invest in our equipment, staff and resources in order to continually improve the quality of our output and overall offer, but at all times maintain a frugal and responsible financial ethos which has served us well. We do not envisage any financial difficulties in the future if we continue to operate this model.

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.**

Unity FM is an Ofcom-regulated Community Radio station which first started broadcasting in 2006 and has successfully had its licence renewed twice through Ofcom's rigorous licence renewal process. We serve the Muslim population of Birmingham and have over 100,000 of our target audience within our catchment area. The pursuit of social gains for our local community is high on our agenda and reflected in our key commitments. We have broadcast thousands of hours of material in this regard which has included shows on health, education, support for refugees, interfaith programmes, citizenship debates, tackling Islamophobia and discrimination, election specials and local hustings. We take pride in developing shows hosted by women, young people, and members of minority communities. Our strength is from our diversity, and as a testament to this we have broadcasted in nine different languages.

We are currently working with Birmingham City Council, West Midlands Police, Near Neighbours, numerous Mosques, multiple places of worship (churches, synagogues, temples, gurdwaras) as part of interfaith outreach, schools, colleges, and the NHS.

There have been numerous studies looking into the issues affecting the city, including one that Birmingham City Council commissioned which was led by Sir Bob Kerslake – <https://www.gov.uk/government/publications/birmingham-city-councils-governance-and-organisational-capabilities-an-independent-review>

The Supporting analysis can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/390167/Birmingham_Evidence_Pack_for_publication_FINAL.pdf

The Report empirically confirmed many things that the Directors of Unity FM, all of whom have spent most, if not all their lives in the city, already knew and had sought to set up Unity FM to help address. For example, Birmingham has a growing population (it has grown 11% since 2001) which is set to continue to grow and is also very young (46% of the population is under 30 years old.) It is also very diverse with the Pakistani community forming 13% of the population. Sadly, it also has some of the highest unemployment, deprivation, and lowest educational attainment in the country, with some of the most deprived boroughs in the whole country being in Birmingham.

A pattern is visible across these indicators of there being a higher concentration of Muslims in areas that have one or more of the negative variables. These factors, combined with fears of extremist preaching and radicalisation (for example the recent Ofsted and Home Office concerns about radicalisation in Birmingham) are especially worrying. High unemployment, low levels of education, social and economic deprivation, polarised communities, and a backdrop of political alienation and growing radicalisation (including far right extremism) make for a dangerous cocktail which can create a fertile environment in which the wrong rhetoric can sound appealing and attractive – especially to young, disenfranchised people.

Our intention is to provide a counter narrative and seek to present what we consider to be the correct interpretation of Islam as a peaceful religion of tolerance, social engagement, and a force for good. We want to provide a platform where the contribution of Muslims to this country, such as Moeen Ali (raised in Birmingham within our catchment area), can be vocalised and celebrated.

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

We have extensive contact with leaders and opinion-formers in Birmingham and regularly invite them onto our shows where the audience can phone or text in with their questions and comments.

We are completely committed to freedom of expression and ensure regular training which stresses this and all relevant legislation and the Broadcasting Code very strongly.

- 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 have training for members of the public with respect to operating mixer desks and adhering to the Broadcasting Code since 2006. Our Head of Compliance qualified as a solicitor in 2000 and has decades of relevant experience. He is now a non-practicing solicitor with specialist interest in professional compliance and regulation. He is a senior member of the General Medical Council, is Chair of the West Midlands Police Professional Standards Independent Advisory Group and Safeguarding Lead Governor of a Grammar School - all roles in which he advises on complex compliance issues. He has supported radio and television providers for over two decades in professional compliance advice. He personally oversees our training programme, our governance processes, and our compliance processes.

We regularly hold training events, invite people on air to volunteer, undertake joint activity with other organisations and communities to promote Unity FM and the benefits and offers available, hold phone in shows where we encourage involvement and discussion, and have an annual plan of outreach activity to increase access and participation. We have an annual take up of hundreds of people who have availed themselves of this, and over the years this now runs in the thousands. Of course, some are with us for a short term, others for longer.

We have recently taken on an apprentice and hope to do similar things in future to support employment, learning and skills development especially for women and disadvantaged communities.

We regularly advertise on our own radio station for new presenters and also work with mosques and other community organisations to provide opportunities for people to go on air and present their own shows.

- 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.**

One of our aims has been to tackle islamophobia and the negative stereotypes of Muslims which are currently highly prevalent. We have therefore been involved in extensive community outreach and established links with many non-Muslim organisations. We invite non-Muslim guests onto our shows and also have non-Muslim presenters. Within the Muslim community we have been active in strengthening links between diverse mosques and nationalities and speaking out against sectarianism.

We have broadcast hundreds of hours of material in this spirit which has included inter-faith programmes, citizenship debates, election specials, local hustings, theological discussions, phone in shows, panel discussions along the lines of Question Time and many others. Our work has been praised by interfaith leaders from numerous faiths across the city, by West Midlands Police Force (who have hosted and presented many shows over the years), councillors and community leaders, representatives of government departments and many others.

- 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.**

Mohammed Shafiq is a GP who specialises in working with vulnerable populations, especially those who have a problem with drugs or alcohol. He has also been a community activist and youth worker for three decades, with significant experience in some of the UK's most deprived areas such as Toxteth, Handsworth, Sparkbrook and Alum Rock.

Mohammed Hanif is a GP and has been a community activist for over 2 decades and is a trustee of several major Muslim organisations which are working for the betterment of the Muslim community of Birmingham.

Mohammed Aflak Suleman has worked in the Muslim charity sector for nearly 3 decades.

Taruq Hussain has been a voluntary youth worker and community activist for 3 decades.

All of the above have a track record of engaging with the under-privileged in an organised fashion in order to deliver significant improvements.

Participation

- 3.12 How do you propose to ensure that members of your target community(ies) are given opportunities to participate in the operation and management of the service? **Answer in fewer than 400 words.**

We run regular advertisements inviting members of the audience to volunteer as presenters and for other roles, and we provide training to facilitate this. We have regular meetings with all our volunteers where we seek feedback on how to improve the delivery of our services. Volunteers are also invited onto our Board which discusses vision and strategy.

We foster an environment which, from faith principles and honest dialogue, provides especially young people with a safe space to learn, discuss and participate in issues that concern them – hopefully countering the negative rhetoric and making them active, inspired and fully engaged British citizens.

We also pride ourselves on our commitment to equality and especially gender equality. Muslim women are often culturally and socially excluded from traditional societies, which we believe is contrary to Islamic faith teachings that promote the full and proper engagement of women in all spheres of life. We seek to ensure that not only does our programming output ensure this but also our volunteers and the people we engage with reflect this also. Indeed, we believe that over half of the volunteers, presenters and management over the years at Unity FM have been women from all ages and backgrounds including certain ethnic groups that really struggle to find a voice elsewhere.

Accountability

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

Surveys and questionnaires are conducted at public events such as Eid Melas, charity bazaars and concerts where we can get feedback directly from the public. The public can also provide their comments through our website, and by ringing our studio. Our board members also have an extensive community outreach, and we receive informal feedback in this way.

We also utilise billboards, networking with other organisations, sponsorship of charity events, outreach at Schools, Colleges and Universities, work with professional Chaplains in hospitals, prisons and other places amongst many other outreach activities. All of this raises awareness and increases opportunity for private and public accountability. We have a complaints process and regularly invite feedback from all sources.

- 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.**

Suggestions come through to our studio manager who escalates them to the relevant department-in-charge or to the Station Manager. Anything that can't be dealt with is escalated to the Board. We have a complaints policy which details protocols and timescales for handling complaints.

We seek to mediate any individual issues and take on board any longer-term, general advice. Ultimately, our Board considers the merit of a complaint and we have tactical advisers of different backgrounds who can be called upon to help us understand an issue better as well as cultural ambassadors and community advocates. We have developed an ethos of fairness, not causing harm or offence, and at all times seeing to be balanced in our views and undertake activity that promotes goodwill between all communities – any feedback is assessed according to this philosophy and we have an excellent record of responding to complaints/feedback and have not failed to resolve any issue to date.

Draft Key Commitments

Service name: *the on-air name of the programme service (as in question 3.1 of this application)*

Unity FM

Proposed radio multiplex service: *as in question 3.2 of this application, specify if small-scale or local multiplex the radio station plans to broadcast on*

North Birmingham SSDAB

Description of target audience:

The Muslim community of Birmingham

Description of locality, which can be all of, or a subset of, the area covered by the radio multiplex service specified above:

North Birmingham

Brief statement of main purpose of the radio service, its functions/activities: *describe in no more than 50 words*

To inform, educate and entertain the Muslim community of Birmingham with a view to improving engagement and tackling the inequalities that affect the community.

The text below is included in the Key Commitments in all C-DSP licences, and does not need to be amended or augmented. 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.

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).

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:

- the facilitation of discussion and the expression of opinion,
- 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
- the better understanding of the particular community and the strengthening of links within it.

Members of the target community shall contribute to the operation and management of the service.

The service shall have mechanisms in place to ensure it is accountable to its target community in the specific area or locality.

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 Will the individual named as Compliance Contact in response to question 2.3 in Part B have overall responsibility for compliance for the duration of the licence?

Yes/ (delete as appropriate)

- 4.2 Please give details of all compliance training and compliance experience (including dates) the person named in response to question 2.3 in Part B has received in the relevant codes and rules (for example, those referred to in the box at the start of this section).

Our Head of Compliance was admitted as a Solicitor in 2000 and is currently working for a national regulator in a non-practising solicitor capacity. He is also the Director of a company which provides regulatory and compliance guidance and advice to various regulated bodies and in that capacity advises Unity FM. He has advised on the Ofcom Broadcasting Code since its inception and maintains regular updates of the same. He has been providing regulatory and compliance advice on broadcasting matters for over 20 years.

- 4.3 How many staff does the applicant have (or plan to have) in its compliance team? Please provide a brief description of the functions each person will be performing. Please do not give names of individual members of staff.

Head of Compliance – overall management of compliance

CEO – management oversight of compliance.

Programming-in-Charge (will assist in delivering the broadcast training and also provide ongoing monitoring of presenters and their shows)

Vetters – these have been trained by the Head of Compliance and vet all audio that has been sourced from the internet and other external sources to ensure Broadcasting Code compliance. They discuss things on a daily basis with the Head of Compliance as necessary.

- 4.4 How does the applicant intend to 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.

Usually face-to-face half-day training in groups of no more than 10 people, with annual refreshers, and more frequently if necessary.

Most regulation compliance training is done on a one-to-one basis and primarily with the Head of Compliance or trained delegate such as the Programming In Charge and/or Station Manager.

During the pandemic much of the training has been completed virtually.

- 4.5 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 at all times while the service is broadcasting, in particular when the service is broadcasting live content but also when pre-recorded material⁴ is being broadcast.

⁴ This could include, for example, material obtained from, or streamed from, third-party sources as well as content produced by the licensee.

All presenters and producers require training in the Broadcast Code before they can go on air.

The first five shows have to be pre-recorded and run through the compliance team before they can be broadcast. Any issues picked up may result in refresher training, suspension, or exclusion from broadcasting.

If no issues are identified with the first five shows, presenters can do live shows. These are monitored as much as possible by both employed staff and our team of volunteers and Directors.

Any audio sourced externally is vetted prior to broadcast.

There is ongoing spot check unannounced monitoring and refresher training all year round.

- 4.6 Please set out how you will ensure compliance with your Key Commitments, including how you will maintain up-to-date information on how these are being delivered.

Our Head of Compliance and Programming-in-Charge regularly monitor our performance with respect to our key commitments and a weekly report is submitted to the Board with respect to original content hours achieved. The key commitments are also reviewed regularly at Board level.

Our Key Commitments were carefully drafted when initially drawn up and we sought much advice at that time from numerous parties as to what they should be. We have revisited them often and feel that today, some fourteen years later, they are even more relevant than ever.

Throughout our time we have tried our best to deliver each Key Commitment to the best of our ability, often in differing styles, languages and methods. In terms of ensuring how we will achieve this continued level of commitment and service, we can confirm that firstly each member of our Board of Directors still feels passionately about every one of the Key Commitments and embodies that in how the output, staffing and engagement of the station is strategically planned and effectively monitored and evaluated.

Secondly, we ensure that all staff, presenters, partners, and anybody who works with us is equally engaged with the Key Commitments and can prove that they honour and uphold them in all that they do.

Thirdly we ensure that we have regular monitoring and review of how we are upholding and implementing the Key Commitments on a number of governance levels. Daily reviews take place by the Station Manager, weekly team meetings are held, monthly CEO review meetings take place, and Board meetings are at least once every three months. At each level a standing Agenda item is to review how our output and organisational conduct and engagement as a whole is ensuring an honest and effective implementation of the Key Commitments.

We will continue to operate in the above manner, which we trust will ensure full and proper continued delivery of our Key Commitments.

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

We broadcast in mainly English but also Urdu, Bengali, Arabic, Somali, Mirpuri, Farsi, Punjabi, Bosnian, Kosovan [depending upon the availability of Presenters from these communities).

- 4.8 For each language listed in response to question 4.7, 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.

Compliance team consists of:

Head of Compliance (English, Urdu)

Vetter 1 (English, Urdu, Mirpuri, Punjabi)

Vetter 2 (English, Urdu, Mirpuri, Punjabi)

Vetter 3 (English and Arabic)

Vetter 4 (English and Bengali)

Vetter 5 (English and Somali)

All presenters for non-English shows are fluent in English though and can therefore receive regular training from the Head of Compliance and ask questions directly to him.

5. Declaration

About this section

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

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

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

The declaration must also be dated.

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

ence Ofcom's judgement as to whether the directors and any other individuals and/or bodies corporate with substantial involvement in this application are fit and proper persons to participate in a radio licence, have been made known to Ofcom.

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

MOHAMMED SHAFIQ

Date of application:

16/12/20

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

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

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