POLICIES AND PROCEDURES

Including Code of Conduct and Code of Ethics

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ALBANY COMMUNITY RADIO INC

Trading as Great Southern FM

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CBAA – INFORMATION &GUIDING PRINCIPLES

How The Sector Works

- Respect at all times for Volunteers, Members, Clients and Visitors
- Openness, Accountability and Integrity

Our Values

- Respect at all times for Volunteers, Members, Clients and Visitors
- Openness, Accountability and Integrity

Great Southern FM (GSFM) Volunteers will:

Act ethically, with honesty and integrity, in the best interests of GSFM at all times.

Not make improper use of their position to gain advantage for themselves or any other person.

Exercise due care, diligence and use their skills to the benefit of GSFM.

Take individual responsibility to contribute actively in all aspects of the operations of GSFM according to their ability and in keeping with GSFM Policies and Procedures.

Treat other volunteers, members, clients, and visitors with respect, courtesy, honesty and fairness.

Not harass, bully or discriminate against volunteers, members, clients, and visitors.

Great Southern FM (GSFM) Volunteers must not:

Disclose official or personal information acquired through their position with GSFM.

Not make any unauthorised public statements regarding the business of GSFM.

Clarification with GSFM Board will be sought should a potential act of a volunteer be in conflict with the intentions of the Code of Conduct.

CODE OF CONDUCT

OUR VALUES

- Respect at all times for Volunteers, Members, Clients and Visitors
- Openness, Accountability and Integrity

GREAT SOUTHERN FM (GSFM) VOLUNTEERS WILL:

Act ethically, with honesty and integrity, in the best interests of GSFM at all times.

Not make improper use of their position to gain advantage for themselves or any other person.

Exercise due care, diligence and use their skills to the benefit of GSFM.

Take individual responsibility to contribute actively in all aspects of the operations of GSFM according to their ability and in keeping with GSFM Policies and Procedures.

Treat other volunteers, members, clients, and visitors with respect, courtesy, honesty and fairness.

Not harass, bully or discriminate against volunteers, members, clients, and visitors.

GREAT SOUTHERN FM (GSFM) VOLUNTEERS MUST NOT:

Disclose official or personal information acquired through their position with GSFM.

Not make any unauthorised public statements regarding the business of GSFM.

Clarification with GSFM Board will be sought should a potential act of a volunteer be in conflict with the intentions of the Code of Conduct.

CODE OF ETHICS

OUR VALUES

- Respect at all times for Volunteers, Members, Clients and Visitors
- Openness, Accountability and Integrity

VOLUNTEERS

- Shall, in all business conducted on behalf of GSFM, place the interests of the station over their own interests of those of any other person or persons.
- Shall observe the provisions of the constitution, policies, and rules of the station.
- Shall treat the other members of GSFM, the members of the Board and the clients of the GSFM, with respect.
- Shall undertake any training necessary for the performance of their duties.
- Shall, in any work carried out for the station, follow the directions of their designated supervisors.

MEMBERS

- Shall observe the provisions of the Constitution, policies, and rules of GSFM.
- Shall treat the other members of GSFM, members of the Board and the clients of the station, with respect.

BOARD MEMBERS

- Shall, in all business conducted under the aegis of GSFM, place the interests of the station over their own interests of those of any other person or persons.
- Shall observe the provisions of the policies, and rules of GSFM.
- Shall, as far as possible, attend all meetings of the Board and, in the event that they are prevented from attending any meeting, shall notify the Secretary of their absence in advance of the meeting.
- Shall devote to their duties the amount of time required to carry them out thoroughly and effectively.
- Shall undertake any training necessary for the performance of their duties.
- Shall treat other members of the Board, all members of GSFM, and clients of GSFM, with respect.

RELATED DOCUMENTS

⇨ ACR Constitution
⇨ CBAA Community Radio Broadcasting Codes of Practice

GSFM BOARD OF MANAGEMENT CHARTER

Powers And Responsibilities of the Board

The Board of Management is responsible for the performance and viability of GSFM. The role and responsibilities of the Board include:

- Providing strategic direction through:
  - Effective leadership.
  - Oversight, providing input, and endorsing the strategic direction of GSFM
  - Ensuring that management implements Board decisions and approved policies.
  - Providing financial oversight of the current budget and operations including, but not limited to, grants and fundraising.
  - Ensuring good governance by:
  - Ensuring that GSFM has an appropriate corporate governance structure with appropriate accountability, control, and reporting systems in place.
  - Developing and maintaining appropriate financial checks and balances.
  - Monitoring risks.
  - Ensuring compliance with key governance documents, such as the Constitution.
  - Providing oversight of GSFM's operating performance and development by:
  - Reviewing and approving annual budgets.
  - Appoint, employ, suspend, or remove volunteers, and/or contractor/s as may be necessary to uphold the requirements of the Constitution.
  - Investing and dealing with the funds of GSFM appropriately.
  - Ensuring legislative and regulatory compliance with applicable laws and statutes.

Composition of the Board

The Board shall be composed as follows:

- There shall be up to 8 elected members. There shall be four (4) Office-Bearers - Chair, Vice Chair, Secretary, and Treasurer —and, up to four (4) general members.
- The election, membership and management of Board Members is in accordance with the constitution.

Review of the Board

The Board will review its own performance on an annual basis. The review will enable the

Board to:

- assess matters related to the business and strategic direction of the Board
- identify areas where changes need to be made
- maintain a strong sense of teamwork
- foster a better understanding of the Board and the management team's governance responsibilities.

The review will include:

- general strengths, weaknesses, and opportunities for improvement or development
- performance of committees
- performance of the Board as whole
- governance, including compliance.

BOARD MEETINGS

The Board must meet at least three (3) times in each period of 12 months at such place and time as the Board may determine to conduct the business of GSFM (as per the constitution). An annual calendar of regular Board meetings is prepared and approved by the Board in advance.

STANDARD MEETING AGENDA

Agendas are prepared by the Secretary. Board members may add additional agenda items (late items), with the prior approval of the Chair.

Should an item require urgent attention, prior approval from the Chair is required, and then forwarded to the Secretary for processing of an Out of Sessions (OOS) approval.

MINUTES

A written record of all meetings is maintained in accordance with the Constitution. The Secretary
prepares the minutes which include:

- Attendance and apologies recorded for the meeting
- Any conflict of interest raised by the Board Members in relation to any agenda item and
  the action taken to deal with such conflict
- A summary of the discussion of any agenda item or resolution, if required
- Any resolution put forward.

The approved minutes are signed by the Chair at the next Board meeting, filed, and a copy placed on the GSFM office noticeboard. Draft minutes are distributed electronically within ten working days of the meeting. The format for the agenda and other papers is as agreed to by the Board from time to time.

BOARD CODE OF CONDUCT

The purpose of this Code of Conduct is to provide standards for the execution of a Board Member's duties that reflect the obligations and responsibilities of being a member of the GSFM Board.

All Board Members are expected to comply with the Board Code of Conduct.

1. Board Members should act honestly, in good faith, use the powers of office for a proper purpose and in the best interests of GSFM as an organization.

2. Board Members should recognise that their primary responsibility is to GSFM as an organisation, but may, where appropriate, have regard for the interest of all stakeholders, and/or the wider community.
3. Board Members should properly manage any conflict with the interests of GSFM.
4. Board Members have an obligation to be independent in judgment and actions, and to take all
   reasonable steps to be satisfied as to the soundness of all decisions taken by the Board.
5. Board Members shall respect the right of fellow Board Members to express opinions and to have those opinions heard.
6. Board Members acknowledge the role and responsibilities of the GSFM volunteers and will work
   towards ensuring a culture of positive co-operation within the bounds of the separation between governance and operational management.
7. Confidential information received by a Board Member during the exercise of a Board

Member's duties remain the property of GSFM and it is improper to disclose it, or allow it to be
disclosed, unless that disclosure has been authorised by the Board, or the consent of the person by whom the information is provided is obtained or is required by law.

8. Board Members have an obligation to comply with the Board's policies, procedures, and resolutions.
9. A Board Member must notify the Board as soon as practical that they are unable to hold office.

MANAGEMENT OF DISPUTES

Disputes between Board Members can arise from various issues, including disagreements over

management, strategy, poor communication and personal relationships, and can significantly impact

business operations. Board disputes happen when Board Members disagree on critical issues, undermining the organisation's direction. These conflicts take many forms:

- Strategic Clashes: One Board member pushes aggressive expansion while others favour caution.
- Financial Missteps: Accusations of mismanagement or unauthorised spending.
- Fiduciary Breaches: A Board member prioritizes personal gain over the organisation's interests.
- Power Struggles: Personality conflicts or battles for control.

Legally, Board Members are bound by fiduciary duties—acting in the company's best interest, with care and loyalty. Breaching these can spark conflict and liability. Early detection allows action to be taken before the dispute disrupts business.

INTERNAL RESOLUTION STRATEGIES

The first step in resolving disputes should be informal discussions between the involved parties. Open communication often defuses conflicts without external help. If these discussions fail, engaging a neutral mediator can help facilitate a resolution. This professional can guide discussions, focusing on solutions rather than blame.

Litigation is a last resort—it's expensive, public, and divisive. Clearing the air without court action,

can help save the organisation's reputation.

Adopted – Board meeting 21.02.26 item 12.4

CHAIR - MANAGEMENT OF MEETINGS POLICY

Policy Number	1.1	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

It is important to ensure that meetings are conducted well so that:

- in making decisions, proper regard can be had to the views of the majority, of the minority, of individual members, of absentee members, and of all of these groups taken together; and
- decisions can be made efficiently and expeditiously, with due respect for the time and commitment of members of GSFM and members of the Board.

Primary responsibility for this rests with the Chair. To achieve that, broad discretion and authority is given to the Chair to make rulings on questions of meeting procedure (subject to the limitations set out in this policy).

PURPOSE

This policy is designed to provide guidance on the appointment of the Chair and set out the parameters by which the Chair is to conduct meetings, to ensure that meetings are conducted well.

APPOINTMENT OF CHAIR

The Chair of GSFM's Board shall be elected as laid down in the GSFM's constitution.

Subject to anything in the Constitution:

- In the Chair's absence, the Vice-Chair shall preside as Chair at each meeting of the GSFM Board.
- If the Chair and the Vice-Chair are absent from a meeting, or are unable to preside, or decline to preside, the Members present must elect one of their number to preside as Chair.
- Meetings of any Board **committees** shall be chaired in the manner laid down by the Board.
- A person should not preside as Chair over the part of a meeting concerning the election of the Chair, nor should the Chair give instructions as to the procedure to be followed, in respect of an election for the position of Chair. A temporary Chair should be appointed for that purpose to ensure a fair, unbiased election.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

CONFIDENTIAL INFORMATION & PRIVACY POLICY

Policy Number	1.2	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Information management systems rely on any necessary restrictions on the free circulation of information being respected by those into whose hands the information is entrusted.

PURPOSE

The purpose of this document is to provide a framework for GSFM in dealing with confidential information.

POLICY

GSFM collects and manages a range of information for a variety of purposes. Some of this information is restricted in its circulation for commercial, privacy, or ethical reasons.

GSFM will place the minimum of restrictions on the information it holds but will ensure that such restrictions as are considered necessary are observed by its volunteers.

PROCEDURE

RESPONSIBILITIES

GSFM's Board is responsible for the implementation of this policy.

GSFM's Board is responsible for reviewing this policy as and when the need arises.

All volunteers are responsible for observing confidentiality procedures in their workplace.

RESTRICTIONS

GSFM will place restrictions on the information it holds when the information -

- is commercial in confidence;
- concerns the privacy of its members, volunteers, sponsors or clients;
- requires protection to safeguard the intellectual property of the station;
- member register.

In the normal course of business, volunteers may hear or see information which is of a sensitive nature and in respect of such, confidentiality must be maintained (volunteers should not discuss matters in house, but await Board notifications). It is imperative that such information is not divulged to any person outside the station.

PERSONAL INFORMATION ABOUT VOLUNTEERS

The station requires up-to-date address, phone number and/or email address and contact name in case of an emergency. Please notify the Secretary of any changes to this information ASAP. Privacy will be respected and this information will not be used for any other purpose.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

CONFLICT OF INTEREST POLICY

Policy Number	1.3	Version	2
Drafted by	Shelley Pepper, Lynda Mellows	Approved by GSFM Board on	20.06.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM is a community radio station, which relies largely on the efforts of our volunteers to maintain operations. Board members have an added responsibility to manage the affairs of the station, without any conflict of interest – perceived or otherwise.

PURPOSE

The purpose of this policy is to help GSFM to effectively identify, disclose and manage any actual, potential or perceived conflict of interest in order to protect the integrity of GSFM and manage risk.

OBJECTIVE

The GSFM Board aims to ensure that members are aware of their obligation to disclose any conflict of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of GSFM.

SCOPE

This policy applies to the Board members of GSFM, committee members, volunteers, presenters, contractors and any member participating in organisational decision-making processes.

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of GSFM.

Personal interests include direct interests, as well as those of family, friends, or other organisations, a person may be involved with or have an interest in (for example, as a shareholder).

It also includes a conflict between a Board member's duty to GSFM and another duty that the Board member has (for example, to another charity, association, not-for-profit organisation or a business). A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of GSFM. Therefore, these situations must be managed accordingly.

POLICY

This policy has been developed to address any conflict of interest affecting GSFM. Conflicts of interest are common, and they do not need to present a problem to GSFM as long as they are openly and effectively managed.

It is the policy of GSFM**,** as well as the responsibility of the Board, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to GSFM.

GSFM will manage conflicts of interest by requiring Board members to:

- avoid a conflict of interest where possible
- identify and disclose any conflict of interest
- carefully manage any conflict of interest, and
- follow this policy and respond to any breaches.

RESPONSIBILITY OF THE BOARD

The Board is responsible for:

- establishing a system for identifying, disclosing and managing any conflict of interest across GSFM.
- monitoring compliance with this policy, and
- reviewing this policy regularly to ensure that the policy is operating effectively.

GSFM must ensure that its Board members are aware of the ACNC governance standards, particularly Governance Standard 5, and that they disclose any actual or perceived material conflict of interest as required by Governance Standard 5.

IDENTIFICATION AND DISCLOSURE OF A CONFLICT OF INTEREST

Once an actual, potential or perceived conflict of interest is identified, the GSFM member must disclose it as soon as practicable after becoming aware of it and have it entered into the Register of Interests, as well as being raised with the Board.

Note: If all Board members have the same conflict of interest, GSFM must consider whether it is still able to comply with the ACNC Governance Standards, especially Governance Standard 5, while taking reasonable steps to ensure that its Board members are subject to, and comply with, the relevant duties.

GSFM may:

- obtain professional advice,
- consider whether there are any relevant exceptions in its governing document or legislation,
- consider whether it is appropriate for members to pass a resolution in a general meeting,
- consider appointing new Board members; and
- note that its Board members may consider whether they can continue in the role.

Where every other Board member shares a conflict, the Board should refer to ACNC Governance Standard 5 to ensure that proper disclosure occurs.

The Register of Interests must be maintained by the Secretary or another person appointed by the Board. The Register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

CONFIDENTIALITY OF DISCLOSURES

Conflict of interest disclosures will be treated confidentially where appropriate, but may be disclosed to the Board, members, regulators, or others where required by law, the Constitution, or organisational governance obligations.

Action Required to Manage a Conflict of Interest

A conflict of Interest of Board Members

Once the conflict of interest has been appropriately disclosed, the Board (excluding the Board member who has made the disclosure, as well as any other conflicted Board member) must decide whether or not those conflicted Board member/s should:

- vote on the matter, or
- participate in any debate, or
- be present in the room during the debate and the voting.

What Should Be Considered When Deciding What Action to Take

In deciding what approach to take, the Board will consider:

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- GSFM's objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, GSFM. The approval of any action requires the agreement of at least a majority of the Board (excluding any conflicted Board member/s) who are present and voting at the meeting.

The action and result of the voting will be recorded in the minutes of the meeting and in the Register of Interests.

Compliance With This Policy

If the Board has a reason to believe that a person subject to the policy has failed to comply with it, it will/must investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the Board may take action against them. Any person alleged to have breached this policy will be given an opportunity to respond before any decision is made. This may include seeking to terminate their relationship with GSFM.

If a person suspects that a Board member has failed to disclose a conflict of interest, they must report this failure to the Chair, who will discuss this issue with the person in question, notify the Board and the Secretary or another person appointed by the Board, who is responsible for maintaining the Register of Interests, of the outcome of his/her discussions with the person in question.

Related Documents

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

DEFAMATION POLICY			
Policy Number	1.4	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	20.04.24
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM is a community radio station, which relies largely on the efforts of our volunteers to maintain operations. Care should be taken at all times, to ensure no defamatory remarks are made that could affect the station, members and/or volunteers. Liability for defamatory matter broadcast on the Station, would fall on GSFM, the speaker and the scriptwriter. Other people such as the producer might also be involved if they knew the content of the material and could have prevented it being broadcast.

PURPOSE

The policy's purpose is to provide a clear statement about what is defamation, and how it could affect our volunteers and our station.

POLICY

DEFINITION OF DEFAMATION

Broadcasting a statement that is likely to make 'reasonable people' think worse about a person or group may constitute DEFAMATION. The following criteria should be considered -

- An obvious statement which clearly damages a person's reputation (Eg. Mr. Smith is a lying thief);
- A less obvious statement, which contains innuendo or inference, which casts speculation or dispersion on someone's reputation (eg. reading between the lines);
- A statement which contains a special meaning understood by a select few who specific facts which, by being broadcast, may degrade another person. (Eg. an in-joke).

Expressing what is perceived, as the truth for the betterment of the wider community is NOT a safeguard against legal suit. When in doubt consultation with the Board is the only option to be taken by volunteers. Board members must consult the Chair or Program Manager if there is any doubt on their behalf. GSFM will NOT assist in legal fees if these guidelines are not adhered to.

The following defence claims are not acceptable -

- I thought it was the truth (impression/opinion);
- It is a fact (strong rumour/opinion);
- I made a mistake/I didn't mean to hurt anyone;
- I was just repeating what ... said/wrote.

WHEN IN DOUBT, DON'T SAY IT

INJURIOUS FALSEHOOD

Defamation damages someone's reputation while Injurious Falsehood covers "malicious broadcasting of a false statement about trading or activities".

This covers three areas -

- Slander of Goods - attacking the quality of a person's goods;
- Slander of Title - falsely suggesting that someone doesn't own the property;
- Malicious Falsehood - falsely suggesting a person died, retired, ceased to trade, etc.

Truth of the statement is not a defence, unless it can be established that it was published or broadcast for the public benefit.

Defamation is a complex area of law. Even seemingly innocent remarks could give rise to legal action.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

RECORDS POLICY			
Policy Number	1.5	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	20.04.24
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Records are recognised as an important information resource of any organisation. The soundness of record management practices significantly impacts upon the effectiveness and efficiency of the performance of its powers and functions.

PURPOSE

The purpose of this policy is to ensure that GSFM's records be managed in a systematic and logical manner according to the procedures outlined in this policy, which are consistent with all applicable laws.

POLICY

This policy applies to all external and internal records which are handled, received or generated by GSFM, its volunteers, members or contractors, regardless of the physical format or media type of the records.

GSFM is responsible for establishing and maintaining procedures to address the following recordkeeping issues –

- ensure that all recordkeeping is compliant with relevant legal and regulatory requirements;
- protect sensitive or critical information and records from disclosure; and
- protect information and records to ensure continuity of operations.

WHAT IS A RECORD?

A record is recorded information, regardless of its medium or characteristics. It records business decisions, transactions or a state of knowledge and is generated as part of a business process eg: correspondence, electronic documents, forms, electronic messages, plans, photographs, drawings, audio or visual materials etc.

Storage of Records

All GSFM records should be located in the station offices, but if records are taken off site, they must be returned to the office as soon as practical and filed appropriately, to ensure continuity of operations.

It is the responsibility of the Records Volunteer to -

- securely and safely store records either onsite or at a secure storage facility;
- keep an inventory of the records; and
- label storage boxes descriptively.

Digital files must also be maintained securely, backed up regularly, and labelled/named descriptively so that they can easily be found.

EMAIL

Email should be treated like any other electronic or paper record. Email that has significant information should be retained according to the GSFM's needs and retention requirements. Each email user is responsible for retaining email containing important information. Emails that are defined in this Policy as records should be retained with their related records.

VITAL RECORDS

These records are essential to the continuing business of the GSFM. These include those that protect the rights of individuals and GSFM, and are absolutely essential for reconstruction in the event of a disaster.

Vital Records are those which are required to -

- Establish and protect the rights and interests of the organization and its clients;
- Re-instate business operations during or following a disaster; and
- Continue to communicate with, and service the needs of, members following a disaster.

DISPOSAL OF RECORDS

Records are not to be removed from the GSFM's offices unless the records are in the custody of a member performing official GSFM business. All records kept by the GSFM will be disposed of in accordance with the State Records Act 2000.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ State Records Act 2000
- ⇨ Freedom of Information Act 1992
- ⇨ GSFM Confidential Information and Privacy Policy

TRANSPARENCY & ACCOUNTABILITY POLICY & PROCEDURE

Policy Number	1.6	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM values its relationship with its sponsors, its members, its donors, its volunteers and other stakeholders who partner with it to enable it to achieve its purpose.

It recognises that transparency and accountability build trust and help those relationships to flourish.

PURPOSE

The purpose of this document is to recognise the importance of transparency and accountability and facilitate the development and implementation of measures by GSFM's Board and volunteers to provide appropriate transparency and accountability.

POLICY

BOARD REPORTING

The Board must ensure that it complies with its legal and contractual reporting obligations. They include -

- Reporting annually to the Members, in accordance with the requirements of the constitution, on the organisation's activities in the preceding year, and providing an opportunity for questions;
- Preparing financial reports as required by law;
- Reporting to organisations in accordance with the terms of grants and funding contracts;
- Reporting to the Department of Local Government, Industry Regulations and Safety; and
- Reporting to the Australian Charities and Not-for-profits Commission.

In addition to its specific legal and contractual obligations, the Board will consider each year whether there are any other stakeholder relationships which could benefit from receiving a report from the Board on the organisation's activities and performance

PROCEDURE

RESPONSIBILITIES

In order for the Board to facilitate accountability and transparency with stakeholders, there needs to be good internal documentation and reporting.

The Board is responsible for ensuring that there are systems and processes in place to capture, record and analyse the information necessary to enable the Board to perform its reporting functions.

The Board will also ensure that privacy and other policies are in place to govern the access and use of documents including sponsor records, member records, and minutes of meetings, in accordance with the Board's transparency and accountability policy.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Confidential and Privacy Policy

OFFICE PROTOCOLS POLICY			
Policy Number	1.7	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	13.11.21
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM will endeavour to encourage and involve citizens in the broadcast area in the running of the station and broadcasting of programs. We value our relationship with our sponsors, members, donors, volunteers and other stakeholders who partner with us to enable us to achieve our purpose.

PURPOSE

Our Station has a good reputation within the community. We rely on all members to further our good image and to maintain our Station's reputation as one with which we can all be proud to be associated.

POLICY

CONDUCT AND APPEARANCE AT STATION PREMISES

Volunteers are to ensure that their personal conduct whilst in the Station, and particularly while on-air, is of the highest standard. Members are reminded that the use of offensive language is unacceptable both on air and with fellow members. The Station's image depends on its volunteers.

The image projected by all members is very important and dress naturally comes under this category. Neatness and cleanliness are as important as the studio is used constantly by many people each week, and personal hygiene and appearance is important. Apart from normal courtesy, this is an aspect of occupational health and safety that the Association takes very seriously.

Smoking is not permitted anywhere within the grounds/premises of Lotteries House.

HOUSEKEEPING AND SAFETY

It is the responsibility of volunteers and members to assist in keeping the Station clean, tidy and efficient. Cleanliness and hygiene are important, for morale and general health and well-being.

It is also the responsibility of volunteers and members to report unsafe conditions or defective working tools, or equipment to a member of the Board, and ensure prompt attention to correcting same.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

ACCEPTABLE USE OF EQUIPMENT POLICY			
Policy Number	1.8	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

This policy sets out guidelines for acceptable personal use of GSFM equipment by members and volunteers of GSFM.

PURPOSE

The primary purpose for which equipment is provided to GSFM members and volunteers is to assist them in carrying out their duties.

POLICY

GSFM's facilities and equipment are to be used to support its mission. GSFM members and volunteers may not use the organisation's resources (including any person, money, or property) under their control for personal benefit or gain, or for the benefit or gain of other individuals or organisations, except as specified below.

Members and volunteers are permitted limited use of equipment for personal needs where such use does not interfere with GSFM business, involves minimal additional expense to GSFM, involves minimal additional risk to GSFM, and conforms with GSFM procedures.

GSFM believes that members and volunteers should be given the tools needed to effectively carry out their assigned responsibilities. Allowing limited personal use of these tools helps enhance the quality of the station and helps GSFM to retain qualified and skilled members and volunteers.

This policy does not apply to those situations where personal use of GSFM's equipment constitutes agreed remuneration under a contract of employment.

Under no circumstances is the inappropriate use of the station's resources condoned.

Theft may be dealt with where appropriate.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

COMMUNITY PARTICIPATION POLICY AND PROCEDURE

Policy Number	1.9	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	13.11.21
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

The Australian Communications and Media Authority (ACMA) considers that community participation and engagement are the cornerstone of community broadcasting.

PURPOSE

The purpose of this policy is –

- To continuously enhance our community participation activities which assist us to define our place and purpose in the Great Southern community, and to remain community focussed; and
- To present local content including interviewing local people, promoting local music artists, community events and programs relevant to our broadcasting area.

POLICY

As a community radio station, GSFM strives to build community relationships in our licence area and encourage listener participation in all aspects of our operations and programming.

PROCEDURES

COMMUNITY PARTICIPATION ACTIVITIES INCLUDE:

- on-air station promotion seeking members and volunteers in all aspects of our operations;
- website and social media posts offering presenter profiles, program schedules, 'what's on' in the Great Southern;
- website listener feedback seeking comments on GSFM programming, listening patterns and preferences;
- reaching out to community groups to seek participation in programming;
- regular interviews from members of the community promoting not-for-profit groups and events;
- regular interviews with a Representative of the Albany City Council;
- providing on-air Community Service Announcements;
- cultivate an awareness and appreciation of all types of Australian music in the Great Southern;
- special emphasis on fostering local performers in the arts, theatre and music;
- where human resources allow, have a presence in the community events by providing outdoor broadcasts;
- providing on-air entertainment, information and access for the local community;
- Membership of Albany Chamber of Commerce and Industry to liaise with and maintain a relationship with the business community, whilst promoting our place in the community;
- provide the opportunity for the development of professional standards of program production and presentation;
- holding member discussion forums alongside our annual general or other meetings;

- streaming our broadcasts on-line to expand our listening audience and the potential for feedback;
- actively seek listener requests;
- provide a focal point for information concerning access to community services and cater to the diversified needs of our community;
- Not-for-Profit organisations will have access to free programming;
- GSFM will hold Open Days and invite members of the community to visit the studio, observe programs going to air, and enjoy a guided tour of the studios. They will be encouraged to volunteer their services to GSFM in whatever role is appropriate to their skills and interests; and
- GSFM participates in a bi-annual Senior High School Student work experience program thus showcasing community radio to a younger genre and encouraging further participation.

RELATED DOCUMENTS

⇨ ACR Constitution
⇨ ACMA Community Broadcasting Participation - Guidelines

LIFE MEMBERSHIP POLICY			
Policy Number	1.10	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

The Albany Community Radio Inc Constitution, Part l – Preliminary 1 Definitions, defines a "Member" as being a financial member of the Association. However, a number of Members have been granted Life Memberships and the Constitution remains silent on any pre-requisites or guidelines.

Under Part lll Clause 14 (c), of the same Constitution, the Board has the power to perform all such acts and do all such things as appear to the Board to be necessary or desirable for the proper management of the affairs of the Association.

PURPOSE

The purpose of this policy is to provide a clear statement and subsequent guidelines for the oversight of future Life Membership considerations.

POLICY

Life Membership is an honour bestowed on a current financial member, in recognition of his/her contribution through either:

- Length of membership (being 20 years);
- Long term service as a Presenter;
- Considerable work as a Board Member; or
- Considerable work as a volunteer worker.

Life Members are exempt from paying membership fees.

The names of the newly accepted Life Members will be announced at the AGM.

LIFE MEMBERSHIP is NOT an entitlement.

PROCEDURE

- A nomination for Life Membership must be in writing with the support of two financial members;
- Nominations must be addressed to the Chair of the Board;
- The Chair will table any such nominations at a Board meeting and will be supported unanimously by Board members to be successful;
- The Board will refer to the intent of the Policy Statement in making its decision;
- The Board will also consider the current number of Life Members and the impact on the Association.

RELATED DOCUMENTS

⇨ ACR Constitution

⇨ CBAA Community Radio Broadcasting Codes of Practice

ENVIRONMENTAL SUSTAINABILITY POLICY			
Policy Number	1.11	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	13.08.22
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM aspires to minimise its impact on our environment and maximise the effective use of resources. We strive to achieve this by increasing communication and awareness of our efforts in accordance with this policy and fostering responsible environmental behaviour amongst members, volunteers and listeners.

PURPOSE

This Environmental Sustainability Policy aims to integrate a philosophy of sustainable development into all GSFM's activities and to establish and promote sound environmental practice in our operations.

POLICY

GSFM commits itself to minimising its impact on our environment through -

- Providing a safe and healthy workplace;
- Having an environmental sustainability and biodiversity aware culture, where responsibility is assigned and understood;
- Conserving natural resources by reusing and recycling;
- Using, in our own operations, processes that do not adversely affect the environment;
- Ensuring the responsible use of energy throughout the organisation;
- Taking steps to improve environmental performance continually;
- Working with suppliers who promote sound environmental practices, and
- Enhancing awareness among our members, volunteers, and listeners – educating and motivating them to act in an environmentally responsible manner.

RELATED DOCUMENTS

⇨ ACR Constitution
⇨ CBAA Community Radio Broadcasting Codes of Practice

INFORMATION MANAGEMENT - REMOTE ACCESS POLICY			
Policy Number	1.12	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	20.07.24
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM believes that volunteers should be given the tools needed to effectively carry out their assigned responsibilities. Data and metadata held in Information Technology systems needs to be managed with due diligence ensuring security of the data but also allowing access to appropriate volunteers to complete their various tasks.

PURPOSE

The purpose of this policy is to ensure technical (or) and administrative safeguards are firmly in place to avoid security risks to GSFM's information management systems, structures and passwords.

POLICY

GSFMs Technical Team have full authority, access (including remote), and management of all information management systems in the radio station as well as assets on Mt Clarence.

If a volunteer wishes to have remote access to any of GSFM's information management systems, there has to be a clear purpose. A written request will be assessed by the Technical Team, and if supported, will be referred to the Board for final approval. If the volunteer request can be achieved in another way, then access will be denied.

The Technical Team are more than generous with their expertise and time and are ready to assist any requests in that area.

If approval is granted to a volunteer to have remote access, the approval will be reviewed annually.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ Confidential Information and Privacy Policy

SECURITY CAMERA POLICY			
Policy Number		Version	1
Drafted by	S Pepper, G Sutherland	Approved by GSFM Board on	18.07.26
Responsible person	Secretary	Schedule review date	Annual - 2027

INTRODUCTION

Great Southern FM (GSFM) is committed to using security cameras responsibly, in ways that enhance security, deter theft, and ensure the safety of members, volunteers and visitors.

PURPOSE

GSFM is committed to providing a safe and secure environment for members, volunteers, employees, contractors and visitors. This policy outlines the purpose, use, and management of security cameras to ensure safety, protect property, and maintain privacy. This helps maintain transparency and trust within the workplace.

POLICY - SCOPE

This policy applies to all security cameras owned or operated by GSFM, whether located within GSFM's leased premises or in adjacent shared areas where cameras have been installed for legitimate security purposes.

OBJECTIVES

The objectives of this policy are to:

- deter theft, vandalism, and other unlawful activities;
- enhance the safety of members, volunteers, contractors and visitors, and protect GSFM property and assets; and
- support investigations into incidents occurring on the premises.

CAMERA PLACEMENT

Security cameras may be installed:

- within GSFM's leased premises, including studios and reception areas; and
- in shared areas of Lotteries House adjacent to GSFM's premises where this is reasonably necessary to protect the safety of members, volunteers and visitors, or to safeguard GSFM's property and assets. These areas may include building entrances, common access corridors and the adjacent car park.

Camera locations will be selected to minimise unnecessary intrusion into personal privacy while achieving the security objectives of this policy.

Cameras are installed for security purposes only and are not intended to monitor or evaluate presenter or volunteer performance.

Security cameras will not be installed in areas where individuals would reasonably expect privacy, such as toilets, change rooms or other private facilities.

AUDIO RECORDING

GSFM's security cameras record video images only. Audio is not recorded.

RECORDING & STORAGE

- Footage will normally be retained for approximately 60 days before automatic deletion unless it is required for an investigation, legal proceedings or insurance purposes.
- Access is restricted to authorised persons approved by the Board, such as the Secretary, Chair or IT Manager.
- Footage will not be routinely monitored. Recordings will generally only be viewed where there is a legitimate reason to investigate an incident, respond to a complaint, protect GSFM's property or people, or comply with legal obligations.
- Any requests for access to footage by persons other than authorised personnel will be considered by the Board (or delegated officer) in accordance with applicable law and this policy.

USE OF FOOTAGE

Recorded footage may only be viewed or disclosed for legitimate operational, security, safety, legal, insurance or regulatory purposes.

PRIVACY & COMPLIANCE

- Security cameras will be operated in accordance with applicable Commonwealth and Western Australian laws.
- Signage will be displayed to inform people that security cameras are in operation.
- Where recorded footage identifies an individual, it will be treated as confidential information. Footage will be securely stored, access restricted to authorised personnel, used only for the purposes described in this policy, and deleted when no longer required.

BREACH OF POLICY

Any misuse of security camera systems or footage will result in disciplinary action and may lead to legal consequences.

Review

This policy will be reviewed annually to ensure it remains relevant, effective, and compliant with current laws.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Volunteer Disciplinary Policy and Procedures
- ⇨ Surveillance Devices Act 1998 (WA)
- ⇨ Privacy Act 1988 (C'th) where applicable
- ⇨ Fair Work ACT 2009 (if applicable to employees)
- ⇨ Common law privacy obligations

FINANCIAL GUIDELINES

Policy Number	2.1	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	20.06.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

These Financial Guidelines will provide the clarity for the management of financial transactions within the business and ensure all volunteers are aware of such obligations. It brings definite long-term benefits, reduces disputes, and adds to the professionalism of our business.

FINANCIAL GUIDELINES

Prior to any of the following financial transactions being undertaken, the authorising person noted, should authorise the transaction.

Financial Transaction	**Authorised Person**
Bank Accounts	Treasurer
Debit Card	Treasurer, Chair, Vice Chair (two people required to change limit)
Purchasing Supplies	Administration Officer
Purchasing Assets/ Equipment – with prior Board approval	Treasurer, Technical Officer, IT Officer, Administration Officer
Debt recovery - debtors – with prior Board approval	Treasurer
Payment of Invoices	Chair, Vice Chair, Secretary, Treasurer, Nominated member
Petty Cash	Administration Officer

BANK ACCOUNTS

This guideline sets out the requirements for use of bank accounts, including opening, closing authorisation, variations to terms and conditions, reconciliation of bank accounts and bank account transactions.

OPENING BANK ACCOUNTS

Any new bank accounts to be opened for the business should have the authorisation of the Great Southern FM Board.

BANK ACCOUNT AUTHORISATIONS

For monies withdrawn from any bank account, whether by cheque, EFT or other online payment method, there should be **two** signatories authorising for each payment.

The authorised persons for bank account payments are - the Chair, Vice Chair, Treasurer, Secretary and Accountant.

Each payment made is to be supported by invoice, receipt or other appropriate documentation and the authorisations should be attached to this documentation prior to payment.

VARIATIONS TO BANK ACCOUNT TERMS AND CONDITIONS

Any variations to banking arrangements can be made or varied by the Treasurer, with prior approval of the Board. The Treasurer is responsible for updating the financial system and/or bank account register with the new information.

CLOSING BANK ACCOUNTS

Where it is decided that a bank account is no longer necessary, the Board can authorise the closure of the bank account.

The Treasurer will then be required to complete the following -

- ensure all transactions with respect to the account (including cheques drawn) have been completed;
- lodge with the bank a letter, signed by two authorised signatories advising of the closure of the account;
- meet the bank's requirements with respect to account closure; and
- update the financial system and bank account register.

BANK ACCOUNT TRANSACTIONS

Deposits (cash and cheque) received should be banked within five business days from receipt.

DEBIT CARD

The purpose of the debit card is to make small purchases on behalf of GSFM up to an amount of $500.00. Any goods or services purchased on Debit Card should be supported by a receipt and forwarded to the Treasurer.

Note: Exemption -Urgent parts required by Technical Officer or IT Officer may be purchased using debit card, and the limit temporarily increased, with the prior approval of the Chair/Vice Chair/Treasurer.

The Treasurer is to maintain a Record of Debit Card Transactions containing the following details – date, transaction amount, balance, particulars, reference no. The report is to be emailed to our Accountant every few months for updating into our financial management system (MYOB).

PURCHASING GUIDELINES

REQUEST FOR PURCHASE

All purchases for business items (except minor office supplies and consumables; and members expense claims eg: fuel for generator), should be approved by the GSFM Board.

Note: Should an emergency arise, and new technical equipment is required, prior written approval (email) from the Chair/Vice Chair and Treasurer, will suffice, with formal notification being referred to the next Board meeting.

A "Request to Purchase Capital Equipment" form is to be completed and submitted for consideration by the GSFM Board, prior to any approval. Any equipment items over the value of $500.00, should obtain two (2) written quotations.

A request for purchase should address the following criteria -

- purchasing that promotes environmental sustainability;
- value for money; (price and "fit for purpose");
- a preference to Australian/ locally produced. (Support local, where possible). It is noted that much of the station's technical equipment is sourced from overseas, and this requirement would not be applicable.

There will be instances where there may be less than three service providers who stock the required product, and should this occur, it should be detailed on the Request to Purchase Capital Equipment form.

EQUIPMENT ASSET PURCHASES

The Treasurer or nominated person should enter all equipment and asset purchases in the financial system (Asset Register) with the following details included -

- date of purchase;
- supplier;
- make, model, warranty/guarantee information; and
- GST exclusive amount.

RECEIPT OF PURCHASES

Once the receipt has been received, forward to accounts payable for payment of purchase.

CUSTOMER DEBT COLLECTION

This procedure provides guidelines for the collection of late payments from customers.

An Unpaid Invoices Report should be run every month by the Treasurer, and subject to any written arrangements with the customer, the following procedures undertaken until recovery of outstanding amounts.

- **First Contact**: Once the payment is overdue, the Accounts Officer is to phone or email the customer. Remind the customer that payment is due and has not been received. Enquire when the customer intends paying, maintaining a record of the conversation or email. Remember to be polite and professional when dealing with outstanding debtors, they may have forgotten or paid into an incorrect bank account – avoid jumping to the conclusion that they do not intend to pay.
- **Overdue reminder**: If the customer does not respond to the phone call or email, contact another representative of the business. The Accounts Officer should advise the customer as to who you are trying to contact within their organisation. This often results in a return response from either the person you were trying to contact or someone else from the business. Make a note of all conversation details on the overdue customer payment record.
- **Direct contact**: Where there has been no response to the overdue reminder within sixty (60) days, the Treasurer or Accounts Officer is to phone the person who was previously emailed. The purpose of this step is to secure a date of payment. A record of this notice should be entered onto the overdue payment record.

Note: Evidence that the offending customer has been contacted at least three times – one by phone and two by emails with a "read receipt" attached is required, as an audit trail record.

If an account is overdue, the accountant will have already forwarded a statement detailing the outstanding amount.

- Write off debt: Customer payments that remain outstanding for ninety (90) days are to be referred to the GSFM Board for writing off, and with its approval, written off as bad debts.

No future business will be undertaken with the customer (ie: Bad Debtor).

VOLUNTEER RE-IMBURSEMENT

Where a volunteer may have had to pay for a GSFM business expense, they may seek reimbursement for out-of-pocket expenses.

Reimbursement requests should be submitted on the appropriate re-imbursement form, with the appropriate receipt. Approval for payment will be assessed on an individual basis by the Chair, Vice Chair or Treasurer, and **signed off by two authorised officers**.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Assets Policy
- ⇨ GSFM Request to Purchase Capital Equipment form

ASSETS POLICY

Policy Number	2.2	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	20.06.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM owns a range of assets that have been purchased over time to perform the business of the station. This requires GSFM to name, manage and monitor all equipment that is worth more than $500.00.

PURPOSE

This policy describes how GSFM assets will be managed and monitored to ensure due diligence in regard to equipment purchased with members' funds and to allow the station to meet its insurance responsibilities.

POLICY

Assets covered by this policy are classified as -

- Capital assets - those costing more than $500.00 and which have a life expectancy of more than one year;
- Non-capital items – including furniture and fittings.

ACQUIRING ASSETS

All assets must be purchased according to GSFM's financial management and control procedures.

Upon acquisition, the Treasurer must be advised, the asset be recorded in the GSFM asset register and coded according to the specifications above. The Asset Register is maintained by the nominated person in consultation with the Treasurer. All other equipment will be considered consumable items and are not necessarily recorded in this register.

RESPONSIBILITY FOR ASSET REGISTER

The Secretary will be responsible for the Asset Register ensuring that it is established, kept up-to-date, reviewed annually and filed in the GSFM station so that it is accessible.

MONITORING ASSETS

The Secretary and the Technical officer (or nominated person) will conduct an annual audit of assets in the Register and make recommendations to the Board eg: asset replacement (possible grant opportunities). Where possible the audit should reflect the asset's value and remaining useful life.

Where an annual audit of assets reveals a loss or suspected theft, the nominated person shall investigate and refer the matter to the Board.

WRITING OFF ASSETS

Assets can only be written off by authority of the Board

Assets may be written off if they are -

- broken or damaged beyond cost effective repair; and /or
- outdated and can no longer serve the purpose for which they were purchased (eg: old technology - obsolescence).

DISPOSAL OF ASSETS

Where assets have been identified for disposal, they should be -

- offered to members for purchase, or
- offered to the general public for purchase, or
- donated to a reputable charity, or
- disposed of in an environmentally sustainable way (eg: using a recycling centre) wherever possible.

All asset disposal processes must be transparent and conform to ethical principles.

RELATED DOCUMENTS

⇨ ACR Constitution
⇨ CBAA Community Radio Broadcasting Codes of Practice

RISK MANAGEMENT POLICY

Policy Number	2.3	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM will endeavour to minimise the risk any particular operation poses to our station, our members, volunteers, our sponsors, or the general public.

PURPOSE

The purpose of this document is to identify applicable risks and to enable risk management procedures to be satisfactorily identified, organised and maintained.

DEFINITIONS

"Risk" is the probability that an occasion will arise that presents a danger to our station, our members, our volunteers, our sponsors, or the general public. It includes, but is not limited to

- Physical hazards
- Financial hazards
- Reputational hazards
- Legal hazards

POLICY

GSFM has a duty to provide a safe workplace for its volunteers, a safe environment for its sponsors to "invest their money", and a reliable development path for the station. A safe working environment is a workplace that is free from hazards and risks that could cause harm to employees' physical and mental health. It includes proper safety measures, equipment, and protocols to protect workers from accidents and injuries.

GSFM will put procedures in place that will, as far as possible, ensure that risks are minimised and their consequences averted.

Key Components

Key Components

Component	Description
Physical Safety	Ensures that the workplace is free from hazards that could cause injury, such as unsafe machinery or toxic substances.
Psychological Safety	Addresses mental health by preventing workplace bullying, harassment, and stress.
Health Standards	Involves maintaining a clean and healthy environment, including proper ventilation and sanitation.
Emergency Preparedness	Includes having plans and procedures in place for emergencies, such as fires or natural disasters.
Employee Training	Provides workers with the knowledge and skills to recognize hazards and respond appropriately.

Component	Description
Compliance with Regulations	Adheres to local and national health and safety laws to ensure legal obligations are met.

PROCEDURES

RESPONSIBILITIES

It is the responsibility of the Board, to carry out risk management analyses of the station, and to take appropriate measures.

It is the responsibility of the Board to ensure that -

- effective risk management procedures are in place, applicable to all relevant areas;
- risk management procedures are reviewed annually;
- recommendations arising out of the risk management process are evaluated and, if necessary, implemented;
- volunteers are aware of all applicable risks and familiar with the organisation's risk management procedures;
- risk management checklists are reviewed regularly by the Board to ensure that no risks have been overlooked or have ceased to be relevant;
- copies of up-to-date risk management checklists are retained on file.

It is the responsibility of all volunteers to ensure that -

- they are familiar with the station's risk management procedures applicable to their section;
- they observe those risk management procedures; and
- they inform the Board if they become aware of any risk, whether covered by existing procedures or not

MANAGING RISK

The Secretary shall nominate appropriate officers to carry out risk assessment exercises; this will involve -

- identifying the risks attached to every element of their operation and the likelihood of that risk eventuating (see Our Community's Risk Management Help sheets);
- identifying practices to avert those risks;
- identifying practices to mitigate the effects of those risks; and
- recording those risks, those precautions and those remedies in the form of checklists.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice
- Our Community's Risk Management help sheets & checklists

Appendix: A Risk Matrix and Framework

		Catastrophic	Major	Moderate	Minor
Likelihood	Almost Certain	High	High	Medium	Low
	Possible	High	High	Medium	Low
	Unlikely	High	Medium	Medium	Low
	Rare	Medium	Medium	Low	Low

Risk Rating Descriptors

Likelihood	
Almost Certain	Certain to occur/reoccur often in the operation of the station eg; occurs more often than once a year
Possible	Will probably occur at some time eg; once in a one to two-year period
Unlikely	Occurs infrequently eg; once in a three –year period
Rare	Exceptional occurrence eg; occurs in a five+ year period

Risk	Treatment/Action
High	Board action required as a priority
Medium	Action must be taken to eliminate/reduce risk
Low	Manage as per documented policies and procedures

Risk Categories	Inclusions
Finance	Accounting practices to current Australian accounting standards for not-for-profit (NFP) organisations Financial statements/audit Commonwealth and Western Australian Government funding, grants, contracts, taxation and other financial and legal obligations, regulations and standards Board financial practices and experience
Reputation/Brand	Community perception Community engagement Regulatory requirements Outdoor broadcasting and events management Sponsorship Promotion
Infrastructure	People – Volunteers – members/presenters, training Property (including mast), assets, premises, information technology and systems, broadcasting capacity and equipment Safety, environment, emergency procedures Security Governance – policy, procedures, document control, legal obligations, risk management, insurance Broadcasting – licencing, Codes of Practice, law, Australian standards

Likelihood	Consequence
Catastrophic	**Finance:** Financial loss that would result in station closure. **Reputation/Brand:** Adverse publicity/media that results in closure by licenced authority or withdrawal of funding/sponsorship Failure to meet/breach of statutory compliance obligations/requirements eg; Commonwealth/Western Australian legislation, Broadcasting standards and Code of Conduct that would result in loss of licence, litigation, prosecution and/or penalty. **Infrastructure:** Volunteer/visitor accident/incident/event resulting in death. Incident occurring during GSFM outside broadcast or fundraising event requiring claim against GSFM public liability insurance.
Major	**Finance:** Financial loss which cannot be managed by GSFM and requires external agency intervention. **Reputation/Brand:** Complaint regarding the station received via funding or licencing agency requiring significant investigation, loss of GSFM capacity to fulfil broadcasting role. Adverse publicity/media that results in censure from licence or funding bodies. Failure to meet/breach of statutory compliance obligations and requirements eg; Commonwealth/Western Australian legislation., Broadcasting standards and Code of Conduct resulting in sanctions and/or loss of community confidence. **Infrastructure:** Volunteer/visitor accident/incident/event resulting in major injury. Uncontained environmental event requiring evacuation and external support/action.
Moderate	**Finance:** Financial loss that can be managed within allocated budget. **Reputation/Brand:** Complaint requiring investigation by a third party and resulting in negative media attention. Adverse publicity/media that results in enquiry from licence or funding bodies. **Infrastructure:** Volunteer/visitor accident/incident/event resulting in disability requiring intervention/hospitalisation and incurring loss of earnings or increased costs. Recognition of internal procedures that may result in a breach of compliance. Evacuation that can be managed internally.
Minor	**Finance:** Financial loss with minimal financial impact, extraordinary expenditure within existing budget. **Reputation/Brand:** Complaint requiring minimal investigation but resulting in a change of internal policy. Less than favourable publicity/media. **Infrastructure:** Volunteer/visitor accident/incident/event requiring minimal/no medical intervention and incurring no costs or loss of earnings. One off compliance breach managed internally. Environmental event contained within building.

What have you identified as a potential hazard for the organisation?	Likelihood	Severity	Risk Rating	How will this be fixed?	What is required to fix it?	Who will be remedy the problem?	When should this be fixed? (Specify a time and date)	When and who fixed the problem?
(eg; Lights in car park are not working)	B	C	H	(eg; change the light)	(eg; new globe and 4m ladder)	(eg; maintenance officer –Peter Perfect)	(eg; prior to next meeting – 12 July 2002)	(eg; 12 July 2002 by Maintenance officer)

VOLUNTEERS - RIGHTS AND RESPONSIBILITIES POLICY

Policy Number	3.1	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Great Southern FM (GSFM) is a community radio station that relies on the contribution of volunteers to deliver programming and services to the community.

Volunteers participate for a variety of reasons, including:

- contributing to the community;
- developing or maintaining skills;
- social engagement; and
- personal growth.

GSFM is committed to providing **a safe, inclusive, respectful, and rewarding environment** for all volunteers. In return, GSFM expects volunteers to act in good faith and in the best interests of the station and the community it serves.

PURPOSE

This policy establishes a clear framework outlining:

- the rights and responsibilities of volunteers; and
- the rights and responsibilities of GSFM in supporting and managing volunteers.

Principles of Volunteering

Volunteering at GSFM is guided by the following principles:

- Volunteering benefits both the community and the volunteer;
- Participation is voluntary and undertaken without financial reward;
- Volunteers are valued contributors to GSFM's operations and culture.

Definition of a Volunteer

A volunteer is a person who freely undertakes activities for GSFM without financial remuneration.

Rights of Volunteers

Volunteers at GSFM have the right to:

- Be treated with respect, fairness, and dignity in an inclusive environment;
- Be assigned roles suited to their skills, interests, and experience where practicable;
- Receive clear information about GSFM, including its structure, policies, and programs;
- Receive appropriate induction, training, and ongoing support;
- Work in a safe environment that complies with applicable workplace health and safety and anti-discrimination laws;
- Receive reasonable notice of changes that may affect their role;
- Be heard and to provide feedback or suggestions without fear of disadvantage;
- Access appropriate insurance coverage (subject to policy terms and conditions);
- Access grievance procedures and have concerns addressed fairly and promptly;

- Receive recognition for their contribution;
- Receive written reasons for any suspension or termination of their volunteer role.
- Represent GSFM appropriately, including when using social media or other digital platforms.

Responsibilities of Volunteers

Volunteers are expected to:

- Act professionally, honestly, and in good faith;
- Be reliable and fulfil agreed commitments, or notify GSFM if unable to do so;
- Comply with all GSFM policies, procedures, and codes of conduct;
- Adhere to the **Community Radio Codes of Practice** issued by the Community Broadcasting Association of Australia and relevant regulations of the Australian Communications and Media Authority;
- Treat all people with respect, regardless of background, beliefs, or identity;
- Contribute to a safe, inclusive, and non-discriminatory environment;
- Use station equipment responsibly and report faults or hazards promptly;
- Maintain confidentiality where required;
- Keep their contact details up to date;
- Follow all health and safety procedures and report incidents or risks;
- Represent GSFM appropriately, including when using social media or other digital platforms.

Rights of GSFM

GSFM has the right to:

- Expect volunteers to uphold the station's mission, values, and policies;
- Allocate roles and responsibilities based on operational needs;
- Make decisions affecting programming and operations;
- Expect reliability, professionalism, and open communication;
- Require compliance with legal and regulatory obligations;
- Protect confidential information;
- Implement and enforce policies and procedures;
- Suspend or terminate a volunteer's role in accordance with this policy and related procedures.

Responsibilities of GSFM

GSFM will:

- Provide a safe, inclusive, and supportive environment;
- Value and recognise volunteer contributions;
- Provide appropriate roles aligned with volunteer skills and experience;
- Offer induction, training, and development opportunities;
- Provide clear communication about expectations and changes;
- Provide opportunities for feedback and consultation where practicable;
- Ensure volunteers are aware of and able to participate in relevant governance and democratic
- processes (e.g. Annual General Meetings);
- Ensure compliance with applicable laws, regulations, and broadcasting standards;
- Maintain appropriate insurance coverage (subject to policy terms);
- Apply fair, transparent, and consistent processes when addressing concerns or disciplinary matters.

Grievance and Dispute Resolution

Volunteers may raise concerns or complaints without fear of reprisal. GSFM will:

- Handle grievances in a fair, timely, and confidential manner;
- Provide access to a documented grievance procedure;
- Ensure procedural fairness, including the opportunity to respond to concerns raised. (Refer to GSFM Grievance Policy)

Suspension and Termination

GSFM may suspend or terminate a volunteer arrangement where:

- Policies or codes are breached;
- Behaviour is unsafe, unlawful, or inappropriate;
- Operational requirements necessitate change.

Any action will be undertaken in accordance with principles of **procedural fairness,** including:

- informing the volunteer of the issue;
- providing an opportunity to respond;
- considering the response before a decision is made.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ Code of Conduct
- ⇨ Grievance Policy
- ⇨ Community Radio Codes of Practice (Community Broadcasting Association of Australia)
- ⇨ Relevant legislation and regulations (including those administered by Australian Communications
- ⇨ and Media Authority)

WORK HEALTH AND SAFETY POLICY			
Policy Number	3.2	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

This organisation owes a duty to both the paid worker and any volunteers it (or its members) engages. Under the Work Health & Safety Act 2020 (WHS), a volunteer is a person who works for an organisation without payment or financial reward (but they may receive out of pocket expenses). The law also recognises volunteers as workers.

The Department of Mines, Industry Regulation and Safety recommends, even if an organisation is a volunteer association and does not fall under the WHS Act, it is a good idea to comply with general WHS duties.

PURPOSE

As a volunteer organisation, GSFM should ensure, as far as is reasonably practicable, the health and safety of all of its workers, including volunteers. The protection covers the physical safety and mental health of all workers, including volunteers. Then it must do whatever it can—whatever is reasonably practicable, to eliminate or minimise the health and safety risks arising from the work the organisation undertakes.

POLICY

GSFM acknowledges that volunteers should be provided with information, training, instruction or supervision so they can carry out their work safely.

GSFM will consult with workers, including volunteers, so far as reasonably practicable, about WHS matters that affect them. Volunteers will also be given an opportunity to contribute to the identification of hazards and the assessment and control of any risks they face when they carry out their work.

GSFM will inform, consult, and encourage volunteers to contribute on WHS matters, via newsletters and the Office notice board.

Volunteers also have health and safety duties to -

- take reasonable care for their personal health and safety;
- take reasonable care to ensure they do not affect the health and safety of other people, for example, other volunteers, members of the public or clients they may be assisting;
- comply, so far as they are reasonably able, with any reasonable instruction that is given to them by the organisation; and
- cooperate with any reasonable policy or procedure that the organisation has provided to them.

NB: Any officer of an organisation, whether volunteer or paid, has a number of duties, also known as their due diligence obligations. They must exercise due diligence, which cannot be delegated, to ensure that the organisation complies with its health and safety duties ie -

- ensure that the organisation has appropriate systems of work in place; and
- actively monitor and evaluate health and safety management within the organisation.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ GSFM Human Resources Policies

MEMBERSHIP - DIVERSITY AND INCLUSION POLICY

Policy Number	3.3	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

This policy sets out guidelines for GSFM members and volunteers to have a respectful and supportive radio station that enables us to attract and retain a diverse membership that represents our listeners and the local community.

PURPOSE

The primary purpose is to provide a shared direction and commitment for the Association so we can work together to respect and value our diverse membership and build a more inclusive radio station.

POLICY

GSFM is striving to create an inclusive radio station where everyone feels valued and respected because of their differences – a place where every member can be themselves so they can reach their potential and help us achieve our goals. We want our radio station to be innovative and productive so we can deliver the best services to our listeners and we need diversity to help us achieve this.

In our activities and behaviour, we will ensure that people are given the same opportunities as others in similar situations and oppose discrimination on the basis of age, disability, mental ill health, medical conditions, sex characteristics, gender identity or expression, sexual orientation, race, nationality, culture, religion or being from a lower socio-economic community.

All members have the responsibility to maintain an environment that is safe, respectful and productive. Everyone has the right to be treated fairly within the radio station in an environment that recognises and accepts diversity. The success of the policy is dependent upon the support of everyone at GSFM. Everyone has a responsibility for contributing to a culture which supports and values diversity and inclusion.

The more we collaborate and value differences the closer we get to living in a truly inclusive community.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

SEXUAL HARASSMENT POLICY AND PROCEDURE			
Policy Number	3.4	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Every volunteer has the right to perform their role without being subjected to sexual harassment. Every volunteer is responsible for providing an environment that is supportive of this aim. Everyone must treat everyone else with respect.

It is the obligation and responsibility of every volunteer to ensure that the station is free from sexual harassment. Everyone is responsible for the care and protection of our people and for reporting information about suspected sexual harassment.

GSFM is fully committed to its obligation to prevent and eliminate sexual harassment should it occur in the station.

PURPOSE

The purpose of this document is to outline GSFM's position on sexual harassment and to document the process which is to be followed should any grievances arise.

DEFINITIONS

Sexual harassment means any unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances. Examples of sexual harassment include, but are not limited to -

- staring or leering;
- unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching;
- suggestive comments or jokes;
- insults or taunts of a sexual nature;
- intrusive questions or statements about your private life;
- displaying posters, magazines or screen savers of a sexual nature;
- sending sexually explicit emails or text messages;
- inappropriate advances on social networking sites;
- accessing sexually explicit internet sites;
- requests for sex or repeated unwanted requests to go out on dates;
- behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

Behaviour that is based on mutual attraction, friendship and respect is not sexual harassment.

POLICY

GSFM will not tolerate sexual harassment under any circumstances. Responsibility lies with every volunteer to ensure that sexual harassment does not occur.

Both federal and state Equal Employment Opportunity legislation provide that sexual harassment is unlawful and establishes minimum standards of behaviour for all volunteers.

No volunteer should subject any other, volunteer, customer or visitor to any form of sexual harassment.

A breach of this policy will result in disciplinary action, up to and including termination of membership.

GSFM strongly encourages any volunteer who feels they have been sexually harassed to take immediate action. If a volunteer feels comfortable, they can raise the issue with the person directly with a view to resolving the issue by discussion. The volunteer should identify the harassing behaviour, explain that the behaviour is unwelcome and offensive and ask that the behaviour stops.

However, given the seriousness of sexual harassment, we recommend that this discussion happens in consultation with the Chair or another volunteer with whom the volunteer feels as ease.

Alternatively, or in addition, they may report the behaviour in accordance with the relevant procedure. Once a report is made GSFM will determine how the report should be dealt with in accordance with its obligations and this policy.

Any reports of sexual harassment will be treated seriously, promptly, and with sensitivity. Such reports will be treated as completely confidential but the person the subject of the complaint must be notified under the rules of natural justice. GSFM will protect all those involved in the process from victimisation.

Complainants have the right to determine how to have a complaint treated, to have support or representation throughout the process, and the option to discontinue a complaint at any stage of the process.

The alleged harasser also has the right to have support or representation during any investigation, as well as the right to respond fully to any formal allegations made. There will be no presumptions of guilt and no determination made until a full investigation has been completed.

No volunteer will be treated unfairly as a result of rejecting unwanted advances. Disciplinary action may be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment, or against any volunteer who has been alleged to be a harasser.

PROCEDURES

RESPONSIBILITIES

It is the responsibility of the Chair to ensure that –

- they understand and are committed to the rights and entitlements of all volunteers to perform their duties, without fear of being sexually harassed in any form;
- they understand what constitutes an act of sexual harassment;
- all reasonable steps are made to eliminate sexual harassment;
- all volunteers are regularly made aware of their obligations in relation to providing a workplace free from sexual harassment;
- they provide an environment which discourages harassment and victimisation and set an example by their own behaviour;
- they treat all complaints seriously and confidentially; and
- they take immediate and appropriate corrective action if they become aware of any offensive action or illegal behaviour.

COMPLAINT PROCESS

Sexual harassment can be experienced by both men and women. Lack of intent is no defence in sexual harassment cases.

Volunteers who believe they are the subject of sexual harassment should take firm, positive and prompt action.

Where possible, the volunteer should make the perceived harasser(s) aware that they find their behaviour offensive, unwelcome, unacceptable, and that it needs to stop immediately.

If the behaviour continues, or if the volunteer feels unable to speak to the person(s) directly, they should contact the Chair. Alternatively, a volunteer may contact another volunteer with whom they feel comfortable.

INFORMAL INTERVENTION

Informal intervention may be undertaken through a process of mediation or conciliation. During informal intervention the alleged harasser will be made aware of the allegations being made against them and given the right to respond.

This procedure will be complete when the complainant and the respondent come to an agreement on the procedure to be followed.

FORMAL COMPLAINTS PROCEDURE

Formal investigations will be undertaken by a volunteer appointed by the Board. Both parties will be interviewed, and a formal record made of the discussions. A finding is made and a path to resolving the complaint or implementing disciplinary action against the harasser will be determined.

Following an investigation concerning a sexual harassment complaint (irrespective of the findings), the Chair will consult with the parties involved to monitor the situation and their wellbeing.

Records are to be kept and filed in a confidential and secure place.
These records should be kept for a period of fifteen years.

Confidentiality is especially important because, of the sensitive nature of the problem itself and the risk that someone's reputation might be publicly damaged. In all cases, the utmost care will be taken to investigate complaints impartially, recognising the rights of all parties.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Complaints Policy and Procedure
- ⇨ GSFM Bullying Policy and Procedure

BULLYING POLICY AND PROCEDURE

Policy Number	3.5	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	13.11.21
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM has a policy of zero tolerance towards bullying and harassment. It is the right of every individual to undertake their involvement with the Station in an environment which promotes personal satisfaction, maximises program performance and ensures that the reputation of the Station is upheld at all times. Such an environment is dependent on it being free from all forms of harassment and victimisation.

PURPOSE

The purpose of this document is to outline GSFM's position towards bullying and harassment, and to document the process which is to be followed should any issues arise.

POLICY

Bullying includes any behaviour intended to intimidate or embarrass another person. GSFM will not tolerate bullying under any circumstances. All volunteers are responsible to ensure that bullying does not occur.

DEFINITIONS

Bullying is repeated unreasonable action directed toward a member or volunteer that creates a risk to health and safety. Examples of behaviour that could be bullying include -

- excluding someone from activities;
- giving someone the majority of unpleasant tasks;
- verbal abuse;
- humiliating someone through sarcasm or insults; or
- intimidation.

PROCEDURES

If a member or volunteer feels they are being bullied, they should not ignore it and the issue should be brought to the Chair's attention ASAP.

If the member or volunteer feels comfortable doing so, they should address the issue with the person concerned, identifying the bullying behaviour, explaining that the behaviour is unwelcome and offensive and ask that it stop. If the volunteer does not wish to confront the person, the Chair may –

- discuss the issue with the person against whom the complaints made; and/or
- facilitate a meeting between the parties in an attempt to resolve the issue and move forward.

If a complaint is made in writing and is serious, the matter becomes formal and an investigation is undertaken. Formal investigations will be undertaken by a volunteer appointed by the Board.

Both parties will be interviewed and a formal record made of the discussions. A finding is made and a path to resolving the complaint or implementing disciplinary action against the instigator will be determined.

Records are to be kept and filed in a confidential and secure place.
These records should be kept for a period of seven years.

Confidentiality is especially important because, of the sensitive nature of the problem itself and the risk that someone's reputation might be publicly damaged. In all cases, the utmost care will be taken to investigate complaints impartially, recognising the rights of all parties.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice

ALCOHOL & OTHER DRUGS ON STATION PREMISES POLICY

Policy Number	3.6	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM aims to provide a safe and healthy work environment, so far as is reasonably practicable, in which all volunteers and presenters are treated fairly, with dignity and respect. This extends to prohibiting the use of alcohol, drugs (excluding prescription) or any intoxicating substance whilst on station premises.

PURPOSE

The purpose of this document is to outline GSFM's position on the use of alcohol, drugs or any intoxicating substance, when attending the GSFM station, and to document the process which is to be followed should any issues arise.

POLICY

The use of alcohol, drugs (excluding prescription) or any intoxicating substance whilst on station premises is not permitted.

Volunteers and presenters are not permitted to attend or work at the station **whilst under the detrimental influence of alcohol or drugs.** This includes both illegal and prescription or non-prescription medication prescribed by a medical practitioner or purchased over the counter.

Alcohol or drugs may cause alteration of the normal physical or mental function which results in diminished performance, conduct or ability to perform tasks in a safe and productive manner.

Any volunteer or presenter who exhibits impairment as a result of alcohol, drugs or intoxicating substances will be asked to leave the station immediately.

Any breach of this policy will result in instant removal from programming and cancellation of station membership, in accordance with the rules set out by the station.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice
- GSFM Volunteer Disciplinary Policy and Procedures

DISCIPLINARY ACTION AND DISMISSAL OF VOLUNTEERS POLICY AND PROCEDURE

Policy Number	3.7	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Volunteers are an invaluable resource to GSFM and our primary aim is to encourage and support their contribution to our station. However, it is also recognised that there may be times when a volunteer needs to be counselled, disciplined and perhaps dismissed.

We undertake to handle such situations in a professional manner, ensuring communication between our station and the volunteer is clear, fair, objective and remains within the procedures outlined below.

Throughout the process our Board will reflect on its own operations as well as those of the station and will consider the circumstances, actions and behaviour leading to the situation. The process will consider -

- Has the volunteer received training/mentoring and/or coaching related to the performance?
- Has a verbal and written warning been given to the volunteer explaining that any further non-compliance will result in suspension or termination of the volunteering opportunity?
- Did the volunteer have the opportunity to respond to prior verbal and written warnings?

PURPOSE

This document outlines the procedures for disciplinary measures and dismissal. It aims to provide a clear and fair structure that is understandable to both management and volunteers.

The procedure includes an appeals mechanism to ensure a 'right of reply' to a volunteer who has been disciplined.

This document does not include the procedure for expulsion of a member from the Association, which is laid out in the constitution of ALBANY COMMUNITY RADIO INC.

POLICY

Whilst GSFM values its volunteers, a volunteer is expected to act appropriately towards other volunteers and respect the purpose, values and roles within GSFM.

Conduct which may lead to disciplinary action includes, but is not limited to -

- Poor timekeeping and unreliability;
- Not following pre-existing station rules and policies, including programming policies and program briefs;
- Engaging in acts or broadcasts which may breach the Codes;
- Engaging in broadcasts which may breach other related legislation such as the Broadcasting Services Act 1992 (which includes sponsorship provisions), copyright or defamation laws;
- Inappropriate handling or use of station equipment or other property;
- Rudeness or hostility towards other volunteers or members;

- Intoxication through alcohol or other substances during working hours.

Some conduct may be tantamount to 'gross misconduct', in this instance a volunteer may be dismissed without prior warning.

Conduct which may be classed as gross misconduct may include, but is not limited to -

- Verbal or physical harassment of any other volunteer, employee, member or guest of GSFM, particularly in respect of race, sex or religion;
- Wilful damage to, or theft of property, belonging to GSFM or another volunteer, employee, member, or guest of GSFM;
- Falsifications of any of the organisation records for personal gain
- Commercial misrepresentation of GSFM.

PROCEDURES

- The procedure for disciplinary action is a three-step process -
    - First formal notice in writing;
    - Second formal notice in writing;
    - Notice to the volunteer of dismissal from duties.
- For issues that are considered minor, a conversation with the volunteer may be appropriate; however, this will not be considered part of the formal disciplinary action (although it may be referred to in later action). A written record of the conversation will be made, signed by both parties, and retained.
- Written notice will include details of the issue and, where feasible, evidence. In a case where the disciplinary measure has been instigated by a complaint, it may be appropriate to include a copy (with identification removed) or extract of this complaint.
- Further disciplinary actions, such as a suspension of volunteer duties for a period of time, may also be appropriate. In such cases these actions will be included with the formal notice in writing.
- Every effort will be taken to ensure that notice of a disciplinary measure, whether formal or informal, will be given at an appropriate time, e.g.: not immediately prior to, or during a broadcast.
- Notice of a disciplinary measure will be given by a designated Board member.
- Volunteers will be provided an appeal against the action. This may take the form of a meeting with the Board or a representation in person and/or in writing to the Board. The volunteer may bring a representative to any such meeting.
- Where practical, the Board will consider using an Independent Mediator to assist in resolving a dispute, where an agreement or compromise cannot be reached.
- In resolving a dispute, GSFM will consider any internal or external review options available to complainants (including any relevant Ombudsman or oversight regulatory bodies e.g., the ACNC).
- In a case of a volunteer being dismissed without prior warnings as in the case of gross misconduct the volunteer will be provided with an appeal as outlined in the points above.
- Should an appeal result in a change of the disciplinary action, or removal of it, this will be confirmed in writing to the volunteer.

RELATED DOCUMENTS

⇨ ACR Constitution
⇨ CBAA Community Radio Broadcasting Codes of Practice
⇨ GSFM Volunteers – Rights and Responsibilities Policy

COMPLAINTS POLICY & PROCEDURE			
Policy Number	3.8	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM believes that as a community radio station, it is our responsibility to represent community interest of the Great Southern region and the specific community groups operating in this area. As such, any complaints are of great interest to us in helping us to better meet the needs of the community. We must ensure complaints are handled fairly, objectively, confidentially and in a timely manner.

PURPOSE

The purpose of this policy is to outline the most appropriate way for GSFM to respond to both internal and external complaints, and other comments from members of the public.

POLICY

GSFM acknowledges the right of our listeners, members and volunteers to comment and make complaints in writing concerning –

- alleged non-compliance complaints that are about a breach of a Licence Condition or the Broadcasting Services Act 1992
- the requirements outlined in the CBAA Codes of Practice and/or
- internal complaints and disputes.

We broadcast at least one on-air announcement each day that contains information about the CBAA Codes of Practice and where listeners can get a copy. GSFM will make every reasonable effort to resolve complaints.

Please Note: We are not required to resolve a complaint that is deemed by the board to be:

- a) frivolous, vexatious, or an abuse of the complaints process;
- b) offensive or vulgar;
- c) the second or later complaint in a series of complaints from a single person about the same issue; or
- d) expressly indicating that a response is not required.

GSFM will ensure that -

- complaints will be conscientiously considered, investigated if necessary and responded to substantively in a timely manner complaints will be responded to in writing within 60 days of receipt (as required in the Act), and the response will include a copy of the CBAA Codes of Practice
- a recording of any programs that are the subject of a complaint is kept for 60 days after the complaint is received
- any material the ACMA has asked us to keep for a length of time specified by the ACMA; and
- complainants are advised in writing that they have the right to refer their complaint about a Code matter to ACMA provided they have first –
  - formally lodged their complaint with GSFM, and

- received a substantive response from GSFM and are dissatisfied with this response or did not receive a response from us within 60 days after making the complaint. A written complaint or response can be a letter, fax or email.

The record of complaints and responses will be made available to ACMA on request.

1. **Code Complaints**

Complaints that GSFM have breached these Community Radio Broadcasting Codes of Practice should first be addressed to GSFM and will be dealt with in accordance with our Complaints Policy or Procedures.

We will acknowledge receipt of Code Complaints promptly in writing.

Code complaints must:

a) be received within 30 days of the relevant broadcast, if about material broadcast

b) be made via email or letter or by filling in a form

c) contain the name and contact details of the complainant

d) include sufficient detail of the complaint (e.g., date, time, program, and description of the material, which Code alleged to be breached).

We will reply to Code Complaints in writing as soon as is practicable, and at the latest, within 60 Days of receipt of the complaint. Our reply will respond to the concerns raised in the Code complaint and inform the complainant of their right to refer the complaint to the ACMA if they are unsatisfied with our response.

2. **Internal Complaints and Disputes**

Internal Complaints and Disputes and must be dealt with in accordance with our Disciplinary Action and Dismissal of Volunteers Policy and Procedure.

Please note: The ACMA does not have a role in the complaint or dispute resolution process for Internal Complaints and Disputes.

3. **Complaints about a breach of a Licence Condition or the Broadcasting Services Act 1992**

Complaints that are about a breach of a Licence Condition or the Broadcasting Services Act 1992 may be addressed to GSFM or go directly to the ACMA. If addressed to us, we will acknowledge receipt promptly in writing and inform the complainant of their right to complain directly to the ACMA.

PROCEDURE

REPORTING AND RECORD KEEPING

To ensure GSFM can make a full response to ACMA if requested, we will include in our procedures the following steps -

- keep a record of material relating to complaints, including logging tapes or audio copies of broadcast material, and written documentation **for at least 24 months**, including -
  - the date and time the complaint was received
  - the name and address of the complainant
  - the substance of the complaint; and
  - the substance and date of the licensee's response
- the outcomes of the complaint including whether it or any aspect of it was substantiated or dismissed, if it -
  - is frivolous, vexatious, or an abuse of the complaints process

    - is offensive or vulgar
    - is the second or later complaint in a series of complaints from a single person about the same issue; or
    - expressly indicates that a response is not required
- any recommendations made to address problems identified
- any decisions made on those recommendations; and
- any outstanding actions to be followed up, including analysing any underlying causes

Note: We must keep a record of matters relating to a political subject or current affairs for 6 weeks from the date of broadcast, or 60 days if a complaint about the matter is received.

GSFM Complaints Pro Forma

We treat all complaints from the public in a serious and polite manner. We believe that the person would not bother to make the complaint unless they held a genuine interest in the station and felt they had legitimate concerns. We will not be dismissive of their approach to the station. Complainants will be assured that their complaint will be taken seriously and will be dealt with professionally and according to established policy.
NB: Complaints relating to potentially defamatory material will be relayed to your insurance company immediately.

Related Documents

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice
- Broadcasting Services Act 1992
- GSFM Defamation Policy

Great Southern FM Complaint Form

GSFM values complaints as an opportunity for continuous improvement and are committed to providing a safe and effective service to those who wish to make a complaint about us.
In accordance with the Community Broadcasting Association of Australia (CBAA), there are three categories of complaints, namely -

- alleged non-compliance complaints that are about a breach of a Licence Condition or the Broadcasting Services Act 1992
- the requirements outlined in the CBAA Codes of Practice, and
- internal complaints and disputes.

As each category of complaint has a clear set of guidelines to ensure your complaint and/or concerns are appropriately managed, we have separated these into separate headings for your reference.

1. Complaints about a breach of a Licence Condition or the Broadcasting Services Act 1992

Complaints that are about a breach of a Licence Condition or the Broadcasting Services Act 1992 may be addressed to us or go directly to the ACMA. If addressed to us, we will acknowledge receipt promptly in writing and inform you of your right to complain directly to the ACMA.

2. Code Complaints

Complaints that we have breached these Community Radio Broadcasting Codes of Practice, should first be addressed to us and be dealt with in accordance with our Complaints and Disputes Policy and Procedure. We will acknowledge receipt of Code Complaints promptly in writing.
Code Complaints must:

a) be received within 30 days of the relevant broadcast, if about material broadcast;

b) be made via email or letter or by filling in a form;

c) contain the name and contact details of the complainant; and

d) include sufficient detail of the complaint (e.g., date, time, program, and description of the material, and which Codes of Practice alleged to be breached).

We will reply to Code Complaints in writing as soon as is practicable, and at the latest, within 60 Days of receipt of the complaint. Our reply will respond to the concerns raised in the Code Complaint and inform you of your right to refer the complaint to the ACMA if you are unsatisfied with our response.

3. Internal Complaints and Disputes

The ACMA does not have a role in the complaint or dispute resolution process for internal complaints and disputes.
Internal complaints and disputes and must be dealt with in accordance with our Disciplinary Action and Dismissal of Volunteers Policy and Procedure.
This Policy and Procedure will:

a) where practical, include the option to consider using an Independent Mediator to assist in resolving the dispute, where an agreement or compromise cannot be reached.

b) direct us to any internal or external review options available to complainants (including any relevant Ombudsman or oversight regulatory bodies e.g., the ACNC).

Nature of Complaint

Please provide details related to your complaint and/or concern.

……
……
……
……
……

Program associated with complaint (if applicable):

……
……

Date and Time of Program Broadcast (if applicable):

……
……

Name: (please print)

……..

Address: ……

Telephone: (H)……. (Mob)……

Office Use Only

We will reply to Code Complaints in writing as soon as is practicable, and at the latest, within 60 Days of receipt of the complaint. Our reply will respond to the Complaint and inform you of your right to refer the complaint to the ACMA if you are unsatisfied with our response. We will keep a recording of any programs that are the subject of a complaint for 60 days after the complaint is received.

The appropriate contact person at the GSFM station

Name: ……
Date: …….

ACTION Y/ N DATE ……. Receives the verbal complaint
NOTES: Receives the formal complaint in writing Y/N Date……
NOTES: Checks the logged program material (and keeps the log for 60 days from date of complaint) Y/N Date……
NOTES: Sends written station response to complainant Y/N Date……
NOTES: Organises follow-up with complainant (eg: meeting) Y/N Date……
NOTES: Provides contact details for ACMA to complainant Y/N Date……

Contact Details for ACMA are as follows:

Community Broadcasting Group Australian Communications and Media Authority PO Box Q500, Queen Victoria Building Sydney NSW 1230 Fax: (02) 9334 7799 Email: communitybroadcasting@acma.gov.au

Result: The complaint is resolved / unresolved

Details of decision – to include any recommendations made to address problems identified; any outstanding actions to be followed up, including analysing any underlying causes

……
……
……
……

Name of station representative:

……..Position:

……..Signed:
……Date:

SOCIAL MEDIA POLICY

Policy Number	3.9	Version	1
Drafted by	S Pepper/ K Suggate	Approved by GSFM Board on	21.02.26
Responsible person		Schedule review date	November 2031

INTRODUCTION

GSFM supports participation in and promotion of its activities on social media while remaining mindful of protecting members of the station community, the station's image and reputation, confidential information, and intellectual property.

PURPOSE

This policy ensures that GSFM maintains a secure and risk-appropriate information environment, enabling the station to achieve its social media objectives responsibly and in line with organisational values.

POLICY

AUTHORISATION

- Only the GSFM Marketing Committee and/or a person officially nominated and approved by the Committee may set up and manage official social media accounts.
- The Marketing Committee determines which social media channels are appropriate for GSFM use and what accounts to set up
- All social media accounts set up by GSFM remain their asset regardless of who sets them up. Any social media account created and linked to GSFM by identity, either in name or branding, is deemed an asset of the station.
- The Marketing Committee is responsible for documenting and maintaining a log of all social media accounts and the required information for access.

RESPONSIBILITIES OF THE MARKETING COMMITTEE AND/OR NOMINATED PERSON

- Maintain all official GSFM social media accounts. Post content for publicity or promotional purposes.
- Ensure the GSFM logo or images are not used on third-party channels to promote or endorse any product, cause, political party, or candidate.
- Monitor social media channels and remove comments that involve discrimination, bullying, trolling, defamation, or other harmful behaviours to maintain a safe and respectful online environment
- Restrict or request the removal of any social media account or content that violates this policy.

CONTENT GUIDELINES

All social media content and comments linked to GSFM must comply with the station's **Code of Conduct** and other relevant policies. Content must also adhere to the following:

DO:

- Ensure content is relevant, accurate, on-topic, and not misleading.
- Maintain constructive and respectful communication.
- Avoid arguing online; transition disputes to private channels.
- Report unlawful content (e.g. hate speech, threats) to marketing lead.
- Report any accidental disclosure of company information immediately to the marketing lead.
- Use proper spelling, grammar, and clear messaging.
- Comply with all applicable laws, including privacy, anti-discrimination, and defamation regulations.

- Make best endeavours to comply with copyright requirements and acknowledge content creators where practicable. Where attribution information is not supplied and time constraints apply, content may be published in good faith, with any issues to be corrected or content removed if a concern is raised.

DO NOT:

- Use obscenity, expletives, or vulgarity.
- Post content that is abusive, threatening, off-topic, misleading, or degrades into personal attacks.
- Post personal information about volunteers, or members without consent.
- Share confidential operational information of GSFM on social media.
- Remove comments unless they violate community standards or policy.
- Use any form of hate speech.

BRANDING

All official GSFM social media accounts must:

- Reflect our brand personality and comply with the GSFM Style Guide.
- Do not alter brand assets without permission.
- Use approved hashtags and campaign tag lines where applicable.
- Clearly indicate they are maintained by GSFM.
- Display GSFM contact information prominently.

MONITORING AND REPORTING

- Any inappropriate or illegal representation of GSFM on official accounts must be reported to the Marketing Lead.
- All official accounts are subject to review and monitoring at any time by the Marketing Committee for brand consistency, content appropriateness, and policy compliance.

ENFORCEMENT

- Violation of this policy may result in restriction of access, content removal, or further action as determined by the Marketing Committee in line with station procedures.

INCIDENT RESPONSE

Do ***not*** publicly respond to aggressive or hostile comments without guidance.

- Escalate potential crises to the Marketing Committee lead immediately.
- Only authorised spokespeople may make official statements.
- Acknowledge issues quickly and transparently when appropriate.

PERSONAL SOCIAL MEDIA USE

- Members, volunteers, and contractors must **not use their personal social media accounts to represent or**
- speak on behalf of GSFM without explicit authorisation from the Marketing lead.
- Personal posts about GSFM activities should clearly indicate that the views expressed are personal and do not reflect the official position of the station.
- Sharing official GSFM content on personal accounts is permitted, provided it does not misrepresent the station or its policies.
- When referencing the company or its services online, members must be accurate,

respectful, and refrain from sharing any confidential information. GSFM reserves the right to monitor compliance and take action, if necessary.

SCOPE

This policy applies to:

- All members of the GSFM community, including volunteers, service providers, contractors, and visitors participating in GSFM business or activities.
- Any social media channel that hosts content owned or managed by GSFM, including but not limited to X (Twitter), Facebook, Instagram, YouTube, LinkedIn, Snapchat, Yammer, TikTok, Tumblr, WeChat, and Weibo.

DEFINITIONS

Social media — Online or interactive platforms that facilitate creation and sharing of content, including text, audio, images, and video. Examples include Facebook, Instagram, X, LinkedIn, YouTube, Spotify, Apple Podcasts, Google Podcasts, and other forums.

Media — Traditional media including printed publications, television, radio, and online news sites.
Media comment — Responses, interviews, or expert comment provided to the media outside of formal media releases.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice

PROGRAMMING POLICY AND PROCEDURE			
Policy Number	4.1	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

GSFM endeavours to provide a high-quality media service which reflects the needs of the local community, and for which GSFM licensing requires.

PURPOSE

Programming decisions will be made based on GSFM's strategic plan, on suitable program proposals and on feedback from listeners results of surveys and available data about the demographic in our listening area

POLICY

All material broadcast shall comply with -

- all legal requirements under the Broadcasting Services Act 1992 (Cwth), and
- Codes of Practice as developed by the Community Broadcasting Association of Australia (see Community Standards and Legal Obligations).

At the time of writing this policy, Presenters at GSFM may develop their own playlists keeping the community in mind. To that end listener requests should be included.
CBAA Codes of Practice requires GSFM programs to play at least 25% Australian content unless exempted by the Board.
In compliance with our broadcasting licence, an audio log of every broadcast is to be captured and retained for a period of six weeks (42 days) from the date of broadcast. If a complaint has been made against the station, the audio log is to be retained for provision to ACMA for 60 days or until the matter has been resolved, or longer in special circumstances as ACMA directs.
For the purposes of a program, a guest is someone who appears on a program for a segment and plays no part in the format of the show or its content. A segment can be a one off segment or a monthly segment. If a person does more than this, they become a co-host and require the necessary training and information required to be an on air announcer. This includes being a member of GSFM.
GSFM can play a vital role in broadcasting emergency information. This is picked up from BOM notices, Great Southern Police announcements on Face Book, and liaison with Council, and regional and essential services.

COMMUNITY STANDARDS AND LEGAL OBLIGATIONS

We will not broadcast material that may -

- incite, encourage, or present for its own sake any violence or brutality;
- mislead or alarm listeners by simulating news or events;
- present as desirable the use of illegal drugs, the misuse of tobacco or alcohol as well as other harmful substances;
- promote or encourage harmful or excessive gambling;

- promote gambling, gambling information (other than prevention or support information) or gambling live odds immediately before, during, or immediately after sporting events;
- glamorise, sensationalise, or present suicide as a solution to life problems. In particular, broadcast material should not provide explicit details about the method and/or location of a suicide attempt or death.

We will attempt to avoid censorship where possible. However, in our programming decisions we will consider our community interest, context, degree of explicitness, the possibility of alarming the listener, the potential for distress or shock, prevailing Indigenous laws or community standards and the social importance of the broadcast.

We will not broadcast material that expresses, provokes, or perpetuates hatred, serious contempt or significant ridicule of any person or group of persons because of age, disability, mental ill-health, medical conditions, sex characteristics, gender identity or expression, sexual orientation, race, nationality, culture, religion or being from a lower socio-economic community.
This requirement does not prevent the legitimate presentation of factual material, a fair report of, discussion or a fair comment on, a matter of public interest or material that is humorous, satirical, artistic or dramatic in nature. When assessing context, including in relation to the assessment of complaints, factors to be considered will include the nature of the content including its genre, subject matter and editorial purpose, and our community interest.
We will have programming practices that protect children from harmful material but will avoid concealing the real world from them, without giving reasonable warning. We will also exercise special care before using material relating to a child's personal or private affairs in the broadcast of a report of a sensitive matter, concerning the child.

We will follow applicable privacy laws by -

- respecting people's legitimate right to protection from unjustified use of material which is obtained without consent or through an invasion of privacy
- only broadcasting the words of an identifiable person where -
  - there is a clear public interest reason for the material to be broadcast; or
  - that person has been told in advance that the words may be broadcast, or
  - it was clearly indicated at the time the recording was made that the material would be broadcast, or
  - the person has provided informed consent, whether explicit or implicit, for the material to be broadcast (or in the case of a person under 16, a parent or guardian has given implicit or explicit consent).

News, current affairs, including news updates and promotions, documentaries, feature programs and interviews shall -

- provide access to views not adequately represented by other broadcasting sectors;
- present factual material accurately and ensure that reasonable efforts are made to correct substantial errors of fact as quickly as possible;
- clearly distinguish factual material from commentary and analysis;
- present news in such a way that it does not create public panic or unnecessary distress to listeners; or
- represent viewpoints fairly without having a misleading emphasis, editing out of context or withholding relevant and available material.

PROCEDURE

To ensure that GSFM provides a high-quality media service which reflects the needs of the local community, and for which GSFM licensing requires.
We attempt to reach the widest audience possible through our programming decisions, which includes -

- providing a high-quality music facility with a wide range of genres;
- providing local weather coverage and national news coverage;
- ensure the programs are relevant to the community;
- enhance the community's choice of programs and viewpoints; and
- increase community involvement in our broadcasting.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Music Policy
- ⇨ GSFM First Nations Engagement and Programming Policy,
- ⇨ GSFM Diversity Independence and Our Community Policy

MUSIC POLICY			
Policy Number	4.2	Version	4
Drafted by	Shelley Pepper	Approved by GSFM Board on	16.05.26
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

As a community radio station it is important to support new, local, independent, and particularly, Australian music. We are in a unique position to play and engage with a broad range of musical styles.

PURPOSE

The purpose of this policy is to ensure that Great Southern FM -

- continues to play a diverse range of music throughout its programming;
- supports local musicians; and
- complies with CBAA Codes of Practice by playing at least 25% Australian music content across all general programming over a calendar month.

POLICY

Presenters are encouraged to provide a wide range of musical styles (excludes Heavy Metal music) while taking into account that GSFM is community-based and broadcasting in the Great Southern. Programs will endeavour to ensure that, over a calendar month, of the total music played throughout a program, is at least 25% Australian music unless –

- The program aim is to focus on music or culture other than Australian e.g. the Dutch program; or
- The musical style of a program is of a nature that does not have a high instance of Australian recordings.

In the above two cases prior approval must be given by the Programming Committee to qualify for an exemption. This approval must be referred to the Board and the appropriate Register updated for record keeping requirements.

It should be noted that while bad language is prevalent in society, GSFM presenters should be conscious of not only the age range of our potential target audience, but also the relevant program timeslot, when considering the use of music containing such language.

To help clarify this grey area, presenters are not to play music with bad language before 7.00pm and a language warning must be aired immediately prior to anything that may offend after that time.

All Australian CDs that are the property of GSFM are visibly identified as Australian and are available for use in the CD library. AMRAP can be used to source Australian music free-of-charge.
Unless an exempt program, Presenters are required to complete and hand in after each program, a music log of all tracks played indicating which ones are Australian. These logs will be recorded and audited monthly. It may be necessary to re-visit the content of a program that is not meeting the 25% quota.
Presenters are encouraged to promote local musicians and events where local musicians are featured.

To maintain the integrity, consistency, and reliability of GSFM's playout system, access to music loading is restricted to a single designated role: the Programming Technician.

GSFM will not accept any form of payment in cash or in-kind, in return for providing airplay or promotion of a business, except under standard sponsorship arrangements.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice

SPONSORSHIP POLICY			
Policy Number	4.3	Version	3
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Under the Broadcasting Services Act 1992 (BSA) community broadcasters are not permitted to broadcast 'advertising'. Sponsorship, however, is permitted and this is akin to a limited form of advertising. The BSA outlines three key requirements of a sponsorship announcement -

- Sponsorship content will be limited to five minutes in any hour (Broadcasting Services Act 1992 Sch 2, Part 5 clause 9 (3));
- Every sponsorship announcement will be clearly "tagged" (Broadcasting Services Act Sch 2, Part 1, clause 2 (2) b);
- There must be a bona fide financial relationship between the sponsor and the station or program.

In line with the Community Broadcasting Codes of Practice, GSFM will ensure that -

- sponsorship will not be a factor in determining access to broadcasting time;
- the content and style of individual programs is not influenced by the sponsors of programs; and
- overall programming of community broadcasting stations is not influenced by sponsors.

PURPOSE

The purpose of this policy is to ensure compliance with the BSA and the Codes of Practice and to give clear direction to GSFM's ethos with relation to sponsorship and provides guidelines for our sponsors.

POLICY

- All sponsorship enquiries are to go through the Community Marketer;
- All sponsorship announcements will comply with the three key sponsorship conditions outlined above;
- All sponsorship arrangements shall be recorded on a standard contract and approved by the person responsible;
- Sponsorships will not be accepted from companies that promote tobacco, or gambling;
- Sponsorships will not be accepted from person or groups whose policies or practices are inconsistent with the general directions or ethos of GSFM;
- All donations, monetary or otherwise, received while conducting business for or on behalf of GSFM remains the property of GSFM and any gifts such as free tickets, books etc. must be declared to the Program Manager who will determine how they may be distributed in accordance with the ACMA 2008 Sponsorship Guidelines.
- A Member may not seek, request or attempt to procure any gifts for their personal use or benefit ;
- If a Presenter wishes to enter into a Contra Agreement that is, seek products from any business in the broadcasting area, for give-aways in their program in return for providing

airplay or promotion of a business, the Presenter will liaise with the Community Marketer prior to any external discussion;

- All sponsorships require a signed contract by both parties prior to broadcasting the sponsorship;
- GSFM reserves the right to refuse any paid announcement.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ ACMAs 'Sponsorship Guidelines for Community Broadcasting Services' 2008
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ GSFM Sponsorship Guidelines

POLITICAL ENGAGEMENT POLICY			
Policy Number	4.4	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	OOS – 29.08.24
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

On 25 June 2020 the Federal Government's Parliamentary Business Resources Regulations 2017 were amended to allow regional MPs to use their office expenses to pay for the production or placement of content for broadcast on community radio within their electorate.

This change was made in response to the impact of COVID-19 on regional media and to enable members in regional areas to continue to communicate with their constituents.

Regional MPs will be able to broadcast sponsorship to their constituents where there is crossover between that station's licence area and the MP's electorate.
Therefore:

1. Great Southern FM can accept paid political sponsorships at any time, subject to these guidelines; and
2. Regular scheduled interviews by the politician, which are a conduit between a politician and the community.

At all times, GSFM has the right and obligation to exercise editorial control over what it broadcasts and when.

PURPOSE

The purpose of this Political Sponsorship Policy is to ensure that GSFM does not enter lightly into a Paid Sponsorship Agreement (PSA) and that the terms of political engagement are properly considered, agreed and approved.

When a politician purchases sponsorship minutes, this acknowledges that GSFM, in its role as a regional media platform, will help connect its listeners to what happens in Government.

GSFM will offer this opportunity to Federal MP's, State MP's, the Mayor and Local Government Councillors.

POLICY

- PSA content will be included in the five minutes limit in any hour. (Refer to the Broadcasting Services Act 1992 Sch 2, Part 5 clause 9 (3));
- Every PSA announcement will be clearly "tagged". (Refer to the Broadcasting Services Act Sch 2, Part 1, clause 2 (2)b); and
- There must be a bona fide financial relationship (i.e. signed agreement) between the sponsor and GSFM or program.

Political sponsors will be treated no differently than any other sponsor

- Politicians may purchase minutes to promote their activities (Refer to CBAA Political Toolkit for Community Radio Broadcasters Engagement);

- Sponsorship will not be a factor in determining access to broadcasting time;
- The content and style of individual programs is not influenced by the sponsors of programs; and
- Overall programming of community broadcasting stations is not influenced by sponsors.

Further information on sponsorship requirements is available from the ACMA's document, 'Sponsorship Guidelines for Community Broadcasting Services', which can be found at www.acma.gov.au.

Sponsorship Arrangements

GSFM's sales consultant/community marketer will liaise with prospective "clients" in terms of costs, content, and signed agreement.

Disclaimer

- A disclaimer will be played at least once a day, but no more than twice a day;
- The intent of the disclaimer is to make it clear that GSFM is editorially independent and that any political discussion and/or paid political sponsorships, whether at election times or outside election times does not imply that GFSM is affiliated with any political party; and
- Disclaimer will not be played every time a PSA announcement is aired (eg; if a PSA is a weather outro) as the disclaimer could be perceived as adding to the message.

Political Relationships – General [1]

Regular scheduled appearances will cement GSFM as a conduit between a politician and the community.

Community radio provides a valuable vehicle for politicians to use when spreading their message and engaging with the community.

Finding ways to acknowledge the positive work the local representative does can go a long way to building a healthy and respectful relationship.

Interviews with politicians, in particular, the local member (Federal, State or Local Government) can occur with or without a PSA and are not included in the five minutes limit in any hour.

When interviewing a politician always engage in friendly discussions of issues and policies and engage heavily with local issues.

Conversations that politicians are prevented from having on Community Radio:

- Touting/lobbying ("soliciting") for votes to be given to another person;
- Touting/lobbying for any kind of support other than volunteering to be provided to a member, political party or candidate;
- Touting/lobbying for applications to join or renew membership in a political party; and
- Providing instructions on how to complete a ballot paper.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ Broadcasting Services Act 1992
- ⇨ ACMAs 'Sponsorship Guidelines for Community Broadcasting Services'
- ⇨ CBAA Political Toolkit for Community Radio Broadcasters Engagement.

[1] CBAA Political Toolkit for Community Radio Broadcasters Engagement

BROADCAST OF POLITICAL MATTER POLICY			
Policy Number	4.5	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

The Australian Communications and Media Authority (ACMA) have provided guidance on the management of political matters in their Guidelines for the Broadcast of Political Matter.

The rules for election, referendum and political advertising radio are in the Broadcasting Services Act 1992, the Commonwealth Electoral (Authorisation of Voter Communication) Determination 2018, the Commonwealth Electoral Act 1918, and the Referendum (Machinery Provisions) Act 1984

The rules in these Acts cover -

- access for all parties;
- **election and referendum blackout periods when advertisements can't be broadcast;**
- required particulars to be included in advertisements;
- record-keeping requirements; and
- additional advertising provisions during election periods.

PURPOSE

The purpose of this policy is to ensure compliance with the above listed Acts and to give clear direction to GSFM's ethos with relation to the broadcast of all political matters.

POLICY

Political Programming / Commentary

Great Southern FM is an apolitical radio broadcaster. Program content of a political nature **MUST** always be clearly identified as such. Producers and announcers must ensure that content presented has been researched and that due consideration has been given to all points of view. Fair and reasonable opportunity must be given to all parties involved in the respective issue or discussion.

Producers and announcers must have the content approved by the Chair and Program Director.

Access for all parties

You must give **all political parties the opportunity to broadcast** election material if they -

- are contesting the election;
- were represented in the relevant parliament last sitting before the election period.

This rule does not apply to referendums.

Required particulars - All radio election, referendum and political advertisements must include the 'required particulars' information. The required particulars are the authorisation details that must be broadcast following political matter, and applies at all times.

For radio, this is spoken at the end of the advertisement.

The Broadcasting Services Act, Commonwealth Electoral (Authorisation of Voter Communication) Determination 2018 and the Referendum (Machinery Provisions) Act outline what you need to

include, to meet your obligations on required particulars information. The Australian Electoral Commission can also give you advice.

Record-keeping
You must keep records of the person who asked you to show election, referendum and political ads, including their -

- name;
- address;
- occupation; and
- company details (if any).

We must keep a record for 6 weeks of programs we broadcast that relate to a political subject or current affairs in the form of news, an address, a statement, a commentary, or a discussion.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Guidelines for the Broadcast of Political Matter – 2023
- ⇨ CBAA Political Engagement Toolkit for Community Radio Broadcasters

COMMUNITY SERVICE ANNOUNCEMENT POLICY

Policy Number	4.6	Version	2
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

Any broadcast that provides information about community events or promotes community services plays an important role in community radio fulfilling its charter towards supporting the community. These take the form of Community Service Announcements (CSAs) and can promote local sporting event, community theatre, markets, and announcements about goods or services where any money raised benefits the community, a Not-For Profit group, or a community organisation.

PURPOSE

The primary purpose of this policy is to provide an opportunity for community bodies, especially Not-For-Profit or charities, to be able to broadcast information and services to the community at no cost. Great Southern FM (GSFM) is to receive no payment in cash or in kind.

To clarify that CSA's are not "advertising" any costs relating to the said event and are not included in the wording of the CSA, nor are commercial places mentioned if advising tickets can be purchased.

POLICY

The primary purpose of this policy is to provide an opportunity for community bodies, especially Not-For-Profit or charities, to be able to broadcast information and services to the community at no cost. Great Southern FM (GSFM) is to receive no payment in cash or in kind.

To clarify that CSA's are not "advertising" any costs relating to the said event and are not included in the wording of the CSA, nor are commercial places mentioned if advising tickets can be purchased.

These announcements will not be accepted from a person or groups whose policies or practices are inconsistent with the aims or ethics of GSFM.

GSFM reserves the right to refuse any announcement.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ ACMA Sponsorship Guidelines, 2008
- ⇨ GSFM Sponsorship Policy
- ⇨ GSFM Political Engagements Policy

DIVERSITY, INDEPENDENCE AND OUR COMMUNITY INCLUSION POLICY

Policy Number	4.7	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

This policy sets out guidelines for GSFM to have a respectful and supportive radio station that ensures our programming decisions best reflect and serve the community interest that we represent.

PURPOSE

The purpose is to encourage members of the community we serve to participate in our operations and in the selection of and provision of programs under our licence.

POLICY

The programs we broadcast must, collectively, reflect the needs and diversity of our community interest including through the provision of Material of Local Significance. We will endeavour to keep our community interest informed of how community suggestions and participation are reflected in our activities and programming. We will also endeavour to provide access to media for communities not adequately served by mainstream media to participate in providing our service, prioritising the discussion of topics by those with relevant lived experience.

We will endeavour to encourage and assist people in our community interest, to participate in providing our service, prioritising the discussion of topics by those with relevant lived experience.

NB: Community interest – is a common interest shared by a group of people in a community (including audience and participants) that a community broadcasting licensee has identified in its broadcast licence application at the time of allocation or renewal. A community interest may be general in nature (for example, representing the community's needs within the general geographic area of a licence) or it may be specific (eg: an ethnic or cultural background or religious beliefs

Material of Local Significance - as defined in the *Broadcasting Services Act 1992*, is hosted in our licence area, or produced in our licence area, or relates to our licence area.

RELATED DOCUMENTS

- ⇨ ACR Constitution
- ⇨ CBAA Community Radio Broadcasting Codes of Practice
- ⇨ First Nations Engagement and Programming Policy

NEWS AND JOURNALISTIC CONTENT POLICY

Policy Number	4.8	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

In keeping with the Station's aim to be a local voice for the Albany area, 100.9FM is committed to a clear and transparent process for delivering information related to local, national and international issues, events, culture and activities.

PURPOSE

The policy's purpose is to provide a clear statement about reporting of news and that journalistic content is based on principles of independence, transparency, accuracy, and fairness.

POLICY

1. In broadcasting news and journalistic content, we must:

a) provide access to perspectives not adequately represented by other broadcasting sectors

b) ensure that:

i. all factual material is presented accurately

ii. all News Content is presented with due impartiality

News Content means: the news content in a news bulletin, newsbreak, news update or news flash.

c) represent viewpoints fairly without having misleading emphasis, editing out of context or withholding relevant and available material

d) where practical, include the voices of those with relevant lived experience

e) clearly distinguish factual material from analysis, commentary or opinion, comedy, satire, and any other kind of fictional entertainment content

f) exercise special care when reporting on contentious or controversial matters where facts may be contested and not settled and avoid the amplification of misinformation and disinformation

Note: *Misinformation* is verifiably false, misleading, or deceptive information that has the potential to cause serious harm to the community and/or individuals, including *disinformation*, which is misinformation created and/or broadcast with malicious intent.

g) not present material in a way that is likely to create public panic or cause serious distress to reasonable listeners

h) provide correction or clarification of significant errors of material fact in a timely manner

i) ensure our presenters identify themselves and our organisation before proceeding with an interview

j) avoid or adequately disclose any conflict of interest. Any such conflict must not influence the content of a broadcast.

A failure to comply with 1b)i. will not be a breach of the Code if the station makes a correction in an appropriate manner within 30 days of a complaint being received or notice of a complaint being referred to the ACMA (whichever is later).

Note: We must keep a record for 6 weeks of programs we broadcast that relate to a political subject or current affairs in the form of news, an address, a statement, a commentary, or a discussion.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice
- GSFM Defamation Policy

FIRST NATIONS ENGAGEMENT AND PROGRAMMING POLICY

Policy Number	4.9	Version	1
Drafted by	Shelley Pepper	Approved by GSFM Board on	21.06.25
Responsible person	Secretary	Schedule review date	November 2031

INTRODUCTION

This policy sets out guidelines for GSFM members and volunteers to have a respectful and supportive radio station that recognises First Nations peoples as the Traditional Custodians of this land.

PURPOSE

The primary purpose is to provide a shared direction and commitment for the Association so we can work together to respect and value our relationships with First Nations peoples. We will endeavour to work towards reconciliation, by promoting and facilitating respect, trust and positive relationships between First Nations peoples and the wider Australian community.

POLICY

We will endeavour to demonstrate respect and cultural sensitivity for First Nations cultures, languages, histories, knowledge, rights, and experiences in our work and in all programs broadcast. We will endeavour to strengthen relationships with local First Nations people and organisations. We will endeavour to include First Nations people or organisations in the planning and production of content about or affecting First Nations peoples, and seek advice on:

a) using appropriate language, preferred terminology, and correct pronunciation;

b) observing cultural protocols;

c) respecting bereavement practices in content about people who have recently died; and

d) ensuring the consideration of regional differences in protocols, practices, experiences, and perspectives of First Nations communities.

We will endeavour to prioritise First Nations voices when reporting on or discussing First Nations issues.

We will endeavour to seize opportunities to celebrate First Nations peoples and stories recognising the important role community media plays in truth-telling and reconciliation

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice

ARTIFICIAL INTELLIGENCE POLICY

Policy Number	4.10	Version	1
Drafted by	G Sutherland, S Pepper	Approved by GSFM Board on	19.09.26
Responsible person		Schedule review date	Annual - 2027

INTRODUCTION

Great Southern FM (GSFM) is committed to using artificial intelligence (AI) responsibly in ways that support community broadcasting, protect creators' rights and maintain the trust of listeners. AI is increasingly used in broadcasting, production and station operations, and this policy provides a framework for its responsible use while preserving the values of community broadcasting.

POLICY AT A GLANCE

GSFM permits the responsible use of AI to support programming, production, administration and station operations. In practical terms:

- You remain responsible for checking the accuracy, suitability and legality of anything produced with AI.
- AI may assist with research, drafting, proofreading, transcription, translation and routine production tasks.
- AI-generated material must not mislead listeners, fabricate statements or impersonate an identifiable person.
- Confidential station information must not be entered into a publicly available AI service without authorisation.
- Synthesised voices may be used for approved purposes such as weather announcements, time calls and station promotions.
- AI-generated music is not encouraged and must not displace opportunities for human musicians, particularly Australian and independent artists.
- Before broadcasting AI-generated music, its source, copyright, licensing and ethical status must be established. If there is any doubt, consult the Program Manager.
- AI should support human creativity and editorial judgement, not replace them.

This summary is a practical guide only. The remainder of the policy contains the complete requirements that apply to the station's use of AI.

PURPOSE

This policy sets out how GSFM will use AI ethically, responsibly and in accordance with applicable laws and licence obligations

The objectives of this policy are to:

- support responsible innovation
- protect human creativity and editorial independence
- promote Australian and independent artists
- respect copyright and intellectual property rights
- provide clear guidance on acceptable uses of AI

SCOPE

This policy applies to all volunteers, employees, contractors and Board members using AI on behalf of Great Southern FM.

It applies to the use of all AI tools, services, systems and AI agents, whether developed internally or provided by third parties, where they are used in connection with broadcasting, production, administration, automation or other station activities.

The policy applies to both the use of AI for analytical or operational purposes and the use of generative AI to create text, images, audio, music, speech or video.

DEFINITIONS

For the purposes of this policy:

- Artificial Intelligence (AI): Computer systems that perform tasks that would ordinarily require human intelligence. AI includes both generative AI and non-generative AI.
- Non-generative AI: The use of AI to analyse information, recognize patterns, classify data, make predictions or automate tasks without creating new content.

  Examples include identifying whether an artist is Australian, classifying music genres, generating metadata, speech-to-text transcription, analysing playlists or automating routine workflows. Such functions may be provided by AI services including ChatGPT, Google Gemini, Microsoft Copilot and similar technologies when used for analytical or operational purposes.

- Generative AI: The use of AI to create new content, including text, images, music, speech or video.

  Examples include drafting scripts or promotional material, creating synthetic voices, generating music, producing images or writing social media content. Such functions may be provided by AI services including ChatGPT, Google Gemini, Microsoft Copilot, Claude, Suno, ElevenLabs and similar technologies when used to generate new content.

- AI-generated content: Text, images, audio, music or video that has been wholly or substantially created by a generative AI system.
- AI-assisted content: Content created by a person using AI as a tool to assist with research, drafting, editing, transcription, translation or production, where the final work remains under meaningful human editorial control.
- Synthetic voice: Computer-generated speech produced using artificial intelligence, including voice synthesis and voice cloning technologies.
- AI-generated music: Music in which the composition, lyrics, vocals, instrumental performance or other significant creative elements have been generated wholly or substantially by an AI system.

Routine software functions such as spell checking, grammar checking and basic formatting assistance are not intended to be regulated by this policy.

POLICY

AI may be used to support station programming, operations, production and administration, subject to this policy. Presenters, producers and authorised station representatives remain responsible for checking the accuracy, suitability and policy compliance of any AI-assisted or AI-generated material they use or broadcast. Where prior approval is required under this policy, that approval does not remove their responsibility for how the material is selected, contextualised and presented.

POLICY PRINCIPLES

GSFM adopts the following policy principles to guide the use of artificial intelligence and to reflect our obligations to the communities we serve.

- **Human Oversight:** Human editorial judgement always takes precedence.
- **Human Creativity:** AI should support, not replace, human creativity, and should complement the work of musicians, presenters, producers and other creators.
- **Lawful and Ethical Use:** AI must be used lawfully, ethically and transparently.
- **Authenticity:** Listeners should not be deliberately misled about AI-generated content.
- **Transparency:** Where AI-generated content could reasonably affect audience understanding or expectations, GSFM will be open about its use.

- **Cultural Respect:** AI must not be used in ways that undermine or appropriate First Nations cultural expression or other culturally sensitive material.

ETHICAL AI PRO

GSFM will seek to use generative AI services whose providers publicly describe the sources of their training data and represent that they have appropriate rights, licences or other lawful authority to use that material.

When selecting AI services, GSFM will take reasonable steps to satisfy itself that the provider is acting responsibly and ethically in relation to the training of its AI models and the use of copyrighted material.

Where there is credible evidence that an AI service has engaged in significant or deliberate misuse of copyrighted works or voice recordings, the Program Manager or Board may determine that the service should not be used for the creation of broadcast content until those concerns have been satisfactorily addressed.

AI-GENERATED MUSIC

GSFM does not encourage presenters to use AI-generated music in their programs. However, recognising that such music may be encountered or proposed for broadcast, this section establishes the conditions that must be met before it can be used.

AI-generated music may be used by GSFM, but it should not become a significant component of programming or displace opportunities to broadcast human musicians, particularly Australian and independent artists.

AI-generated music may be used for station production, including imaging, promotional material, sponsorship announcements, music beds, podcast intros and production effects.

Before AI-generated music is broadcast, GSFM must be satisfied that the necessary copyright and licensing permissions exist for its broadcast. Where there is uncertainty regarding the legal, ethical or licensing status of AI-generated music, it must not be broadcast until those concerns have been satisfactorily resolved.

Presenters submitting AI-generated music must identify:

- the AI music generation service used;
- the person responsible for creating the work;
- confirmation that the service satisfies the station's Ethical AI Providers requirements; and
- any known copyright, licensing or usage conditions.

SYNTHESISED VOICES

Synthesised voices may be used for weather announcements, time calls, promotional material, sponsorship announcements and other approved station purposes. Synthetic voices must not be used to impersonate an identifiable individual without informed consent. Where a cloned or commissioned voice is used, the station should retain records of consent and any applicable licence conditions.

AI ASSISTED EDITORIAL PRODUCTION

AI may assist with research, drafting, proofreading, transcription, translation and similar production tasks. Presenters and producers remain responsible for factual accuracy, editorial judgement and compliance with station policies and broadcasting requirements.

AI must not be used to fabricate quotations, interviews, testimonials or statements attributed to an identifiable person in a manner that could reasonably mislead listeners.

Any factual information generated or assisted by AI must be verified by a presenter or producer before it is broadcast or published.

AI IN AUTOMATION

GSFM may use AI within approved automation systems where it improves operational efficiency or enhances broadcast services.

Examples include:

- generating weather announcements and other routine spoken information;
- synthesising voice announcements;
- music library management and metadata processing;
- identifying artist information and Australian content; and
- other approved automation processes that support station operations.

AI may be incorporated into internally developed automation processes, provided those processes remain under the oversight of authorised station personnel.

The use of AI in automation does not remove the requirement for appropriate human oversight. Where practical, automated outputs should be reviewed for accuracy before broadcast or publication.

Any automation process that generates broadcast content must comply with the requirements of this policy, including the provisions relating to transparency, ethical AI providers, copyright and editorial responsibility and privacy.

TRANSPARENCY

Great Southern FM values authenticity and trust in community broadcasting.

AI-generated content must not be presented in a manner intended to deceive listeners into believing it was created, performed or spoken by a person where that is not the case.

The station will be transparent about the use of AI-generated content where its use could reasonably influence a listener's understanding of the origin, authenticity or nature of the content.

Where AI-generated or synthetic voices are used to present news or regularly scheduled programs, GSFM will provide appropriate disclosure to listeners in accordance with applicable broadcasting requirements and industry guidance.

Routine production assistance, including research, proofreading, transcription, translation, image editing or administrative workflows, does not normally require disclosure.

The Program Manager may require an on-air or published disclosure where this is considered appropriate.

PRIVACY AND COPYRIGHT

Confidential station information must not be entered into publicly available AI services without authorisation. Users must take reasonable steps to ensure AI-generated content does not infringe copyright or other intellectual property rights.

RESPONSIBILITIES

Any volunteer or staff member who uses an AI tool on behalf of the station is responsible for ensuring that its use complies with this policy. The Program Manager is responsible for deciding whether to approve AI-generated programming content where approval is required under this policy. The Board is responsible for approving significant new uses of AI that may affect station policy, legal compliance or the station's reputation.

The Program Manager or the Board may determine which AI services are approved for particular station activities where this is considered necessary to ensure compliance with this policy.

POLICY REVIEW

This policy will be reviewed annually, or earlier in response to:

- Significant changes in the organisation's use of AI.
- Changes to relevant legislation or regulatory guidance.
- AI incidents that reveal a gap in the policy.
- New AI capabilities (such as agentic AI systems) becoming relevant to our operations.

RELATED DOCUMENTS

- ACR Constitution
- CBAA Community Radio Broadcasting Codes of Practice
- CBAA Factsheet: Artificial Intelligence and Community Radio
- GSFM Volunteer Disciplinary Policy and Procedures