

**Lofty 88.9**  
**Radio with altitude**

## **Compliance**

B32 Appendix 17  
November 2019

# How to navigate Appendix 17

Lofty commenced writing its policies shortly after incorporation in 2017.

In order to assist the reader's navigation of Lofty's policies in the context of Appendix 17, we have designed a compliance alignment grid.

Compliance Item	B32 Appendix	Code Ref	Lofty Policy Family	Policies
Corporate Governance	17.1	1.2	1 (Corporate Governance)	All
Membership	17.2	1.4	3 (Participation)	3.1.1-3.1.2
Internal Conflict	17.3	1.5	3 (Participation)	3.3.1-3.3.3 3.4.0-3.4.4
Complaints Handling	17.4	1.6	6 (Listener Complaints)	All
Community Participation	17.5	2.1	3 (Participation)	3.0.1-3.0.2
Programming	17.6	2.2	4 (Programming)	All
Volunteering	17.7	2.3	3 (Participation)	3.2.1
Sponsorship	17.8	6.1	4 (Programming)	4.1.2

## Other Appendix 17 considerations

### Availability of policy documents

#### *In person*

All policy documents are available at Lofty's premises for perusal.

#### *Online*

As at the time of writing, Policy Family 6 (Listener Complaints) is available for viewing and/or download at [lofty.org.au/compliance](https://lofty.org.au/compliance) as a series of PDF documents.

Work is underway to provide an enhanced Policy repository on Lofty's website, including search and hyperlink functions. We expect this to go live during 2020.

#### *Other methods*

Lofty welcomes requests for copies of respective policy documents via email.

## **Appendix 17.1**

### **Corporate Governance**

Lofty Policy Family 1



## POLICY DOCUMENT 1.0.1

**Policy Name (full)** Governance > Constitution  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** This policy defines the handling and maintenance of Lofty's Constitution.

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### Introduction

Lofty Community Media Incorporated is an incorporated association, subject to the Associations Incorporation Act (SA) 1985. As an incorporated association, Lofty is obliged to operate under a set of rules that has been agreed to by its members, usually in the form of a Constitution.

### Purpose

Whilst the Constitution itself defines the handing and maintenance of this core document, this Policy acts as an overlay to set best practice in terms of ensuring that the Constitution remains available for any person, irrespective of whether or not they are a current Lofty member, to freely access this document.

### Policy

Rule 14 of the Lofty Constitution states:

- a. The Constitution and current policy documents shall be made freely available to any potential member upon their initial expression of interest in joining the Association, or as soon as practicable thereafter.
- b. The Constitution and current policy documents must be kept at the principal place of administration of the Association and must be open for inspection, free of charge, by any member of the Association at any reasonable hour.

In order to satisfy this rule, Lofty's Constitution can be read in the following ways:

1. Direct download from Lofty's website (<http://lofty.org.au/index.php/about/constitution>).
2. PDF delivered via email, upon request.
3. A certified hard copy of the Constitution can be viewed at Lofty's studio, 20 Stephen Street, Mount Barker SA 5251, by appointment.

In the first instance, we recommend accessing the Constitution via the Lofty website. This PDF is freely available 24 hours a day, 7 days a week, from anywhere in the world.



## POLICY DOCUMENT 1.0.2

**Policy Name (full)** Governance > Board & Subcommittee Meetings  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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### PRECIS

This policy defines policies around board and Subcommittee meetings, expanding upon Rules 32, 33, 34 and 35 of the Lofty Constitution.

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### Introduction

Whilst the Lofty Constitution is a comprehensive and robust document, it sets only the minimum standards required for compliance, particularly in terms of frequency and timing of meetings.

This policy overlays the Constitution, most notably rules 32 through 35, which cover the composition of the Board, quora for Board and/or Subcommittee meetings, expectations in terms of minute taking and so on.

### Purpose

This policy sets out timetables for Board and Subcommittee meetings.

### Policy

1. Board Meetings are scheduled to be held monthly, on the third Wednesday of each month.
2. Subcommittee meeting schedules are to be drawn up by each respective Subcommittee.
3. Whilst Rule 33 does not explicitly state a frequency for Subcommittee meetings, the expectation is that Subcommittee meetings would be scheduled on a regular basis (e.g. monthly, bi-monthly or quarterly depending on the nature and workload on said Subcommittee).
4. In order to maximise effectiveness of communication between the Board and Subcommittees, the expectation is that Subcommittee meetings would occur approximately two weeks before or after a Board meeting.
5. For the purpose of Rule 35 of the Constitution, the rules pertaining to minute taking for the Board shall also apply to each Subcommittee.
6. Board or Subcommittee meeting minutes are to be taken and stored in terms of Rule 35. Storage is in the form of hard copies retained at Lofty's studio, along with soft copies held on shared folders in Lofty's Google Drive, with said folders being restricted to each Board/Subcommittee member.
7. Whilst said Board meeting minutes are not to be openly published, they are to be made available to any member upon request. Depending on the nature of the minutes, they may either be provided freely or – in the case of minutes dealing with highly sensitive or commercial-in-confidence items, access may be provided on a restricted basis.

8. Where a request to view a Board or Subcommittee meeting's minutes contains information that is of a highly sensitive or commercial-in-confidence nature, the Board reserves to the right to place reasonable limits on accessing said minutes. This may include, but is not limited to:
  - a. placing minutes under embargo until a specified time-based event occurs or milestone is met; or
  - b. providing a copy of the minutes with sensitive or confidential information redacted; or
  - c. allowing supervised read-only access to minutes by appointment, with notetaking apparatus of any kind (including but not limited to pens, pencils, paper and smartphones) being prohibited from use whilst said member is reading the highly sensitive or commercial-in-confidence minutes; or
  - d. a combination of the above.



## POLICY DOCUMENT 1.0.3

**Policy Name (full)** Governance > Financial Management  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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### PRECIS

This policy defines policies around Lofty's Financial Management function. Said policies are to complement and supplement Part G of the Lofty Constitution.

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### Introduction

Lofty's Constitution sets a robust financial management framework for the Board in general, and the Treasurer in particular, to work within. A substantial portion of the Constitution's Part G (Financial and Risk Management) is dedicated to setting hard limits and controls to act as a safety net in the unlikely event that one or more Lofty Board members attempt to abuse their office for personal gain.

Our Financial Management policies work in conjunction with the Constitution. Indeed, many of these policies are primarily a translation of rules into simpler language.

Whilst every effort has been taken to ensure consistency between these policies and the Constitution, the latter outranks the former by virtue of being a statutory document.

### Financial Management Functions

Due to the quantity and/or complexity of Lofty's Financial Management functions, are contained within their own discrete policies. In some instances, these functions may be broken down into sub-functions.

Function	Policy
Funding sources and application	1.3.1 Governance > Financial Management > Funding sources and application
Insurances	1.3.2 Governance > Financial Management > Insurances
Banking	1.3.3 Governance > Financial Management > Banking
Payments and Purchases	1.3.4 Governance > Financial Management > Payments and Purchases
External Audit	1.3.5 Governance > Financial Management > External Audit
Asset Register	1.3.6 Governance > Financial Management > Asset Register

### Treasurer

The Treasurer oversees and ensures compliance with Lofty's Financial Management functions on behalf of the Board. This is an elected position, with the Treasurer serving a two (2) year term from the date of the Annual General Meeting (AGM) at which they were elected. Pursuant to Rule 25.g of the Constitution, the Treasurer is elected at an AGM that is held in an odd numbered year.

### External Auditor

An External Auditor may be appointed pursuant to Rule 61 of the Constitution.





## POLICY DOCUMENT 1.0.4

**Policy Name (full)** Governance > Subcommittee Parameters  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

### PRECIS

This policy defines common parameters for all Subcommittees.

### Introduction

There are four categories of Subcommittee member: Full Member, Junior Member, Board Rep and Observer.

<b>Category</b>	<b>Full Member</b>
<i>Definition and purpose</i>	<p>A Subcommittee member with all rights and powers conferred upon them pursuant to Rules 33 and 34 of the Lofty Constitution.</p> <p>Every Lofty member has the right to participate in one or more Subcommittees (subject to <i>concurrent service</i> conditions).</p>
<i>Prerequisites</i>	<p>Current Lofty membership.</p> <p>A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills (mandatory).</p>
<i>Appointment</i>	<p>All members are to be informed of Subcommittee vacancies as and when they occur.</p> <p>Expressions of Interest (Eol) for Subcommittee Full Member vacancies are to be sent to the Board or its nominated delegate in writing, viz. e-mail, written note, SMS, instant messaging etc.</p> <p>Full Members shall be appointed by the Board pursuant to the Eol process.</p> <p>Where the number of received Eol is fewer than or equal to the number of positions, all applicants shall be offered a Full Member position on said Subcommittee.</p> <p>Where the number of received Eol is greater than the number of positions, the Board is to offer Full Member position(s) based on merit.</p>
<i>Term</i>	<p>Standard term is twelve (12) months, unless otherwise defined within Policy pertaining to a specific Subcommittee.</p>
<i>Concurrent service</i>	<p>A Full Member may concurrently serve on a maximum of two (2) Subcommittees in terms of Rule 33(d) of the Lofty Constitution.</p>
<i>Special conditions</i>	<p>Not applicable.</p>



<b>Category</b>	<b>Junior Member</b>
<i>Definition and purpose</i>	<p>A Lofty member aged 17 years or younger who wishes to join a Subcommittee.</p> <p>For legal reasons, a Lofty member needs to be at least 18 years of age to qualify to serve on the Board. However, a Junior Member may serve on the Board subject to the conditions of the Subcommittee Junior Member parameters.</p>
<i>Prerequisites</i>	<p>Current Lofty membership.</p> <p>A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills (mandatory).</p>
<i>Appointment</i>	<p>A Lofty member aged 17 years or younger may submit an Expression of Interest (Eoi) to become a Junior Member of a Subcommittee at any time. Said Eoi shall be in writing viz. e-mail, written note, SMS, instant messaging etc.</p> <p>Prior to appointing a Junior Member, Lofty shall confirm permission with the nominee's parent or guardian.</p>
<i>Term</i>	<p>Standard term is twelve (12) months, unless otherwise defined within Policy pertaining to a specific Subcommittee.</p> <p>Where the Junior Member has their 18<sup>th</sup> birthday during their current term, said Junior Member shall be promoted to Full Member status for the remainder of their current term.</p>
<i>Concurrent Service</i>	<p>The Junior Member may concurrently serve on a maximum of one (1) Subcommittee.</p>
<i>Special conditions</i>	<ol style="list-style-type: none"> <li>1. Due to their legal status as a minor, the Junior Member is disqualified from Board delegation rights pursuant to Rule 33 of the Lofty Constitution.</li> <li>2. Pursuant to Rule 34 of the Lofty Constitution, the Junior Member has the right to cast a <i>provisional</i> vote.</li> <li>3. Where an equality of votes occurs in terms of Rule 34(2), the Presiding Officer shall consider the Junior Member's provisional vote as their casting vote.</li> </ol>

<b>Category</b>	<b>Board Representative (Board Rep)</b>
<i>Definition and purpose</i>	<ul style="list-style-type: none"> <li>• The Board Rep is a delegate of the Board to the Subcommittee,</li> <li>• The Board Rep acts as a liaison point between the Subcommittee and the Board.</li> <li>• From the Board's perspective, this means seeking feedback and/or agreement on strategic direction under which said Subcommittee shall operate.</li> <li>• From the Subcommittee's perspective, this means providing feedback on how strategy is being executed, as well as providing recommendations for the Board to consider where appropriate.</li> </ul>
<i>Prerequisites</i>	<p>A Board Rep shall be a currently serving member of Lofty's Board.</p> <p>A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills (mandatory).</p>
<i>Appointment</i>	Appointment occurs as soon as practicable after said Board member is elected.
<i>Term</i>	Standard term is twelve (12) months <i>per Subcommittee</i> unless otherwise defined within Policy pertaining to a specific Subcommittee. Under normal circumstances, this should lead to one (1) standard term on two (2) Subcommittees during a standard Board term viz. two (2) years.
<i>Concurrent Service</i>	A Board Rep member may concurrently serve on a maximum of one (1) Subcommittee.
<i>Special conditions</i>	<ol style="list-style-type: none"> <li>1. The Board Rep has no voting rights on their given Subcommittee.</li> <li>2. Where a concern has been raised in relation to a Full Member's participation in a Subcommittee, or if the Board Rep has any concerns as a result of direct observations of said Full Member, the Board Rep may attempt to resolve this concern by applying Lofty's Conflict Resolution framework.</li> <li>3. For the purposes of Rule 33(c) of the Lofty Constitution, appointment to a Subcommittee as a Board Rep is deemed to be an act of authorisation by the Board.</li> </ol>

<b>Category</b>	<b>Observer</b>
<i>Definition and purpose</i>	<p>An Observer is a party that is neither a Board member nor a Subcommittee member, but has been invited to attend a Subcommittee meeting by either the Board or Subcommittee.</p> <p>In the context of Lofty's Subcommittee governance policies, an Observer means a third party invited to a Subcommittee meeting to:</p> <ul style="list-style-type: none"> <li>• view the proceedings of said meeting in a passive manner;</li> <li>• to relay observations of Lofty given to them by the local community, or;</li> <li>• for any other purpose that the Board and/or the Subcommittee sees fit.</li> </ul>
<i>Prerequisites</i>	A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills (mandatory).
<i>Appointment</i>	By invitation unless otherwise specified.
<i>Term</i>	Casual unless otherwise specified.
<i>Concurrent Service</i>	N/A
<i>Special conditions</i>	<ol style="list-style-type: none"> <li>1. An Observer has no voting rights.</li> <li>2. Policies within the Governance &gt; Subcommittee Policy Subfamily 1.2 may contain additional parameters, sanctions and/or protocols relating to an Observer's role in the context of a Subcommittee, including but not limited to prerequisites, appointments and terms.</li> <li>3. The Subcommittee shall have the power to exclude an Observer from meeting proceedings where items of a sensitive, commercial-in-confidence or otherwise confidential nature (as determined by the Board and/or Subcommittee) are to be considered.</li> </ol>



## POLICY DOCUMENT 1.1.1

**Policy Name (full)** Governance > Board Roles > Chair  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** Definition of the Chair's role on the Board.

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### Introduction

The Chair is the leader of the Board, and has a very important job. Their role is to lead the Board and assist the Board in arriving at sound decisions to help further Lofty's objectives.

This role is best suited to someone that has either been a Board member for several years, or has other experience outside of Lofty. Relevant experience may include small business ownership, middle or senior management in a large corporation, or another similar role where leadership and business acumen is required.

Whilst broadcasting experience is highly desirable, this is not compulsory. A solid head for business is a strong basis for an effective Chair.

The Chair's role is re-elected bi-annually in even numbered years. As at the time of writing this document, the Chair is due to be re-elected at the 2020 Lofty AGM.

### Policy

This is a list of key expectations the Lofty has of its Chair.

<b>Governance</b>	Provide leadership to the organisation
	Ensure, in partnership with the Board, that the organisation's objectives, goals and mission are being followed
	Ensure, in partnership with the Board, that the organisation develops in the appropriate direction
	Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion
<b>Planning</b>	Playing a key role, along with the Vice Chair, Treasurer and Secretary, in the development and review of Lofty's Business Plan, Marketing Plan and any other such plans as required.
<b>Meetings</b>	Ensure that appropriate standing orders are in place
	With the Secretary, prepare the agenda in advance of the meeting
	Chair Board meetings according to Standing Orders
	Rule on issues of meetings procedure not covered in the Standing Orders
	Report to the Annual General Meeting on the situation of the organisation
	Chair General Meetings according to Standing Orders
<b>Management</b>	Assign [in partnership with the Board] administrative duties to Board members and volunteers
	Manage the business of the Board
	Manage the recruitment, induction, and training of Board members [in partnership with the Board]

	Manage [in partnership with the Board] the assessment, review and renewal of the Board
	Manage the organisation's grievance procedures
	Ensure the harmony of Board deliberations
	Manage [in partnership with the Board] the succession of the position of Chair
<b>Administrative</b>	Personally carry out administrative duties as assigned
<b>Media</b>	Under the organisation's Media Policy, serve as spokesperson for the organisation as appropriate
<b>Promotion</b>	Promote the organisation in the community as opportunities arise
<b>Negotiation</b>	Serve [as nominated by the Board] in negotiation with other organisations
<b>Legal</b>	Ensure that <ul style="list-style-type: none"> <li>the modes of performance of all legal requirements are featured in the procedures manual</li> <li>the performance of all legal requirements is reported to the Board</li> <li>the performance of all legal requirements is fully documented.</li> </ul>
	Ensure that all legal requirements are met
<b>Finance</b>	With the Treasurer, ensure the organisation's financial control procedures are adequate and that risk management strategies are in place
<b>Other duties</b>	As for Board members, defined in Policy 1.1.5 Governance – Board Roles – Board Member



## POLICY DOCUMENT 1.1.2

**Policy Name (full)** Governance > Board Roles > Vice Chair  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** Definition of the Chair's role on the Board.

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### Introduction

The Vice Chair acts as a second-in-command of the Board. The Chair may delegate tasks or projects for the Vice Chair to complete, and the Vice Chair may also act as Chair during Board Meetings where the Chair is absent.

This role is best suited to someone that has either been a Board member for several years, or has other experience outside of Lofty. Relevant experience may include small business ownership, middle or senior management in a large corporation, or another similar role where leadership and business acumen is required.

Whilst broadcasting experience is highly desirable, this is not compulsory. A solid head for business is a strong basis for an effective Vice Chair.

The Vice Chair's role is re-elected bi-annually in odd numbered years. As at the time of writing this document, the Vice Chair is due to be re-elected at the 2019 Lofty AGM.

### Policy

This is a list of key expectations the Lofty has of its Vice Chair.

<b>Governance</b>	Provide leadership to the organisation
	Ensure, in partnership with the Board, that the organisation's objectives, goals and mission are being followed
	Ensure, in partnership with the Board, that the organisation develops in the appropriate direction
	Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion
<b>Planning</b>	Playing a key role, along with the Chair, Treasurer and Secretary, in the development and review of Lofty's Business Plan, Marketing Plan and any other such plans as required.
<b>Meetings</b>	Act as the Chair's delegate when the Chair is unable to attend a Board meeting.
	When acting as Chair, the Vice Chair's expectations shall be as those of the Chair, as defined in Policy 1.1.1 Governance – Board Roles – Chair
<b>Management</b>	Assign [in partnership with the Board] administrative duties to Board members and volunteers
	Assist the Chair in managing the business of the Board
	Assist the Chair in managing the recruitment, induction, and training of Board members [in partnership with the Board]
	Manage [in partnership with the Board] the assessment, review and renewal of the Board

	Assist the Chair in managing the organisation's grievance procedures
	Ensure the harmony of Board deliberations
	Manage [in partnership with the Board] the succession of the position of Chair
<b>Administrative</b>	Personally carry out administrative duties as assigned
<b>Media</b>	Under the organisation's Media Policy, serve as spokesperson for the organisation as appropriate, when delegated.
<b>Promotion</b>	Promote the organisation in the community as opportunities arise
<b>Negotiation</b>	Serve [as nominated by the Board] in negotiation with other organisations
<b>Legal</b>	<p>Ensure that</p> <ul style="list-style-type: none"> <li>the modes of performance of all legal requirements are featured in the procedures manual</li> <li>the performance of all legal requirements is reported to the Board</li> <li>the performance of all legal requirements is fully documented.</li> </ul> <p>Ensure that all legal requirements are met</p>
<b>Finance</b>	Assist the Chair and Treasurer in managing the organisation's financial control procedures are adequate and that risk management strategies are in place
<b>Other duties</b>	As for Board members, defined in Policy 1.1.5 Governance – Board Roles – Board Member





## POLICY DOCUMENT 1.1.3

**Policy Name (full)** Governance > Board Roles > Secretary  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** Definition of the Secretary's role on the Board.

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### Introduction

The Secretary of a not-for-profit organisation has a very important role. Compliance, administration and negotiation are just three roles the Secretary plays on the Board.

This role is best suited to someone that has either been a Board member for several years, or has other experience outside of Lofty, such as academia or legal services.

The Secretary's role is re-elected bi-annually in even numbered years. As at the time of writing this document, the Secretary is due to be re-elected at the 2020 Lofty AGM.

### Policy

This is a list of key expectations the Lofty has of its Secretary.

<b>Planning</b>	Playing a key role, along with the Chair, Vice Chair and Treasurer, in the development and review of Lofty's Business Plan, Marketing Plan and any other such plans as required.
	Ensure that appropriate standing orders are in place
<b>Meetings</b>	Organise the venue for Board meetings
	With the Chair, prepare the agenda in advance of each Board meeting
	Organise meeting papers for distribution before the meeting
	Take minutes at each Board meeting and circulate to Board members
	Take minutes at each General Meeting and circulate to members of the organisation
<b>Management</b>	Serve on Board committees as required
<b>Administrative</b>	Maintain a register of members
	Handle the procedures for the admission of new members
	Handle the procedures for the resignation of members
	Handle the procedures for the discipline, suspension and expulsion of members
	Organise General Meetings and notify members in advance
	Receive nominations for positions on the Board
	Keep in their custody all books, documents and securities, and make them available to members as requested
	Liaise with relevant regulators, including but not limited to Consumer & Business Affairs SA (CBS) and the Australian Communications & Media Authority (ACMA).

	Personally carry out administrative duties as assigned by the Chair
<b>Media</b>	<i>Ensure preparation and adoption of a Media policy</i>
<b>Promotion</b>	Promote the organisation in the community as opportunities arise
<b>Negotiation</b>	As nominated by the Board, serve in negotiation with other organisations
<b>Legal</b>	Keep the Common Seal of the organisation
<b>Other duties</b>	As for Board members, defined in Policy 1.1.5 Governance – Board Roles – Board Member



## POLICY DOCUMENT 1.1.4

**Policy Name (full)** Governance > Board Roles > Treasurer  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** Definition of the Treasurer's role on the Board.

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### Introduction

The Treasurer of a not-for-profit organisation has a very important role. An effective Treasurer is more than just a bookkeeper; they are also able to provide valuable input into ensuring the organisation's long-term financial sustainability.

This role is best suited to someone that has either been a Board member for several years, or has other experience outside of Lofty, such as financial services or accounting.

The Treasurer's role is re-elected bi-annually in even numbered years. As at the time of writing this document, the Treasurer is due to be re-elected at the 2019 Lofty AGM.

### Policy

This is a list of key expectations the Lofty has of its Treasurer.

<b>Governance</b>	Ensure that the Board maintains the degree of financial literacy necessary to conduct the business of the organisation
	Advise the Board on matters of finance
	Advise the Board on fundraising
	Ensure that appropriate financial policies and procedures are in place and fully documented
<b>Planning</b>	Playing a key role, along with the Chair, Vice Chair and Secretary, in the development and review of Lofty's Business Plan, Marketing Plan and any other such plans as required.
<b>Meetings</b>	Report to the Board at each meeting on the financial situation of the organisation
	Report to the Board at each meeting on variances from the approved budget
	With the Secretary, place any necessary financial items on the Board agenda in advance of the meeting
	Report to the Annual General Meeting on the financial situation of the organisation
<b>Administrative</b>	Serve on the Executive Committee between Board meetings
	Personally carry out financial duties as assigned
	Keep the books of the organisation
	Ensure the organisation's financial records are adequate, protected, backed up, and accessible.
<b>Management</b>	Manage the organisation's banking
	Maintain the organisation's asset register

<b>Finance</b>	Ensure the organisation's financial control procedures are adequate and that appropriate safeguards against fraud are in place
	Ensure that risk management strategies (including appropriate insurances) are in place
	Collect and receive all money due to the organisation and make all payments authorised by the organisation
	Oversee the organisation's investment strategy and report to the Board
	Prepare the Budget for the coming year
	Review income and expenditure against the budget on a continuous basis
<b>Legal</b>	Ensure the organisation's compliance with all applicable tax arrangements
<b>Other duties</b>	As for Board members, defined in Policy 1.1.5 Governance – Board Roles – Board Member



## POLICY DOCUMENT 1.1.5

**Policy Name (full)** Governance > Board Roles > Board Member  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** This policy is effectively a job & person specification for an ordinary Board Member.

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### Introduction

Every Lofty member aged 18 years or older is able to nominate for election to the Lofty Board. At every AGM, half of Lofty's Board must resign (but may nominate to be re-elected) and all Lofty members present at the AGM shall vote for new or re-nominated Board members to join the Lofty Board.

Should you, as a Lofty member, wish to nominate for the Board, this is what we expect from you. Even if you don't have skills or experiences in all of the below fields, don't let this stop you from nominating for the Board. Existing Board members will be more than happy to provide you with the skills and training to grow into a Board member role, and you may have the opportunity to help fill other Board members' skill gaps.

### Policy

This is a list of key expectations the Lofty has of its Board Members.

<b>General</b>	On being elected to the Board, undertake induction and training procedures as provided by the Board
<b>Governance</b>	Consider, debate, and vote on issues before the Board on the basis of the best interests of the organisation only
	Comply with the rules, policies, and standing orders of the organisation
<b>Planning</b>	Review and approve the organisation's Strategic Plan, and other consequential arrangements (Business Plan, Marketing Plan, etc)
<b>Meetings</b>	Attend all meetings, or, if absolutely unavoidable, apologise in advance for absence
	Where Board papers are circulated in advance of the meeting, read papers and consider issues before the meeting
	Contribute to the discussion and resolution of issues at meetings and otherwise as appropriate
<b>Management</b>	Serve on Board committees as required
	Review and approve the organisation's systems for financial control and risk management
	Understand the organisation's finances (including solvency)
<b>Administration</b>	Undertake administrative duties as required
<b>Media</b>	Make comments to the media only as provided in the organisation's Media Policy
<b>Promotion</b>	Promote the organisation in the community as opportunities arise
<b>Fundraising</b>	Participate enthusiastically in any fundraising approved by the Board

<b>Legal &amp; Ethical</b>	Avoid making any improper use of their position in the organisation so as to gain any material advantage for themselves, or for any other person, or to the detriment of the organisation
	Avoid making any improper use of any information acquired by virtue of their position in the organisation so as to gain any material advantage for themselves, or for any other person, or to the detriment of the organisation
	If they have any direct or indirect material personal interest in any contract with the organisation, inform the Board immediately
	If they have any direct or indirect material personal interest in any contract with the organisation, not vote in the Board on that issue
	If they have any non-material personal conflict of interest in any matter before the Board, or believe that the perception of such a conflict might arise, inform the Board immediately and follow the Board's rulings as to proper procedure
	At all times conduct Board business politely and with consideration for others, without ill feeling, improper bias, or personal animus



## POLICY DOCUMENT 1.2.1

<b>Policy Name (full)</b>	Governance > Subcommittees > Marketing and Community Engagement (MACE)
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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<b>PRECIS</b>	Defines the role of the Marketing and Community Engagement (MACE) Subcommittee, along with its relationships both inside and outside of Lofty.
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### Introduction

One of our Lofty Goals is to create opportunities for all members to contribute to Lofty's operations and strategy. Lofty's operations have been grouped into a number of categories, in order to provide members with options that are focused on a relatively narrow part of Lofty.

Whilst each function of Lofty is interdependent with almost every other function, grouping said functions in this manner allows each Subcommittee to focus on their specialist area, and frees up the Board to continue guiding Lofty in a more holistic manner, without being bogged down on one small part of the enterprise.

This document defines the Marketing and Community Engagement (MACE) Subcommittee ["MACE"].

This policy is to be read in conjunction with Policy 1.0.4 Governance > Subcommittee Parameters.

### Structure

<b>Full Member</b>	Minimum two (2), maximum four (4)
<b>Junior Member</b>	No minimum, maximum two (2)
<b>Board Rep</b>	One (1)
<b>Observer</b>	One (1) Community Representative ["Community Rep"]

A description of the Community Rep position is provided in Appendix A.

### Prerequisites

Policy 1.0.4 sets minimum Subcommittee prerequisites for Full Members, Junior Members and Board Reps. Appendix A sets minimum prerequisites for the Community Rep.



Whilst there are no other specific pre-requisites to serve on MACE, experience, qualifications and/or a genuine interest in one or more of the following areas is highly desirable:

- marketing, public relations, tourism and/or promotions;
- business-related disciplines, either practical (e.g. small business owner, SME management position, marketing or PR within a corporate or not-for-profit etc) or theoretical (viz. post-secondary qualification in business, marketing or similar); and
- an established personal network of business owners, community groups, sporting groups, service organisations, tourism operators, Government contacts and/or local persons of influence.

## Scope

Key areas that MACE is focused on in both a strategic and operational capacity:

**Governance**      Ensure that Lofty's marketing and/or sponsorship activities remain compliant with the Community Radio Broadcasting Codes of Practice 2008 ["the Code"], the Community Broadcasting Participation Guidelines ["the Guidelines"], the Broadcasting Services Act 1992 (Cth), Lofty's Constitution ["the Constitution"] and/or any other relevant policy and/or legislative instrument(s) as required.

Ensure, in partnership with the Board, that Lofty operates in an ethically, environmentally and socially responsible fashion.

**Planning**      Playing a key role, along with the Board, in the development and review of Lofty's marketing and community engagement strategies, and any other such plans as required.

**Meetings**      Hold regular Subcommittee meetings.

Provide the Board with timely minutes after each regular Subcommittee meeting.

Attend Board meetings on behalf of the Subcommittee when requested and/or nominated to do so

Make presentations at General Meetings (as required) in relation to marketing and/or community engagement matters.

**Management & Operations**      Manage Lofty's current marketing and community engagement related policies, procedures and protocols.

Design, develop and maintain new Programming policies, procedures, protocols and best practices.

Act as the Board's delegate in relation to marketing and community engagement decisions.

Seek opportunities to create new relationships with community groups, community leaders, sporting groups, tourism groups, relevant contacts at all tiers of government and any other relationships that may assist Lofty in advancing its objects as per rule 3 of the Constitution.

Liaise with the Production & Training (P&T) and Programming Subcommittees in relation to the production and scheduling of community announcements, sponsorship announcements and other relevant marketing and/or community engagement broadcasts as required.

Liaise with the Technology & Facilities (T&F) Subcommittee in relation to the use of Lofty's technology to increase the reach of marketing and community engagement activities viz. web site, social media etc., along with sourcing and maintaining access to all Lofty technology systems required by MACE members to carry out their duties in an efficient and effective manner.

**Administrative** Ensure that all marketing and community engagement related documentation is prepared and maintained in a professional manner.

Carry out administrative duties as assigned.

**Media** Members of this Subcommittee are prohibited from speaking to the media on Lofty's behalf, unless the Board has delegated one or more named Subcommittee members to speak on a specialised topic, where the Board believes said skills and expertise of the delegated media representative would present Lofty in a professional and credible manner.

*In practice, the expectation is that at least one member of MACE shall be nominated as Lofty's media contact.*

**Promotion** Promote Lofty in the community as opportunities arise.

Formulate marketing, community engagement and promotional strategies to increase community awareness of Lofty's objectives.

Writing announcement copy, including but not limited to sponsorship, community and/or Lofty-related announcements.

Preparation and submission of press releases and/or similar material on Lofty's behalf.

Maintaining, protecting and advancing Lofty's brand in the context of Policy Family 7.1 (Marketing > Branding).

Undertake other promotional and promotion-related activities as discussed with the Board from time to time.

**Negotiation**

Negotiation with the Lofty Board and/or with external stakeholders as delegated by the Lofty Board from time to time.

Negotiation with potential sponsors.

**Legal**

Ensure that:

- all sponsorship spots comply with the Code, the Act and with Lofty's sponsorship principles;
- any breaches or potential breaches of the Code and/or Act are captured and dealt with via the appropriate channels;
- support the Programming Subcommittee in considering listener arising as a result of sponsorship announcements and/or other on-air announcements, Policy Family 6 (Listener Complaints);
- assist with Programming-related legal reporting requirements as required from time to time viz. investigations into listener complaints;
- the performance of all legal requirements within MACE scope is reported to the Board;
- the performance of all legal requirements within MACE scope is fully documented; and
- reported faults, errors or omissions pertaining to marketing and/or community engagement material are followed up by the relevant Subcommittee(s) in a timely manner.

**Finance**

Prepare and issue sponsorship proposal quotes, including pricing.

Development of pricing policies and strategies relating to sponsorship sales.

Liaise with Lofty's Treasurer and/or Secretary in relation to invoicing sponsors.

Arrange and manage advertising within the marketing budget(s) set by mutual agreement between MACE and the Board from time to time.

Identify suitable grant opportunities to further Lofty's marketing and/or community engagement activities as and when said opportunities arise.

**Internal relationships**

- Board
- Production & Training (P&T) Subcommittee
- Programming Subcommittee
- Technology & Facilities (T&F)
- Membership & Admin (A&M) Subcommittee
- Presenters
- All other members and volunteers

**External relationships**

- Local Government staff and elected representatives
- Community leaders
- Local business owners and groups
- Local tourism groups and/or individual operators
- Community organisations
- Mount Barker RA1 residents

## Appendix A

<b>Subcommittee Member Category</b>	<b>Observer (Community Rep)</b>
<i>Definition and purpose</i>	<p>The Community Rep is an independent third-party that acts as a conduit between Lofty's Marketing and Community Engagement Subcommittee (MACE) and the Mount Barker RA1 community.</p> <p>This position plays an important role in ensuring Lofty continues to meet the community interest, as well as providing advice and support to encourage community participation in Lofty's operations.</p> <p>In addition to serving on MACE, the Community Rep shall also facilitate focus groups consisting of community members as directed by MACE and/or the Board.</p>
<i>Prerequisites</i>	<p><u>Minimum</u>: An independent third party who is a resident of Mount Barker RA1.</p> <p><u>Desirable</u>: An independent third party who is employed within Mount Barker RA1 in a Community Development<sup>1</sup> role by a Local, State or Federal Government agency or equivalent.</p> <p><u>Mandatory</u>: A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills.</p>
<i>Appointment</i>	<p>At the Board's discretion, a suitable Community Rep may either be identified and approached by Lofty or recruited via a public expression of interest (Eoi) call.</p> <p><i>Unsuccessful public Eoi applicants may opt-in for invites to participate in future community focus groups as run by Lofty from time to time.</i></p>
<i>Term</i>	<p>Where a Community Rep is either a resident of Mount Barker RA1 or is employed within Mount Barker RA1 in Community Development role on a permanent full-time or permanent part-time basis: <u>Maximum 12 months.</u></p> <p>Where a Community Rep is employed within Mount Barker RA1 in Community Development role on a fixed-term contract basis: <u>Maximum of either 12 months or the expiration date of their current employment contract, whichever occurs first.</u></p> <p>Where a Community Rep is employed within Mount Barker RA1 in Community Development role on a casual basis: <u>Maximum of either 12 months or upon ceasing employment in their current Community Development role, whichever occurs first.</u></p>
<i>Concurrent Service</i>	N/A
<i>Special conditions</i>	<ul style="list-style-type: none"> <li>• A Community Rep has no voting rights.</li> <li>• A Community Rep shall not be remunerated for their service on MACE, in accordance with Rule 63 of the Lofty Constitution.</li> </ul>

<sup>1</sup> <https://aifs.gov.au/cfca/publications/what-community-development>

	<ul style="list-style-type: none"> <li>• A Community Rep may be excluded from meeting proceedings where an item of a sensitive, commercial-in-confidence or otherwise confidential nature (as determined by the Board and/or Subcommittee) is to be considered.</li> <li>• For policy purposes, a Community Rep shall be subject to the same conditions as any other volunteer; specifically, Policy Family 5 (Volunteers).</li> </ul>
<i>Special conditions – end of term</i>	<ul style="list-style-type: none"> <li>• An incumbent Community Rep may resign from the position prior to serving their full term by giving Lofty a minimum of two (2) weeks written notice.</li> <li>• Lofty may replace the incumbent Community Rep prior to the expiry of their full term if (a) Lofty gives the incumbent Community Rep a minimum of two (2) weeks written notice and (b) Lofty has already selected a replacement Community Rep.</li> </ul>
<i>Special conditions – exclusion period</i>	<ul style="list-style-type: none"> <li>• To maintain diversity in the expression of community interest, the Community Rep shall be subject to an exclusion period upon the expiration of their term.</li> <li>• The outgoing Community Rep may not be reappointed for a minimum of three (3) years from the expiry date of said term.</li> <li>• When giving consideration to reappointing a former Community Rep after their exclusion period has elapsed, Lofty is to confirm that said Community Rep still fulfils the prerequisites for the Community Rep role prior to reappointment.</li> </ul>
<i>Special conditions – Lofty membership</i>	<ul style="list-style-type: none"> <li>• Current Lofty members are ineligible to serve in a Community Rep role, as their member status permits them to seek an appointment to a Lofty Subcommittee commensurate with their member category (viz. Full Member, Junior Member or Board Rep) instead.</li> <li>• Should an incumbent Community Rep decide to join Lofty as a member, their term as Community Rep shall expire upon their acceptance as a Lofty member.</li> <li>• The <i>exclusion period</i> as a Community Rep still applies; this is a moot point as their status Lofty membership takes priority over that of being a former Community Rep.</li> <li>• Said former Community Rep may submit expressions of interest to serve on Lofty's Subcommittees commensurate with their member category (viz. Full Member, Junior Member or Board Rep) upon their acceptance as a Lofty member and as Eol are called for in the normal course of business.</li> </ul>



## POLICY DOCUMENT 1.2.2

<b>Policy Name (full)</b>	Governance > Subcommittees > Membership and Administration (M&A)
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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<b>PRECIS</b>	Defines the role of the Membership and Administration (M&A) Subcommittee, along with its relationships both inside and outside of Lofty.
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### Introduction

One of our Lofty Goals is to create opportunities for all members to contribute to Lofty's operations and strategy. Lofty's operations have been grouped into a number of categories, in order to provide members with options that are focused on a relatively narrow part of the organisation.

This document defines the Membership and Administration Subcommittee ["M&A"].

Whilst the membership and administration functions may not appear closely connected on the surface, there is a significant overlap between these functions due to the amount of administration work involved with the recruiting and retention of Lofty members. As such, it makes sense to capture all Lofty administration functions within the same Subcommittee as membership.

With arguably the widest scope of all Lofty Subcommittees, M&A is a great starting point for any Lofty member looking to join their first Subcommittee.

This policy is to be read in conjunction with Policy 1.0.4 Governance > Subcommittee Parameters.

### Structure

<b>Full Member</b>	Minimum two (2), maximum four (4)
<b>Junior Member</b>	No minimum, maximum two (2)
<b>Board Rep</b>	One (1)
<b>Observer</b>	Not applicable

### Prerequisites

Policy 1.0.4 sets minimum Subcommittee prerequisites for each member category.

Whilst there are no other specific pre-requisites to serve on M&A, experience, qualifications and/or a genuine interest in one or more of the following areas is highly desirable:

- office administration, human resources, psychology/counselling and/or management;
- rudimentary computer and digital literacy, preferably with some end user knowledge of Lofty's systems and applications (including but not limited to Windows 10, Microsoft Office 2016, Google Chrome, Google Drive and G Suite); and
- demonstrable and obvious soft skills<sup>1</sup>.

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<sup>1</sup> soft skills *pl n* "desirable qualities for certain forms of employment that do not depend on acquired knowledge: they include common sense, the ability to deal with people, and a positive flexible attitude" (dictionary.com)



## Scope

Key areas that M&A is focused on in both a strategic and operational capacity:

<b>Governance</b>	<p>Ensure that Lofty's membership and administration functions remain compliant with the Community Radio Broadcasting Codes of Practice 2008 ["the Code:"], the Community Broadcasting Participation Guidelines ["the Guidelines"], the Broadcasting Services Act 1992 (Cth), Lofty's Constitution ["the Constitution"] and/or any other relevant policy and/or legislative instrument(s) as required.</p> <p>Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion.</p>
<b>Planning</b>	<p>Playing a key role, along with the Board, in the development and review of policies and strategies as required.</p> <p>Develop and execute strategies for recruiting and retaining members.</p> <p>Work with the Training &amp; Production (T&amp;P) Subcommittee in the formulation of training programs pertaining to new member inductions, as well as any other training requirements that fall outside the scope of Programming, Marketing and Community Engagement (MACE) or Technology &amp; Facilities (T&amp;F).</p>
<b>Meetings</b>	<p>Hold regular Subcommittee meetings.</p> <p>Provide the Board with timely minutes after each regular Subcommittee meeting.</p> <p>Attend Board meetings on behalf of the Subcommittee when requested and/or nominated to do so</p> <p>Make presentations at General Meetings (as required) in relation to technology or facilities matters.</p>
<b>Management &amp; Operations</b>	<p>Manage Lofty's policies and procedures relation to membership and administration.</p> <p>Design, develop and maintain policies, procedures, protocols and best practices relating to membership and administration functions.</p> <p>Act as the Board's delegate in relation to Membership and Administration decisions and actions.</p> <p>First point of contact for the following:</p> <ul style="list-style-type: none"><li>• internal conflict resolution as defined in Policy Subfamily 3.4</li><li>• listener complaints as defined in Policy Family 6</li></ul>

- health, safety and welfare (HS&W) issued raised by others
- other general enquiries fielded to Lofty via telephone, email, social media or in person

Ensure that general technology/equipment faults and/or maintenance items, either self-identified or reported by other Lofty members, are logged in a timely manner.

Liaise with the Production & Training (P&T) team to assist in the delivery of induction training for new members, along with the development of other potential training programs that may be beneficial of Lofty and its members/volunteers

<b>Administrative</b>	<p>Carry out and/or delegate administrative duties as assigned</p> <p>Update and maintain Lofty's registers and other supporting documentation</p>
<b>Media</b>	<p>Members of this Subcommittee are prohibited from speaking to the media on Lofty's behalf, unless the Board has delegated one or more named Subcommittee members to speak on a specialised topic, where the Board believes said skills and expertise of the delegated media representative would present Lofty in a professional and credible manner.</p>
<b>Promotion</b>	<p>Promote the organisation in the community as opportunities arise.</p>
<b>Negotiation</b>	<p>Negotiation with the Lofty Board and/or with external stakeholders as delegated by the Lofty Board from time to time</p>
<b>Legal</b>	<p>Ensure that</p> <ul style="list-style-type: none"> <li>• proactively identify HS&amp;W issues as they emerge, along with assisting in addressing any HS&amp;W issues as they are raised by others.</li> <li>• assist with legal reporting requirements as required from time to time</li> <li>• the performance of all legal requirements within membership and/or administration scope is reported to the Board</li> <li>• the performance of all legal within membership and/or administration scope is fully documented.</li> <li>• audits of Lofty's policies and procedures (Code checklist, CBAA Health Check) are completed and submitted to the Board as required</li> <li>• reported faults and/or outstanding maintenance issues are followed up by Technology &amp; Facilities (T&amp;F) in a timely manner</li> </ul>

**Finance**

Process cash payments for goods and services, including but not limited to membership fees, as and when they occur.

Assist the Treasurer and/or Secretary with book keeping and/or banking functions where required.

**Internal relationships**

- Board
- Production & Training (P&T) Subcommittee
- Technology & Facilities (T&F)
- Programming Subcommittee
- Presenters
- All other members and volunteers

**External relationships**

- Mount Barker RA1 residents



## POLICY DOCUMENT 1.2.3

<b>Policy Name (full)</b>	Governance > Subcommittees > Production & Training (P&T)
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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<b>PRECIS</b>	Defines the role of the Production & Training Subcommittee, along with its relationships both inside and outside of Lofty.
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### Introduction

One of our Lofty Goals is to create opportunities for all members to contribute to Lofty's operations and strategy. Lofty's operations have been grouped into a number of categories, in order to provide members with options that are focused on a relatively narrow part of the organisation.

This document defines the Production & Training Subcommittee ["P&T"].

This policy is to be read in conjunction with Policy 1.0.4 Governance > Subcommittee Parameters.

### ***Rationale for combining Production and Training within one Subcommittee***

To be successful in a Production role, a member/volunteer needs to feel comfortable with a whole gamut of technologies used to create and broadcast material. This comfort is gained by exposing oneself to the technologies for longer, which in turn leads to an acquisition of knowledge and opportunities to experiment with more advanced features and techniques.

As such, it makes sense that those in the Lofty cohort with the most comprehensive knowledge of a sizable chunk of our operation are suitably qualified to design and implement training to enable others within Lofty to build their technical and production skills, which may inevitably result in production specialists becoming the most effective trainers in Lofty.

At times, other Subcommittees will work with P&T to develop training where said other Subcommittee has a greater working knowledge. For example, the Membership & Admin Subcommittee (M&A) has responsibility for developing materials and rolling out training for new member induction. This makes sense as new member induction is one of M&A's roles. In this case, P&T would have relatively minor input into the training material itself, but still oversees the development and implementation of this material.

### Structure

<b>Full Member</b>	Minimum two (2), maximum four (4)
<b>Junior Member</b>	No minimum, maximum two (2)
<b>Board Rep</b>	One (1)
<b>Observer</b>	N/A

### Prerequisites

Policy 1.0.4 sets minimum Subcommittee prerequisites.

Whilst there are no other specific pre-requisites to serve on P&T, experience, qualifications and/or a genuine interest in one or more of the following areas is highly desirable:

- audio production, sound engineering, radio broadcasting, information technology, workplace training, education/academia, and/or technical writing;
- sound computer and digital literacy, with a willingness to learn how to use Lofty's technology, including the desire to experiment with our technology and being comfortable with learning from one's own mistakes<sup>1</sup>;
- ability to interpret relatively complex technical concepts and translate them into an easily digestible format;
- demonstrable and obvious soft skills<sup>2</sup>.

## Scope

Key areas that Production and Training is focused on in both a strategic and operational capacity:

<b>Governance</b>	<p>Ensure that Lofty's programming remains compliant with the Community Radio Broadcasting Codes of Practice 2008 ["the Code:"], the Community Broadcasting Participation Guidelines ["the Guidelines"], the Broadcasting Services Act 1992 (Cth), Lofty's Constitution ["the Constitution"] and/or any other relevant policy and/or legislative instrument(s) as required.</p> <p>Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion.</p>
<b>Planning</b>	<p>Playing a key role, along with the Board, in the development and review of Lofty's Production and Training strategies, and any other such plans as required.</p>
<b>Meetings</b>	<p>Hold regular Subcommittee meetings.</p> <p>Provide the Board with timely minutes after each regular Subcommittee meeting.</p> <p>Attend Board meetings on behalf of the Subcommittee when requested and/or nominated to do so</p> <p>Make presentations at General Meetings (as required) in relation to technology or facilities matters.</p>
<b>Management &amp; Operations</b>	<p>Manage Lofty's production and training related policies and procedures.</p> <p>Design, develop and maintain production and training policies, procedures, protocols and best practices.</p>

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<sup>1</sup> There are no mistakes, just happy little accidents.

<sup>2</sup> soft skills *pl n* "desirable qualities for certain forms of employment that do not depend on acquired knowledge: they include common sense, the ability to deal with people, and a positive flexible attitude" (dictionary.com)

Act as the Board's delegate in relation to production and training decisions.

Provide training to interested Lofty people re: production techniques.

Administration and Level 1 Tech Support for Lofty's playout system, RadioDJ.

Ensure that system or equipment faults relating to production and training functions are logged in a timely manner.

Work with MACE to produce high quality announcements and other on-air material for broadcast.

Liaise with other subcommittees team to assist in the delivery of their respective training programs.

**Administrative**      Ensure that all training materials are kept up to date and stored in a central repository

Carry out administrative duties as assigned

**Media**              Members of this Subcommittee are prohibited from speaking to the media on Lofty's behalf, unless the Board has delegated one or more named Subcommittee members to speak on a specialised topic, where the Board believes said skills and expertise of the delegated media representative would present Lofty in a professional and credible manner.

**Promotion**        Promote the organisation in the community as opportunities arise.

**Negotiation**      Negotiation with the Lofty Board and/or with external stakeholders as delegated by the Lofty Board from time to time

**Legal**              Ensure that

- all material produced by Lofty is compliant with the Code and the Act
- any breaches or potential breaches of the Code and/or Act are captured and dealt with via the appropriate channels
- consider and resolve listener complaints pursuant to Policy Family 6 (Listener Complaints)
- assist with programming-related legal reporting requirements as required from time to time viz. investigations into listener complaints, reporting as requested by music rights holders (APRA AMCOS, PPCA).
- the performance of all legal requirements within production and training scope is reported to the Board



- the performance of all legal requirements within production and training scope is fully documented.
- reported faults are followed up by Technology & Facilities (T&F) in a timely manner

## **Finance**

Liaise with the Board in relation to funding requirements for production resources, on-air presenter training and/or other costs arising in the normal course of Lofty's on-air functions.

Identify production and/or training related grant opportunities as and when available.

## **Internal relationships**

- Board
- Programming Subcommittee
- Marketing and Community Engagement (MACE)
- Technology & Facilities (T&F)
- Membership & Admin (A&M) Subcommittee
- Presenters
- All other members and volunteers

## **External relationships**

- Mount Barker RA1 residents



## POLICY DOCUMENT 1.2.4

<b>Policy Name (full)</b>	Governance > Subcommittees > Programming
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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<b>PRECIS</b>	Defines the role of the Programming Subcommittee, along with its relationships both inside and outside of Lofty.
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### Introduction

One of our Lofty Goals is to create opportunities for all members to contribute to Lofty's operations and strategy. Lofty's operations have been grouped into a number of categories, in order to provide members with options that are focused on a relatively narrow part of the organisation.

This document defines the Programming Subcommittee.

Programming plays an important role in ensuring Lofty's broadcast material continues to meet community needs. This is done by way of evaluating new programming proposals, as well as reviewing existing programming from time to time.

This policy is to be read in conjunction with Policy 1.0.4 Governance > Subcommittee Parameters.

### Structure

<b>Full Member</b>	Minimum two (2), maximum four (4)
<b>Junior Member</b>	No minimum, maximum two (2)
<b>Board Rep</b>	One (1)
<b>Observer</b>	One (1) Community Representative ["Community Rep"]

A description of the Community Rep position is provided in Appendix A.

### Prerequisites

Policy 1.0.4 sets minimum Subcommittee prerequisites for Full Members, Junior Members and Board Reps. Appendix A sets minimum prerequisites for the Community Rep.

### Scope

Key areas that Programming is focused on in both a strategic and operational capacity:

<b>Governance</b>	Ensure that Lofty's programming remains compliant with the Community Radio Broadcasting Codes of Practice 2008 ["the Code:"], the Community Broadcasting Participation Guidelines ["the Guidelines"], the Broadcasting Services Act 1992 (Cth), Lofty's Constitution ["the Constitution"] and/or any other relevant policy and/or legislative instrument(s) as required.
	Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion

<b>Planning</b>	Playing a key role, along with the Board, in the development and review of Lofty's Programming and Training strategies, and any other such plans as required.
<b>Meetings</b>	Hold regular Subcommittee meetings.
	Provide the Board with timely minutes after each regular Subcommittee meeting.
	Attend Board meetings on behalf of the Subcommittee when requested and/or nominated to do so
	Make presentations at General Meetings (as required) in relation to technology or facilities matters.
<b>Management &amp; Operations</b>	Manage Lofty's programming related policies and procedures.
	Design, develop and maintain Programming policies, procedures, protocols and best practices.
	Act as the Board's delegate in relation to Programming decisions.
	Ensure that programming and/or broadcast-related faults reported by other Lofty members, along with members of the general public, are logged in a timely manner.
	Liaise with the Production & Training (P&T) team to assist in the delivery of training relating to program output viz. presenter training; including but not limited to basic training (e.g. studio operations, compliance) and/or intermediate training (e.g. voice coaching, copywriting).
<b>Administrative</b>	Ensure that all presenters complete and lodge Music Running Sheets in a timely and consistent manner.
	Carry out administrative duties as assigned
<b>Media</b>	Members of this Subcommittee are prohibited from speaking to the media on Lofty's behalf, unless the Board has delegated one or more named Subcommittee members to speak on a specialised topic, where the Board believes said skills and expertise of the delegated media representative would present Lofty in a professional and credible manner.
<b>Promotion</b>	Promote the organisation in the community as opportunities arise.
<b>Negotiation</b>	Negotiation with the Lofty Board and/or with external stakeholders as delegated by the Lofty Board from time to time
<b>Legal</b>	<p>Ensure that</p> <ul style="list-style-type: none"> <li>• all presenters remain compliant with the Code and the Act</li> <li>• any breaches or potential breaches of the Code and/or Act are captured and dealt with via the appropriate channels</li> <li>• consider and resolve listener complaints pursuant to Policy Family 6 (Listener Complaints)</li> <li>• assist with programming-related legal reporting requirements as required from time to time viz. investigations into listener complaints, reporting as requested by music rights holders (APRA AMCOS, PPCA).</li> <li>• the performance of all legal requirements within Programming scope is reported to the Board</li> <li>• the performance of all legal requirements within Programming scope is fully documented.</li> <li>• reported faults are followed up by Technology &amp; Facilities (T&amp;F) in a timely manner</li> </ul>
<b>Finance</b>	Liaise with the Board in relation to funding requirements for programming, on-air presenter training and/or other costs arising in the normal course of Lofty's on-air functions.
	Identify programming-related grant opportunities as and when available.

### **Internal relationships**

- Board
- Production & Training (P&T) Subcommittee
- Technology & Facilities (T&F)
- Membership & Admin (A&M) Subcommittee
- Presenters
- All other members and volunteers

### **External relationships**

- Peak community broadcasting groups (CBAA, SACBA)
- Local Government staff and elected representatives
- Community leaders
- Community organisations
- Mount Barker RA1 residents

## Appendix A

<b>Subcommittee Member Category</b>	<b>Observer (Community Rep)</b>
<i>Definition and purpose</i>	<p>The Community Rep is an independent third-party that acts as a conduit between Lofty's Programming Subcommittee and the Mount Barker RA1 community.</p> <p>This position plays an important role in ensuring Lofty continues to meet the community interest, as well as providing advice and support to encourage community participation in Lofty's operations.</p> <p>In addition to serving on the Programming Subcommittee, the Community Rep shall also facilitate focus groups consisting of community members as directed by the Programming Subcommittee and/or the Board.</p>
<i>Prerequisites</i>	<p><u>Minimum</u>: An independent third party who is a resident of Mount Barker RA1.</p> <p><u>Desirable</u>: An independent third party who is employed within Mount Barker RA1 in a Community Development<sup>1</sup> role by a Local, State or Federal Government agency or equivalent.</p> <p><u>Mandatory</u>: A genuine desire to establish and maintain Lofty's position as an important cultural and community asset for the Adelaide Hills.</p>
<i>Appointment</i>	<p>At the Board's discretion, a suitable Community Rep may either be identified and approached by Lofty or recruited via a public expression of interest (Eol) call.</p> <p><i>Unsuccessful public Eol applicants may opt-in for invites to participate in future community focus groups as run by Lofty from time to time.</i></p>
<i>Term</i>	<p>Where a Community Rep is either a resident of Mount Barker RA1 or is employed within Mount Barker RA1 in Community Development role on a permanent full-time or permanent part-time basis:</p> <p><u>Maximum 12 months.</u></p> <p>Where a Community Rep is employed within Mount Barker RA1 in Community Development role on a fixed-term contract basis:</p> <p><u>Maximum of either 12 months or the expiration date of their current employment contract, whichever occurs first.</u></p> <p>Where a Community Rep is employed within Mount Barker RA1 in Community Development role on a casual basis:</p> <p><u>Maximum of either 12 months or upon ceasing employment in their current Community Development role, whichever occurs first.</u></p>
<i>Concurrent Service</i>	N/A
<i>Special conditions</i>	<ul style="list-style-type: none"> <li>• A Community Rep has no voting rights.</li> </ul>

<sup>1</sup> <https://aifs.gov.au/cfca/publications/what-community-development>

	<ul style="list-style-type: none"> <li>• A Community Rep shall not be remunerated for their service on the Programming Subcommittee, in accordance with Rule 63 of the Lofty Constitution.</li> <li>• A Community Rep may be excluded from meeting proceedings where an item of a sensitive, commercial-in-confidence or otherwise confidential nature (as determined by the Board and/or Subcommittee) is to be considered.</li> <li>• For policy purposes, a Community Rep shall be subject to the same conditions as any other volunteer; specifically, Policy Family 3 (Participation).</li> </ul>
<i>Special conditions – end of term</i>	<ul style="list-style-type: none"> <li>• An incumbent Community Rep may resign from the position prior to serving their full term by giving Lofty a minimum of two (2) weeks written notice.</li> <li>• Lofty may replace the incumbent Community Rep prior to the expiry of their full term if (a) Lofty gives the incumbent Community Rep a minimum of two (2) weeks written notice and (b) Lofty has already selected a replacement Community Rep.</li> </ul>
<i>Special conditions – exclusion period</i>	<ul style="list-style-type: none"> <li>• To maintain diversity in the expression of community interest, the Community Rep shall be subject to an exclusion period upon the expiration of their term.</li> <li>• The outgoing Community Rep may not be reappointed for a minimum of three (3) years from the expiry date of said term.</li> <li>• When giving consideration to reappointing a former Community Rep after their exclusion period has elapsed, Lofty is to confirm that said Community Rep still fulfils the prerequisites for the Community Rep role prior to reappointment.</li> </ul>
<i>Special conditions – Lofty membership</i>	<ul style="list-style-type: none"> <li>• Current Lofty members are ineligible to serve in a Community Rep role, as their member status permits them to seek an appointment to a Lofty Subcommittee commensurate with their member category (viz. Full Member, Junior Member or Board Rep) instead.</li> <li>• Should an incumbent Community Rep decide to join Lofty as a member, their term as Community Rep shall expire upon their acceptance as a Lofty member.</li> <li>• The <i>exclusion period</i> as a Community Rep still applies; this is a moot point as their status Lofty membership takes priority over that of being a former Community Rep.</li> <li>• Said former Community Rep may submit expressions of interest to serve on Lofty's Subcommittees commensurate with their member category (viz. Full Member, Junior Member or Board Rep) upon their acceptance as a Lofty member and as EoI are called for in the normal course of business.</li> </ul>



## POLICY DOCUMENT 1.2.5

<b>Policy Name (full)</b>	Governance > Subcommittees > Technology & Facilities
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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<b>PRECIS</b>	Defines the role of the Technology & Facilities (T&F) Subcommittee, along with its relationships both inside and outside of Lofty.
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### Introduction

One of our Lofty Goals is to create opportunities for all members to contribute to Lofty's operations and strategy. Lofty's operations have been grouped into a number of categories, in order to provide members with options that are focused on a relatively narrow part of the organisation.

Whilst each function of Lofty is interdependent with almost every other function, grouping said functions in this manner allows each Subcommittee to focus on their specialist area, and frees up the Board to continue guiding Lofty in a more holistic manner, without being bogged down on one small part of the enterprise.

This document defines the Technology & Facilities Subcommittee ["T&F"].

T&F is responsible to ensuring that Lofty's members can work, create, broadcast and interact in a safe and effective studio environment. T&F is responsible for everything from making sure that everything from the transmitter to the bathroom works as intended.

This policy is to be read in conjunction with Policy 1.0.4 Governance > Subcommittee Parameters.

### Structure

<b>Full Member</b>	Minimum two (2), maximum four (4)
<b>Junior Member</b>	No minimum, maximum two (2)
<b>Board Rep</b>	One (1)
<b>Observers</b>	No minimum or maximum, to be invited on a casual basis as required

A description of each Subcommittee member category can be found in Policy 1.0.4.

### Pre-requisites

Policy 1.0.4 sets minimum Subcommittee prerequisites for each member category.

Whilst there are no other specific pre-requisites to serve on T&F, experience, qualifications and/or a genuine interest in one or more of the following areas is highly desirable:

- electronics, either as a professional or a hobbyist;
- radio frequency (RF) communications, either as a professional or amateur;
- information technology (IT), either as a professional or a hobbyist, in disciplines including but not limited to networking, database administration or coding (Windows and/or Linux);

- construction-related trades including electrical, telecommunications, plumbing, building, cabinetmaking, carpentry, welding or similar; and/or
- do-it-yourself (DIY) projects, home renovation or similar.

## Scope

Key areas that T&F are focused on in both a strategic and operational capacity

<b>Governance</b>	Ensure that Lofty's facilities and equipment are maintained in good order
	Ensure that Lofty's transmission infrastructure operates within safe RF emissions limits, as specified in both apparatus manuals and in Lofty's Broadcast Service and Apparatus Licences
	Ensure, in partnership with the Board, that the organisation operates in an ethically, environmentally, and socially responsible fashion
<b>Planning</b>	Playing a key role, along with the Board, in the development and review of Lofty's Technology Plan, Health & Safety Plan and any other such plans as required.
<b>Meetings</b>	Hold regular Subcommittee meetings
	Provide the Board with timely minutes after each regular Subcommittee meeting
	Attend Board meetings on behalf of the Subcommittee when requested and/or nominated to do so
	Make presentations at General Meetings (as required) in relation to technology or facilities matters
<b>Management &amp; Operations</b>	Manage Lofty's technology and facility related policies and procedures
	Maintain, repair, upgrade and install RF, IT, communications and other related equipment
	Ensure that faults reported by other Lofty members, along with members of the general public, are logged and rectified in a timely manner
	Act as the Board's delegate in relation to engaging external suppliers or trades where a specific compliance or H&S issue needs addressing, but Lofty lacks internal resources with which to address said issue
	Liaise with the Production & Training (P&T) team to assist in the delivery of training in the use of new or upgraded equipment or systems as appropriate
<b>Administrative</b>	Carry out administrative duties as assigned
<b>Media</b>	Members of this Subcommittee are prohibited from speaking to the media on Lofty's behalf, unless the Board has delegated one or more named Subcommittee members to speak on a specialised topic, where the Board believes said skills and expertise of the delegated media representative would present Lofty in a professional and credible manner.
<b>Promotion</b>	Promote the organisation in the community as opportunities arise
<b>Negotiation</b>	Negotiation with the Lofty Board and/or with external stakeholders as delegated by the Lofty Board from time to time
<b>Legal</b>	<p>Ensure that</p> <ul style="list-style-type: none"> <li>● Lofty's transmission infrastructure is regularly tested to ensure operation within the parameters set in Lofty's Apparatus Licence and Broadcast Service Licence</li> <li>● maintenance records and asset register are kept up to date</li> <li>● fault reporting and rectification records are kept up to date</li> <li>● safe custody of the Broadcast Service Licence and Apparatus Licence and specifications of the same</li> </ul>



	<ul style="list-style-type: none"> <li>• all software licences, domain names, web hosting and other technology-related subscriptions are kept up to date</li> <li>• the performance of all legal requirements within T&amp;F scope is reported to the Board</li> <li>• the performance of all legal requirements within T&amp;F scope is fully documented.</li> </ul>
<b>Finance</b>	Liaise with the Board in relation to funding requirements for repairs, maintenance, upgrades and/or acquisition of equipment and/or facilities
	Ensure that all policies and procedures in relation to the procurement of products and/or services relating to the repairs, maintenance, upgrades and or acquisition of equipment and/or facilities are adhered to

### Internal relationships

- Board
- Production & Training (P&T) Subcommittee
- Programming Subcommittee
- Membership & Admin (A&M) Subcommittee
- Presenters
- All other members

### External relationships

- Regulators (ACMA)
- Equipment suppliers
- Trades e.g. electricians, plumbers, telecommunications technicians, RF technicians etc



## POLICY DOCUMENT 1.3.1

<b>Policy Name (full)</b>	Governance > Financial Management > Funding Sources and Application
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

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**PRECIS**      A practical interpretation of Rule 56 of the Lofty Constitution.

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### Introduction

Policy Document 1.0.3 introduced the alignment of financial management functions to rules contained within Part G of the Constitution. This alignment creates an opportunity to translate said rules into simpler language.

This policy is aligned with Rule 56 (Funding Sources and Application).

### Policy and Constitution Alignments

Rule	Policy
56(a)	<p>Lofty's funding comes from one or more of the following sources:</p> <ul style="list-style-type: none"><li>• membership fees</li><li>• donations</li><li>• sponsorship</li><li>• access fees</li></ul> <p>Other funding sources may also be considered, including but not limited to grants and listener subscriptions.</p> <p>The Board may consider other funding sources subject to the approval of the Lofty member base, with said approval granted by way of resolution passed at a General Meeting. This is discussed in the <i>Approval of unlisted funding sources</i> section of this policy.</p>
56(b)	<p>Where funds are paid to Lofty in the form of cash and/or cheque, these funds are to be deposited into Lofty's bank account as soon as practicable.</p>
56(c)	<p>1. Where funds are paid to Lofty in the form of cash and/or cheque in person, a receipt is to be immediately issued to the payee.</p> <p>2. Where funds are paid to Lofty in the form of a cheque/money order via mail, a receipt is to be issued as soon as possible via email. Should Lofty not have an email address for the remitter, a printed receipt shall be posted within five (5) working days of the cheque being received.</p>
56(d)	<p>Unless the funds received are earmarked for a specific purpose (e.g. a grant to purchase equipment), funds received by Lofty are to be used for Lofty's operational requirements. Funds that are surplus to Lofty's current operating requirements are to be retained for future use.</p>

## **Approval of unlisted funding sources**

Rule 56(a) defines several of the most common funding sources pertaining to an organisation such as Lofty. However, there may be times when Lofty is offered funds for a specific purpose, or a potential new ongoing funding source may become available.

In these instances, the members of Lofty are to vote on whether or not to accept these proposed sources by way of passing a resolution at a General Meeting.

One-off funding for a specific purpose (such as a grant) is to be considered as an isolated transaction. Should the motion be passed (or not), the Board is to take the motion as authorisation for the said transaction only.

When a new category of ongoing funding is under consideration (such as an online platform allowing for regular pledges to be made to Lofty from supporters), the resolution is to be drafted in such a way that should said resolution be passed, it will be treated in the same manner other funding sources specified in Rule 56(a). Said resolution shall remain in force until a resolution to cease using this funding source is passed or said funding source is specified in the next version of the Lofty Constitution, whichever occurs first.



## POLICY DOCUMENT 1.3.2

**Policy Name (full)** Governance > Financial Management > Insurances  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** A practical interpretation of Rule 57 of the Lofty Constitution.

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### Introduction

Policy Document 1.0.3 introduced the alignment of financial management functions to rules contained within Part G of the Constitution. This alignment creates an opportunity to translate said rules into simpler language.

This policy is aligned with Rule 57 (Insurances).

### Policy and Constitution Alignments

Rule	Policy
57(a)	Lofty must hold all insurance policies as mandated by all legislative instruments and industry codes affecting Lofty's operations.
57(b)	In addition to minimum mandated insurance coverage, Lofty may take out additional insurances to protect the interests of Lofty and/or its members, as per Lofty's Insurance Policy Policy.

### Insurance Policy Policy

Our insurance policies are renewed annually. At each renewal notice, the Treasurer is to review the notice and confirm that the risks insured continue to provide Lofty and its members with sufficient coverage.

At each renewal notice, the Treasurer is to confirm that Lofty's current insurance provider is currently aligned with the Community Broadcasting Association of Australia (CBAA). Should the insurer no longer be aligned, the Treasurer is to seek an alternative quote from the CBAA's current recommended insurance provider for comparison with the renewal notice received from the incumbent provider.

Any recommendations to alter the insured risks, including but not limited to increasing or decreasing insured limits and/or accepting a quote from a new insurance provider, are to be referred to the Board prior to acceptance. This applies to alterations recommended either by the Treasurer as a result of their review, or by the insurer as documented in the renewal notice.

Lofty's current Coverage Summary as provided by our insurer is contained in Appendix A. Members may obtain a copy of the full policy wording viz. Product Disclosure Statement (PDS) by request.

## Insured Risk Standards

The risks that Lofty insures for are contained in the below table.

Insured risk	Lofty's minimum standard
Professional Liability	Provided
Management Liability	Provided
Association Liability	Provided
Employment Practices Liability	Provided
Employee Fraud or Dishonesty	\$100,000 per claim
Unintentional Defamation	TBC
Public Liability	\$10,000,000
Molestation Liability	\$5,000,000
Property in Lofty's Care	\$50,000
Volunteers Personal Accident	Provided
Volunteer Motor	Provided
Building Insurance	Covered by Strata



## POLICY DOCUMENT 1.3.3

**Policy Name (full)** Governance > Financial Management > Banking  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** A practical interpretation of Rule 58 of the Lofty Constitution.

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### Introduction

Policy Document 1.0.3 introduced the alignment of financial management functions to rules contained within Part G of the Constitution. This alignment creates an opportunity to translate said rules into simpler language.

This policy is aligned with Rule 58 (Banking).

### Policy and Constitution Alignments

Rule	Policy
58(a)	Lofty currently holds a Society Cheque Account with BankSA.
58(b)	Whilst each Board member is encouraged to act as a signatory to Lofty's bank accounts, this is not compulsory. For the purposes of Rule 58(b), "signatory" means an authorised signatory to Lofty's Society Cheque Account and/or an authorised user of BankSA's Business Banking Online (BBO).
58(c)	Two (2) authorised signatories are required to sign a direct debit form, standing order or similar. Two (2) authorised users of BBO are required to process withdrawal via electronic funds transfer (EFT).
58(d)	Two (2) authorised signatories are required to sign a cheque.
58(e)	An outgoing Board Member is to be removed as an authorised signatory and/or authorised user of BBO as soon as possible; preferably within seven (7) days of leaving their position.
58(f)	An incoming Board Member is to be added as an authorised signatory and/or authorised user of BBO as soon as possible, unless otherwise agreed with the Board; preferably within seven (7) days of commencing in their new position.
58(g)	A Lofty Member may request details of Lofty's banking records by contacting either the Station Manager or the Treasurer, who will endeavour to fulfil the request via email as soon as practicable. Where the requested document is not available in electronic form, the Station Manager or the Treasurer is to make arrangements with the Member to allow the Member to view a hard copy of the records at Lofty's premises as soon as practicable.

## **Adding and removing authorised signatories**

To facilitate the efficient and compliant amendment of signatories on bank accounts held by incorporated associations, BankSA requires a copy of the minutes from a meeting where a motion has been carried to add or remove a signatory from the association's account.

This process is common across most Approved Deposit-taking Institutions (ADIs) in Australia to ensure that said ADI meets its obligations under Anti Money Laundering/Counterterrorism Finance (AML/CTF) and Know Your Customer (KYC) legislation.

A newly appointed approved signatory will need to identify themselves with BankSA. The identification process may vary depending on whether or not the new signatory is a current BankSA customer. Please refer to the BankSA website ([banksa.com.au](http://banksa.com.au)) for more information.

### *As the result of a Board Member's election at an Annual General Meeting (AGM)*

Immediately after the election of new Board Members at an AGM, the following motion is to be put forward:

1. Each newly elected Board Member is to be added as an authorised signatory on Lofty's Society Cheque Account and as an authorised user of BBO.
2. Each outgoing Board Member is to be removed as an authorised signatory on Lofty's Society Cheque Account and as an authorised user of BBO.

### *As the result of a motion passed at a Board Meeting*

The motion to add or remove an authorised signatory and/or authorised user of BBO is to be minuted; please note that BankSA will require a copy of these minutes before adding a new authorised signatory.

The Treasurer and Secretary are authorised to add a new authorised user of BBO for the purposes of acting as a second signatory for online debit transactions.



## POLICY DOCUMENT 1.3.4

<b>Policy Name (full)</b>	Governance > Financial Management > Payments and Purchases
<b>Policy Family</b>	1 – Governance
<b>Version/Date</b>	V1.0 21 May 2019
<b>Maintained By</b>	Board

**PRECIS** A practical interpretation of Rules 59 and 60 of the Lofty Constitution.

### Policy and Constitution Alignments

Rule	Policy
59(a)	Two (2) authorised signatories are required to authorise payments.
59(b)	A Lofty member may be entitled to a payment under the following circumstances: <ol style="list-style-type: none"> <li>1. <i>Reimbursement</i> for goods and services purchased on behalf of Lofty where said member has been authorised to make said purchase.</li> <li>2. A <i>referral fee (commission)</i> may be paid to a Lofty member as the result of successfully referring a sponsor to us.</li> </ol>
59(c)	If a Lofty member purchases goods and services on behalf of Lofty without prior authorisation, said goods and services will be considered to be a gift to Lofty (and will be greatly appreciated).
59(d)	Further information relating to referral fees (commissions) is available in Policy.
60(a)	A standing authorisation permitting the Chair, Vice-Chair, Secretary or Treasurer to purchase goods or services on behalf of Lofty without further reference to the Board or the members, subject to the following limits: <ul style="list-style-type: none"> <li>• Maximum \$50 per transaction</li> <li>• Maximum six (6) transactions per financial year</li> <li>• Maximum aggregate sum of \$150 per financial year</li> </ul>
60(b)	Purchases of goods or services on behalf of Lofty of between \$50 and \$1,000 each are to be approved by the Board before proceeding.
60(c)	Purchases of goods or services on behalf of Lofty over \$1,000 each are to be approved by Lofty Members by way of a motion carried at a general meeting.
60(d)	All amounts quoted in this policy are exclusive of Goods and Services Tax (GST).
60(e)	Capital items are to be recorded in Lofty's Asset Register.
60(f)	Where a member has made a purchase on behalf of Lofty and is seeking reimbursement pursuant to Rule 59(c): <ol style="list-style-type: none"> <li>1. Authorisation to make the purchase must be in writing.</li> <li>2. The goods or services have been delivered to Lofty.</li> <li>3. The member has submitted a receipt for reimbursement.</li> </ol>
60(g)	Where a member is entitled to a payment and is also an authorised signatory or authorised user of BBO, said member is prohibited from acting as one of the signatories for the purpose of authorising said payment.





## POLICY DOCUMENT 1.3.5

**Policy Name (full)** Governance > Financial Management > External Audit  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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### PRECIS

A practical interpretation of Rule 61 of the Lofty Constitution.

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### Introduction

Policy Document 1.0.3 introduced the alignment of financial management functions to rules contained within Part G of the Constitution. This alignment creates an opportunity to translate said rules into simpler language.

This policy is aligned with Rule 61 (Appointment of an Auditor).

### Policy and Constitution Alignments

Rule	Policy
61(a)	Acknowledges Lofty's obligation to appoint an external auditor should Lofty's annual revenue exceed \$500,000; being the threshold for Lofty to be deemed a <i>prescribed association</i> in terms of the Associations Incorporation Act 1985 (the Act) as at the time of writing.
61(b)	Should Lofty's members wish to appoint an external auditor whilst Lofty's annual revenue is below the threshold described in 61(a), they may do so by way of carrying a motion to appoint an external auditor at an Annual General Meeting (AGM).
61(c)	Should an external auditor be appointed pursuant to 61(b), said auditor's term of appointment is to commence immediately from the AGM until the next AGM, at which time a new motion to appoint an external auditor will need to be carried.
61(d)	The Board may appoint an external auditor where: 1. Required to do so in terms of Rule 61(a); or 2. A resolution is passed at an AGM to appoint an external auditor <i>and</i> delegate the selection of said external auditor to the Board.
61(e)	The appointed external auditor shall hold the qualifications stipulated in the Act.
61(f)	The appointed external auditor shall have all powers conferred to them in the Act, irrespective of whether or not Lofty is deemed to be a prescribed association.



## POLICY DOCUMENT 1.3.6

**Policy Name (full)** Governance > Financial Management > Asset Register  
**Policy Family** 1 – Governance  
**Version/Date** V1.0 21 May 2019  
**Maintained By** Board

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**PRECIS** A practical interpretation of Rule 62 of the Lofty Constitution.

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### Introduction

Policy Document 1.0.3 introduced the alignment of financial management functions to rules contained within Part G of the Constitution. This alignment creates an opportunity to translate said rules into simpler language.

This policy is aligned with Rule 62 (Asset Register).

### Policy and Constitution Alignments

Rule	Policy
62(a)	A record of Lofty's capital items (assets) is held on the Asset Register.
62(b)	Lofty's Asset Register is currently held in a secured Excel file on the Lofty Board shared folder. Should a Lofty member wish to view the current Asset Register, a request is to be made to the Station Manager or Treasurer. A PDF copy of the Asset Register shall be emailed to the member as soon as practicable.

### Asset Register

Lofty's Asset Register serves two main purposes:

- A record of assets acquired by Lofty including details such as acquisition date, physical location and serial number (where applicable), along with accounting information including base cost and depreciation estimates (Assets-Owned).
- A record of assets on loan to Lofty from other entities, including SACBA (Assets-On Loan).

At some point in the future, we expect Lofty's Asset Register to be expanded to cater for Lofty assets on loan to other entities, along with a record of disposal of assets that are of no further use.

#### *Assets-Owned*

The following data is captured in the Assets-Owned section of the Asset Register.

Field	Purpose
Asset no.	Identifies the asset in loose chronological order.
Date Acquired	Assists in forecasting asset lifespan for both accounting and practical purposes.
Description	A brief but descriptive summary of the item.
Location	Where the asset is located in relation to Lofty's premises.
Serial No.	Recorded for insurance and warranty purposes (where applicable).
Cost	Recorded for accounting (depreciation) purposes.
Dep'n (%)	Depreciation rate in terms of relevant Australian Tax Office (ATO) rulings.

## Assets-On Loan

The following data is captured in the Assets-Owned section of the Asset Register.

Field	Purpose
Date Borrowed	The date Lofty took possession of the loaned asset from its owner.
Lender	The owner of the asset.
Description	A brief but descriptive summary of the item.
Location	Where the asset is located in relation to Lofty's premises.
Serial No.	Recorded for insurance and warranty purposes (where applicable).
Due Date	When the owner expects their item to be returned. May be open-ended (TBA).

## Multiples vs Sets

Where an asset is one of multiple examples of a particular item (such as a specific model of PC or laptop), each item is treated as a separate asset. Where an asset is made up of several items in a set (such as dining chairs), the asset is treated in the singular.

Serial numbers are also used as a method to determine whether multiples of an item are to be treated separately or collectively. Referring to the above example, we would treat three Dell Optiplex 9010 desktop PCs laptops as three separate items, as each PC has its own serial number.

## Small assets

Like any typical community organisation, Lofty has an array of random bits and pieces that are an asset to achieving our objectives (for example, it's a bit difficult to operate a radio station without audio cables).

Items of this nature that are of low monetary value but relatively durable (e.g. tools, cables, adaptors etc) are not *capital* items. When Lofty buys these items, they're generally considered to be part of our *repairs and maintenance* expenditure.

A simple rule of thumb<sup>1</sup> is to consider whether or not you'd expect to see the item included as a Repairs & Maintenance expense on a Profit & Loss Statement, or as a Plant & Equipment item on a Balance Sheet. If it's the latter, it's an asset viz. it's recorded in the Asset Register.

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<sup>1</sup> Assuming that the reader has a basic understanding of financial statements.

## **Appendix 17.2**

### **Membership**

Lofty Policies 3.1.1-3.1.2



## POLICY DOCUMENT 3.1.1

<b>Policy Name (full)</b>	Participation > Membership > Basic Rights and Responsibilities
<b>Policy Family</b>	3 – Participation
<b>Version/Date</b>	V1.0 21 July 2019
<b>Maintained By</b>	Membership and Admin Subcommittee (M&A)

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### PRECIS

This policy sets mutual expectations between Lofty and its members, thus enabling the shared goal of operating a successful community broadcaster to be met.

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### Background

Lofty is more than just a 100% volunteer-operated not-for-profit community broadcaster; we are also the custodians of a valuable cultural and community asset for the Adelaide Hills. We openly invite members from the local community to join us by way of membership.

Every member has a stake in Lofty's present and future, therefore it is crucial that both the member and Lofty have a clear understanding of mutual rights and responsibilities.

Conversely, we expect our members to act professionally and in good faith towards Lofty at all times. We expect that they hold the interests of Lofty and our community in equal regard to their own to ensure positive outcomes for themselves, our station and the community we serve.

### Purpose

The purpose of this policy is twofold:

1. To set clear and reasonable expectations of Lofty to our members.
2. To set clear and reasonable expectations of our members to Lofty.

### Why membership is important

Section 5.3 of the Community Broadcasting Participation Guidelines 2010 ("the Guidelines") states the following:

*Membership is one of the primary ways of encouraging community participation in the operations of a service.*

*Members can have a say in decision-making by:*

- ☐ *attending and voting at meetings;*
- ☐ *nominating for membership of boards and committees;*
- ☐ *participating in boards and committees; and*
- ☐ *proposing items of business for general meetings.*

## Open membership

Lofty operates an open membership model, as defined in the Guidelines. Lofty's interpretation of the Guidelines is as follows:

<i>Guidelines</i>	<i>Lofty's interpretation</i>
<p>Membership is open if it is automatic on lodgment of a membership application form and payment of the membership fee; or a licensee can only refuse membership applications on the basis of specific, transparent and reasonable criteria, and there are adequate grievance or review mechanisms for rejected applicants.</p>	<p>Lofty welcomes membership applications from the local community.</p> <p>In order to preserve Lofty's integrity as a progressive and diverse organisation offering a safe space for community participation, every membership application is individually assessed by Lofty's Membership &amp; Administration Subcommittee (M&amp;A).</p> <p>Membership eligibility criteria is set in Rules 15 and 16 of the Lofty Constitution.</p> <p>In the event that Lofty declines a membership application, the applicant is entitled to appeal in terms of Rules 48 and 49 of the Constitution.</p>
<p>Examples of specific and reasonable criteria for the refusal of membership applications are:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> reasonable grounds to believe the applicant: <ul style="list-style-type: none"> <li>o would not abide by the licensee's rules and objects</li> <li>o would not abide by the codes of practice</li> <li>o would pose a security risk to members, property or premises</li> </ul> </li> <li><input type="checkbox"/> the applicant has been convicted of a serious offence.</li> </ul>	<p>Rule 16(b) of the Lofty Constitution sets the following circumstances under which a membership application may be rejected:</p> <ul style="list-style-type: none"> <li>i. there are reasonable grounds to believe that the applicant would not abide by the Rules and objectives of the Association;</li> <li>ii. (as) required by law; or</li> <li>iii. the applicant has been convicted of an indictable offence;</li> <li>iv. the applicant is subject to a current court order or legal proceedings, either criminal or civil, that may prejudice their ability to participate in the Association;</li> <li>v. there are reasonable grounds to believe that the applicant would not abide by the Community Radio Broadcasting Codes of Practice (2008);</li> <li>vi. there are reasonable grounds to believe that the applicant would pose a security risk and/or an existential threat to the Association, its members and/or its premises;</li> <li>vii. the applicant has been pre-assessed as posing a significant risk to the Association pursuant to Rules 16(b)(i), 16(b)(v) or 16(b)(vi).</li> </ul>

## **Constitution**

As each Lofty member is obligated to adhere to the rules of the Lofty Constitution, we *strongly* recommend that a potential new member reads the Constitution prior to expressing an interest in membership.

The Lofty Constitution shall be freely available to any interested party in terms of Policy 1.0.1 Corporate Governance > Constitution.

## **Board membership**

Every Lofty member aged 18 years or over shall have the right to nominate for Board elections pursuant to Rule 26 of the Lofty Constitution.

## **Subcommittees**

Every Lofty member shall have the right to nominate for Subcommittee membership.

Subcommittees shall operate pursuant to Rules 33 and 34 of the Lofty Constitution, as well as Policy Family 1.2 (Corporate Governance > Subcommittees).



## POLICY DOCUMENT 3.1.2

<b>Policy Name (full)</b>	Participation > Membership > New member recruitment
<b>Policy Family</b>	3 - Participation
<b>Version/Date</b>	V1.0 15 July 2018
<b>Maintained By</b>	Board

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### PRECIS

In order to grow and thrive, Lofty encourages new members from our local community to join us. This policy defines how we do this and how this aligns with the Community Radio Broadcasting Codes of Practice 2008 and the Community Radio Participation Guidelines 2010.

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### Introduction

As per the Lofty Constitution, one of the Association's objectives is to provide the opportunity for community members to participate in the production and presentation of original programs.

In addition to on-air roles, members are encouraged to build their skills by participating in other aspects of Lofty's operations, including but not limited to Board positions.

This policy has been formulated in order to grow Lofty's member base in a manner that encourages community participation in a safe and sustainable manner; where every member is provided with opportunities become highly skilled in multiple disciplines required to run a successful community broadcaster.

Lofty operates on an *open* membership basis, as defined in the Community Radio Participation Guidelines 2010 ("the Guidelines").

### Scope and context

Policy Family 3 (Participation), whilst written with the Community Radio Broadcasting Codes of Practice 2008 ("the Codes") in mind, is applied across all of Lofty's operations.

Whilst Lofty has a broadcasting licence, our organisation is multi-faceted and constantly evolving. As such, there are always opportunities to participate in Lofty in an operational capacity and/or a strategic capacity.

#### *What the Code says*

- 2.1 Our station will make sure that people in our community who are not adequately served by other media are encouraged and assisted to participate in providing our service. We will have in place policies and procedures to support this commitment. We will document evidence of our efforts to encourage community participation.

### ***What Lofty does (and how it does it)***

We have a set journey upon which potential members travel from the time our recruitment material piques their interest through until they join us.



## The Membership Journey

The process in which an interest community member may become a Lofty member.

<i>Expression of interest</i>	<p>Expressions of interest come via our website, as well as via phone, email and social media.</p> <p>We also run campaigns seeing expressions of interest, with said campaigns promoted via a number of channels including but not limited to on-air announcements, social media advertising campaigns and local flyer distribution.</p>
<i>Information sessions</i>	<p>Prior to membership application, Lofty invites potential new members in a group situation, via a member information session.</p> <p>Member information sessions are held throughout the year, and give the potential member a chance to meet a number of other potential Lofty members, along with a number of current Lofty members. This gives a potential member a feel for Lofty's culture and ethos, and we believe it may also convey a sense of belonging to which said potential member may wish to join.</p> <p>Upcoming member information sessions are promoted via on-air announcements, via social media and via our website.</p> <p>Registrations of interest are taken via a number of methods including email, phone, social media instant messaging and word-of-mouth (e.g. drop-ins, friends/associates of current members etc).</p> <p>To establish a potential new member's interests and skills, we have an online expression of interest form on our website.</p> <p>Should the potential new member wish to continue, we will provide them with either a paper membership form or a link to our electronic membership form.</p>
<i>Membership application</i>	<p>The membership application form asks a number of standard questions, along with providing ample opportunity for the potential new member to share their experience and preferences with us.</p> <p>Whilst the questions on the membership application form surrounding experience and preferences are not compulsory and do not form part of membership assessment criteria, they may provide Lofty with valuable information on how best to engage with a new member in such a way that they are encouraged to remain a Lofty member for many years to come.</p>
<i>Confirmation of membership</i>	<p>All membership applications are reviewed by the Membership &amp; Admin Subcommittee (M&amp;A).</p> <p>Whilst Lofty operates under an open membership model, each application shall be considered and assessed pursuant to the Lofty Constitution prior to final confirmation of membership application acceptance.</p>

<i>Payment of membership fee</i>	<p>Upon acceptance of the application, the new member is sent a tax invoice for their membership.</p> <p>Membership falls due on 1 July each year, therefore a new member's first year membership fee is likely to be prorated.</p> <p>Membership fee info is contained on the membership application form.</p>
<i>Induction</i>	<p>Upon payment of the membership fee, the member is inducted into Lofty.</p> <p>The induction process includes basic health and safety training, along with the issue of a studio key to allow 24/7 access to Lofty's premises and access to Lofty's online resources i.e. lofty.org.au email address, Lofty's shared Google Drive, intranet etc.</p>
<i>Basic training</i>	<p>Training is provided to each new member commensurate with their preferred role(s). Said basic training is provided at no extra cost to the member.</p>
<i>Commencement of role(s)</i>	<p>The new member takes up their new role. For the first few shifts, a new member may be buddied up with an existing member.</p>
<i>Ongoing engagement</i>	<p>We aim to keep our members interested and engaged, and encourage every member to try different roles at Lofty – not just operational, but strategic roles as well.</p> <p>In return, Lofty asks that the member to make themselves available for ongoing training and development as and when necessary.</p> <p>Such training may be for new roles, new ways of executing existing roles, or refreshers of previous training as required.</p>

## **Appendix 17.3**

### **Internal Conflict Resolution**

Lofty Policy Subfamily 3.4

*Incorporates Participation > Rights & Obligations Policy Subfamily 3.3*



## POLICY DOCUMENT 3.4.0

**Policy Name (full)** Participation – Internal Conflict Resolution  
**Policy Family** 3 - Participation  
**Version/Date** V1.0 21 July 2019  
**Maintained By** Board

### PRECIS

Lofty has many passionate volunteers. Occasionally, this passion may lead to misunderstanding, which may lead to conflict. This document maps out Lofty's internal conflict resolution pathway. [refer Code 1.5]

### Background

Lofty is a dynamic and progressive organisation with a diverse population of passionate and enthusiastic people, each of whom is giving their time to advance the cause of Lofty. It creates an atmosphere that's electric, and shines through to the listener by way of vibrant and engaging content. However, in an electric atmosphere, sparks will inevitably fly from time to time.

### Reasons for conflict

Conflict can arise due to a myriad of reasons. The below list is not exhaustive, and it should be noted that conflicts stemming from some of the listed catalysts may be subject to additional policies as listed.

Reason (Catalyst)	Additional policies, references and resources
Disagreement re: religion or politics	Lofty Constitution, Rule 6
Bullying / Harassment (suspected or actual)	Policy 3.3.3
Sexual Harassment (suspected or actual)	Policy 3.3.2
Other Misconduct (suspected or actual)	Refer to Board or SACBA
Discriminatory speech/behaviour	Policy 3.3.1
Patronising / talking down / mansplaining	N/A
Misunderstanding / taking idiom literally	N/A

### Definitions

<i>Aggrieved</i>	The party feeling distressed, offended, upset or otherwise wronged by the <i>Source</i> .
<i>Source</i>	The party with whom the <i>Aggrieved</i> has a dispute.
<i>Lofty</i>	One or more representatives made up of Lofty Board Members and/or Management assigned to facilitate a resolution between the <i>Aggrieved</i> and the <i>Source</i> .

### Resolution Steps

Lofty's Internal Conflict resolution process consists of three levels. Under this policy, the expectation is that in most cases, the three levels are worked through in order from 1 through 3. The goal is to prevent the conflict resolution process from escalating to the next level, if and where possible.

Resolution Level	Characteristics
<b>Level 1 Informal</b>	<ul style="list-style-type: none"> <li>- May be self-managed between the Aggrieved and the Source, either directly or via a peer.</li> <li>- If the Aggrieved is uncomfortable with self-managing the conflict, they may approach Lofty to assist.</li> <li>- Where Lofty is engaged to assist, the Aggrieved party is to be kept anonymous.</li> <li>- Lofty will informally document this step where engaged in a Lofty-Assisted resolution pathway.</li> </ul>
<b>Level 2 Semi-formal</b>	<ul style="list-style-type: none"> <li>- This level is managed by Lofty, either with or without engaging an external support party.</li> <li>- May be the result of continued tension between the Aggrieved and the Source based on either a previously addressed catalyst and/or a new catalyst.</li> <li>- Requires a written description of the complaint from the Aggrieved.</li> <li>- Mediation may be requested by either the Aggrieved or the Source.</li> <li>- The Aggrieved may choose to either remain anonymous or disclose their identity to the Source.</li> <li>- Resolution (where applicable) to be documented in writing.</li> </ul>
<b>Level 3 Formal</b>	<ul style="list-style-type: none"> <li>- To be invoked either if Level 1 and 2 Resolution fails, or if the Board orders an escalation (see <i>Escalation/Bypass</i>).</li> <li>- At least one external support party shall be engaged during Level 3.</li> <li>- Anonymity of the Aggrieved is to be carefully considered on a case by case basis.</li> <li>- Where Level 3 is invoked as the result of a serious allegation, policies and procedures surrounding the management and investigation into set allegation are to be followed in conjunction with this policy.</li> <li>- <b>Failure to resolve at Level 3 will result in the conflict being upgrade to Internal Complaint status</b></li> <li>- May result in formal disciplinary action against the Source and/or other Lofty members – including the Aggrieved - in the event that Level 3 is invoked due to a long-running dispute and/or the Aggrieved has been found <i>beyond reasonable doubt</i> to be acting in a vexatious and/or unreasonable manner.</li> <li>- A Level 3 Resolution may also result in subsequent investigations being undertaken by the Board.</li> </ul>

### Escalation/Bypass

Where an internal conflict has arisen as a result of a multiple complaints made by the Aggrieved against the Source over a relatively short period of time, Lofty reserves the right to bypass Levels 1 and/or 2 and proceed to Level 3.

Only the Board has the power to escalate a complaint straight to Level 3. Such an escalation shall only proceed once external advice has been sought from one or more of the following:

- South Australian Community Broadcasting Association (SACBA);
- Community Broadcasting Association of Australia (CBAA);
- a suitably qualified legal professional (viz. solicitor); or
- any other such suitably qualified professional as the Board deems fit.

All Stage 3 resolutions are to be fully documented in writing.

## Relationship between Internal Conflict and Internal Complaint

Should the internal conflict remain unsolved after the Level 3 Formal Resolution stage, the resolution process will be terminated without a result. Furthermore, the internal conflict shall be upgraded to an internal complaint and administered pursuant to Rules 47 through 52 of the Lofty Constitution.

An internal conflict may be upgraded to an internal complaint by the Lofty Board *prior* to Level 3 Formal Resolution being terminated without result, after carefully considering the conflict and under the following circumstances:

1. One of more catalysts are deemed by the Board to be *significant catalysts*.
2. The catalyst is a repeated, persistent and/or willful action; providing a trigger for an internal complaint to be lodged pursuant to Rule 47.b viz. *A complaint may be made by any member [...] of (Lofty) that another member [...] persistently and wilfully acted in a manner prejudicial to the interests of (Lofty)*. In this instance, such behaviour risks bringing Lofty into disrepute, thus this behaviour may prejudice Lofty's interests.

Significant catalysts may include bullying, harassment (both sexual and non-sexual) and/or discriminatory speech/behaviour targeting the Aggrieved's race, religion, country of origin, gender, sexuality, political beliefs, disabilities (either visible or invisible) or a combination of two or more of these catalysts.

## Natural Justice

The principles of *natural justice* (in terms of Rule 54) shall apply at all times during the conflict resolution process.



## POLICY DOCUMENT 3.4.1

**Policy Name (full)** Participation – Internal Conflict Resolution > Resolution Level 1

**Policy Family** 3 – Participation

**Version/Date** V1.0 21 July 2019

**Maintained By** Board

### PRECIS

As described in Policy 3.4.0 (Internal Conflict Resolution), this policy describes Level 1 of Lofty's three-level internal conflict resolution process. [*refer Code 1.5*]

### Background

Policy 3.4.0 provides a primer on how conflict arises, defines the parties involved in an internal dispute and outlines Lofty's three-level internal conflict resolution process.

This policy describes Level 1 – Informal Resolution.

### Definitions

<i>Aggrieved</i>	The party feeling distressed, offended, upset or otherwise wronged by the <i>Source</i> .
<i>Source</i>	The party with whom the <i>Aggrieved</i> has a dispute.
<i>Lofty</i>	One or more representatives made up of Lofty Board Members and/or Management assigned to facilitate a resolution between the <i>Aggrieved</i> and the <i>Source</i> .

Resolution Level	Characteristics
<b>Level 1 Informal</b>	<ul style="list-style-type: none"><li>- May be self-managed between the Aggrieved and the Source, either directly or via a peer.</li><li>- If the Aggrieved is uncomfortable with self-managing the conflict, they may approach Lofty to assist.</li><li>- Where Lofty is engaged to assist, the Aggrieved party is to be kept anonymous.</li><li>- Lofty will informally document this step where engaged in a Lofty-Assisted resolution pathway.</li></ul>

In many cases, conflict can be resolved by using one of the below informal resolution approaches.

<i>Direct</i>	If you're the Aggrieved party and you feel comfortable in doing so, explain to the Source party which actions and/or words they used that caused you to feel that way. It is quite possible that the Source had no idea that they had caused any upset, and may feel embarrassed and very apologetic.
<i>Peer-Assisted</i>	In some cases, it's possible to question oneself as to whether or not one has a legitimate reason to feel slighted. In these instances, consider speaking with another volunteer to get their thoughts <i>in the strictest of confidence</i> . They may be able to give you some advice, or may even possibly be able to assist by opening up a discussion with the Source.
<i>Lofty-Assisted</i>	If neither direct nor peer-assisted conflict resolution approaches are possible or appropriate, the Lofty-Assisted pathway (described below) may be the most effective way to resolve the conflict in a swift and mutually respectful manner.



### Lofty-Assisted Informal Resolution - Summary

The Lofty-Assisted informal resolution process follows a natural chain of logic, as shown below.

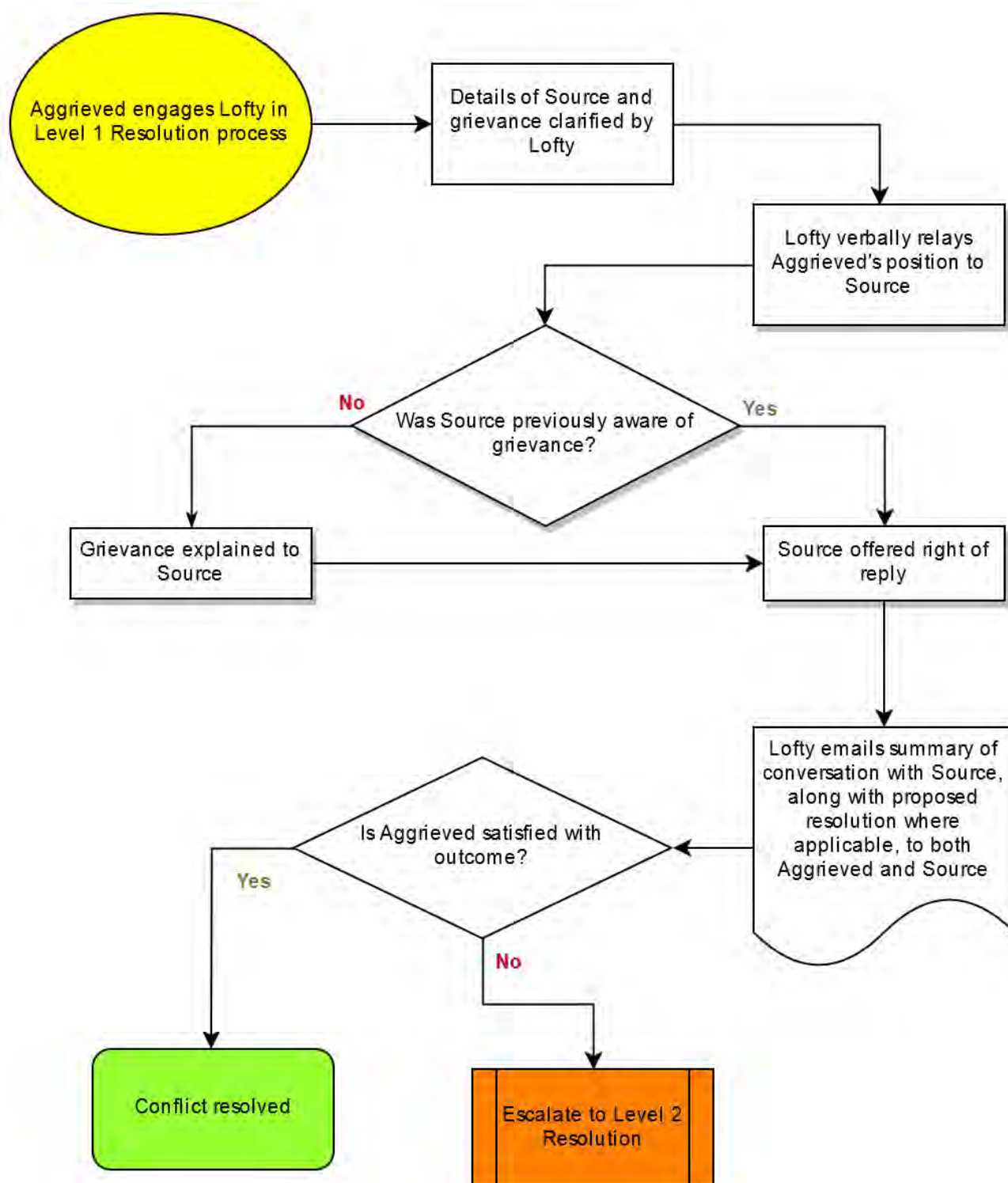


Figure 3.4.1(a) Flow diagram of Lofty-Assisted Level 1 conflict resolution pathway.



## Lofty-Assisted Informal Resolution – In Detail

<u>Step</u>	<u>Description</u>
-------------	--------------------

- |                          |   |  |    |                 |                          |  |  |
|--------------------------|---|--|----|-----------------|--------------------------|--|--|
| 1                        | The Aggrieved engages Lofty (as defined in this policy) to commence the conflict resolution process. The Aggrieved may commence this process in person, via telephone, via email, in writing, via text or via any other communication method used by Lofty in its normal course of business. As part of this engagement, the Aggrieved shall describe the actions and/or words that were the catalyst for their dispute with the Source. <i>Where possible, please provide details of the date/time of any specific incident(s) that contributed to the conflict.</i> |  |    |                 |                          |  |  |
| 2                        | Lofty is to fully confirm the Aggrieved's position prior to liaising with the Source. <i>Unless explicit written instructions are given by the Aggrieved stating otherwise, Lofty shall not reveal the Aggrieved's identity to the Source.</i>  |  |    |                 |                          |  |  |
| 3                        | Lofty shall notify the Source with the Aggrieved party's concerns as soon as practicable; preferably within seven (7) days of the Aggrieved party first presenting their concerns. Discussion in person or via telephone between Lofty and the Source is desirable.   |  |    |                 |                          |  |  |
| 4                        | The Source shall have right of reply. Where the Source proposes a resolution to the dispute, this is to be noted for communication to the Aggrieved.  |  |    |                 |                          |  |  |
| 5                        | Lofty's representative shall send the Source a follow up email from their lofty.org.au email account, summarising the points made in the verbal discussion as soon as practicable; preferably with twenty-four (24) hours of closing their discussion with the Source. <i>Failure to accurately summarise the conversation in a timely manner via email may complicate later stages of the conflict resolution process.</i>   |  |    |                 |                          |  |  |
| 6                        | Once the Source and Lofty agree on the content on said follow up email, Lofty will send the email to the Aggrieved for their consideration.   |  |    |                 |                          |  |  |
| 7                        | Upon reading and considering Lofty's email, the Aggrieved shall reply to Lofty to indicate  |  |    |                 |                          |  |  |
|                          | <table border="0"><tr><td style="background-color: #92d050; text-align: center; padding: 5px;">satisfaction</td><td style="text-align: center; padding: 0 10px;">or</td><td style="background-color: #ffcc00; text-align: center; padding: 5px;">dissatisfaction</td></tr><tr><td style="text-align: center; padding: 5px;"><b>Conflict resolved</b></td><td></td><td style="text-align: center; padding: 5px;"><b>Proceed to Level 2 Resolution process</b></td></tr></table>  | satisfaction                                 | or | dissatisfaction | <b>Conflict resolved</b> |  | <b>Proceed to Level 2 Resolution process</b> |
| satisfaction             | or  | dissatisfaction                              |    |                 |                          |  |  |
| <b>Conflict resolved</b> |   | <b>Proceed to Level 2 Resolution process</b> |    |                 |                          |  |  |

### Other rights and obligations

Lofty shall treat the conflict resolution process in the strictest of confidence.

The Aggrieved shall refrain from discussing their dispute with any other member/volunteer *unless* engaging another member/volunteer to assist in a Peer-Assisted resolution. In this instance, both the Aggrieved and the Peer shall refrain from discussing said dispute with the wider Lofty member/volunteer cohort.

Conflicts in general, and use of this conflict resolution process in particular, shall not result in either the Aggrieved and/or the Source being adversely treated by Lofty and/or its members/volunteers. Holding a grudge (or holding one on behalf of someone else) is counterproductive.

If one *must* hold a grudge as a result of a conflict that has ostensibly been resolved using the correct channels, kindly leave said grudge at home instead of bringing it into Lofty.

### Resources

The Community Media Training Organisation (CMTO) has prepared a useful guide to assist members/volunteers in managing conflict.

# Policy and Procedures- Conflict

## Conflict Resolution

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We all know conflict exists because we've all either experienced it or seen it happening. Conflict is an inseparable part of human existence. Community radio is required to follow a Code of Practice dedicated to managing conflicts within station. The Community Radio Code of Practice number 6 requires all stations to have a code of practice for internal dispute resolution.

The CBAA Handbook at [www.cbbaa.org.au](http://www.cbbaa.org.au) is a good place to go for some information and ideas. A station needs a policy and procedure on conflict resolution for it to meet the terms of the Code. A visit to the Australian Communications and Media Authority website [www.acma.gov.au](http://www.acma.gov.au) publishes the results of investigations they have undertaken in recent years in relation to breaches of Code 6.

When conflict arises, you will need to lead the people involved through the conflict. It is important to deal with conflict promptly to prevent it from getting bigger and uglier. In an attempt to gain a win/win solution from the conflict, you could follow this approach:

### 1. Understanding

Those people involved need to understand what the conflict is about: what is the argument about, where is the anger coming from? You need to map out the conflict. Some people find it useful to draw a mud map – put the conflict in the middle – give it its own space and name it. Linking to the conflict is everyone else's perceptions of the conflict - the needs, fears and feelings about it. Give every individual in your team their own space too – and jot down their take on the situation. Everyone needs to say what they feel, and others need to listen and try on a little empathy.

### 2. Avoid making things worse

Take a firm hand in facilitating the meeting and ensure that people follow some basic rules:

- a. no put downs
- b. no personal remarks, sarcasm or remarks that could hurt feelings
- c. don't bring up the past – let's move forward
- d. no interrupting, shouting or raising your voice
- e. no taking sides
- f. tackle the "ball (the issue) not the man"
- g. use clear communication – everyone should own their own thoughts and feelings

### 3. Work together

All people involved need to agree on the rules and take turns in saying openly and honestly what they think and feel without blaming others. Use "I" statements like: "I feel put down when you..." rather than "you make me feel...". That way the person who speaks owns their own feelings and does not blame others. Talk quietly, gently and with purpose. It can be easier to control your emotions when you control your voice. Use active listening and reflective listening techniques.

Indicate to the other person that you are listening (without interrupting) via body language. Repeat what you have heard to clarify, for example, “So you feel that...?”

#### **4. Find the solution**

Brainstorm a wide range of options that could resolve the conflict. Be creative, don't censor and get everything written down. Look for solutions that provide mutual gain - the win/win solution. Check that everyone can commit to that solution, identify what everyone is to do, stick to what you have decided and check in again on progress.

It is worth noting that sometimes the conflict can't be resolved. Despite having worked through all the conflict resolution techniques, there may be irreconcilable differences that just can't be worked out. In these instances, you may need to make the call and suggest that the team disband or a solution is found that does not include the people in conflict working together. It's tough, but sometimes people just can't get on.

There is lots of information available on conflict resolution, so check it out. It does take skill and some experience to manage it well, so work on those skills you need to manage conflict in non-conflict situations like your team or staff meetings and in performance appraisals. It helps hone the skills for when you need them and means you are communicating effectively in all aspects of your management role.

However, not all conflicts are easy to resolve, particularly when dealing with the serious issues of harassment, bullying and violence.



## POLICY DOCUMENT 3.4.2

**Policy Name (full)** Participation – Internal Conflict Resolution > Resolution Level 2

**Policy Family** 3 - Participation

**Version/Date** V1.0 21 July 2019

**Maintained By** Board

### PRECIS

As described in Policy 3.4.0 (Internal Conflict Resolution), this policy describes Level 2 of Lofty's three-level internal conflict resolution process. [refer Code 1.5]

### Background

Policy 3.4.0 provides a primer on how conflict arises, defines the parties involved in an internal dispute and outlines Lofty's three-level internal conflict resolution process.

This policy describes Level 2 – Semi-Formal Resolution.

### Definitions

<i>Aggrieved</i>	The party feeling distressed, offended, upset or otherwise wronged by the <i>Source</i> .
<i>Source</i>	The party with whom the <i>Aggrieved</i> has a dispute.
<i>Lofty</i>	One or more representatives made up of Lofty Board Members and/or Management assigned to facilitate a resolution between the <i>Aggrieved</i> and the <i>Source</i> .

Resolution Level	Characteristics
<b>Level 2 Semi-formal</b>	<ul style="list-style-type: none"><li>- This level is managed by Lofty, either with or without engaging an external support party.</li><li>- May be the result of continued tension between the Aggrieved and the Source based on either a previously addressed catalyst and/or a new catalyst.</li><li>- Requires a written description of the complaint from the Aggrieved.</li><li>- Mediation may be requested by either the Aggrieved or the Source.</li><li>- The Aggrieved may choose to either remain anonymous or disclose their identity to the Source.</li><li>- Resolution (where applicable) to be documented in writing.</li></ul>

### Level 2 Resolution – Semi-formal

As the name suggests, Level 2 Resolution is engaged should the Level 1 Resolution process be unsuccessful. Access to mediation is a key difference between Level 1 and Level 2.

The Level 2 process is relatively tight, as it is designed to give all disputing parties a second and final chance to resolve their dispute prior to formal escalation. *Only one opportunity to voluntarily seek mediation is provided*, as formal mediation is a mandatory step in Level 3 Resolution.

The Source shall have at least one chance to propose a direct solution outside of mediation, with a second chance to offer a solution should the Aggrieved chose not to enter into informal mediation.

This is designed to encourage all parties to take ownership in resolving their dispute.



## Level 2 Resolution – Summary (visual)

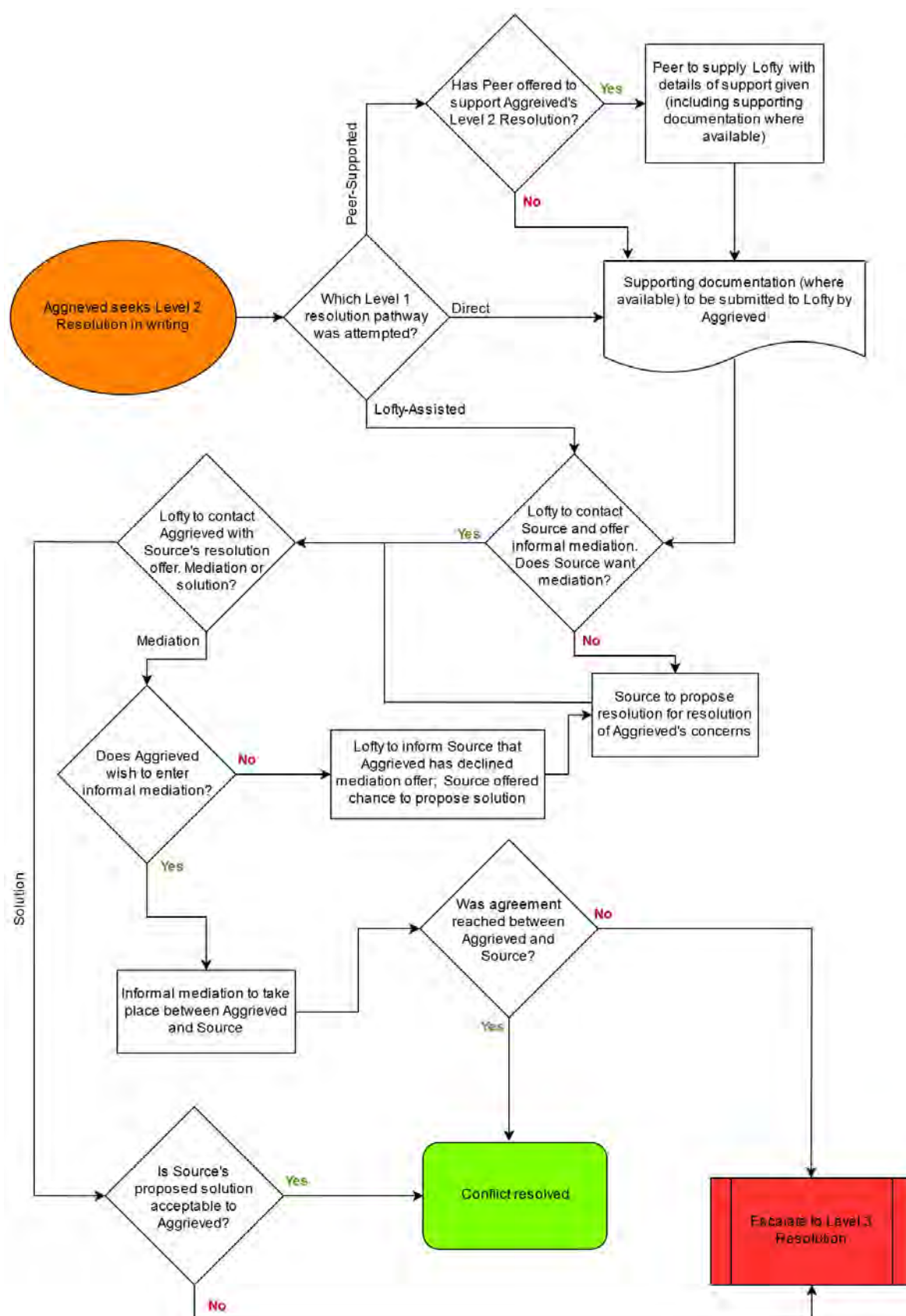


Figure 3.4.2(a) Flow diagram of Level 2 Resolution process.

## Level 2 Resolution – Summary (written)

Step	Description						
1	<p>The Aggrieved engages Lofty (as defined in this policy) to continue with the conflict resolution process. This continuation request is to be put in writing.</p> <ul style="list-style-type: none"><li>Where Level 1 Conflict Resolution was attempted via the Direct resolution pathway, please supply as much supporting information as possible e.g. diary notes, emails, text messages etc.</li><li>Where Level 1 Conflict Resolution was attempted via the Peer-Assisted resolution pathway, please supply supporting information (as per Direct resolution pathway) and confirm whether or not your peer assistant is in a position to discuss their role in the Level 1 Conflict Resolution attempt with Lofty.</li><li>Where Level 1 Conflict Resolution was attempted via the Lofty-Assisted resolution path, a simple email asking for continuation to Level 2 Semi-Formal Resolution is sufficient.</li></ul>						
2	<p>Lofty shall contact the Source to inform them that the Aggrieved's concerns are still outstanding. Source to be offered an opportunity to either present a solution to the Aggrieved, or to enter into informal mediation <i>subject to agreement between all conflicting parties</i>. Is mediation sought by the Source?</p> <table><tr><td>Yes</td><td>No</td></tr><tr><td>Continue to Step 3</td><td>Proceed to Step 5</td></tr></table>	Yes	No	Continue to Step 3	Proceed to Step 5		
Yes	No						
Continue to Step 3	Proceed to Step 5						
3	<p>Lofty shall contact the Aggrieved with the Source's offer of either (a) entering mediation or (b) direct solution to address the conflict. Does the Aggrieved wish to enter mediation?</p> <table><tr><td>Yes</td><td>No</td></tr><tr><td>Proceed to Step 6</td><td>Continue to Step 4</td></tr></table>	Yes	No	Proceed to Step 6	Continue to Step 4		
Yes	No						
Proceed to Step 6	Continue to Step 4						
4	<p>Lofty shall inform Source that Aggrieved has declined the opportunity to enter informal mediation. Source offered second opportunity to propose solution.</p>						
5	<p>Lofty shall contact the Aggrieved with the Source's solution to address the conflict. Does the Aggrieved accept the Source's proposed solution?</p> <table><tr><td>Yes</td><td>No</td></tr><tr><td><b>Conflict resolved, to be confirmed to all parties via email</b></td><td><b>Proceed to Level 3 Resolution process</b></td></tr></table>	Yes	No	<b>Conflict resolved, to be confirmed to all parties via email</b>	<b>Proceed to Level 3 Resolution process</b>		
Yes	No						
<b>Conflict resolved, to be confirmed to all parties via email</b>	<b>Proceed to Level 3 Resolution process</b>						
6	<p>Lofty shall arrange informal mediation between the conflicting parties. The mediator shall be an independent third party that is (a) not a member of Lofty and (b) as appointed by the South Australian Community Broadcasting Association (SACBA).</p>						
7	<p>Upon completion of mediation, the mediator shall communicate the outcome to Lofty viz.</p> <table><tr><td>satisfaction (both parties)</td><td>or</td><td>dissatisfaction (one or both parties)</td></tr><tr><td><b>Conflict resolved</b></td><td></td><td><b>Proceed to Level 3 Resolution process</b></td></tr></table>	satisfaction (both parties)	or	dissatisfaction (one or both parties)	<b>Conflict resolved</b>		<b>Proceed to Level 3 Resolution process</b>
satisfaction (both parties)	or	dissatisfaction (one or both parties)					
<b>Conflict resolved</b>		<b>Proceed to Level 3 Resolution process</b>					

## **Potential solutions**

There is no hard and fast rule as to what a potential solution as tendered by the Source may look like.

Some solutions may include an apology (written or verbal), an offer of compromise and/or an undertaking to refrain from engaging in behaviour to which the Aggrieved has taken exception.

Offering no solution is also a form of solution, however this is likely to result in escalation to Level 3 Resolution.

## **Mediation**

Whilst formal mediation is a mandatory step during Level 3 Resolution, the mediation offered at Level 2 is considered to be informal due to its voluntary nature.

Whilst not mandatory at Level 2, Lofty highly recommends mediation in cases where all parties genuinely seek resolution.

An independent external mediator with significant experience in resolving disputes in a community radio environment is to be engaged viz. a mediator appointed by SACBA.

*Why does the Source get to choose whether or not to mediate?*

Because maths. Mediation can't happen unless 100% of the conflicting parties agree to it, and the process flow of Level 2 Resolution provides a natural opportunity to allow the Source to make it known that they have a genuine desire to resolve the dispute.

Should the Source choose to enter informal mediation, it will be up to the Aggrieved to make up the numbers. If the Source declines the opportunity to enter informal mediation, the quorum is impossible to meet.

Neither Lofty's Board nor Management shall act as ersatz mediators; ain't nobody got time for that. There is also the risk that – despite the best endeavours of Lofty's Board and Management to act in good faith during mediation, there is a perception that allowing a non-independent party to mediate could impede natural justice, thus risking a breach of Rule 54 of the Lofty Constitution.

## **Other rights and obligations**

Lofty shall treat the conflict resolution process in the strictest of confidence.

The Aggrieved and/or the Source shall refrain from discussing their dispute with any other member/volunteer.

Should resolution be achieved in mediation, or as otherwise agreed in writing between the Aggrieved and the Source, Lofty shall deem the dispute resolved.

Participation in the Conflict resolution process shall not cause the Aggrieved or the Source to be discriminated against, vilified and/or ostracised, either by Lofty or its members/volunteers.



## POLICY DOCUMENT 3.4.3

Policy Name (full)	Participation – Internal Conflict Resolution > Resolution Level 3
Policy Family	3 - Participation
Version/Date	V1.0 21 July 2019
Maintained By	Board

### PRECIS

As described in Policy 3.4.0 (Internal Conflict Resolution), this policy describes Level 3 of Lofty's three-level internal conflict resolution process. [refer Code 1.5]

### Background

Policy 3.4.0 provides a primer on how conflict arises, defines the parties involved in an internal dispute and outlines Lofty's three-level internal conflict resolution process.

This policy describes Level 3 – Formal Resolution.

### Definitions

<i>Aggrieved</i>	The party feeling distressed, offended, upset or otherwise wronged by the <i>Source</i> .
<i>Source</i>	The party with whom the <i>Aggrieved</i> has a dispute.
<i>Lofty</i>	One or more representatives made up of Lofty Board Members and/or Management assigned to facilitate a resolution between the <i>Aggrieved</i> and the <i>Source</i> .

<b>Level 3 Formal</b>	<ul style="list-style-type: none"><li>- To be invoked either if Level 1 and 2 Resolution fails, or if the Board orders an escalation (<i>Escalation/Bypass</i> as defined in Policy 3.4.0).</li><li>- At least one external support party shall be engaged during Level 3.</li><li>- Anonymity of the Aggrieved is to be carefully considered on a case by case basis.</li><li>- Where Level 3 is invoked as the result of a serious allegation, policies and procedures surrounding the management and investigation into set allegation are to be followed in conjunction with this policy.</li><li>- <b>Failure to resolve at Level 3 will result in the conflict being upgrade to Internal Complaint status</b></li><li>- May result in formal disciplinary action against the Source and/or other Lofty members – including the Aggrieved - in the event that Level 3 is invoked due to a long-running dispute and/or the Aggrieved has been found <i>beyond reasonable doubt</i> to be acting in a vexatious and/or unreasonable manner.</li><li>- A Level 3 Resolution may also result in subsequent investigations being undertaken by the Board.</li></ul>
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### Mediation

Lofty shall offer an *independent* mediator to facilitate a resolution between the Aggrieved and the Source; the independence of said mediator confirmed by (a) said mediator not being a member of Lofty and (b) said mediator being appointed by the South Australian Community Broadcasting Association (SACBA).



Should the mediation process fail to yield a resolution, the conflict resolution process will be terminated without a result.

### **Unresolved conflicts**

In the event that the conflict resolution process is terminated in the above manner, the internal conflict shall be upgraded to an internal complaint. Said internal complaint shall be investigated pursuant to Rules 47 through 52 of the Lofty Constitution.

### **Board powers in relation to Level 3 Formal Resolution**

In addition to *escalation/bypass* powers and the power to upgrade an internal conflict to an internal complaint without further reference to the Aggrieved (as described in Policy 3.4.0), the Board also has the power to impose sanctions on one or all parties involved in the resolution process where:

- there is a long-running dispute between the Aggrieved and the Source, irrespective of whether the conflict relates to one ongoing complaint of a number of shorter/smaller complaints; or
- after careful consideration and investigation, the Board is of the opinion *beyond reasonable doubt* that the Aggrieved is acting in a vexatious and/or unreasonable manner.

Said sanctions, as well as the right of appeal to same, shall be set in terms of Rules 49 through 52.

### **Other rights and obligations**

Lofty shall treat the conflict resolution process in the strictest of confidence.

The Aggrieved and/or the Source shall refrain from discussing their dispute with any other member/volunteer.

Should resolution be achieved in mediation, Lofty shall consider the dispute resolved.

Participation in the Conflict resolution process shall not cause the Aggrieved or the Source to be discriminated against, vilified and/or ostracised, either by Lofty or its members/volunteers.



## POLICY DOCUMENT 3.3.1

<b>Policy Name (full)</b>	Participation > Rights and Obligations > Anti-discrimination
<b>Policy Family</b>	3 - Participation
<b>Version/Date</b>	V1.0 21 July 2019
<b>Maintained By</b>	Board

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### PRECIS

Maintaining a safe space for its participants is something Lofty takes very seriously, with this policy setting the rights of all Lofty participants to enjoy an environment that is free of discrimination. and of a series relating to participant rights and obligations.

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### Introduction

Lofty's modern and progressive DNA has embedded a strong culture of celebrating diversity and the establishment of a safe creative space, borne from the individual and collective ethos of its founders.

Our Anti-discrimination policy, along with all other policies in the Participation > Rights and Obligations policy family, represents a portion of Lofty's DNA translated into writing.

This policy also sets basic parameters around affirmative action, as well as recourse in the unlikely event that a Lofty participant strays outside our cultural norms insofar as discrimination is concerned.

### Scope

All persons participating in Lofty's activities, including but not limited to members, volunteers and/or external third parties working with Lofty.

### Policy

Lofty categorically rejects discrimination *against* any individual on the basis of said individual's personal attributes, including but not limited to:

- race and/or ethnic background
- religion
- age
- place of birth
- language
- gender identification
- sexual orientation
- political ideology
- disability (mental or physical disability)
- neurodiversity
- socioeconomic status
- any and all other personal attributes protected by law

Lofty shall make all reasonable accommodations to allow people who experience difficulties in their dealings.

## **Affirmative action**

In order to address individual or social inequity within our community, Lofty may develop and execute affirmative action initiatives in order to meet a community need, or where otherwise required by law.

Lofty's affirmative action initiatives shall place emphasis on creating parity between all participants, irrespective of condition or status that is a source of natural disparity.

The goal is to create an environment where a group within our community identified as being negatively impacted by inequity can enter a space where they can enjoy being an equal with all other participants.

We assist in the closure of this equity gap by providing support to create parity between all Lofty participants. The creation of said parity shall not be to the detriment of any other Lofty participant(s).

## **Responsibilities**

### ***Board***

The Board shall:

1. Regularly review the leadership and commitment given to eliminating discrimination through active promotion of Lofty's Anti-Discrimination Policy.
2. Monitor performance by way of periodic management reports and assurances.
3. Ensure that:
  - a. Lofty's practices and processes incorporate precautions against discrimination in such areas as hiring, client selection, and program delivery;
  - b. Reasonable accommodations are made to allow diverse groups to access benefits provided by Lofty;
  - c. Where appropriate, weight is given to the culture and experiences of individuals from disadvantaged groups.
  - d. Where appropriate, delegate responsibility for compliance to officers with responsibility for particular sections.
  - e. Oversee the performance of subordinate officers in these matters.
  - f. Review and report to the Board, as appropriate, on the effectiveness of the management systems established to remove discrimination.
  - g. Analyse material breaches and identified compliance system weaknesses for systematic trends and ensure that any adverse trends are addressed.
  - h. Promote a culture of effective policy compliance across Lofty.

### ***Subcommittees***

As leaders within the Lofty cohort, Subcommittee members and Coordinators shall promote a culture of effective policy compliance across Lofty.

### ***All participants***

All participants shall:

1. Proactively build and maintain parity between all Lofty participants by taking into account each participant's differences.

2. Consider the value that each participant brings to Lofty as an active and engaged participant.
3. Ensure that they are aware of Lofty's policies against discrimination.
4. Not act in a manner that would be considered to be discriminatory pursuant to this policy or any applicable legislation.
5. Where appropriate, suggest ways in which practices, systems and procedures could be improved so as to reduce the likelihood of discrimination occurring.

## **Recourse**

Where a Lofty participant believes that have been discriminated against based on a personal attribute, said participant may seek resolution via Lofty's internal conflict resolution process, as documented in Policy Family 3.4 Participation > Conflict Resolution.

Should a Lofty member feel that parity between participants is not being met, please address this with the Board. Note that a Lofty member may express these concerns either on their own behalf, on behalf of someone else, or as a general observation across a specific function or Lofty as a whole.



## POLICY DOCUMENT 3.3.2

<b>Policy Name (full)</b>	Participation > Rights and Obligations > Sexual Harassment
<b>Policy Family</b>	3 - Participation
<b>Version/Date</b>	V1.0 21 July 2019
<b>Maintained By</b>	Board

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### PRECIS

Maintaining a safe space for its participants is something Lofty takes very seriously, with this policy setting the rights of all Lofty participants to enjoy an environment that is free of discrimination. and of a series relating to participant rights and obligations.

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### Introduction

Lofty's modern and progressive DNA has embedded a strong culture of celebrating diversity and the establishment of a safe creative space, borne from the individual and collective ethos of its founders.

Our sexual harassment policy, along with all other policies in the Participation > Rights and Obligations policy family, represents a portion of Lofty's DNA translated into writing.

Lofty remains vigilant in maintaining an organisation that is free of sexual harassment.

### Scope

All persons participating in Lofty's activities, including but not limited to members, volunteers, external consultants, visitors, guests, clients, community representatives or anyone else that comes into direct physical contact with Lofty is subject to this policy

As well as conduct occurring on Lofty property, this policy applies to conduct that takes place in any Lofty-related context, including but not limited to conferences, work functions, social events, fundraising events and/or community events.

Lofty may also be subject to vicarious liability should said harassment occur between parties to whom each other was introduced via participation in Lofty. This includes harassment occurring in locations and/or contexts that would otherwise be outside of Lofty's scope, such as stalking or sexting.

### 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<sup>1</sup>, friendship and respect is not sexual harassment.

## Policy

***Every Lofty participant – irrespective of their position, status, age or gender - is responsible for upholding Lofty's zero-tolerance stance on sexual harassment.***

Lofty will vigorously defend the right of every participant to perform their duties without being subjected to sexual harassment. Every participant is responsible for providing an environment that is supportive of this aim. Everyone must treat everyone else with respect and must aim to act as a beacon for good behaviour at Lofty.

### *Legal requirements*

Both federal and state Equal Employment Opportunity (EEO) legislation provide that sexual harassment is unlawful and establish minimum standards of behaviour within the workplace. Whilst Lofty is a not-for-profit incorporated association operated by 100% volunteer labour, Lofty shall be deemed a workplace for legislative purposes.

Despite Lofty's best endeavours to create a safe creative space for all in the local community, it is impossible to effectively block all potential sources of sexual harassment prior to their participation in Lofty.

Where a police matter is raised as a result of sexual harassment endured whilst participating at Lofty, we will offer full support to the victim during the legal process.

## Reporting harassment

We strongly encourage all participants to report any instances of sexual harassment suspected, observed and/or experienced.

Please refer to Lofty's internal conflict resolution process as documented in Policy Family 3.4.

Sexual harassment allegations are of a highly sensitive and personal nature, and individual perceptions of how severe an act of sexual harassment is may differ from person to person.

Should the reporting party have any doubt as to the severity of said harassment, they are to request an *escalation* to Conflict Resolution Level 3 as defined in Policy 3.4.0.

Should the harassed feel uncomfortable or concerned about making their report internally, they may instead report their concerns/allegations to the South Australian Community Broadcasting Association (SACBA) at [info@sacba.org.au](mailto:info@sacba.org.au).

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<sup>1</sup> Whilst it's not unheard of for people to become mutually attracted to one another as the result of participation in a shared interest, Lofty strictly subscribes to the concept that **no means no**. We strongly encourage the recipient of said "no" to take it as their first and final answer. In the event that the issuer of said "no" changes their mind at some point in the future, it is up to the issuer to clearly communicate this change to the receiver. However, the receiver may have also changed their mind as a result of taking the initial "no" as *the* first and final answer.



### POLICY DOCUMENT 3.3.3

**Policy Name (full)** Participation > Rights and Obligations > Bullying  
**Policy Family** 3 - Participation  
**Version/Date** V1.0 21 July 2019  
**Maintained By** Board

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#### PRECIS

Maintaining a safe space for its participants is something Lofty takes very seriously, with this policy setting the rights of all Lofty participants to enjoy an environment that is free of discrimination. and of a series relating to participant rights and obligations.

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#### Introduction

Lofty's modern and progressive DNA has embedded a strong culture of celebrating diversity and the establishment of a safe creative space, borne from the individual and collective ethos of its founders.

Our bullying policy, along with all other policies in the Participation > Rights and Obligations policy family, represents a portion of Lofty's DNA translated into writing.

Lofty remains vigilant in maintaining an organisation that is free of bullying.

#### Scope

All persons participating in Lofty's activities, including but not limited to members, volunteers, external consultants, visitors, guests, clients, community representatives or anyone else that comes into direct physical contact with Lofty is subject to this policy.

As well as conduct occurring on Lofty property, this policy applies to conduct that takes place in any Lofty-related context, including but not limited to conferences, functions, social events, fundraising events and/or community events.

#### Definitions

**"Bullying"** is repeated and unreasonable behaviour directed towards a person or group of persons that creates a risk to health and safety. It includes behaviour that could be expected to intimidate, offend, degrade, humiliate, undermine or threaten.

**"Repeated behaviour"** refers to the persistent nature of the behaviour and can involve a range of behaviours over time.

**"Unreasonable behaviour"** is behaviour that a reasonable person, having considered the circumstances would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

Whilst all Lofty participants carry out their duties on a voluntary basis, Lofty is deemed to be a *workplace* for the purposes of this policy. Descriptions such as *"employee"* and *"manager"* are used to illustrate power dynamics/imbances that may come into play when bullying-related issues are considered, rather than literal names for roles within Lofty.

Examples of behaviour, whether intentional or unintentional, that may be considered to be workplace bullying if they are repeated, unreasonable and create a risk to health and safety include but are not limited to:

- abusive, insulting or offensive language or comments
- unjustified criticism or complaints
- deliberately excluding someone from workplace activities
- withholding information that is vital for effective work performance
- setting unreasonable timelines or constantly changing deadlines
- setting tasks that are unreasonably below or beyond a person's skill level
- denying access to information, supervision, consultation or resources to the detriment of the worker
- spreading misinformation or malicious rumours
- changing work arrangements such as rosters and leave to deliberately inconvenience a particular workers or workers.

Workplace bullying can be carried out in a variety of ways including through email, text or social media channels.

Workplace bullying can occur between workers (sideways), from managers to workers (downwards), or workers to supervisors/managers (upwards).

Reasonable management action is not considered to be workplace bullying if it is carried out lawfully and in a reasonable manner in the circumstances. Examples of reasonable management action include but are not limited to:

- setting reasonable performance goals, standards and deadlines
- deciding not to select a worker for promotion where a reasonable process is followed
- informing a worker about unsatisfactory work performance in an honest, fair and constructive way
- taking disciplinary action, including suspension or terminating employment.

Differences of opinion and disagreements are generally not considered to be workplace bullying.

Bullying that directly inflicts physical pain, harm, or humiliation amounts to assault and should be dealt with as a police matter. Lofty shall fully support victims during the legal process.

## **Policy**

***Every Lofty participant – irrespective of their position, status, age or gender - is responsible for upholding Lofty's zero-tolerance stance on bullying.***

Lofty has a duty of care to provide a safe workplace, and ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks.

Lofty accepts and acts on its duty of care. any reported allegations of workplace bullying will be promptly, thoroughly, and fairly investigated.

Bullying complaints will be handled in a confidential and procedurally fair manner. Where confidentiality cannot be guaranteed this will be clearly communicated to the relevant parties.



## **Reporting bullying**

We strongly encourage all participants to report any instances of bullying suspected, observed and/or experienced.

Please refer to Lofty's internal conflict resolution process as documented in Policy Family 3.4.

Bullying allegations are of a highly sensitive and personal nature, and individual perceptions of how severe an act of bullying is may differ from person to person.

Should the reporting party have any doubt as to the severity of said bullying, they are to request an *escalation* to Conflict Resolution Level 3 as defined in Policy 3.4.0.

Should the bullied feel uncomfortable or concerned about making their report internally, they may instead report their concerns/allegations to the South Australian Community Broadcasting Association (SACBA) at [info@sacba.org.au](mailto:info@sacba.org.au).

## **Appendix 17.4**

### **Complaints Handling**

Lofty Policy Family 6



## **POLICY DOCUMENT 6.0.1**

**Policy Name (full)** Complaints Handling > Introduction  
**Policy Family** 6 – Complaints Handling  
**Version/Date** V1.0 1 December 2018  
**Maintained By** Board

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**PRECIS** An introduction to the framework of Lofty’s complaints handling process.

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### **Introduction**

As per the Community Radio Codes of Practice 2008 (the “Code”), Lofty is obliged to have a complaints handling policy in place, written in terms of Code 7. Whilst Code 7 sets a sound framework for complaints or concerns relating to alleged transgressions of the Code and/or the Broadcasting Services Act (Cth) 1992 (the “Act”), it does not cover all of Lofty’s activities.

The Complaints Handling policy document series takes Code 7 – which also forms the basis for Rule 53 of the Lofty Constitution – into account. However, this policy also encompasses factors such as social media, face-to-face interaction between Lofty and the community, use of technology to capture and provide appropriate response to complaints, and so on.

### **Rationale**

Whilst the Code provides a simple and robust framework for complaints relating to broadcasting, it does not provide a framework for complaints that fall outside of this scope.

Given that Lofty is a community media organisation made up of many moving parts, it is vital that we have a complaints handling framework that provides coverage across our entire organisation.

Our policies and procedures shall be designed to enable accurate and efficient capture of genuine complaints and concerns, along with reliable filtering of complaints that a reasonable person may deem to be of a frivolous or vexatious nature.

Above all, Lofty’s complaints handling policies and procedures shall protect the rights of both the audience and Lofty.



## POLICY DOCUMENT 6.0.2

**Policy Name (full)** Complaints Handling > Definitions  
**Policy Family** 6 – Complaints Handling  
**Version/Date** V1.0 1 December 2018  
**Maintained By** Board

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### PRECIS

This policy defines the various types of complaints Lofty may receive, and defines how Lofty's complaints handling policies either meet or exceed those mandated by regulators.

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### Introduction

Lofty takes its role as a community media outlet seriously. As well as providing an FM community broadcasting service, Lofty also operates a web site and social media feeds, as well as participating directly in community events which may or may not be subject to broadcast.

As such, the minimum standards required for a community broadcaster (viz. Code 7 of the Community Radio Broadcasting Codes of Practice 2008, the "Codes") may not adequately confer the rights of the community to provide feedback to Lofty; nor may the Codes adequately reserve Lofty's rights in dealing with complaints that are frivolous, vexatious or otherwise not made in good faith.

This policy serves as an adjunct to Code 7, as well as Rule 53 of Lofty Constitution.

### Rationale

Whilst the Code provides a simple and robust framework for complaints relating to broadcasting, it does not provide a framework for complaints that fall outside of this scope.

Said complaints may arise from concerns about Lofty's perceived conduct on social media, at public events or in any other context that does not constitute a broadcast as defined in the Broadcasting Services Act (Cth) 1992 (the "Act").

As Lofty takes pride in being an active participant in the community on many levels, we believe that it is important we remain open to feedback on all of our activities.

### Complaint Classification

Where a real name and at least two of three following contact points are given (being postal address, email address and/or contact telephone number), this shall be treated as a formal complaint. Formal complaints are to be dealt with in terms of Policy 6.0.3.

Any complaint received that falls outside the above parameters is considered to be an Informal Complaint, and treated as such. Informal complaints are to be dealt with in terms of Policy 6.0.4.

All complaints, irrespective of whether deemed formal or informal, are to be logged by Lofty. Records of said complaints are to be retained for a minimum of seven (7) years.

All complaints shall be screened in an attempt to confirm that said complaint is made in good faith, and is not frivolous, vexatious or otherwise spurious. Our screening process, along with how said complaints are handled, is detailed in Policy 6.0.5.

## Comparison of Lofty's Complaint Policy vs minimum mandated standards

Issue	Minimum Standard	Lofty Policy
Alleged non-compliance with both the licence conditions in the Act and the requirements outlined in the Codes. (Code 7.1)	Listeners, members and volunteers are entitled to make complaints in writing. (Code 7.1)	Lofty offers the following mechanisms to accept complaints: <ul style="list-style-type: none"> <li>- In writing via email</li> <li>- In writing via post</li> <li>- Verbally via telephone</li> <li>- Online feedback form on the Lofty website</li> </ul>
Resolution of complaints that are made with sufficient grounds or are made in good faith. (Code 7.2)	We will make every reasonable effort to resolve complaints, except where a complaint is clearly frivolous, without sufficient grounds or not made in good faith. (Code 7.2)	<p>We will make every reasonable effort to resolve complaints, except where a complaint is clearly frivolous, without sufficient grounds or not made in good faith.</p> <p>Lofty reserves the right to undertake screening of complaints and/or complainants where we have reason to believe that said complaint is vexatious.</p> <p>Should a complaint and/or a complainant be deemed to be vexatious pursuant to Policy 6.0.5, this complaint shall be recorded in terms of Lofty's complaints recording procedures, along with file notes detailing the rationale behind said ruling. Said records may be forwarded to the regulator at any time without further reference to the complainant.</p>
Response mechanism to complaints. (Code 7.3)	We will ensure that complaints will be received by a responsible person in normal office hours and receipt is acknowledged in writing. (Code 7.3.a)	<p>Lofty offers 24/7 access for complainants to leave feedback via email, online web form and phone (voicemail).</p> <p>Where Lofty has been provided with adequate contact details to provide a receipt in writing, we shall do so as soon as practicable.</p>
Response mechanism to complaints. (Code 7.3)	We will ensure that complaints will be conscientiously considered, investigated if necessary, and responded to substantively as soon as possible. (Code 7.3.b)	<p>All complaints shall be conscientiously considered.</p> <p>Classification of the complaint shall occur in terms of our Complaints Policy Framework, Policy 6.</p> <p>Lofty reserves the right to prioritise its complaint handling resources</p>

		<p>based on the classification and nature of the complaint.</p> <p>Any complaint that has not been deemed as vexatious shall be investigated and responded to substantively as soon as possible.</p>
Response mechanism to complaints. (Code 7.3)	<p>We will ensure that complaints will be responded to in writing within sixty (60) days of receipt, as required by the Act, and the response will include a copy of the Codes. (Code 7.3.c)</p> <p>A written complaint or response can be a letter, fax, or email. (Code 7.3.d)</p>	<p>We will ensure that any complaint that falls under the category of a Formal Complaint in terms of Policy 6 shall receive a comprehensive response within sixty (60) days of said complaint being received.</p> <p>Said response shall be delivered via post or email, at Lofty's discretion.</p> <p>Where a complaint relates directly to the Codes, a copy of the Codes shall be provided to the complainant as part of our response.</p> <p>All complainants shall receive either a soft or hard copy of Policy 6.</p>
Response mechanism to complaints. (Code 7.3)	<p>We will ensure that complainants are advised in writing that they have the right to refer their complaint about a Code matter to ACMA provided they have first:</p> <ol style="list-style-type: none"> <li>1. formally lodged their complaint with the licensee in writing, and</li> <li>2. received a substantive response from the licensee and are dissatisfied with this response, or have not received a response from the licensee within sixty (60) days after making the</li> </ol>	<p>Where a formal complaint relates to either an alleged breach of the Code or the Act, Lofty shall state in their response to said complaint that the complainant has the right to escalate their complaint to ACMA should the complainant feel Lofty's response is unsatisfactory or not substantive.</p> <p>Where a formal complaint is not within the scope of the Code or the Act, Lofty will endeavour to provide the most appropriate escalation point should the complainant feel the response to their complaint is unsatisfactory or not substantive.</p>

	complaint. (Code 7.3.d)	
Record keeping of complaints (Code 7.4)	A responsible person of the licensee will maintain a record of complaints and responses for at least two (2) years from the date of the complaint. (Code 7.4)	<p>Lofty shall retain records of all complaints recorded, irrespective of classification (viz. formal, informal or vexatious) for at least seven (7) years from the date of the complaint.</p> <p>For the purposes of the Code, the Secretary of the Association shall be deemed as the responsible person.</p>
Provision of records to the regulator (Code 7.5)	The record of complaints and responses will be made available to ACMA on request. (Code 7.5)	<p>Upon ACMA's request, Lofty shall provide details of any or all recorded complaints ACMA requests.</p> <p>Said request shall be honoured irrespective of whether or not said complaint relates to an alleged breach of the Codes and/or the Act.</p>
Complaints relating to social media activities undertaken by Lofty and/or its members and volunteers.	As at the time of writing, there appears to be no enforceable Code or Act pertaining to social media conduct.	<p>There is no single act that may apply to social media.</p> <p>Portions of other Acts and Codes, such as the Spam Act 2003, Code 6 of the Community Radio Broadcasting Codes of Practice, or various State and Commonwealth Acts (such as Defamation Acts) have the potential to intersect with allegations of Lofty misusing social media.</p> <p>Despite the lack of unified social media Act or Code, Lofty takes its responsibility as a good social media citizen seriously, and will conscientiously consider any <i>genuine</i> complaint relating to Lofty's social media presence or conduct.</p> <p>In this instance, the onus is on the complainant to provide substantive proof of Lofty's alleged misconduct.</p>

		Should said complainant not provide said proof within seven (7) days of their complaint being acknowledged, Lofty shall record the complaint and complainant as vexatious.
Complaints delivered via social media	A written complaint or response can be a letter, fax, or email. (Code 7.3.d)	<p>Where a complaint is made to Lofty via social media, either publicly or privately, the complainant shall be contacted via private message and invited to lodge their complaint via official channels.</p> <p>Where the complainant has a genuine complaint but chooses not to make a formal lodgement, Lofty shall record the complaint and take it to the Board for their consideration as an informal complaint at the next Board meeting.</p> <p>Where a public complaint is made on Lofty's social media pages, Lofty reserves the right to delete said complaint where either the complaint or the complainant is deemed to be vexatious in terms of Policy 6.0.5.</p> <p>Furthermore, where a complainant is deemed to be vexatious, Lofty reserves the right to ban said complainant from Lofty's social media pages with no further recourse.</p>





## POLICY DOCUMENT 6.0.3

**Policy Name (full)** Complaints Handling > Formal Complaints  
**Policy Family** 6 – Complaints Handling  
**Version/Date** V1.0 1 December 2018  
**Maintained By** Board

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**PRECIS** A summary of the three types of complaints, with particular reference as to how Lofty treats formal complaints.

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### Introduction

As per the Community Radio Codes of Practice 2008 (the “Code”), Lofty is obliged to have a complaints handling policy in place, written in terms of Code 7. Whilst Code 7 sets a sound framework for complaints or concerns relating to alleged transgressions of the Code and/or the Broadcasting Services Act (Cth) 1992 (the “Act”), it does not cover all of Lofty’s activities.

The Complaints Handling policy document series takes Code 7 – which also forms the basis for Rule 53 of the Lofty Constitution – into account. However, this policy also encompasses factors such as social media, face-to-face interaction between Lofty and the community, use of technology to capture and provide appropriate response to complaints, and so on.

### Rationale

Complaints come in all shapes and sizes. As we are a volunteer-run organisation with limited resources, Lofty needs to prioritise its complaints handling response based on a number of factors, including but not limited to severity and legitimacy.

As outlined in Policy 6.0.2, complaints can be categorised into three broad types. This policy relates to the handling of formal complaints.

Type of complaint	Typical characteristics	Complaint handling style
Formal complaint	<ul style="list-style-type: none"><li>- Lodged via official channels, often in writing</li><li>- Real name and full contact details provided</li><li>- Complaint is specific in nature, and may detail times and dates when the alleged transgression had taken place</li><li>- Substantive proof is available to verify the complaint’s authenticity</li><li>- Lofty may already be aware of said transgression, and has therefore kept a record prior to receiving said complaint</li></ul>	<ul style="list-style-type: none"><li>- A comprehensive investigation into said complaint shall be undertaken by Lofty</li><li>- A substantive personalised response is to be provided as soon as practicable, but not longer than sixty (60) days after receipt of complaint.</li></ul>

## **Formal complaint**

Formal complaints are the most serious of all. In a formal complaint, a complainant is likely to be either a genuine audience member or someone with an interest in ensuring Lofty maintains a high standard of conduct at all times.

In order to prove their bona fides, the complainant is likely to give their real name and contact details. Given how easy it is for anybody to set up a fake account on social media and make complaints without giving their real identity away, when a complainant does give their real information, it behoves Lofty to treat every formal complaint with respect and gravitas.

## **Formal complaint handling principles**

Policy 6.0.2 contains details of how Lofty's complaints policies act as an adjunct to Code 7.

Complaint handling principles and mechanism for formal complaints is as follows:

1. We will ensure that any complaint that falls under the category of a Formal Complaint in terms of Policy 6 shall receive a comprehensive response within sixty (60) days of said complaint being received.
2. Said response shall be delivered via post or email, at Lofty's discretion.
3. Where a complaint relates directly to the Codes, a copy of the Codes shall be provided to the complainant as part of our response. Additionally, all complainants shall receive either a soft or hard copy of Policy 6.
4. Where a formal complaint relates to either an alleged breach of the Code or the Act, Lofty shall state in their response to said complaint that the complainant has the right to escalate their complaint to ACMA should the complainant feel Lofty's response is unsatisfactory or not substantive.
5. Where a formal complaint is not within the scope of the Code or the Act, Lofty will endeavour to provide the most appropriate escalation point should the complainant feel the response to their complaint is unsatisfactory or not substantive.



## POLICY DOCUMENT 6.0.4

**Policy Name (full)** Complaints Handling > Informal Complaints  
**Policy Family** 6 – Complaints Handling  
**Version/Date** V1.0 1 December 2018  
**Maintained By** Board

### PRECIS

A summary of the three types of complaints, with particular reference as to how Lofty treats informal complaints.

### Introduction

As per the Community Radio Codes of Practice 2008 (the “Code”), Lofty is obliged to have a complaints handling policy in place, written in terms of Code 7. Whilst Code 7 sets a sound framework for complaints or concerns relating to alleged transgressions of the Code and/or the Broadcasting Services Act (Cth) 1992 (the “Act”), it does not cover all of Lofty’s activities.

The Complaints Handling policy document series takes Code 7 – which also forms the basis for Rule 53 of the Lofty Constitution – into account. However, this policy also encompasses factors such as social media, face-to-face interaction between Lofty and the community, use of technology to capture and provide appropriate response to complaints, and so on.

### Rationale

Complaints come in all shapes and sizes. As we are a volunteer-run organisation with limited resources, Lofty needs to prioritise its complaints handling response based on a number of factors, including but not limited to severity and legitimacy.

As outlined in Policy 6.0.2, complaints can be categorised into three broad types. This policy relates to the handling of informal complaints.

Type of complaint	Typical characteristics	Complaint handling style
Informal complaint	<ul style="list-style-type: none"><li>- May be lodged by official or unofficial channels</li><li>- A real name and limited contact details provided</li><li>- Complaint may either be specific or generic in nature</li><li>- May be able to provide broad examples of the alleged transgression(s) taking place</li><li>- Substantive proof may not be held by the complainant</li><li>- Lofty may already be aware of said transgression, and has therefore kept a record</li></ul>	<ul style="list-style-type: none"><li>- A formal personal response may not be required; a simple private message using an unofficial channel may suffice</li><li>- Once the complaint has been established as a genuine information complaint, said complaint shall be raised as an item at the next Board meeting</li><li>- Informal complaints requiring further investigation are to be investigated and resolved as soon as practicable</li></ul>

## **Informal complaint**

Informal complaints tend to be less serious than formal complaints, but still need to be taken seriously and with a conscientious effort to investigate and resolve.

Often, an informal complaint is made by a genuine audience member or someone with an interest in Lofty, and they may have picked up on something that probably shouldn't have happened, or otherwise identified an opportunity for Lofty to improve.

Most of the time, an informal complainant has given their real name. However, they may not wish to go as far as a formal complaint, as they may be unsure as to the severity of said complaint. A complaint of this nature may come via official channels (email, web form, phone) or unofficial channels (social media).

Informal complainants shall be treated with the utmost respect and gravitas, as there is a chance that said complainant may become an advocate for Lofty as long as we take their feedback seriously.

## **Informal complaint handling principles**

Policy 6.0.2 contains details of how Lofty's complaints policies act as an adjunct to Code 7.

Complaint handling principles and mechanism for informal complaints is as follows:

1. We will ensure that any complaint that falls under the category of an Informal Complaint in terms of Policy 6 is acknowledged and discussed within three (3) working days of receipt.
2. Said response is usually delivered using the same media with which it was lodged viz. emailed response to emailed complaint etc.
3. Where a complaint relates directly to the Code or the Act, Lofty shall provide a link to the Codes for the complainant to review and download. A link to Policy 6 shall also be provided.
4. Where an informal complaint relates to either an alleged breach of the Code or the Act, Lofty shall remind the complainant of their right to escalate to a formal complaint.
5. Should Lofty not receive a follow up formal complaint within fourteen (14) days of the informal complaint being acknowledged, Lofty shall finalise its record of the complaint and deem said complaint to be resolved.
6. All informal complaints received since the previous Board meeting are to be conscientiously considered at the next Board meeting, irrespective of whether or not said complaint has been resolved.



## POLICY DOCUMENT 6.0.5

**Policy Name (full)** Complaints Handling > Vexatious Complaints  
**Policy Family** 6 – Complaints Handling  
**Version/Date** V1.0 1 December 2018  
**Maintained By** Board

### PRECIS

A summary of the three types of complaints, with particular reference as to how Lofty treats vexatious complaints.

### Introduction

The Complaints Handling policy document series takes Code 7 – which also forms the basis for Rule 53 of the Lofty Constitution – into account. However, this policy also encompasses factors such as social media, face-to-face interaction between Lofty and the community, use of technology to capture and provide appropriate response to complaints, and so on.

### Rationale

Complaints come in all shapes and sizes. As we are a volunteer-run organisation with limited resources, Lofty needs to prioritise its complaints handling response based on a number of factors, including but not limited to severity and legitimacy. As outlined in Policy 6.0.2, complaints can be categorised into three broad types. This policy relates to the handling of vexatious complaints.

Type of complaint	Typical characteristics	Complaint handling style
Vexatious complaint	<ul style="list-style-type: none"><li>- Usually lodged on social media, but may also be lodged directly to the regulator without reference to complaint handling protocols set out in the Code</li><li>- Can also come in the form of email or telephone</li><li>- May be abusive or abrasive in tone</li><li>- The complaint is usually anonymous</li><li>- Makes claims of transgressions, yet is unable to provide any substantive evidence</li><li>- May make complaints to regulators that have no authority to act on said complaint</li></ul>	<ul style="list-style-type: none"><li>- Log the complaint, including but not limited to taking screenshots of said complaint</li><li>- Attempt to establish the complainants bona fides by undertaking a brief investigation into their social media profile</li><li>- Should the complainants bona fides be verifiable, send a private message to said complainant, inviting them to make a formal complaint via the correct channels</li><li>- Should the complainants bona fides be unverifiable, said complaint is to be deleted and the complainant banned from Lofty's social media pages</li><li>- In extreme cases, where a vexatious complaint has been made with threatening and/or abusive language, Lofty reserves the right to exclude the complainant from joining Lofty in future pursuant to Rule 16 of Constitution V1.1 October 2018 and/or report said complainant to law enforcement agencies where appropriate.</li></ul>

## **Vexatious complaints**

As the name suggests, a vexatious complaint is a complaint that is not made in good faith. It may be frivolous, trifling, based on a fabrication or otherwise spurious.

The rise in social media appears to have emboldened complainants that choose to make complaints that are unsubstantiated, often using multiple fake social media profiles. This may be deemed as a form of trolling.

It is this reason why Lofty does not accept formal complaints via social media; however Lofty does accept informal complaints from bona fide complainants via this channel in terms of Policy 6.0.4. Vexatious complaints may also be delivered via email or phone.

Any complaint made in a threatening, aggressive or otherwise intimidating manner shall be deemed to be a vexatious complaint without any further reference to the complainant.

This policy is designed to strike a balance between ensuring genuine complaints are heard and vexatious complaints being treated in an appropriate manner.

## **Vexatious complaint handling mechanism**

1. All complaints via social media, particularly those posted on public pages or groups, are to be checked carefully in order to attempt to establish the bona fides of said complainant.
2. Where the bona fides of said complainant have been substantiated, Lofty shall contact said complainant via private message in an attempt to talk through their complaint.
3. Should a bona fide complainant wish to continue with the complaints process, Lofty shall work with the complainant to determine whether said complaint is formal or informal.
4. Where the bona fides of said complainant are unable to be substantiated, Lofty reserves the right to delete said complaint and/or ban the complainant from Lofty's social media pages with no further reference to the complainant.
5. All vexatious complaints shall be logged, and reported to the regulator as and when necessary.
6. Where a complainant has used threatening or menacing language, either written or verbally, Lofty reserves the right to file this complaint as a vexatious complaint with no further reference to the complainant. In extreme cases, Lofty reserves the right to report said complaint to the relevant authorities, including but not limited to law enforcement agencies, where the tone and wording of said complaint may be in breach of section 474.15 (Using a carriage service to make a threat), section 474.16 (Using a carriage service for a hoax threat) and/or section 474.17 (Using a carriage service to menace, harass or cause offence) of the Criminal Code Act (Cth) 1995.

## **Appendix 17.5**

### **Community Participation**

Lofty Policies 3.0.1-3.0.2



## POLICY DOCUMENT 3.0.1

<b>Policy Name (full)</b>	Participation > Definitions and Overview
<b>Policy Family</b>	3 – Participation
<b>Version/Date</b>	V1.0 15 July 2018
<b>Maintained By</b>	Board

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### PRECIS

This policy provides an overview Lofty's approach to community participation, as defined in the Community Broadcasting Participation Guidelines 2010.

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### Introduction

The Community Radio Broadcasting Codes of Practice ['the Codes'] define the framework under which community broadcasters shall operate their service.

The phrase concept of *community participation* is weaved throughout the codes. Lofty's understanding is that the Code's *community participation* expectations are aligned with the Community Broadcasting Participation Guidelines 2010 ['the Guidelines'].

Policy Family 3 deals with how Lofty fulfils its licence obligations in terms of community participation.

### Scope and context

Lofty was set up as a conduit for members of the Adelaide Hills community to take ownership of their own slice of the media landscape. Whilst being a not-for-profit incorporated association, Lofty has a strong culture of empowering its' members to feel a sense of ownership.

As every member feels they own a part of Lofty, this further advances our aim to grow into a valuable community and cultural resource for Adelaide Hills residents to enjoy in perpetuity.

Policy Family 3 (Participation) expands upon and provides some interpretation surrounding section 5 of the Guidelines. To assist in the reader in making connections between the Guidelines and Policy Family 3, a *compliance alignment grid* can be found in Appendix A.

### Participation factors

Factors relation to community participation are documented Policy Family 3.

To provide clarity, policies have been grouped into subfamilies as thus:

<b>Subfamily</b>	<b>Name/Description</b>
3.1 Participation > Membership	Member-specific policies
3.2 Participation > Volunteers	Volunteer-specific policies
3.3 Participation > Other rights and obligations	Policies relating to all participants in Lofty, including but not limited to members and volunteers.
3.4 Participation > Conflict resolution	Policies relating to the resolution of internal disputes. Applicable to all participants in Lofty, including but not limited to members and volunteers.



## Appendix A – Compliance Alignment Grid

In order to assist the reader's navigation of Lofty's policies in the context of the Guidelines, we have designed a compliance alignment grid.

<b>Guideline</b>	<b>Description</b>	<b>(Policy Family) – Applicable Policies</b>
5.1	What does 'encourage' mean?	3 (Participation) 3.1.2
5.2	What is sound corporate governance?	1 (Corporate Governance) All
5.3	What is open membership?	3 (Participation) 3.1.1 and 3.1.2
5.3	How can licensees attract members?	3 (Participation) 3.1.2
5.3	How should licensees deal with membership applications?	3 (Participation) 3.1.2
5.5	What is the role of volunteers?	3 (Participation) 3.2.1
5.7	What is the role of committees?	1 (Corporate Governance) 1.0.4, 1.2.1 to 1.2.5



## POLICY DOCUMENT 3.0.2

<b>Policy Name (full)</b>	Participation > Opportunities
<b>Policy Family</b>	3 – Participation
<b>Version/Date</b>	V1.0 1 September 2019
<b>Maintained By</b>	Board

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### PRECIS

One of Lofty's objectives is to provide opportunities to community members to participate in Lofty's operations. This policy explains opportunities available to Lofty members ranging from operations to strategy and governance.

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### Introduction

As per the Lofty Constitution, one of the Association's objectives is to provide the opportunity for community members to be involved in the production and presentation of original programs.

In addition to on-air roles, members are encouraged to build their skills by participating in other aspects of Lofty's operations. Encouragement is given to any member seeking to participate in the formation of Lofty's strategy by way of Board membership, along with opportunities to join Subcommittees and project groups.

### Scope and context

Policy Family 3 (Participation), whilst written with the Community Radio Broadcasting Codes of Practice (the Codes) in mind, is applied across all of Lofty's operations.

Whilst Lofty has a broadcasting licence, our organisation is multi-faceted and constantly evolving. As such, there are always opportunities to participate in Lofty in an operational capacity and/or a strategic capacity.

For our purposes *strategic* refers to anything involving the Board and/or Subcommittees, whereas *operational* refers to day-to-day tasks carried out by members. Many members participate in Lofty in both strategic and operational contexts, and it could be argued that some of the best strategists come from a solid operational background.

#### *What the Code says*

- 2.2 Our policies and procedures will include mechanisms to enable active participation by our community in station management, programming and general operations.

#### *What Lofty does*

- Lofty has a Board with clearly defined roles, tenures and election proceedings pursuant to the Lofty Constitution.
- Lofty has a number of Subcommittees that oversee both strategy and operations of specific functions within the organisation, including programming, community engagement and technology.
- Lofty utilises Coordinators to act as a central point for member queries, as well as assisting with interactions between the Subcommittees and the Board.

All of the above roles are unpaid, and are available only to Lofty members. Any Lofty member aged 18 years or over may be appointed to any of the above roles.

Members under 18 years of age may be appointed to a Subcommittee, but may not be appointed to the Board or as Station Manager, as these roles may need to enter into binding agreements from time to time, which a minor is legally forbidden from doing.

### *How Lofty does it*

For operational roles, the membership application form is used to assist Lofty in working out how best to deploy a new member's talents and experience.

Subcommittees and working groups draw upon the overall member base for their respective populations.

The Board is elected in terms of Lofty's Constitution. A Board Member's tenure is two years, with 50% of Board positions being contestable at each Annual General Meeting (AGM). To ensure good governance, Lofty has dedicated an entire section of its Constitution defining how the Board is elected and how it operates (Part D – Governance viz. rules 22-35).

Lofty encourages any member that wishes to run for the Board at the next AGM to speak with current Board members to get a feel for the expectations that Lofty has of its Board. Whilst Board membership can be challenging, it can also be very rewarding.

## **Appendix 17.6**

### **Programming**

Lofty Policy Family 4



## POLICY DOCUMENT 4.0.1

<b>Policy Name (full)</b>	Radio Programming Overview
<b>Policy Family</b>	Document Series 4 – Programming
<b>Version/Date</b>	V1.1 6 November 2019
<b>Maintained By</b>	Programming Sub-committee

<b>PRECIS</b>	Introduction to general programming policies and procedures in relation to Lofty's terrestrial and online radio broadcasting activities.
<b>SCOPE</b>	Radio broadcasting, radio streaming.

### Introduction

Lofty's Radio Programming Policy is designed to meet the objectives of the Association as set out in Rule 3 of the Constitution. Specific focus areas within the Policy include, but are not limited to:

- Local and Australian Music Content
- Contentious content, including but not limited to religious or political content
- Guidelines for content producers seeking to join Lofty
- Processes and procedures for the assessment of new programming submissions
- Management of existing programming
- Content of local relevance (including programming produced outside of the local area)
- News and current affairs
- Playout system
- Access programming
- Sponsorship and programming

For extra clarity, Lofty has divided its Programming Policy Family into two Subfamilies: Code Considerations (4.1.x) and Community (4.2.x).

### Purpose

This policy is intended to ensure that:

- expectations between Lofty and its members in relation to programming matters are clearly defined and are therefore able to be readily met; and
- key objectives within Lofty's overall programming strategy are considered.

### Policy

#### *Programming Framework*

We use the framework set out in the Community Radio Broadcasting Codes of Practice 2008. In terms of Lofty's programming framework, we have policies and procedures designed to encourage participation in Lofty's programming from as many people in our community as possible (refer Policy Subfamily 4.2.x).

This is either via the creation of programming to be distributed by Lofty, or via the opportunity to join the Programming Subcommittee to guide Lofty's programming output within the context of Lofty's Constitution and Policy Documents.

#### *Diversity and independence.*

As per Code 2, Lofty values the diversity of thought among its volunteers. Lofty's programming is diverse, and is intended to serve sectors of the community that may not currently be adequately served with special interest programming.

In terms of Code 6, Lofty shall not allow sponsors to have any influence in programming decisions whatsoever. The Board reserves the right to take disciplinary action against any person that wilfully and/or deliberately allows sponsors to influence programming, as per Policy 4.1.2.

#### *Programming Sub-committee.*

As per Code 2, Lofty values the diversity of thought among its volunteers. Lofty's programming is diverse, and is intended to serve sectors of the community that may not currently be adequately served with special interest programming.

As with all sub-committees, Lofty's Programming Sub-committee policy resides in Policy Family 1 (Governance). Policies relating to the administration, composition and scope of the Programming Sub-committee is documented in Policy 1.2.4.



## POLICY DOCUMENT 4.0.2

<b>Policy Name (full)</b>	Programming - Proposals
<b>Policy Family</b>	Document Series 4 – Programming
<b>Version/Date</b>	V1.1 6 November 2019
<b>Maintained By</b>	Programming Sub-committee

<b>PRECIS</b>	This policy describes the mechanisms with which individuals or non-individuals within Mount Barker RA1 may submit programming proposals.
<b>SCOPE</b>	Radio broadcasting, radio streaming.

### Introduction

In the interests of encouraging community participation in its operations, Lofty welcomes program proposals from people residing within Mount Barker RA1.

This policy discusses how new program proposals are to be presented to Lofty, as well as explaining what happens after a program proposal has been considered by the Programming Sub-committee.

### Submitting a programming proposal

To simplify the program proposal process for both the Proposer and Lofty, all program proposals shall be made via Lofty's prescribed format:

If you are an <b>individual</b>	If you represent a <b>group or non-individual</b>
Lofty Program Proposal (Individuals)	Lofty Access Application (Non-individual)

For the purposes of this policy, "Proposal" shall be interchangeable with "Lofty Program Proposal (Individuals)" and/or "Lofty Access Application (Non-individual)" from this point until the end of this document.

Acceptance of a Proposal is not guaranteed, and is subject to assessment by Lofty's Programming Sub-committee.

Proposals are assessed in terms of Lofty's Programming Policies, all of which are aligned with one of more of the following:

- Community Radio Broadcasting Codes of Practice 2008 ["the Codes"]
- Community Broadcasting Participation Guidelines 2010 ["the Guidelines"]
- Broadcasting Services Act 1992 (Cth) ["the Act"]
- The current version of the Lofty Community Media Incorporated Constitution ["the Constitution"]

## Decisioning

The decision to accept or decline a Proposal is at the discretion of Lofty's Programming Sub-committee.

### *Acceptance*

Should a Proposal be *accepted* where the Proposer is an individual<sup>1</sup>, said Proposer - if not already a Lofty member – will need to apply to join Lofty as a member. Said application is to be assessed in terms of policy and Rule 16 of the Lofty Constitution.

Where the proposer is not an individual e.g. consortium representing a community interest, incorporated association etc., the program shall be accepted on an Access basis in terms of policy 4.0.3.

### *Non-acceptance*

Should a Proposal be declined, Lofty shall advise the Proposer of this decision in writing.

When advising that a Proposal has been declined, Lofty is to provide feedback as to why said Proposal was declined.

Where appropriate, feedback may also include advice relating to how the declined Proposal could be amended in order to achieve closer alignment with Lofty's Programming Policies.

Should the Proposer choose to amend and resubmit their Proposal, the Proposer is to resubmit the proposal to the Programming Sub-committee for consideration at their next regularly scheduled meeting.

The Programming Sub-committee is to reassess said revised Proposal on a standalone basis and on its own merits i.e. without reference to the previous submission(s) made by the Proposer.

### *Recourse*

Where a Proposal has been declined, the Proposer may seek a review of this decision.

A request for review shall be lodged to the Lofty Board *in writing*, with said review being undertaken at the next regular Board meeting or within forty-five (45) days of being submitted, whichever occurs first.

During the review, the Board shall consider how the Proposal *as submitted* aligns with Lofty's Programming Policies, as well as reviewing the rationale behind the Programming Sub-committee's decision.

Upon completing the review, the Board is to advise the Proposer as to its outcome. Should the Proposal be accepted, the Proposer is to commence the membership/access application process as per *Acceptance*.

Should the Proposal be declined, the Board shall provide advice to the Proposer *in writing*, providing a clear explanation of why the Programming Sub-committee's original decision has been upheld.

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<sup>1</sup> As defined in section 2B of the Acts Interpretation Act 1901 (Cth)



## **General considerations**

Prior to submitting a Proposal, Lofty recommends that the Proposer reviews Lofty's Programming Policies, as well as the Code, the Guidelines and the Lofty Constitution.

The rejection of a Proposal shall have no bearing on future Proposals as tendered by the Proposer.

Where the Proposer is an individual, said rejection shall not be taken into account should the Proposer should they choose to become a Lofty member either at the time of rejection, or at any point in the future.

Where the Proposer is not an individual, said rejection shall not be taken into account should any individual associated with the Proposer choose to become a Lofty member either at the time of rejection, or at any point in the future.

## APPENDIX A – PROGRAM PROPOSAL (INDIVIDUAL)



### PROGRAM PROPOSAL – INDIVIDUALS

Before being offered airtime on Lofty, our Programming Sub-committee needs to learn about your proposed program, and assess the proposal in the context of Lofty's Programming Policies. Please complete the following program proposal form and submit to [info@lofty.org.au](mailto:info@lofty.org.au). Lofty will only offer on-air slots, either live or pre-recorded, to **paid** members that have completed the Program Proposal process.

*Should you wish to propose a program on behalf on an entity that is not an individual, you will need to complete an Access Proposal form.*

<b>Full name</b>			<b>Preferred given name</b>	
<b>Home address</b>				
<b>Postal address (if applicable)</b>				
<b>Preferred phone number</b>			<b>Preferred email address</b>	
<b>Do you have radio broadcasting experience?</b> If Yes, please specify stations and dates/years. If available, please provide an aircheck of no longer than 10 minutes' duration in MP3 format (preferably sent via email, Dropbox or Google Drive) and a copy of a music log from one of your shows.				
<b>Do you have podcasting or audio production experience?</b> If Yes, please give details of your podcast (if it is still online), or a sample podcast or audio production of no longer than 10 minutes' duration in MP3 format, either attached via email or shared via cloud storage (e.g. Dropbox or similar).				
<b>Briefly describe your proposed program.</b> Format, length, frequency, preferred daypart etc.				

Lofty Program Proposal Form (Individuals) V2.0 – November 2019

<p><b>Why do you believe the proposed program is relevant to Lofty's local audience?</b></p>		
<p><b>If your program is music based, please give a brief summary of musical genres/featured artists.</b>  For experienced broadcasters, a copy of a previous music log or playlist is sufficient (a Spotify playlist of same is desirable but not essential).  New broadcasters may wish to compile a Spotify playlist or similar as a demo. Should you wish to submit a Spotify playlist as part of your Program Proposal, please copy the playlist link from Spotify and paste it in your submission email.</p>		
<p><b>DECLARATION</b></p>		
<p>I confirm that I (a) am current paid member of Lofty Community Media Incorporated (Lofty) or (b) shall apply for paid membership to Lofty upon approval of my program proposal.</p>		<p><b>TICK</b></p>
<p>My program proposal complies with Lofty's Programming Policies, and will not contain material that may breach Lofty's Policies, the Community Radio Broadcasting Codes of Practice 2008 and/or the Broadcasting Services Act 1992 (Cth).</p>		
<p>Upon acceptance of my program proposal, I shall undertake compliance training as directed by Lofty, and will be unable to broadcast until said training has been completed. Lofty will provide this training at no additional cost to me.</p>		
<p>Should I be offered a program on Lofty, I agree to submit a music log as soon as practicable after my show has been aired, or as otherwise directed by Lofty.</p>		
<p>I acknowledge that this application is <b>not a guarantee</b> of airtime. Should my Program Application be declined, I may be invited to enter into correspondence with the Programming Sub-committee for negotiation of a mutually agreeable outcome.</p>		
<p> </p>		
<p> </p>		
<p>Applicant Signature</p>	<p>Parent/Guardian Signature (for applicants under 18 years of age)</p>	<p>Date of application</p>

## APPENDIX B – ACCESS PROPOSAL (NON-INDIVIDUAL)

### ACCESS PROPOSAL (Non-Individuals)



Before being offered airtime on Lofty, our Programming Sub-committee needs to learn about your proposed program, and assess the proposal in the context of Lofty's Programming Policies. Please complete the following program proposal form and submit to [info@lofty.org.au](mailto:info@lofty.org.au). Lofty will only offer on-air slots, either live or pre-recorded, once an Access Agreement has been executed by both the Accessor and Lofty.

*Should you wish to propose a program on your own behalf as an individual, you will need to complete a Program Proposal (Individual) form.*

Entity name			
Registered address			
Postal address (if applicable)			
Email address			
Website (if applicable)			
Contact name (Rep 1)		Rep 1 mobile number	
Contact name (Rep 2)		Rep 2 mobile number	
Contact name (Rep 3)		Rep 3 mobile number	
<b>Do any of your proposed presenters have radio broadcasting experience?</b> If Yes, please specify stations and dates/years. If available, please provide an aircheck of no longer than 10 minutes' duration in MP3 format (preferably sent via email, Dropbox or Google Drive) and a copy of a music log from one of their shows where applicable.			
<b>Briefly describe your proposed program.</b> Format, length, frequency, preferred daypart etc.			

Lofty Access Proposal Form (Non-Individuals) V 1.0 – November 2019

How does your proposed program meet a community need?	
<p>If applicable, please attach supporting information in support of the community need your proposed program expects to meet. This may be in the form of surveys, letters of support from interested community groups or individuals, Census data or any other document that may assist Lofty in establishing that providing access meets a community need as defined in Lofty Programming Policy 4.2.1.</p>	
<div style="border: 1px solid black; height: 150px; width: 100%;"></div>	
DECLARATION	TICK
We confirm that approval of our program proposal is subject to an Access Agreement, as executed by us and Lofty. An access charges form part of said Agreement, and said charge payable as per the Agreement. Should we fall into arrears with our access charges, Lofty may suspend our access until our account is restored.	
Our program proposal complies with Lofty's Programming Policies, and will not contain material that may breach Lofty's Policies, the Community Radio Broadcasting Codes of Practice 2008 and/or the Broadcasting Services Act 1992 (Cth).	
Upon acceptance of our program proposal, our nominated presenter(s) shall undertake compliance training as directed by Lofty, and will be unable to broadcast until said training has been completed. Lofty will provide this training at no additional cost to either us or the nominated presenter.	
Each nominated presenter shall provide Lofty with a current National Police Certificate (or equivalent). Where a nominated presenter is working with children and/or vulnerable persons, a current Working With Children check is also required.	
Should we be offered a program on Lofty, we agree to submit a music log as soon as practicable after my show has been aired (where applicable), or as otherwise directed by Lofty.	
We confirm that we are authorised to enter into contractual agreements on behalf of the abovenamed Entity, with said authorisation being attached to this Access Proposal.	
We acknowledge that this application is <b>not a guarantee</b> of airtime. Should our Access Application be declined, we may be invited to enter into correspondence with the Programming Sub-committee for negotiation of a mutually agreeable outcome.	

Executed on behalf of the abovenamed Entity pursuant to Section 127(1) of the Corporations Act 2001.

Signature	Signature	Date of application
Name	Name	
Position held	Position held	



## POLICY DOCUMENT 4.0.3

<b>Policy Name (full)</b>	Programming – Access Programming
<b>Policy Family</b>	Document Series 4 – Programming
<b>Version/Date</b>	V1.1 6 November 2019
<b>Maintained By</b>	Programming Sub-committee

<b>PRECIS</b>	This policy explains how Lofty applies section 6.4 of the Community Broadcasting Participation Guidelines 2010 in offering paid access to non-individuals seeking to broadcast programming of local significance to meet a community need.
<b>SCOPE</b>	Radio broadcasting, radio streaming.

### Introduction

A condition of presenting a program on Lofty is that the presenter must be a current Lofty member. As Lofty's Constitution only allows for natural persons to become members, Lofty is unable to extend member privileges to non-individuals.

This policy sets out how Lofty may offer access programming, and how said access is offered in terms of Section 6.4 of the Community Broadcasting Participation Guidelines 2010 ["the Guidelines"].

### Access and the Guidelines

Section 6.4 of the Guidelines considers Access Programming in the form of a question:

#### **6.4 CAN LICENSEES CHARGE FOR AIRTIME?**

*Sale of airtime is one legitimate way to encourage community participation by giving individuals or groups an opportunity to contribute to the program schedule. However, it is important to keep in mind that a condition of community broadcasting licences is that licensees must not be operated for profit or as part of a profit-making enterprise. Also, licensees remain legally responsible for all material that goes to air.*

*Licensees can charge for airtime as long as airtime fees are reasonable and the procedure for deciding access to airtime is fair and transparent.*

[...]

### **Community radio**

*The Act does not specifically provide for the sale of airtime on community radio. However, the sale of airtime on community radio is a legitimate method for ensuring community involvement as long as the sale of airtime is consistent with licence conditions (for example, the community participation and community representation requirements and the requirement that the service not be operated for profit or as part of a profit-making enterprise) and the community purpose of the service.*

*Community groups (for people from a particular ethnic or cultural background, for example) may participate in a service by purchasing airtime to provide programs to ensure their needs are adequately met.*

## Access Proposals

A non-individual may seek access to airtime on Lofty on a paid basis by submitting an Access Application (Non-individual) Form. An example form is shown as Appendix B in Policy 4.0.2.

## Assessment of Access Proposals

An Access Proposal shall be assessed by Lofty's Programming Sub-committee in the same manner in which a Program Proposal from an individual is assessed, as per Policy 4.0.2.

## Access Programming considerations

The Guidelines include advice on how to sell airtime (Access Programming).

Guideline advice	Lofty's interpretation
use a transparent method to determine airtime fees	Airtime fees are clearly set out in an Access Agreement ["the Agreement"] executed by Lofty and the Accessor.
charge a reasonable rate for airtime, with concessional rates for certain individuals (for example, pensioners and students)	Lofty does not <i>directly</i> charge individuals for airtime. However, as airtime for an individual is subject to said individual being a paid member of Lofty, this may be considered a form of <i>indirect</i> charge for airtime. Rule 21(c) of the Lofty Constitution calls for Lofty to discount membership fees by fifty percent (50%) where a member fulfils one of more of the following criteria: <ul style="list-style-type: none"><li>- under 18 years of age</li><li>- a full-time student</li><li>- a Commonwealth Health Care Card holder</li><li>- a Seniors Card holder</li></ul>
apply airtime fees fairly and consistently	Lofty does not expect any significant discrepancies in airtime fees charged to each Accessor. In some cases, Lofty <i>may</i> propose an airtime fee that is an outlier when compared with comparable Agreements. An airtime fee may be moved out of the standard range based on the Accessor's capacity to pay. For example, an Accessor that has just lost a significant portion of ongoing grant funding may be offered airtime at a reduced rate.
ensure the service is not operated for profit or as part of a profit-making enterprise	Lofty is a not-for-profit Incorporated Association registered in South Australia. Operating an Incorporated Association for profit or as part of a profit-making enterprise is a breach of the Incorporates Associations Act 1985 (SA).
monitor their program schedule to ensure it continues to reflect the needs of the service's community.	The Programming Sub-committee undertakes regular reviews of all programming (including Access Programming) to ensure said programming continues to meet community needs.

### **Other Agreement considerations**

The Agreement sets the rights and obligations of both the Accessor and Lofty in relation to accessing airspace. The following parameters are also set in the Agreement:

- airspace pricing, including provisions for future adjustment viz. CPI increases etc.;
- length of the Agreement;
- any Conditions and/or Conditions Precedent as negotiated between Lofty and the Accessor (where applicable);
- provisions/conditions relating to early termination of the Agreement, as instigated either by the Accessor or Lofty.





## POLICY DOCUMENT 4.1.1

<b>Policy Name (full)</b>	Programming > Local and Australian Music Content
<b>Policy Family</b>	4 – Programming
<b>Version/Date</b>	V1.2 20 October 2019
<b>Maintained By</b>	Programming Subcommittee

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<b>PRECIS</b>	Clearly defines Lofty's commitment to ensuring that Australian music quotas pursuant to Code 5 are exceeded, as well providing guidelines on engaging with local musicians. This Policy also outlines Lofty's compliance procedures.
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<b>SCOPE</b>	Radio broadcasting, radio streaming.
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### Introduction

Community broadcasters are renowned for supporting new, local, independent and particularly Australian music. Many musicians have had their first airplay and interviews on our stations. We are in a unique position to play and engage with a broad range of musical styles. Our support of the music industry and diverse music played is one of the key reasons people listen to community radio.

The [2006 McNair Audience Research Survey](#) shows that two key reasons people listen to community radio stations are:

- 'They play Australian music/support local artists'
- 'Specialist music or information programs'

### Purpose

This policy is intended to ensure that Lofty:

- continues to play a diverse range of music throughout all of our programming,
- supports local musicians, and
- complies with the 25% Australian music requirement of the Codes by aiming for 50% Australian music across all general programming. This allows for specialist programs (music and/or talk based) which may not be able to meet the 25% quota (see #2 under Policy below).

### Policy

#### 1. Quota

- a. Code 5.2 calls for at least 25% Australian music content broadcast per calendar month.
- b. Lofty's policy calls for at least 33% Australian music content broadcast per 168 hour calendar week.

#### 2. Diversity

- a. Presenters/producers are actively encouraged to provide a wide range of musical styles whilst taking into account Lofty's aims and objectives, alongside the individual program's aims and objectives.
- b. When formulating playlists, Lofty expects presenters/producers to include at least 25% Australian music content, unless:
  - the program's aim is to focus on music or culture other than Australian; or
  - the music featured in a *specialist* music program has a lower participation rate among Australian musicians, and therefore fewer Australian recordings may be available.

A non-exhaustive list of genres and whether they are deemed to have a lower participation rate among Australian artists can be found in Appendix A.

3. All Australian recordings that are the property of Lofty, including but not limited to hard copies and/or electronic media will be visibly identified as Australian.
4. All presenters are required to complete and hand in a music log sheet after each program.
5. Random audits of Australian music content are to be conducted at least four (4) times per calendar year.
6. Presenters are encouraged to, within the confines of the sponsorship framework, promote events where local musicians are featured.
7. Presenters must not make representations to record companies or other music suppliers on behalf of Lofty unless prior consent has been given by the Programming Committee and/or the Board.
8. Lofty shall not accept any form of payment in cash or in-kind, in return for providing airplay or promotion of music, except under standard sponsorship arrangements.
9. Presenters shall not accept any form of payment in cash or in-kind, in return for providing airplay or promotion of music. Where a presenter is approached by a musician, promoter, manager, recording label or any associated entities with such a proposal, this is to be referred to the Station Manager, a Programming Committee member or the Board as soon as practicable.
10. Where a presenter has been found in breach of the above, Lofty reserves the right to address said breach pursuant to Rule 50 of the Lofty Constitution.

### **Local music**

Local music is defined as music performed by artists where:

- they are a current resident of South Australia; or
- where said artist identifies as South Australian; and
- said recording was made in Australia.

Whilst Lofty has no set quota of local music, our playlist is configured to play around 20% local music at the time of writing.

### **Engaging with local musicians**

Many of our presenters engage with local music on a regular basis, either on a proactive basis (i.e. attending local gigs, meeting artists via online and offline social networking etc) or a reactive basis (i.e. direct contact from artists via email, direct messaging etc).

In addition, Lofty fields enquiries from local artists via its general channels on a regular basis viz. email, social media and web forms. We also engage with local venues, both to increase reach within the South Australian music community and to create sponsorship opportunities for Lofty.

Specialised channels to enable easier access to Lofty for local artists are currently under development, including but not limited to the option of submitting music directly to Lofty's website for consideration by either the Programming Subcommittee and/or individual presenters prior to airing.

We warmly extend an invitation to local artists to perform live on air.

## **Playout system**

Lofty's automatic programming, as managed by RadioDJ, shall be configured to play a minimum of 50% Australian content when the studio is unattended and in Automated/AutoDJ mode. By doing this, Lofty expects to meet its self-imposed quota of 33% Australian content over a 168 hour broadcast week whilst allowing for the exploration of genres where Australian participation is relatively low, as per Appendix A.

Where live and/or specialist music programming places Lofty at risk of not meeting its self-imposed quota of 33%, the Programming Subcommittee may order the reconfiguration of RadioDJ to increase the minimum Australian selected when the studio is unattended and in Automated/AutoDJ mode.

## **Reporting and auditing**

Live presenters are expected to complete a Music Running Sheet in terms of standard Lofty procedures. The current version as of the date of this policy is contained in Appendix B, however the Music Running Sheet is subject to change without notice. Any such changes to the Music Running Sheet shall be communicated to all Lofty presenters as soon as practicable.

The Programming Co-ordinator or other delegated member is to conduct periodic audits of Australian music content, with data for said audit to be collected from:

- RadioDJ playout history reporting
- Music Running Sheets as completed by presenters
- Playlists or running sheets from syndicated content providers

Where a syndicated content provider is unable to provide a running sheet or playlist, the auditor shall assume that 0% Australian content is contained within said syndicated program.

## APPENDIX A – Genres and their respective participation rates among Australian artists

Based on a number of avenues of research, including but not limited to:

- Code 5.2 (b), where the Australian music quota for ethnic and classical music stations is set at 10%.
- Availability of tracks within specific genres offered via the Australian Music Radio Airplay Project (AMRAP).

Where a genre is deemed to have a high participation rate, Lofty's expects presenters/producers to observe Code 5.2(a) viz. 25% Australian music quota.

This list is not exhaustive. Should you wish to feature a genre not listed below, or if you're uncertain about how to classify tracks you may wish to play, please refer to the Programming Subcommittee for guidance.

Genre	Sub-Genre	Years	Participation
Americana	Including Bluegrass	All years	Low
Blues	All sub-genres	All years	Low
Classical	All sub-genres	All years	Low
Country	Alt Country	1990-2010	Medium
Country	Alt Country	2010-present	High
Country	Traditional	1950-present	Medium
Disco	All sub-genres including Nu-Disco	All years	Low
EDM	House (all sub-genres)	1980-present	Low
EDM	Techno (all sub-genres)	1980-present	Low
EDM	Trance (all sub-genres)	1990-present	Low
Electronica	All electronica that is not EDM	All years	Low
Folk	Acoustic folk music including Roots	1950-2010	Medium
Folk	Acoustic folk music including Roots	2010-present	High
Folk	International folk music (see World Music)	All years	Low
Funk	All sub-genres	All years	Low
Heavy Rock	Metal, punk, hardcore (all sub-genres)	1965-2000	Low
Heavy Rock	Metal, punk, hardcore (all sub-genres)	2000-2010	Medium
Heavy Rock	Metal, punk, hardcore (all sub-genres)	2010-present	High
Hip-Hop/Rap	All sub-genres	1978-2005	Low
Hip-Hop/Rap	All sub-genres	2005-2010	Medium
Hip-Hop/Rap	All sub-genres	2010-present	High
Jazz	All sub-genres	All years	Low
Pop	Britpop (including shoegaze and variants)	1985-present	Low
Pop	New Wave, New Romantic, Synthpop	1978-1988	Medium
Pop	Top 40, commercial pop	1960-present	High
Pop/Rock	Indie/Alternative	1970-1990	Low
Pop/Rock	Indie/Alternative	1990-2005	Medium
Pop/Rock	Indie/Alternative	2005-present	High
Rock	Light rock, medium rock, pop-rock etc	All years	High
Rock	Progressive rock including Krautrock	1965-present	Low
Rock	Psychedelic rock	1965-2010	Low
Rock	Psychedelic rock	2010-present	Medium
Soul	All sub-genres including traditional R&B	All years	Low
World Music	Any genre in languages other than English	All years	Low



# PROGRAM MUSIC RUNNING SHEET

Please complete this sheet and submit to Lofty either prior to, during or as soon as possible after your show.

Submissions are accepted both electronically (email [info@lofty.org.au](mailto:info@lofty.org.au)) and via paper (program sheet tray located in the office). Should there be insufficient room on this sheet, please complete an additional sheet and attach it to this one.

Note: For compliance purposes, presenters whose programs contain 100% talk-based content will still need to submit a nil return (i.e. a sheet with only their name, program name, air date/time and episode number (if known)).

Program  
Name

Presenter

Air date/time

Episode number (if  
known)

Time aired <sup>i</sup>	Source <sup>ii</sup>	Track no. <sup>iii</sup>	Artist	Title	Length (mm:ss)	Artist origin <sup>iv</sup>





## POLICY DOCUMENT 4.1.3

**Policy Name (full)** Programming > Political and Election Matter  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

This policy establishes how Lofty maintains the integrity of its Constitution; ensuring that Lofty's constitutional brief to remain apolitical is upheld whilst respectfully acknowledging the role of politics in today's society.

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### Introduction

Rule 6 of the Lofty Community Media Incorporated Constitution states that Lofty is apolitical and secular ("Rule 6"). In practice, Rule 6 broadly means:

- Lofty shall not be controlled by a faction driven by political or religious ideologies to the detriment of the rest of the member cohort; and
- Lofty respectfully refuses to allow itself to become a platform for political or religious ideologies to be actively promoted; because
- Lofty values and respects every individual member and their basic human rights, irrespective of said member's political and/or religious leanings; however, Lofty expects every individual member to allow every other member the same courtesy.

Due to the pervasive and potentially divisive nature of both politics and religion, there are policies across several policy families that define how Lofty and its members navigate such societal constructs in an objective and respectful manner.

In the context of the Programming and Music Policy Family (Document Series 4), we have defined distinct types of programming matter subject to this policy: Political Matter, Election Matter and Religious Matter.

Please refer to Policy 4.1.4 in relation to Religious Matter.

### Scope and Context

In its role as a trusted member of the communities in which it operates, Lofty needs to engage with all tiers of Government (viz. Local, State, Federal) during its normal course of business.

This policy is designed to ensure that day-to-day relationships with all tiers of Government remain productive. Furthermore, this policy sets clear demarcation between elected representatives and the departments, regulators and/or other authorities with whom Lofty has dealings in the usual course of business.

Lofty also acknowledges that its programming, particularly relating to news and current affairs, may raise stories dealing with elected representatives at any or all tiers of Government, either in Australia or overseas. This policy sets clear expectations of how this layer of programming is managed.

In order to maintain Lofty's high standards of impartiality, Lofty and/or its representatives must refrain from editorialising on Political Matters, minimise coverage of election matters and ensure that any other matters to which an opinion may be attached (such as human rights) are clearly defined as being the opinion of the individual that gave it, and does not represent the opinion of Lofty.

Referencing historical events in political history is also acceptable, as said event is unlikely to have political currency. As such, its historical and/or educational value far exceeds any limited residual political value said event may hold.

Also, Lofty appreciates the rich history of protest songs in modern music. In the broader context of today's society, including but not limited to modern history, many such tracks are culturally significant.

On this basis, protest songs are not deemed to be "Political Matter" for the purposes of this policy

### Political Matter

The following table gives a number of examples of "political matter", along with how Lofty and its members shall address this matter.

This list is definitely not exhaustive, and we strongly encourage members with any concerns or doubts about a current or potential program or subject to approach the Board for further guidance.

Example	Action
A local Councillor wishes to come on air and provide regular reports on the outcome of Council Meetings.	<p><b>Political Matter</b>, but easy to neutralise and turn into relevant community matter.</p> <p>As presented, the reports would be delivered by an elected member, this is not permissible.</p> <p><i>However</i>, due to the nature of the content (i.e. reports of a Council Meeting where the minutes of said meeting are on the public record), a paid <u>staff member</u> from the Council would be permitted to give such reports.</p> <p>The expectation is that the Council would provide written authorisation to Lofty to permit their staff member to report on Council Meetings, and said staff member would adhere to the Council's Media Policy.</p> <p>The reports would most likely commence once said written authority from the Council is held, and the Lofty Board has authorised the commencement of said reports to go to air.</p> <p>As such, what was originally presented as political matter has been successfully converted into valuable community information.</p>



<p>A local resident is lobbying the local Council, along with State and Federal Governments to fund the installation of traffic lights at a busy intersection.</p>	<p><b>Potential Political Matter. Refer to the Programming Subcommittee</b> for determination.</p> <p>During an election period, this story would not be permitted due to the very high likelihood of said story being spun into electoral matter.</p> <p>Outside of an election period, this story may be suitable as a form of community engagement.</p> <p>In the latter case, the Programming Subcommittee may rule that this story is acceptable for Lofty to air, but only as a pre-recorded interview with the concerned resident. This would allow Lofty to – if necessary – depoliticise the interview whilst maintaining the integrity of the underlying message, being that action is required to achieve a positive outcome for the community.</p>
<p>An international news program airing an Op-Ed piece from a Human Rights Lawyer in response to alleged human rights abuses in another country.</p>	<p><b>Not Political Matter.</b> Whilst this an opinion piece, it forms part of an international news program where an expert on a particular topic has provided extra context relating to the allegations of human rights abuses.</p> <p>This may include a brief explanation of the regime that is allegedly responsible for said abuses, as the regime is a significant factor in human rights violations and the listener may not be aware of the back story behind the main story i.e. human rights violations in another country, allegedly perpetrated by said country on its own citizens.</p>
<p>A NAIDOC week special, featuring protest songs by indigenous and non-indigenous Australian artists, followed by a replay of Kevin Rudd's Apology to the Stolen Generations.</p>	<p><b>Not Political Matter</b>, as long as the presenter does <i>not</i> add their own political opinion to the program.</p> <p>Protest Songs are exempt from this policy.</p> <p>Kevin Rudd's Apology to the Stolen Generations, whilst being made in Parliament whilst he was Prime Minister, was a significant moment in Australian history. As such, this speech would be deemed <i>historical matter</i> and not Political Matter, as said speech was given in 2008 and therefore its historical and educational value far exceeds any limited residual political value.</p>
<p>The local Federal Member of Parliament would like to do an on-air shift for an hour where she rates her Top 10 1980s one-hit wonders.</p>	<p><b>Refer to the Programming Subcommittee.</b></p> <p>This would not be permissible during an election period, as – even if said Member talked about nothing other than music for an hour – this <i>may</i> be interpreted as campaigning and therefore be classed as <b>Election Matter</b>.</p>

	<p>Outside of an election campaign, it is likely that such a program would be allowed as a once-off, but under strict instructions to avoid “talking shop”, and to refrain from talking up what she has achieved during her time as the local Member.</p> <p>The presenter has a key role in this, as he or she needs to leave their own personal biases outside of the conversation, especially if said biases are in favour of said local Member.</p> <p>The Board reserves the right to place sanctions against the presenter – including but not limited to suspension or expulsion from Lofty – should the presenter fail to maintain neutrality – either their own or their guest’s - during said program.</p>
<p>A candidate running for Mayo at the next Federal Election, despite said election not yet being called, would like to do an on-air shift for an hour where she rates her Top 10 1980s one-hit wonders.</p>	<p><b>Refer to the Programming Subcommittee.</b></p> <p>Most likely a <b>Political Matter</b>, and a potential <b>Election Matter</b>.</p> <p>Even if said candidate talked about nothing other than music for an hour, this <i>may</i> be interpreted as campaigning, even if an election has not yet been called.</p> <p>The Programming Subcommittee may suggest waiting until after the next election before inviting her back, by which time she’ll either be the local Federal Member (see previous example) or just a normal member of the public.</p> <p>Should said candidate be invited to participate in a program under the aforementioned conditions, the Board reserves the right to place sanctions against the presenter – including but not limited to suspension or expulsion from Lofty – should the presenter fail to maintain neutrality – either their own or their guest’s - during said program.</p>

## Election Matter

Election Matter is separate from Political Matter due to its timing and nature. Schedule 2 Part 1 (1) of the Broadcasting Services Act (Cth) 1992 defines Election Matter as:

- (a) matter commenting on, or soliciting votes for, a candidate at the election;*
- (b) matter commenting on, or advocating support of, a political party to which a candidate at the election belongs;*
- (c) matter commenting on, stating or indicating any of the matters being submitted to the electors at the election or any part of the policy of a candidate at the election or of the political party to which a candidate at the election belongs;*

*(d) matter referring to a meeting held or to be held in connection with the election.*

Lofty has adopted the Act's definition of "election", being an election to a Parliament or a local government authority of a State or Territory.

Lofty shall not broadcast, share, distribute or otherwise disseminate Election Matter in any way, shape or form.

Where a candidate, irrespective of tier or political persuasion, approaches Lofty for airtime, said approach must be referred to the Board. Such approaches need to be diarised and then rejected via the correct channels.

Lofty reserves the right to take disciplinary action against a member or members that repeatedly and/or wilfully entertain such advances in a unilateral manner, or promise a platform to any person running for election.

Where a Lofty member has nominated as a candidate in an election, their program may be suspended until the end of the campaign. Depending on the nature of the program and/or the outcome of the election, said program may be reinstated at the Board's discretion.

Where the Board considers there is a conflict of interest between the member's new role and their on-air activities at Lofty, the Board will work with the member to try and maintain their membership of Lofty whilst neutralizing any potential conflicts.

#### *What the Code says*

- 1. In all station activities and our behaviour we will oppose and break down prejudice on the basis of ethnicity, race, language, gender, sexuality, age, physical or mental ability, occupation, religious, cultural or political beliefs.*

#### *What Lofty does*

Lofty aims to be a neutral safe space for both the member and the listener, where people from potentially opposing backgrounds can share common ground in a unified and non-judgmental manner.

In order to protect the integrity of Lofty's neutrality, our Constitution clearly states that Lofty is an apolitical and secular organisation. This means that whilst Lofty welcomes members from any political or religious background to join us, members are not to use their position in Lofty to promote or perpetuate their faith or political agendas to the listener or other members.

To manage expectations of all parties, Policy Document Series 4 – Community Engagement expands upon the points of how Lofty aims to build trust as a respected and impartial media organization.

Policy Document Series 4 – Programming sets a framework to manage content that may deal with political or religious themes, such as news items or music, in such a way that Lofty can meet its brief to entertain and inform the listener without the risk of alienating them by pushing a political or religious agenda. By depoliticizing and secularizing Lofty, we expect to encourage diversity of thought, of cultures and of opinions.

From a personnel perspective, Lofty has clear anti-bullying and anti-harassment policies where the first line of defence against bullying and/or harassment is to educate our people so that it doesn't

happen in the first place.

However, should a member approach the Board with concerns relating to the conduct of another person – irrespective of whether or not the allegations are against a current Lofty member – the Board shall investigate the claims in a fair and objective manner, and reserves the right to impose sanctions against any person or persons found to be involved in acts that contravene Lofty's anti-bullying and/or anti-harassment policies.



## POLICY DOCUMENT 4.1.4

**Policy Name (full)** Programming > Religious Matter  
**Policy Family** 4 – Programming and Music  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

This policy establishes how Lofty maintains the integrity of its Constitution when making programming decisions; ensuring that Lofty's constitutional brief to remain secular is upheld whilst respectfully acknowledging the role of religion in today's society.

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### Introduction

Rule 6 of the Lofty Community Media Incorporated Constitution states that Lofty is apolitical and secular ("Rule 6"). In practice, Rule 6 broadly means:

- Lofty shall not be controlled by a faction driven by political or religious ideologies to the detriment of the rest of the member cohort; and
- Lofty respectfully refuses to allow itself to become a platform for political or religious ideologies to be actively promoted; because
- Lofty values and respects every individual member and their basic human rights, irrespective of said member's political and/or religious leanings; however, Lofty expects every individual member to allow every other member the same courtesy.

Due to the pervasive and potentially divisive nature of both politics and religion, there are policies across several policy families that define how Lofty and its members navigate such societal constructs in an objective and respectful manner.

In the context of the Programming and Music Policy Family (Document Series 4), we have defined three distinct types of programming matter subject to this policy: Political Matter, Electoral Matter and Religious Matter.

Please refer to Policy 4.1.3 in relation to Political Matter and Electoral Matter.

### Scope and Context

A religious belief and/or affiliation may be a deep part of someone's self-identity, and we need to balance the needs of the individual with those of the community at large. The challenge is that beliefs and affiliations vary widely, and some individuals with especially strong faith in their beliefs may find it challenging to accept the opposing beliefs of others.

Lofty is a place of unity, where every member has the right to feel safe and supported irrespective of their beliefs. In order to promote this environment, a conscious decision was made to deliberately quarantine Lofty from any specific religious affiliations.

We are also cognizant of the fact that religion has shaped societies for at least two millennia, and that many historically significant events were influenced by the religion of the day.

In light of these factors, Lofty has taken the decision to set some parameters around the broadcast of Religious Matter, or matter that may be interpreted as Religious Matter. Broadly speaking, this has been divided up into several categories: History and Factual Programming, Music and Evangelism/Science Denial.

Atheism's role is also defined in this policy.

## History and Factual Programming

As part of our brief, Lofty aims to broadcast and produce high quality programming of an educational and informative manner. Such programming may include documentaries or features about history or historical events. Where religion is a key contributor to an historical event, its contribution is to be expressed in a *scholarly* manner and is not to be editorialized.

*Scholarly (method)*: The scholarly method or scholarship is the body of principles and practices used by to make their claims about the world as valid and trustworthy as possible, and to make them known to the scholarly public. It is the methods that systemically advance the teaching, research, and practice of a given scholarly or academic field of study through rigorous inquiry. - Wikipedia

Should you require clarification, please contact the Station Manager, Programming Committee or the Board.

## Music

Since music began, religious references and metaphors have been used by artists across all genres and all eras. Many historically important artists and recordings, most notably African-American musicians, were gospel singers or produced religious music in genres such as blues and traditional R&B.

In order to balance the need to avoid evangelism whilst paying all due respect to the history of modern music, the following rule of thumb is suggested: *the older the song, the more historically interesting it's likely to be. When a song's historical interest exceeds its inherent evangelism, play it. If not, don't.*

The reason for this is because some of the most crucial developments in 20<sup>th</sup> Century music can trace their origins back to religion. Also, there is a big difference between playing Sister Rosetta Tharpe (arguably one of the most influential musicians of the 20<sup>th</sup> Century) and playing Hillsong.

Protest songs are also acceptable, as per Policy 4.1.3 Political and Electoral Matter.

## Evangelism and Science Denial

Evangelism is strictly prohibited. Lofty shall not broadcast any form of evangelising, including but not limited to any form of science denial.

For the purposes of this policy, *science denial* is defined as the promotion of anti-science propaganda driven by religious dogma or other belief. Topics that may fall within this definition include, but are not limited to:

- Creationism
- Climate change denial
- Anti-vaccination, irrespective of any underlying religious motive
- Flat Earth theory

This list is not exhaustive.

Conversely, presenters shall not make fun of science deniers whilst on-air, no matter how tempting it may be. Such editorialising may taint Lofty's image as an inclusive apolitical and secular organisation, and may act as a trigger for potential complainants.

Any presenter that is deemed to have used their show as a platform for such evangelising shall be subject to disciplinary action in terms of Rule 50 of the Constitution.

Lofty shall refuse to accept requests to play spots, syndicated programming or any other on-air content deemed to be religious matter, irrespective of being paid or unpaid to do so.

### **Atheism and Agnosticism**

Lofty shall not promote atheism and/or agnosticism. On-air material related to atheism and/or agnosticism is to be kept to an absolute minimum, and shall be conducted in a scholarly manner.

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### **What the Code says**

- 1. In all station activities and our behaviour we will oppose and break down prejudice on the basis of ethnicity, race, language, gender, sexuality, age, physical or mental ability, occupation, religious, cultural or political beliefs.*

### **What Lofty does**

Lofty aims to be a neutral safe space for both the member and the listener, where people from potentially opposing backgrounds can share common ground in a unified and non-judgmental manner.

In order to protect the integrity of Lofty's neutrality, our Constitution clearly states that Lofty is an apolitical and secular organisation. This means that whilst Lofty welcomes members from any political or religious background to join us, members are not to use their position in Lofty to promote or perpetuate their faith or political agendas to the listener or other members.

To manage expectations of all parties, Policy Family 4 – Community Engagement expands upon the points of how Lofty aims to build trust as a respected and impartial media organization.

Policy Family 4 – Programming sets a framework to manage content that may deal with political or religious themes, such as news items or music, in such a way that Lofty can meet its brief to entertain and inform the listener without the risk of alienating them by pushing a political or religious agenda. By depoliticizing and secularizing Lofty, we expect to encourage diversity of thought, of cultures and of opinions.

From a personnel perspective, Lofty has clear anti-bullying and anti-harassment policies where the first line of defence against bullying and/or harassment is to educate our people so that it doesn't happen in the first place (refer Policy Subfamily 3.3).

However, should a member approach the Board with concerns relating to the conduct of another person – irrespective of whether or not the allegations are against a current Lofty member – the Board shall investigate the claims in a fair and objective manner, and reserves the right to impose sanctions against any person or persons found to be involved in acts that contravene Lofty's anti-bully and/or anti-harassment policies.



## POLICY DOCUMENT 4.1.5

**Policy Name (full)** Programming > Censorship and provocative content  
**Policy Family** 4 – Programming  
**Version/Date** V1.1 23 August 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

On a conceptual level, this policy acknowledges Lofty's desire to maximise freedom of expression within a framework of current societal expectations.

On a practical level, this policy considers language and/or content of a potentially provocative nature. Particular consideration is given to the context in which said language is aired; both in terms of timeslot (i.e. to avoid broadcasting content when minors are likely to be listening) and the role of such language within said content.

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### Introduction

Curiously, legislation is disconcertingly vague in terms of what can and can't be broadcast on community radio. The phrase 'prevailing community standards' is used, which is something of a liberal term.

However, the Code gives us a number of clues as to the types of content to be avoided at all times. Content of this nature is generally eschewed by Lofty and its members, but we are documenting it anyway.

We have chosen to use the phrase 'provocative content', as said content may provoke a response among selected listeners. This includes, but is not limited to, content containing coarse language, sexual themes and/or other content that some may deem explicit.

In this context of this document, content refers to both spoken and musical content, unless otherwise specified.

### Scope and Context

This policy is broken up into two parts: content which is unacceptable irrespective of context, and content which may be acceptable during selected dayparts and with appropriate context.

Code 2.5 states "In all station activities and our behaviour we will oppose and break down prejudice on the basis of ethnicity, race, language, gender, sexuality, age, physical or mental ability, occupation, religious, cultural or political beliefs".

On this basis, any content that vilifies a person or persons based on their ethnicity, race, language, gender, sexuality, age, physical or mental ability, occupation, religious, cultural or political beliefs is strictly forbidden.

However, content that makes comment on any of the above – either as a 'throwaway line' (e.g. a song lyric) or as a topic in itself, may be acceptable. The reason being is that part of opposing and breaking down prejudice involves evaluation and discussion.

Often, a layer of context may need to be applied to determine whether or not the content fits within Lofty's standards. There are examples later in this document where context and judgement have been applied to rulings.



## Language

These days, there's a lot of profaned music. Much of the time, the swearing has context and the message contained within said music would be diluted if this language was not present. Furthermore, tracks of this nature often convey an important social message.

The expectation is that songs with such language are restricted to shows broadcast after 9pm. However, there are some situations where songs with strong language may be broadcast prior to 9pm. Carefully consider whether it's necessary to play said song during your show if prior to 9pm. Refer to the Programming Subcommittee for further guidance.

Irrespective of when said song is broadcast, the presenter is to give a language warning.

There may be times where songs with profanities are played out automatically. Should this be detected, the song is to be disabled in our playout system, so that it does not play until such time that the track can be modified with a restriction to play after 9pm only being loaded. This remedial action is to be recorded in the Lofty fault log (playout).

## Examples

The following table gives a number of real-life examples of songs containing profanities from both Lofty and other stations, along with how Lofty handled it (either real or hypothetical).

Lofty examples are marked (\*)

Example	Action
(*) The Prodigy – “Smack My Bitch Up”, played during a tribute to the band's lead singer, Keith Flint, who had passed away within 24 hours of this special going to air. Played on a Tuesday afternoon.	<p><b>OK to play.</b> A concern was raised by the program maker, as whilst this song is track 1 on The Prodigy's most famous album (“The Fat Of The Land”), the phrase “smack my bitch up” was a sample from a 1980s hip hop artist, the album was released in 1997 and the song did not have any other lyrics at all, the phrase “smack my bitch up” may be considered as encouraging violence against women.</p> <p>The Programming Subcommittee considered the presenter's concern, and ruled that this track would be OK to play as a once-off based on context, viz.:</p> <ul style="list-style-type: none"><li>- This was the lead track from The Prodigy's most commercially successful album</li><li>- The presenter has flagged his intention to play “The Fat Of The Land” in its entirety as a tribute to Keith Flint, who had passed away just 24 hours earlier</li><li>- Without any other lyrics, the phrase “smack my bitch up” doesn't have any specific connotations relating to violence against women.</li></ul> <p>This track was aired. No complaints were received.</p>

<p>(*) A.B. Original – “January 26”, played during an indigenous music special on the afternoon of January 26.</p>	<p><b>OK to play.</b> As part of Lofty’s indigenous engagement strategy, we play programming that ties into significant events relating to Australia’s First Nations People.</p> <p>On January 26, we feature an afternoon of indigenous music across a range of eras and genres.</p> <p>“January 26” was played as this is a protest song against Australia Day, recorded by A.B. Original.</p> <p>In this track, strong opinions are expressed with some coarse language used to underline the point that the two members of A.B. Original, Briggs and Trials, are unhappy with the status quo in relation to Australia Day and how it is viewed by some members of mainstream Australia.</p> <p>As one of the members of A.B. Original, Trials, is a Ngarrendjeri man, this track has some local significance (Lofty can be heard in parts of Ngarrendjeri country). By playing this track, Lofty is also supporting local music.</p> <p>On this basis, the Programming Subcommittee approved this track being played during the day.</p> <p>Furthermore, this song is occasionally played in Lofty’s rotation after 9pm.</p> <p>No complaints were received.</p>
<p>Charlie Drake – “My Boomerang Won’t Come Back”.</p>	<p><b>Not OK to play.</b> This track was recorded in 1961, by a British entertainer named Charlie Drake. The tone of the song, including but not limited to lyrics and vocal delivery, presents as a Minstrel-style (blackface) performance where Drake imitates an Aboriginal Australian who has misplaced his boomerang.</p> <p>Notwithstanding how distasteful (or not) individual Lofty members may find this track, we believe that the archaic and stereotypical mid-20th century portrayal of First Nations People demonstrated in this song is the type of content that Code 2.5 is designed to address.</p> <p>Whilst Lofty has never played this track – and is extremely unlikely to do so at any point in the future - it was banned by the ABC in 2015 due to concerns about its content.</p>
<p>“Baby, It’s Cold Outside”</p>	<p><b>Refer to the Programming Subcommittee</b></p> <p>First performed in the 1949 film “Neptune’s Daughter”, by Ricardo Montalban and Esther Williams. According to <a href="http://secondhandsongs.com">secondhandsongs.com</a>, this song has been covered no fewer</p>

	<p>than 300 times. This song is now a staple of Christmas music programming on radio worldwide.</p> <p>In 2018, a number of radio stations around the world banned this song over concerns that its lyrical content may imply that the female subject of this song was coerced by the male subject into staying with him overnight. Some commentators believe that the actions specified by the male may count as a prelude to a sexual assault, and this song may normalise such behaviours.</p> <p>Other commentators believe there is more subtle nuance to this track, insofar as the female subject wanting to spend the night with the male subject, but she finds difficult to reconcile her own desires in the context of 1940s society. In other words, the female subject would like to stay with the male subject, but she needs to find an excuse to do so, as the standards of the era were not favourable towards women taking ownership of their own sexuality.</p> <p>This track would need to be referred to the Programming Subcommittee. Interpretation of this track may be subjective, based on both the current composition of the Programming Subcommittee as well as the overall context of playing this track during a presenter's show.</p> <p>"Baby, It's Cold Outside" is not part of Lofty's automated Christmas music programming.</p>
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## POLICY DOCUMENT 4.1.6

<b>Policy Name (full)</b>	Programming > Violence and Brutality
<b>Policy Family</b>	4 – Programming and Music
<b>Version/Date</b>	V1.0 22 February 2019
<b>Maintained By</b>	Programming Subcommittee

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<b>PRECIS</b>	This policy addresses the issues of violence and brutality in the context of Code 3.1.a of the Community Radio Broadcasting Codes of Practice 2008.
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### Introduction

Code 3.1 states the following:

*Our community radio station will not broadcast material that may:*

- a. *incite, encourage, or present for its own sake violence or brutality,*
- b. *mislead or alarm listeners by simulating news or events,*
- c. *present as desirable the use of illegal drugs, the misuse of tobacco or alcohol as well as other harmful substances, and*
- d. *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.*

This policy addresses the highlighted section of Code 3.1.

### Scope and Context

Broadly speaking, there are four key contexts: music, spoken word programming, news reporting and sponsorship.

*Music* is dealt with in its own subsection below.

*Spoken word programming* is relatively straightforward. Lofty shall not broadcast programming that incites, encourages or presents for its own sake violence and brutality.

Any presenter found to be inciting, encouraging or presenting content *for its own sake* violence and/or brutality shall be subject to disciplinary action pursuant to Rule 50 of the Lofty Constitution.

Whilst violent acts are often presented in the context of *news reporting*, it is highly unlikely that said reports would incite, encourage or present violence or brutality for its own sake. Lofty broadcasts news and current affairs content from reputable sources, and it is implied that said reports are lodged by professional journalists, for whom the act of inciting or encouraging violence would most likely be a career-ending move.

*Sponsorship* is addressed in greater detail in the Sponsorship policy series.

### Music

Music is a powerful medium, and has been used by scores of artists to express frustration and anger at many things, including but not limited to people, actions and circumstances. As such, a mature and pragmatic approach is taken to balance Lofty's obligations to the Code in such a way that Lofty's modern and progressive DNA is not compromised.

Context is important, which is why Lofty believe the phrase “for its own sake” is the most important phrase contained within Code 3.1.a.

Where violence or brutality is referenced in a song, it is usually in a wider context. In our opinion, the overarching context of the song’s lyrics needs to be fully understood prior to reviewing the violence and/or brutality expressed in said track. Consider “Janie’s Got A Gun” by Aerosmith. This track tells the story of a young woman who suffered abuse from a family member as a child, with said abuse driving her to shoot her abuser in the head. Whilst the act of shooting someone in the head is an act of violence or brutality, there is a narrative that explains the circumstances leading up to this act, ergo it is not violence or brutality for its own sake.

Tracks containing particularly strong references to violence and/or brutality are subject to the same airplay restrictions as songs containing profanity viz. airplay of said tracks is to be avoided between 05:00-20:59 daily.

Notwithstanding the above, we must be careful not to become hypersensitive to songs or artist names containing words that *may* reference violence or brutality. Banning every song by The Killers and/or The Stranglers, along with “Psycho Killer” by Talking Heads, may appear to a reasonable person as an overreaction to Code 3.1.a.

However, should an audience member deem a song referencing violence or brutality to be in breach of Code 3.1.a, and assuming said audience member is sufficiently motivated into lodging a complaint, said complaint will be carefully considered in terms of Policy Family 6.



## POLICY DOCUMENT 4.1.7

**Policy Name (full)** Programming > Drug, alcohol and tobacco use  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

This policy addresses the issues of drug, alcohol and tobacco use in the context of Code 3.1 of the Community Radio Broadcasting Codes of Practice 2008.

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### Introduction

Code 3.1 states the following:

*Our community radio station will not broadcast material that may:*

- a. *incite, encourage, or present for its own sake violence or brutality,*
- b. *mislead or alarm listeners by simulating news or events,*
- c. *present as desirable the use of illegal drugs, the misuse of tobacco or alcohol as well as other harmful substances, and*
- d. *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.*

Due to the gravitas and complex nature of this type of material, each of these items is covered in its own Policy Document within Policy Family 4 (Programming and Music).

This policy addresses the issues of drug, alcohol and tobacco use and how Lofty addresses these issues.

### Scope and Context

Broadly speaking, there are four key contexts: music, spoken word programming, news reporting and sponsorship.

*Music* is dealt with in its own subsection below, mainly due to the undeniable impact that substance abuse has left on popular music from the mid-20<sup>th</sup> century until today.

*Spoken word programming* is relatively straightforward. Lofty shall not broadcast programming that presents the misuse of drugs, alcohol, tobacco or any similarly harmful substances as desirable pursuits for the audience to consider engaging in.

However, we are also mindful that misuse of substances – either illicit or legal – is a public health issue first and foremost. As such, Lofty shall take great care not to vilify persons that are subject to a substance abuse issue or addiction.

*News reporting* is arguably more straightforward than spoken word programming. The expectation is that news reporting, either via Lofty's inhouse programming resources or sourced via external providers, may report on substance abuse issues in an informative and 'matter of fact' way.

This includes but is not limited to reporting on persons whose alleged or confirmed usage of such substances may have contributed to an incident deemed to be within the public interest, such as the death of a popular musician.

*Sponsorship* is addressed in greater detail in the Sponsorship policy series.

## **Music**

The use (and misuse) of substances has been intertwined with music history since at least the mid-20<sup>th</sup> century. As such, a mature and pragmatic approach is taken to balance Lofty's obligations to the Code in such a way that Lofty's modern and progressive DNA is not compromised.

There are countless songs that reference drug, alcohol or tobacco usage. These references may be literal or metaphorical. To further complicate matters, many singles and/or albums have been recorded whilst the performers have allegedly been affected by drugs or alcohol (for example, it is alleged that at least two Fleetwood Mac albums were recorded whilst the band's members were affected by cocaine).

In short, to ban every single song that references substance abuse and every artist that has ever recorded anything whilst under the influence is an unrealistic expectation of Lofty and its presenters. Furthermore, a reasonable person would not expect Lofty – or any other broadcaster – to undertake a wholesale purge of its music library on this basis.

However, should an audience member deem a song referencing substances to be in breach of Code 3.1, and assuming said audience member is sufficiently motivated into lodging a complaint, said complaint will be carefully considered in terms of Policy Family 6.



## POLICY DOCUMENT 4.1.8

<b>Policy Name (full)</b>	Programming > Simulation of news and events
<b>Policy Family</b>	4 – Programming
<b>Version/Date</b>	V1.0 22 February 2019
<b>Maintained By</b>	Programming Subcommittee

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### PRECIS

This policy addresses the concerns surrounding simulated news or events in the context of Code 3.1.b of the Community Radio Broadcasting Codes of Practice 2008.

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### Introduction

Code 3.1 states the following:

*Our community radio station will not broadcast material that may:*

- a. *incite, encourage, or present for its own sake violence or brutality,*
- b. ***mislead or alarm listeners by simulating news or events,***
- c. *present as desirable the use of illegal drugs, the misuse of tobacco or alcohol as well as other harmful substances, and*
- d. *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.*

This policy addresses the issues surrounding the potential to mislead or alarm listeners by simulating news or events.

### Scope and Context

The scope and context of this policy relates to spoken word programming.

On face value, it would appear that the Code forbids satirical news and current affairs content. We believe this is not the case, so long as said content is clearly defined as satire. The simplest way to do this is to place a disclaimer at the beginning and the end of said satirical program.

This Code would also appear to forbid the broadcast of radio plays or other content which is presented as real live event; one suspects this particular provision is in response to the premiere of *The War Of The Worlds* on radio in 1938. In this instance, a disclaimer would to be broadcast at the beginning and the end of said simulated news and/or event, with further disclaimers to be made during natural program breaks should said presentation run for longer than 30 minutes.

Under no circumstances shall Lofty misrepresent themselves as broadcasting a live event or outside broadcast, as this is a clear breach of the Code.





## POLICY DOCUMENT 4.1.9

**Policy Name (full)** Programming > Indigenous  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

### PRECIS

Code 4 of the Community Radio Broadcasting Codes of Practice 2008 acknowledges the status of Australia's Indigenous peoples, being Aboriginal and Torres Strait Islander peoples. This code also sets a framework to engage with Indigenous communities in a culturally sensitive and respectful manner.

This policy sets out how Lofty meets the requirements set out in the code, along with additional policies designed to promote, encourage and show solidarity with Australia's First Nations Peoples.

### Introduction

*Lofty operates on Peramangk country. We acknowledge the Peramangk people as the traditional custodians of the Adelaide Hills region where we live, learn and work. We pay our respects to Peramangk Elders, past and present. Always was, always will be Peramangk country.*

### Scope and Context

Whilst this policy lives in the Programming & Music policy family, this policy is a linchpin in Lofty's overall Indigenous community engagement strategy.

### Comparison of the Code vs Lofty Policy

The Code	Lofty Policy
<p>We will seek to involve and take advice from Indigenous Australians in the production of programs focusing on Indigenous Australians and issues.</p> <p>Where possible, we will consult the appropriate Indigenous media organisation broadcaster on appropriate forms of communication.</p>	<p>As part of ongoing development of its Indigenous community engagement policy, Lofty seeks to take advice from Indigenous media organisations across Australia.</p> <p>Whilst we are aware that each local group and each country have unique differences, Lofty understands that there are people within the Indigenous broadcasting sector with knowledge spanning a broad range of Australia's First Nations.</p>
<p>When reporting on Indigenous peoples and issues, we will take care to verify and observe the best way to respect culture and customs by:</p> <ol style="list-style-type: none"><li>1. considering regional differences, that is, be mindful of differences between Indigenous local groups;</li></ol>	<p>Lofty actively seeks to collaborate with the Indigenous peoples of the Peramangk nation, being the location of Lofty's studios and the service area of Lofty's FM broadcasts.</p> <p>Where appropriate, Lofty shall also engage with the Indigenous peoples of the Kurna and Ngarrindjeri nations, as Lofty's FM signal is subject to fortuitous coverages in parts of these nations.</p>

<p>2. using appropriate words and phrases in referring to Indigenous peoples and their regional groups;</p>	<p>Lofty shall endeavour to make all presenters aware of culturally appropriate and respectful ways to make reference to Indigenous peoples and their regional groups.</p> <p>Said awareness is to be driven through a number of initiatives, including but not limited to:</p> <ul style="list-style-type: none"> <li>- Indigenous cultural awareness training facilitated by suitably qualified organisations, where said training may provide an overview of cultural differences shared by many of Australia's Indigenous peoples</li> <li>- Localised cultural awareness training developed in consultation with people of the Peramangk nation, along with peoples of the Kaurna and Ngarrindjeri nations where appropriate</li> </ul>
<p>3. seeking proper advice on how to best respect Indigenous bereavement customs when reporting on people who are recently deceased;</p>	<p>Advice on referring to a recently deceased Indigenous person is to be sought prior to reporting on their passing.</p> <p>In the event where the passing is of a high profile Indigenous Australian, and Lofty has been unable to obtain direct advice on how to refer to the deceased, Lofty shall consult the NITV website (<a href="http://sbs.com.au/nitv">sbs.com.au/nitv</a>) and observe how NITV refers to the deceased.</p>
<p>4. using suitable words and phrases when reporting on the social and emotional well-being of Indigenous people.</p>	<p>Lofty shall endeavour to make all presenters aware of culturally appropriate and respectful ways to make reference to Indigenous peoples and their regional groups.</p> <p>Said awareness is to be driven through a number of initiatives, including but not limited to:</p> <ul style="list-style-type: none"> <li>- Indigenous cultural awareness training facilitated by suitably qualified organisations, where said training may provide an overview of cultural differences shared by many of Australia's Indigenous peoples</li> <li>- Localised cultural awareness training developed in consultation with people of the Peramangk nation, along with peoples of the Kaurna and Ngarrindjeri nations where appropriate.</li> </ul>



## POLICY DOCUMENT 4.1.10

**Policy Name (full)** Programming > Suicide and mental health issues  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

This policy addresses the issues of suicide and mental health issues use in the context of Code 3.1.d of the Community Radio Broadcasting Codes of Practice 2008.

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### Introduction

Code 3.1 states the following:

*Our community radio station will not broadcast material that may:*

- a. *incite, encourage, or present for its own sake violence or brutality,*
- b. *mislead or alarm listeners by simulating news or events,*
- c. *present as desirable the use of illegal drugs, the misuse of tobacco or alcohol as well as other harmful substances, and*
- d. *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.*

Due to the gravitas and complex nature of this type of material, each of these items is covered in its own Policy Document within Policy Family 4 (Programming and Music).

This policy addresses the highlighted section of Code 3.1.

### Scope and Context

Broadly speaking, there are three key contexts to consider in relation to Code 3.1.d: music, spoken word programming and, news reporting.

*Music* is dealt with in its own subsection below, mainly due to the undeniable impact that suicide and mental illness has left on popular music from the mid-20<sup>th</sup> century until today. As well as music that addresses these issues directly (using either literal or metaphorical lyrics), there is also music that contains words that may be connected to mental illness, even if the song itself is not.

For *spoken word programming*, it may be appropriate to consider suicide and mental illness as two separate issues, despite the obvious overlap.

In Lofty's context, suicide reporting is usually limited to high profile cases such as those involving musicians. This may take the form of narrative during a tribute show to said artist, or in the form of a long form discussion about suicide more generally.

Under no circumstances shall the presenter discuss details of location and/or method.

If discussing suicide with a guest, particularly where the guest may be seeking to raise awareness of suicide prevention as the result of being directly affected by the suicide of a friend or family member, there is a possibility that a guest may choose to mention either the location and/or the method. Should this occur, the presenter is to immediately refocus the guest away from this

discussion and onto another aspect of the suicide, such as how the guest felt when they first became aware of said suicide.

The opportunity should be taken to broadcast a call to action to members of the audience who may be at risk of suicide to seek assistance. A call to action may sound similar to this:

*If you feel you may be at risk of suicide, please call Lifeline on 13 11 44, Kids Helpline on 1800 55 1800 or the Suicide Call Back Service on 1300 659 467. Assistance can also be found at [beyondblue.org.au](http://beyondblue.org.au) and [blackdoginstitute.org.au](http://blackdoginstitute.org.au).*

Lofty actively encourages respectful on-air discussions about mental illness, as we can play a valuable role in advancing public awareness into the impact of mental illness on our community. These discussions aim to prompt audience members to start their own discussions with friends, family and medical professionals.

*News reporting* is arguably more straightforward than spoken word programming. The expectation is that news reporting, either via Lofty's inhouse programming resources or sourced via external providers, may report on suicides or mental health issues in an informative and 'matter of fact' way.

As Lofty sources news and current affairs reporting from reputable sources, the expectation is that professional journalists are already aware of how to report suicide in an appropriate and responsible manner.

## **Music**

Music is a very powerful artform, and has been used by many artists as a way to express their feelings, including but not limited to observations on the mental health of themselves and others, as well as suicide. As such, a mature and pragmatic approach is taken to balance Lofty's obligations to the Code in such a way that Lofty's modern and progressive DNA is not compromised.

These subjects are still difficult for the community to explore and discuss in an open and frank manner. This is why it is important that Lofty does not shy away from playing music that tells stories about the battles that some have faced. Lyrics in such songs may either be literal or metaphorical.

Any songs that are pro-suicide, or treat suicide and/or mental illness in an unreasonably lighthearted manner, are not permitted for airplay.

Notwithstanding the above, we must be careful not to become hypersensitive to songs or artist names containing words that *may* reference mental illness or suicide. If we did that, then every song with the word "crazy" in it would need to be banned, along with "Suicide Blonde" by INXS. Furthermore, we'd need to ban music by artists such as The Crazy World of Arthur Brown and Crazy P.

However, should an audience member deem a song referencing suicide or mental illness to be in breach of Code 3.1, and assuming said audience member is sufficiently motivated into lodging a complaint, said complaint will be carefully considered in terms of Policy Family 6.



## POLICY DOCUMENT 4.2.1[a]

<b>Policy Name (full)</b>	Policy – Community Needs and the Act
<b>Policy Family</b>	4 – Programming
<b>Version/Date</b>	V1.0 1 October 2019
<b>Maintained By</b>	Programming Subcommittee

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<b>PRECIS</b>	Lofty's interpretation of the phrase "community needs" as set in section 84(2) of the Broadcasting Services Act 1992 (Cth).
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### Introduction

As the name suggests, community radio's *raison d'être* is to provide a broadcasting service to the community. This requirement is legislated in section 84(2) of the Broadcasting Services Act 1992 (Cth) ["the Act"], with ACMA providing an interpretation of the phrase "community needs" as part of the Community Broadcasting Participation Guidelines 2010 [the Guidelines].

This policy explains how Lofty interprets the phrase *community needs* in terms of both the Act. Details of Lofty's approach to meeting community needs commensurate with the Guidelines is documented in Policy 4.2.1[b].

### The Act

Section 84(2) states:

*In deciding whether to allocate a community broadcasting licence that is a broadcasting services bands licence to an applicant or to one of a group of applicants, the ACMA is to have regard to:*

- (a) the extent to which the proposed service or services would meet the existing and perceived future needs of the community within the licence area of the proposed licence; and*
- (b) the nature and diversity of the interests of that community; and [...]*
- (c) the nature and diversity of other broadcasting services (including national broadcasting services) available within that licence area [...]*

In simple terms, Lofty's programming (referred to in the Act as "material") is designed to *complement and supplement* that which is available via other broadcasters within Mount Barker RA1. Lofty uses a number of mechanisms to establish whether current or proposed material meets community needs. Said mechanisms are detailed in policy 4.2.1[b].

### To complement and supplement

Section 84(2)(c) suggests that as part of the community broadcasting licence application process, ACMA is to have regard for the nature and diversity of other services within Mount Barker RA1.

In order to do this, Lofty needs to consider which broadcasters currently provide a service within Mount Barker RA1. Firstly, consideration needs to be given to the nature of each broadcaster's programming. Secondly, consideration needs to be given as to the points of difference between Lofty's programming and that of other broadcasters.

## **Existing and proposed broadcasting services in Mount Barker RA1**

Overlapping radio and television services	Category of broadcasting service	Nature of programming
<b>Radio services</b>		
5ABCFM 103.9 MHz	National	ABC classic FM—classical music
5ABCRN 729 kHz	National	ABC Radio National – general programming with a local and national perspective including news, information and entertainment
5AN ABC Adelaide 891 kHz	National	ABC Local Radio (Adelaide) - general programming with a local perspective including news, information and entertainment
5JJJ 105.5 MHz	National	Triple J—Youth contemporary music and programming
5PB <sup>1</sup> 972 kHz	National	ABC News—news programming
5SBSFM 106.3 MHz	National	Multilingual programming including news, education and entertainment
5EZY <sup>2</sup> 100.3 MHz	Commercial	General programming including news, information and entertainment
5MU 94.3 kHz	Commercial	General programming including news, information and entertainment
5LCM <sup>3</sup> 88.9 MHz	Community	Representing the general community interest

### **Points of difference**

It is clear that – on paper – there is a degree of overlap between several national broadcasters, as well as the local commercial broadcasters. In practice, each broadcaster has their own programming goals, along with their own policies and procedures to enable their respective goals to be met.

Lofty's *raison d'être* is to provide a service that is progressive and diverse, meeting its brief via community engagement and filling niches that other broadcasters are not able to fill. As such, Lofty's programming policies in general – and music policies in particular – are designed to provide clear demarcation between Lofty's sound and that of our fellow Mount Barker RA1 broadcasters.

### **How to differentiate**

When assessing a program's compatibility with Lofty, we start with one question:

*Is there any other broadcaster in Mount Barker RA1 airing similar programming?*

If the answer is “no”, then this program deemed to be *different* to other material airing in Mount Barker RA1. If the answer is “yes”, “maybe”, “sorta” or “a bit”, similarities and differences need assessment.

<sup>1</sup> On-air identity is ABC News Radio.

<sup>2</sup> On-air identity is Power FM.

<sup>3</sup> On-air identity is Lofty 88.9

“Is any other broadcaster [...] airing similar programming”	Lofty’s response and next actions
<p>“No”</p>	<p>The proposed material is <b>different</b> to anything else currently on air in Mount Barker RA1.</p> <p>Whilst not a guarantee that said proposal will be added to Lofty’s programming schedule, programming of a <b>different</b> nature has a clear advantage over that which overlaps that of other broadcasters.</p> <p>Details of the differences are to be confirmed and documented as per usual programming proposal and assessment procedures.</p>
<p>“Maybe”</p> <p>“a bit”</p> <p>“kinda”</p> <p>“sorta”</p> <p>“yeah nah”</p> <p>etc.</p>	<p>Further assessment is required to establish if the proposed material <b>complements and supplements</b> other available programming.</p> <p>Many programs that display similar characteristics of those on air elsewhere in Mount Barker RA1 may <b>complement and supplement</b> said programming.</p> <p>As an example, Lofty’s current weekly schedule includes several science programs. ABC RN also airs science programming, however Lofty’s science programming <b>complements and supplements</b> ABC RN’s output by avoiding scheduling conflicts.</p> <p>Another factor is how the subject matter is framed. Consider the following science programs:</p> <ul style="list-style-type: none"> <li>• “Diffusion”, a science program that explores the relationships between science, culture, politics and the arts.</li> <li>• “Lost in Science”, a science program that provides a platform for scientists to geek out on their particular scientific interest or discipline.</li> <li>• “Spectrum”, DW’s flagship science program. Whilst there may be similarities to ABC RN’s Science Show, DW’s global footprint allows them to focus on stories that may fall outside of ABC RN’s wheelhouse, thus creating a source of differentiation.</li> </ul>
<p>“Yes”</p> <p>“pretty much”</p> <p>“exactly the same”</p> <p>etc.</p>	<p>At best, this material may be <b>similar</b> to other programming available in Mount Barker RA1.</p> <p>The Programming Subcommittee shall work with the Proposer of <b>similar</b> material in an attempt to assist the Proposer to create as much differentiation as possible, therefore allowing said program to <b>complement and supplement</b> other available content.</p> <p>Should the Programming Subcommittee and the Proposer fail to reach consensus on the differentiation of the proposed material, the Programming Subcommittee is to decline the proposal.</p> <p>Where a proposal is declined, justification is to be documented by the Programming Subcommittee should the Proposer seek a review of said decision.</p> <p>The Proposer shall not be discouraged or excluded from submitting future programming proposals.</p>





## POLICY DOCUMENT 4.2.1[b]

**Policy Name (full)** Policy – Community Needs and the Guidelines  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 22 February 2019  
**Maintained By** Programming Subcommittee

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**PRECIS** Lofty's interpretation of the phrase "community needs" as set in the Community Broadcasting Participation Guidelines 2010.

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### Introduction

As the name suggests, community radio's *raison d'être* is to provide a broadcasting service to the community. This requirement is legislated in section 84(2) of the Broadcasting Services Act 1992 (Cth) ["the Act"].

This policy explains how Lofty interprets the phrase *community needs* in terms of section 7 of the Community Broadcasting Participation Guidelines 2010 ["the Guidelines"].

### The Guidelines and how they are applied to identifying community needs

Section 7 of the Guidelines provides detailed information on how a community broadcaster may identify community needs for the purposes of providing a community broadcasting service.

#### 7.2 HOW CAN LICENSEES IDENTIFY COMMUNITY NEEDS?

There are a number of methods suggested by the Guidelines.

Guidelines method	Application of method by Lofty
Surveys, questionnaires and online polling	Lofty uses data compiled via the CBAA/McNair yellowSquares National Listener Survey. Lofty expects to commission its own surveys in the future.
Suggestion boxes	A physical suggestion box is located at Lofty's studio.
Focus groups	Lofty expects to run focus groups in the future.
Audience and community feedback through letters, electronic communications (SMS or email, for example) and a station website; Audience requests	Lofty encourages feedback from the community, and has received feedback via phone, email, instant messaging and via the contact form at <a href="http://lofty.org.au">lofty.org.au</a> . Lofty expects to adopt additional mechanisms to facilitate audience and community feedback as said mechanisms become available.
Discussions with community groups and representatives	Lofty has sound working relationships with a number of community and sporting groups, as well as with Local Government.
Analysing census data for the licence area	Lofty uses the free version of the Census TableBuilder service provided by the ABS. This has enabled Lofty to build a customized geographical profile based on census data pertaining only to Mount Barker RA1.

In addition to outlining methods in which the community can express needs, Guideline 7.2 also defines factors for consideration during the needs identification process.



<b>Guidelines factor</b>	<b>Consideration of factor by Lofty</b>
(To) canvas the needs and expectations of people in the community within their licence areas, not just their audiences or members and volunteers who are already actively involved with the station	Lofty has created a position on its Programming Subcommittee for a non-member Community Representative. A Community Representative is selected by Lofty and serves for a fixed term as set out in Policy 1.2.4. Lofty regularly canvases feedback directly from listeners via on-air promotions and social media posts. Our website (lofty.org.au) features an online feedback form.
(To) encourage suggestions for improvements to their service	Lofty airs CBAA Code Announcements several times a day; a much higher frequency than the minimum stipulated in the Code. When a specific community need has been identified but is yet to be confirmed, Lofty may air specific announcements targeting community feedback on said need. Lofty also solicits feedback via target social media advertising campaigns (viz. Facebook) from time to time.
(To) design questions to elicit full and honest responses	When designing a bespoke survey, Lofty keeps closed questions to a minimum. Semi-open questions (answerable via multiple choice questions with an option to elaborate on the option(s) selected via a free-form text box) and open questions (answerable via a free-form text box) allow Lofty to create surveys that encourage full and open responses with baked-in simplicity to the benefit of both the respondent and Lofty.
(To) identify whether respondents reside in the licence area or have some other connection to the licence area (for example, work or study in the licence area).	Lofty identifies respondents to surveys via postcode. Whilst we encourage respondents to give their postcode, we respect the respondent's privacy and therefore postcode is an optional question. Where a disclosed postcode falls outside of Mount Barker RA1, Lofty asks follow-up questions insofar as the respondent's connection to the licence area.
Discussions with community groups and representatives	Lofty has sound working relationships with a number of community and sporting groups, as well as with Local Government.
Analysing census data for the licence area	Lofty uses the free version of the Census TableBuilder service provided by the ABS. This has enabled Lofty to build a customized geographical profile based on census data pertaining only to Mount Barker RA1.

## *Empirical methods*

Whilst the Guidelines set minimum standards relating to methodology for establishing community needs, Lofty may also employ a number of empirical methods to establish or confirm an identified community need.

One empirical method used to great effect during Lofty's online and temporary community broadcasting licence (TCBL) phases was the use of syndicated specialist music programming. This allowed Lofty to experiment with and simulate a wider variety of specialist music genres than otherwise possible during our startup phase.

As of writing, this method has led to the creation of at least one program of local significance. Several additional community needs have been identified due to positive audience feedback relating to other syndicated specialist music programming, with work underway to develop locally produced equivalents.

Case studies of how syndication has uncovered latent community needs are given in Appendices C and D of Policy 4.2.3.

### **7.3 ACHIEVING A DIVERSE AND REPRESENTATIVE PROGRAM SCHEDULE**

Guideline 7.3 states "Licensees can often demonstrate a commitment to representing their community interest by broadcasting a range of programming that caters for the community's needs".

In order to achieve a diverse and representative program schedule, Guideline 7.3 documents the following diversity factors:

<b>Diversity factor</b>	<b>Consideration of factor by Lofty</b>
understand the profile of the community they are licensed to serve, for example, the linguistic diversity of a geographically-based community interest	Lofty updates its analysis of census data once newly released data is made available. This generally occurs around 12-18 months after a census is held. At the time of writing, the most recent data relates to the 2016 Census, thus being a trailing indicator.  Lofty maintains a sound relationship with the Community Engagement team at Mount Barker District Council, as they are in a better position to provide a leading indicator of emerging linguistic diversity trends in Mount Barker RA1.
identify and review their community interest's programming preferences on a regular basis	Programming is regularly reviewed to ensure it remains aligned with community needs as part of the Programming Subcommittee's standard operating rhythm.
have clear policies and procedures for deciding the type and mix of programs	Policies and procedures are regularly reviewed by the Programming Subcommittee.
foster ties with relevant community groups and encourage their input into the program schedule	Lofty has a culture of instilling a sense of ownership within each of its members. This has led to our member base become some of Lofty's strongest advocates.  Many Lofty members are also members of other community groups; thus opening up many great opportunities to develop authentic relationships with said groups.

### ***Recording and reviewing how our programming meets community needs***

As part of the program approval process, the Programming Subcommittee records their assessment on how community needs were determined.

Each program is subject to regular review by the Programming Subcommittee to ensure that said programming still meets its intended community needs, or may have led to other hitherto latent community needs being uncovered and fulfilled. Where changes have been made to a program based on shifting community needs, said changes are to be documents as part of the review process.

Both the initial assessment and reviews of each program are held in a central repository from which reports may be generated. Said reports may be used for compliance purposes (viz. as part of a licence renewal application or when otherwise requested by ACMA), as well as general internal or external reporting purposes.

Whilst not strictly necessary, Lofty's intention is to retain all programming proposals along with their community needs assessments and subsequent reviews in perpetuity. The rationale is that Lofty expects is expect to become a valuable cultural and community asset, therefore it behooves Lofty to retain records with expected future heritage value. This will allow Lofty's heritage to be observed and celebrated by future generations of Lofty members and volunteers, as well as the local community as a whole.



## POLICY DOCUMENT 4.2.2

**Policy Name (full)** Policy – Local significance  
**Policy Family** 4 – Programming  
**Version/Date** V1.0 1 November 2019  
**Maintained By** Programming Subcommittee

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### PRECIS

Lofty's interpretation of the phrase "local significance" in the context of section 84 of the Broadcasting Services Act 1992 (Cth).

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### Introduction

On 6 December 2017, the Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017 ["the Bill"] was introduced to the Senate and read for the first time. Subsequently, the Bill was passed by both the Senate and the House of Representatives on 22 August 2018, with the Bill assenting as Act 95 in the 2018 Parliamentary year.

The assent of the Bill led to a number of amendments to the Broadcasting Services Act 1992 (Cth) ["the Act"]. This policy confirms Lofty's interpretation of amendments to section 84 of the Act and sets a framework around how Lofty applies said interpretation when making programming decisions.

### Scope and Context

Section 84 of the Act governs the allocation of community broadcasting licences. Paragraph (2) of section 84 states:

- (2) *In deciding whether to allocate a community broadcasting licence that is a broadcasting services bands licence to an applicant or to one of a group of applicants, the ACMA is to have regard to [...]*
  - (b) *the nature and diversity of the interests of that community; and*
  - (ba) *in the case of a community radio broadcasting licence—the extent to which the proposed service or services would provide material of local significance [...]*
- (3) *For the purposes of paragraph (2)(ba), material is of **local significance** if:*
  - (a) *it is hosted in the licence area of the proposed licence; or*
  - (b) *it is produced in the licence area of the proposed licence; or*
  - (c) *it relates to the licence area of the proposed licence.*

### Defining "local significance"

Irrespective of content, programming (being the material to which the Act refers) generated by Lofty is deemed to be of *local significance*. This includes but is not limited to automated playout programming consisting of non-syndicated programming materials curated by Lofty's Programming Subcommittee.

### ***Establishing local significance in syndicated programming***

Programming produced outside the licence area is referred to as *syndicated* programming (refer Policy 4.2.3). Syndicated programming scheduled by Lofty prior to 1 November 2019 (viz. release date of V1.0 of this policy) is classified as *legacy* programming.

For the purposes of this policy, Lofty has taken the following wording from the Explanatory Memorandum, Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017 (Cth). As this memorandum was presented to every Member in each House, a reasonable person may infer that the memorandum's content was taken into consideration in passing the Bill.

Consider Item 2 of Schedule 2, page 45 of the memorandum. Lofty's interpretation of the impact on sections 84(2)(ba) and 84(3) on syndicated programming is **emphasised** as thus:

*Item 2 would insert a new subsection 84(3) to provide that, **for the purposes of paragraph 84(2)(ba), material would be of 'local significance' if it is hosted in; or produced in; or relates to, the licence area of the proposed licence.***

*The meaning of 'relates to' the licence area is not defined, in order to provide the ACMA with flexibility to adapt it over time as appropriate in the community radio context. Material could relate to the licence area if, for example, it relates to a person, community organisation or event in the licence area.*

***Material could also relate to the licence area if it relates to a social, economic, political or cultural issue as it affects the licence area (either in the sense of the geographic area or a community within the licence area).***

### ***Issues of local significance***

All legacy syndicated programming has been assessed pursuant to this policy, with local significance added as an assessment criterion to Policy 4.2.3 in V1.1, viz.

<b>Criterion</b>	<b>Desirable</b>	<b>Neutral</b>	<b>Undesirable</b>
<i>Local significance</i>	Addresses two or more of these issues: <ul style="list-style-type: none"><li>- social</li><li>- economic</li><li>- political</li><li>- cultural</li></ul>	Addresses one of these issues: <ul style="list-style-type: none"><li>- social</li><li>- economic</li><li>- political</li><li>- cultural</li></ul>	Does not address any local issues.

Legacy syndicated programming with a local significance rating of *neutral* or *desirable* is to be adopted as permanent programming by Lofty (notwithstanding any future programming decisions by the Programming Subcommittee to retire said programming).

Where the local significance criterion leads to a rating of *undesirable*, said legacy syndicated programming shall be subject to further assessment to ascertain if a community need is met in terms of Policies 4.2.1[a] and [b].



## POLICY DOCUMENT 4.2.3

<b>Policy Name (full)</b>	Radio Programming - Syndication
<b>Policy Family</b>	4 – Programming
<b>Version/Date</b>	V1.1 1 November 2019
<b>Maintained By</b>	Programming Subcommittee

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<b>PRECIS</b>	This policy sets parameters relating to the use of syndicated material to broadcast issues of local significance and/or community need; along with protocols relating to Lofty offering its locally produced programming to other not-for-profit/community broadcasters for rebroadcast.
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<b>SCOPE</b>	Radio broadcasting, radio streaming.
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### Introduction

In order to fill gaps in programming due to issues such as presenter shortages or other resourcing limitations, many community broadcasters turn to programming distributed via syndication.

A radio program is said to be syndicated when it is broadcast at two or more radio stations on a regular basis. Said program may either be live (or have been broadcast live with a recording being offered for syndication), or it could be recorded somewhere other than a radio studio.

Given community radio's role as a locally based medium designed to complement and supplement existing services within a given licence area, excessive reliance on syndicated content may be detrimental to both the audience and the broadcaster.

That said, syndicated content may be beneficial where there is demand for specific content, but said content requires significant resources to produce. The most obvious example is news and current affairs: even a simple 2-minute news bulletin at the top of each hour requires resources beyond the reach of all but the largest metropolitan community radio stations.

An argument can also be made to suggest that quality syndicated content may have greater local relevance than a simple automated music playlist; indeed, this is the whole premise behind the Community Radio Network (CRN).

### Purpose

This policy is intended to ensure that Lofty:

- remains open to opportunities to better serve our local audience through strategic use of syndicated content;
- has a clear understanding that live programming and/or content produced in-house is Lofty's top programming priority, viz. *local content is always given priority and syndication is not to be used as a substitute where locally produced programming is available*;
- conducts a full assessment of proposed syndicated content before adopting it as part of Lofty's program mix, weighted towards material of *local significance* and *community need*;
- proactively seeks opportunities to replace legacy syndicated content with locally produced/presented content where opportunities arise; and
- has robust parameters against which to measure the value of running syndicated content in lieu of locally generated automatic playlist; as well as
- allowing for the exploration of Lofty's locally produced content to be syndicated to other community or not-for-profit radio stations where appropriate.

## General Policy

Lofty shall assess and choose syndicated content based using the Syndication Assessment Matrix, as shown in Appendix A. The matrix is a tool for use by the Programming Subcommittee to determine a proposed syndicated program's suitability for broadcast on Lofty and includes a scoring system designed to assist – but not replace – the Programming Subcommittee's decision process.

The maximum possible score achievable on the matrix is 90 points for *specialist* music programming (as defined in Policy 4.1.1) and 100 points for news, talk and magazine-style programming. The raw score is used; this is deliberate as it places greater weight on non-music programming that is more likely to address issues of local significance.

The matrix is weighted heavily towards material of community need (maximum 20 points) and of local significance (maximum 30 points). Please refer to Policies 4.2.1 and 4.2.2 respectively for more information.

There are several case studies where syndicated programs currently on Lofty have been assessed pursuant to the matrix; said case studies are shown as Appendices B, C and D.

Where a producer/presenter based in the Mount Barker RA1 licence area indicated a preference for their show to air when syndicated content *without established local significance* is currently scheduled, said syndicated content shall be moved to a non-prime timeslot.

Lofty shall not broadcast syndicated generalist music programming, as defined in Policy 4.1.1.

In addition to the above criteria, the Programming Subcommittee may consider other factors that may enhance or detract from a syndicated program's desirability.

## Syndication as a research tool

Historically, Lofty has used syndication to experiment with material the Programming Subcommittee believes will complement and supplement other broadcasters within Mount Barker RA1.

This has proven to be a useful empirical research tool for Lofty to establish community needs, as it has confirmed the community's need for many genres of music that are unavailable on other stations within the Murray Bridge LAP in general, and Mount Barker RA1 in particular.

In addition, we have discovered news/talk and magazine-style syndicated material that not only meets a community need, but is also of local significance.

Where syndicated programming establishes a community need but is not of local significance, Lofty's goal is to convert the need into material of local significance as soon as practicable. This is done by using syndicated programming as encouragement to potential new local presenters/producers that are considering starting their own program within the same genre of the syndicated program in question.

Some highly specialised music content, most notably EDM, may be very difficult to convert to material of local significance despite a community need being met; often due to the immense skills and knowledge of the DJs that produce such programming.

In order to service a need without compromising Lofty's obligation to need to maximise material of local significance during prime dayparts, syndicated programming that meets community need but not local significance shall only be aired where programming of local significance (automated playlist notwithstanding) is unlikely to be sourced.

## **Syndicated material of local significance**

Due to the immense resources required to produce certain types of material, Lofty uses syndication to meet local demands.

Examples of resource-intensive content includes news, current affairs, environmental programming (climate change and sustainability specifically, along with the environment in general), science and LGBTIQ news.

Lofty notes that many community broadcasters around Australia find such content meets local significance requirements.

## **Placeholders**

Where a syndicated program has been scheduled as a placeholder, Lofty is to actively seek a local presenter/producer to broadcast a show featuring comparable material. Said presenter/producer may be sought via general member recruitment activities, targeted member recruitment activities (e.g. announcements calling for a specific type of presenter aired before, during and after said placeholder) or via the existing Lofty member cohort.

Once a suitable local presenter/producer has been found, the placeholder is to be retired. Appendix B shows a case study where this has occurred.

In the event that there is local audience/community demand for the retired placeholder show to be reinstated, the Programming Subcommittee *may* consider rescheduling this show during a non-prime timeslot.

The use of syndicated programming as a placeholder is to be phased out as Lofty's pool of local presenters/producers increases.

## **Prime vs non-prime timeslots**

Put simply, a timeslot that can be readily filled by a local presenter/producer is a prime timeslot. As timeslot demands can be somewhat more fluid than a policy document, prime timeslots are indicated on the current programming guide grid. The Programming Subcommittee may amend the list of prime timeslots without notice.



### **Lofty programming syndicated to other stations**

Lofty encourages its presenters/producers to pursue appropriate syndication opportunities. When doing so, presenters/producers are to engage either the Programming Coordinator or the Programming Subcommittee to ensure that the appropriate protocols are adhered to, as documented from time to time.

The Programming Coordinator and/or Programming Subcommittee may also introduce the presenter/producer to various tools and platforms currently in use by other presenters/producers, as well as helping to identify the most effective syndication platforms based on the program's format and content.

The presenter/producer shall be responsible for preparing recordings of their show for syndication. In its simplest form, this means the presenter/producer will need to take a copy of their show off the logger, edit out sponsorship announcements and station IDs (both live and cart based), re-encode their show (MP3 320kbps commensurate with Lofty's technical standards), and arrange their own distribution.

The presenter/producer may access Lofty resources, including equipment and internet connectivity, for the purpose of preparing and distributing their show for syndication, subject to availability.

Under no circumstances shall a producer/presenter charge a fee for syndication where Lofty's facilities were used to create, record, edit and/or broadcast said show.

## APPENDIX A – Syndication Assessment Matrix

Criterion	Desirable (points)	Neutral (points)	Undesirable (points)
<i>Origin</i> (maximum 5 points)	South Australian (5) Australian (4)	Overseas (3)	Not assessed
<i>Barrier to entry</i> (maximum 10 points)	Very High (10) High (7)	Medium-High (6) Medium (5) Medium-Low (4)	Low (2) Very Low (1)
	Consider how difficult it would be for Lofty to produce its own in-house equivalent.		
<i>Overall quality</i> (maximum 5 points)	Very High (5) High (4)	Medium (3)	Low (2) Very Low (1)
	Measured in terms of quality of content i.e. research, production values, source material, as well as technical quality e.g. MP3 bitrate, distribution technology used.		
<i>Local significance</i> (7.5 points for each issue addressed; maximum 30 points) To be assessed in terms of Policy 4.2.2.	Addresses two or more of these issues: - social - economic - political - cultural	Addresses one of these issues: - social - economic - political - cultural	Does not address any issues of local significance
<i>Compatibility</i> (maximum 10 points) Scored at Programming Subcommittee discretion; ranges given to accommodate for actual scored determined via assessment.	High (10) Complements Lofty's existing programming or is an equal or superior replacement to other syndicated programming; readily demonstrable community need <u>and</u> local significance.	Medium (5) Style/content not currently part of Lofty programming; may appeal to new audience; unproven on Lofty, but may fill a community need and/or be of local significance.	Low (0) Not locally significant or Lofty already has locally significant material in the genre; content falls outside of Lofty policy and/or Constitution; un compelling content; poor overall fit.
<i>Community needs</i> (maximum 20 points) Scored at Programming Subcommittee discretion; ranges given to accommodate for actual scored determined via assessment. To be assessed in terms of Policy 4.2.1.	Current or future need clearly identified; researched and/or documented, either fully or in part. Refer Policy 4.2.1. No overlap with other services within licence area.	Current or future need clearly identified but not yet researched or documented in terms of Policy 4.2.1. Complements and supplements other services within licence area.	Current or future need not clearly identified, researched and/or documented. Significant overlap with other services within licence area.
<i>Cost</i> (maximum 10 points)	Free (10) ≥ 100% sponsored	Paid feed e.g. CRN (5) Low-moderate cost ≥ 50% sponsored	High Cost (0) ≤ 50% sponsored
<i>News &amp; Talk</i> (maximum 10 points) Scored at Programming Subcommittee discretion. To be assessed in terms of all Programming Policies; specifically, 4.1.3 and 4.1.4. MUSIC PROGRAMMING IS NOT SUBJECT TO THIS ASSESSMENT CRITERION.	Socially progressive. Non-partisan. Large, well known reputable source. Aligns with Lofty's culture and ethos.	Socially neutral. Non-partisan. Small-medium reputable source. Indifferent to Lofty's culture and ethos or may challenge Lofty's culture and ethos <i>in a respectful manner</i> .	Socially regressive. Partisan. Dubious source Hostile to Lofty's culture and ethos.

## APPENDIX B: Case study 1 - Living Planet

Living Planet is a weekly 30-minute program produced by Deutsche Welle (DW), Germany's national broadcaster. Scheduled as part of Lofty's Sustainability Sunday programming block; an established block of programming focused on environmental issues.

DW's programming compares favourably to other highly regarded national broadcasters including the BBC and the ABC. DW material is broadcast on many community stations across Australia.

The environment has local significance to most (if not all) communities in Australia. Climate change is arguably the most pressing environmental issue in living memory. Among other potential consequences, significant social and economic upheaval has been forecast as a by-product of climate change.

Regrettably, climate change has – in our opinion – been politicised; said politicisation being aided and abetted by mainstream media outlets. This has been to the detriment of logic and rationality insofar as considering the causes and potential solutions.

As such, providing apolitical and fact-based material discussing climate change is both of local significance and fulfils a community need. One member of the Programming Subcommittee has suggested that failure to broadcast such material would constitute “a dereliction of duty to Lofty's licence area”.

### Syndication Assessment Matrix – Living Planet

Criterion	Assessment	Score	Justification
<i>Origin</i>	Overseas (Germany)	3.0	
<i>Barrier to entry</i>	Very High	10.0	DW has global resources
<i>Overall quality</i>	Very High	5.0	High production values
<i>Local significance</i>	Social, economic, political	22.5	Environmental issues are of global concern. Resultant social, economic and political upheaval is of local significance.
<i>Community needs</i>	Identified and researched	15.0	Based on listener feedback, survey results etc. Complements and supplements similar material from ABC RN and ABC News Radio.
<i>Compatibility</i>	High	10.0	Fits current programming; local significance and community needs established. High quality programming from reputable source.
<i>Cost</i>	Free	10.0	Sourced directly from DW, free of charge.
<i>News &amp; Talk</i>	No obvious bias, highly reputable source, aligns with Lofty's culture and ethos, minimal overlap.	8.0	DW is Germany's national broadcaster and is well regarded for its quality and neutrality.
<b>TOTAL SCORE</b>		<b>83.5</b>	

Living Planet is considered a *desirable* syndicated program. At the time of writing, Living Planet airs on Lofty every Sunday morning at 9am.

## APPENDIX C: Case study 2 - Upfront Soul

Upfront Soul is a weekly 120-minute program produced by Sanguine Fromage; an independent program maker based in the USA.

The show developed a good following during Lofty's initial phase as an online-only radio station in 2017 and 2018, resulting in Upfront Soul following Lofty onto FM on Tuesday nights. The move to FM caught the attention of a number of listeners in the local community, thus uncovering a community need.

At least one listener, Claudine Burgess, was drawn to join Lofty as a result of hearing Upfront Soul and a desire to launch a local equivalent. Lofty expects Claudine to launch her new program, "Soul Trader" in early 2020.

Whilst Upfront Soul was adopted and subsequently retired prior to the introduction of the Syndication Assessment Matrix, we have compared this material against the matrix as a demonstration of how Lofty may justify use of a syndicated programming to establish a community need for conversion into material of local significance.

### ***Syndication Assessment Matrix – Upfront Soul***

<b>Criterion</b>	<b>Assessment</b>	<b>Score</b>	<b>Justification</b>
<i>Origin</i>	Overseas (USA)	3.0	
<i>Barrier to entry</i>	Low	2.0	Whilst well-researched, finding a suitable presenter within the licence area wasn't overly difficult.
<i>Overall quality</i>	High	4.0	MP3 192kbps. Full playlists provided. Good research and artist notes.
<i>Local significance</i>	None	0.0	Whilst the content meets a community need, the presenter is not of a locally significant background.
<i>Community needs</i>	Identified and researched	15.0	Listener feedback and subsequent recruitment of presenter within licence area confirms community interest.
<i>Compatibility</i>	Low	2.0	This program was a valuable community need research tool. As need was established and locally significant replacement is imminent, Upfront Soul is largely incompatible with Lofty.
<i>Cost</i>	Free	10.0	Sourced via Radio4all and broadcast with permission.
<b>TOTAL SCORE</b>		<b>36.0</b>	

Upfront Soul served a highly valuable purpose in proving a community need and creating an opportunity to broadcast more locally significant material. We consider the retirement of Upfront Soul in early 2019 as a success, due to the results yielded when used as an empirical research tool.

## APPENDIX D: Case study 3 - Cool Nights

Cool Nights is a weekly 60-minute program produced by Steve Hart, an independent program maker based in Auckland, New Zealand. Scheduled as part of Lofty's Sunday Night Jazz programming block; an established block of programming focused on Jazz music.

Steve specialises in Smooth jazz, a hybrid of Jazz fusion and soul music that developed in the mid-1970s. The sub-genre entered its decline in the early 1990s, but still has a small yet enthusiastic following. Cool Nights is currently one of Lofty's most popular shows.

### Syndication Assessment Matrix – Cool Nights

Criterion	Assessment	Score	Justification
<i>Origin</i>	Overseas (NZ)	3.0	
<i>Barrier to entry</i>	Medium-Low	4.0	A particularly well curated program within a sub-genre. Barrier was considered high when Cool Nights was first introduced. Latent community need uncovered for smooth jazz. Creates opportunity to introduce locally significant smooth jazz program.
<i>Overall quality</i>	High	4.0	MP3 192kbps. Full playlists provided. Good research and artist notes.
<i>Local significance</i>	Cultural	7.5	Hosted by British ex-pat living in NZ. Local significance based on relatability to Steve by significant British and NZ migrant populations within licence area.
<i>Community needs</i>	Identified and researched	15.0	Based on listener feedback, survey results etc. Not offered by any other broadcaster in licence area.
<i>Compatibility</i>	High	10.0	Fits current programming; local significance and community needs established. High quality programming from reputable source.
<i>Cost</i>	Free	10.0	Sourced directly from Steve, free of charge.
<b>TOTAL SCORE</b>		<b>53.5</b>	

At the time of writing, Cool Nights airs on Lofty every Sunday at 9pm, and has been a staple of Lofty's Sunday Night Jazz block since Lofty commenced its initial online stream in 2017. It is a well-crafted niche program with a strong following.

Despite having a solid score (53.5 out of a possible 90), Cool Nights' desirability is considered neutral at best, and is now on Lofty's placeholder list.

The community need for smooth jazz music may not have been discovered were it not for Lofty using syndication as a community needs research tool. As a result, a great opportunity has been created to attract one or more presenters to create a locally significant smooth jazz program within the licence area.

Lofty expects to retire Cool Nights upon the successful recruitment and subsequent commencement of a suitable local presenter/producer.

## **Appendix 17.7**

### **Volunteering**

Lofty Policy 3.2.1



## POLICY DOCUMENT 3.2.1

<b>Policy Name (full)</b>	Participation > Volunteering > Rights and Responsibilities
<b>Policy Family</b>	3 - Participation
<b>Version/Date</b>	V1.0 21 July 2019
<b>Maintained By</b>	Board

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### PRECIS

As we are 100% reliant on volunteer labour for our operations, it behoves Lofty to treat its volunteers with respect and dignity at all times.

In return, Lofty expects its volunteers to act with utmost integrity during the course of representing us. *[refer Code 2.3]*

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### Background

Lofty is a not-for-profit community radio station, which is operated by a 100% volunteer workforce. Our volunteers come from a wide range of backgrounds and volunteer for different reasons, including:

- to contribute something to the community,
- to develop professional skills,
- to maintain existing skills,
- to enjoy the social nature of the organisation,
- to facilitate personal growth.

We aim to treat all of our volunteers equally, with respect and trust, and to provide a workplace that is safe, enjoyable and fulfilling. We will endeavour to provide a working environment that is flexible in order to allow our volunteers to gain the benefits they wish from volunteering.

Conversely, we expect our volunteers to act professionally and in good faith towards our station at all times. We expect that they hold the interests of our station and its community in equal regard to their own to ensure positive outcomes for themselves, our station and the community we serve.

### Purpose

The purpose of this policy is twofold:

1. To set clear and reasonable expectations of Lofty to our volunteers.
2. To set clear and reasonable expectations of our volunteers to Lofty.

### Principles of Volunteering

Volunteering:

- benefits the community and the volunteer;
- is always a matter of choice;
- is an activity that is unpaid and not undertaken for the receipt of salary, pension, government allowance or honorarium;
- is a legitimate way in which citizens can participate in the activities of their community;
- is a vehicle for individuals or groups to address human, environmental and social needs;
- does not replace paid workers nor constitute a threat to the job security of paid workers;
- respects the rights, dignity and culture of others; and
- promotes human rights and equality.

## **The rights of volunteers**

### You have the right to:

- be treated as a co-worker;
- suitable assignment with consideration for personal preference, temperament, abilities, education, training and employment;
- know as much about the organisation as possible, its policies, people and programs;
- expect clear and open communication from management and staff at all times;
- be given appropriate orientation, introduction and provision of information about new developments;
- sound guidance and direction in the workplace,
- advance notice (where possible) of changes which may affect your work (such as programming changes);
- undertake your volunteer activity without interruption or interference from management, staff or other volunteers;
- a place of work complying with statutory requirements in regard to equal employment, anti-discrimination legislation, the Commonwealth Racial Discrimination Act 1975 and occupational health and safety standards;
- be heard, to feel free to make suggestions and to be given respect for your honest and constructive opinion;
- appropriate insurance cover such as volunteer and public liability insurance;
- appropriate grievance procedures in the event of a dispute and, if necessary, mediation or arbitration to assist with resolving the dispute;
- receive written notification and reasons for suspension/release of services;
- have services appropriately assessed and effectively recognised; and
- have training provided that will enable participation at the station at a variety of levels;

## **The responsibilities of volunteers**

### You have the responsibility to:

- have a professional attitude towards your voluntary work;
- be prompt, reliable and productive with regard to commitments and agreements made with Lofty;
- notify the appropriate person if unable to meet commitments;
- accept and abide by station rules; and
- understand and adhere to the Codes and maintain familiarity with broadcast laws such as defamation law and the Broadcasting Services Act 1992 (Cth);
- not to represent Lofty publicly or commercially unless prior arrangement has been made;
- not to bring into disrepute the operations, management, staff or other volunteers of Lofty;
- treat technical equipment with due care and respect and to notify technical staff of faults and problems;
- undertake to complete a minimum of the basic level of training offered at the station if you are intending to work in any area of programming;
- you may have fair and reasonable access to station resources for personal or private *non-commercial* use where available, subject to Board consent (notwithstanding reasonable use provisions in terms of Lofty's Information Technology Usage Policy);
- ensure that the station has your current contact details;
- respect the racial and religious backgrounds and the sexual preferences of your co-volunteer workers and work to ensure that Lofty is a safe work place for everyone; and
- contribute to the achievement of a safe, tolerant and equitable working environment by avoiding, and assisting in preventing, behaviour which is discriminatory and/or constitutes harassment in any way, shape or form.



## **The rights of Lofty**

### Lofty has the right to:

- expect your cooperation in working to uphold and maintain the station's codes and policies, including but not limited to our Lofty Goals and program policies;
- expect you to be familiar with the laws relating to broadcasting, station policies and procedures;
- expect you to be prompt, reliable and productive with regard to commitments and agreements made with Lofty;
- have confidential information respected;
- expect any potential or actual conflicts of interest be brought to Lofty's attention as soon as they arise;
- make a decision, in consultation with you, as to where your services and skills would best be utilised;
- make decisions which may affect your work;
- make programming decisions in accordance with programming policies and procedures;
- develop, implement and enforce rules, policies and procedures for all aspects of station operation;
- develop and maintain all property and residence of the station;
- provide you with feedback to enhance your programming and broadcasting development;
- expect clear and open communication from you at all times; and
- suspend or dismiss you in accordance with station policies and procedures due to contravention of station rules.

### Lofty has the responsibility to:

- provide you with a work environment which embraces the principles of access and equity;
- value the importance of your role within the organisation;
- place you in an appropriate, suitable position and environment;
- give you appropriate tasks in accordance with your strengths, abilities, training and experience;
- provide you with training so that you can expand your expertise and abilities,
- acknowledge your contribution to the station and provide you with the appropriate recognition and/or rewards;
- ensure that the management and Board have the appropriate skills required to work with you;
- provide adequate opportunities for formal and informal constructive feedback;
- provide you with information regarding any activities or changes at the station which may affect your work;
- consult with you (where possible and practicable) on issues that may affect your work;
- ensure that all station democratic processes are adhered to and that you are consulted in major decision-making processes; and
- ensure that you are aware of station democratic processes and are encouraged to participate in them.

## **Further information**

Please refer to Policy Families:

- 3.1 Participation > Membership
- 3.3 Participation > Rights and Obligations
- 3.4 Participation > Conflict Resolution

## **Appendix 17.8**

### **Sponsorship**

Lofty Policy 4.1.2



## POLICY DOCUMENT 4.1.2

<b>Policy Name (full)</b>	Programming > Sponsorship Principles
<b>Policy Family</b>	4 – Programming
<b>Version/Date</b>	V1.0 9 Feb 2019
<b>Maintained By</b>	Programming Subcommittee, in conjunction with the Marketing & Community Engagement (MACE) Subcommittee

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### PRECIS

Lofty's Sponsorship Principles policy sets out the basic rights and obligations of both Lofty and the Sponsor, thus setting expectations for both. *[refer Code 6.1]*

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### INTRODUCTION

In order to fund regular operations, Lofty is entitled to seek up to five (5) minutes per hour of paid sponsorship, pursuant to the Broadcasting Services Act 1992 (the Act) and in terms of the Community Radio Broadcasting Codes of Practice 2008 (the Codes).

Our Sponsorship Principles set out the rules of engagement between Lofty and the Sponsor. This document is an adjunct to Lofty's Constitution, and is written pursuant to the Act and the Codes.

Said Principles form the basis of Lofty's Sponsorship Policy.

Where applicable, this document shall reference underlying Policies, the Act and/or the Codes, with a layperson's interpretation given where appropriate.

### PRINCIPLES

1. All Spots shall be of suitable broadcast quality, irrespective of whether said Spot is produced by Lofty or supplied by the Sponsor.
2. Spots shall meet the appropriate community standards for the timeslot in which they are aired.
3. Spots shall be compatible with Lofty's standards, including but not limited to the Lofty Constitution.
4. In terms of Principle 3, Lofty reserves the right to refuse to air a Spot where:
  - a. the spot is deemed to contain *election matter*, irrespective of whether or not an election has been called; or
  - b. the Spot promotes an event, product or service religious nature, where said sponsorship relates directly to a worship service, seminar, workshop or other public event where the primary purpose of said event is to promote a specific religious agenda; or
  - c. the Spot promotes gambling products and/or services; or
  - d. the Spot is deemed by Lofty to be of a racist, sexist or otherwise vilifying nature; or
  - e. the Spot contains explicit pricing details of the event(s), good(s) and/or service(s) being offered in said spot; or
  - f. in Lofty's opinion, said Spot may be breach of the Act or the Codes; or
  - g. the Spot is otherwise deemed by Lofty to be incompatible with either Lofty's or the Sponsor's brand; or
  - h. any other valid reason as Lofty sees fit.

5. Where a Spot has fallen outside of Principle 4, Lofty is to provide a clear explanation to the Sponsor as to why said Spot is unsuitable for airing as proposed. Furthermore, Lofty will endeavour to work with the Sponsor, where possible, to amend an existing Spot or create a new Spot that is compatible with Lofty's Sponsorship Principles.
6. In terms of Code 6.1(b), the Spot shall contain a clear Station Sponsor tag, identifying the Spot as being a paid spot that has been sold to by Lofty to a Sponsor.
7. Pursuant to Codes 6.2, 6.3 and 6.4, a Sponsor shall not influence the content and style of individual programs and/or the overall sound of Lofty. However, a Sponsor may purchase either naming rights and/or exclusivity rights to sponsor an individual program subject to the program's presenter(s), producer(s) and/or curator(s) retaining full creative control of said program.
8. A Sponsorship Agreement may only be entered into when said Agreement is executed by Lofty's appointed delegate.
9. Under no circumstances shall a Lofty member enter into an agreement with a Sponsor on behalf of Lofty UNLESS they are an appointed delegate in terms of principle 8.
10. Under no circumstances shall a Sponsor or potential Sponsor furnish a member with gifts, products, services or payments in return for promotion of a product, service or business.
11. Where a Sponsor wishes to provide Lofty with goods and/or services either as an adjunct to or in lieu of sponsorship funding, such proposals are to be referred to the Lofty Board for consideration.
12. The Sponsor is responsible for ensuring their announcement(s) meet any legal obligations applicable to the event(s), product(s) and/or service(s) being offered, and indemnify Lofty against any loss or damage where said obligation is not met.
13. Whilst Lofty shall take all due care in the preparation of the Spot, Lofty is not responsible for any errors or omissions by accident and/or in good faith.
14. Sponsorship announcements shall not contain any recorded works subject to licencing restrictions by APRA AMCOS, PPCA and/or any equivalent rights holders and/or their agents UNLESS the sponsor provides written evidence to confirm that they are licenced to use said recorded works for advertising purposes AND Lofty has received confirmation from said rights holder and/or their agents that said licence is valid for use in the proposed Spot.
15. Unless otherwise specified on the Sponsorship Agreement, scheduling of Spots shall occur on a ROS (run of station) basis.
16. Where a Spot is being produced by Lofty for the Sponsor, said production shall not proceed until the brief is agreed upon in writing between both parties.
17. A Spot shall not be aired until the Sponsor has granted final approval of said spot in terms of the brief. Said approval is to be granted in writing.
18. Unless otherwise agreed, a standard Sponsorship Agreement shall be in force for three (3) calendar months from the first air date of the Spot.

19. A payment of one-third of the total agreed Sponsorship amount shall be paid to Lofty prior to the first air date of the Spot, with subsequent payments due monthly on the anniversary date of the first air date.
20. A minimum financial commitment may apply, based on whether a Sponsor is entering a new campaign, renewing an existing campaign, or has entered into an agreement with Lofty to undertake a rolling campaign.
21. Upon receipt of the final payment, Lofty shall contact the Sponsor to seek feedback on the campaign, and to invite the Sponsor to consider either renewing the current campaign or designing a new campaign.
22. A Sponsor may request a rolling campaign where there is no set end date. Lofty shall not place the Sponsor on a rolling campaign until said request for rolling campaign is received in writing from the Sponsor.
23. Where a Sponsor has entered into a rolling campaign with Lofty, payments are to be made monthly in advance, and the agreement may be cancelled with a minimum one (1) calendar month notice in writing, delivered either electronically or via paper format.
24. Lofty shall provide the Sponsor with a run sheet showing when the Sponsor's Spot is due to air, along with reports confirming actual air dates/times of said Spot in hindsight.

## GLOSSARY & DEFINITIONS

<b>AMCOS</b>	<i>Australasian Mechanical Copyright Owners Society.</i> AMCOS manages mechanical royalties, defined by AMCOS as "the reproduction or copying and storage of music in different formats. This covers copying of songs and compositions by record labels or other parties to sell them on CD, DVD, online, for use as production music and for radio/TV programs".
<b>APRA</b>	<i>Australasian Performing Rights Association.</i> APRA collects and manages royalties on behalf of over 100,000 songwriters, composers and music publishers. APRA covers the copyright in the song viz. lyrics and composition.
<b>APRA AMCOS</b>	In 1997, APRA and AMCOS formed an alliance. This alliance is referred to by <i>APRA AMCOS</i> as a "one-stop service to music creators and music customers".
<b>ELECTORAL MATTER</b>	<i>Electoral matter</i> is matter that is communicated, or intended to be communicated, for the dominant purpose of influencing the way electors vote in an election of a member of the House of Representatives or of Senators for a State or Territory (sections 4(1) and 4AA of the <a href="#">Electoral Act</a> ).
<b>LOFTY</b>	Lofty Community Media Incorporated ABN 73 798 304 687.
<b>PPCA</b>	<i>Phonographic Performance Company of Australia Limited.</i> PPCA collects and manages royalties on behalf of the copyright holders of a recording and/or a music video in a song; usually a record company, however some independent musicians that control the recording and distribution of their own music may also be members of PPCA.
<b>ROS</b>	<i>Run of Station.</i> This is a technical term used in radio where sponsorship spot placement is at the discretion of the station.
<b>SOCIALS</b>	<i>Social media</i> , including but not limited to Facebook, Twitter and Instagram.
<b>SPOT</b>	A sponsorship announcement, usually not exceeding 30 seconds in length.