



**COMPLAINTS
and
DISPUTES
POLICY
2026/2027**



BACKGROUND

Volunteers agree to comply with all codes, regulations and legislation relevant to Voice FM and community broadcasting stations, and undertake to read and comply with any rules and regulations which are communicated by management of Voice FM. This includes, but is not limited to, the Codes of Practice developed through the Community Broadcasting Association of Australia (<https://www.cbaa.org.au/resource/community-radio-broadcasting-codes-practice>).

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

Voice FM undertakes to handle such situations in the utmost professional manner, ensuring communication between the station and the volunteer is clear, fair, objective and remains within the policy outlined below.

PURPOSE

The purpose of this policy is to outline the most appropriate way for Voice FM to respond to complaints, and other comments from members of the public.

Voice FM acknowledges the right of our listeners, members and volunteers to comment and make complaints in writing concerning:

- alleged non-compliance with both the licence conditions in the Act and the requirements outlined in the Codes of Practice,
- program content, and
- the general service provided to the community.

SCOPE

This policy applies to: Presenters, Members, Staff, Volunteers, Guests and Contractors:

POLICY

Voice FM will ensure:

- Complaints will be handled fairly, objectively, and confidentially in a timely manner
- Persons making complaints will be:
 - a) listened to, treated with respect by our workers and actively involved in the complaint process where possible and appropriate;
 - b) provided with reasons for our decisions
- every reasonable effort to resolve complaints, except where a complaint is clearly frivolous, without sufficient grounds or not made in good faith.



- that this policy and associated procedure is freely available
- complaints will be conscientiously considered, investigated if necessary and responded to substantively as soon as possible,
- complaints will be responded to in writing within 60 days of receipt as required in the CBAA Codes of Practice 2025, and the response will include a copy of the CBAA Community Radio Broadcasting Codes of Practice,
- Complainants are advised in writing that they have the right to refer their complaint about a Code matter to ACMA provided they have first:
 - formally lodged their complaint with the licensee, and
 - Received a substantive response from the licensee and are dissatisfied with this response or did not receive a response from the licensee within 60 days after making the complaint.
 - A written complaint or response can be provided via a letter, fax or email.
- A responsible officer of the licensee will maintain a record of complaints and responses for a period of at least two years from the date of the complaint.
- The record of complaints and responses will be made available to ACMA on request.

REPORTING AND RECORD KEEPING

Voice FM will ensure that:

- a record of material relating to complaints, including logging tapes or audio copies of broadcast material, and written documentation will be retained for 24 months, including:
 - the date and time the complaint was received,
 - name and address of the complainant,
 - the substance of the complaint, and
 - the substance and date of the licensee's response outcome of the complaint

CODE COMPLAINTS

- Complaints that we have breached the Community Radio Broadcasting of Australia Codes of Practice, should first be addressed to us and will be dealt with in accordance with our complaints and disputes policy or procedure stated above.



- Voice FM will acknowledge receipt of Code Complaints promptly in writing.
- Code Complaints must:
 - be received within 30 days of the relevant broadcast, if about material broadcast;
 - be made via email or letter
 - contain the name and contact details of the complainant
 - include sufficient detail of the complaint (e.g., date, time, program, and description of the material, which Code alleged to be breached)
- Voice FM will reply to Code Complaints in writing as soon as is practicable, and at the latest, within 60 Days of the receipt of the complaint. Our reply will respond to the concerns raised in the Code Complaint and inform the complainant of their right to refer the complaint to the ACMA if they are unsatisfied with our response.

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

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

INTERNAL GRIEVANCE POLICY AND DISPUTE RESOLUTION PROCEDURES

INTRODUCTION

- Open communication and feedback are regarded as essential elements of a satisfying and productive work environment.
- VOICE FM encourages its volunteers to resolve any issues or concerns that they may have at the earliest opportunity with each other or, failing that, the Station Manager or representative of the Board of Directors.
- The preferred process involves volunteers resolving issues to their satisfaction internally, without feeling they have to refer to external organisations or to authorities for assistance.

PURPOSE

The purpose of this document is to provide an avenue through which volunteers can resolve work- related complaints as they arise.



INTERNAL COMPLAINTS/GRIEVANCE POLICY

- Voice FM will establish mechanisms to promote fast and efficient resolution of workplace issues.
- One of these mechanisms will involve the Board of Directors appointing a representative to investigate the internal grievance should it decide to deal with the complaint in accordance with Rules 13 – 17 of the Stations Constitution. (Rules of the Ballarat Community FM Radio Co-operative Limited trading as Voice FM 99.9)
- Volunteers should feel comfortable discussing issues with the appointed representative of the Board of Directors in accordance with the procedures outlined below.
- All formal avenues for handling of grievances will be fully documented and the volunteer's wishes will be taken into account in determining the appropriate steps and actions.
- No volunteer will be intimidated or unfairly treated in any respect if they utilise this Policy to resolve an issue.
- This Policy applies to all members and volunteers.

Responsibilities

It is the responsibility of the Management to ensure that:

- They identify, prevent and address potential problems before they become formal grievances;
- They are aware of and committed to the principles of communicating and information sharing with their volunteers;
- All decisions relating to station practices are made with consideration given to the ramifications for the individual, as well as the organisation in general;
- Any grievance is handled in the most appropriate manner at the earliest opportunity;
- All volunteers are treated fairly and without fear of intimidation.

It is the responsibility of Volunteers to ensure that:

- They attempt to resolve any issues with the other involved party directly before escalating the matter to the Board of Directors.

It is the responsibility of the Board of Directors to ensure that:

- All members and volunteers are aware of their obligations and responsibilities in relation to communication and information sharing amongst each other;



- Ongoing support and guidance is provided to all volunteers in relation to employment and communication issues;
- All members and volunteers are aware of their obligations and responsibilities in relation to handling grievances;
- Any grievance that comes to the attention of Board of Directors is handled in the most appropriate manner at the earliest opportunity.

INTERNAL DISPUTE RESOLUTION PROCEDURES

Anyone who is asked by the Management to investigate and intervene in an internal dispute should be aware of the possible ramifications of their actions when dealing with volunteer issues. They must ensure that all members and volunteers are treated with fairness, equality and respect.

If there are any doubts or queries in relation to how to deal with a particular set of circumstances, the matter should be handed to the Board of Directors for advice at the earliest opportunity.

Where a grievance or dispute has been brought to the attention of the appointed representative of the Board of Directors, the guidelines below should be followed.

Grievances and Dispute Resolution

A volunteer who considers that they have a dispute or grievance that they have not been able to resolve directly with any other involved party should raise the matter with the Board of Directors, who will assign a representative as a first step towards resolution. The two parties should discuss the matter openly and work together to achieve a desired outcome.

The representative of the Board of Directors assigned to investigate the internal grievance should follow the steps outlined below:

- Make sure that the volunteer feels listened to and supported. You don't have to agree with what they say, but you must make sure that they know you will act on their concerns.
- If more than one person is present, establish the role of each person.
- Outline the process that is to be followed.
- Inform the parties that any information obtained in the conduct of the review is confidential.
- Listen to the complainant. Obtain a chronology of events (who, what, why, when, how etc).
- Run through the applicable policies and procedures with the complainant.



- Ask the complainant what kind of outcome they are hoping for (best case scenario) and then talk them through next steps: e.g. you will discuss the matter confidentially with the Chair or Vice - Chair to determine a way in which to deal with the issue and report back to them within a set timeframe.

Internal Grievance Policy and Dispute Resolution Procedures (CBAA Code 1.5)

- Explain to the complainant that they cannot be adversely affected because they have made a complaint, and explain who to report matters to internally if they do feel that they are being adversely affected.
- Provide the complainant with plenty of time to ask questions.
- Offer the complainant assistance.
- Provide the complainant with a direct contact number that they can call if they have any concerns of queries.
- Take accurate and detailed notes of all conversations (including dates, people involved) and attach any supporting documentation.
- If deemed necessary, provide the volunteer with a written summary of the meeting and clarification of the next steps to be taken.

The Management representative appointed to investigate the internal grievance must ensure that the manner in which the meeting is conducted will be conducive to maintaining positive working relationships, and will provide a fair, objective and independent analysis of the situation.

All parties are to maintain complete confidentiality at all times.

If the matter is not resolved and the member or volunteer wishes to pursue it and/or Management recommends further action, they will refer the issue to the Board of Directors for discussion. Again, the matter is to be discussed openly and objectively with the Board to ensure it is fully understood. The Board reserves absolute discretion as to making a final decision as to how the grievance or dispute will be resolved using the Rules of the Ballarat Community FM Radio Co-operative Limited under Part 2- Membership (Division 1 and 2) as its guide.

Investigating a Grievance or Dispute

Procedural fairness and transparency can make or break an investigation. Maintaining procedural fairness means that you can:

- protect the interests of the participants in the investigation;
- enhance the credibility of the investigation process;
- rely on the investigation (and your findings) when making decisions



Following are some pointers to ensure that an investigation is procedurally fair.

The Station representative investigating should ensure that:

- the respondent is aware of all the allegations made against them in sufficient details
- the respondent is allowed a reasonable opportunity, including adequate time, to respond to each of the allegations;
- the investigation is carried out in a reasonable time frame;
- all participants are given the opportunity to have a support person, (pre-approved by the Board), in the interviews pertaining to the investigation.
- all participants are required to maintain confidentiality;
- the investigator has no personal interest or bias in the matter being investigated;
- all participants are given the opportunity to respond to any contradictory evidence;
- the investigator makes reasonable and diligent enquiries to ensure that there is sufficient evidence before making findings on the balance of probabilities and presenting their recommendations to the Board of Directors.

Internal Grievance Policy and Dispute Resolution Procedures

As stated in - CBAA Codes of Practice Code 10

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

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

Disciplinary Summary

1. The process for disciplinary action includes:
 - Verbal Communication
 - Formal notice in writing
 - Suspension and appeal process
 - If necessary, a notice of dismissal of the volunteer from duties
2. For issues that are considered minor, a conversation with the volunteer may be appropriate; however this will not be considered part of the formal disciplinary action (although it may be referred to in later action.)
3. Written notice will include details of the issue and, where feasible, evidence. In a case where the Disciplinary measure has been instigated by a complaint, it may be appropriate to include a copy (with identification removed) or extract of this complaint.



4. Further disciplinary actions, such as a suspension of volunteer duties for a period of time, may also be deemed appropriate. In such cases these actions will be included with the formal notice in writing.
5. Re: programming - every effort will be taken to ensure that notice of a disciplinary measure, whether formal or informal, will be given at an appropriate time, eg: not immediately prior to, or during a broadcast
6. Notice of a disciplinary measure will be given by a designated Board of Directors member.
7. Volunteers will also be provided an appeal against the action. This may take the form of a meeting with the appropriate staff or board member, or a representation in person and/or in writing to the Board of Directors.
8. The volunteer may bring a representative (pre-approved by the Board), to any such meeting if they choose.
9. Should this appeal result in a change in the disciplinary action, or removal of it, this will be confirmed in writing to the volunteer.
10. Conduct which may lead to disciplinary action includes, but is not limited to:
 - Poor timekeeping and unreliability

Not following pre-existing station rules and policies, including programming policies and program briefs.
 - Engaging in acts or broadcasts which may breach the Ballarat Community FM Radio Co-operative Ltd Codes of Practice.
 - Engaging in broadcasts which may breach other related legislation such as the Broadcasting Services Act 1992 (which includes sponsorship provisions), copyright or defamation.
 - Inappropriate handling or use of station equipment or other property
 - Inappropriate behaviour towards other volunteers or staff members
 - Intoxication through alcohol or other substances
 - Publicly bringing Voice FM into disrepute (including online/text)
11. Some conduct may be tantamount to 'gross misconduct', in this instance a volunteer may be dismissed without prior warning.
12. Conduct which may be classed as gross misconduct may include, but is not restricted to:
 - Verbal, physical or sexual harassment of any other volunteer, employee, member or guest of Voice FM particularly in respect of race, sex or religion.
 - Wilful damage to or theft of property belonging to Voice FM other volunteer, employee, member or guest of Voice FM



- Falsifications of any of the organisation records for personal gain
- Commercial misrepresentation of Voice FM
- Misinformation to regulatory bodies without following correct Co-operative policy procedures

13. In a case of a volunteer being dismissed without prior warnings the volunteer will be provided an appeal as outlined in point 7.

For a more detailed and comprehensive outline of procedures refer to:

Rules of the Ballarat Community FM Radio Co-operative Limited under Part 2- Membership (Division 1 and 2)

Available at www.voicefm.org.au