



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

Guidance notes

Community Radio Broadcasting Codes of Practice (2025)

2025



Contents

Introduction	3
Code 1 Application	4
Code 2 Governance	8
Code 3 Diversity, Independence and Our Community	13
Code 4 Material Not Suitable for Broadcast	29
Code 5 News and Journalistic Content	38
Code 6 Emergency Information	48
Code 7 First Nations Engagement and Programming	56
Code 8 Australian Music	60
Code 9 Sponsorship	64
Code 10 Complaints and Disputes	19



Introduction

This document compiles the Community Radio Broadcasting Codes of Practice (2025) (the Codes) guidance notes into one document.

For more information about the Codes, please access the CBAA website at <https://www.cbaa.org.au/community-broadcasting/codes>.

Guidance Note

Code 1: Application

Code 1.2

- 1.2 We must comply with the Code, but a failure to comply will not be a breach of the Code provided that we took reasonable precautions and exercised due diligence, and the non-compliance was:
- a) in respect of a minor, peripheral, incidental or trivial matter; or
 - b) due to an act or failure to act of another person which was outside of our control, or an accident, technical/engineering issue, or some other cause, which was outside our control.

Code 1.2 acknowledges that there might be times when a station accidentally or mistakenly fails to comply with the Codes. Code 1.2 makes an allowance for minor failures to comply where the station genuinely believed they were doing the right thing and had taken all appropriate steps to prevent accidents or mistakes.

The Code only covers failures to comply where reasonable precautions were taken and due diligence was exercised. Reasonable precautions and due diligence means stations should be able to show that they had taken appropriate steps to prevent an accident or mistake taking place. This might include:

- ensuring new volunteers have completed training on the Codes,
- making refresher training on the Codes and legal obligations available for all volunteers,
- air checks of all programming and maintaining, and
- complying with complaints handling processes.

The failure to comply could be either:

A 'minor, peripheral, incidental or trivial' matters which in the case of broadcasts would likely cover material unlikely to offend or significantly mislead listeners. And in the case of operations would likely cover matters that are not serious breaches of essential Code requirements.

Or

A mistake or accident which was outside the station's control. It is also important to note that technical matters would generally be considered in the station's control. Whether or not a non-compliance caused by a technical matter would be considered a breach would depend on the individual circumstances. Contractual arrangements with service providers (e.g. technical contractors) are also generally considered under a station's

control. It is important to note that stations have obligations under their apparatus licence and the *Radiocommunications Act 1992 (Cth)* to be complied with which include antenna height and not moving a station's antenna without being granted permission through an amendment to an apparatus licence condition. Note that *Radiocommunications Act* obligations are distinct from Code obligations, so Code 1.2 has no effect on a station's obligations to comply with for instance the technical conditions of its apparatus licence.

A mistake or accident will be less likely to be a breach of the Codes if a station:

- Had taken all appropriate steps to prevent an accident or mistake taking place.
- Believed that it was doing everything correctly.
- Would not have been able to prevent the accident or mistake from occurring.
- Acted immediately to correct the accident or mistake when they found out about it.

Guidance Note

Code 1: Application

Code 1.3

- 1.3 We will broadcast an on-air announcement at least once a week that contains information about the Codes, a short description of matters covered by the Codes and where listeners can get a copy. A copy of the Codes will also be made accessible via our website (or via our social media page if no website exists).

Example transcript

"What you hear on community radio is governed by the community broadcasting codes of practice.

The codes of practice cover matters relating to program content that are of concern to the community including local content, news, current affairs, Australian music content, programs for children and the responsibilities associated with broadcasting to the community. They also cover aspects such as community access and participation in the operation of this service.

Copies of the codes are available from the Community Broadcasting Association website: www.cbba.org.au"

Guidance Note

Code 1: Application

Code 1.3

- 1.3 We will broadcast an on-air announcement at least once a week that contains information about the Codes, a short description of matters covered by the Codes and where listeners can get a copy. A copy of the Codes will also be made accessible via our website (or via our social media page if no website exists).

Broadcasting an on-air announcement at least once a week about the Codes helps inform listeners that community broadcasters are meeting their Code requirements.

The following script is an example of a community service announcement that could be recorded and played to meet the requirements of Code 1.3.

This example points the audience to the website of the Community Broadcasting Association of Australia to download a copy. While this would satisfy the requirements of the Codes, stations are encouraged to make copies available on their websites or through a direct request to the station. As such, stations may edit the script accordingly.

"What you hear on community radio is governed by the Community Radio Broadcasting Codes of Practice. The Codes of Practice cover matters relating to program content, including local content, news, current affairs, Australian music content, programs for children and the responsibilities associated with broadcasting to the community. They also cover aspects such as community access and participation in the operation of this service. Copies of the Codes are available on the Community Broadcasting Association website."

Guidance Note

Code 2: Governance

Code 2.1

- 2.1 We must have in place, abide by, and regularly review key Governance documents including:
- a) our constitution, or equivalent Governance document;
 - b) Governance policies.

Policies and procedures help keep stations accountable to staff, volunteers, members and the community. They allow stations to set standards of conduct and behaviour that are in keeping with station values and community radio's Guiding Principles. They help to guide decision making and streamline day-to-day operations. They ensure stations comply with the Community Radio Broadcasting Codes of Practice, licencing obligations and legal requirements. They also let people know where they can turn for help and assist stations to manage complaints and disputes.

Stations should review policies and procedures regularly to ensure they keep up to date with broadcast media best practice and regulatory requirements. Stations should establish a regular schedule for reviewing policies. The review cycle should be annual or at least every three years. It is a good idea to include policy review as a standing item on the agenda for board meetings to ensure that policies are updated whenever change is required.

Every station has a slightly different way of organising and naming their key policies and procedure, but it is important that stations have policies and procedures covering the topics in this list:

- Corporate Governance Policy
- Complaints and disputes Policy
- Community participation
- Programming Policy
- Volunteering Policy
- Sponsorship Policy
- Privacy Policy

Additional policies and procedures that stations are encouraged to adopt include:

- Anti Discrimination Policy

- Child Safety Policy (mandatory in Victoria for stations with volunteers or employees under 18)
- Code of Conduct Community engagement Policy (participation/consultation)
- Conflict of Interest Policy
- Disability Access and Inclusion Policy
- First Aid Policy
- Email, Internet & Computer Access Policy
- Emergency Broadcasting Policy
- Membership Policy
- Music Policy
- Presenter Policy
- Risk Management Policy
- Social Media Policy
- Sexual Harassment Policy
- Workplace Bullying Policy
- Workplace Drug & Alcohol Policy
- WH&S Policy

Guidance Note

Code 2: Governance

Code 2.2

- 2.2 We must ensure that the Governance documents listed at 2.1 and our annual reports, including annual financial statements are freely available (e.g., via our website, social media page, Australian Charities and Not-for-profits Commission's website).

Code 2.2 requires stations to make key Governance documents easy to access. The best way to comply with this Code is for stations to publish the policies on their website including:

- Constitution, or equivalent Governance document
- Annual report
- Annual financial statements
- Governance policies: stations have some discretion about how their governance policies are set out. At a minimum, policies published online should cover: corporate governance, membership (e.g. a Board or Committee Charter), internal conflict, complaints and disputes, community participation, programming, volunteering, sponsorship, privacy.

Making these documents freely available is important to ensure that stations are accountable and transparent.

If a station does not have a website, it is advisable that it works towards getting one. Meeting this requirement on a station's social media page is difficult but it is possible. The station could host the documents on a file hosting website and post a link to its bio or it could copy and paste the text of the documents into a post on its feed. The station should do this on a regular basis and at least annually. To meet good governance standards this should be a temporary solution until the station has a website. It is also a good idea for stations to have hard copies of policies available at the front desk.

Stations that are charities registered with the Australian Charities and Not-for-profits Commission (ACNC) must submit an annual information statement which includes details of a station operations and finances. The information which is published on the ACNC website on their Charity Register is a valid way to meet Code 2.2



publishing requirements, but note that all documents required by Code 2.2 are not required as part of ACNC reporting. It is best to also publish all documents on the station's website.

Link

- ACNC website – [Charity Register](#)

Guidance Note

Code 2: Governance

Code 2.3

- 2.3 We will have training in place to ensure that workers are aware of their Code and legal obligations.

The CBAA has prepared the Community Radio Broadcasting Codes of Practice (2025) eLearning course to help stations meet their Code 2.3 requirements.

Requiring that all staff and volunteers have completed the eLearning module will help to ensure that everyone at the station is aware of their Code and legal obligations. Those with particular duties at the station may need to have a deeper understanding of their Code and legal obligations in that area. For instance, community radio journalists should complete additional training on news and editorial standards, the Code 5 News and Journalistic Content Code, and their related legal obligations such as privacy law and defamation. Board members and station managers may require training on the provisions of the Code that relate to how the station operates.

Additional advice, training and support may be required for presenters who are broadcasting about serious geo-political events. This might include presenters of multilingual programs who in times of conflict and controversy may find themselves becoming a key source of news and information for their communities. It can be difficult to navigate the complexities of these situations and a good understanding of requirements for accuracy and not disseminating misinformation is very important. Under Code 2.3 it is expected that stations will have in place systems and processes for the identification of geo-political matters and the training of all impacted staff to ensure an understanding of their Code and legal requirements.

Training modules and guidance are available on the CBAA website at <https://www.cbaa.org.au/community-broadcasting/codes>.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.1

- 3.1 We must be able to demonstrate our understanding of our community interest.

A 'community interest' is a common interest shared by a group of people in a community that a station has identified on their licence. A community interest may be general in nature (e.g. representing the community's needs within the geographic area of a licence) or it may be specific (e.g. representing the needs of the First Nations community within a licence area).

Stations should be able to show active engagement, awareness of local issues, and a commitment to representing diverse voices through listener surveys and other kinds of feedback, local programming about local issues, partnering with local organisations and offering training and mentorship programs.

Licensees should keep records of activities that show community interest. Records might include: screenshots, copied text, meeting minutes, copies of forms and photos of events. These can help stations demonstrate the steps that have been taken to understand their community's needs and expectations and the changes they have made to their operations or programming in response.

This can help a station to justify its choices particularly in the case of non-local content. For example, a station might show that it is meeting the needs of its community by keeping feedback requesting more popular country music songs or a particular program by an American Christian Broadcaster or an in-language program from overseas. The station can then show that it is balancing material of local significance requirements with the needs of its community and its ability to remain commercially viable.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.1

- 3.1 We must be able to demonstrate our understanding of our community interest.

List of actions

A community radio station can demonstrate its understanding of its community interest through a range of practices that showcase active engagement, awareness of local issues, and a commitment to representing diverse voices. Stations should not feel like they have to put in place every idea on the list but be able to demonstrate regular ways of seeking to understand its community interest.

1. Community consultation and engagement

- **Surveys and feedback:** Conduct regular surveys, focus groups, or informal polls to gather suggestions and feedback from listeners about what content resonates with them, what issues matter most, and how the station can improve. This shows that the station values community input and is willing to adapt to better meet local needs.
- **Public forums:** Host open forums or town hall meetings to discuss station programming and encourage dialogue with the community. Allow the community to voice concerns, suggest new shows, or provide feedback on existing content.
- **Listener contributions:** to reflect diverse interests and voices, provide opportunities for community members to contribute content, whether through guest spots, interviews, user-submitted stories, song requests, text lines or shout outs.
- **Encourage community participation in program provision:** Broadcast announcements inviting program proposals and speak to local individuals and community groups about providing programs. Periodically analyse program schedules to ensure an adequate representation of locally produced programs.

2. Local stories

- **Hyperlocal programming:** Produce and broadcast programs on local issues, events, culture, individuals.

- **Community stories:** Highlight community initiatives, local groups, artists, and leaders. Run segments or series that discuss local topics such as housing, education, or health services.
- **Talk shows and call-ins:** Host live shows that tackle current events and local issues, allowing community members to call in and share their opinions to encourage direct engagement with listeners.

3. Inclusive and representative programming

- **Diverse voices:** Ensure station content reflects the community's diversity such as different cultural, linguistic, and age groups through targeted programming and outreach to underrepresented groups.
- **Language:** Consider languages other than English spoken in the station's local area and reach out to community groups to seek volunteers to develop multilingual programs.

4. Partnerships with local organisations

- **Collaborative projects:** to build community and strengthen relationships to local stakeholders, partner with local schools, non-profits, cultural organisations, community groups and services to co-produce content and cover local events.

5. Training and capacity building for the community

- **Volunteer and training programs:** to empower community and encourage diverse perspectives, offer training opportunities for community members to learn about radio production, journalism, or technical skills.
- **Youth engagement:** Create internship or mentorship programs for young people interested in media to demonstrate the station's commitment to the future of the community and help build younger audiences.

6. Data-driven understanding

- **Demographic research:** Use audience data to better understand the community's demographic makeup. Tailor programming based on this data, making sure to address both the broad needs of the general community and the specific interests of niche groups.
- **Community impact metrics:** Measure and report on the station's reach and impact within the community. This can include tracking listener engagement, growth in volunteer participation, or successful community campaigns launched via the station.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.2

- 3.2 The programs we broadcast must, collectively, reflect the needs and diversity of our community interest including through the provision of Material of Local Significance.

For a community radio station to ensure that its broadcast reflects the needs and diversity of its community of interest, including through the provision of Material of Local Significance, the station must focus on broadcasting content that resonates with the unique cultural, social, and economic characteristics of its community interest. There are lots of stations in the sector which will be confident that they are complying with this Code; others may be unsure. This guidance helps stations understand what compliance looks like.

According to the *Broadcasting Services Act 1992*, material is of local significance if:

- (a) it is hosted in the licence area; or
- (b) it is produced in the licence area; or
- (c) it relates to the licence area.

Material of Local Significance includes content like local news and current affairs; local music, arts and history; interviews with local figures; content in languages spoken in the licence area; local announcements; coverage of local events and outside broadcasts.

Community radio is a diverse sector, made up of broadcasters serving general location-based populations, or particular community interests within their broadcast area including First Nations communities, culturally and linguistically diverse communities, faith-based communities, youth and seniors' communities, the LGBTIQA+ community and people with a disability.

Each station is unique, set in a different community with different needs, different interests and different capabilities. But what unites all community radio stations is a community-centred approach. Stations are held and operated by the community and programming is made by and for the community.

The ACMA will consider a station's compliance with Code 3.2 on a case by case basis. There's no definitive minimum quota of Material of Local Significance for stations to broadcast. The kinds of things that would help a station meet their Code

3.2 obligations are: spoken word programming, local presenters engaged on air, number of regular local segments and engagement of people from the local community. Many stations won't have the capacity to broadcast Material of Local Significance 24/7, however too much reliance on automated playlists, overseas content, syndicated content or Australian content that is not specific to their community may mean a station is not meeting its requirements under Code 3.2. In general, the more 'live and local' programs a station has, the more likely it is that it is satisfying its requirements.

A station's ability to broadcast content produced in the licence area may be limited by volunteer availability due to the size and nature of their community. Volunteer availability may also be affected for periods by natural disasters or other external factors e.g. the COVID pandemic caused many stations to lose volunteers.

Though a station may supplement their programming with non-local content to stay on air, continuing efforts to involve community in broadcasting are vital to meet their Code 3.2 obligations.

The station should be taking steps to promote engagement and volunteering by raising awareness of opportunities to participate for instance, on-air, at community events and online. The station should also be encouraging community participation in their operations by having good governance practices and an effective and transparent committee structure, so the community can have a say in the running of the service.

Guidance Note

Code 3.2

Case studies: stations that meet Material of Local Significance requirements

Radio W

Radio W is a medium-sized regional station with a small group of committed volunteers:

- Hosted slots include a monthly interview with the Mayor, fortnightly interviews with the local environment group and the Aboriginal health service, ad hoc interviews with local theatre groups, arts groups, fishing club and other community groups to promote upcoming community events.
- Station attends local markets as volunteer capacity permits to broadcast live.
- Station runs a regular announcement seeking volunteers to fill broadcast slots and a sign up on their website.
- Periodically through the year the station holds open days for members to record station ID's, tour the studio and support new volunteers to join and pitch programs.
- Station supplements their local programming with programs from the CRN and automated playlists. These hours are replaced with local programs as volunteer capacity permits.
- Station is actively recruiting for local volunteers from the community of interest.

Radio X

Radio X is a large Metro station with lots of volunteers:

- Station has scheduled programming of content by or for their community 24/7.
- When hosts are sick, station has people fill in on air, on the rare occasion that no one is available they run an automated playlist.
- Station attends events in the local community, broadcasting from events and interviewing attendees.
- Station runs regular training sessions for new volunteers to join their programming team and works with many sections of the community to ensure the diversity of their region is and represented on air.

Radio Y

Radio Y is a small station serving a particular subsection of the community, with only a handful of local volunteers:

- Station has a number of regular local segments but struggles to maintain the volunteer numbers required to broadcast all day with local presenters.
- Station broadcasts from local events relevant to its community.
- Some volunteers from outside the licence area that are part of the community interest are engaged to host programs remotely and non-local



volunteers share news and weather relevant to the licence area, where no local volunteer can be found.

- Station is actively recruiting for local volunteers from the community of interest.

Guidance Note

Code 3.2

Case study: station not meeting Material of Local Significance requirements

Radio Z

Radio Z is a small station with only a handful of volunteers:

- Station relies on Spotify to select playlist of “popular” music. It is noted that broadcasting music from Spotify is contrary to Spotify’s Conditions of use which permits personal, non-commercial use only and prohibits the redistribution or transfer of Spotify content.
- Local musicians who submit their songs have their music sidelined to uncommon listening hours.
- Playlist is automated with station IDs voiced by actors outside the community.
- Volunteers propose to host programs and bring their own music but the offers are declined with no reasonable explanation.
- A small number of volunteers are the only people allowed to broadcast, they are not allowed to change the automated playlist and only host limited hours per day.
- Station has no strategy to recruit more local volunteers and does not actively engage with the community.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.2

- 3.2 The programs we broadcast must, collectively, reflect the needs and diversity of our community interest including through the provision of Material of Local Significance.

List of actions

The following kinds of content may help stations meet their requirements under 3.2:

1. Prioritise local issues

- **Local news and current affairs:** Regularly feature local news, weather updates, and traffic reports that are highly relevant to the community. This includes coverage of local council decisions, community events, and issues affecting local residents such as education, health, housing, and local economy.
- **Interviews with local figures:** To provide space for local voices and issues that matter to the community broadcast interviews with community leaders, local politicians, business owners and residents who are relevant to the station's audience.

2. Reflecting diversity in programming

- **Culturally specific programs:** Create content that reflects the cultural and linguistic diversity of the station's community. This could include programming in languages spoken within the station's community, or special segments that highlight cultural events and issues.
- **Inclusive storytelling:** Produce stories that represent various segments of the community, including minority or underrepresented groups such as First Nations peoples, culturally and linguistically diverse people, the LGBTQIA+ community and people with disabilities.

3. Hyperlocal focus

- **Local music and arts:** Promote local musicians, artists, and performers by broadcasting their work and interviewing them.

- **Community announcements:** Offer airtime for local organisations, clubs, and groups to share announcements, public service messages, or updates on community initiatives.
- **Local heritage and history:** Feature content that celebrates or educates listeners about local history, landmarks, and cultural heritage.

4. Engage community participation

- **Open mic and call-in shows:** Provide platforms where listeners can directly contribute to the conversation, express opinions, or share stories. This allows the station to reflect the community's views and ensures that content is relevant to listeners' immediate concerns.
- **Listener-led programming:** Encourage volunteers from different community groups to create or co-host shows. This allows for direct input from diverse segments of the community, ensuring the station reflects a wide range of interests and perspectives.

5. Adapt programming to address emerging community needs

- **Timely response to local issues:** When significant events occur in the local area (such as natural disasters, political developments, or community challenges), the station should adjust its programming to cover these events in depth. This might involve creating special broadcasts, holding live discussions, or partnering with local organisations to provide critical information.
- **Community initiatives and social campaigns:** Support and promote local campaigns or initiatives to strengthen the station's role as a community resource.

6. Partnerships with local organisations

- **Collaborations with NGOs and local government:** Work with local non-profits, social service providers, and government agencies to develop programming that helps raise awareness about important services, offers guidance on critical issues like health and safety, or encourages civic engagement.
- **Schools and tertiary institutions:** Collaborate with educational institutions to produce content that appeals to youth and educational segments of the community. This could involve student-run programs or content that discusses youth-focused issues and achievements.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.3

- 3.3 We must encourage and assist people in our community interest, including those who are not adequately served by other media, to participate in providing our service, prioritising the discussion of topics by those with relevant lived experience.

A community radio station can encourage and assist people in its community interest, especially those not adequately served by mainstream media, to participate in providing content by fostering inclusivity, accessibility, and prioritising voices with relevant lived experience.

For many stations it can be difficult to get people interested in being involved but the important thing is that the station is always welcoming of new people from their community and takes steps to get the word out to their community about how to get involved. Some ideas for things to do include: running announcements seeking volunteers, connecting with community groups, providing training and mentorship opportunities, holding open days, attending local events, providing a platform for community stories for instance through call-in shows and community panels, and ensuring that content reflects the diversity of the community by airing stories about local issues impacting underrepresented groups.

For more on First Nations engagement see the guidance notes for Code 7: First Nations Engagement and Programming.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.3

- 3.3 We must encourage and assist people in our community interest, including those who are not adequately served by other media, to participate in providing our service, prioritising the discussion of topics by those with relevant lived experience.

List of actions

The following steps may help stations meet their requirements under Code 3.3:

1. Create an open and inclusive environment

- **Invite participation from underrepresented groups:** Actively reach out to groups within the station's community that are often overlooked by mainstream media, such as First Nations peoples, culturally and linguistically diverse people, the LGBTQIA+ community and people with disabilities. Make it clear that the station welcomes their participation and values their perspectives.
- **Accessible studio and remote participation:** Ensure that the station's facilities are physically accessible for people with disabilities. Additionally, provide options for remote participation, such as phone-ins, pre-recorded segments, or online contributions, to make it easier for those who may face barriers to accessing the station in person.
- **Multilingual programming:** Offer opportunities for people to produce content in languages other than English, reflecting the diversity of your community's linguistic landscape.

2. Prioritise lived experience in programming

- **Focus on authentic voices:** When discussing community issues, prioritise the voices of those with lived experience. For example, if the station is discussing homelessness, ensure that people who have experienced homelessness are included in the conversation, either as guests, contributors, or program hosts.
- **Create thematic shows led by lived experience:** Develop shows that focus on particular issues, such as mental health, disability rights, or refugee experiences, and invite people with lived experience to lead or co-host those programs. This not only provides them with a platform but ensures the content is authentic and representative.

3. Provide training and mentorship

- **Radio and media skills workshops:** Offer free or low-cost workshops that teach radio production, presenting, editing, and journalism skills to members of the community, especially those from underrepresented groups. By equipping them with the necessary skills, you empower them to contribute content and share their stories.
- **Mentorship programs:** Pair experienced broadcasters with newcomers, particularly those from marginalised backgrounds, to guide them through the process of creating their own radio segments or shows. This mentorship builds confidence and ensures ongoing support.

4. Develop accessible pathways for contribution

- **Simplify the process of getting involved:** Create clear and easy-to-understand pathways for people to get involved, such as volunteer programs, open calls for contributors, or invitation-only production slots for community members with relevant lived experience.
- **Community content submission:** Encourage community members to submit content, whether as audio recordings, written scripts, or even informal interviews, through accessible online platforms or in-person at the station. This lowers the barrier to entry for those who might not have professional production experience.

5. Provide platforms for storytelling and dialogue

- **Storytelling series or segments:** Create segments where community members share their own stories and experiences on topics that matter to them, whether through interviews, personal narratives, or discussion panels.
- **Call-in shows and listener-led segments:** Host live call-in programs where community members can participate in discussions on important topics, share their opinions, or tell their stories. These listener-led segments ensure that the content reflects the concerns and interests of the community.
- **Community panels:** Organise on-air panels made up of individuals with direct experience related to the topic being discussed.

6. Outreach and partnerships with local organisations

- **Partner with local groups:** Collaborate with local non-profits, cultural organisations, and advocacy groups that work with underrepresented populations. These groups can help connect stations with individuals who have lived experience and can support them in sharing their stories on-air.
- **Host community forums:** Regularly organise community forums where local residents can gather to discuss important issues. Broadcast these forums or

record them for on-air playback, ensuring that voices from all parts of the community, especially those less often heard, are represented.

7. Empower volunteers with leadership roles

- **Volunteer-produced programming:** Encourage volunteers to lead their own shows. Give them creative control over their content while offering guidance and support. This hands-on role encourages deeper involvement and ensures a wide range of perspectives on-air.
- **Leadership development:** Offer leadership development opportunities for volunteers and community contributors, helping them not only participate but also take on decision-making roles within the station, ensuring representation at all levels.

8. Flexible programming to address local and emergent issues

- **Rapid-response programming:** When significant events occur that affect particular community groups (e.g., natural disasters, political developments, or social issues), quickly adjust the programming to cover these events. Reach out to individuals with lived experience of those events to contribute content or provide commentary, making sure their perspectives are at the forefront of the discussion.
- **Community-driven programming schedules:** Allow community members to propose topics and content for discussion on the station.

9. Promote diversity

- **Content that reflects the diversity of the community:** Ensure the programming reflects the diversity of the community by airing content related to festivals, events, and celebrations. Invite community members with lived experience to co-produce or host the content.
- **Respond to community issues:** Partner with individuals and groups directly impacted by community issues to ensure that their lived experience guides the discussion and solutions presented.

10. Make participation fun and rewarding

- **Create a sense of belonging:** Build a welcoming and fun atmosphere at the station that encourages community members to stay involved. Regularly celebrate the contributions of volunteers and provide recognition for their work, fostering a strong sense of belonging.
- **Incentives for participation:** Provide small incentives, such as gift cards, station merchandise, or public recognition, to those who contribute content or help with station activities. While this isn't a requirement, it can encourage more people to participate, especially those who may feel hesitant.

11. Provide content that serves as a voice for the unheard

- **Champion unheard voices:** Make it a mission of the station to advocate for the inclusion of voices not commonly heard in mainstream media. Ensure the station's content consistently reflects issues, stories, and perspectives that may be ignored elsewhere.

12. Make it clear how to get involved

- **Get the word out:** Stations might run a regular announcement seeking volunteers and directing them to more information. The station website might include a volunteering page with information about how to get involved and a contact form or contact details. The station might attend local events to offer information about volunteering and hold open days to encourage the community to tour the studio and get involved.

Guidance Note

Code 3: Diversity, Independence and Our Community

Code 3.3

- 3.3 We must encourage and assist people in our community interest, including those who are not adequately served by other media, to participate in providing our service, prioritising the discussion of topics by those with relevant lived experience.

Tips from community broadcasting stations

- The most important thing is to be open and welcoming to new volunteers and presenters all the time.
- Reaching your community takes trial and error and keeping on trying.
- Attending events and engaging with our community in our outside broadcast van helps us be seen by and connect with our community and spread engagement through word of mouth.
- Our university-facilitated internship program works really well and most of our volunteers stay on after the program ends.
- Find creative ways to engage your community, for example we reach a lot of new young people through mini golf at a careers expo stall.
- Facebook is a really good tool for engagement with our audience.
- Listeners and community can send music to the station via email which we can play on air or put in our library.
- We give voice to Indigenous people in our community through interviews with local artists, musicians, actors and dancers.
- We engage with our community through comments that come in while on air that we can directly engage with in real time.
- We find it difficult to maintain our volunteer broadcasters. Often people are in transitory phases in their lives and there's not much we can do about it when they come and go. We try to offer training and support to encourage new people and retain the volunteers we already have.
- We try to make sure there's someone in the station when volunteers come in to do their shows so that people aren't coming into an empty building.
- At a minimum, stations should get the message out to their community that: 'We are a community station and you can get involved! Here is a way of getting in touch.'

Guidance Note

Code 4: Material Not Suitable for Broadcast

Stations need to be mindful that the role of the community broadcasting sector is to unify not divide our communities. As our sector's Roadmap 2033 affirms, our values are to work for community wellbeing and have a positive impact on people.

Stations should therefore always exercise special care when making a decision to broadcast material that may cause harm and offence. Code 4 is designed to ensure that material that stations put to air meets community expectations and minimises potential harm or unnecessary offence to audiences. Code 4.1 lists the types of material that are generally not acceptable by community standards.

Guidance Note

Code 4: Material Not Suitable for Broadcast

Code 4.1 c) and d)

4.1 We will not:

- c) promote or encourage harmful or excessive gambling;
- d) promote gambling, gambling information (other than prevention or support information) or gambling live odds immediately before, during, or immediately after sporting events;

Community radio stations in Australia, as part of their broadcasting obligations, are required not to promote or encourage harmful or excessive gambling. This regulation aims to ensure that stations are socially responsible and do not contribute to problems like gambling addiction or financial distress in their communities. The line between what is permissible and what is not can be understood through the following guidelines:

What community radio stations can do:

Broadcast informational content about gambling:

- It is acceptable to air factual content that provides information about gambling, such as how certain types of gambling work, the laws surrounding gambling, or discussions on the role of gambling in society. However, this content must be neutral and not framed in a way that encourages participation in gambling activities.
- News reports on gambling-related events (e.g., horse races, lotteries) are permitted, but they should be handled carefully to ensure they don't glamorise or encourage gambling.

Discuss gambling issues:

- Stations can produce programs or segments that discuss the social, economic, and personal impacts of gambling, especially if the focus is on raising awareness of problem gambling and providing information on where to seek help (such as promoting resources like gambling help services).
- Interviews with experts on gambling addiction, gambling regulation, or personal stories of overcoming gambling problems are examples of educational or socially constructive content.

Promote responsible gambling messages:

- Stations can air public service announcements (PSAs) or sponsored content that promotes responsible gambling practices, provided these messages are

clear about the potential harms of gambling and offer advice on gambling in moderation.

- Programs might also include information on how to gamble responsibly, such as setting limits on spending or time, as long as it is done in a non-encouraging, educational context.

What community radio stations cannot do:

Encourage participation in gambling:

- Stations cannot promote or encourage gambling in a way that suggests it is a desirable or exciting activity. This includes programs, promotion, or announcements that glamorise gambling, make it seem like an easy way to make money, or downplay the risks involved.
- Direct calls to action that encourage listeners to participate in gambling activities, such as saying "Go out and place a bet" or "Join us at the casino for a chance to win big," are prohibited.

Broadcast gambling promotion (in certain contexts):

- Promotion of gambling products or services that promote excessive or harmful gambling is not allowed. This includes promoting casinos, online gambling platforms, sports betting agencies, or similar services if they are framed in a way that encourages participation.
- Even if a gambling-related service (e.g., a local lotto or sweepstakes) sponsors the station, any sponsorship broadcast must not glamorise gambling or suggest that gambling leads to success or happiness.

Promote gambling events without a responsible gambling focus:

- The promotion of gambling-related events such as poker nights, betting competitions, or lotteries must not focus solely on the gambling aspect or encourage people to gamble excessively. If gambling-related events are discussed, it's crucial that the station includes messages about responsible gambling or provides harm-minimisation information.

Downplay the risks of gambling:

- Material broadcast should not trivialise the risks associated with gambling, such as addiction or financial loss. Stations cannot broadcast content that makes light of gambling losses or encourages the idea that gambling is harmless entertainment without consequence.

Feature testimonials or success stories of gambling wins:

- Broadcasting personal stories or testimonials that celebrate gambling wins without discussing the risks involved can be seen as promoting gambling. These kinds of narratives may encourage listeners to gamble excessively in the hope of achieving similar success.

Where is the line?

If the station broadcasts content that directly or indirectly encourages listeners to engage in gambling (through excitement, promise of financial reward, or social pressure), that would be crossing the line.

Content that provides balanced, factual information or highlights the potential harms of gambling (without glamorisation) would be considered appropriate and is in line with community broadcasting regulations.

Examples of what is permissible vs. not permissible:

Permissible:

A segment discussing gambling addiction in the community, where experts explain the warning signs and offer resources for those affected by problem gambling.

Not permissible:

A show where the host casually promotes gambling by highlighting their personal betting wins or discussing the thrill of gambling without also discussing the risks involved.

Permissible:

Announcing community-run charity raffles or low-stakes bingo nights, as long as the focus is on the charitable aspect and not the gambling.

Not permissible:

A broadcast segment encouraging listeners to bet on sports, especially if it highlights only the potential for winning and not the risks of losing.

Best approach for community radio stations:

Regularly monitor content:

Have clear editorial guidelines for presenters, producers, and volunteers to ensure that content complies with gambling restrictions. Regular reviews of content related to gambling should be conducted to ensure compliance.

Include responsible gambling messaging:

If gambling-related topics are discussed, stations should include disclaimers or messages that encourage responsible gambling practices and provide resources for problem gambling support.

Collaborate with responsible gambling organisations:

Partner with organisations that work on gambling harm minimisation to air PSAs or segments about the risks of gambling and how to get help.

Training for presenters:

Ensure that the everyone working on material broadcast by the station understands where the line is when it comes to gambling content and broadcasters are trained to talk about gambling responsibly without promoting it.

Guidance Note

Code 4: Material Not Suitable for Broadcast

Code 4.1 f)

4.1 We will not:

- f) present suicide as a solution to problems or broadcast details about suicide like method or location;

Suicide is a complex issue and broadcasters are faced with the questions about whether to report and how to report. Community broadcasters can play a powerful role in raising awareness and about suicide prevention, however, stories about suicide also have the potential to do harm. This Code reinforces the need to proceed with caution when considering reports about suicide attempts and deaths. Code 4.1 f) prohibits broadcasters presenting suicide as a solution to problems and the details about suicide such as method and location.

[Mindframe](#) have a suite of resources to assist journalists and broadcasters communicate about suicide. These include:

- [Reporting suicide and mental ill-health: a Mindframe resource for media professionals](#)
- [Guidance for language and discussing method and location](#)
- [Guidance for social media](#)

Guidance Note

Code 4: Material Not Suitable for Broadcast

Code 4.2

4.2 The application of 4.1 is guided by the context of the material. Material that is likely to cause harm and offence must be justified by context, and adequate protective measures provided. Code 4.1 does not prevent the legitimate presentation of factual material, a fair report of, discussion or a fair comment on, a matter of public interest or material that is humorous, satirical, artistic or dramatic in nature. When assessing context, including in relation to the assessment of complaints, factors to be considered will include the nature of the content including its genre, subject matter and editorial purpose, and our community interest.

Code 4.2 recognises that sometimes there will be reasons to broadcast what would otherwise be regarded as unsuitable material in Code 4.1, and that the context in which material is broadcast is relevant to whether or not it can be put to air.

These reasons include:

- where it is clear that the station is *not* recommending or endorsing the harmful or offensive material, but merely informing listeners that it has been said where there is a public interest reason to do so.

For example:

- “fair report” in this context generally means a summary of a proceeding or event which intends to honestly convey to the audience what they would have seen or heard had they been present e.g., a summary of a court hearing or parliament. To be fair, it must not exclude important information that would change the perception what actually happened. For example, if during parliament a politician called another politician an embezzler, then retracted it and apologised, it would not be a “fair report” to report the accusation and not the retraction/apology;
- “fair comment” includes an honest opinion about a factual matter, not something made up;
- when used in both of the above context, “fair” doesn’t refer to the harmful or offensive content (which may itself be unfair or prejudicial), but to

whether the broadcast fairly represents something that was said or happened;

- it has to be on a matter of *public interest*, so would not include, for example, information about someone's private life (unless for example, that exposed a hypocritical stance taken by a public figure on a public issue) or rumour or gossip.

The exception also applies in the context of recognised situations (humour, artistic or dramatic material) where freedom of creative expression overrides the risk of harm or where humour or satire is, for example, designed to expose prejudice, rather than support it. A racist joke by a presenter will not attract the protection of Code 4.2, but a station's accurate report which includes and contextualises a public figure's offensive statements will likely be protected.

Guidance Note

Code 4: Material Not Suitable for Broadcast

Privacy

Code 4.4 and 4.5

- 4.4 We will not broadcast the words of an identifiable person or material that relates to a person's personal or private affairs or invades a person's privacy or intrudes into their private life, unless:
- a) there is a clear public interest reason for the material to be broadcast; or
 - b) the person has provided informed consent, whether explicit or implicit, for the material to be broadcast (or in the case of a person under 16, a parent or guardian has given implicit or explicit consent).
- 4.5 We will exercise special care before using material relating to a child's personal or private affairs in the broadcast of a report of a sensitive matter concerning the child

Community broadcasting is all about supporting our communities of interest, not seeking to intrude on them. Codes 4.4 and 4.5 are focused on ensuring that other than in most necessary circumstances, stations will steer clear of coverage that involves people who are vulnerable due to their circumstances or age.

Code 4.4 requires stations to consider a clear public interest reason to broadcast private material about a person or the person has provided informed consent. It is best practice to have written consent from interview subjects.

When considering whether someone has given consent, stations need to be satisfied that the person has been properly informed of what is to be broadcast and appreciates the consequences of airing private information about themselves.

Informed consent means that the station has been upfront about how the person will be involved in their broadcast – for example, the nature and purpose of the program, why they have been asked to contribute, what is likely to be covered, whether it is live or pre-recorded, whether others will be present and whether the program will be edited.

Stations should also consider if the person has the capacity to consent – for example, if they appear to be in a vulnerable personal or health situation, they may not fully understand what they are agreeing to.

While the Codes allow for the person's consent to be explicit or implicit, it is good practice for stations to get a written or recorded release where possible so that there is no doubt, recognising that in some cases – for example during a bushfire or flood emergency - this may not be practical.

Stations should also ensure they have complied with all legal obligations around identifying children and victims of crime. The laws on what you can and can't report vary from state to state, so it is important to check what applies to your station. If a case is before a court, you may find helpful information on reporting restrictions on the court's website. It is always best to be cautious as there can be major penalties for contempt of court or breaching restrictions set out in legislation.

While a person may have given consent at a particular time, it may not be appropriate to identify them in the future. As an example of this, the case studies for Code 5(1)(f) guidance have removed the names of the victims involved in the incidents mentioned. Two are people who suffered harm from being wrongly identified. The other is a young child whose name was made public when they were kidnapped and later found. All were victims and there is no ongoing public interest in their name being discussed. As in these examples, the rights of victims to return to their former privacy should be considered. This may not be an issue for those seeking to remain in the public eye, for example people who are trying to raise awareness of their situation or a cause.



Guidance Note

CODE 5: News and Journalistic Content

Gaining and maintaining the trust of listeners is critical for community broadcasters. This is especially important where stations broadcast news and journalistic content which their communities need to rely on.

Audience and community trust is hard won and easily lost. These Codes reflect the types of special care to be taken around important and newsworthy issues, to ensure that stations continue to meet community expectations.

Guidance Note

CODE 5: News and Journalistic Content

Code 5.1 (b)(i)

When broadcasting news and journalistic content we must...

(b) ensure that:

(i) all factual material is presented accurately;

Code 5.1 (b) (i) requires all factual material in news and journalistic content to be presented accurately. This means that the information broadcast must be thoroughly checked to ensure that it is accurate. It is important for community journalists and all broadcasters who might deliver some form of news and journalistic content to understand this obligation. It is also important for the station to have oversight of any program which includes news and journalistic content. The requirement for accuracy applies not only to dedicated news and journalistic programs but will also apply to programs which cover some news or journalistic content. For instance, a foreign language community program must comply with the accuracy requirement when talking about news from home. The accuracy requirement at 5.1 (b) (i) helps to ensure that community radio is a trusted source of information for all the communities we serve.

Guidance Note

CODE 5: News and Journalistic Content

Code 5.1 (b) (ii)

When broadcasting news and journalistic content we must...

(b) ensure that:

(ii) all News Content is presented with due impartiality;

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

While the Codes require all factual material to be presented accurately, there is an additional standard for “News Content”: it must be presented with “due impartiality”.

“News content” is defined as above in Code 5(b) (ii), which applies only to the named categories and does not apply to, for example, general interest, current affairs or opinion-based programs.

“Impartiality” generally means providing an objective view of the facts and perspectives in a news story. This may include clearly separating opinions from facts, so that the foundations of the stories covered in News Content can be easily understood by audiences.

“Due” is an important qualification which means that material should be presented in a way that is appropriate to the content and context of the particular broadcast of News Content. Each story needs to be considered in its own circumstances, including the nature of the content, the type of program, its intended audience, how contentious the issues are and the range or diversity of informed perspectives on contentious issues.

While in many cases, it will be appropriate to broadcast a range of perspectives on an issue, “due impartiality” does *not* mean every view has to be given equal time or every argument or fact has to be represented.

For News Content involving facts that are not contested, the station may apply “due impartiality” to allow greater focus on perspectives that are most relevant or of interest to the intended audience. For example, a First Nations station covering the destruction of a sacred site may choose to focus primarily on the impact of the event on the First Nations community.

Where News Content is highly contentious, “due impartiality” will require the station to take special care to ensure that the news story represents a diversity of relevant or authoritative perspectives. For example, when covering significant, complex or fast-moving geo-political conflicts which affect different parts of the Australian community:

- where practicable and appropriate, a range of competing fact-based perspectives may be included in the same program;
- otherwise, it may be important for audiences to be presented with those perspectives over time and across a series of broadcasts.

If there is significant authoritative evidence supporting an issue (for example, in a public emergency), the perspectives of respected sources and prevailing consensus should be given greater prominence, weight and time. Due impartiality does not require stations to air questionable facts or marginal or unsubstantiated opinions.

Given the potential for harm when broadcasting contentious material, stations making editorial decisions about what “due impartiality” means on a particular issue should be mindful of impact of what they put to air and the risk of inflaming prejudice towards or abuse of particular communities or their members. See also the guidance for Code 5.1 (f).

The ACMA also publishes the outcomes of investigations into Code breaches by broadcasters and these may cover similar concepts. The investigations can be found here: <https://www.acma.gov.au/broadcasting-compliance-and-investigations>

Links:

- [ACMA investigations](#)

Guidance Note

CODE 5: News and Journalistic Content

Code 5.1 (f)

When broadcasting news and journalistic content we must...

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

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

Community broadcasters play an important role in fostering harmony and inclusion in their communities. While freedom of expression is an essential element of a healthy democracy and public debate, an equally important element is access to trustworthy information. Australians are increasingly concerned about the spread of unreliable material, in some cases amplified by generative artificial intelligence, and the damage it can do to the Australian community.¹

Community broadcasters have the ability to counter the spread of misinformation and disinformation by ensuring that they only use trusted information and legitimate sources and carefully check contentious or controversial stories before broadcasting them.

When reporting on contentious or controversial matters, stations should follow the evidence available at that point in time, including principal relevant perspectives. Where possible, they should focus on information provided by highly regarded institutions and sources – for example, authoritative public bodies, universities and research centres, and established fact-checking websites.

It is always preferable to start with the original source for information (e.g. a government media release about a public health emergency) rather than repeating or adding to a third party's interpretation of what was said.

Code 5.1 (f) covers not only reports about public issues, incidents and events, but also requires stations to take care when identifying individuals caught up in controversial events.

For example, in 2021, local Indigenous community radio broadcaster Ngaarda Media broke the story that a national commercial television broadcaster had wrongly identified a man as having abducted a 4-year-old girl in Carnarvon, Western Australia. This misinformation, which was widely disseminated in national media and online, led to the man being harassed and hospitalised. Through local knowledge and community connection, Ngaarda Media were able to correct the record and give a voice to the wrongly accused man. The wrongful identification and subsequent harassment of a young man as a suspect in the 2024 Bondi Junction shopping centre killings is another well-known example based on the spread of disinformation.

The types of material which have the potential to cause “serious harm” may include:

- harm to the operation or integrity of an Australian electoral process
- harm to public health in Australia
- vilification of a group in Australian society distinguished by race, religion, sex, sexual orientation, gender identity, intersex status, disability, nationality or national or ethnic origin, or vilification of an individual because of a belief that the individual is a member of such a group
- intentionally inflicted physical injury to an individual in Australia
- imminent damage to critical infrastructure or disruption of emergency services in Australia
- imminent harm to the Australian economy.

Guidance Note

CODE 5: News and Journalistic Content

Code 5.1 (h)

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

Community broadcasting listeners rely on stations as a source of important news and journalistic content that directly affects them, so addressing mistakes is critical to maintain their trust. To comply with our Code obligations and potentially avoid escalating a dispute, stations should follow the guidance in the Complaints Toolkit.

It is best for stations to acknowledge and correct or clarify significant errors of material fact as soon as reasonably possible. Doing so helps stations reduce the risk of wasted time, effort and even legal costs if the dispute escalates.

A “significant error of material fact” is one that is relevant and central (rather than trivial or incidental) to the topic being broadcast.

It may be something included in or omitted from the broadcast. It does not include opinion (unless the opinion repeats the erroneous material fact).

To comply with Code 5.1 (h):

- Station policies should include a process for dealing with significant errors of material fact, with clear responsibilities and actions.
- Stations may decide that any or all of the following corrective actions are appropriate, depending on the circumstances:
 - o **Corrections** are used where a fact is clearly wrong and/or would mislead the audience - e.g local traffic has increased by 50% (when it is 5%) or a significant material has been omitted – e.g saying a local doctor had been charged with assault but omitting that they were later acquitted.
 - o **Clarifications** are used where content is ambiguous, fails to explain context or could be seen to be misleading e.g. “The Mayor is considering her future after it was revealed that secret recordings were made in her office” could have several meanings: e.g. she illegally made the recordings or they were surveillance tapes revealing misconduct or she was taking responsibility for a management failure.

- o **Removal of content**, whether temporary or permanent, may be appropriate for a serious issue, including one which may result in a legal action, or if an apology is warranted.
- In a “timely manner” means that once the significant errors of material fact are identified, they should be addressed at the next practical opportunity on the program/platform most likely to reach the original audience.
- Whichever corrective action is chosen:
 - o it should be communicated clearly, not hidden;
 - o if it involves harm or offence, it should avoid repeating the original material;
 - o if too complex to deal with on air, it should refer to material on the station's website; and
 - o if an apology is needed, it should generally be at the same time as the correction/clarification.
- Corrections and clarifications should be clear and specific. For example:
 - o On yesterday's program about local traffic issues, we mentioned that traffic had increased in the last year by 50%. In fact, the correct figure is 5%.
 - o In this morning's bulletin we reported that Doctor Taylor had been charged with assault. We should have informed listeners that the charges were subsequently dropped. We apologise for the error.

While not required by the Codes, stations may choose to correct insignificant errors (e.g spelling, time, errors involving no harm or reputational damage), as part of building trust and engagement with their communities, including on the station's online platforms.

Prevention is always better than cure: to help avoid the above issues, stations should have an editorial process for fact-checking significant stories and discussions before they go to air and ensure anyone involved in putting programs together has had training around Codes compliance and editorial standards. And keep the Complaints Toolkit and Code 10.9 handy!

Guidance Note

CODE 5: News and Journalistic Content

Code 5.1 (j)

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

Audiences who listen to a station expect to be able to trust what they hear and that it is presented with integrity and independence from outside influence.

A conflict of interest exists where someone's personal, financial or professional interest interferes with their ability to present news, stories or any other material to their listeners. The conflict can be actual or perceived - that is, reasonable people would likely think you are affected by it even if you don't think you are.

Examples of a conflict of interest may include:

- Financial conflict of interest – for example when a presenter, their partner or a close relative or associate could financially gain from something being broadcast;
- Personal conflict of interest – for example where a reporter has a personal relationship with the subject of their story;
- Political conflict of interest – for example where a political affiliation can cloud a presenter's position or be perceived by audiences to influence what they say
- Professional conflict of interest – for example where a presenter has a professional relationship with someone appearing on their program.

Avoiding conflicts of interest is particularly important when presenting news and journalistic information as this can undermine audience trust in the program and the station. But the principles can apply across all types of broadcasts.

The good news is that the Codes allow for conflict of interest situations in radio broadcasts, as long as the person "adequately" discloses them to listeners. Once that happens, it's up to listeners to make up their minds about what was presented and there is no chance of them being misled. As above, this may not be appropriate in a news or journalistic story.

While there is no strict formula for "adequate disclosure", the common sense approach is to be clear and up front. For example:

- I'm delighted to be talking to publican Mardi Gars today about this weekend's music festival. I sometimes play gigs at Mardi's pub and appreciate her amazing knowledge of new music.



- Hi everyone and today we are talking to the three candidates in our upcoming local government elections. Full disclosure, I was a candidate myself in the last election for the Tea Tree Party which isn't running this time. Today is all about hearing about what each of our candidates is promising to deliver for this local area.

If you have declared a conflict of interest, you are still obliged to ensure it doesn't get in the way of you doing your job, so it is important to be conscious of how you present material - for example, the way in which you ask questions and how you allocate time to different sides of an issue that you have an interest in.

Guidance Note

Code 6: Emergency Broadcasting

- 6.1 Where we offer emergency broadcasts, we will have procedures in place to enable appropriate local emergency broadcasts.
- 6.2 Where we offer emergency broadcasts, those broadcasts must include:
- a) accurate, reliable, and timely factual information; and
 - b) locally relevant information, to the extent possible.
- 6.3 Where possible, we provide emergency broadcasts in the main languages other than English spoken in our local area.

Community broadcasters can play a vital role in communications during emergencies, by providing their communities with up-to-date information that is hyperlocal and responsive. Our stations provide their communities with factual, real-time, local information that is in-language and in the appropriate community context.

This guidance material contains general information only and is not professional advice. This information is to be used at stations' and broadcasters' own discretion and risk.

Complete CBAA's Emergency Broadcasting Course as the first step

The [CBAA's Emergency Broadcasting Course](#) is a comprehensive resource for all stations interested in emergency broadcasting. We encourage all stations interested in emergency broadcasting to complete the course first and then to read this guidance material. The course provides critical context and ensures stations are prepared to effectively use the guidance in this resource.

Plan before an emergency and assess station risk

Stations need to prioritise planning before facing an emergency. It is important to proactively decide the station's role before, during and after disaster rather than reacting under pressure.

Risks involved in emergency broadcasting

Emergency broadcasting is valuable and rewarding but carries risks such as resource strain, potential trauma for volunteers, and the high stakes of delivering accurate information. Stations must carefully consider these risks and decide their level of involvement in advance.

Developing a plan

Stations need a clear plan covering:

- When to start, continue, and stop emergency broadcasts.
- Contingencies for technical disruptions, such as loss of power or transmitter access.
- Consistent messaging across programs to avoid listener confusion.
- Highlight the importance of volunteer wellbeing during prolonged emergency coverage.

Assessing the community's risk profile

Stations should identify the most likely emergency events in their area based on historical data and Local Emergency Management Planning processes.

Guidance Note

Code 6: Emergency Broadcasting

Code 6.1

- 6.1 Where we offer emergency broadcasts, we will have procedures in place to enable appropriate local emergency broadcasts.

6.1 Appropriate local emergency broadcasts have procedures in place

Station boards and/or management determine the level of involvement in emergency broadcasting for their station. Key considerations may include:

- The number of volunteers willing to broadcast and their expertise during a time of crisis
- Whether emergency broadcasting is a priority
- Whether a specialist station that does not broadcast much talk content can provide emergency broadcasting throughout the emergency
- If the broadcast area is already well served with emergency information
- Back up technology for broadcast

Preparing to broadcast during an emergency

A selection of example procedures and policies listed below may be a helpful starting point for preparing to broadcast during an emergency.

For a station

- If impacted – develop a station emergency plan that includes an essentials list of items, contacts and actions if the station faces crisis
- If impacted – develop an emergency plan for each individual volunteer working during a disaster. See the Australian Red Cross' [Rediplan](#)
- Confirm Volunteer Agreements are signed for each spontaneous and ongoing volunteer working at the station
- Confirm understanding about the station's obligation to volunteer safety. See the [National Volunteering Guide Part 4: Volunteer Safety](#) by Justice Connect
- Confirm your station has adequate insurance coverage to protect it from liability. Confirm your station has volunteer personal accident insurance to protect volunteers.
- Sign up directly to relevant Government agencies to receive official warnings
- Confirm an approach to emergency broadcasting that considers other networks or agreements as an official emergency broadcaster
- Offer training to volunteers on appropriate emergency broadcasting
- Share mental health support services with volunteers
- Build awareness and prepare any back up technology, generators or UPS

- Set up ABC rebroadcast (should the station wish). Find general alerts on <https://www.abc.net.au/emergency>

For a presenter

- Confirm the presenter understands and has signed their Volunteer Agreement
- Develop a presenter-in-emergency procedure that sets out when to begin presenting after an official warning
- Understand emergency broadcasting should be triggered by an official warning when lives and properties are threatened. Fire warnings are issued by state and territory fire agencies, weather related warnings are issued by State Emergency Services and the Bureau of Meteorology. More information can be found at [CBAA's website here](#).
- Confirm the type of emergency broadcasts on radio and social media, how and when to present on-air
- Understand the station's expectations and safety plans regarding emergency broadcasting
- Be aware of any available support services

During an emergency

For a broadcaster

- Broadcast emergency broadcasting stings. The CBAA has produced a set of 4 alert stings which should be played before giving warning information on radio. Members can access the stings on the [CBAA's website here](#).
- Be aware of when to commence and stop on air updates and broadcasts

In recovery

Broadcasters

- Confirm an approach to designate broadcasts each day to community recovery information

Station:

- Review processes and updates as needed
- Audit damages to equipment or premises
- Share support resources, services and contact information to volunteers and staff

There are different types of emergency broadcasters: Official Emergency Broadcasters in Victoria

Radio stations in Victoria including some community stations, signed agreements with Emergency Management Committees to become an Official Emergency Broadcaster. This is a formal arrangement and includes a signed Memorandum of Understand (MoU) which details the expectations of the role.

Emergency Broadcasting in other states and territories

Currently there are few options outside the state of Victoria for community stations to be officially recognised as emergency broadcasters. Stations can begin emergency broadcasting without the 'official' title, they just will not be able to hold the title of an Official Emergency Broadcaster.

Stations that supply some information without official agreement are generally referred to as 'republishers' or 'rebroadcasters'. In emergencies, warnings republishers play an important role to convey official information. Warnings republishers may seek to republish and tailor warnings and information for their specific audience and community. They benefit statutory providers by extending reach of warning messages and access to larger audiences; reduce impact on emergency service agencies and help impacted people confirm the validity of information.

Guidance for Warning Republishers

The Australian Institute for Disaster Resilience has published [*Warning Republishers: Companion to Public Information and Warnings Handbook \(2021\)*](#) that sets out guidance on republishing warnings during emergencies for emergency broadcasters. It provides guidelines for warnings republishers including:

- Check the warning is current and is republished in a timely manner
- Maintain the intent of a warning, this includes both the wording and spatial representation of an official warning
- Take care to correctly replicate or reproduce maps and images
- Include the original warning's source, date and time of publication
- Republish any revisions or updates to the original warning, including de-escalation of warnings informing the community the emergency has eased or ceased
- If the warning is from an unofficial source, clearly indicate the source and that it contains unverified information

Guidance Note

Code 6: Emergency Broadcasting

Code 6.2

6.2 Where we offer emergency broadcasts, those broadcasts must include:

- a) accurate, reliable, and timely factual information; and
- b) locally relevant information, to the extent possible.

All information used for emergency broadcasting must be:

- accurate, reliable, and timely factual information; and
- locally relevant information, to the extent possible

For emergency broadcasting, broadcasters shall provide relevant information that is consistent, accurate, short and easy to understand. Broadcasting in the language of a station's local area is important and should be prioritised for messaging to reach communities.

The CBAA worked with the ABC to create resources to support CBAA members when emergency broadcasting. These resources set out when to begin emergency broadcasting, emergency broadcasting stings stations can use before giving warning information on radio and how to broadcast alerts on radio and social media with an example of a warning. This resource can be found on the CBAA's website [here](#).

Factual information for broadcast to the community may include:

- Messaging and advice from government emergency services and agencies including State and local fire services, SES and police
- Data from government spatial mapping websites such as Fires Near Me
- Messaging from local community services such as a local Australian Red Cross branches or local government resilience networks
- Updates and warnings about local information including live traffic updates
- Factually relevant local information by validated sources
- Eyewitness and talkback reports

Unless the law provides otherwise, CBAA does not have any liability to any person arising from a station's use of or reliance upon this guidance.

Guidance Note

Code 6: Emergency Broadcasting

Links: Resources for stations

Training for community broadcasters

- **CBAA Online Emergency Broadcasting Course**
This course provides knowledge, understanding and competency to be better equipped and ready for the next emergency broadcast, should you choose to take on the role of an emergency broadcaster. The course is designed for both station managers, and for individual volunteers and broadcasters.

More information about the course is available on the CBAA website:
<https://learning.cbba.org.au/collections/emergency-broadcasting>

- **CBAA Resilience and Trauma in Community Broadcasting Course**
This course is a set of modules, designed to support the resilience of community broadcasters when dealing with traumatic experiences. CBAA partnered with Dart Centre Asia Pacific to create this resource.

Broadcasting stings for community broadcasters

- **Emergency Reporting on Radio and Social Media**
The CBAA worked with the ABC Emergency Team to create this set of resources to support CBAA members when Emergency Broadcasting (EB) may be required.

More information about emergency stings and example stings can be found at: [Emergency Reporting on Radio and Social Media](#)

External resources for dealing with emergencies

- **Justice Connect - National Volunteering Guide and Disaster Legal Toolkit**
Justice Connect is a not-for-profit law organisation that provides a range of resources for community organisations including the [National Volunteering Guide](#).
Resources about managing volunteer safety can be found on the [website](#).

The [Disaster Legal Toolkit](#) also provides answers to disaster related legal questions and issues.

- **Self Care, Working with Victims and Survivors**
 - [Australian Red Cross - Communicating in recovery](#)
 - [The Dart Center for Journalism and Trauma](#), a project of the Columbia University Graduate School of Journalism, is dedicated to

informed, innovative and ethical news reporting on violence, conflict and tragedy.

- **State Service List**
[This list](#) sets out the state bodies that stations can sign up directly with to receive official warnings. An additional list is located in CBAA's resource library [here](#).
- **Australian Institute for Disaster Resilience – Knowledge Hub**
The Australian Institute for Disaster Resilience (AIDR) has developed the [Knowledge Hub](#), a national platform that supports and informs policy, planning, decision making and contemporary good practice in disaster resilience.
 - [Communities Responding to Disasters: Planning for Spontaneous Volunteers Handbook](#)
 - [Culturally and Linguistically Diverse Resources](#)
 - [Public Information and Warnings Handbook](#)
- **Radio Info's guide on broadcasting during emergency**
 - <https://radioinfo.com.au/news/broadcasting-during-fires-and-emergencies/>

Guidance Note

Code 7: First Nations Engagement and Programming

- 7.1 We will demonstrate respect and cultural sensitivity for First Nations cultures, languages, histories, knowledge, rights, and experiences in our work and in all programs broadcast.
- 7.2 We will strengthen relationships with local First Nations people and organisations.
- 7.3 We will include First Nations people or organisations in the planning and production of content about or affecting First Nations peoples, and seek advice on:
- a) using appropriate language, preferred terminology, and correct pronunciation;
 - b) observing cultural protocols;
 - c) respecting bereavement practices in content about people who have recently died; and
 - d) ensuring the consideration of regional differences in protocols, practices, experiences, and perspectives of First Nations communities.
- 7.4 We will prioritise First Nations voices when reporting on or discussing First Nations issues.
- 7.5 We seize opportunities to celebrate First Nations peoples and stories recognising the important role community media plays in truth-telling and

Aboriginal and Torres Strait Islander communities across Australia have different protocols, practices, experiences, and perspectives. Recognising the diversity of First Nations communities, this resource provides general advice on demonstrating respect and cultural sensitivity for First Nations cultures, histories, knowledge, rights, and experiences in our work.

A licensee can demonstrate compliance with the Code by making a record of their actions towards complying with this provision. This will assist a licensee to demonstrate their actions in the event a complaint is made against a provision in this code.

The kinds of actions stations should be taking to meet their obligations under Code 7 include:

- Encourage Aboriginal and Torres Strait Islander people to be part of the station
- Build relationships with local First Nations organisations, groups and businesses

- Include an Acknowledgement of Country or Welcome to Country where appropriate
- Talk to appropriate people from the First Nations community in the relevant area before broadcasting programs about or affecting local Aboriginal and Torres Strait Islander people in that area. An appropriate person may be a person with a particular attribute or education or knowledge or in good standing within the community or accreditation of some kind
- Check how people would like to be referred to and the correct pronunciation of names and any words in language
- Cover a range of First Nations opinions and perspectives
- Make sure to observe cultural protocols around using the names or voices of people who have died
- Consider how the representation of Aboriginal and Torres Strait Islander peoples in our programs might impact First Nations communities

Some ideas for building and strengthening ties with First Nations communities in your area include:

- Attend First Nations events
- Reach out to First Nations organisations
- Partner with sports clubs, festivals and schools
- Involve First Nations representatives in your programs, getting young people involved can encourage participation from their families
- Support First Nations businesses (eg. via [Supply Nation](#))
- Check whether anyone at the stations has connections to First Nations people in the local community who they might be able to bring along
- Make the station feel welcoming (e.g. by airing First Nation's stories and music, think about what goes up on the walls of the station, on the website and social media).

Community radio reaches approximately 5 million people across Australia. It is important that we consider the way that Aboriginal and Torres Strait Islander peoples are represented by our stations. The representation of First Nations stories in the media shapes perspectives on First Nations issues by the wider Australian population. It affects the relationship between non-Indigenous people and First Nations people, and it can strongly impact the way that Aboriginal and Torres Strait Islander people see themselves.

Community media can work against negative portrayals of First Nations people that have dominated mainstream media by:

- Giving Aboriginal and Torres Strait Islander people the opportunity to provide their perspectives on air
- Making sure newsrooms balance negative First Nations stories with positive stories celebrating First Nations achievements and current affairs
- Seeking out opportunities for Aboriginal and Torres Strait Islander people to participate in programs, not only about First Nations issues

For a better understanding of the impacts of representing Aboriginal and Torres Strait Islander people, communities and stories see: [Closing the Gap and First Nations Peoples Representation in the Media](#)

When station activities may impact First Nations communities it is important to consult with First Nations people at the station and in the community. Aboriginal and Torres Strait Islander peoples are made up of many different groups with different cultures and cultural protocol and different views and values. The practices of one community might be a bit different from another just thirty minutes down the road from each other. Therefore, when making a program with content about a First Nations community, it is important to consult with Aboriginal and Torres Strait people and Elders from the community concerned.

When referring to First Nations peoples, it is important to consider what language to use. Different people will have a different preference and some people may not like some terms. The most commonly used terms are "Aboriginal and Torres Strait Islander", "First Nations", "First Peoples" and "Indigenous". Some people may prefer to be introduced by where they are from e.g 'Leah is a Goa-Gunggari-Wakka Wakka Murri woman'. It is best to ask the individual, group or community you are talking about what their preference is. Make sure to check the pronunciation of any words you are not sure about.

First Nations communities have cultural protocols that it is important to observe. In many communities there are protocols around using the name and voice of a person for a period after that person has died. This can include the music of someone who has died. It may be appropriate to include a warning if a name or voice is going to be used. Where appropriate, your station should incorporate an Acknowledgement of Country and Welcome to Country into broadcasts, meetings and events. Protocols for welcoming visitors to Country are an important part of Aboriginal and Torres Strait Islander cultures.

This guidance material has been drawn from advice from a range of sources:

- [Reporting on Aboriginal and Torres Strait Islander Peoples and Issues](#)
- [Closing the Gap and First Nations Peoples Representation in the Media](#)
- [The Greater Perspective - Indigenous Protocols](#)
- [Respecting Indigenous people and culture in ABC content](#)
- [Acknowledgement of Country and Welcome to Country](#)
- [CBF First Nations Engagement Protocol](#)



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

Need Help?

- If you have any questions or want to continue the conversation, the CBAA can connect you with stations who can share from their experience. Get in touch via (02) 9310 2999 (9am - 5pm AEST Monday to Friday) or email us at support@cbaa.org.au

Guidance Note

Code 8: Australian Music

- | | |
|-----|---|
| 8.1 | Of all music programming, we must broadcast at least 25% Australian music, except community broadcasters representing an ethnic or fine music community. |
| 8.2 | Community broadcasters representing an ethnic or fine music community must broadcast at least 10% Australian music of all music programming. |
| 8.3 | The requirements in this Code are calculated as a percentage of all music played over a calendar month and do not include music used in sponsorship announcements or station and program promotions |

Code 8 requires stations adhere to an Australian music quota to ensure more Australian songwriters and music creators receive the recognition they deserve. Of all music programming, at least 25% of Australian music must be broadcast unless a station is licenced as Ethnic or Fine Music.

To meet the Australian music requirement, aim to play 30% Australian music across all general programming to allow for discrepancy in specialist programs (music and/or talk based) which may not be able to meet the 25% quota.

Some community radio stations set higher music targets than required. 4ZZZ a music station that represents the Specialised Music community interest that is located within a thriving music scene, averages 60% Australian music and 32% local (in their case Brisbane) music. The community broadcasting sector is very proud of the key role it plays in supporting and championing Australian music and Australian artists.

Ethnic and Fine Music stations

If your station is licenced as an Ethnic or Fine Music station the station is required to meet at least 10% Australian music of all music programming.

To find out, on your licence, check your station's Community Interest listing. An Ethnic station will have 'Ethnic – General' community interest. A Fine Music station's Community Interest is 'Music – Fine Music'.

How to meet the quota

Some stations require every program to play and track Australian content to ensure the station and each individual program meets their Australian music quota. A good way to communicate to everyone at the station is with a music policy.

For a station needing to meet the 25% quota, a simple way to explain this to station staff or volunteers is to tell presenters to aim to play 1 Australian music track in every

3 music tracks played in a program. This is a good way to allow for specialist programs which may not meet a 1 in 4 ratio for Australian music tracks played.

Ethnic and Fine Music stations can meet the 10% quota using the '1 in 10' rule – play 1 Australian music track in every 10 tracks. One example of how an Ethnic station meets their quota is by playing 2 Australian music tracks every hour. The station's programs are usually an hour long without the space to play multiple music tracks. Focusing on broadcasting 2 Australian music tracks each hour helps to keep the quota achievable. The station also finds it helpful to create playlists with lots of Australian artists which is used to fill any gaps in their broadcast schedule and make up for not playing enough tracks in their programs.

How to monitor Australian music content

Ways to monitor your Australian music content are changing. Historically stations manually logged their Australian music playlists. As technology has become more sophisticated, digital tools can be used to track airplay.

One way to monitor Australian music content is complete air checks in your station's music programming schedule to ensure your quota is met. Making sure Australian music is tagged as Australian music can make the exporting process easier.

Another way is by using digital tools to monitor Australian music content. Currently, MetaRadio provides software that helps stations monitor music content through integration with a playout system.

The CBAA along with APRA AMCOS, are beta-testing content recognition technology which monitors and tracks all station music airplay. The project aim is to eliminate the need for manual reporting processes by providing an accurate record of music tracks that are broadcast.

Use Amrap to access Australian music

The Australian Music Radio Airplay Project (Amrap) is an exclusive and free platform for community radio presenters to discover and download new Australian music.

Amrap connects community stations and program makers with musicians, record labels, and music representatives through amrap.org.au. Amrap helps stations meet their Australian music quotas and stay at the forefront of new music.

By downloading tracks to broadcast via Amrap as either high quality MP3 or lossless.wav files, program makers can broadcast the music on their community radio station. By downloading tracks, stations are supporting Australian artists and music to be ranked on the Amrap charts.

Amrap also holds a licence directly with music royalty collectors APRA AMCOS and PPCA, meaning that copyright fees for music airplay on community radio is collected by APRA AMCOS and PPCA without a station managing that on their own.

Sourcing music legally

Under community radio licences, licenced music can be broadcast when legally sourced. Licenced music that is legally sourced includes hard copy vinyls/CDs as well as digital files purchased from online stores.

Digital files can be purchased to add to your music library from a variety of online sources. These sources include but are not limited to:

- Bandcamp
- Soundcloud
- Beatport
- Boomkat
- iTunes store

Broadcasting music on radio from a streaming service including but not limited to Spotify, Apple Music, Amazon Music Unlimited, Juno Download or Youtube is not allowed as their terms and conditions state their services operate for personal use only. Streaming services retain ownership of their music content even after music is installed on a user's device. Music streaming is licensed by the streaming service which means that a user gains access to music content under conditions. When using a streaming service, music content is not sold or transferred to the user for redistribution by radio broadcast.

For example, broadcasting music from Spotify is contrary to Spotify's Conditions of Use which permits personal, non-commercial use only and prohibits the redistribution or transfer of Spotify content.

Copyright and Music Licenses

Community broadcasters generally need permission to broadcast material protected by copyright, such as music. Rather than needing to approach each individual rightsholder, this permission can be obtained via two licenses: one from APRA AMCOS and one from the PPCA.

Stations need to hold licenses because there are multiple copyrights in most recordings and music videos.

For community radio stations, both PPCA and APRA AMCOS play a role in the licensing and royalty collection process for broadcast music, but their areas of focus and the rights they represent are different. The PPCA licence covers the use of recorded music, while the APRA AMCOS licence covers the use of musical compositions. Obtaining blanket licences from them means that stations don't have to seek individual permissions for different pieces of music they broadcast.

PPCA

Community radio stations need to obtain a licence from the Phonographic Performance Company of Australia (PPCA) to play recorded music. The PPCA collects licensing fees from the radio stations for the public performance and

broadcast of recorded music. These fees are then distributed as royalties to the copyright owners, including artists and record labels. These fees are collected and paid on your behalf by CBAA and calculated at 0.8% of annual revenue with a 50% discount due to being a CBAA member.

The PPCA offer the broadcast licence (for music on air) and the simulcast licence (for online streaming) currently there is no finalised on-demand licence (for podcasts or recorded shows) available to community radio stations.

APRA AMCOS

Community radio stations also need to obtain a licence from Australasian Performing Right Association and Australasian Mechanical Copyright Owners Society (APRA AMCOS) for the public performance of musical works, which includes the compositions and lyrics of songs. APRA AMCOS represents the rights of songwriters. The fees collected by APRA AMCOS are distributed as royalties to the songwriters and music publishers. The CBAA is not involved with the collection of APRA AMCOS fees.

Australian Music Definition

Amrap defines Australian music for the purposes of Amrap as performances by Australian artists who are citizens of, or, ordinarily residents of Australia. This includes:

- the main performer
- where a band is comprised of 50% or more of Australian citizens/residents and

Unless the above criteria has been met, it does not include music that is:

- performed by session musicians (even if they are Australian citizens or residents)
- produced by an Australian
- written by an Australian (lyrics or music) but performed by a non-Australian artist or
- recorded in Australia (if the artist is not a resident or citizen).

Guidance Note

Code 9: Sponsorship

- 9.1 Our editorial decisions about the content and style of news and journalistic content, individual programs and overall programming must not be influenced by sponsors and we will avoid or adequately disclose any conflict of interest.

General guidance

Sponsorship funding is an important part of many station operations but needs to be managed so the station maintains its integrity and independence. Code 9 ensures that station programming is free from influence from financial supporters and that sponsorship content is suitable for broadcast See also the ACMA's [Community broadcasting sponsorship guidelines.](#))

How to apply Code 9.1

Code 9.1 requires stations to:

- ensure editorial and programming decisions are not influenced by sponsorship; and
- avoid or adequately disclose conflicts of interest.

Decisions not based on sponsorship

Station sponsors are not allowed to influence the content and style of news and journalistic content, individual programs and overall programming. A station must reject any attempt by a sponsor to demand that news or other content be covered in particular way in return for their financial support. A station should not, for example, create a music program specifically so that a sponsor can promote themselves around it: a music store sponsoring a music program would be acceptable, or a music venue sponsoring a live music program would be acceptable, but it would not be acceptable for the sponsor to suggest the program.

Managing conflicts of interest

Conflicts of interest occur when a presenter, member of station management, the board or committee or other decision maker has an interest in or relationship to a sponsor which may (or may be perceived to) affect decisions about that sponsor or about on-air content.

A potential conflict of interest doesn't mean the station has to reject the sponsorship proposal, but it must manage the conflict of interest appropriately and transparently. Examples of conflicts of interest include:

- financial interest in whether a sponsorship proposal is accepted or rejected;
- familial or close personal relationship with someone who has a financial interest in a sponsorship proposal; and/or

- relationship with a current or potential station sponsor that influences (or could be seen to influence) programming or airtime decisions, whether positive or negative.

In each of these cases, the person with the conflict of interest must declare and document the conflict of interest on the station's Conflict of Interest Register. Station management should ensure that the person with the conflict abstains from discussions and voting around the sponsorship.

The station must be able to demonstrate that decisions were made in the best interests of the station, given the information available, and this can be done by:

- having an up-to-date conflict of interest policy such as the Australian Charities and Not-for-profits commission [template](#);
- maintaining an up-to-date conflict of interest register available for inspection on reasonable request (in line with station policy); and
- detailing in Board or Committee meeting minutes if anyone abstained on a resolution and what else was done to manage the conflict.

On-air conflict of interests

Potential conflicts can arise when on-air presenters look to interview station sponsors or others with whom they have a personal or financial relationships.

It can be appropriate to invite station sponsors who are knowledgeable on a topic to talk about it in an on-air interview if there is no advertising or promoting of a product, service or event offered by the sponsor, but their business interest in the topic should be disclosed to listeners.

This applies whether the interview guest has a sponsorship package with the station, or not, but stations should take special care as an interview is more likely to risk breaching the Code (and possibly a licence condition) if a sponsorship agreement is in place.

If a station volunteer has a personal relationship or financial or other connection with the guest (e.g as an employee), the volunteer must declare this relationship on-air.

Guidance Note

Code 9: Sponsorship

9.2 Sponsorship will not be a factor in deciding who can access broadcasting time.

How to apply Code 9.2

Code 9.2 obliges stations to make sure that decisions about who can access broadcasting time take into account the needs of audiences not the wishes of sponsors. This helps build audience trust that the station will not put commercial decisions ahead of its community.

Sponsors of a station must not have a say in what goes to air. The station **cannot** make programming decisions which prioritise the preferences of their sponsors over the needs of their listeners. Sponsors are also not permitted to influence the access that community members have to airtime or broadcast facilities.

The station must have suitable controls in place to ensure that all programming decisions are made in the best interests of listeners, members and the community of interest, without regard for the preference of sponsors. This could be done, for example, by establishing a programming sub-committee and having well-documented decisions.

Under this Code, a station must reject the following:

- A sponsor's requests that a presenter be dismissed or a program moved to another timeslot due to the sponsor's opinion of the program.
- A sponsor expectation to be interviewed on a topic aligned with their business without an invitation from the station or makes an interview a condition of the sponsorship.
- A third party pays a station to play a program with embedded sponsorship announcements where the content would not be of interest to the station if it was not paid for the broadcast.

Links:

- ACMA: [Community Broadcasting Sponsorship Guidelines 2008](#)

Guidance Note

Code 9: Sponsorship

9.3 Code 4 also applies to sponsorship announcements.

Code 9.3

Code 4: *Material Not Suitable for Broadcast*, contains restrictions on content that doesn't meet community expectations due to its potential harm or unreasonable offence to listeners, or because it is against the law (e.g., promoting tobacco).

Code 9.3 requires stations to apply the same standards to sponsorship announcements. Community broadcasters, including their management and boards, are responsible for all material broadcast by the station, whether the sponsorship content is created by the station or produced externally (including where airtime has been sold or outsourced to external content creators).

It is important to have systems in place to ensure all sponsorships that go to air have been vetted against Code 4. For example:

A sponsor provides the station with the text of a proposed announcement containing material that uses racist or sexist stereotypes. The station will need to work with the sponsor to change the wording so that it complies with Code 4.1(h).

A sponsor asks for a gambling ad to be run immediately before sporting commentary. The station can't accept this because it will be in breach of Code 4.1(d), but it can run the sponsorship announcement at another time if it otherwise complies with Codes 4.1(c) and (d).

For more details on how to work out what's not suitable under Code 4, see the Guidance Materials for Code 4.

Links:

- ACMA: [Community Broadcasting Sponsorship Guidelines 2008](#)