



Highland FM 107.1 Co-operative
Limited
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Policies of Highland FM 107.1 Co-operative Limited

licensee of

2WKT (Highland FM 107.1) community radio station

The following policies and procedures are based in part on the contents of the booklet, "Community Radio Broadcasting Codes of Practice 2008", published by the Community Broadcasting Association of Australia (CBAA), of which Highland FM 107.1 Co-operative Limited is a member. The codes will be updated following the next update of the CBAA codes and appendixes.

Volunteer policy

This document sets out Highland FM 107.1 Co-operative Limited's policy on the responsible management of its volunteer program. The purpose of the policy is to provide a clear statement about the roles and responsibilities of volunteers and 2WKT (Highland FM 107.1) community radio station.

All volunteers of Highland FM 107.1 Co-operative Limited must hold current financial membership of the co-operative. This includes initial membership allocation of 10 paid shares in the Co-Operative to the value of \$20. Membership is renewable annually by 30 June. Renewals are the responsibility of the membership manager. Annual renewal notices are sent out one month prior to due date by the membership manager.

Principles of volunteering

- Volunteering is the community and the volunteer
- is always a matter of choice

- is an activity that is unpaid and not undertaken for the receipt of salary, pension, government allowance or honorarium
- is a legitimate way in which citizens can participate in the activities of their community
- is a vehicle for individuals or groups to address human, environmental and social needs
- does not replace paid workers nor constitute a threat to the job security of paid workers
- respects the rights, dignity and culture of others
- promotes human rights and equality.

Volunteers' rights at Highland FM 107.1 Co-operative Limited

Volunteers have the right to:

- be treated as a co-worker
- be given suitable assignment with consideration for personal preference, temperament, abilities, education, training and employment
- know as much about the organisation as possible, its policies, people and programs
- expect clear and open communication from management and staff at all times
- be given appropriate orientation, introduction and provision of information about new developments
- sound guidance and direction in the workplace
- advance notice (where possible) of changes which may affect their work (such as programming changes)
- undertake volunteer activity without interruption or interference from management, staff or other volunteers
- a place of work complying with statutory requirements in regard to equal employment, anti-discrimination legislation, the Commonwealth *Racial Discrimination Act 1975* and occupational health and safety standard
- be heard, to feel free to make suggestions and to be given respect for honest and constructive opinion
- appropriate insurance cover such as volunteer and public liability insurance
- appropriate grievance procedures in the event of a dispute and, if necessary, conciliation, mediation or arbitration to assist with resolving the dispute
- receive written notification and reasons for suspension/release of services
- have services appropriately assessed and effectively recognised.

Volunteers' responsibilities at Highland FM 107.1 Co-operative Limited

Volunteers have the responsibility to:

- have a professional attitude towards their voluntary work
- be prompt, reliable and productive with regard to commitments and agreements made with the radio station
- notify the appropriate person if unable to meet commitments
- accept and abide by station rules
- understand and adhere to the Community Broadcasting Association of Australia's codes of practice and maintain familiarity with broadcast laws, such as defamation laws and the Commonwealth *Broadcasting Services Act 1992*
- not represent Highland FM 107.1 Co-operative Limited or 2WKT (Highland FM 107.1 publicly or commercially unless prior arrangement has been made)
- not bring into disrepute the operations, management, staff or other volunteers of Highland FM 107.1 Co-operative Limited
- treat radio station technical equipment with due care and respect and to notify technical staff of faults and problems
- undertake to complete a minimum of the basic level of training offered at the radio station if you are intending to work in any area of programming
- only use station resources and equipment in carrying out work for Highland FM 107.1 and not for personal or private purposes
- ensure that the station has your current contact details
- respect the racial and religious backgrounds and the sexual preferences of your co-volunteer workers and work to ensure that Highland FM 107.1 is a safe work place for everyone,
- contribute to the achievement of a safe, tolerant and equitable working environment by avoiding, and assisting in preventing, behaviour that is discriminatory.

Highland FM 107.1 Co-operative Limited's rights and responsibilities to volunteers

Highland FM 107.1 Co-operative Limited has the right to:

- expect a volunteer's cooperation in working to uphold and maintain the radio station's mission statement, the station charter and program policies
- expect a volunteer to be familiar with the laws relating to broadcasting, radio station policies and procedures
- expect a volunteer to be prompt, reliable and productive with regard to commitments and agreements made with the management of Highland FM 107.1
- have confidential information respected

- make a decision, in consultation with a volunteer as to where their services and skills would best be utilised
- make decisions which may affect a volunteer's work
- make programming decisions in accordance with programming policies and procedures
- develop, implement and enforce rules, policies and procedures for all aspects of station operation
- develop and maintain all property and residence of the station
- provide a volunteer with feedback to enhance their programming and broadcasting development
- expect clear and open communication from a volunteer at all times
- suspend or dismiss a volunteer in accordance with radio station policies and procedures due to contravention of station rules.

Highland FM 107.1 Co-operative Limited has the responsibility to:

- provide a volunteer with a work environment which embraces the principles of access and equity
- value the importance of a volunteer's role within the organisation
- place a volunteer in an appropriate, suitable position and environment
- give a volunteer with appropriate tasks in accordance with their strengths, abilities, training and experience
- provide a volunteer with training so that they can expand their expertise and abilities
- acknowledge a volunteer's contribution to the station and provide them with the appropriate recognition and/or rewards
- ensure paid staff members have the appropriate skills required to work with volunteers
- provide adequate opportunities for formal and informal constructive feedback
- provide a volunteer with information regarding any activities or changes at the radio station which may affect their work,
- consult with a volunteer (where possible and practicable) on issues that may affect their work,
- ensure that all station democratic processes are adhered to and that volunteers are consulted in major decision-making processes relevant to their work
- ensure that volunteers are aware of station democratic processes and are encouraged to participate in them.

Indigenous programming and broadcast of Indigenous issues policy

The policies of Highland FM 107.1 Co-operative Limited and its members are:

- Acknowledgement of the unique status of Indigenous peoples as the first Australians and to offer a way to demonstrate respect for their

cultures and customs. In the Community Radio Broadcasting Codes of Practice (2008), 'Indigenous Australians' refers to the Aboriginal and Torres Strait Islander peoples of Australia

- We will seek to involve and take advice from Indigenous Australians in the production of programs focusing on Indigenous Australians and should
- Where possible, we will consult the appropriate Indigenous media organisation broadcaster on appropriate forms of communication
- When reporting on Indigenous peoples and issues we will take care to verify and observe the best way to respect culture and customs by
- considering regional differences, that is, be mindful of differences between Indigenous local groups
- using appropriate words and phrases in referring to Indigenous peoples and their regional groups
- seeking proper advice on how to best respect Indigenous bereavement customs when reporting on people who are recently deceased
- using suitable words and phrases when reporting on the social and emotional well-being of Indigenous people.

Children's policy

Children under 18 years of age should be accompanied by a parent, guardian, or a person over 18 years of age appointed by a guardian, at all times when on the premises of Highland FM 107.1 Co-operative Limited's headquarters and the studios of Highland FM 107.1.

Presenters on air should remember at all times that children may be listening to a program, for example, they may be in a car or in a home with their parents who may be listening to Highland FM 107.1. All broadcasting from Highland FM 107.1 must be appropriate to children.

Complaints policy

A complaint from a member of the community regarding a broadcast on 2WKT (Highland FM 107.1), or on any other subject, may be received in person, by telephone, in writing (including on the station's website), or on the telephone feedback line. If a volunteer at the station takes the complaint, for example by telephone or in person, they must ensure that they write down all the details of the complaint as well as the complainant's contact details. The complaint must be given to the station manager who must pass it on to the board of directors.

All complainants who lodge complaints with Highland FM 107.1 Co-operative Limited must, under the *Broadcasting Services Act 1992*, receive a written response from the board within 60 days. A complainant who does not receive a response in that time, or who is not satisfied with the response or the outcome of the board's findings, may next lodge the complaint with the Australian Communications and Media Authority (ACMA).

Complainants may lodge complaints with the ACMA, and not with the board of Highland FM 107.1 Co-operative Limited if the complaint is a direct breach of the Act. For example, advertising on a community radio station is a direct breach of the Act. In this case, the ACMA will write to the co-operative regarding the complaint. When a complaint is made directly to the ACMA, the identity of the complainant remains confidential.

Volunteers of Highland FM 107.1 Co-operative Limited have the same rights as other members of the community to lodge complaints in this way. These complaints are separate from personal grievance complaints or from any other internal administrative complaints at Highland FM 107.1 Co-operative Limited, which are discussed elsewhere in this document.

Equality and diversity policy

Co-operative values

Highland FM 107.1 Co-operative Limited values are integral to everything that we do, and underpin our commitment to equality and diversity in all workplace practices

We lead the way
We do what's right
We care for each other
We take responsibility

Commitment

It is Highland FM 107.1 Co-operative Limited's policy that all volunteers be afforded:

- Equal and fair opportunities in recruitment, terms and conditions, development, promotions, and termination of membership
- A fair and safe working environment

Highland FM 107.1 Co-operative Limited will ensure that no person or group of people will be treated less favourably than another on discriminatory grounds and that all decisions will be based on merit. Volunteers are to be treated according to their skills, qualifications, competencies and potential.

Highland FM 107.1 Co-operative Limited recognises that laws exist that govern workplace equality and diversity and is committed to complying with them.

Diversity

As a voluntary organisation, our workforce comprises individuals from a wide range of backgrounds. Highland FM 107.1 Co-operative Limited is an inclusive organisation; we champion respect, acceptance and appreciation for all

volunteers. Diversity is integral to our culture and to how we conduct our business. It is evident in who we are, our sponsors, associates and the community which we service. Individual and group minority differences are celebrated and encouraged at all levels. We recognise the innovative and effective management of a diverse voluntary workforce that will directly impact our success as a community service provider.

Equality

Highland FM 107.1 Co-operative Limited aims to ensure the workplace is free from all forms discrimination, hostility, harassment and bullying. At no time do we condone discriminatory behaviour that is based on individual or group attributes, such as gender, sexual preference, transgender status, marital status, disability, religion, culture, racial origins, political preference, trade unionism, pregnancy or age. Throughout the volunteer relationship, Highland FM 107.1 Co-operative Limited undertakes to conduct regular training on equality in the workplace. Systems and processes are being put in place, to assist in managing the complaints and investigations process, so that all volunteers may feel confident their concerns are dealt with in a confidential, professional and objective manner. If a volunteer reports harassment, Highland FM 107.1 Co-operative Limited will undertake a prompt investigation appropriate to the circumstances. Anyone who reports incidents in good faith, which are believed to be violations of this policy, or anyone who is involved in the investigation of harassment, will not be subject to reprisal or retaliation.

Anti-discrimination, anti-harassment and anti-bullying policy

Aspirational principles

Highland FM 107.1 Co-operative Limited is committed to an environment that values the diverse nature of its membership.

Discrimination, harassment and bullying can have a serious effect on individuals, their families and friends. It can take many forms, and may be directed because of ethnicity, age, sexual orientation, physical or mental disability, religion or other similar beliefs, families, carer responsibilities, marital or some other personal characteristics.

Members who are subject to harassment, discrimination or bullying can suffer from feelings of fear, stress, anxiety and loss of confidence/self-esteem.

It can affect their work, family and personal life and their physical and mental health.

Consequences for the membership of Highland FM 107.1 Co-operative Limited, and also the organisation can include:

- Poor performance

- Ill health and absenteeism
- People leaving the organisation
- Complaints to courts and tribunals, resulting in financial costs and damage to the reputations of Highland FM 107.1 Co-operative Limited and its licensed radio station.

Members can be reluctant to make complaints as they may feel vulnerable and isolated. They may be fearful of ridicule, reprisals and of simply not being believed or being taken seriously. Furthermore there are fears about effects of making a complaint on their career or professional reputations.

Consequently, members who are being discriminated against, harassed or bullied do not complain. They will suffer in silence and put up with the situation or leave the organisation.

The reasons for the anti-discrimination, anti-harassment and anti-bullying policy are to give:

- Clear commitment that HFM will not tolerate harassment, discrimination or bullying, and to assist in creating a working and volunteer environment where this is known and understood by the membership.
- Advice and guidance on how such situations should be dealt with.
- The membership confidence to deal with situations that arise, and find the best solution and outcomes for themselves either formally or informally.

Scope

The anti-discrimination, harassment and bullying policy is applicable to all members of Highland FM 107.1 Co-operative Limited, to 'friends' of its licensed radio station, Highland FM 107.1, and to visitors, contractors, sub-contractors, service providers and any other persons associated with the functions of the co-operative or the radio station.

Aims of the anti discrimination, anti-harassment and anti-bullying policy

Highland FM 107.1 Co-operative Limited is committed to promoting equality of opportunity and valuing diversity. A key aspect of this commitment is to ensure that we have an environment where individuals are able to fulfil their personal potential. An essential part of this is ensuring that the environment is free from any forms of discrimination, harassment or bullying.

Highland FM 107.1 Co-operative Limited will not tolerate discrimination, harassment or bullying. The aims of this policy are to:

- Explicitly state that such behaviour is unacceptable and is unlawful
- Outline the consequences of such behaviour if allegations are proven

- Confirm that the policy applies to the board of directors and the members alike
- Ensure that all members of Highland FM 107.1 Co-operative Limited understand their responsibilities, and that they should not behave towards others in ways that could be perceived as discrimination, harassment or bullying
- Make a commitment that complaints be taken seriously and will be dealt with sensitively, swiftly and fairly, and will take into account, as far as possible, the wishes of the complainant
- Develop a working environment in which discrimination, harassment and bullying are known to be not acceptable and where individuals who have made a complaint in good faith feel confident they will be treated fairly without fear of ridicule or reprisal.

The anti-discrimination, anti-harassment and anti-bullying policy applies to all instances of discrimination, harassment or bullying that occur in or on Highland FM 107.1 Co-operative Limited's owned or managed premises or in such places and on such occasions as such behaviour may be reasonably deemed to harm the reputation of the co-operative and its licensed radio station, Highland FM 107.1, or its relationship with the local community.

Allegations of harassment, discrimination or bullying will be taken very seriously, and if proven, may lead to disciplinary action up to and including dismissal from duties of a volunteer from the co-operative.

Definitions

(The following definitions were sourced from employment legislation and advisory bodies.)

Discrimination – takes place when an individual or a group of people is treated less favourably than others because of factors unrelated to their merit, ability or potential.

Direct discrimination – occurs when factors unrelated to merit, ability or potential of a person or group are used as an explicit reason for discriminating against them.

Indirect discrimination – occurs when there are rules, regulations or procedures in place that have a discriminatory effect on certain groups of people.

Harassment – unwanted conduct that may create the effect (intentionally or unintentionally) of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment that interferes with an individual's learning, working or social environment, or induces stress, anxiety or sickness on the part of the harassed person.

Bullying – can be defined as persistent actions, criticism or personal abuse, either in public or private, which humiliates, denigrates, undermines, intimidates or injures the recipient.

Victimisation – is punishing or treating an individual unfairly because they have made a complaint, or are believed to have made a complaint. It is unlawful, as is post-employment victimisation.

Legal framework

As a community voluntary organisation and a registered radio station license holder, there are various legal obligations placed upon Highland FM 107.1 Co-operative Limited to provide a working and social environment that is free from harassment, discrimination and bullying.

Examples of legislation are included but are not limited to:

Sex Discrimination Act, 1984 (Cth)

Disability Discrimination Act, 1992 (Cth)

Workplace Relations Act, 1996 (Cth)

Workplace Gender Equality Act 2012 (Cth)

Human Rights and Equality Opportunity Commission Act, 1986 (Cth)

Sex Discrimination Amendment Bill, 1995 (Cth)

Racial Hatred Act, 1995 (Cth)

These statutes give definitions of discrimination and make discrimination unlawful on the grounds of gender, marital status, gender reassignment, status, racial grounds, disability, religion or belief and sexual orientation.

While there is no specific legal definition of bullying, it is viewed to be a form of harassment. Case law has given legal precedents with regard to bullying.

Legislation also gives individual rights against discrimination or unfair treatment with regard to a range of other reasons, including:

- Membership or non-membership of a trade union provision
- Relating to maternity, parental or adoption responsibilities
- Family and caring responsibilities
- Whistleblowing'
- Part-time work
- Equal opportunity and diversity
- Health and safety

Confidentiality

Highland FM 107.1 Co-operative Limited will protect the confidentiality of any individual member and will safeguard any information disclosed voluntarily within the regulations set by the *Privacy and Personal Information Protection Act 1998 (NSW)*.

Highland FM 107.1 – Freedom of expression on radio

While it is recognised that Highland FM 107.1 Co-operative Limited must provide for freedom of expression, it is essential that an environment is maintained which is not intimidating. To this end, presenters should discuss the policies of Highland FM 107.1 Co-operative Limited with interviewees before an interview begins. Radio discourse requires the communication of the views and/or beliefs of others and, therefore, it is important that a presenter distance him or herself and Highland FM 107.1, with appropriate comment on air, from views that are likely to cause offence or may be seen as discriminatory. All on-air discussion should comply with Highland FM 107.1 Co-operative Limited's policies and the Community Broadcasting Association of Australia's "Community Radio Broadcasting Codes of Practice 2008".

Roles and responsibilities

The directors of the board of Highland FM 107.1 Co-operative Limited, its office bearers and appointees, and its appointed radio station office bearers, are committed to ensuring that its anti-discrimination, anti-harassment and anti-bullying policy is robustly implemented and also regularly monitored and reviewed. Members and office bearers equally play an integral role in working, learning and living by these values.

The Board of Highland FM 107.1 Co-operative Limited is responsible for ensuring that:

- Strategic objectives and the anti-discrimination, anti-harassment and anti-bullying policy is effectively implemented and mainstreamed
- All members, visitors and contractors to the co-operative's headquarters and are aware of their roles and responsibilities in relation to this policy and that suitable training is provided to carry out these responsibilities
- Appropriate action is taken against those individuals who do not act in accordance with this policy
- Highland FM 107.1 Co-operative Limited complies with all legislative requirements
- Relevant procedures and policies are implemented and maintained
- The co-operative promotes an environment that values diversity, promotes inclusion and is committed to ensuring equality of opportunity for all members, visitors, service users, partners and stakeholders.
- The diversity and equality plans are developed and implemented in accordance with relevant legislation
- Effective consultation and involvement occurs with key stakeholders with respect to all relevant strategies, policies, procedures and practices
- Provision of an effective data monitoring, analysis and publishing process is maintained in order to support the equality and diversity agenda

- Provision of advice, support and guidance to office bearers, members and related stakeholders, regarding equality and diversity matters
- Design and delivery of training initiatives to support the promotion and implementation of the equality and diversity agenda.
- Support the development and training functions of Highland FM 107.1 Co-operative Limited Limited in the context of equality and diversity requirements and develop activities for members related to equality and diversity.

Members of Highland FM 107.1 Co-operative Limited are responsible for:

- Adopting, implementing and complying with this anti-discrimination, anti-harassment and anti-bullying policy
- Attending training sessions when requested, as well as reporting and challenging unacceptable behaviour
- Reporting any incidents of concern, including specific matters, in relation to discrimination, harassment and/or bullying
- Ensuring all contractors, sub-contractors and service providers are responsible for complying with these policies and all other legislative requirements as required by Highland FM 107.1 Co-operative Limited.

Monitoring

The monitoring process is an important way of determining whether measures taken by Highland FM 107.1 Co-operative Limited to combat discrimination, harassment and/or bullying are effective. Monitoring forms an important part in ensuring that equality and diversity is a reality within the co-operative. Information is to be gathered sensitively with appropriately worded questions, and confidentiality is to be ensured. Highland FM 107.1 Co-operative Limited will make plain the purpose of the monitoring and use the information gathered to create positive change.

The effectiveness of the monitoring process will be reviewed annually prior to the Annual General meeting and will be presented to the membership for their consideration. The policy will be amended from time to time as changes in legislation occur.

Complaints about discrimination, harassment or bullying

Any cases of discrimination, harassment and bullying will be taken very seriously by the board of Highland FM 107.1 Co-operative Limited and will be treated as grounds for disciplinary action.

Members who believe they have not been fairly treated in accordance with this policy, should raise issues in the first instance with the board-appointed membership manager who will report to the board. If the situation is not resolved satisfactorily, then the complainant should follow Highland FM 107.1 Co-operative Limited's grievance and dispute resolution policy.

Radio presenters, who believe they have not been treated fairly and in accordance with this policy, in terms of their radio broadcasts or other experiences that occur within the radio station, in the first instance should raise the issues with the board-appointed station manager, who will report to the board. If the situation is not resolved satisfactorily, then the member should follow Highland FM 107.1 Co-operative Limited's grievance and dispute resolution policy.

Any visitor, contractor or service provider to Highland FM 107.1, who believes that they have not been treated fairly and in accordance with this policy, in the first instance should be directed to raise the issues with the board-appointed station manager, who will report to the board. If the situation is not resolved satisfactorily, then they should follow Highland FM 107.1 Co-operative Limited's grievance and dispute resolution policy,

(The above applies to any complaints on any issues related to Highland FM 107.1 Co-operative Limited or its licensed radio station, Highland FM 107.1.)

If a complaint is found to be malicious or mischievous, it may provide grounds for disciplinary action against the complainant.

Further guidance regarding complaints of discrimination harassment or bullying can be found in this document's sections on equality and diversity.

Grievance and dispute resolution policy

What is a grievance?

A grievance is any type of problem, concern or complaint related to a volunteer's work or work environment. A personal grievance can be about any act, behaviour, omission, situation or decision impacting on a volunteer, which the volunteer believes is unfair or unjustified.

A grievance can relate to almost any aspect of a volunteer's work, for example:

- Safety in the workplace
- Training
- Leave allocation
- Supervision
- Rosters or hours of work
- Performance appraisal
- Appointments

Highland FM 107.1 Co-operative Limited recognises that a volunteer may not perform to the best of their ability if they feel they are being treated unfairly or are feeling aggrieved. Accordingly, the co-operative will endeavour to provide a fair and just working environment, by aiming to ensure that volunteers have

access to processes for the resolution of genuine personal grievances related to the workplace.

As such, Highland FM 107.1 Co-operative Limited will use its reasonable endeavours to:

- Encourage staff to come forward with personal grievances
- Deal with personal grievances in a supportive way, without victimisation or intimidation of any person connected with the grievance
- Encourage fairness, impartiality and the resolution of personal grievances as reasonably promptly and as close as possible to the source of the grievance
- Have office bearers of the co-operative and the radio station seek to prevent and resolve personal grievances.

Personal grievance procedure

Where a personal grievance arises, Highland FM 107.1 Co-operative Limited will endeavour, if appropriate, to resolve the dispute in line with the following procedure:

Preliminary steps:

Volunteers can attempt to resolve a grievance by themselves: If the volunteer feels comfortable in doing so, they should attempt to address the issue directly with the person(s) involved in the grievance. The volunteer may find that the other person was not aware of their grievance and the matter may be able to be resolved directly.

Volunteers can report the grievance to someone else: If the volunteer does not feel comfortable talking to the person(s) involved, or talking to them was ineffective, the volunteer should report the grievance to an appropriate office bearer, for example the station manager or the membership manager.

After receiving and reporting a personal grievance to the board of directors, the person station/membership manager should:

- Obtain information about the volunteer's grievance and what the volunteer considers will resolve it
- Explain to the volunteer how the personal grievance procedure works
- Decide if they are the appropriate person to handle the grievance.

This includes considering whether they have the necessary authority and can deal with the grievance in an impartial manner. If the station/membership manager feels they cannot effectively deal with the volunteer's personal grievance, they will refer the matter to the board of directors to appoint a more appropriate officer.

Once the appropriate officer is confirmed, that person may commence one of the procedures below that is regarded as suitable for dealing with the grievance.

Step 1 – Informal procedure:

This involves a range of informal actions to resolve the grievance and depend on the individual circumstances of the grievance. Possible actions include, but are not limited to:

- The officer discussing the issue with the person against whom the complaint has been made
- The officer facilitating a meeting between the parties in an attempt to resolve the issue and move forward.

Many personal grievances are able to be resolved through the informal procedure. However, in circumstances where the officer considers the informal procedure is not appropriate, and the grievance is sufficiently serious, the grievance may be escalated to the formal procedure.

Step 2 – Formal procedure:

If the grievance is not able to be resolved through the informal procedure, the formal procedure may be commenced. This involves a formal investigation of the grievance and a decision about appropriate actions and outcomes. The investigation generally involves collecting information about the grievance and then making a finding based on the available information. Once the finding is made, the officer, or an external investigator, will make recommendations about the grievance.

Step 3 – Appeal:

If the volunteer is dissatisfied with the outcome of the formal investigation, they may appeal the decision to the supervisor or manager board of directors. The decision of the majority vote of the board of directors is final. There are no further steps that Highland FM 107.1 Co-operative Limited can take under this grievance policy. Where all parties to the grievance agree, the grievance may be referred to an external mediator.

While a process related to a personal grievance is taking place, all work involving volunteers related to the grievance process should continue as normal. A person involved in any sort of victimisation of any personal related to the process investigation will be subject to disciplinary action.

Procedures for disciplinary action and dismissal of volunteers from duties

The purpose of these procedures is to outline a series of steps for disciplinary measures. The steps are taken in part from the CBAA's "Community Radio

Broadcasting Codes of Practice 2008” booklet. The procedures aims to provide a clear and fair structure that is understandable to both the volunteer office bearers and volunteers members of Highland FM 107.1 Co-operative Limited and Highland FM 107.1.

The policy includes an appeals mechanism to ensure a 'right of reply' to a volunteer who has been disciplined. This is further complimented by Highland FM 107.1 grievance and dispute resolution policy and procedure, which may be used in a situation where a volunteer believes they have not been fairly heard or that the procedures for disciplinary action and dismissal of volunteers from duties has not been adequately followed..

This document does not include the procedure for expulsion of a member of Highland FM 107.1 Co-operative Limited, which is laid out in “The Rules of Highland FM 107.1 Co-operative Limited”.

The procedure for disciplinary action is a three-step process as follows:

1. First formal notice in writing
2. Second formal notice in writing
3. Notice to the volunteer of dismissal from duties.

For issues that are considered minor, a conversation with a volunteer may be appropriate. This will not be part of the formal disciplinary action, although it may be referred to in later action. It is however recommended that a written 'Record of Discussion' be prepared and signed by the officer appointed by the board to represent Highland FM 107.1 Co-operative Limited.

The following procedures should be applied, depending on the seriousness of the incident requiring disciplinary measure:

- A written notice will include details of the issue and, where feasible, evidence, in a case where the disciplinary measure has been instigated by a complaint. It may be appropriate to include a copy (with identification removed), or an extract of a complaint, where appropriate. It should also be signed by both parties. If the party being disciplined refuses to sign, this should be noted, and a reason stated.
- Further disciplinary actions, such as a suspension of volunteer duties for a period of time, may also be appropriate. In such cases. These actions will be included with the formal notice in writing.
- Every effort will be taken to ensure that notice of a disciplinary measure, whether formal or informal, will be given at an appropriate time, for example, not immediately prior to or during a broadcast.
- Note of a disciplinary measure will be given by a designated director of the board.

- Volunteers will be provided an appeal against the action. This may take the form of a meeting with the board, or a representation in person and/or in writing to the board.
- The volunteer may bring a representative to any such meeting.
- Should an appeal result in a charge of the disciplinary action, or removal of it, this will be confirmed in writing to the volunteer within seven days.

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

- Poor timekeeping or unreliability
- Not following pre-existing station rules and policies, including programming policies and program briefs
- Engaging in acts or broadcasts that may breach the Community Radio Broadcasting Codes of Practice
- Engaging in broadcasts that may breach other related legislation, such as the *Broadcasting Services Act 1992* (which provides provisions for community sponsorships), or copyright or defamation legislation.
- Inappropriate handling or use of station equipment or property
- Rudeness or hostility towards other volunteers
- Intoxication through alcohol or other substances during broadcasting hours.
- Publicly bringing Highland FM 107.1 Co-operative Limited or Highland FM 107.1 into disrepute.

Some conduct may be tantamount to 'gross misconduct'. In this instance, a volunteer may be dismissed from duties without prior warning. This policy does not include expulsion of the volunteer member from the co-operative. This is covered in "The Rules of Highland FM 107.1 Co-operative Limited".

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

Verbal or physical harassment of any other volunteer or visitor, particularly in respect of race, sex or religion.

Wilful damage to or theft of property belonging to Highland FM 107.1 Co-operative Limited, or another volunteer or visitor.

Falsifications of any of the organisation records for personal gain
Commercial misrepresentation of Highland FM 107.1 Co-operative Limited or Highland FM 107.1.

In a case of a volunteer being dismissed without prior warnings the volunteer will be provided an appeal as described.