



COMPLAINTS MANAGEMENT POLICY & PROCEDURES

1. Introduction

Ellenbrook Community Radio (Inc) trading as VCA88.5FM (Radio VCA88.5FM) is committed to ensuring that any person or organisation who is a member of Radio VCA88.5FM and affected by its operations has the right to lodge a complaint or to appeal a decision of the organisation. All concerns raised will be addressed in a way that ensures access and equity, fairness, accountability and transparency.

2. Purpose

The purpose of this **Complaints Management Policy and Procedures** (Policy) is to explain how complaints are managed by Radio VCA88.5FM and our guiding principles. Radio VCA88.5FM encourages and supports people to raise concerns they may have about our station as feedback helps improve our workplace and the service we provide to the community.

3. Scope of Policy

This Policy and its associated procedures are designed to address internal complaints raised by members, presenters, and volunteers. It is also applicable to external complaints received from the general public where it relates to a breach of licence conditions or the Broadcasting Services Act 1992 requirements, or the Community Radio Broadcasting Codes of Practice (the "Codes").

This Policy applies to:

- All members, presenters, and volunteers at Ellenbrook Community Radio VCA 88.5FM.
- Our listeners, visitors to the station, and the general public.

This Policy should be read in conjunction with the following policies and codes of practice, available on Radio VCA88.5FM's website:

- Code of Conduct Policy
- Presenter Conduct & Participation Policy
- Discrimination, Harassment & Bullying Policy
- Health and Safety Policy
- Radio VCA88.5FM's Constitution
- Community Radio Broadcasting Codes of Practice

4. Radio VCA88.5FM's Commitment

Radio VCA88.5FM will uphold the following principles and actions to the best of their ability:

Accessibility:	<p>Ensure our complaints and appeals management procedure is:</p> <ul style="list-style-type: none"> • available to all members and the public on our website. • incorporated into presenter and volunteer induction and training programs. • communicated and promoted to our contractors, sponsors and stakeholders. • straightforward process, including easy to use online lodgement of your complaint.
Safe Culture:	<p>Take appropriate steps to ensure:</p> <ul style="list-style-type: none"> • members and volunteers feel supported and encouraged to raise concerns and treated respectfully, acknowledging the significance of the issue to the complainant. • Members and volunteers are protected from any form of retaliation or victimisation following lodging a complaint. • the health and wellbeing of our members and volunteers is prioritised, and proactive and decisive action is taken to manage unreasonable or unacceptable behaviour. • support is available to members and volunteers throughout the complaint process from lodgement of a complaint through to resolution. • confidentiality is maintained for all parties involved as far as possible. Information will only be disclosed if required by law or otherwise necessary.
Responsiveness:	<p>Keep communication open and timely by:</p> <ul style="list-style-type: none"> • acknowledging receipt of a complaint within 48 hours. • keeping parties to the complaint appropriately involved and informed of progress. • aiming to complete investigations and provide a formal response to the complaint within 28 days of receipt of the complaint.
Efficiency:	<p>Ensure complaints are handled efficiently by:</p> <ul style="list-style-type: none"> • adhering to a structured approach with a dedicated Complaints Officer authorised to delegate and escalate all or part of the complaint to the most appropriate person or department. • encouraging members to resolve complaints on an informal basis through direct communication and mutual understanding.
Fairness:	<p>Follow a procedurally fair process that:</p> <ul style="list-style-type: none"> • allows any person to make a complaint or provide feedback with all complaints taken seriously. • ensures complaints or appeals are evaluated following principles of natural justice. • complies with legislative requirements.
Accountability:	<p>Facilitate improvement by:</p> <ul style="list-style-type: none"> • recording complaints and disputes including the issues raised and decisions made. • regularly reviewing complaints and disputes to understand concerns raised and evaluate the underlying root cause. • revising our programming and operations based on complaints and disputes data and trends. • reviewing our complaints policy and procedure regularly in consultation with our members, presenters and volunteers to identify business improvement opportunities.

COMPLAINTS PROCEDURES

5. How to Lodge Feedback or Make a Complaint

Feedback, complaints or concerns from the general public or our members, presenter or volunteers, can be lodged online through our website at <https://885fm.com.au/>.

Submitting your complaint online ensures your complaint is recorded in a centralised system and improves our response time. Your complaint will be acknowledged within 48 hours by our team and an investigation started. We aim to provide our response within 28 days and let you know what remedial action will be or has been taken to address the complaint.

Radio VCA88.5FM recognises that online lodgement may not always be suitable for everyone. The Complaints Officer may be contacted via confidential email.

Radio VCA88.5FM Complaints Officer
Email: complaints@vcaf.com.au

If your complaint pertains to the Complaints Officer, please send a confidential email to the President at chairman@vcaf.com.au

6. Role of the Complaints Officer

The Complaints Officer provides a single point of contact for all feedback, complaints or concerns. They will acknowledge receipt, review and categorise each complaint, and delegate or escalate it as appropriate, based on Radio VCA88.5FM's structured approach to manage complaints.

Their role is to guide and help the person raising the complaint at each stage of the process, and function as liaison between all parties. They are not the complainant's advocate but can work with them to understand the issue and get information needed to deal with the complaint.

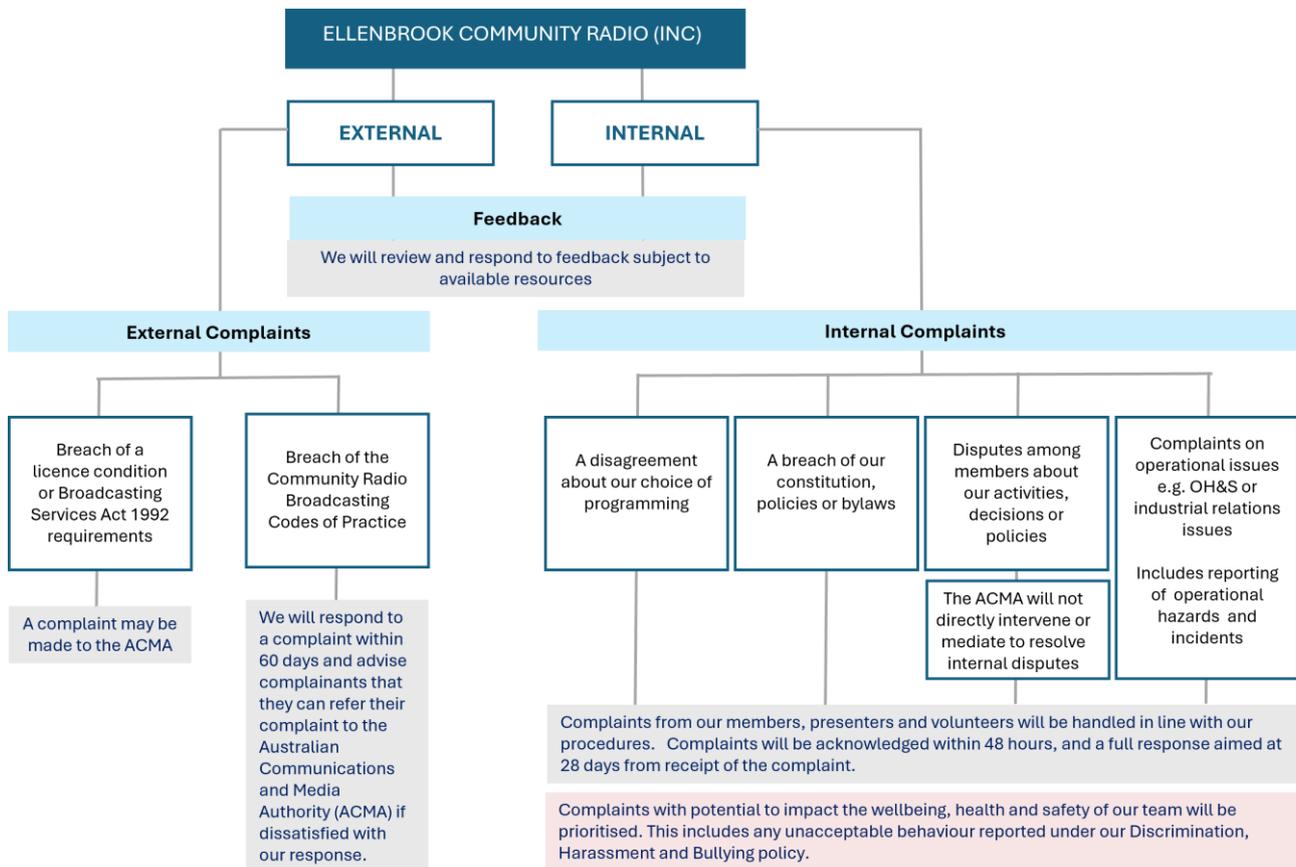
The Complaints Officer will not be involved in formal investigations or determining the outcome or resolution of an issue but will oversee the evaluation and post-resolution processes; and maintain records on behalf of Radio VCA88.5FM.

The Complaints Officer is nominated by and reports directly to the Management Committee.

7. Structured Approach to Handling Complaints

Radio VCA88.5FM is committed to addressing and resolving complaints in a fair and timely manner. This procedure outlines the steps for handling a complaint on both an informal and formal basis. Informal complaints can often resolve through direct communication and mutual understanding, while formal complaints involve a structured approach involving documentation, investigation and mediation.

Complaints can range from minor issues, such as misunderstandings or miscommunications, to more serious concerns, including harassment or discrimination. Complaints are categorised as illustrated below, with priority given to issues posing significant risk to individuals or the organisation. This helps ensure limited resources are appropriately allocated.



The manner in which a complaint is managed will be determined by the nature and seriousness of the complaint or decided by Radio VCA88.5FM in consultation with the complainant.

Under Code 10.8 of the Community Radio Broadcasting Codes of Practice, Radio VCA88.5FM is not required to resolve a complaint if it is frivolous, without sufficient grounds or not made in good faith; offensive or vulgar; is the second or later complaint in a series of complaints from a single person about the same issue; or where it expressly indicates a response is not required. We will keep a record of such complaints and the decision not to respond. Complaints submitted anonymously will generally not be considered, except where Radio VCA88.5FM deems it necessary due to the seriousness or nature of the issue.

Priority Complaints

- **Unacceptable Behaviour**

Complaints of unacceptable behaviour as described in the **Discrimination, Harassment and Bullying Policy** or any complaint that has potential to escalate quickly and impact the wellbeing, health and safety of our members, presenters and volunteers will be prioritised due to the seriousness. They must be reported immediately to the Complaints Officer. Note, any instance of assault, including sexual assault, will be immediately reported to the police.

- **Operational Hazard or Incident**

It is everyone's responsibility to identify and report hazards (actual or potential) and incidents relating to the station's operations, equipment and business activities. A hazard is defined as any situation, condition, or thing that has the potential to cause harm to people, property, or the environment. Examples of hazards at a radio station could include, but not limited to, electrical issues, ergonomic concerns, fire risks, noise levels, trip and fall hazards, psychosocial factors, biological risks, and security hazards.

All incidents resulting in injury or damage must be reported immediately to the Complaints Officer.

If you identify a hazard that requires immediate attention due to its potential to escalate quickly and impact the wellbeing, health and safety of our members and volunteers, please contact the Complaints Officer. Where there is no immediate threat, the hazard may be reported via the website. Radio VCA88.5FM will assess the hazard and implement necessary control measures including but not limited to repair or replacement.

External Broadcasting Related Complaints

If your complaint relates to a breach of the **Community Radio Broadcasting Codes of Practice**, this should first be addressed to Radio VCA88.5FM. We are required to respond to you in writing within 60 days, subject to receipt of your contact details. If you do not hear from us or if you are dissatisfied with our response, you are entitled to refer your complaint to the Australian Media and Communications Authority (ACMA). Complaints relating to our broadcasting licence conditions or a breach of the Broadcasting Services Act 1992 may be addressed to us or made directly to the ACMA.

Please note the ACMA does not get involved in internal or operational complaints.

ACMA Customer Service Centre

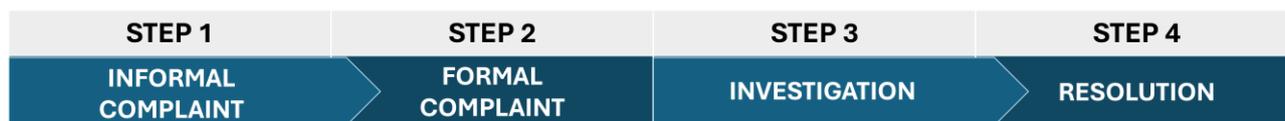
Ph: 1300 850 115

Email: info@acma.gov.au

<https://www.acma.gov.au/complain-about-program-tv-or-radio>

8. Handling a Complaint

Radio VCA88.5FM follows a four-step process.



Step 1: Informal Action

In most situations, an issue can be resolved informally. This may be where an issue has arisen from a misunderstanding or miscommunication. If comfortable doing so, address the issue directly with the person concerned, by identifying and explaining that the behaviour is unwelcome (or offensive, unfair, unethical or unsafe) and ask that the behaviour stops. It may be that the person was not aware that their behaviour or actions were causing an issue.

If the behaviour or issue persists after speaking to the person concerned, please raise and discuss the issue with the Complaints Officer who in the first instance will be able to offer support and guidance by explaining options for moving forward, and seeking to understand your preferred outcome.

The Complaints Officer will be able to escalate or direct the issue to the appropriate department or person within Radio VCA88.5FM to investigate and respond, and, in most cases resolve the issue informally.

Step 2: Formal Action

If the informal process has been pursued and a satisfactory outcome is not achieved, or it is determined that an informal process is not appropriate, a formal complaint may be lodged. The objective of the formal process is to establish whether the alleged conduct is substantiated and to recommend action.

If you are making a formal complaint you will need to provide us with detailed information in writing. The formal complaint will be acknowledged within 48 hours by the Complaints Officer. The complaint will be initially assessed by the Complaints Officer and directed or delegated to the appropriate department or person within Radio VCA88.5FM to investigate and respond.

Complaints of a serious nature will be escalated to the Management Committee for investigation where necessary.

Complaints Review Committee & External Investigation

The Management Committee reserves the right to:

- Appoint external investigators; or
- Establish an internal sub-committee (Complaints Review Committee)

on a case-by-case basis, to investigate or manage member complaints where, in its discretion, such action is warranted. Grounds for such an appointment may include, but not limited to, the seriousness and complexity of the matter, the need for impartiality, absence of bias, the requirement for expert input, or limitations in time or resources.

For clarity within this Policy, a Complaints Review Committee may be constituted as a sub-committee pursuant to Radio VCA88.5FM's Constitution (Part 5, Division 4, Rule 50) and operates in accordance with the terms of reference determined by the Management Committee (having regard to the indicative Terms of Reference). Except where otherwise specified in the Constitution, the Management Committee may delegate to a Complaints Review Committee (Part 5, Division 4, Rule 51) all powers vested in the Management Committee including to investigate, make findings, make recommendations in relation to complaints or disputes that are referred to the Complaints Review Committee. Except where the Management Committee determines otherwise, a Complaints Review Committee would not have authority to make binding decisions or enforce disciplinary actions on behalf of the Management Committee or Radio VCA88.5FM.

Prior to appointing a person to a Complaints Review Committee, the Management Committee will assess the criteria set out in the indicative Terms of Reference, including potential conflicts of interest to ensure the integrity and fairness of the process.

Step 3: Formal Investigation

An investigation typically involves collecting information about the complaint and making a finding based on the available information as to whether or not the alleged behaviour occurred. Radio VCA88.5FM will comprehensively and accurately document all information. Throughout the investigation process, all affected parties will be kept updated through the Complaints Officer. The Complaints Officer will not take part in the investigation but will function as liaison between the affected parties.

Confidentiality

Radio VCA88.5FM will endeavour to maintain confidentiality as far as possible. However, it may be necessary to speak with other members or witnesses as part of our investigations to determine what happened, to afford fairness to those against whom the complaint has been made, and to resolve the complaint.

All parties involved must also maintain confidentiality, including the complainant. Spreading rumours or gossip may expose Radio VCA88.5FM and individuals to a defamation claim. Parties may discuss the complaint with a designated support person or representative (who is not affiliated with Radio VCA88.5FM), however the support person or representative must also maintain confidentiality.

Step 4: Resolution

Where a formal investigation is completed by a Complaints Review Committee, subject to the terms of appointment and delegation by the Management Committee, they will report their findings to the Management Committee and provide recommendations for consideration. The Management Committee will make a final determination including approving remedial works and addressing root causes to the complaint. The final determination will be communicated to the affected parties.

Resolution options could include, but not limited to, a combination of the following:

- repair or replacement for operational complaints
- changes in policy and procedures
- training for either or both parties
- formal apology or undertaking that unacceptable behaviour will cease
- counselling for either or both parties
- official warning and/or disciplinary action (including termination of membership)

Where a complaint is complex or challenging and cannot be resolved internally, alternate dispute resolution (ADR) options will be considered and discussed with the affected parties. These may include:

- Mediation process where the relevant parties agree a mutually acceptable resolution with assistance from an external mediator.
- Arbitration process where the relevant parties accept resolution decided by an external arbitrator. The arbitrator's decision is binding and legally enforceable.

It is important to note that in certain circumstances both parties to a complaint may be subject to disciplinary action. The same applies for any third-party who may be involved or contributed to circumstances leading to the complaint where a breach of the station's policies and procedures occurs. In addition, any person found to have brought a frivolous, fabricated, or vexatious complaint may be subject to disciplinary action.

9. Post Resolution Check-in and Feedback

The Complaints Officer will monitor the situation post-resolution to ensure that the complainant is satisfied with the outcome, and that things are working smoothly again. A follow-up discussion may be held with the complainant to check on wellbeing, and to ensure the issue or unacceptable behaviour has ceased with no recurrence or victimisation. The Complaints Officer will also seek feedback to improve the process.

10. Record Keeping

All complaints and outcomes will be recorded in the Complaints Register and retained by Radio VCA88.5FM for at least 2 years. Any program which is the subject of a complaint will be retained for 60 days. The Complaints Register will be held securely by Radio VCA88.5FM's Secretary with access restricted to the Management Committee only. Records will be available for inspection by the ACMA if requested.

11. What should I do if I do not agree with a decision/resolution?

If you are not satisfied with the manner in which Radio VCA88.5FM has dealt with your complaint, please let us know. We are happy to review our procedure and decisions in light of additional information. Alternatively:

- for internal complaints, members, presenters and volunteers have a right to appeal and may escalate the matter by following the station's Constitution (Part 4 – Disciplinary Action, Disputes and Mediation). A copy of the Constitution is available on our website.
- for complaints relating to a breach of the **Community Radio Broadcasting Codes of Practice**, our licence conditions, or the Broadcasting Services Act 1992, you can take the matter further by submitting a written complaint to the Australian Media and Communications Authority.
- for complaints relating to discrimination, harassment and bullying, you may escalate the issue to an external agency, such as the Anti-Discrimination Board, the Australian Human Rights Commission or the Fair Work Commission.
- If you think the matter involves an issue of civil law, you will need to obtain your own legal advice at your cost.
- If you think there has been a breach of criminal law, you should take your complaint to the proper authorities.

12. Policy Owner & Version Control

Policy Owner	Ellenbrook Community Radio (Inc) t/a Radio VCA88.5FM: Secretary
Next Review Date	This Policy will be reviewed annually or following significant changes in legislation or station operations.
Endorsed By	

Version	Status	Date	Description/Sections Modified
V2	Adopted	13 October 2025	Final Version