



CONFLICT OF INTEREST POLICY & PROCEDURE

1. Introduction

Ellenbrook Community Radio (Inc) trading as VCA88.5FM (Radio VCA88.5FM) is committed to making decisions and actions that are in the station's best interest, and free from undue influence or bias. The ***Conflict of Interest Policy*** ensures transparency, integrity and accountability, protecting us from potential legal and ethical issues. This maintains our reputation and ensures fair and impartial operations.

2. Purpose

The purpose of this ***Conflict of Interest Policy*** (Policy) is to establish guidelines to effectively identify, disclose, regularly assess and manage any actual, potential or perceived conflict of interest that may arise during tenure with Radio VCA88.5FM. The Policy ensures transparency, impartiality, manages risk and protects the integrity of Radio VCA88.5FM, all of which underpins public trust in the station's operations.

3. Scope of Policy

For the purpose of this Policy, the following definitions apply:

Conflict of Interest: a conflict of interest occurs when personal interests (financial and non-financial) potentially influence judgement or impartiality and conflicts with an individual's responsibility to act in the best interests of Radio VCA88.5FM. Personal interests include direct interests, as well as those of family, friends or other organisations a person may be involved with or have an interest in (indirect).

Related Party & Related Party Transactions: a related party refers to any individual or entity that has a pre-existing business relationship or common interest with an organisation with potential to influence decisions. A related-party transaction is any financial transaction, arrangement, or relationship between an organisation and a related party. While related-party transactions are legal, they carry the potential for conflicts of interest and are subject to regulatory scrutiny to ensure transparency and fairness.

It's important to emphasise that conflicts of interest in and of themselves are neither positive nor negative. Conflicts of interest and related party transactions are common and do not present a problem if they are openly and effectively managed and in the best interests of Radio VCA88.5FM.

This Policy applies to:

- All members, presenters, volunteers, contractors and sponsors at Ellenbrook Community Radio VCA88.5FM.
- Any actual, potential or perceived conflict in relation to programming and content, sponsor management, commercial activities, operational matters, social media, any decision-making process and governance on behalf of Radio VCA88.5FM.

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

- Advertising, Sponsorship & Marketing
- Code of Conduct
- General Principles
- Presenter Code of Conduct
- Social Media & Media Engagement Policy

4. Consequences of Conflicts of Interest

It's important to disclose and manage a conflict of interest to prevent potential harm to any business, organisation, or individual. Some examples of this are:

- **Legal liability:** Conflicts of interest may lead to legal consequences where it violates laws, regulations, or ethical standards, potentially resulting in fines, penalties, or legal actions.
- **Damage to reputation:** Conflicts of interest can tarnish an individual's or organisation's reputation, cause public distrust and negatively impact their standing within the community or industry.
- **Loss of credibility and trust:** Failure to disclose a conflict can erode the trust and confidence others have in the person or entity involved, leading to loss of credibility and reliability.
- **Financial loss:** Conflicts of interest may result in financial loss where decisions are based on personal interests rather than the best interests of the organisation leading to poor outcomes and decreased financial performance.

5. Identifying if you have a Conflict of Interest

Recognising conflicts of interest is applicable to everyone, not just those in positions of authority or decision-making roles. Financial interests are foremost in the public mind, but other interests may also be relevant so it's about spotting situations where personal interests might influence your actions and decisions and where it might affect Radio VCA88.5FM and its operations. Being aware of the more common types of conflicts can help in assessing these situations and keep things running smoothly and ethically.

- **Financial Conflicts:** Occurs when an individual or entity stands to gain financially from decisions made in their professional capacity that may not be in the station's best interests.
- **Commercial & Vendor Conflicts:** Personal or financial relationships with vendors or suppliers, or sponsors, can lead to biased decision-making and unfair practices.
- **Personal Conflicts:** Family and friendships, affiliations or personal relationships formed through work or engagement with the local community, including sporting, social, cultural or voluntary activities which may influence decisions, compromise objectivity or lead to preferential treatment.
- **Professional Conflicts:** Outside employment, dual-roles, volunteer, board or advisory roles (paid or unpaid) or activities that may create a competing business interest.
- **Confidential Conflicts:** Using confidential information for personal gain or to benefit another party.
- **Gifts and Hospitality Conflicts:** Accepting gifts or benefits from clients, suppliers, or competitors can create a perception of bribery and influence decisions.
- **Political and Social Activism Conflicts:** Involvement in political activities or affiliations that could influence business decisions or public perception has potential to affect the neutrality and credibility for the station.
- **Social Media Conflicts:** Expressing personal opinions or engaging in activities on social media platforms that conflict with station objectives or official stance/policies could create a public perception of bias or lack of professionalism, potentially harming the station's reputation.

6. Media Specific Conflicts to Consider

Broadcasting and sponsorship conflicts can significantly impact the integrity and credibility of Radio VCA88.5FM. Here are some common scenarios that presenters and those involved in programming, advertising and sponsor management may need to know:

Broadcasting Conflicts

- **Content Bias:** When content is influenced by external pressures, such as advertisers or political entities, it can lead to biased reporting. This compromises the station's objectivity and trustworthiness.
- **Editorial Independence:** Conflicts can arise when there is a lack of clear separation between the editorial team and the business side of the station. For example, if advertisers have a say in the content being broadcast, it can lead to a conflict of interest.
- **Competing Interests:** Presenters who work for multiple media outlets might face conflicts in how they present information. This can lead to biased reporting or favouritism towards one outlet over another.
- **Personal Relationships:** Personal relationships between broadcasters and individuals or entities they report on can create conflicts. For instance, a host might give preferential treatment to a friend or family member during interviews or coverage.

Sponsorship Conflicts

- **Influence on Content:** Sponsors might try to influence the content being broadcast to align with their interests. This can lead to biased reporting or the omission of important information that might be unfavourable to the sponsor.
- **Exclusive Deals:** Exclusive sponsorship deals can create conflicts if they limit the station's ability to cover certain topics or events. For example, a radio station might avoid covering a competitor's event due to an exclusive sponsorship agreement.
- **Transparency Issues:** Lack of transparency about sponsorship deals can lead to conflicts of interest. Listeners might feel misled if they are not aware that certain content is sponsored or influenced by external entities.
- **Ethical Concerns:** Sponsorship from entities with questionable ethics or practices can create conflicts. For example, a radio station sponsored by a company with a poor environmental record might face backlash from listeners who value sustainability.

Please refer to Radio 88.5FM's *Advertising, Sponsorship & Marketing Policy* which provides clear guidelines for advertising and sponsorship in relation to Radio VCA88.5FM and its business and community activities.

Social Media Conflicts

Conflicts of interest around social media can be quite significant for public-facing entities like radio stations. Here are some common scenarios:

- **Endorsements and Sponsorships:** Endorsing products or services on personal social media accounts where some form of compensation or benefit is received could create a conflict of interest, especially if the products or services conflict with the station's programming or sponsors, or not aligned with the station's values.
- **Personal Opinions vs. Professional Role:** Sharing personal opinions on social media may conflict with the radio station's official stance or policies. This can potentially harm the station's reputation.
- **Confidential Information:** Sharing confidential or proprietary information on social media, either intentionally or unintentionally, can create conflicts of interest. This could include details about

upcoming programs, internal decisions, or sensitive business strategies.

- **Relationships with Followers:** Developing personal relationships with followers can lead to biased interactions or decisions. For instance, a presenter might give preferential treatment to certain listeners or followers, affecting the station's impartiality.
- **Political and Social Activism:** Active involvement in political or social causes on social media might create conflicts if the activism is perceived as representing the station's views. This can be particularly sensitive in a diverse audience environment.
- **Competing Interests:** Promoting or interacting with content from competing radio stations or media outlets on personal social media accounts could create a conflict of interest, especially if it undermines the station's competitive position.

Please refer to Radio 88.5FM's ***Social Media and Media Engagement Policy*** which provides clear guidelines for social media use in relation to Radio VCA88.5FM and its business and community activities.

7. Disclosing a Conflict of Interest

Radio VCA88.5FM's disclosure procedure is outlined below. If unsure you have a conflict of interest, it is better to err on the side of caution and disclose it for evaluation.

- **Proactive Disclosure:** New members and presenters will be asked to disclose potential conflicts of interest at the time of joining the station.
- **Ongoing Assessment:** Members and presenters should regularly assess their circumstances to identify and disclose any emerging conflicts, or if a conflict has resolved itself. Where there is a change, please notify Radio VCA88.FM within 14 days of that change.
- **Annual Review:** Members and presenters will be reminded to update their conflicts of interest position on an annual basis at time of renewing their membership.

To disclose a conflict of interest, please contact the Secretary via email admin@vcafm.com.au with the email subject line "Confidential Member COI".

8. Evaluating and Managing Conflicts

Avoiding conflicts is preferable, but in practice there may be situations where a conflict of interest cannot be wholly avoided and needs to be managed in a way that will withstand external scrutiny.

Where a conflict (either actual, potential or perceived) has been disclosed, the Chairperson and Secretary of the Management Committee will evaluate the potential impact and duration of the conflict, the circumstances of the individual, and the role and responsibility the person performs at Radio VCA88.5FM. The Chairperson and Secretary will consider how to manage the conflict, considering all relevant circumstances and seeking legal advice as appropriate before deciding. The Chairperson and Secretary will decide to what extent other Management Committee members should be made aware of and/or involved in discussions around how to manage the conflict.

A risk management plan will be discussed in consultation with the person who holds the conflict. The plan will outline any conditions or limitations necessary to reasonably manage the conflict of interest including but not limited to:

- **Recusal:** the member or presenter must recuse themselves from any decisions or activities directly related to the conflicting interest;
- **Mitigation:** steps may be taken to mitigate the conflict, such as obtaining approval from Management or implementing safeguards to ensure impartiality; and

- **Transparency:** conflicts pertaining to programming, commercial advertising and endorsements, sponsorships or social media activity may need to be publicised through appropriate channels such as program announcements or the station's website to ensure full transparency.

In exceptional circumstances where a conflict is considered material and cannot be managed, the conflicted party may need to consider eliminating the conflict or resigning membership from Radio VCA88.5FM.

9. Committee Conflicts of Interest

In addition to the disclosure process outlined in Section 7 of this Policy, Committee members are also required, at the beginning of each Management Committee, to declare any conflicts of interests or related party disclosures pertaining to the meeting agenda items. This requirement is built into each meeting agenda as a standing item.

Where new conflicts are identified or arise at a meeting, the Committee Chairperson (or a delegate member if the Chairperson is conflicted) will consult with the non-conflicted Committee members to determine the appropriate course of action including whether conflicted members should:

- Vote on the matter (this is the minimum);
- Participate in the discussions or debate; or
- Be present in the room during the debate and voting.

In deciding what approach to take, the non-conflicted Committee members will consider:

- whether the conflict is material and needs to be avoided, or simply documented;
- whether the conflict realistically impairs the Committee member's ability to participate impartially in decision-making;
- alternative options to avoid the conflict;
- Radio VCA88.5FM's objectives and resources; and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of Radio VCA88.5FM.

The recommended action must be agreed by a majority of the Committee (excluding conflicted member/s) who are present and voting at the meeting. If a decision is made that further legal advice is required, the discussion and/or voting on that issue will be postponed until legal advice has been obtained.

Any disclosed conflicts and actions taken will be recorded in the meetings minutes and within the Register of Interests. Where a conflicted Committee Member was recused from the meeting on a relevant item, they will receive a sub-set of minutes and papers with the relevant item redacted.

10. Recording Conflicts & Access

Radio VCA88.5FM will record all identified and disclosed conflicts of interest within a Register of Interests. The register must record information relating the nature and extent of the conflict, and steps taken to manage the conflict. The Register of Interests will be held and maintained by the Secretary. Full access to the Register will be restricted to the Management Committee, however limited access may be required in certain circumstances and on a "needs to know" basis subject to written approval by Radio VCA88.5FM's President.

11. Consequences of Breaching this Policy

Breaches of this Policy may result in disciplinary action being taken up to and including termination of membership.

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
V1	Adopted	13 October 2025	Final Version