

1 PURPOSE

The purpose of this Policy is to ensure that Sonshine complies with the terms of its community broadcasting licence, the Broadcasting Services Act 1992 (“Act”) and the Community Radio Broadcasting Codes of Practice in managing and responding to complaints from its listeners and on-line content audience.

2 COMMUNITY RADIO BROADCASTING CODES OF PRACTICE

The Community Radio Broadcasting Codes of Practice (“Codes of Practice”) are made by the Community Broadcasting Association of Australia in consultation with the ACMA. Sonshine is legally obliged to comply with the Codes of Practice and as an overarching document they will necessarily inform all of Sonshine’s Policies.

3 GUIDING PRINCIPLE IN MANAGING COMPLAINTS

We must start from the premise that in most cases a person would not bother to make a complaint unless they held a genuine interest in Sonshine and felt that they had legitimate concerns. With this in mind, we must treat all complaints from our audience in a professional and polite manner, and we should not be dismissive of any person making a complaint. On the contrary, the complainant should be thanked for taking the trouble to get in contact and be assured that their complaint will be taken seriously and will be dealt with professionally in accordance with this Policy.

4 LEGAL FRAMEWORK

4.1 The Act necessarily informs this Policy and encourages the provision of a means for addressing complaints about broadcasting services is one of its stated objectives. To this end Part 11, Division 1 of the Act sets out the provisions which enable a person to make a complaint either:

- directly to the Australian Communications and Media Authority (“ACMA”) if a complaint is about a breach of a licence condition or a breach of the Act; or
- to the licensee in the first instance if the complaint is about a breach of the Codes of Practice.

4.2 The Codes of Practice also inform this Policy and Code 10 provides that, amongst other things, the licensee must:

- ensure that complaints are handled fairly, objectively and confidentially;
- have a complaints policy and procedure that clearly sets out the different ways to deal with complaints that allege a breach of the Code, a licence condition or the Act;
- provide clear and prominent information about how to make a complaint, including a direct link to a complaints section on the licensee’s website;
- provide the complainant with the outcome of the complaint and reasons for decisions as soon as practicable, but at the latest within 60 days;

- inform the complainant that they can refer their complaint to ACMA if they are not satisfied with the licensee's response;
- keep a record of complaints and responses for at least 24 months; and
- keep a recording of any program that is the subject of a complaint for 60 days.

5 POLICY

5.1 Sonshine acknowledges the right of its community of interest and audiences to make complaints:

5.1.1 directly to the station concerning:

- compliance with the Codes of Practice;
- compliance with its broadcasting licence conditions or the Act;
- on-air and online content and programming; and
- the service Sonshine provides to its community of interest; or

5.1.2 directly to ACMA if the complaint concerns a breach of a licence condition or a breach of the Act.

5.2 Sonshine will broadcast at least one on-air announcement each week that contains information about the Codes of Practice and where listeners can obtain a copy.

5.3 Sonshine will use its best endeavours to investigate and resolve every complaint it receives except if:

- it is frivolous, vexatious or an abuse of the complaints process;
- it is offensive or vulgar;
- it is a repeat of a complaint made by the same person about the same issue which has already been resolved; or
- it is expressly made clear by the complainant that a response is not required.

5.4 Sonshine will respond to complaints received by letter, email or from its website complaints link by referring those complaints in the first instance to the Mission Director and the following process will then be followed:

5.4.1 **Acknowledgement of complaint:** The complainant will be provided with a written acknowledgement of their complaint within 5 days of Sonshine receiving it. If the complaint concerns a breach of Sonshine's broadcasting licence or a breach of the Act, the acknowledgement will inform the complainant of their right to complain directly to ACMA and will provide the complainant with contact details for ACMA.

5.4.2 **Investigative action:** This may involve checking the logged program material, online material or discussing the complaint with on-air announcers and content producers.

- 5.4.3 **Response to complainant within 60 days:** This will be in writing in the first instance setting out the outcome of the complaint and reasons for decisions and/or action taken with subsequent follow-up by telephone call (or meeting if appropriate). The written response will provide contact details for ACMA and inform the complainant that they may refer their complaint to ACMA if they are not satisfied with Sonshine's response.
- 5.4.4 **Record complaint and maintain a record of complaints:** Sonshine will keep a record of complaints in the original format received together with its response to each complaint for at least 24 months. The record will include:
- the outcome of any investigative action;
 - whether the complaint or any aspect of it was substantiated;
 - any recommendations arising from the complaint; and
 - any outstanding actions to be followed up.
- 5.4.5 **Keeping material and making it available to ACMA:** Sonshine will keep all material relating to complaints, including logging tapes or audio copies of broadcast material and any other relevant written documentation for a minimum period of 60 days from the date that a response is given to the complainant or for any longer period specified by ACMA. The record of complaints and any relevant material will be made available to ACMA on request.
- 5.4.6 **Keeping the Board informed:** The Mission Director will promptly keep Sonshine's board informed and updated with respect to any complaint which:
- remains unresolved after investigation and responding to the complainant; and/or
 - is referred to ACMA for further investigation and resolution.

Document Details

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Owner	CEO
Approved by	Board
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Document Version Control

Version	Version Date	Amendment Details
0	25/11/2025	Original approved Policy

Related Documents

Document Type	Document Name
	Community Radio Broadcasting Codes of Practice – Code 10 Broadcasting Services Act (Cth) 1992
Policy	1.1 On-air Presenters & Guests Policy 1.2 Programming Policy 1.3 Sponsorship Policy