



POLICY DOCUMENT 4.2.1[a]

Policy Name (full)	Policy – Community Needs and the Act
Policy Family	4 – Programming
Version/Date	V1.0 1 October 2019
Maintained By	Programming Subcommittee

PRECIS	Lofty's interpretation of the phrase "community needs" as set in section 84(2) of the Broadcasting Services Act 1992 (Cth).
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Introduction

As the name suggests, community radio's *raison d'être* is to provide a broadcasting service to the community. This requirement is legislated in section 84(2) of the Broadcasting Services Act 1992 (Cth) ["the Act"], with ACMA providing an interpretation of the phrase "community needs" as part of the Community Broadcasting Participation Guidelines 2010 [the Guidelines].

This policy explains how Lofty interprets the phrase *community needs* in terms of both the Act. Details of Lofty's approach to meeting community needs commensurate with the Guidelines is documented in Policy 4.2.1[b].

The Act

Section 84(2) states:

In deciding whether to allocate a community broadcasting licence that is a broadcasting services bands licence to an applicant or to one of a group of applicants, the ACMA is to have regard to:

- (a) the extent to which the proposed service or services would meet the existing and perceived future needs of the community within the licence area of the proposed licence; and*
- (b) the nature and diversity of the interests of that community; and [...]*
- (c) the nature and diversity of other broadcasting services (including national broadcasting services) available within that licence area [...]*

In simple terms, Lofty's programming (referred to in the Act as "material") is designed to *complement and supplement* that which is available via other broadcasters within Mount Barker RA1. Lofty uses a number of mechanisms to establish whether current or proposed material meets community needs. Said mechanisms are detailed in policy 4.2.1[b].

To complement and supplement

Section 84(2)(c) suggests that as part of the community broadcasting licence application process, ACMA is to have regard for the nature and diversity of other services within Mount Barker RA1.

In order to do this, Lofty needs to consider which broadcasters currently provide a service within Mount Barker RA1. Firstly, consideration needs to be given to the nature of each broadcaster's programming. Secondly, consideration needs to be given as to the points of difference between Lofty's programming and that of other broadcasters.

Existing and proposed broadcasting services in Mount Barker RA1

Overlapping radio and television services	Category of broadcasting service	Nature of programming
Radio services		
5ABCFM 103.9 MHz	National	ABC classic FM—classical music
5ABCRN 729 kHz	National	ABC Radio National – general programming with a local and national perspective including news, information and entertainment
5AN ABC Adelaide 891 kHz	National	ABC Local Radio (Adelaide) - general programming with a local perspective including news, information and entertainment
5JJJ 105.5 MHz	National	Triple J—Youth contemporary music and programming
5PB ¹ 972 kHz	National	ABC News—news programming
5SBSFM 106.3 MHz	National	Multilingual programming including news, education and entertainment
5EZY ² 100.3 MHz	Commercial	General programming including news, information and entertainment
5MU 94.3 kHz	Commercial	General programming including news, information and entertainment
5LCM ³ 88.9 MHz	Community	Representing the general community interest

Points of difference

It is clear that – on paper – there is a degree of overlap between several national broadcasters, as well as the local commercial broadcasters. In practice, each broadcaster has their own programming goals, along with their own policies and procedures to enable their respective goals to be met.

Lofty’s *raison d’etre* is to provide a service that is progressive and diverse, meeting its brief via community engagement and filling niches that other broadcasters are not able to fill. As such, Lofty’s programming policies in general – and music policies in particular – are designed to provide clear demarcation between Lofty’s sound and that of our fellow Mount Barker RA1 broadcasters.

How to differentiate

When assessing a program’s compatibility with Lofty, we start with one question:

Is there any other broadcaster in Mount Barker RA1 airing similar programming?

If the answer is “no”, then this program deemed to be *different* to other material airing in Mount Barker RA1. If the answer is “yes”, “maybe”, “sorta” or “a bit”, similarities and differences need assessment.

¹ On-air identity is ABC News Radio.

² On-air identity is Power FM.

³ On-air identity is Lofty 88.9

“Is any other broadcaster [...] airing similar programming”	Lofty’s response and next actions
<p>“No”</p>	<p>The proposed material is different to anything else currently on air in Mount Barker RA1.</p> <p>Whilst not a guarantee that said proposal will be added to Lofty’s programming schedule, programming of a different nature has a clear advantage over that which overlaps that of other broadcasters.</p> <p>Details of the differences are to be confirmed and documented as per usual programming proposal and assessment procedures.</p>
<p>“Maybe”</p> <p>“a bit”</p> <p>“kinda”</p> <p>“sorta”</p> <p>“yeah nah”</p> <p>etc.</p>	<p>Further assessment is required to establish if the proposed material complements and supplements other available programming.</p> <p>Many programs that display similar characteristics of those on air elsewhere in Mount Barker RA1 may complement and supplement said programming.</p> <p>As an example, Lofty’s current weekly schedule includes several science programs. ABC RN also airs science programming, however Lofty’s science programming complements and supplements ABC RN’s output by avoiding scheduling conflicts.</p> <p>Another factor is how the subject matter is framed. Consider the following science programs:</p> <ul style="list-style-type: none"> • “Diffusion”, a science program that explores the relationships between science, culture, politics and the arts. • “Lost in Science”, a science program that provides a platform for scientists to geek out on their particular scientific interest or discipline. • “Spectrum”, DW’s flagship science program. Whilst there may be similarities to ABC RN’s Science Show, DW’s global footprint allows them to focus on stories that may fall outside of ABC RN’s wheelhouse, thus creating a source of differentiation.
<p>“Yes”</p> <p>“pretty much”</p> <p>“exactly the same”</p> <p>etc.</p>	<p>At best, this material may be similar to other programming available in Mount Barker RA1.</p> <p>The Programming Subcommittee shall work with the Proposer of similar material in an attempt to assist the Proposer to create as much differentiation as possible, therefore allowing said program to complement and supplement other available content.</p> <p>Should the Programming Subcommittee and the Proposer fail to reach consensus on the differentiation of the proposed material, the Programming Subcommittee is to decline the proposal.</p> <p>Where a proposal is declined, justification is to be documented by the Programming Subcommittee should the Proposer seek a review of said decision.</p> <p>The Proposer shall not be discouraged or excluded from submitting future programming proposals.</p>



POLICY DOCUMENT 4.2.1[b]

Policy Name (full)	Policy – Community Needs and the Guidelines
Policy Family	4 – Programming
Version/Date	V1.0 22 February 2019
Maintained By	Programming Subcommittee

PRECIS	Lofty’s interpretation of the phrase “community needs” as set in the Community Broadcasting Participation Guidelines 2010.
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Introduction

As the name suggests, community radio’s *raison d’être* is to provide a broadcasting service to the community. This requirement is legislated in section 84(2) of the Broadcasting Services Act 1992 (Cth) [“the Act”].

This policy explains how Lofty interprets the phrase *community needs* in terms of section 7 of the Community Broadcasting Participation Guidelines 2010 [“the Guidelines”].

The Guidelines and how they are applied to identifying community needs

Section 7 of the Guidelines provides detailed information on how a community broadcaster may identify community needs for the purposes of providing a community broadcasting service.

7.2 HOW CAN LICENSEES IDENTIFY COMMUNITY NEEDS?

There are a number of methods suggested by the Guidelines.

Guidelines method	Application of method by Lofty
Surveys, questionnaires and online polling	Lofty uses data compiled via the CBAA/McNair yellowSquares National Listener Survey. Lofty expects to commission its own surveys in the future.
Suggestion boxes	A physical suggestion box is located at Lofty’s studio.
Focus groups	Lofty expects to run focus groups in the future.
Audience and community feedback through letters, electronic communications (SMS or email, for example) and a station website; Audience requests	Lofty encourages feedback from the community, and has received feedback via phone, email, instant messaging and via the contact form at lofty.org.au. Lofty expects to adopt additional mechanisms to facilitate audience and community feedback as said mechanisms become available.
Discussions with community groups and representatives	Lofty has sound working relationships with a number of community and sporting groups, as well as with Local Government.
Analysing census data for the licence area	Lofty uses the free version of the Census TableBuilder service provided by the ABS. This has enabled Lofty to build a customized geographical profile based on census data pertaining only to Mount Barker RA1.

In addition to outlining methods in which the community can express needs, Guideline 7.2 also defines factors for consideration during the needs identification process.

Guidelines factor	Consideration of factor by Lofty
(To) canvas the needs and expectations of people in the community within their licence areas, not just their audiences or members and volunteers who are already actively involved with the station	Lofty has created a position on its Programming Subcommittee for a non-member Community Representative. A Community Representative is selected by Lofty and serves for a fixed term as set out in Policy 1.2.4. Lofty regularly canvases feedback directly from listeners via on-air promotions and social media posts. Our website (lofty.org.au) features an online feedback form.
(To) encourage suggestions for improvements to their service	Lofty airs CBAA Code Announcements several times a day; a much higher frequency than the minimum stipulated in the Code. When a specific community need has been identified but is yet to be confirmed, Lofty may air specific announcements targeting community feedback on said need. Lofty also solicits feedback via target social media advertising campaigns (viz. Facebook) from time to time.
(To) design questions to elicit full and honest responses	When designing a bespoke survey, Lofty keeps closed questions to a minimum. Semi-open questions (answerable via multiple choice questions with an option to elaborate on the option(s) selected via a free-form text box) and open questions (answerable via a free-form text box) allow Lofty to create surveys that encourage full and open responses with baked-in simplicity to the benefit of both the respondent and Lofty.
(To) identify whether respondents reside in the licence area or have some other connection to the licence area (for example, work or study in the licence area).	Lofty identifies respondents to surveys via postcode. Whilst we encourage respondents to give their postcode, we respect the respondent's privacy and therefore postcode is an optional question. Where a disclosed postcode falls outside of Mount Barker RA1, Lofty asks follow-up questions insofar as the respondent's connection to the licence area.
Discussions with community groups and representatives	Lofty has sound working relationships with a number of community and sporting groups, as well as with Local Government.
Analysing census data for the licence area	Lofty uses the free version of the Census TableBuilder service provided by the ABS. This has enabled Lofty to build a customized geographical profile based on census data pertaining only to Mount Barker RA1.

Empirical methods

Whilst the Guidelines set minimum standards relating to methodology for establishing community needs, Lofty may also employ a number of empirical methods to establish or confirm an identified community need.

One empirical method used to great effect during Lofty's online and temporary community broadcasting licence (TCBL) phases was the use of syndicated specialist music programming. This allowed Lofty to experiment with and simulate a wider variety of specialist music genres than otherwise possible during our startup phase.

As of writing, this method has led to the creation of at least one program of local significance. Several additional community needs have been identified due to positive audience feedback relating to other syndicated specialist music programming, with work underway to develop locally produced equivalents.

Case studies of how syndication has uncovered latent community needs are given in Appendices C and D of Policy 4.2.3.

7.3 ACHIEVING A DIVERSE AND REPRESENTATIVE PROGRAM SCHEDULE

Guideline 7.3 states "Licensees can often demonstrate a commitment to representing their community interest by broadcasting a range of programming that caters for the community's needs".

In order to achieve a diverse and representative program schedule, Guideline 7.3 documents the following diversity factors:

Diversity factor	Consideration of factor by Lofty
understand the profile of the community they are licensed to serve, for example, the linguistic diversity of a geographically-based community interest	Lofty updates its analysis of census data once newly released data is made available. This generally occurs around 12-18 months after a census is held. At the time of writing, the most recent data relates to the 2016 Census, thus being a trailing indicator. Lofty maintains a sound relationship with the Community Engagement team at Mount Barker District Council, as they are in a better position to provide a leading indicator of emerging linguistic diversity trends in Mount Barker RA1.
identify and review their community interest's programming preferences on a regular basis	Programming is regularly reviewed to ensure it remains aligned with community needs as part of the Programming Subcommittee's standard operating rhythm.
have clear policies and procedures for deciding the type and mix of programs	Policies and procedures are regularly reviewed by the Programming Subcommittee.
foster ties with relevant community groups and encourage their input into the program schedule	Lofty has a culture of instilling a sense of ownership within each of its members. This has led to our member base become some of Lofty's strongest advocates. Many Lofty members are also members of other community groups; thus opening up many great opportunities to develop authentic relationships with said groups.

Recording and reviewing how our programming meets community needs

As part of the program approval process, the Programming Subcommittee records their assessment on how community needs were determined.

Each program is subject to regular review by the Programming Subcommittee to ensure that said programming still meets its intended community needs, or may have led to other hitherto latent community needs being uncovered and fulfilled. Where changes have been made to a program based on shifting community needs, said changes are to be documents as part of the review process.

Both the initial assessment and reviews of each program are held in a central repository from which reports may be generated. Said reports may be used for compliance purposes (viz. as part of a licence renewal application or when otherwise requested by ACMA), as well as general internal or external reporting purposes.

Whilst not strictly necessary, Lofty's intention is to retain all programming proposals along with their community needs assessments and subsequent reviews in perpetuity. The rationale is that Lofty expects is expect to become a valuable cultural and community asset, therefore it behooves Lofty to retain records with expected future heritage value. This will allow Lofty's heritage to be observed and celebrated by future generations of Lofty members and volunteers, as well as the local community as a whole.



POLICY DOCUMENT 4.2.2

Policy Name (full)	Policy – Local significance
Policy Family	4 – Programming
Version/Date	V1.0 1 November 2019
Maintained By	Programming Subcommittee

PRECIS	Lofty's interpretation of the phrase "local significance" in the context of section 84 of the Broadcasting Services Act 1992 (Cth).
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Introduction

On 6 December 2017, the Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017 ["the Bill"] was introduced to the Senate and read for the first time. Subsequently, the Bill was passed by both the Senate and the House of Representatives on 22 August 2018, with the Bill assenting as Act 95 in the 2018 Parliamentary year.

The assent of the Bill led to a number of amendments to the Broadcasting Services Act 1992 (Cth) ["the Act"]. This policy confirms Lofty's interpretation of amendments to section 84 of the Act and sets a framework around how Lofty applies said interpretation when making programming decisions.

Scope and Context

Section 84 of the Act governs the allocation of community broadcasting licences. Paragraph (2) of section 84 states:

- (2) *In deciding whether to allocate a community broadcasting licence that is a broadcasting services bands licence to an applicant or to one of a group of applicants, the ACMA is to have regard to [...]*
- (b) *the nature and diversity of the interests of that community; and*
- (ba) *in the case of a community radio broadcasting licence—the extent to which the proposed service or services would provide material of local significance [...]*
- (3) *For the purposes of paragraph (2)(ba), material is of **local significance** if:*
- (a) *it is hosted in the licence area of the proposed licence; or*
- (b) *it is produced in the licence area of the proposed licence; or*
- (c) *it relates to the licence area of the proposed licence.*

Defining "local significance"

Irrespective of content, programming (being the material to which the Act refers) generated by Lofty is deemed to be of *local significance*. This includes but is not limited to automated playout programming consisting of non-syndicated programming materials curated by Lofty's Programming Subcommittee.

Establishing local significance in syndicated programming

Programming produced outside the licence area is referred to as *syndicated* programming (refer Policy 4.2.3). Syndicated programming scheduled by Lofty prior to 1 November 2019 (viz. release date of V1.0 of this policy) is classified as *legacy* programming.

For the purposes of this policy, Lofty has taken the following wording from the Explanatory Memorandum, Broadcasting Legislation Amendment (Foreign Media Ownership and Community Radio) Bill 2017 (Cth). As this memorandum was presented to every Member in each House, a reasonable person may infer that the memorandum's content was taken into consideration in passing the Bill.

Consider Item 2 of Schedule 2, page 45 of the memorandum. Lofty's interpretation of the impact on sections 84(2)(ba) and 84(3) on syndicated programming is **emphasised** as thus:

*Item 2 would insert a new subsection 84(3) to provide that, **for the purposes of paragraph 84(2)(ba), material would be of 'local significance' if it is hosted in; or produced in; or relates to, the licence area of the proposed licence.***

*The meaning of 'relates to' the licence area is not defined, in order to provide the ACMA with flexibility to adapt it over time as appropriate in the community radio context. Material could relate to the licence area if, for example, it relates to a person, community organisation or event in the licence area. **Material could also relate to the licence area if it relates to a social, economic, political or cultural issue** as it affects the licence area (either in the sense of the geographic area or a community within the licence area).*

Issues of local significance

All legacy syndicated programming has been assessed pursuant to this policy, with local significance added as an assessment criterion to Policy 4.2.3 in V1.1, viz.

Criterion	Desirable	Neutral	Undesirable
<i>Local significance</i>	Addresses two or more of these issues: <ul style="list-style-type: none">- social- economic- political- cultural	Addresses one of these issues: <ul style="list-style-type: none">- social- economic- political- cultural	Does not address any local issues.

Legacy syndicated programming with a local significance rating of *neutral* or *desirable* is to be adopted as permanent programming by Lofty (notwithstanding any future programming decisions by the Programming Subcommittee to retire said programming).

Where the local significance criterion leads to a rating of *undesirable*, said legacy syndicated programming shall be subject to further assessment to ascertain if a community need is met in terms of Policies 4.2.1[a] and [b].



POLICY DOCUMENT 4.2.3

Policy Name (full)	Radio Programming - Syndication
Policy Family	4 – Programming
Version/Date	V1.2 1 October 2020
Maintained By	Programming Subcommittee

PRECIS This policy sets parameters relating to the use of syndicated material to broadcast issues of local significance and/or community need; along with protocols relating to Lofty offering its locally produced programming to other not-for-profit/community broadcasters for rebroadcast.

SCOPE Radio broadcasting, radio streaming.

Introduction

In order to fill gaps in programming due to issues such as presenter shortages or other resourcing limitations, many community broadcasters turn to programming distributed via syndication.

A radio program is said to be syndicated when it is broadcast at two or more radio stations on a regular basis. Said program may either be live (or have been broadcast live with a recording being offered for syndication), or it could be recorded somewhere other than a radio studio.

Given community radio's role as a locally based medium designed to complement and supplement existing services within a given licence area, excessive reliance on syndicated content may be detrimental to both the audience and the broadcaster.

That said, syndicated content may be beneficial where there is demand for specific content, but said content requires significant resources to produce. The most obvious example is news and current affairs: even a simple 2-minute news bulletin at the top of each hour requires resources beyond the reach of all but the largest metropolitan community radio stations.

An argument can also be made to suggest that quality syndicated content may have greater local relevance than a simple automated music playlist; indeed, this is the whole premise behind the Community Radio Network (CRN).

Purpose

This policy is intended to ensure that Lofty:

- remains open to opportunities to better serve our local audience through strategic use of syndicated content;
- has a clear understanding that live programming and/or content produced in-house is Lofty's top programming priority, viz. *local content is always given priority and syndication is not to be used as a substitute where locally produced programming is available*;
- conducts a full assessment of proposed syndicated content before adopting it as part of Lofty's program mix, weighted towards material of *local significance* and *community need*;
- proactively seeks opportunities to replace legacy syndicated content with locally produced/presented content where opportunities arise; and
- has robust parameters against which to measure the value of running syndicated content in lieu of locally generated automatic playlist; as well as
- allowing for the exploration of Lofty's locally produced content to be syndicated to other community or not-for-profit radio stations where appropriate.

General Policy

Lofty shall assess and choose syndicated content based using the Syndication Assessment Matrix, as shown in Appendix A. The matrix is a tool for use by the Programming Subcommittee to determine a proposed syndicated program's suitability for broadcast on Lofty and includes a scoring system designed to assist – but not replace – the Programming Subcommittee's decision process.

The maximum possible score achievable on the matrix is 90 points for *specialist* music programming (as defined in Policy 4.1.1) and 100 points for news, talk and magazine-style programming. The raw score is used; this is deliberate as it places greater weight on non-music programming that is more likely to address issues of local significance.

The matrix is weighted heavily towards material of community need (maximum 20 points) and of local significance (maximum 30 points). Please refer to Policies 4.2.1 and 4.2.2 respectively for more information.

There are several case studies where syndicated programs currently on Lofty have been assessed pursuant to the matrix; said case studies are shown as Appendices B, C and D.

Where a producer/presenter based in the Mount Barker RA1 licence area indicated a preference for their show to air when syndicated content *without established local significance* is currently scheduled, said syndicated content shall be moved to a non-prime timeslot.

Lofty shall not broadcast syndicated generalist music programming, as defined in Policy 4.1.1.

In addition to the above criteria, the Programming Subcommittee may consider other factors that may enhance or detract from a syndicated program's desirability.

Syndication as a research tool

Historically, Lofty has used syndication to experiment with material the Programming Subcommittee believes will complement and supplement other broadcasters within Mount Barker RA1.

This has proven to be a useful empirical research tool for Lofty to establish community needs, as it has confirmed the community's need for many genres of music that are unavailable on other stations within the Murray Bridge LAP in general, and Mount Barker RA1 in particular.

In addition, we have discovered news/talk and magazine-style syndicated material that not only meets a community need, but is also of local significance.

Where syndicated programming establishes a community need but is not of local significance, Lofty's goal is to convert the need into material of local significance as soon as practicable. This is done by using syndicated programming as encouragement to potential new local presenters/producers that are considering starting their own program within the same genre of the syndicated program in question.

Some highly specialised music content, most notably EDM, may be very difficult to convert to material of local significance despite a community need being met; often due to the immense skills and knowledge of the DJs that produce such programming.

In order to service a need without compromising Lofty's obligation to need to maximise material of local significance during prime dayparts, syndicated programming that meets community need but not local significance shall only be aired where programming of local significance (automated playout notwithstanding) is unlikely to be sourced.

Syndicated material of local significance

Due to the immense resources required to produce certain types of material, Lofty uses syndication to meet local demands.

Examples of resource-intensive content includes news, current affairs, environmental programming (climate change and sustainability specifically, along with the environment in general), science and LGBTIQ news.

Lofty notes that many community broadcasters around Australia find such content meets local significance requirements.

Placeholders

Where a syndicated program has been scheduled as a placeholder, Lofty is to actively seek a local presenter/producer to broadcast a show featuring comparable material. Said presenter/producer may be sought via general member recruitment activities, targeted member recruitment activities (e.g. announcements calling for a specific type of presenter aired before, during and after said placeholder) or via the existing Lofty member cohort.

Once a suitable local presenter/producer has been found, the placeholder is to be retired. Appendix B shows a case study where this has occurred.

In the event that there is local audience/community demand for the retired placeholder show to be reinstated, the Programming Subcommittee *may* consider rescheduling this show during a non-prime timeslot.

The use of syndicated programming as a placeholder is to be phased out as Lofty's pool of local presenters/producers increases.

Prime vs non-prime timeslots

Put simply, a timeslot that can be readily filled by a local presenter/producer is a prime timeslot. As timeslot demands can be somewhat more fluid than a policy document, prime timeslots are indicated on the current programming guide grid. The Programming Subcommittee may amend the list of prime timeslots without notice.

Lofty programming syndicated to other stations

Lofty encourages its presenters/producers to pursue appropriate syndication opportunities. When doing so, presenters/producers are to engage either the Programming Coordinator or the Programming Subcommittee to ensure that the appropriate protocols are adhered to, as documented from time to time.

The Programming Coordinator and/or Programming Subcommittee may also introduce the presenter/producer to various tools and platforms currently in use by other presenters/producers, as well as helping to identify the most effective syndication platforms based on the program's format and content.

The presenter/producer shall be responsible for preparing recordings of their show for syndication. In its simplest form, this means the presenter/producer will need to take a copy of their show off the logger, edit out sponsorship announcements and station IDs (both live and cart based), re-encode their show (MP3 320kbps commensurate with Lofty's technical standards), and arrange their own distribution.

The presenter/producer may access Lofty resources, including equipment and internet connectivity, for the purpose of preparing and distributing their show for syndication, subject to availability.

Under no circumstances shall a producer/presenter charge a fee for syndication where Lofty's facilities were used to create, record, edit and/or broadcast said show.

APPENDIX A – Syndication Assessment Matrix

Criterion	Desirable (points)	Neutral (points)	Undesirable (points)
<i>Origin</i> (maximum 5 points)	South Australian (5) Australian (4)	Overseas (3)	Not assessed
<i>Barrier to entry</i> (maximum 10 points)	Very High (10) High (7)	Medium-High (6) Medium (5) Medium-Low (4)	Low (2) Very Low (1)
	Consider how difficult it would be for Lofty to produce its own in-house equivalent.		
<i>Overall quality</i> (maximum 5 points)	Very High (5) High (4)	Medium (3)	Low (2) Very Low (1)
	Measured in terms of quality of content i.e. research, production values, source material, as well as technical quality e.g. MP3 bitrate, distribution technology used.		
<i>Local significance</i> (7.5 points for each issue addressed; maximum 30 points) To be assessed in terms of Policy 4.2.2.	Addresses two or more of these issues: - social - economic - political - cultural	Addresses one of these issues: - social - economic - political - cultural	Does not address any issues of local significance
<i>Compatibility</i> (maximum 10 points) Scored at Programming Subcommittee discretion; ranges given to accommodate for actual scored determined via assessment.	High (10) Complements Lofty's existing programming or is an equal or superior replacement to other syndicated programming; readily demonstrable community need <u>and</u> local significance.	Medium (5) Style/content not currently part of Lofty programming; may appeal to new audience; unproven on Lofty, but may fill a community need and/or be of local significance.	Low (0) Not locally significant or Lofty already has locally significant material in the genre; content falls outside of Lofty policy and/or Constitution; un compelling content; poor overall fit.
<i>Community needs</i> (maximum 20 points) Scored at Programming Subcommittee discretion; ranges given to accommodate for actual scored determined via assessment. To be assessed in terms of Policy 4.2.1.	Current or future need clearly identified; researched and/or documented, either fully or in part. Refer Policy 4.2.1. No overlap with other services within licence area.	Current or future need clearly identified but not yet researched or documented in terms of Policy 4.2.1. Complements and supplements other services within licence area.	Current or future need not clearly identified, researched and/or documented. Significant overlap with other services within licence area.
<i>Cost</i> (maximum 10 points)	Free (10) ≥ 100% sponsored	Paid feed e.g. CRN (5) Low-moderate cost ≥ 50% sponsored	High Cost (0) ≤ 50% sponsored
<i>News & Talk</i> (maximum 10 points) Scored at Programming Subcommittee discretion. To be assessed in terms of all Programming Policies; specifically, 4.1.3 and 4.1.4. MUSIC PROGRAMMING IS NOT SUBJECT TO THIS ASSESSMENT CRITERION.	Socially progressive. Non-partisan. Large, well known reputable source. Aligns with Lofty's culture and ethos.	Socially neutral. Non-partisan. Small-medium reputable source. Indifferent to Lofty's culture and ethos or may challenge Lofty's culture and ethos in a respectful manner.	Socially regressive. Partisan. Dubious source Hostile to Lofty's culture and ethos.

APPENDIX B: Case study 1 - Living Planet

Living Planet is a weekly 30-minute program produced by Deutsche Welle (DW), Germany's national broadcaster. Scheduled as part of Lofty's Sustainability Sunday programming block; an established block of programming focused on environmental issues.

DW's programming compares favourably to other highly regarded national broadcasters including the BBC and the ABC. DW material is broadcast on many community stations across Australia.

The environment has local significance to most (if not all) communities in Australia. Climate change is arguably the most pressing environmental issue in living memory. Among other potential consequences, significant social and economic upheaval has been forecast as a by-product of climate change.

Regrettably, climate change has – in our opinion – been politicised; said politicisation being aided and abetted by mainstream media outlets. This has been to the detriment of logic and rationality insofar as considering the causes and potential solutions.

As such, providing apolitical and fact-based material discussing climate change is both of local significance and fulfils a community need. One member of the Programming Subcommittee has suggested that failure to broadcast such material would constitute “a dereliction of duty to Lofty's licence area”.

Syndication Assessment Matrix – Living Planet

Criterion	Assessment	Score	Justification
<i>Origin</i>	Overseas (Germany)	3.0	
<i>Barrier to entry</i>	Very High	10.0	DW has global resources
<i>Overall quality</i>	Very High	5.0	High production values
<i>Local significance</i>	Social, economic, political	22.5	Environmental issues are of global concern. Resultant social, economic and political upheaval is of local significance.
<i>Community needs</i>	Identified and researched	15.0	Based on listener feedback, survey results etc. Complements and supplements similar material from ABC RN and ABC News Radio.
<i>Compatibility</i>	High	10.0	Fits current programming; local significance and community needs established. High quality programming from reputable source.
<i>Cost</i>	Free	10.0	Sourced directly from DW, free of charge.
<i>News & Talk</i>	No obvious bias, highly reputable source, aligns with Lofty's culture and ethos, minimal overlap.	8.0	DW is Germany's national broadcaster and is well regarded for its quality and neutrality.
TOTAL SCORE		83.5	

Living Planet is considered a *desirable* syndicated program. At the time of writing, Living Planet airs on Lofty every Sunday morning at 9am.

APPENDIX C: Case study 2 - Cool Nights

Cool Nights was a weekly 60-minute program produced by Steve Hart, an independent program maker based in Auckland, New Zealand. Scheduled as part of Lofty's Sunday Night Jazz programming block; an established block of programming focused on Jazz music.

Steve specialises in Smooth jazz, a hybrid of Jazz fusion and soul music that developed in the mid-1970s. The sub-genre entered its decline in the early 1990s, but still has a small yet enthusiastic following. During its time on air, Cool Nights was one of Lofty's most popular shows.

Syndication Assessment Matrix – Cool Nights

Criterion	Assessment	Score	Justification
<i>Origin</i>	Overseas (NZ)	3.0	
<i>Barrier to entry</i>	Medium-Low	4.0	A particularly well curated program within a sub-genre. Barrier was considered high when Cool Nights was first introduced. Latent community need uncovered for smooth jazz. Creates opportunity to introduce locally significant smooth jazz program.
<i>Overall quality</i>	High	4.0	MP3 192kbps. Full playlists provided. Good research and artist notes.
<i>Local significance</i>	Cultural	7.5	Hosted by British ex-pat living in NZ. Local significance based on relatability to Steve by significant British and NZ migrant populations within licence area.
<i>Community needs</i>	Identified and researched	15.0	Based on listener feedback, survey results etc. Not offered by any other broadcaster in licence area.
<i>Compatibility</i>	High	10.0	Fits current programming; local significance and community needs established. High quality programming from reputable source.
<i>Cost</i>	Free	10.0	Sourced directly from Steve, free of charge.
TOTAL SCORE		53.5	

From Lofty's inception in 2017 through until September 2020, Cool Nights regularly aired on Lofty. It is a well-crafted niche program with a strong following.

Despite having a solid score (53.5 out of a possible 90), Cool Nights' desirability is considered neutral due to a relatively low barrier to entry and overseas origin.

Since October 2020, Cool Nights has been replaced by a similar Australian-made program, "The Breeze".

The community need for smooth jazz music may not have been discovered were it not for Lofty using syndication as a community needs research tool. As a result, a great opportunity has been created to attract one or more presenters to create a locally significant smooth jazz program within the licence area.



POLICY DOCUMENT 4.2.4

Policy Name (full)	Programming – Community service announcements
Policy Family	Document Series 4 - Programming
Version/Date	V1.0 22 February 2019
Maintained By	Programming Sub-committee, in conjunction with the Marketing & Community Engagement (MACE) Sub-Committee

PRECIS	This policy sets mutual expectations between Lofty and those seeking to promote not-for-profit community events, groups, enterprises or other such organisations.
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Introduction

As a community broadcaster, it behoves Lofty to avail itself to community groups undertaking public awareness campaigns. This may be in the context of promoting a specific event, or it may be to increase awareness of a group's ongoing community

Scope

This policy covers our on-air radio broadcasting, as well as our community events guide at lofty.org.au along with any cross-promotion of said community group or event on social media.

Exclusions

Whilst Lofty is happy to entertain groups that wish to promote their organisation or event, we have a few exclusions. Where a group or event is subject to an exclusion, our rationale is clearly given. Broadly speaking, exclusions are in place either to preserve the integrity of Lofty's Constitution or because Lofty believes that said community event is being held as part of a profit-making exercise. In the case of the latter, Lofty may offer said promoter a paid sponsorship opportunity in order to promote said event.

Excluded groups/events include, but are not limited to:

- Religious-related events, including but not limited to church services, religious based music concerts, religious school open days etc. (see note 1)
- Political-related events, including but not limited to election campaign information evenings, candidate fundraisers, protest rallies etc. (see note 1)
- Spirituality-related events, pseudoscience and other associated woo. (see note 1)
- Any events where Lofty has reason to believe that said event may incite violence and/or hatred, or may vilify any person of group.
- Events held at business premises or private properties *unless* there is either a live performance (including but not limited to music, theatre, comedy and/or dance) where said performance may attract an admission fee; or a static public display (including but not limited to art exhibitions, historical display etc) where admission to said display is free of charge and without any obligation to purchase from said premises.
- Any courses or classes that are facilitated by private enterprise (including but not limited to a sole trader, partnership, company or trust) *unless* said courses or classes are funded by a Local, State or Commonwealth Government agency or not-for-profit. (see note 2)

- Any event or activity that is deemed by Lofty to be part of a private profit-making enterprise (see note 2).

Notes

1. Rule 6 of the Constitution establishes Lofty as a secular and apolitical organisation. Promoting events or groups whose objective is to further a specific political or religious cause (with “religious cause” including but not limited to spirituality-related events, pseudoscience and associated woo). Groups and events promoting atheism are also prohibited from promotion on Lofty under this policy.
2. This is not a bona fide community event i.e. the organisers of the event have a clear profit motive that is not tied to an incorporated association or registered charity. Lofty is a not-for-profit organisation. As part of our community engagement strategy, we encourage *bona fide* community event organisers to promote their event with Lofty, free of charge. We are happy to promote businesses and events staged as part of a profit-making endeavour, however said promotions are to be made in the form of *paid sponsorship*. Said sponsorship is subject to Lofty Policy, CBAA code etc.

Where it is unclear whether or not an event falls outside of Lofty policy (e.g. a secular event held at a religious school campus), Lofty *may – at its discretion* – contact the organiser for further information in order to make a decision as to whether or not promotion of said event would be in breach of Lofty policy.

Where an event is removed or refused due to promotion of a profit-making exercise, Lofty may – at its discretion – approach the organiser of said event and invite them to take up a paid sponsorship campaign with Lofty.