

Policy Last updated Sponsorship 6 June 2022 Sunshine FM is a community broadcaster that relies on membership fees, donations and sponsorships to remain on-air and maintain high standards of community service broadcasting. Sponsorship revenue is not our primary focus but it is our primary source of funding.

The policy and guidelines described in this document will ensure that Sunshine FM remains compliant with the regulatory obligations and responsibilities attached to its community broadcasting licence. For clarity, reference should be made to the Australian Communications and Media Authority (the ACMA) Community Broadcasting Sponsorship Guidelines 2008 publication and the Broadcasting Services Act 1992 (the Act).

Sunshine FM's sponsorship policy complies with Code 6 'Sponsorship' described in the CBAA Codes of Practice.

# **KEY POINTS**

- 1. Sunshine FM will not broadcast advertisements;
- 2. Sunshine FM will broadcast sponsorship announcements that are appropriately tagged to identify content that has been funded by a station sponsor;
- 3. Sunshine FM will not exceed hourly sponsorship limits, currently set at five (5) minutes per hour;
- 4. Material broadcast that is of an advertising character is not taken to be the broadcast of an advertisement, if it is an accidental or incidental accompaniment to a broadcast and no payment or valuable consideration has been received by Sunshine FM in relation to it;
- 5. All volunteers, staff and contractors who have a role in the scheduling and broadcasting of sponsorship announcements will have a clear understanding of their responsibility to ensure compliance with Sunshine FM sponsorship policy;
- 6. Management will promptly investigate any breaches of sponsorship policy and implement remedial action, and be alert to vexatious complaints or claims about sponsorship issues.

## DEFINITION OF A SPONSOR

A sponsor is an individual, organisation or business that provides cash or in-kind payments to the Sunshine FM Radio Association Inc. to fund the operation of the station. Such payments are in exchange for on-air acknowledgement of that support. Usually, sponsorship announcements will occur on a frequent, pre-arranged schedule.

## SPONSORSHIP ANNOUNCEMENTS

• A sponsorship announcement may promote things like the activities, events, products or services of a sponsor, provided it contains an acknowledgement of financial or in-kind support by the sponsor of Sunshine FM or a particular programme broadcast on Sunshine FM;

- Material not considered sponsorships includes, but is not limited to, station promotions, community information or community promotions (CSAs), general information about events and musical performances (that do not include prices or entry fees), and interviews with subject matter experts;
- The station manager will make decisions relating to sponsorship matters on behalf of the management committee;
- Sunshine FM is responsible for all sponsorship material broadcast, including material sourced externally, as well as content produced by the station;
- The way we sell air-time on Sunshine FM must comply with licence obligations at all times;
- No restrictions apply to the placement of sponsorship announcements in programmes. However, where a particular program or segment are sponsored, the association between the sponsorship and the content needs to be clear to our listeners.
- A sponsorship announcement must be genuine. Sunshine FM must be able to demonstrate that the sponsor featured in an announcement is actually a financial supporter, in cash or in-kind;
- The duration of a sponsorship announcement must take into account the whole announcement, exactly as it is broadcast. This including the sponsorship tag and any accompanying music.
- Typically, sponsorship announcements are 15 or 30 seconds in duration but the station can sell sponsorships of varying durations, up to a maximum of 5 minutes, each;
- There is no limit on the number of sponsorship announcements that may be broadcast in each hour, as long as their combined duration does not exceed the permitted number of minutes in any hour which currently is 5 minutes;
- To facilitate compliance with that limit, the count will begin at the start of each hour;
- Sales personnel will strive to accommodate reasonable expectations of station clients and will do so in accordance with the station's licence obligations;
- The station manager has final responsibility for decisions about appropriate duration and placement of sponsorship announcements within each hour;
- If a volunteer, staff member or contractor has any questions or is unsure of the most appropriate way to manage the scheduling and broadcasting of sponsorship announcements, they should consult the station manager in a timely manner.

# SPONSORSHIP TAGS

- 'Tag' is a term commonly applied to an on-air label included in content that enables Sunshine FM to properly acknowledge cash and in-kind support provided to the station by a person, organisation or business;
- Each sponsorship announcement requires a tag that appears at least once in the announcement;
- The content of a tag must include the word 'sponsor' or an appropriate derivative of 'sponsor', as well as the name of the person, organisation or business that has

provided cash or in-kind support to the station or program. It is permissible for this information to appear, anywhere within the overall content of a sponsorship announcement, provided it would be obvious to an ordinary, reasonable listener that the content was sponsored;

• A tag must be clearly heard and understood and in the same language as the sponsorship announcement.

### COMPLAINTS

In the first instance, complaints made to the station regarding sponsorship issues will be dealt with by the station manager or management committee in accordance with the station's complaints policy and guidelines. Complaints lodged with the ACMA are considered by the ACMA on a case-by-case basis.

#### **VEXATIOUS CLAIMS**

Courts have considered an ordinary, reasonable listener to be:

"A person of fair average intelligence, who is neither perverse, nor morbid or suspicious of mind, nor avid for scandal. An ordinary, reasonable listener does not live in an ivory tower, but can and does read between the lines in the light of that person's general knowledge and experience of worldly affairs."

#### SALE OF BLOCK AIRTIME

Sunshine FM does not engage in `sale of block airtime' which is the sale of a significant, single block of airtime such as 30 minutes or an hour.

#### SYNDICATED PROGRAMS

Sunshine FM remains responsible for the content and duration of sponsorship announcements in syndicated or retransmitted programmes. The station's sponsorship policy applies to everything broadcast on Sunshine FM.

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