



# Operations and Procedures Manual

PART 2 – OUR POLICIES

Near Media Co-Op complies with the Charities Governance Code. Our registered charity number is; RCN: 20205453

**The policies, operations and procedures outlined within this handbook apply to all Near media Co – op shareholding volunteer members and staff**

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## **OUR POLICIES**

Co-op policy is set by the democratically elected Committee of Management of the Near Media Co-operative and is based on the best and most relevant information available to the committee.

Structures are in place for consultation with all persons involved through regular meetings, sub-committees, an internal newsletter and community consultations.

Near Media Co-op is a registered Charity and complies with the Charities Governance Code. <https://www.charitiesregulator.ie/en/information-for-charities/charities-governance-code>

We believe that it is an important part of providing a safe and enjoyable environment for our staff and shareholding volunteer members. The following policies express our commitment to good governance.

### **Access**

Near Media Co-op aims to provide the widest possible access for persons and organisations in our area.

### **Censorship**

Near Media Co-op subscribes to the principle of each person's 'Right to Communicate'. Rights, however, bring responsibilities. If you are provided with uncensored time, (TV, radio, internet, social media etc) you are expected to behave responsibly. Don't defame under any circumstance. Don't set out to shock or offend, unless the context of the piece requires it. If your content is censored and you're not happy about it, make a written report to the Programme/Content Committee. If you not satisfied with the outcome, you can appeal the decision to The Secretary, Committee of Management.

## PROGRAMMING AND CONTENTS POLICY

Provide access to training, production and distribution facilities;  
encourage local creative talent and foster local traditions, and provide programmes for the benefit, entertainment, education and development of their audience;  
Community Radio Charter for Europe, point 2

In keeping with the stated objectives of our Community Media Co-op, content will incorporate a positive emphasis on:

- \* Facilitating and supporting community development
- \* Contributing to the media diversity in our area.
- \* Encouraging education and life-long learning.
- \* Providing information on employment and other issues which will assist people in meeting their information needs
- \* Providing access for a wide range of groups within the community, in particular minorities and those under-represented in public service and commercial media
- \* Providing a platform for local arts, musical, literary, sports, and other cultural activities
- \* Providing a platform for Irish culture, including the Irish language and Irish music
- \* Promoting civic pride

All of our proposed content will be measured against the Co-op's objectives and the policy statement, and against any guidelines laid down from time to time by the Programming and Contents Committee.

Furthermore, the Broadcasting Authority of Ireland (BAI) has stated that Near FM has editorial and operational independence in terms of scheduling, programme content, and staff / shareholding volunteer member utilisation. In doing so it must comply with necessary legislation and adhere to its own guidelines.

## THE PROGRAMMING AND CONTENTS COMMITTEE

We promote the right to communicate, assist the free flow of information and opinions, encourage creative expression and contribute to the democratic process and a pluralist society.

Community Radio Charter for Europe, Point 1.

The Programming and Contents Committee is appointed by the Committee of Management. The current Committee are; Alan Braddish and Dorothee Meyer-Holtkamp, Debbie Hutchinson, Sarah Jane Fortune, Dave Rigney. The Committee's job is to plan the schedule, allocate time to new contents, revise the Schedule and individual programmes on a continuous basis, and deal with problems including legal, regulatory and near ethos to broadcasting as they arise.

In keeping with the policy, contents will change from time to time. No one will OWN a particular time slot or programme, so if you are asked to move the time of the programme, or if the programme/area you are working on is dropped, please accept it in the spirit of the Co-op. Naturally, the Committee will consult with you before taking any such decision.

At times Near organises special programmes from outside the studios, so called Outside Broadcasts, OB's. We generally give 8 days notice prior to cancelling a programme.

When dealing with TV issues the Programming and Contents committee will include the TV coordinator, and when dealing with online issues the Social Media appointee will be included.

## PROGRAMME REVIEW SUB-COMMITTEE

This is currently made up of Dara Duffy, Connie O'Reilly and Andrew Flannery and is supported by staff member Alan Braddish.

### Terms of Reference

#### What is it?

A review panel is a group of experienced broadcasters/Committee of Management shareholding volunteer members who will review programming on a regular basis.

#### Why do it?

- It is an important part of our ethos and strategic plan to give regular feedback to programme producers to try to encourage stronger community programming.

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- Many programme makers regularly ask for feedback.
- It gives Committee shareholding volunteer members a regular understanding of the issues with programming.

#### How does it work?

- The group is made up of Committee shareholding volunteer members, key staff and other experienced shareholding volunteer members. A programme is selected by the Programme/contents committee\* or a shareholding volunteer member requests feedback.
- A technician will mail the below form and a link to three random podcasts to the panel.
- Each panel shareholding volunteer member listens to the programmes and give the feedback.
- A panel shareholding volunteer member working with a key member of staff, collates the feedback and sends to the programme producers. (copies to panellists and programme/contents committee)
- Programmes are reviewed under the headings below.
- Training can be recommended to the programme-maker

\*Programme/contents committee primarily looks after new programme proposals, scheduling issues and problems with programmes, not turning up etc.

### ***Panel Review form***

The comments are intended to be constructive and help improve your programme are not to be taken as a personal criticism.

**Content:** We are looking to see if the content matches the programme guidelines or programme proposal.

**Community relevance:** This can be understood in quite broad terms, especially with a music programme, where the community may mean the listeners with an interest in this type of music e.g. is there information about upcoming gigs.

**Production:** We are trying to see if the programme is well researched and planned, and is there any promotion.

**Technical presentation:** Was there dead-air, or poor sounds or phone levels. Did it sound like the person was wearing headphones etc?

**Right of reply:** All reviewed programmes have a right of reply, where they can write to the secretary, if they feel unjustly treated.

## ***Sample feedback letter***

Dear XXXX,

We are writing to you to give you feedback on your programme, “XXXXX, to which we have been listening over the past while. Our comments are made up of those of on the programming review sub-committee and experienced broadcasters.

The comments below are intended to be constructive and help improve your programme are not to be taken as a personal criticism. If however you feel unjustly treated you may reply in writing to the programming committee through the station manager.

**Content:**

**Community relevance/participation/diversity:**

**Production:**

**Technical presentation:**

Overall it is an excellent/v. good/good programme.  
We recommend that you take some refresher training on ...

If there any areas in which you would like to comment please contact us.

Thank you for your reliability and commitment.

Yours sincerely,

The programming review sub-committee



## TYPES OF CONTENT

Content will include:

1. Those made by shareholding volunteer members within the project itself, such as local current affairs, arts, sport, specialist music and
2. Those made by groups within the Community.

Many shareholding volunteer members will be involved for the most part in type 1, but there is a very important role to be played in providing help and support to groups taking part.

### Content

There is ALWAYS a local angle!

All content, whether music or speech-based, should focus on local issues and local talent. In planning your programme please try to bear this in mind, as it is easy to lose sight of our objectives when you are caught up in the mechanics of actually producing content. This does not mean that national or even international issues cannot be dealt with; it just means that in dealing with them you should try to take a local or community angle.

### Style

We do NOT want to sound like a pale imitation of commercial media.

Near Media Co-op does not aim to have a particular "style" of broadcasting but we aim to AVOID particular styles. Commercial media has a particular "sound" and "look" which is instantly recognisable. If you tune into a radio station you will know if it is a commercial one almost instantly, whether you hear a "DJ", an advertisement, or even, sometimes, a piece of music. In fact, you could travel around Ireland listening to commercial radio and in many cases you would think you had never left Dublin. Near FM should sound as though it comes from North-East Dublin. In other words, people involved in the Co-op, and on the station should sound like themselves, speaking in their own accents, in their own language.

The question of style goes deeper than accents: it also covers such issues as our attitude to our audience. Serious issues are often treated sensationally and personal stories can be used in a way that exploits the person telling them. It is useful when making content to ask yourself if you are treating your audience, and indeed your guests (if any) with the respect and dignity due to all human beings.

### Sponsorship

You may feel that your area could benefit from a link with a sponsor. ANY such links need to be discussed IN ADVANCE with the Project Co-ordinator. This is very

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important as our approach to Sponsorship is very specific and is part of our radio licence conditions.

## Complaints

From time-to-time complaints about particular items can arise. If you receive a complaint about your content, please let the Programming and Contents Committee know. If the Committee receives a complaint about your content they will talk to you about it before taking any action. They may write to you directly setting out the basis of the complaint and may take a decision to cease your broadcasting of similar or all material. You will be advised of your right of appeal to the Committee of Management, should this happen.

## BALANCE IN CURRENT AFFAIRS PROGRAMMING

This is our Mission Statement

- ✓ To foster social justice, media literacy and promote civil society ownership of media.
  - ✓ To be a democratic, independent, not-for-profit community building resource.
  - ✓ To provide an alternative to mainstream media by offering an outlet for those underrepresented or excluded through training and access to distribution facilities.
  - ✓ Through distinctive programming to contribute to the education, entertainment and development of our community.
  - ✓ To defend the environment and human rights, particularly the right to communicate.
1. Presenters and producers should be very familiar with the **mission statement**, as set out above. These demonstrate our commitment to empowerment, minority voices and our duty to support these voices. This does not mean that there cannot be another side to the story. Having a counter argument can make the telling of an issue more interesting and engaging for the listener. It is part of our role to offer some level of opposing viewpoint and where necessary to play devil's advocate.

### 2. Counter-argument

This is something we should strive for. We have to use our experience and expertise as community media people to decide where, when and to what extent. e.g. We may not be looking for counter-arguments during an anti-racism

week. But this is not to say that xenophobia couldn't better challenged by allowing people to have a voice a put forward their point of view.

### 3. Time frame

We cannot always bring balance to a discussion within the one interview. There are simple constraints such as resources and availability. Therefore the timeframe in which we bring about the counter argument can be over a given period, two months being the maximum time.

### Additional guidelines:

Here are some of the key issues when dealing with current affairs interviews.

- The presenter needs to put questions to the interviewee that represent the other side of the argument. The presenter **cannot** be seen to be endorsing or supporting an interviewee's side of the argument.
- A person representing the other side of the argument can be interviewed on a future programme, therefore balance can be achieved over a number of programmes. **But** the timing between the interviews is important and they cannot be too far apart. (There is no strict duration, but depending on the issue, a month is about the limit)
- It is not enough that there is **balance** over a broad theme (e.g. the Israel /Palestine conflict) More so, we have to try to achieve balance with a topic under that theme (e.g., the flag protests in Belfast is a topic and the troubles in the North of Ireland is a broad theme)
- A connection must be stated between the interviews. We need to be explicit in stating what we are doing. So "this interview gives another side of the story to the one we played about the 'given topic' two weeks back.

If you have any questions please come back to Ciaran, Sally or Alan.

## CURRENT AFFAIRS SUB-COMMITTEE

### Terms of Reference

#### What is it?

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A group of experienced broadcasters/Committee of Management shareholding volunteer members/staff who will oversee current affairs review programming on a regular basis. The committee mainly concerns itself with politics, referendums and looks to keep programmes in line with Broadcasting Authority of Ireland (BAI) codes and guidelines while maintaining the ethos of the coop. Other legal matters such as libel are also covered.

#### Why do it?

- To ensure that a wide variety of good quality current affairs output
- To ensure that we are keeping to our ethos in current affairs programming
- To ensure that as part of our licence broadcasting codes are followed correctly.
- To give presenter the tools and confidence to handle tricky issues

#### How does it work?

- The committee deals with programming that cover current affairs items, i.e. magazine programmes, social justice programmes etc.
- Workshops and training are provided on various elements of current affairs.
- Shareholding volunteer members of the sub-committee will meet and support presenters on a one-to-one basis from time to time to talk through tricky issues.
- The committee listens to programmes and give feedback and direction to the presenters and producers.
- Further training can be recommended to the programme-maker
- If presenters do not follow the instructions of the sub-committee, the matter will be passed on to the Coordinating Committee, and this may lead to the programme or the presenter being suspended. See operational manual.

**Right of reply:** All programmes and presenters have a right of reply, where they can write to the secretary, if they feel unjustly treated.

### **Competitions**

As an alternative service to both commercial and national public service media, we are experimenting with alternative ways of doing things. One you should be aware of is our 'non-competitive' policy. This means that no competitions are allowed. Instead, if you have a gift to give away, you should ask your audience to submit their names for a draw for the item. No competitive questions are to be asked. Similarly, we will attempt to find non-competitive ways to promote the Co-op, to encourage more involvement of the local citizens.

## **Celebrity Free Zone**

As a Co-op, we try to offer an alternative to that presented by other media. For instance, we don't promote the 'cult of the celebrity'. This is a decision taken by us, and not one imposed by any state body. It's not a condition of our radio licence, for example. But, we do want to acknowledge and celebrate creative talent across our community. However, we don't see ourselves as a publicity machine for celebrities, personalities or 'Very Important People'. In our community project the celebrities are the local citizens.

Near Media Co-op tries to create positive community celebrities, positive in the sense that we want to honour people who demonstrate with particular clarity, virtues that need to be, in our view, more prominent, admired, supported and emulated in our society. The only star on our logo and in our community, is the community activist, whether paid or voluntary.

## **GUIDELINES AND POLICY FOR PROMOTING YOUR PROGRAMME**

### **Display Material**

Posters also add to the attraction of your work. If you have a special feature or are inviting a guest in to talk on a topical subject, draw up details of a poster announcing this. The office will help you to produce and distribute these. Most shop owners, libraries, community halls etc. will display your poster – but ask before you display.

### **Recorded Promotional Material on radio**

We encourage and ask all shareholding volunteer members to record a promo prior to starting your programme. The policy is to keep all promos to about 25-30 seconds. Please contact Alan Braddish, [alan@near.ie](mailto:alan@near.ie) for assistance.

### **Getting into the Community/Outside Broadcasts**

Another way to promote each platform is to go and visit public places. Becoming involved in the active life of our community can help us to promote our work. We have an Outside Broadcast Unit that can travel anywhere in your community. Our outreach platform can provide help with this. Contact [dorothee@near.ie](mailto:dorothee@near.ie) for more details.

### **For Radio, Taking A Break**

Programme schedules are generally set on a quarterly basis. If you decide to take a break from your programme, give the Contents Committee at least six (6) weeks notice. This will ensure that a replacement programme/presenter can be arranged. Our programme schedule is updated regularly on our website <https://nearfm.ie/schedule/>

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## **Studio Booking and Equipment Sign-Out**

We ask that all shareholding volunteer members book studio time in advance. Contact reception for further information, and available studio time. If you are taking out portable recording equipment, we ask that you sign it out. This is for insurance purposes. We ask for your Co-Operation in this.

Some things to note, keep in mind:

- Check if there is somebody assigned to do **studio duty** on the day you are recording/presenting your programme/segment if you need assistance.
- After you have agreed to do a programme you need to sign the **programme agreement**. Usually slots are given for 13 weeks initially. You can apply for a 30min or 60min or 90min programme.
- Prepare a **promo** in order to let other people know about your new programme. Alan can assist with the promo: [alan@near.ie](mailto:alan@near.ie).
- Promote your new programme in the newsletter which is sent out bi-monthly.
- If you'd like some assistance with designing a flyer or poster for your programme, get in touch with Dorothee, [dorothee@near.ie](mailto:dorothee@near.ie)
- Keep a **running order** of each programme and send it to the reception, the receptionist will archive it: [reception@near.ie](mailto:reception@near.ie).
- You can **book portable recorders for compiling recordings** through Alan or Gay [Alan@near.ie](mailto:Alan@near.ie), [gay@near.ie](mailto:gay@near.ie) 01.8671190.

## ***Project Leaders***

From time to time, the Co-op applies for funding for specific projects. These are once off, and of limited duration. Ideally, each project should have a team. Why don't you get together with some other shareholding volunteer members and offer to be a 'Project Team'. You will get production and administrative experience and the satisfaction of seeing a short-term project through to completion. You would not be asked to do more than one each year.

## ***Equal Opportunities***

Near Media Co-op is committed to equality of opportunity in all its employment practices, policies and procedures and to the creation of a working environment free from discrimination. Near Media Co-op's employment policy fully conforms to the Employment Equality Acts, 1998 - 2015 and accordingly, the Co-op will ensure that no job applicant or employee will receive less favourable treatment due to any of the nine grounds contained in the Act (i.e. age, gender, marital status, family status, religious, race, sexual orientation, shareholding volunteer membership of the Near Media Co-Op Operations and Procedures Handbook Part 2 Policies – Last reviewed February 2023

traveller community, disability), pay and conditions of work, training and work experiences and opportunities for career development and promotion. Selection, promotion and treatment of all employees will be on the basis of their abilities and merits only and according to the requirements of the job. This policy also extends to shareholding volunteer members. The responsibility for ensuring the provision of Equality of Opportunity rests primarily with near media Co-Op. Managers and Supervisors have particular responsibility to engender respect for difference and to accommodate Diversity where appropriate. All staff and shareholding volunteer members have an important role to play in ensuring Equality of Opportunity throughout the organisation. It is also recognised that individual employees and shareholding volunteer members on behalf of Near Media Co-op have responsibilities in law and are: a) Required to co-operate with any measures introduced by Near Media Co-op to promote Equal Opportunities. b) Must not themselves, either directly or indirectly, discriminate against fellow employees or harass or intimidate them in any way.

(See also, our Diversity and Equality Policy)

## Sound and Vision Productions - Guidelines for Shareholding volunteer members

### Background

Sound and Vision is a fund that comes from the TV licence fee. It is something that Near Media Co-op and community media lobbied for many years and it is set up to “develop community broadcasting” in the Broadcasting Act. Near Media Co-op sees this funding as a way to make high quality programming and as a support for maintaining and developing our Co-op.

Sound and Vision makes funding available to make certain types of radio and television programmes; history, heritage, arts, drama, Irish experience in international and European context; Irish language, environment, documentaries, drama, children and youth programming.

### Policy

Most projects are Near Media Co-op productions. (Near FM and Near TV) Proposals can be made to Paul Loughran (paul@near.ie) or Ciaran Murray (ciaran@near.ie) As part of a production team Near Media Co-op shareholding volunteer members will be paid for their role on the project, this could be producing/researching/editing/interviewing/writing/performing etc. Shareholding volunteer members need to show that they have an interest in the area and that they have experience in making the kind of programme in question and that they have a strong track record in delivering.

If there is no track record shareholding volunteer members may be asked to work with a programme area for a period of time before the proposal can be taken up.

Note: Near Media Co-op are usually the legal owners of all material, but we realise that there are circumstances where flexibility is need, whereby the Co-op may retain as little as 10% ownership.

Other ways to work with Near FM: On occasion we will work with producers as the broadcaster only.

But this is usually where the producer has a proven track record with Near.

### Environment Policy

Near Media Co-op realises the importance of addressing global and regional environmental problems, including the degradation of natural resources. It is essential to deal with problems that are seriously threatening the ecological balance of the planet as a whole, such as ozone layer depletion, global warming, biodiversity loss and deforestation.

There is now international consensus that degradation of natural resources, poverty and unsustainable patterns of production and consumption are not separate issues but are in fact closely interconnected and can be contributory factors to conflict within and between nations. In addition, collective action in these areas is necessary not only because many environmental problems require concerted action to achieve



a satisfactory resolution, but also to avoid market and competitive distortion that might result from unilateral actions.

Near Media Co-op follows the guidelines established by the Earth Summit in Rio de Janeiro in June 1992 recognised the need to deal with the complex inter-relationship of these issues in a comprehensive and balanced manner, adopting Agenda 21 as a guide for this organisation in their pursuit of sustainable development, and specifically, referring to Chapter 36 of Agenda 21, dealing with reorienting education towards sustainable development, increasing public awareness and promoting training.

Near Media Co-op commits itself to increase public sensitivity to environment and development problems and involvement in their solutions and foster a sense of personal environmental responsibility and greater motivation and commitment towards sustainable development

## **NEAR MEDIA CO-OP GRIEVANCE PROCEDURE FOR SHAREHOLDING VOLUNTEER MEMBERS**

### **1. Introduction**

Near Media Co-op aims to create an environment where shareholding volunteer members feel valued while **carrying out tasks ( e.g making a programme)** the Co-Operative. Near also recognises that there may be occasions when shareholding volunteer members have concerns or grievances and this grievance procedure enables individual shareholding volunteer members to raise grievances more formally. The procedure provides an open and fair way for shareholding volunteer members to make known their problems and aims to enable grievances to be resolved quickly before they fester and become major problems.

### **2. Informal Discussions**

In the first instance, if any shareholding volunteer member has a grievance about **their tasks, performance** or a colleague they should discuss it informally, as soon as possible, with their relevant platform co-ordinator (i.e Near FM, Near TV, , outreach, training and production) or another co-ordinator if the grievance involves the platform co-ordinator. The co-ordinator will take the grievance seriously and ensure that everything is done to try and resolve the issue informally. It is hoped that the majority of concerns will be resolved at this stage.

## ***Formal Procedure***

### **3. Stage 1**

If a shareholding volunteer member feels that the matter has not been resolved through informal discussions, they should put the complaint in writing to their relevant platform co-ordinator. If the complaint involves the shareholding volunteer member's platform co-ordinator the complaint should be put in writing to another co-ordinator in the organisation or the Project Co-Ordinator, Ciaran Murray.

A meeting will be held between the shareholding volunteer member and their platform co-ordinator (or other appropriate person) to respond to the complaints raised. The meeting will be an opportunity for the shareholding volunteer member to explain their complaints and share how they would like them to be addressed.

Following the meeting, the platform co-ordinator (or other appropriate person) will give a written response within 10 working days of the meeting outlining how the complaint(s) will be responded to. If the complaint is against another member of staff or shareholding volunteer member or requires further investigation, the platform co-ordinator (or other appropriate person) will need to carry out further meetings or investigations. In this case, the 10 working days limit above, may need to be extended. The response will issue following this meeting and include a reference to the right of appeal.

### **4. Stage 2**

If the shareholding volunteer member feels the issue has still not been resolved satisfactorily, the shareholding volunteer member must raise the matter, in writing, with the Co-Op Secretary. The Secretary will advise the Chair of the Committee of Management. The Secretary will invite the shareholding volunteer member to a meeting where they can discuss the matter and establish how best to resolve the situation.

Following the meeting, the Secretary will give a written response within 10 working days of the meeting outlining how the complaint will be responded to. If the complaint is against another member of staff or shareholding volunteer member, or requires further investigation, the Secretary will need to carry out further meetings or investigations. In this case, the 10 working days limit above, may need to be extended. The response will follow this meeting and include a reference to the right of appeal.

## 5. Right of Appeal

If the shareholding volunteer member wishes to appeal against any grievance decision, they must appeal, in writing within 10 working days of the decision being communicated to them to the Chair of the Committee of Management. The Chair will convene an Appeals Sub committee to hear the appeal and the shareholding volunteer member will be invited to a meeting with the Appeals Sub committee.

The Chair will not form part of the Appeals subcommittee. The Appeals sub committee's decision will be final.

A grievance made against other near media co op processes which have an appeal mechanism, are handled through that appeals process. Only one grievance will be processed at any one time.

*Please note – Near Media Co-op has a separate Harassment and Bullying Policy which should be used if the complaint relates to Harassment or Bullying.*

## **BULLYING & HARASSMENT POLICY AND PROCEDURE**

Near Media Co-Op is committed to providing all of its shareholding volunteer members, participants and guests with an environment free from bullying/harassment and sexual harassment. The aim of this policy is to outline what constitutes bullying and harassment and what action Near Media Co-Op will take in dealing with an offence of this nature.

### **Scope:**

This policy is applicable to all shareholding volunteer members, participants and guests both in the Near Media Co-Op offices and studios and at associated events such as meetings, conferences, and Near Media Co-Op functions whether on or off site. It also applies to contractors, customers and other business contacts with which shareholding volunteer members might reasonably expect to come into contact within the course of their duties and tasks in Near FM.

### **Policy:**

Near Media Co-Op acknowledges the right of all shareholding volunteer members, participants and guests to be treated with fairness, dignity and respect and to a working environment free from bullying and harassment. Every shareholding volunteer member has an obligation to be aware of the effects their behaviour has on others.

Any instances of bullying/harassment will be dealt with in an effective and efficient manner. Cases where the behaviour is proved to be repeated and consistent causing unnecessary stress and anxiety will be considered as gross misconduct and will be subject to disciplinary procedures up to and including dismissal as a shareholding volunteer member, participant or guest. It is imperative that all shareholding volunteer members, participants and guests respect the dignity of every colleague and be conscious of behaviour which may cause offence.

### **Definition:**

Bullying/Harassment are defined as any form of repeated, unwelcome and unacceptable conduct that can be regarded as offensive, humiliating or intimidation. An individual can be harassed on grounds of race, religious belief, national ethnic origin, gender, sexual orientation, age, marital status, disability or membership of the traveller community. The Harassment can include conduct offensive to a reasonable person e.g. oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti or other material which state or imply prejudicial attitudes which are offensive to fellow shareholding volunteer members. Other examples of bullying behaviour include:

- Personal insults and name calling.

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- Persistent unjustified criticism and sarcasm.
- Public or private humiliation
- Shouting at shareholding volunteer members in public and/or private sneering.
- Instantaneous rage, often over trivial issues.
- Unfair delegation of duties and responsibilities.
- Setting impossible deadlines.
- Unnecessary work interference.
- Making it difficult for shareholding volunteer members to have access to necessary information.
- Aggression
- Not giving credit for work contribution
- Continuously refusing reasonable requests without good reason.
- Intimidation and threats in general.

Sexual Harassment can be defined as conduct towards another person that is sexual in nature or has a sexual dimension and is unwelcome to the recipient.

Examples of this type of Harassment include:

- Sexual Gestures
- Displaying sexually suggestive objects, pictures, calendars or sending suggestive pornographic correspondence (including e-mail)
- Unwelcome sexual comments or jokes
- Unwelcome physical contact such as pinching, unnecessary touching, etc.

The above examples are not exhaustive and only serve as a guideline to shareholding volunteer members.

Each case will be taken in isolation and dealt with in the appropriate manner.

## ***COMPLAINTS PROCEDURE***

This policy adopts a two-tiered approach (the informal and formal procedures) to dealing with issues of Bullying and Harassment in Near Media Co-op.

### **Informal Procedure:**

It is often preferable for all concerned that complaints of bullying/harassment are dealt with informally whenever possible. This approach is likely to produce solutions, which are speedy, effective and minimise embarrassment and the risk of breaching confidentiality.

Thus, in the first instance a person who believes he/she is the subject of harassment/ bullying should ask the person responsible to stop the offensive behaviour. The person responsible should also be informed of Near Media Co-Op's bullying/ harassment policy and advised that a further occurrence of this nature will result in a formal complaint. In instance where a person is unsure whether the behaviour constitutes a form of bullying/harassment, he/she should discuss this with a supervisor or manager.

It is recognised that it may not always be practical to use the informal procedure particularly where the bullying/harassment is of a serious nature or where the

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person(s) concerned are at different levels in Near Media Co-Op. In such instances, the shareholding volunteer member, participant or guest should use the formal procedure.

### **Formal Procedure:**

Where a formal complaint is being made, the shareholding volunteer member, participant or guest should contact his/her supervisor/ manager as soon as possible. A participant or guest should contact the Project Co-ordinator. Any person making a complaint will be required to put his/her allegation in writing. In the interests of natural justice, the alleged harasser will be made aware of the nature of the complaint, his or her right to representation and will be given every opportunity to rebut the allegations made.

While it is desirable to maintain utmost confidentiality, once an investigation begins it may be necessary to interview other shareholding volunteer members, participants, guests or staff. If so, the importance of confidentiality will be stressed to them and any statements taken will be circulated to both the complainant and the alleged harasser for their comments before any conclusion is reached in the investigation. When the investigation has been completed both parties will be informed as to whether or not the complaint has been upheld. All complaints will be treated seriously, confidentially and dealt with as soon as is practicable. Strict confidentiality and proper discretion will be maintained as far as is possible to safeguard both parties from innuendo and harmful gossip. A record of all relevant discussions which take place during the course of the investigation will be retained on file.

### ***ACTION POST-INVESTIGATION***

Where a complaint is upheld, a disciplinary hearing will take place in line with Near Media Co-Op's Grievance Policy. Should a case of bullying/harassment be proven then the Near Media Co-Op will take appropriate disciplinary action up to and including dismissal. Records of any warnings for bullying/harassment will remain on file with the Co-op and will be used if any further allegations of a similar nature occur in the future.

Regular checks will be made by the person responsible for investigating the complaint to ensure that the bullying/harassment have stopped and that there is no victimisation. Retaliation of any kind against a shareholding volunteer member for complaining or taking part in an investigation concerning bullying/harassment is a serious disciplinary offence. In cases where it is established that a person made a false allegation against a shareholding volunteer member, then he/she will face serious misconduct charges resulting in an immediate disciplinary hearing.

## **NEAR MEDIA CO-OP SHAREHOLDING VOLUNTEER MEMBER GOVERNANCE ACCORD**

To deal with disputes and unacceptable behaviour by any Shareholding volunteer member involved in this Community Media Project.

### **Objectives**

The objectives of this Accord are:

- to ensure that shareholding volunteer member against whom allegations are made are dealt with in a fair and equitable manner, and
- to provide an adequate means by which impropriety can be dealt with effectively and the highest standards of conduct be maintained.

### **Causes for activating the Accord**

There are several areas covered by this Accord, including but not limited to:

- Unsatisfactory performances of one's voluntary duties.
- Absence without proper notification
- Any form of abuse or aggression
- Being unfit to carry out one's duties
- Ignoring a request or requirement of the Co-op Management.
- Breaching the Rules and Policies of Near Media Co-op.

### **Procedures**

The Committee of Management, acting through its agents, the Coordination Committee and the Project Coordinator, as the persons dealing with Operations, will write to the shareholding volunteer member(s) in question, requesting them to attend a Formal Review Meeting, explaining the reasons for the meeting:

- Outlining the shareholding volunteer members alleged misconduct.
- Reiterating possible outcomes, including; lifting of any sanctions, continuation of suspension or confirmation of dismissal, which will depend on severity of alleged activity.

The normal course of events will be:

- First written warning

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- Final written warning
- Dismissal.

### **The Formal Review Process**

In cases where a shareholding volunteer member has been deemed to be in breach of procedures or where conduct is deemed to be unsatisfactory, the Coordination Committee can decide to request the attendance of the shareholding volunteer member(s) at a formal review of the situation, The nature and/or degree of a shareholding volunteer members misconduct will generally determine the appropriate action to be taken.

- Reconciliation: If the matter under consideration is of a lesser nature, the Coordination Committee may seek to resolve the matter amicably with the shareholding volunteer member and to find a way for the shareholding volunteer member to continue in that role.
- Suspension: Depending on the scale of the alleged misconduct, the Project Coordinator with the consent of the Coordination Committee may decide in the interim, to suspend the shareholding volunteer member(s) and the relevant programme, if in question, before the review meeting, or upon the issue of a written warning.
- Dismissal: In the case of gross misconduct, the Committee of Management, through the Coordination Committee, reserve the right under this accord to immediately dismiss a shareholding volunteer member or shareholding volunteer members. Such a letter of dismissal will be sent to the dismissed shareholding volunteer member(s) by the Co-op Secretary.
- The Review: Written communication between the Coordination Committee and the shareholding volunteer member under review shall be confined to: 1) any written warning(s), 2) the summoning to the formal review meeting, outlining the shareholding volunteer members alleged misconduct and reiterating possible outcomes and finally, 3) a written notification to the shareholding volunteer member of the outcome. A file on this correspondence shall be kept for a reasonable time. It may be necessary to include relevant correspondence from the shareholding volunteer member prior to the review, but these should not be responded to, but should be dealt with during the review meeting.
- The Committee of Management shall deal similarly with an appeal, issuing only a letter of outcomes.
- All shareholding volunteer members will be expected to co-operate fully in the review of allegations of impropriety by providing such explanations as are sought in the course of the review.

### **Discretion**

The matter under review shall be dealt with by the Coordination Committee, in a manner that protects the dignity of the shareholding volunteer member and shall not be conducted in the presence of other shareholding volunteer members, staff or

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the general public. For operational reasons the Coordination Committee may need to inform necessary parties of a suspension, but otherwise, it will not be alluded to by them in any public fora. A shareholding volunteer member in this review process, with no such operational imperatives, will be expected to conduct themselves in a similarly discreet manner and to confine their comments on the matter to the formal review exercise.

### **Participation**

The Coordination Committee will act to hold the formal review of the alleged action(s) as soon as possible and will establish an agreed date and time with the shareholding volunteer member. Should the shareholding volunteer member fail to attend, the absence and conclusions will be noted in the minutes of the meeting. The minutes of the review meeting are the property of Near Media Co-op and may be shared with the shareholding volunteer member if deemed appropriate. A shareholding volunteer member under review, if they wish, may keep their own contemporaneous written notes and/or bring another shareholding volunteer member to such review meeting.

### **Outcome**

Following the review meeting, the Coordination Committee will discuss the matter and make a decision. As the Coordination Committee is primarily composed of shareholding volunteer members, the decision will be taken and communicated in writing to the shareholding volunteer member under review as soon as possible, but not later than 28 days.

### **Appeal**

A shareholding volunteer member sanctioned under this governance accord may appeal the result to the Committee of Management, who will attempt to have the matter dealt with at the next available meeting of that committee. The appellant will receive written notification of the outcome soon thereafter. Or, the sanctioned shareholding volunteer member may lodge a complaint through the grievance route, but not before the review process is completed.

### **The Committee of Management**

The elected Management Committee of Near Media Co-op will have several functions in such a situation. If there is an appeal, to deal with it, minute it, and communicate the decision to the appellant. If there is no appeal, to hear and minute a report on the matter from the Project Coordinator.

### **Notification:**

While the Committee of Management, nor its agents, will make no public comment during the formal review period, at the conclusion, they may decide that the general

shareholding volunteer membership and any interested parties would benefit from clarification of such governance outcomes.

**Status:**

This Governance Accord was approved by a General Meeting of Near Media Co-operative on 5<sup>th</sup> March 2014.

## **NEAR MEDIA CO-OP SOCIAL MEDIA POLICY**

### ***Policy***

This is the official Policy, approved by the Committee of Management, for participating in social media for Near Media Co-op. If you're a Near Media Co-op employee or shareholding volunteer member creating or contributing to blogs, wikis, social networks, social bookmarking or any other kind of digital media, these guidelines are for you. This policy applies to the use of digital media both for undertaking tasks and duties, work and personal purposes, whether in a capacity as a shareholding volunteer member at work or otherwise. The policy applies regardless of whether the digital media is accessed using our facilities and equipment or personal equipment. Please note, this policy links to all other policies therefore social & digital media should never be used in a way that breaches any of our other policies (you can find our policies in Near Media Co-op Operations and Procedures handbook: <http://near.ie/operations-and-procedures-manual/> )They will

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evolve as new social networking tools emerge, so check back regularly to make sure you're up to date.

**We believe that, participation in social computing on behalf of Near Media Co-op is not a right but an opportunity, so please treat it seriously and with respect.** Failure to abide by these guidelines or the Near Media Co-op internet safety guidelines contained in this policy could put your participation at risk. Please also follow the terms and conditions for any third-party sites.

### **Use of the Near Media Brand Guidelines**

Use of 'Near', 'Near FM' 'Near TV' or any other variant of the Near brand in personal email / Facebook, Twitter or any other Social Network, Blog, Vlog or any other digital account must be cleared by Near Media Co-op Management. Please check with the Social Media moderator before setting up any user name containing the Near brand. If you set-up any account without prior approval, Near Media Co-op reserve the right to require it to be discontinued.

Social Media Moderator: Alan Braddish (Alan@near.ie)

If you publish to any digital platform outside Near Media Co-op, please also use a disclaimer to reflect that the postings on the site are your own and don't necessarily represent Near Media Co-op's positions, strategies, or opinions.

Please also tag Near Media Co-op (by including media appropriate reference, page/profile/hashtag or link in your post) to allow the promotion of your posts.

- **Be transparent:** Use your real name, identify that you work for or shareholding volunteer member with Near Media, and be clear about your role.
- **Be truthful:** If you have a vested interest in something you are discussing; be the first to point it out and be specific about what it is.
- **Be yourself:** Stick to your area of expertise; write what you know.

- Your honesty - or dishonesty - will be quickly noticed in the social media environment. Please represent Near Media Co-op ethically and with integrity. Make sure that transparency doesn't violate Near Media Co-op's confidentiality or legal guidelines - or your own privacy. Remember, if you're online, you're on the record - everything on the Internet is public and searchable. And what you write is ultimately your responsibility.
- **Add value:** There are millions of words out there - make yours helpful and thought-provoking. Remember it's a conversation, so keep it real. Build community by posting content that invites responses then stay engaged. You can also broaden the dialogue by citing others who are writing about the same topic and allowing your content to be shared.
- If you see content in social media that disparages or reflects poorly on Near FM, Near TV or Near Media Co-Op, you should report it to the Social Media Moderator. All shareholding volunteer members and employees are responsible for protecting our reputation.

### **Moderation**

Moderation applies to any content written on behalf of Near Media Co-op, whether the site is on or off near.ie, including on social media or any other digital platform.

We do not endorse or take responsibility for content posted by third parties, a.k.a. user-generated content (UGC). This includes text input and uploaded files, including video, images, audio, executables and documents. While we strongly encourage user participation, we ask third parties to follow Internet Safety Guidelines to keep it safe for everyone.

Of particular importance here is the received verbal consent of any person whose image you want to include either in reference to, or in promotion of your Near FM/Near TV programme or related project. Please note, Near Media Co-Op does not permit tagging of vulnerable adults or anyone under the age of 18.

**The “house rules”:** Whether content is post-moderated or community moderated, we use this rule of thumb: **Tell the truth and don’t be nasty.**

- If the content is positive or negative and in context to the conversation, then it is okay, regardless of whether it’s favorable or unfavorable to Near Media Co-op. In addition, if the content is ugly, offensive, denigrating, and/or completely out of context, then we ask our moderators and communities to reject the content.

Please keep in mind that Near Media Co –Op monitors social media related to our organisation, including the activities of our community. If we find any non-disclosed relationships or statements that are false or misleading, we will contact you for correction.

### ***Internet Safety Guidelines***

- **Don't slam another organisation:** Play nice. Anything you publish must be true and not misleading, and all claims must be substantiated and approved.
- **Don't over share:** Be careful out there - once you hit "share", you usually can't get it back. Plus being judicious will help make your content more crisp and audience-relevant.
- **Perception** is reality and in online social networks, the lines between public and private, personal and professional are blurred. Just by identifying yourself as an Near employee or shareholding volunteer member you are creating perceptions about your expertise and about Near Media Co-op.
- **Keep it cool:** There can be a fine line between healthy debate and incendiary reaction. Try to frame what you write to invite differing points of view without inflaming others. And you don't need to respond to every criticism or barb. Be careful and considerate.
- **Did you screw up?** If you make a mistake, admit it. Be upfront and be quick with your correction. If you're posting to a blog, you may choose to modify an earlier post, just make it clear that you have done so.

- **Keep it relevant & timely** – To make sure postings on official and personal digital media outlets are relevant and current, we encourage starting conversations about related events and topics, we only ask not to over-share or mention same event/topic several times in row. Make sure to check with your colleagues if this may become an issue.
- Digital media rewards interesting and witty thoughts. You can be interesting without being controversial.

Keep in mind that what you write is your responsibility and failure to abide by these guidelines could put your Near Media Co-op activities at risk. Also please always follow the terms and conditions for any third-party sites in which you participate. Remember as employee or shareholding volunteer member you are a representative of Near Media Co-op and you have committed yourself to positively promoting this project. Should you have problems or difficulties within the organisation these should be dealt with through the specified Grievance Procedure and not publicly through any social media platform.

## NEAR MEDIA CO-OP DIVERSITY AND INCLUSION POLICY

At NEAR Media Coop **Diversity, Equity, and Inclusion** are at the core of who we are. Diversity must be present in all that we are and all that we do, from the Committee of Management to the content we produce. It must live in our content, hiring policies, training, audience, workplace, our partnerships, and our collaborations with community media organisations across the world.

Media has the power to affect perceptions of diverse communities. The power of inclusion is that it allows us to hear the stories and voices of people who are often under-covered, misrepresented or left out. Inclusion promotes mutual understanding between all cultures within our community.

Our processes are designed to prevent discrimination against our people regardless of gender identity or expression, sexual orientation, religion, ethnicity, age, neurodiversity, disability status, citizenship, or any other aspect which makes them unique.

Some of the greatest stories and the greatest ideas come from a diverse mix of experiences and background Our mission is to provide an alternative to mainstream media by offering an outlet for those underrepresented or excluded through training and access to distribution facilities. This policy reinforces our commitment to our founding mission.

Near Media Co-op:

- Guarantees the rights of all people involved with Near Media Co-op;
  - Ensures representation of voices that are consistently marginalised in the media;
  - Fosters a sense of belonging for all who participate with Near Media Coop;
  - Communicates Near Media Co-operative's ethos and intercultural approach in an accessible way;
  - Protects Near Media Co-op from charges of incitement to hatred;
  - Makes a clear statement to those within and beyond Near Media Co-op about the fundamental importance we place on equality
- 
- The Committee of Management of the Near Media Co-op aims for gender balance and diversity in its make-up.
  - We strive for gender balance on all sub-committees
  - We are committed to a diversity of voices and faces on our programming.
  - Part of our strategic plan is a commitment to gender balance in our voices on-air, and starting from a low base, this has been improving over the years.

- We deliver training courses for women, migrant groups and other minorities to help us achieve this aim.

## DATA PROTECTION POLICY

### Introduction

Near Media Co-op needs to collect and use data (information) for a variety of purposes about its staff, shareholding volunteer members and other individuals who come in contact with the Co-op. The purposes of processing data include the organisation and administration of training courses, radio and TV programming, research activities, the recruitment and payment of staff, compliance with statutory obligations, etc. Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data. The Data Protection Act 1988, the Data Protection (Amendment) Act 2003 and the Data Protection 2018 confer rights on individuals as well as responsibilities on those persons processing personal data. Personal data, both automated and manual are data relating to a living individual who is or can be identified, either from the data or from the data in conjunction with other information.

### Purpose of this policy

This policy is a statement of the Co-op's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003.

### Collecting information about you.

We collect and use information to provide the following services:

- To provide a community media service, which includes Near FM, Near TV productions and near.ie.
- To undertake this service with the financial support of statutory bodies, including the City of Dublin Education & Training Board, Department of Employment Affairs and Social Protection/INTREO and the Broadcasting Authority of Ireland.
- To provide you with regular updates about near media co-op using our newsletter, which may be circulated via email, hard copy and on our website.
- To provide you with information about ongoing training, general meetings and other activities in near media co-op
- To perform accounting and other record-keeping functions.
- To keep your information secure.
- To enhance or improve your experience on our website.



In general terms, the data we collect from you is your name, address, telephone number and email address. We may also collect your PPSN number and bank account details where we are making any payment to you for services provided.

### **Principles of the Acts**

The Co-op administers its responsibilities under the legislation in accordance with the eight stated data protection principles outlined in the Acts as follows:

1. Obtain and process information fairly  
The Co-op obtains and processes personal data fairly and in accordance with the fulfilment of its functions.
2. Keep it only for one or more specified, explicit and lawful purposes  
The Co-op keeps data for purposes that are specific, lawful and clearly stated and the data is only processed in a manner compatible with these purposes.
3. Use and disclose it only in ways compatible with these purposes  
The Co-op only discloses personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data.
4. Keep it safe and secure  
The Co-op takes appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. The Co-op is aware that high standards of security are essential for all personal information.
5. Keep it accurate, complete and up-to-date  
The Co-op has procedures that are adequate to ensure high levels of data accuracy. The Co-op regularly examines the general requirement to keep personal data up-to-date. The Co-op has in place, appropriate procedures to assist staff in keeping data up-to-date.
6. Ensure that it is adequate, relevant and not excessive  
Personal data held by the Co-op is adequate, relevant and not excessive in relation to the purpose/s for which it is kept.
7. Retain it for no longer than is necessary for the purpose or purposes  
The Co-op has a policy on retention periods for personal data.
8. Give a copy of his/her personal data to that individual, on request  
The Co-op has procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation. To make an access request, please submit your request in writing to Ciaran Murray, near media co-op, Northside Civic Centre, Bunratty Road, Dublin 17. E-mail: [ciaran@near.ie](mailto:ciaran@near.ie)  
Please ensure that you describe the records you seek in the greatest detail possible to enable us to identify the relevant records.

### **Responsibility**

Near Media Co-op has overall responsibility for ensuring compliance with the Data Protection legislation. However, all employees and shareholding volunteer members of the Co-op who collect and/or control the contents and use of personal data are

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also responsible for compliance with the Data Protection legislation. The Co-op provides support, assistance, advice and training to all departments, offices, staff and shareholding volunteer members to ensure it is in a position to comply with the legislation.

The standard of security expected of all employees and shareholding volunteer members of Near Media Co- op includes the following:

- access to the information restricted to authorised staff/shareholding volunteer members on a "need-to- know" basis in accordance with a defined policy,
- computer systems password protected,
- information on computer screens and manual files kept hidden from callers to offices,
- back-up procedures in operation for computer held data, including off-site back-up,
- all waste papers, printouts, etc. disposed of carefully by shredding,
- all employees/shareholding volunteer members must log off from their computer on each occasion when they leave the workstation,
- personal security passwords must not be disclosed to any other employee/shareholding volunteer member of Near Media Co-op,
- all Near Media Co-op premises to be secure when unoccupied,

#### **Procedures and Guidelines**

This policy supports the provision of a structure to assist in the Co-op's compliance with the Data Protection legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

#### **Review**

This Policy will be reviewed regularly in light of any legislative or other relevant indicators.

The point of contact for further information is Sabrina Ryan, Secretary, Near Media Co-op (Sabrina[@near.ie](mailto:Sabrina@near.ie)) or Ciaran Murray, Project Co Ordinator ([Ciaran@near.ie](mailto:Ciaran@near.ie))

## **DATA RETENTION POLICY**

Near Media Co-op retains all important documentation (statutory/employment) including information pertaining to financial records and employment contracts or

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service contracts for a minimum period of 7 years. All other personal contact details pertaining to shareholding volunteer members and staff are shredded one year after the person in question has stopped shareholding volunteer membership or has ended their employment with Near Media Co-op.

All documents are stored in secure containers within Near Media Co-op's premises.

This policy embraces the principles of best practice in relation to document retention policies in the Republic of Ireland.

*near media co-operative May 2018*

## **PRIVACY STATEMENT**

Comhar Chumann Cumarsaide Pobal Bhaile Átha Cliath Thoir-Thuidh Teoranta, Dublin North East Community Communications Co-operative Society Ltd (Near Media Co-op), the publisher of near.ie, is committed to protecting your privacy. References to “we”, “us”, “you” or “our” in this Privacy Policy are references to Near Media Co-op, a registered co-operative. RFS No: 4128R

We have adopted this Privacy Statement to let you know how your personal information is processed and used. We promise that we will take steps to use your personal information only in ways that are compatible with this Privacy Statement.

Near Media Co-operative confirms that it adheres to **key responsibilities** as set out by the Data Protection Commissioner and with respect to the Irish Data Protection Acts 1988, 2003 and 2018. With any personal data collected by near media co-operative, we aim to:

1. **Obtain** and process the information fairly;
2. **Keep** it only for one or more specified and lawful purposes;
3. **Process** it only in ways compatible with the purposes for which it was given to Near Media Co-op initially;
4. Keep it **safe and secure**;
5. Keep it **accurate and up-to-date**;
6. Ensure that it is **adequate, relevant and not excessive**;

7. Retain it **no longer than is necessary** for the specified purpose or purposes;
8. **Give a copy of his/her personal data** to any individual, on request.

The following policies are only in effect for the web pages, newsletters, discussion lists and opt-in announcement lists owned and operated by Near Media Co-operative, including near.ie, nearfm.ie, neartv.ie, mediacoop.ie, nearintercultural.ie, neararchive.org, nearpodcast.org, archive.ie, nearchoice.ie, neardigital.ie, medialiteracy.ie

### **What information are we collecting and how are we collecting it?**

We collect personal information from you when you enquire about our activities, ring, text or email for information and advice, register for a shareholding volunteer member course with us, submit an on-air radio request or subscribe to one of our services. This may include your name, title, email address, physical address and telephone numbers.

Every computer connected to the Internet is given a domain name and a set of numbers that serve as that computer's "Internet Protocol" or IP address. When a visitor requests a page from any website within Near Media Co-op's online network, our web servers automatically recognize that visitor's domain name and IP address. The domain name and IP address reveal nothing personal about you other than the IP address from which you have accessed our site. We use this information to examine our traffic in aggregate, but do not collect and evaluate this information for individuals.

If you email Near Media Co-op, we will retain a copy of your correspondence, and any reply from us, on our servers.

We may share your information with other third parties in order to carry out our services effectively. For example in order to receive the newsletter you must be held on a database stored in Mailchimp. You will be informed if we share your personal data with a third party if it applies to the service you signed up for and we promise not to share your personal data with any other third parties or marketing companies if you have not consented to do so.

### **What are cookies?**

From time to time, near.ie or nearfm.ie, neartv.ie, mediacoop.ie, nearintercultural.ie, neararchive.org, nearpodcast.org, archive.ie, nearchoice.ie, neardigital.ie, medialiteracy.ie may send a "cookie" to your computer. A cookie is a small piece of data that is sent to your browser from a web server and stored on your computer's hard drive. A cookie cannot read data off your hard disk or read

cookie files created by other sites. Cookies do not damage your system. We use cookies to identify which areas of the suite of near websites that you have visited or customized, so that in time we may provide a better and more personalized experience for you.

You can choose whether to accept cookies by changing the settings of your browser. You can reset your browser to refuse all cookies, or allow your browser to show you when a cookie is being sent. If you choose not to accept these cookies, your experience at our site may be diminished and some features may not work as intended.

### **What other information do we request?**

We may also request your e-mail address or mailing address for the purposes of conducting a survey or to provide additional services (for example, subscriptions to e-mail newsletters, announcement lists or information about Near Media Co-op events). Whenever we request the identity of a visitor, we will clearly indicate the purpose of the inquiry before the information is requested. In addition, we will not send you e-mail that you have not agreed to receive. If you do not wish to receive further updates, you can opt-out by sending an email to [mailinglist-unsubscribe@near.ie](mailto:mailinglist-unsubscribe@near.ie)

### **Will we disclose the information you collect to outside third parties?**

Near Media Co-op may share aggregate information about our users to third parties but will not share any personally identifiable information about you without your expressed consent.

### **Security**

Near Media Co-op uses reasonable precautions to keep the information disclosed to us secure. This includes the use of password protection and regular maintenance of our servers. We do not sell, rent, or otherwise give your e-mail address to a third-party without your consent. Furthermore, we are not responsible for any breach of security or for any actions of any third parties who receive the information. As a directory, near.ie including nearfm.ie, neartv.ie, mediacoop.ie, nearintercultural.ie, neararchive.org, nearpodcast.org, archive.ie, nearchoice.ie, neardigital.ie, medialiteracy.ie has links to a wide variety of other sites. We are not responsible for their privacy policies or how they treat information about their users.

Please note that Near Media Co-op will release specific personal information about you if required to do so in order to comply with any valid legal process such as a search warrant, subpoena, statute, or court order. *'We reserve the right to release personal information without your consent or without consulting you, when we believe that this is appropriate to comply with our legal obligations, to enforce our terms and conditions or other legal rights, to protect the security of the Site, to*

*prevent fraud, or otherwise to protect our legitimate interests and/or the legitimate interests of our users.'*

Near Media Co-op takes its obligations very seriously and adopts the strongest line in relation to the misuse of customer information by any of its staff. Any breach of trust with regard to the confidentiality of information is treated as serious misconduct and may result in disciplinary action up to and including dismissal in accordance with the terms of the Disciplinary Code.

In accordance with the Data Protection Acts, Near Media Co-op will not keep data for longer than is necessary for the purpose to which it was received. In general we hold your contact details for as long as you subscribe to our newsletter and/or other mailing lists. In the case of a shareholding volunteer member we will hold your contact information as long as you remain as a shareholding volunteer member with Near Media Co-op

### **Your Consent to This Agreement**

By using our near.ie nearfm.ie, near.tv.ie, mediacoop.ie, nearintercultural.ie, neararchive.org, nearpodcast.org, archive.ie, nearchoice.ie, neardigital.ie, medialiteracy.ie websites, you consent to the collection and use of information by us as specified above. If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

Near Media Co-operative has procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation. To make an access request, or if you would like us to correct, update or delete any information we hold on you, from our records, under the Data Protection Acts 1988, 2003 and 2018, please submit your request in writing to Ciaran Murray, near media co-op, Northside Civic Centre, Bunratty Road, Dublin 17. E-mail: [ciaran@near.ie](mailto:ciaran@near.ie) Please ensure that you describe the records you seek in the greatest detail possible to enable us to identify the relevant records.

The point of contact for further information is Sabrina Ryan, Secretary, near media co-operative ([Sabrina@near.ie](mailto:Sabrina@near.ie)) or Ciaran Murray, Project Co-ordinator ([Ciaran@near.ie](mailto:Ciaran@near.ie)).

### **DISCLAIMER**

All information contained on the near.ie website is intended for informational and educational purposes.

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## **NEAR MEDIA CO-OP RISK MANAGEMENT POLICY**

### ***Purpose of this document***

1. The policy forms part of the Near Media Co-op's internal control and governance arrangements.
2. The policy explains Near Media Co-op's underlying approach to risk management, documents the roles and responsibilities of the Committee of Management and other key parties. It also outlines key aspects of the risk management process, and identifies the main reporting procedures.
3. In addition, it describes the process the Committee of Management will use to evaluate the effectiveness of Near Media Co-op's internal control procedures.

### ***Underlying approach to risk management***

4. The following key principles outline Near Media Co-op's approach to risk management and internal control:
  - the Committee of Management has responsibility for overseeing risk management within Near Media Co-op as a whole
  - an open and receptive approach to solving risk problems is adopted by the Committee of Management
  - staff and key shareholding volunteer members support, advise and implement policies approved by the Committee of Management

- Near Media Co-op makes conservative and prudent recognition and disclosure of the financial and non-financial implications of risks
- all staff are responsible for encouraging good risk management practice within their areas of work
- key risks will be identified by the Committee of Management and closely monitored on a regular basis.

### ***Role of the Committee of Management***

5. The Committee of Management has a fundamental role to play in the management of risk. Its role is to:
  - a. Set the tone and influence the culture of risk management within Near Media Co-op. This includes:
    - communicating the Near Media Co-op's approach to risk
      - determining what types of risk are acceptable and which are not
      - setting the standards and expectations of staff with respect to conduct and probity.
  - b. Determine the appropriate risk appetite or level of exposure for Near Media Co-op.
  - c. Approve major decisions affecting Near Media Co-op's risk profile or exposure.
  - d. Identify risks and monitor the management of fundamental risks to reduce the likelihood of unwelcome surprises.
  - e. Satisfy itself that the less fundamental risks are being actively managed, with the appropriate controls in place and working effectively.
  - f. Annually review the Near Media Co-op's approach to risk management and approve changes or improvements to key elements of its processes and procedures.



## ***Role of Key Staff and Shareholding volunteer members***

6. Roles of key staff and shareholding volunteer members are to:
  - a. Implement policies on risk management and internal control.
  - b. Identify and evaluate the fundamental risks faced by Near Media Co-op for consideration by the Committee of Management.
  - c. Provide adequate information in a timely manner to the Committee of Management and its sub-committees on the status of risks and controls.
  - d. Undertake an annual review of effectiveness of the system of internal control and provide a report to the Committee of Management.

## ***Risk management as part of the system of internal control***

7. The system of internal control incorporates risk management. This system encompasses a number of elements that together facilitate an effective and efficient operation, enabling Near Media Co-op to respond to a variety of operational, financial, and commercial risks. These elements include:

### ***a. Policies and procedures.***

Attached to fundamental risks are a series of policies that underpin the internal control process. The policies are set by the Committee of Management and implemented and communicated to staff. Written procedures support the policies where appropriate, and are set out in the Employee Handbook, and the Operations and Procedures Manual.

### ***b. Reporting.***

Comprehensive reporting is designed to monitor key risks and their controls. Decisions to rectify problems are made at regular meetings of the Committee of Management.

### ***c. Strategic planning and budgeting.***

The strategic planning and budgeting process is used to set objectives, agree action plans, and allocate resources. Progress towards meeting strategic plan objectives is monitored regularly.

### ***d. External audits and Third party reports.***

External audit provides feedback to the Committee of Management on the operation of the internal controls reviewed as part of the annual audit.

From time to time, the use of external consultants may be necessary in areas such as health and safety, and human resources. The use of specialist third parties for consulting and reporting can increase the reliability of the internal control system.

***e. Risk Management Process.***

Near Media Co-op operates a risk management process/framework as follows:

- A review/appraisal of the previous year's risk management report
- A 'risk identification' exercise for the year ahead
- Evaluation of identified risks using risk assessments
- Manage risks through application of risk management techniques
- Record and monitor risks using risk registers
- Assigning responsibility for risks to appropriate personnel.

Risk identification is not an annual process. Committee of Management/Staff members are encouraged to report and update risk registers and carry out assessments throughout the year.

***Annual review of effectiveness***

8. The Committee of Management is responsible for reviewing the effectiveness of internal control of Near Media Co-op, based on information provided by the senior employees. Its approach is outlined below.
9. For each fundamental risk identified, the Committee of Management will:
  - review the previous year and examine the Near Media Co-op's track record on risk management and internal control
  - consider the internal and external risk profile of the coming year and consider if current internal control arrangements are likely to be effective.
10. In making its decision the Committee of Management will consider the following aspects.
  - a. Control environment:
    - Near Media Co-op's objectives and its financial and non-financial targets
    - organisational structure and calibre of the staff/key shareholding volunteer members

- culture, approach, and resources with respect to the management of risk
  - delegation of authority
  - public reporting.
- b. On-going identification and evaluation of fundamental risks:
- timely identification and assessment of fundamental risks
  - prioritisation of risks and the allocation of resources to address areas of high exposure.
- c. Information and communication:
- quality and timeliness of information on fundamental risks
  - time it takes for control breakdowns to be recognised or new risks to be identified.
- d. Monitoring and corrective action:
- ability of Near Media Co-op to learn from its problems
  - commitment and speed with which corrective actions are implemented.
11. The delegated member of staff responsible for risk management will prepare a report of its review of the effectiveness of the internal control system annually for consideration by the Committee of Management.

## NEAR MEDIA CO-OP HEALTH & SAFETY STATEMENT

### ***Safety Statement:***

This statement sets out the health & safety policy of Near Media Co-Op and the means through which that policy is to be implemented. Our objective is to meet our duties and obligations to our staff and shareholding volunteer members by providing a safe and healthy working environment.

It is Near Media Co-Op's intention to protect our employees from accident or ill health at work. Near Media Co-Op will seek to ensure that all our equipment and systems do not constitute a risk to the Health & Safety of our employees and we will consult with employees on risk improvements.

### **Our approach to Health & Safety as far as is reasonably practicable will be:**

1. To Provide a Safe Place of Work.
2. To continue to identify and control hazards.
3. To prevent as far as is reasonably possible, any improper conduct or behavior likely to put the Safety, Health & Welfare of employees at risk.
4. To consult with staff on all Health & Safety matters.
5. To provide protective clothing and equipment where necessary.
6. To provide a safe means of entering and leaving the building.
7. To provide a safe system of work practices.
8. To provide appropriate information and training to staff shareholding volunteer members on a continuous basis.
9. To make Health & Safety a key issue.

### ***Employer Responsibilities:***

The responsibility for the provision of a safe place of work rests with the Committee of Management of Near Media Co-Op. **Specifically these responsibilities are:**

- To maintain a safe and healthy work environment for employees, in addition to conforming to all current statutory requirements.
- To provide the appropriate type and level of training to enable employees perform their work safely and efficiently.
- To make available to every employee appropriate equipment to ensure Health & Safety.
- To maintain a vigilant and continuing interest in all Health & Safety matters relevant to both the co-op and staff.

### ***Employee Responsibilities:***

As a valued employee of Near Media Co-Op, you have a responsibility to yourself and your fellow workers to carry out your work in a safe and considerate manner.

Employees must:

1. Co-Operate with the co-op in maintaining a safe work place.
2. Report any potential hazards to management and not work in any hazardous conditions should they; in the employee's opinion exist.
3. Be aware of the nearest emergency exits and firefighting / first aid equipment.
4. Never interfere with or misuse anything provided by the co-op in the interests of Health & Safety.
5. Read the co-op Health & Safety statement and obey all mandatory signs.
6. Not partake in any form of horseplay or prank likely to lead to injury to you or others.

### ***Smoking/Alcohol and Drugs:***

It is not permissible to attend work under the influence of intoxicating liquor or drugs. The smoking of tobacco products is prohibited in the offices of Near Media Co-Op.

Smoking can take place outside the co-op building at least 3 metres distance away from door entrances and windows.

This smoking policy forms part of the overall Health & Safety Policy and any breach will be dealt with under the Co-op's disciplinary procedure.

Visitors, contractors, shareholding volunteer members and staff are expected to abide by the terms of this policy. This policy also prohibits the use of electronic cigarettes (e-cigarettes), personal vaporisers (PV) or electronic nicotine delivery systems (ENDS), commonly known as 'vaping'

### ***Manual Handling:***

Manual Handling is defined as the "transporting of a load by one or more employees and includes lifting, putting down, pushing, carrying or moving a load, which by reason of its characteristics or of unfavourable ergonomic conditions involves risks, particularly of back injury to employees".

This is a priority issue because it is a major cause of accidents in the workplace. It is Near Media Co-Op's policy to minimise the need for manual handling of loads and so therefore should be avoided as far as is reasonably practicable.

Employees must check the weight of the load before attempting to lift it and if the load is too heavy get help. **When lifting, follow the following basic principles.**

1. Relax the knees. Lowering movements should start at the knees not the head.
2. Get close to the object to be lifted. Get a good balance by keeping the feet apart. One foot will automatically be ahead of the other.
3. When in position, bend the knees and lift with the strong muscles in the legs.

4. Lift gradually, smoothly and without jerking, keeping the object close to the body and the back straight.

### ***Training:***

The co-op is committed to identifying the safety training needs on an ongoing basis. Staff will be involved in the identification of hazards in the office and advised of the particular hazards pertaining to their area. Staff will be trained to respond to such hazards in order to prevent accidents/injury to themselves, their colleagues and clients.

All staff will be trained in emergency procedures and where appropriate, staff will be trained in the use of special machinery and equipment. All staff will be trained in the correct techniques involved in safe manual handling.

### ***Consultation:***

The co-op is committed to consulting with its staff shareholding volunteer members regarding safety, health and welfare in the office. Staff is involved in the identification of hazards and are trained in dealing with the hazards identified.

The safety statement will be included in Induction Training and staff will be advised on how to deal with any problems that arise.

### ***Reporting of Accidents:***

Staff are required to report all accidents and near misses, whether resulting in injury or not, to management. Under the Safety, Health & Welfare at Work General Application Regulations 1993, employers must report certain occurrences to the Health & Safety Authority and ensure records are kept on site for a period of 10 years.

The following details are required:

- Date, Time and Place of the incident.
- Name, Address, Occupation and Age of the injured person.
- Circumstances, including cause and nature of the injury and the arrangements made for its treatment. (See Appendix 1)

All accidents will be investigated by a shareholding volunteer member of management and a written report prepared. Corrective action will be taken where necessary to avoid a reoccurrence.

Accidents involving persons who are not shareholding volunteer members of staff but are visiting or working on the premises must also be reported.

### ***Fire Procedures:***

In the event of a fire and providing there is no danger to the persons concerned every effort should be made to extinguish or contain the fire pending the arrival of

the fire brigade. The magnitude of the outbreak must dictate whether attacking the fire should take priority over reporting and evacuation.

All staff should be familiar with the exit routes and should also know the location and type of fire extinguishers in the office.

**If you discover a fire you should:**

- Activate the fire alarm.
- If there is a reasonable hope of extinguishing the blaze, attack the fire immediately.
- Do not under any circumstances, expose yourself to danger.
- Leave the building by the nearest fire exit and proceed to your designated assembly point.

**If you hear the alarm you should:**

- Switch off any equipment under your control and leave the building by the nearest fire exit.
- Do not stop to collect personal belongings.
- Once outside, do not enter the building until you are told it is safe to do so.
- Management will on occasion perform fire drills to ensure that procedures are known and followed in the event of a real fire.

***Guidelines for VDU users***

As part of their duties some employees spend long periods of time using visual display screens. Any necessary adjustments will be made to avoid RSI, eyestrain and other ailments associated with work on screens, which must be adjustable for height, tilt and brightness. No employee will be asked or expected to work any computer which is not in proper working condition, or does not meet the highest specifications.

Employees working continuously on-screen should alternate tasks so that at least 10 minutes during each 60 minutes of work is spent doing off-screen type of work. This work is to be undertaken away from the screen, but does not constitute a break.

Employees who habitually use VDU's have the right to an eyesight test, the cost of which will be met or reimbursed by the co-op.

***Hazard Analysis:***

A hazard is anything at work that might cause harm e.g. Electricity, Hot Surfaces, Lifting Heavy Loads, Slippery Floors, and Poorly Lit Stairways etc. Staff must be aware of the potential hazards and risks involved and report specific hazards to management.

A hazard analysis will be carried out once a year by Management. Particular attention will be paid to areas of high risk i.e. Floors, Stairs and Manual Handling. The co-op will remove hazards by engineering means where necessary.

### ***First Aid:***

First Aid boxes are provided to ensure that first aid supplies are easily accessible when required in an emergency. First Aid boxes are located at Northside Civic Centre Office, Near TV productions office and Near Online Office. They are to be checked weekly and shortages replaced. Employees have an obligation to ensure that First Aid Boxes, like any safety equipment, are not tampered with. Free access to First Aid Boxes must be maintained at all times. Painkillers cannot be provided in the First Aid Boxes.

### ***Security:***

Responsibility for building security rests with the management company of the building (i.e. CDC and Civic Centre) All visitors must comply with whatever security arrangements are in place. In some cases a swipe card is required for entry, in others a sign-in book is used. Any difficulties should be brought to the attention of the Project Co-Ordinator or Committee of Management.

### ***Offsite Work Practice***

All Staff and assigned Shareholding volunteer members will when working off site:

- inspect the work area for potential hazards before starting work, and ensure that there is sufficient space and that the space provided in the vicinity of any equipment is adequate, to enable the operation of same and will mitigate against injury to themselves or others.
- All Equipment on site will be subject to annual Safety audit and will be operated in accordance with best practice methodology
- On site Near Media Co-op will designate a suitably qualified individual as lead person. A technical competent person will function as technical coordinator and will refer to best practise when assessing the location and the layout of any Equipment in use.
- This person will insure correct use of transport equipment such as trollies and camera dolly tracks. A designated individual will act as safety supervisor.
- Suitable H&S protective equipment will be used for the mitigation of trip and other hazards, this will include the securing of trip hazards such as trailing power and Audio/video cabling.

Prior to the deployment of any temporary equipment or structure a suitably qualified individual will carry out a risk assessment of any proposed site this will include:

- Equipment location

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- Fire hazards
- Fire escape Plan of building
- Map the siting of any proposed Trailing cables
- A short Statement of works will be prepared stating the purpose of the visit

This will highlight any significant Hazards that may present.

All relevant safety procedures will be followed in line with:

- Health and safety authority
- Comreg
- Broadcast Authority of Ireland

Signed on behalf of Near Media Co-Op

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Declan Cahill  
Chairperson

Near Media Co-Op

## ***Appendix 1***

### **ACCIDENT OR NEAR MISS REPORTING FORM**

Date, Time and Place of the incident.

Name, Address, Occupation and Age of the injured person.

Circumstances, including cause and nature of the injury and the arrangements made for its treatment.

## **E-MAIL AND INTERNET USE**

Email enables Near Media Co-op to communicate promptly and efficiently with customers, suppliers, other community organisations and shareholding volunteer members. While e-mail brings many benefits to Near Media Co-op in terms of its communications, it also brings risks to Near Media Co-op. For this reason, it is necessary for Near Media Co-op to set down specific rules for the use of email and internet within Near Media Co-op.

Every shareholding volunteer member and staff shareholding volunteer member has a responsibility to maintain Near Media Co-op's image, to use electronic resources in a productive manner and to avoid placing Near Media Co-op at risk of legal liability based on their use.

Email is not to be used for private purposes and should not be used for any purpose other than Near Media Co-op business.

Near Media Co-op has access to the internet which enables staff and shareholding volunteer members to obtain information specific to their role within Near Media Co-op. Employees and shareholding volunteer members requiring access to the internet will need the approval of management. Internet connections are intended to support Near Media Co-op business or the professional development of employees. General internet access will only be provided with the permission of management. Sally Galliana, Alan Braddish or Ciaran Murray will be able to help further.

## CHILDREN AND VULNERABLE ADULTS PROTECTION POLICY & GUIDELINES

### ***Policy Statement***

Near Media Co-op is a communally owned, democratic, not-for-profit project open to all organisations and individuals in Dublin North-East. Near Media Co-op runs Near FM, Community Radio for North-East Dublin, Near TV Productions which provides community television content to Dublin City Community Television (DCTV) and a number of other community media activities.

These guidelines are intended to assist staff and shareholding volunteer members of Near Media Co-op who, for teaching, research or work reasons have contact with children or vulnerable adults, and who have any concerns in relation to the wellbeing and safety of children and vulnerable adults. This document provides advice to staff and shareholding volunteer members of Near Media Co-op on their responsibilities in relation to the protection and welfare of children and vulnerable adults. Near Media Co-op also supports the use of professional and safe practices when working with children and vulnerable adults. The guidelines are based on the “Children First: National Guidelines for the Protection and Welfare of Children” and are specific to the needs of Near Media Co-op. For the purpose of this document, the term “staff and shareholding volunteer member” may be a shareholding volunteer member of staff or shareholding volunteer member, intern of Near Media Co-op and those working on a voluntary or unpaid basis on behalf of the Co-op.

Under Irish law, a child is a person under the age of eighteen, who is not or has not been married (Child Care Act 1991). A vulnerable adult is a person aged 18 years or over who may require assistance to care for themselves, or protect themselves from harm or from being exploited. This may be because they have a disability (either mental health, intellectual or physical), a sensory impairment, are old and frail, or have some other form of illness. For the purpose of practice and, in as far as is possible, this document will have equal application to vulnerable adults as to children.

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Near Media Co-op is fully committed to safeguarding the wellbeing of all children and vulnerable adults. In its policies, practices and activities, Near Media Co-op will adhere to the following principles:

Near Media Co-op will:

- ✓ Recognise that the protection and welfare of children and vulnerable adults is of paramount importance, regardless of all other considerations
- ✓ Fully cooperate with the relevant statutory authorities in relation to child and vulnerable adults protection and welfare matters
- ✓ Adopt safe practices to minimise the possibility of harm or accidents to children and vulnerable adults
- ✓ Fully respect confidentiality requirements in dealing with child and vulnerable adults protection matters
- ✓ Commit to provide appropriate training to staff and students in relation to the protection of children and vulnerable adults. All staff and shareholding volunteer members will be made aware of this Policy and Near Media Co-op will promote best practice in safeguarding the wellbeing of children and vulnerable adults.

### ***Criminal Justice (Withholding of Information on offences against Children and Vulnerable Persons) Act 2012.***

The Oireachtas has enacted legislation which places personal responsibility on all individuals to report to the Gardai in respect of information that they become aware of in relation to an offence against a child or a vulnerable person. Below is a brief explanation of this Legislation. The Legislation can be found at: <http://www.irishstatutebook.ie/eli/2012/act/24/enacted/en/html> and all Near Media Co-op staff and shareholding volunteer members are advised to familiarise themselves with it. The essence of the legislation is as follows: It is an offence not to disclose information on serious offences against children where a person:

- knows or believes an offence has been committed; and
- has information that he/she knows or believes might be of material assistance in securing the apprehension, prosecution or conviction of the offender; and,
- fails without reasonable excuse to disclose this to An Garda Síochána Serious Offences are identified as either Schedule 1 or Schedule 2 offences and these Schedule relate either to children (Schedule) 1 or vulnerable persons

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(Schedule 2). Examples of these offences include but are not limited to (this is not the complete list, which can be found in the Legislation):

- Murder
- Manslaughter
- Rape
- Sexual Assault
- Incest
- Trafficking /Pornography re children
- Reckless Endangerment
- Assault causing Harm
- Abduction
- Child Cruelty
- Female Genital Mutilation

It is the personal responsibility of each individual person to comply with the provisions of the Criminal Justice (Withholding of information on offences against children and vulnerable persons) Act 2012. It is important to note that the fact that the Designated Person has made a report to TUSLA and/or An Garda Síochána does not relieve a person of their legal obligation to disclose information to the Gardai under this Act where that person has information that falls within the ambit of the Act

### ***Procedures***

The procedures can be categorised under the following headings:

1. Child-Centred Approach
2. Good Practice
3. Inappropriate Behaviour
4. Physical Contact
5. Health and Safety
6. Reporting Procedures
7. Form of Consent for Working with Children/Young People
8. Further Information and Training

### **Child-Centred Approach**

- Treat all children and young people equally.
- Listen to and respect children and young people.
- Involve children and young people in decision-making, as appropriate.
- Provide encouragement, support and praise (regardless of ability).
- Use appropriate language (physical and verbal).
- Have fun and encourage a positive atmosphere.
- Offer constructive criticism when needed.

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- Treat all children and young people as individuals.
- Respect a child's or young person's personal space.
- Discuss boundaries on behaviour and related sanctions, as appropriate, with children and young people and their primary carers.
- Agree group 'contract' before beginning session.
- Encourage feedback from group.
- Use age-appropriate teaching aids and materials.
- Lead by example.
- Be aware of a child's or young person's other commitments when scheduling rehearsals or activities, e.g., school or exams.
- Be cognisant of a child's or young person's limitations, due to a medical condition for example.
- Create an atmosphere of trust.
- Respect differences of ability, culture, religion, race and sexual orientation.

### **Good Practice**

- Register each child or young person (name, address, phone, special requirements, attendance, emergency contact).
- Make primary carers, children/young people, visitors and facilitators aware of the child protection policy and procedures.
- Have emergency procedures in place and make all staff aware of these procedures.
- Be inclusive of children and young people with special needs.
- Plan and be sufficiently prepared, both mentally and physically.
- Report any concerns to the Designated Person and follow reporting procedures.
- Encourage children and young people to report any bullying, concerns or worries and to be aware of anti-bullying policy
- Observe appropriate dress and behaviour.
- Evaluate work practices on a regular basis.
- Provide appropriate training for staff and shareholding volunteer members.
- Report and record any incidents and accidents.
- Update and review policies and procedures regularly.
- Keep primary carers informed of any issues that concern their children.
- Ensure proper supervision based on adequate ratios according to age, abilities and activities involved.
- Don't be passive in relation to concerns, i.e., don't 'do nothing'.
- Don't let a problem get out of control.
- Avoid taking a session on your own. If this is not possible then it should be in an open environment with the full knowledge and consent of primary carers.
- Avoid if at all possible giving a lift to a child or young person and if you do then make sure that primary carers are informed.
- Maintain awareness around language and comments made. If you think that something you said may have caused offence or upset, then try to address it in a sensitive manner.

## **Inappropriate Behaviour**

- Avoid spending excessive amounts of time alone with children or young people.
- Don't use or allow offensive or sexually suggestive physical and/or verbal language.
- Don't single out a particular child or young person for unfair favouritism, criticism, ridicule, or unwelcome focus or attention.
- Don't allow/engage in inappropriate touching of any form.
- Don't hit or physically chastise children or young people.
- Don't socialise inappropriately with children or young people, e.g., outside of structured organisational activities.

## **Physical Contact**

- Seek the consent of children or young people in relation to physical contact (except in an emergency or a dangerous situation).
- Avoid horseplay or inappropriate touch.

## **Health and Safety**

- Don't leave children unattended or unsupervised.
- Manage any dangerous materials or equipment.
- Provide a safe environment.
- Be aware of accident procedure and follow accordingly.

## ***Vulnerable Adults***

All adults have the right to be safe and to live a life free from abuse. All persons are entitled to this right, regardless of their circumstances. It is the responsibility of all service providers, statutory and non-statutory, to ensure that, service users are treated with respect and dignity, have their welfare promoted and receive support in an environment in which every effort is made to promote welfare and to prevent abuse." ['Safeguarding Vulnerable Persons at Risk of Abuse – National Policy and Procedures'](#).

In December 2014, the HSE launched its safeguarding policy for older persons or persons with a disability that, as a result of physical or intellectual impairment, may be at risk of abuse.

The "*Safeguarding Vulnerable Persons at Risk of Abuse - National Policy and Procedures*", which applies to all HSE and HSE funded services, outlines a number of principles to promote the welfare of vulnerable people and safeguard them from abuse. These include a requirement that all services must have a publicly declared "**No Tolerance**" approach to any form of abuse and must promote a culture which supports this ethos. Near Media Co-op endorses this approach.

All vulnerable people have a right to be protected against abuse and to have any concerns regarding abusive experiences addressed. They have a right to be treated with respect and to feel safe, regardless of the setting in which they live. If anyone

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has a concern about abuse or neglect of a vulnerable person in Near Media Co-op, they should report it to a health care professional (e.g. public health nurse, physiotherapist, GP etc.) or the [Safeguarding and Protection Teams](#) .

## ***Reporting Procedures***

### **Designated Persons**

**Sally Galliana**, Radio Co Ordinator has been **designated** as the **person to contact** if you have an issue or concern about any aspect of a young persons or vulnerable adults safety and welfare. It is the responsibility of this person to support and advise staff about policy and procedures in relation to child protection and to ensure that procedures are followed. It is also the responsibility of the Designated Person to liaise with TUSLA, the Child and Family Agency, the Health Service Executive (HSE) or Gardai where appropriate.

Sally can be contacted at 8671190 or [sally@near.ie](mailto:sally@near.ie)

**Ciaran Murray**, Project Co Ordinator has been **designated** as **deputy** to Sally and can be contacted at 8671190 or [Ciaran@near.ie](mailto:Ciaran@near.ie)

### **Grounds for Concern**

The following excerpt from Children First: National Guidelines for the Protection and Welfare of Children (4.3.2 – p. 38) shows what would constitute reasonable grounds for concern;

- (i) specific indication from the child or young person that s/he has been abused
- (ii) an account by a person who saw the child or young person being abused
- (iii) evidence, such as an injury or behaviour, which is consistent with abuse and unlikely to be caused another way
- (iv) an injury or behaviour which is consistent both with abuse and with an innocent explanation but where there are corroborative indicators supporting the concern that it may be a case of abuse (an example of this would be a pattern of injuries, an implausible explanation, other indications of abuse, dysfunctional behaviour)
- (v) consistent indication, over a period of time, that a child is suffering from emotional or physical neglect.

### **Recording Procedures**



The designated person will be responsible for the collection, safe and confidential storage of all information relating to a child protection referral. A copy of the standard reporting form is available at:

<http://www.tusla.ie/children-first/publications-and-forms>

### ***Dealing with a disclosure/allegation***

It is of utmost importance that disclosures of allegations are managed in a sensitive and discreet manner and any response to a young person making a disclosure should take the following into consideration;

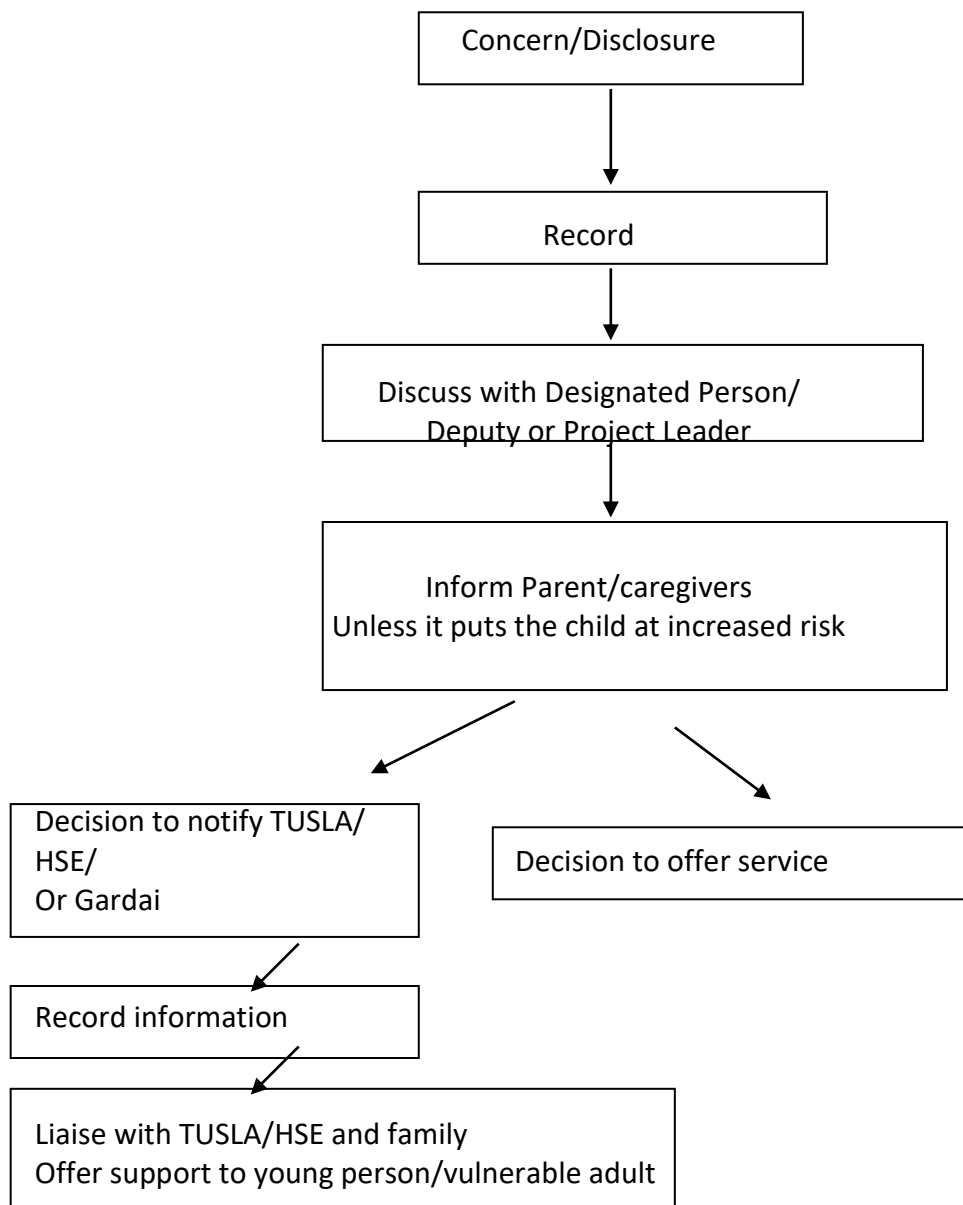
- Take what the young person says earnestly
- React in a calm manner as over reaction may intimidate the young person and increase any feelings of guilt that s/he may have
- Reassure the young person that it was right to tell someone what happened
- Listen carefully and attentively
- Be careful when asking questions. Conversation should be supportive and for the purpose of clarification, allow the person to speak without interruption, accept what is said.
- Alleviate feelings of guilt and isolation, while passing no judgement
- Never ask leading questions. Do not seek intimate details beyond those volunteered by the young person. Such questions and suggestions could complicate the official assessment/investigation by the statutory authorities
- Do not express any opinion about the alleged abuser to the person reporting to you
- Do not confront the alleged abuser
- Write down immediately after the conversation what was said, including where, when and other significant factors noting marks and signs observed. All reports should be signed and dated by the person recording the event
- Check with the young person to ensure what has been heard and understood accords with what they actually said
- Make no promises that cannot be kept, so not promise to keep secret what will be revealed
- Advise that you will offer support, but that you must pass on the information; ensure that the young person understands what will happen next.
- Explain and make sure that the young person understands what will happen next.

Clarify the information is being recorded and referred. Ensure that it is confined and treated as strictly confidential, to be shared with only those

## Reporting Procedures

If staff or shareholding volunteer members have a child protection concern where they suspect a young person is being abused or neglected or a young person discloses an alleged abuse or neglect to them they should follow the steps outlined below.

1. Record concern or disclosure
2. Ensure in as far as is possible that no situation arises which could cause further concern
3. Immediately inform the Designated Person or if unavailable the Deputy Designated Person
4. The most appropriate person should discuss the concern or consult the parents/primary care givers. Parents/primary care givers or responsible adults should be made aware of a report to TUSLA or HSE unless it is likely to put the young person at further risk.
5. The Designated Person may contact the TUSLA or HSE duty social work department for an informal consultation prior to making a report
6. Information will be shared strictly on a need to know basis.
7. If there are reasonable grounds for concern the Designated Person will contact the Duty Social Worker in TUSLA, or the HSE area using the standard reporting form available. Reports to the Duty Social Worker can be made verbally initially and then followed by the standard reporting form. Reports should be made to TUSLA/ HSE without delay.
8. The Designated Person will keep a record of all telephone calls and reports in relation to the notification to the health board
9. In case of emergencies outside of the TUSLA/HSE social work department hours contact the Gardai. In situations that threaten the immediate safety of a young person it may be necessary to contact the Gardai.



**Form of Consent for Working with Children/Young People/Vulnerable Adult**



**To Parent/Guardian:**

Date: .....

Time: .....

Place: .....

Details: .....

In order for your child, young person or vulnerable adult to take part in this event can you please fill in the consent form below and return it ASAP to:-

.....,  
(Name of organiser)  
Near Media Co-op,  
Northside Civic Centre,  
Bunratty Road, Coolock, Dublin 17.

If you have any queries you can contact me on 8671190 or .....

✂ .....

To Near Media Co-op

Name of Child/Young Person/vulnerable adult:..... has  
permission to attend

.....

on.....

at .....

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Signature of Parent/Guardian:.....

Contact Phone No:.....

### ***Further Information and Training***

Guidelines published by the Department of Children and Youth Affairs are contained in the document :

<https://www.dcy.gov.ie/viewdoc.asp?fn=/documents/Publications/ChildrenFirst.pdf>

Training courses are as follows:-

- National Youth Council of Ireland <http://www.childprotection.ie/training>
- <http://www.tusla.ie/children-first/roles-and-responsibilities/organisations/children-first-training>
- <https://www.barnardos.ie/what-we-do/training/training-events.html>

Further information also available at [www.hse.ie](http://www.hse.ie) [www.tusla.ie](http://www.tusla.ie) [www.dcy.gov.ie](http://www.dcy.gov.ie)

### ***Garda Vetting Policy***

It is Near Media Co-op policy to ensure that all staff or shareholding volunteer members who work with children or vulnerable adults are garda vetted. It is Near Media Co-ops understanding that it is not a relevant organisation, within the meaning of the National Vetting Bureau (Children and Vulnerable Persons) Acts

A relevant organisation means a person (including a body corporate or an unincorporated body of persons) who employs, enters into a contract for services or permits any person to undertake relevant work or activities, a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable persons. The Act shall not apply to persons who assist on an occasional basis and for no commercial consideration. This would include persons who assist on an occasional basis at a school, sports or community event or activity other than where such assistance includes the coaching, mentoring, counselling, teaching or training of children or vulnerable persons.

In practice, no staff shareholding volunteer member or shareholding volunteer member works alone with children and/or vulnerable adults. In addition, one shareholding volunteer member of any team working with children/vulnerable adults will always be garda vetted. Where Near staff, shareholding volunteer Near Media Co-Op Operations and Procedures Handbook Part 2 Policies – Last reviewed February 2023

members or external contractors are involved in a Near project or activity that involves working with children or vulnerable adults, it is the policy of Near Media Co-op that they are garda vetted. Near Media Co-op has a Service Level Agreement with Fingal Shareholding volunteer member Centre who are a registered organisation for garda vetting purposes. Applications should be made through The Secretary (Sabrina@near.ie)

It is the policy of Near Media Co-op to review the status of an individual's garda vetting after a period of five years.

## **NEAR MEDIA CO-OP PROTECTED DISCLOSURES POLICY**

### ***Information about the Policy***

#### **Legal Basis for having a Protected Disclosures Policy:**

Protected Disclosures Act 2014 (PDA)

The PDA places a requirement on every public body to establish and maintain procedures for the making of protected disclosures by workers who are, or were employed, by the public body and for dealing with such disclosures.

#### ***What is a Protected Disclosure:***

A protected disclosure is a disclosure of information which, in the reasonable belief of the worker, tends to show one or more relevant wrongdoings;  
came to the attention of the worker in connection with the worker's employment;  
and is disclosed in the manner prescribed in the Act.

A protected disclosure should contain "information" which tends to show wrongdoing. The ordinary meaning of disclosing "information" is conveying facts, such as stating that particular events have occurred. This is different to simply making an allegation on the basis of a suspicion that is not founded on anything tangible.

#### ***What is a Relevant Wrongdoing:***

Committing an offence;

The failure to comply with a legal obligation;

A miscarriage of justice;

Danger to health and safety of an individual;

Damage to the environment;

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The unlawful or improper use of public funds or resources;

An act or omission of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement;

and

The concealment or destruction of information evidencing any of the above matters or the likelihood of any of the above matters occurring.

The Relevant Wrongdoing may have already taken place, be happening or be likely to happen.

***What is not a Relevant Wrongdoing:***

A failure to comply with obligations arising under the worker's contract of employment, e.g., a failure to pay an employee overtime where provided for in the employee's contract of employment;

Grievances concerning the worker's contract of employment and /or duties in employment or concerning work relations with another individual or that fall within the scope of a grievance procedure applicable to the worker; Matters falling within the scope of Near Media Co-op's complaints, disciplinary procedures, and / or other internal employment policies and procedures.

***Who is a Worker (as far as Near Media Co-op is concerned):***

All current and former employees (including permanent, temporary, fixed-term, casual and substitute);

Contractors and consultants engaged to carry out work or services for Near Media Co-op;

Individuals on work experience pursuant to a training course and trainees of/with the Near Media Co-op

Shareholding volunteer members

***What is a Stepped Disclosure System:***

The PDA provides for a stepped disclosure process with separate & increasingly onerous requirements, depending on the recipient of the disclosure.

The process is designed to encourage workers to make disclosures to their employer in the first instance, to specified third parties in certain other circumstances and to make the disclosure of information to the public as a last resort.

In the first instance, disclosure should be made orally or in writing to Near Media Co-op Project Co-Ordinator.

Where the disclosure involves the Project Co-ordinator, the worker should make the disclosure in writing to the Secretary of the Committee of Management.

The worker can make an external disclosure to prescribed persons as set out in S.I. 339/2014 – Protected Disclosures Act 2014

Workers must comply with the disclosure process provided in the PDA in order for the disclosure to be classified as a “protected disclosure” and for the worker to qualify for protections under the PDA.

## **1 INTRODUCTION & SCOPE:**

1.1 Near Media Co-op is committed to creating a workplace culture that encourages the making of protected disclosures and provides protection for disclosers.

1.2 This policy will allow workers to make disclosures without fear of penalisation or threat of less favourable treatment, discrimination or disadvantage.

1.3 All disclosures of wrongdoing in the Co-op shall, as a matter of routine, be the subject of an appropriate assessment and / or investigation and the identity of the discloser shall be adequately protected.

1.4 Overall responsibility for this Policy rests with the Committee of Management of the Co-op.

1.5 The day-to-day responsibility for this Policy is delegated to the Project Co-ordinator

1.6 Near Media Co-op considers that the most appropriate way to deal with disclosures of information relating to wrongdoing is at local level within Near FM/NearTV, however, it does recognise that there may be circumstances where this is not appropriate.

1.7 This Policy does not replace legal reporting and disclosure requirements under other legislation, e.g. child protection reporting obligations.

1.8 This Policy does not replace Near Media Co-op’s normal day-to-day operational reporting or its existing policies and procedures relating to grievances, bullying, harassment, disciplinary, dignity at work and other complaints.

## **2 DISCLOSURE OF INFORMATION**

2.1 This is different to simply making an allegation regarding a relevant wrongdoing, for example, claiming that an individual’s health and safety has been endangered. Disclosing information involves providing some details and particulars.

2.2 Workers are not required or entitled to investigate matters themselves to find proof of their suspicion and should not endeavour to do so. All workers need to do, and should do, is disclose the information that they have, based on a reasonable belief that it discloses a wrongdoing and, where the information relates to individuals, that it is necessary to disclose that information.

2.3 The information must come to the attention of the worker in connection with his / her employment.



### **3 REASONABLE BELIEF**

3.1 A worker must have a reasonable belief that the information disclosed shows, or tends to show, wrongdoing. The term “reasonable belief” does not mean that the belief has to be correct. Workers are entitled to be mistaken in their belief, so long as their belief was based on reasonable grounds.

3.2 No worker will be penalised simply for getting it wrong, so long as the worker had a reasonable belief that the information disclosed showed, or tended to show, wrongdoing.

### **4 PROTECTION AND SAFEGUARDS**

4.1 This Policy protects workers from penalisation for making a disclosure of information which the worker reasonably believes or suspects is a relevant wrongdoing.

4.2 Penalisation means any act or omission that affects a worker to the worker’s detriment, and in particular includes:

- o Suspension, lay-off or dismissal;
- o Demotion or loss of opportunity for promotion;
- o Transfer of duties, change of location of place of work, reduction in wages or change in working hours;
- o The imposition or administering of any discipline, reprimand or other penalty;
- o Unfair treatment;
- o Coercion, intimidation or harassment;
- o Discrimination, disadvantage or unfair treatment;
- o Injury, damage or loss, or
- o Threat of reprisal.

4.3 Penalisation by any person, including workers, management, shareholding volunteer members of the Committee of Management will not be tolerated. Any person who threatens to penalise or penalises a worker for making a disclosure pursuant to this policy will be subject to disciplinary action.

4.4 The protection from penalisation applies even if the disclosure is not subsequently confirmed or upheld as well-founded.

4.5 If an employee of Near Media Co-op experiences penalisation he / she should notify management and the matter will be assessed / investigated and appropriate action taken where necessary.

### **5 CONFIDENTIALITY**

5.1 Near Media Co-op is committed to protecting the identity of the worker making a protected disclosure and ensuring that protected disclosures are treated in confidence.

5.2 However, there are circumstances, as outlined in the 2014 Act, where confidentiality cannot be maintained, for example, where the Discloser makes it clear that he/ she has no objection to his or her identity being disclosed and/or the identity of the Discloser is critical to an investigation of the matter raised.

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5.3 If it is decided that confidentiality cannot be maintained in the context of an investigation, Near Media Co-op will inform the Discloser in advance that his /her identity will be disclosed. The Discloser may request a review of this decision and a review will be carried out, where practicable.

## **6 ANONYMOUS DISCLOSURES**

6.1 Where the worker withholds their identity in making a disclosure it is more difficult to assess the disclosure and take appropriate action.

6.2 Near Media Co-op will act upon the disclosure to the extent that this is possible, but may be restricted in their ability to investigate the matter in the absence of the knowledge of the identity of the discloser.

6.3 Important elements of the Policy & Procedures will be difficult or impossible to apply unless the worker's anonymity lifts. E.g. Keeping the discloser informed and protecting a discloser from penalisation.

## **7 PROCEDURE FOR MAKING A PROTECTED DISCLOSURE**

### **7.1 Who should the Discloser make the disclosure to?**

7.1.1 In the first instance, disclosures should be made orally or in writing to the Project Co-ordinator. Where the disclosure is made orally, the Project Co-ordinator shall take a note recording the disclosure in consultation with the Discloser.

7.1.2 Where the disclosure involves the Project Co-ordinator, the Discloser should make the disclosure in writing to the Secretary of the Committee of Management.

7.1.3 A person to whom a disclosure is made must take reasonable steps to protect the identity of the Discloser.

7.1.4 A written disclosure should be made on the Notification Form attached.

### **7.2 Assessment Meeting**

7.2.1 The Recipient will arrange to meet with the Discloser within **[10]** working days of receipt of the disclosure to discuss it on a strictly confidential basis. The Recipient will need to clarify at this point if the disclosure is appropriate to the Policy or is a personal employment complaint more appropriate to other Co-op procedures, for example a Grievance Procedure.

7.2.2 The Discloser may be accompanied at this meeting by a trade union representative or a work colleague from the Co-op. the meeting will be private and confidential and its purpose is twofold:

(a) So that the Recipient is satisfied the disclosure made falls within the scope of this policy and not some other internal policy, and

(b) So that the Recipient can determine the appropriate course of action in response to the disclosure made.

7.2.3 If the Recipient is unclear whether the disclosure qualifies as a protected disclosure, it will be treated as such and pursuant to this Policy until such time as it is deemed not to constitute a protected disclosure.

7.2.4 The course of action, as determined by the recipient, will take one of the following forms:

(a) Meetings between the Recipient and Discloser to clarify matters and/or agree an outcome, **and/or**

(b) An investigation by the Project Co-ordinator, **or**

(c) An investigation by the Secretary/Chairperson / a Sub-Committee of the Committee of Management, **or**

(d) An investigation approved by the Committee of Management to be carried out by an independent third party.

7.2.5 It is the general intention of this Policy that the recipient will communicate with the Discloser in writing within **[10]** Near Media Co-op days of the Assessment Meeting taking place to formally acknowledge receipt of the disclosure made and to advise the outcome of the Assessment Meeting.

7.2.6 If it appears to the Recipient that the disclosure made falls to be more properly addressed under another process or within the scope of another internal Near Media Co-op policy and procedure, the recipient will communicate this to the Discloser.

7.2.7 The Discloser may seek a review of the outcome of the Assessment Meeting. The review will be undertaken by a person who was not involved in the Assessment Meeting.

7.2.8 Disclosures may, in light of the nature and /or seriousness of the matters raised, be referred immediately to the appropriate authorities. For example, if the disclosure relates to criminal activity, the recipient will refer the matter immediately to An Garda Síochana.

### **7.3 Investigation**

7.3.1 Where an investigation is undertaken, the Discloser's involvement in that investigation will depend on the subject matter of the disclosure made and the detail provided by the Discloser.

7.3.2 The investigation will be conducted in a full, fair and objective manner with regard to the Principles of natural justice and fair procedures. Its format and who assists and/or is involved in the investigation will be determined by the Investigator(s) by reference to the subject matter of the disclosure made. Where the information disclosed relates to alleged wrongdoing on the part of an individual, the principles of natural justice and fair procedures will be complied with vis-à-vis that individual, as appropriate.

7.3.3 The Investigator(s) may deem it necessary to meet with the Discloser in the course of the investigation and in such circumstances the Discloser may be accompanied by a trade union representative or work colleague from the Near Media Co-op.

7.3.4 In any event, the objective is that the investigation will be undertaken promptly and efficiently. Having regard to the duration and nature of the investigation, it may be appropriate to inform the Discloser in writing of the investigation's progress and likely timeframe for its conclusion. However, it is important to note that sometimes

the need for confidentiality and legal considerations may prevent the Investigator(s) from giving specific details of an investigation.

#### **7.4 Communication**

7.4.1 It is important that the Discloser feels assured that a disclosure made under this Policy is taken seriously and is kept informed of the steps which are being taken in response to the disclosure. In this regard, the Investigator(s) undertake to communicate with the Discloser as follows:

(a) The Recipient will acknowledge receipt of the disclosure and arrange to meet with the Discloser as outlined above;

(b) If an investigation takes place, the Investigator(s) will keep the Discloser informed of actions, where possible, in that regard including the outcome of any investigation. However, in this regard, it is important to note that sometimes the need for confidentiality and legal considerations may prevent the Investigator(s) from giving the Discloser specific details of an investigation.

#### **7.5 Disciplinary Action**

7.5.1 Where a disclosure is made in accordance with this Policy, but the information disclosed is not subsequently upheld by an investigation, no action will be taken against the Discloser who will be protected against any penalisation.

7.5.2 However, a disclosure made in the absence of a reasonable belief will not attract the protections of the 2014 Act and may result in disciplinary action against the Discloser. In addition, disclosure of a wrongdoing does not necessarily confer any protection or immunity on a Discloser in relation to any involvement they may have had in that wrongdoing.

#### **7.6 Records**

All records of disclosures will be securely maintained so as to comply with the requirements for confidentiality under the 2014 Act and data protection obligations.

### **8 MAKING A DISCLOSURE EXTERNALLY**

8.1 The aim of this Policy is to provide workers with an avenue within Near Media Co-op to make disclosures in relation to wrongdoing. The Committee of Management is confident that such issues can be appropriately dealt with “in house” and encourages workers to report such disclosures internally. The Committee acknowledges that there may be circumstances where a worker wishes to make a disclosure externally, and the legislation governing disclosures provides for a number of avenues in this regard.

8.2 It is important to note that while a worker need only have a reasonable belief as to wrongdoing to make a disclosure internally, if the worker is considering making an external disclosure he or she has different and potentially more onerous obligations depending to whom the disclosure is made.

#### 8.2.1 Disclosure to a Prescribed Person (section 7 of the 2014 Act)

S.I. 339 of 2014 prescribes certain external bodies and persons as appropriate recipients of disclosures of relevant wrongdoings falling within their prescribed remit.

It should be noted that a worker disclosing to a prescribed person must **reasonably believe** that the relevant wrongdoing falls within the scope of matters in respect of which the person is the prescribed recipient **and** that the information disclosed, and any allegation contained in it, are **substantially true**. This standard is different from that applying to internal disclosures.

Examples of prescribed recipients of disclosures of relevant wrongdoings under the S.I. are the CEO of the Education and Training Board, INTREO, the Data Protection Commissioner.

#### 8.2.2 Disclosure to a Minister (section 8 of the 2014 Act)

#### 8.2.3 Disclosure to Legal Adviser (section 8 of the 2014 Act)

Where a worker makes a disclosure in the course of obtaining legal advice from a barrister, solicitor, trade union official or official of an excepted body.

#### 8.2.4 Disclosure to other persons outside the workplace (section 10 of the 2014 Act)

Certain criteria and conditions must be fulfilled in order for such a disclosure to be protected and workers are advised to seek Union or other advice/assistance if they are considering making a section 10 protected disclosure.

## REVIEW AND AMENDMENTS

This policy may be reviewed and amendments made and employees and shareholding volunteer members will be informed accordingly.

Signed: ----- Chairperson, Committee of Management.

Dated:-----



## **NEAR MEDIA CO-OP SHAREHOLDING VOLUNTEER MEMBER WARRANTY**

**I, the undersigned agree to:**

**Uphold the ethos and follow the guidelines of Near Media Co-op.**

**When in charge of broadcasting I agree:**

**That anything contravening the libel, slander and defamation laws shall not be broadcast.**

**That anything likely to incite or promote crime or hatred shall not be broadcast.**

**That anything which is sub-joined (prohibited from entering the public**

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**domain by the courts) shall not be broadcast.**

**That anything contravening the libel and defamation laws or breaching the BAI's regulations shall not be broadcast.**

**In case I need to cancel my program I agree to inform the station administrator Alan Braddish , [alan@near.ie](mailto:alan@near.ie) with possibly one week notice so that he can arrange for another shareholding volunteer member to stand in for my program.**

**That the privacy of any individual shall not be unreasonably encroached upon.**

**I will promote the good name of Near Media Co-op, and not knowingly do anything to damage Near's reputation.**



Name \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## PROGRAMME AGREEMENT

Between **xy** and the Programming Committee of Near FM

Re: xyz title of programme

Transmission Details: x day, every week, 5.00-6.00pm

Start date: x day, weekly, for three month initially.

### **Programme Details:**

**Type:** magazine/ panel **Content:** talk

It is a programme focusing on xyz

### **Shareholding volunteer member Obligations and Quality of Programming:**

The Shareholding volunteer member(s) agrees to adhere to Near FM's Broadcasting Regulations and Standards.

### **Duration of agreement: Date**

This agreement will remain valid for the period defined above. The committee will review the programme prior to the end of the agreement period. If the Programming Committee wishes to continue broadcasting this programme it will either draw up another agreement based on the review or will issue a continuance of this agreement for a further period. The committee undertakes to involve the Shareholding volunteer member applicant(s) in all stages of the review. The Programming may issue a continuance directly and waive the review.

Sometimes Near FM broadcasts live from outside the studio. This would require to cancel a programme. We give 8 days in advance so that you are aware that we are cancelling your programme for the OB.

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We encourage new shareholding volunteer members to sit to shadow an existing programme. Would it be ok with you for a new shareholding volunteer member to shadow you if your programme/time would be of interest to someone new?

Yes .... No ...

I agree that the programme will conform to the details above and I agree to be bound by the following agreement.

Date:

Signed \_\_\_\_\_

Signed \_\_\_\_\_

On behalf of the Programming Committee

*Information in this handbook is correct as of April 2018*