

CONFLICT OF INTEREST – EXTERNAL WORK REQUEST GUIDELINES

Responsible:	People & Culture – Head of Employee Relations
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Related Policy:	Conflict of Interest Policy

PURPOSE OF THESE GUIDELINES

This is a guide on how employees who wish to undertake external work can satisfy their obligations to disclose and effectively manage conflict of interests in accordance with the ABC's Conflict of Interest Policy.

Employees who are considering undertaking external work must ensure that they are fully aware of and understand their obligations as outlined in this Guideline. Failure to comply with this Guideline constitutes a breach of the Conflict of Interest Policy.

It is critical to uphold the integrity, independence, impartiality and high standards of the ABC by ensuring effective management of conflicts of interest including the undertaking of external work.

WHO THESE GUIDELINES APPLY TO

These guidelines apply to all ABC employees.

EXTERNAL WORK DEFINITION

- External work is employment or the conduct of a business, trade or profession that an employee undertakes for another business, organisation or for themselves.
- External work can be paid or unpaid.
- Employees are responsible at all times for managing any actual, potential or
 perceived conflict of interest that exists between their external work and their
 employment by the ABC or the ABC's editorial independence and ensuring that such a
 conflict is immediately notified to their manager.

APPROVAL AND DISCLOSURE

In addition to the general disclosure procedures outlined in Conflict of Interest Policy, employees who wish to undertake external work must obtain prior written approval from the relevant Divisional Director(s) (or another appropriate person who holds a position which has the necessary delegation) before undertaking or engaging in any external work.

This should be done by completing the External Work Approval Form.

Employees should be aware that conflict of interest is one of several factors that will be taken into account when considering a request for external work approval. If there is any doubt about whether the external work may create an actual, potential or perceived conflict of interest, the matter must be referred up to the next most senior person for advice or decision.

Employees need to obtain approval for external work regardless of whether or not the external work will be undertaken whilst the employee is on leave.

At the time of seeking approval for external work, the employee must disclose whether or not the external work will be paid.

Any employee who has engaged in external work and has not obtained the required approval prior to the commencement of the Conflict of Interest Policy must do so as soon as practicable

VOLUNTARY OR CHARITY WORK

The ABC does not wish to unnecessarily intrude upon or restrict its workers' personal lives and social activities and understands that some may wish to volunteer their services to charitable or other community based organisations. However, given the reputation of the ABC within the community and the important role it plays in Australian life, it's important that even when undertaking voluntary or charitable work that this does not create a conflict of interest or damage the ABC's reputation.

On this basis prior approval is not required to undertake voluntary or charitable work where there is no actual, potential or perceived conflict of interest.

Employees must always ensure, when undertaking voluntary or charitable work that no actual, potential or perceived conflict arises. If a conflict does arise then it must be immediately referred in writing to their manager, prior to undertaking or continuing that work.

CONSIDERATION OF REQUESTS

In considering requests to undertake external work, the delegate must be confident that the outside work will not result in an actual, potential or perceived conflict of interest or adversely affect the employee's employment with the ABC.

Approval for external work will not be unreasonably withheld. Where an employee believes that approval has been unreasonably withheld the normal referral upward mechanisms apply and the issue can also be raised via the Workplace Behaviour Policy.

ACCEPTANCE OF GIFTS AND HOSPITALITY

If there are any free and/or discounted services or products provided to ABC employees undertaking external work the approval process detailed in guidance on <u>Gifts and Hospitality</u> must be followed.

COPYRIGHT

Any approval for external work shall not be taken to waive ABC Copyright. If any external work involves use of ABC copyright material, it must be subject to a separate written application to the relevant Director or nominated delegate.

CONSEQUENCES OF BREACH

Breaches of this guideline will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment.