



# CONFLICT OF INTEREST – EXTERNAL WORK REQUEST GUIDELINES

Responsible:	People & Culture – Head of Employee Relations
Last Updated:	Aug 2021
Related Policy:	<a href="#">Conflict of Interest Policy</a>

## 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 [Gifts and Hospitality](#) 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.



## CONFLICT OF INTEREST – DISCLOSURE PROCEDURES

Organisation:	Australian Broadcasting Corporation
Responsible:	Head Employee Relations, People & Culture
Last Updated:	23 Jan 2023
Related Policy:	<a href="#">Conflict of Interest Policy</a>

### PURPOSE OF THESE GUIDELINES

The ABC strongly encourages an open environment of disclosure and transparency. Employees should be sensitive to potential conflicts of interest and routinely assess the compatibility of their duties as an employee of the ABC with their private interests to ensure compliance with the Conflict of Interest Policy.

If circumstances arise that could be viewed as creating a conflict of interest, it is important that employees seek direction from their manager, and/or delegate, at the earliest possible time. Potential conflicts are most effectively dealt with proactively.

This guideline outlines a procedure that ABC must follow where there is a real, perceived, or potential conflict of interest identified.

### WHO THESE GUIDELINES APPLY TO

All ABC workers defined as:

“Any person who carries out work in any capacity for the ABC, including work as: an employee; a contractor or subcontractor; an employee of a contractor or subcontractor; an employee of a labour hire company who has been assigned to work at the ABC; an outworker; an apprentice or trainee; a student gaining work experience; or a volunteer.”

### DISCLOSURE PROCEDURE

Where a real, perceived or potential conflict of interest is identified the following procedures apply:

1. The employee must declare to their manager, and/or delegate, at the earliest opportunity any real, perceived or potential conflict of interest, and where reasonable, take immediate action to address the conflict;
2. The manager will determine the most appropriate course of action. This may include escalating the issue to the Divisional Director level if they believe it is appropriate or necessary to determine the most appropriate course of action;
3. All conflict of interest situations will be managed on a case by case basis. To determine the most appropriate course of action, consideration may be given to (but not limited to):
  - (a) Will the personal interest damage the integrity of the ABC?
  - (b) Will the personal interest damage the ability of the individual to do their job?
  - (c) What is the nature of the role and/or the program?
  - (d) What is the nature of the private interest; and

- (e) Could this damage either the audience's perception of the editorial integrity of the program or other stakeholders' perceptions of the integrity or impartiality of the ABC if the private interest were discovered?
4. Possible courses of action following the disclosure may include (but are not limited to):
- (a) the approval or rejection of a proposed activity by the relevant delegate, for example, outside work;
  - (b) that the individual should not work on particular stories or programs or in particular areas related to the private interest. The individual should not be involved in the particular decision or transaction related to the private interest;
  - (c) that the gift or offer of hospitality be declined;
  - (d) that a public disclosure of the private interest should be broadcast or published online. If a disclosure is broadcast or published, care must be taken to ensure it could not be construed as endorsing or promoting an entity with whom the individual has declared an association or interest;
  - (e) that the employee address and/or remove the conflict of interest; or
  - (f) that no further action is required.

A record of the request and the decision should be kept by the person who makes the decision and a copy kept by the relevant Director and, where it applies to a Director, by the Managing Director.

## **CONFIDENTIALITY**

Disclosures regarding a conflict of interest may include personal, sensitive or otherwise confidential information and disclosures must at all times be treated with discretion and respect.

The collection and retention of personal information disclosed in accordance with this policy will adopt best practice data protection principles consistent with the Privacy Act 1988.

## **CONSEQUENCES OF BREACH**

Breaches of this Guideline will be dealt with in accordance with the relevant enterprise agreement and may lead to disciplinary action. Repeated failures to follow this Guideline, such as failing to provide notification of absences or supporting documentation, may result in termination of employment.

## **OTHER RELEVANT PROCEDURES AND GUIDELINES**

[External Work Guideline](#)  
[Political Public Office Guideline](#)  
[Entertainment Guideline](#)  
[Gifts and Hospitality Guideline](#)

# ABC Policy - Conflict of Interest

## PRINCIPLES

The ABC's status as the national public broadcaster and the expectations of public accountability and integrity mean that it is important that the ABC and its workers uphold the integrity, independence, impartiality and high standards of the ABC by ensuring effective management of conflicts of interest. A conflict of interest occurs where a worker's non-ABC interest, such as a commercial, personal or political activity, competes with their ABC interest.

A reference to "conflict of interest" includes an actual, potential or perceived conflict of interest. This is because potential and perceived conflicts of interest can be as detrimental to the ABC as an actual conflict.

For those workers involved in content making, this policy is to be read in conjunction with the Editorial Policies. The Editorial Policies prevail to the extent of any inconsistency.

## WHO AND WHEN

This policy applies to all ABC employees, contractors and subcontractors, work experience students, interns and all ABC volunteers (Workers).

## STANDARDS

A Worker must:

1. Immediately take any reasonable steps to avoid or, where this is not reasonably practicable, to minimise the conflict of interest between their personal interests and their work at the ABC;
2. at the earliest opportunity, disclose any conflict of interest to their manager;
3. if necessary at any time during their employment or engagement, complete a [Public Duty/Private Interest Statement](#) or External Work Request form honestly and accurately. If their circumstances change, they must notify their manager at the earliest opportunity, and complete an updated Statement or Request form.

The above standards apply to all conflicts of interest, including (but not limited to) external work, standing for or holding public office, close personal relationships, gifts and benefits, use of social media, public statements (including to the media), supply of goods and services, and financial interests.

## CONSEQUENCE OF BREACH

Breaches of these standards may lead to disciplinary action including possible termination of employment.

A breach of this policy may also be a breach of the *Public Governance, Performance and Accountability Act 2013 (Cth)*. For contractors who are found to have breached this policy, there may be consequences including termination or non-renewal of contract.

## ACCOUNTABILITY

Chief People Officer

## RELEVANT PROCEDURES & GUIDELINES

[External Work Guideline](#)

[Political Public Office Guideline](#)

[Entertainment Procedure](#)

[Gifts and Hospitality Guideline](#)

[Disclosure Procedures](#)

[External Work and Editorial Conflicts Guidance Note](#)

[Public Duty- Private Interest Statement Guidance Note](#)

[External Work Form/Public Duty - Private Interest Statement Form Processes](#)

[Information for Independent Producers and Talent](#)

DOCUMENT HISTORY:

- Reviewed 2023 (Endorsed by PSC 10 May 2023; Approved by ABC Board 9 June 2023).
- Reviewed 2020 (Endorsed by ABC Board 26 Aug 2020; Approved by Executive 23 July 2020)
- Updated 2014 (Policy updated July 2014 to refer to the PGPA Act)
- Reviewed 2014 (Endorsed by PRG 29 Apr 2014; Approved by Executive 9 May 2014)
- Reviewed 2011 (Endorsed by PRG 16 Mar 2011; Approved by OSG 24 Mar 2011)

# GUIDANCE NOTES

## PUBLIC DUTY-PRIVATE INTEREST STATEMENT

Last Updated:	July 2024
Related Policy:	<a href="#">Conflict of Interest Policy</a>

These guidance notes are intended to assist employees complete the Public Duty – Private Interest Statement form (**Statement**) and to raise awareness of employees' obligations. These guidance notes supplement the Conflict of Interest Policy and the Disclosure Procedures.

### Overview

All ABC employees need to be sensitive to the potential for a real or perceived conflict of interest between their private interests and their professional obligations. You must regularly assess whether your private interests (or those of your family, friends or associates) may influence, or appear to influence, the performance of your work or may adversely impact the ABC's operations or reputation.

All ABC employees must conduct themselves in a transparent manner by proactively disclosing any real, perceived or potential conflict of interest.

Conflicts of interest are an inevitable part of organisational life and can arise intentionally or inadvertently. Your activities (including, without limitation, any personal, financial and political relationships) must not compromise the accountability, integrity, independence or impartiality of the ABC.

As an ABC employee you must remain constantly aware of this issue and take appropriate steps to effectively manage the risks associated with any real, perceived or potential conflict.

### What constitutes a conflict of interest?

What constitutes a conflict of interest may vary on a case by case basis and, of course, depends on the nature of your role and responsibilities with the ABC.

In some cases a conflict might be immediately apparent and in others cases, it may be more subtle. Therefore you should consider the principles below and whether you (or your family, friends and associates) hold any external interests that could potentially compromise these principles.

You must:

1. Uphold the ABC's independence, integrity and high standards.
2. Understand the requirements of your role, your broader duties as an employee of the ABC and the role of the ABC.

3. Carry out your duties in a careful and competent manner, to the best of your skill and ability, and in the best interests of the ABC.
4. Ensure legitimate use of your position, time and the ABC's confidential information and resources.
5. Disclose any conflict of interest.
6. Make decisions fairly and on proper grounds.

## **Materiality**

To assist in ascertaining whether an interest would amount to a real or potential conflict, you may need to consider the materiality of the interest.

When completing the Statement, you will need to consider your personal circumstances and your position with the ABC and then apply a degree of common sense as to whether an interest may have any material bearing on your day to day activities at the ABC.

If you are aware that there may be a perception by others that you have a conflict of interest, it is equally important to disclose this and discuss the issue with your manager.

Here are some general examples to assist you in thinking about materiality and when you should disclose an interest to your manager:

- If you are involved with the negotiation of a contract on behalf of the ABC and you have a relationship with the other party to the negotiations which is not entirely independent (e.g. the other party is a family member or friend).
- If you are involved in making a decision (or able to influence the decision maker) about a potential supplier of goods or services to the ABC and you (or a family member or friend) hold an interest in the company that is offering to supply the goods or services.
- If the ABC is acquiring or leasing property and you (or a family member or friend) are the owner of the property being considered for purchase or lease.
- If you (or a family member or friend) own intellectual property in a program, script, image, domain name or other intellectual property which the ABC is considering licensing and you are part of the decision making process as to whether the ABC should acquire that property.
- If you are participating in ABC negotiations with a supplier and that supplier also wishes to commence discussions with you concerning your prospective employment.
- If you (or a family member or friend) hold an interest in a business which is likely to offer or supply the ABC with goods, services or real or personal property (including intellectual property).
- If you are a journalist and hold any financial interest or official position with any organisation or political association which may be relevant to the editorial content you are producing. Please note that the ABC's Editorial Policies are also relevant to the disclosure of conflict of interests and the production and use of ABC content.

## **Completing and updating the Statement**

Please be aware that the questions included in the Statement form are not exhaustive and are only relevant at a point in time.



It is your duty and obligation as part of your employment with the ABC to provide as much information as appropriate having regard to your position, the spirit and intention of the Conflict of Interest Policy, the Disclosure Procedures and these Guidance Notes.

You are also required to continue to disclose information to your manager as your personal circumstances or work duties change, and as otherwise required by the ABC from time to time.

You should discuss any areas of uncertainty with your manager.

### **What will the ABC do with the information you disclose?**

Once completed, the Statement will be provided to your manager, who will assess whether the matters disclosed have any operational impact or require any changes to your role and responsibilities.

For example, your manager might ask that you not work on particular negotiations, projects, stories or activities that relate to your outside association or interest or that your disclosure be broadcast or published online.

If your disclosure is broadcast or published, care should be taken that it cannot be construed as promoting an entity with which you have declared an association or interest.

In accordance with the Conflict of Interest Policy, you will not be permitted to exercise any authority or delegation to enter into any transaction which would result in you, your family, friends or associates deriving (either directly or indirectly) any payment, benefit, consideration, opportunity or reward unless you have disclosed the circumstances giving rise to the benefit and the transaction has been approved by your manager.

Your manager will record details of their assessment and actions that are agreed to be undertaken to address the matters disclosed. You will be asked to confirm your acknowledgement of these agreed actions.

The Statement (and details of any actions agreed) will form part of your personnel file.



## Editorial Policies

---

# External work and editorial conflicts

## What is this guidance note about?

In accordance with the ABC's [Conflict of Interest Policy](#) and [External Work Guidelines](#) *[internal links for ABC staff only]*, ABC workers must obtain prior written approval before undertaking any external work. The ABC will only approve external work requests where it is satisfied there is no risk of a conflict of interest, or steps are taken to appropriately mitigate the risk of a conflict. Conflicts of interest relating to editorial content are of particular concern.

This note provides specific guidance on the editorial impact of paid and unpaid external work carried out by anyone involved in creating content for the ABC.

It does not cover non-editorial conflicts of interest associated with external work, or other editorial conflicts not associated with external work. Workers seeking information about these should have regard to the Conflict of Interest Policy and Editorial Policies respectively.

## Who is covered by this guidance note?

This note relates to anyone involved in producing or contributing to ABC content, including contractors, freelancers and people working for external production companies. Clearly, not all of those categories will be treated the same, and decisions must be made on a case-by-case basis. Outside contributors who work occasionally or intermittently for the ABC will have a wide range of external commitments which can usually be easily managed. The more someone is seen as representing the ABC and its values, the higher the risks involved. Potential editorial conflicts must be referred to your manager, or (for external parties) to the commissioning producer or ABC manager you are working with.

The note should be read and understood by anyone seeking to undertake external work; anyone in a position to approve or reject external work requests; and anyone involved in contracts which restrict or allow external work.

## Which editorial standards are relevant?

The guidance in this note assists in interpreting and applying the following standards in [section 1 of the Editorial Policies](#):

**1.3** Ensure that editorial decisions are not improperly influenced by political, sectional, commercial or personal interests.

**1.4** External activities of individuals undertaking work for the ABC must not undermine the independence and integrity of the ABC's editorial content.

## What is external work?

For the purposes of this guidance note, external work is any work, **paid** or **unpaid**, conducted for other organisations or on a self-employed basis. Examples include:

- Any work for a company, organisation or government agency;
- Writing a book;
- Delivering a speech (excluding, of course, personal speeches on social or family occasions);
- Moderating or participating in a panel discussion;
- Acting as MC (Master of Ceremonies) for an event;
- Creating editorial content for another organisation, including news, opinion articles, or social media content;
- Involvement in a company or organisation as a board member, patron, ambassador, etc;
- Making official comment on behalf of a company or organisation on any public platform;
- Voluntary or charity work.

## What are editorial conflicts of interest?

A **conflict of interest** is where your non-ABC interest, such as a commercial, personal or political activity, competes with your ABC interest, i.e. your ABC work.

There are several types of conflict of interest associated with external work. A **real conflict of interest** is when the performance of your ABC work and work outside the ABC come into direct conflict. A **potential conflict of interest** is where the performance of your ABC work and work outside the ABC could come into conflict in the future, or through a likely change of circumstances. A **perceived conflict of interest** is where there is a perception by others that there is, or could be, a conflict of interest between your ABC work and your external work.

**Editorial conflicts of interest** are those which have a real, potential or perceived impact on editorial content or decisions. They pose serious risks to the ABC and its reputation.

## Why do they matter?

The trust and respect of the community depend on the ABC's commitment to editorial independence and integrity. Editorial conflicts of interest associated with external work have the potential to significantly damage this trust.

Audiences rightly expect the ABC and its workers to make independent editorial decisions, without improper influence from outside interests. They expect ABC content to adhere to the highest standards of integrity, and ABC workers to demonstrate professional integrity. If not properly managed, editorial conflicts can undermine a worker's perceived integrity, the integrity of the content they contribute to, and perceptions of the ABC's editorial independence.

For example, if a journalist reports on calls to tighten bail laws for people charged with domestic violence offences, and they are also an ambassador for a domestic violence victim support charity, audiences may wonder if their charity work had any bearing on their approach to the story, and if all editorial decisions were appropriately independent. Or if an entertainment producer moonlights for a talent agency, this would raise questions about talent selection decisions for all ABC programs they produce.

## Who is responsible for managing editorial conflicts of interest?

Workers and managers share responsibility for navigating the risks associated with external work and protecting the ABC's editorial independence and integrity.

### Worker responsibilities

In accordance with the [External Work Guidelines](#), workers are required to obtain prior written approval from the relevant Divisional Director (or their delegate) before undertaking any external work (other than voluntary or charitable work where there is no actual, potential or perceived conflict of interest), using the [External Work Approval Request Form](#).

Before filling out the form, workers should carefully consider all conflict of interest risks that might arise, and what steps can be taken to manage and mitigate those risks. It is a good idea to discuss the potential editorial implications with your manager at this stage, and seek advice from the Editorial Policies team if needed.

When filling out the form, it is important to provide as much detail as possible, addressing each of the risk factors as outlined below. It is better to be upfront about all possible risks, even if you are confident they can be managed easily. This enables your manager to accurately assess the risk level and ensures there are no surprises.

### Manager responsibilities

Managers are responsible for reviewing and endorsing external work requests, and divisional directors are responsible for approving them. Managers should consider all information provided by the worker and undertake the risk assessment process outlined below. They should

keep records of all decisions as they may later be required to explain why a request was approved or rejected. Their primary obligation in assessing each request is to protect the ABC's editorial independence and integrity.

## Shared responsibilities

Once an external work request has been approved, workers and managers are responsible for enacting any agreed mitigation. For ongoing external work, workers and managers should monitor the situation to ascertain if circumstances have changed. The risk level of external work can change over time, such as if an issue becomes more or less contentious within the community, or an organisation becomes embroiled in a scandal.

## How do we decide if an external work request can be approved?

Workers considering applying for external work, and managers considering external work requests, should undertake a risk assessment process to determine the level of editorial risk. This involves taking into consideration several factors, including:

- The role of the worker at the ABC
- The nature of the external work
- Who the external work is for
- Payment or other compensation

These are explained in more detail below, with examples of what would be considered **low**, **medium**, **high**, **very high** and **extremely high risk**.

## The role of the worker at the ABC

This is the first and most important consideration for any external work. The potential for compromising the ABC's editorial independence varies according to the role that person has at the ABC.

A key consideration in this risk category is proximity to the ABC. Risk levels will differ for employees, contractors, actors, presenters, co-producers, and employees/contractors of co-producers. (In some cases, such as actors, the ABC does not seek to restrict outside activities.) Nonetheless, high profile presenters are often seen as faces or voices of the ABC regardless of whether they work directly for us or are contracted to a co-production company.

The duration and permanence of someone's engagement by the ABC is another relevant consideration. Someone presenting a one-off documentary is less likely to be regarded as a representative of the ABC than someone presenting an ongoing weekly or nightly program.

The table below provides a general guide to risk level based on role:

<b>Role of the worker</b>	<b>Risk level</b>
High profile on-air presenters, reporters and editorial leaders	Very high risk
Workers involved full-time in creating, managing, editing, curating or moderating content for factual or news and current affairs programs and platforms	High risk
Regular part-time contributors with an ongoing relationship creating content for the ABC	Medium to high risk
Any other workers who may be involved in editorial decision-making	Medium risk
Occasional contributors and contractors, and other staff not directly involved in content making or editorial decision-making	Low risk

## The nature of the external work

Different types of external work carry different risk levels. A key consideration is whether the work relates to contentious issues; generally speaking, the more contentious the issues, the higher the risk. If the work is political in nature, or involves the creation of editorial content, the risk is higher. Any connection (real or perceived) between the work and the ABC also increases the risk.

The table below provides some examples:

<b>Nature of external work</b>	<b>Risk level</b>
Consulting or advising companies or organisations on media management e.g. media training or preparing publicity material	Extremely high risk
External work that involves expressing a personal opinion on a current contentious political or social debate, or implicitly endorsing a perspective within such a debate	Extremely high risk
External work that relates directly to your work at the ABC, or is likely to relate to your work at the ABC, or is likely to be perceived as such	High risk
Moderating debates and discussions on contentious issues	Medium risk

Nature of external work	Risk level
Journalistic analysis of contentious political or social issues	Medium risk
External work in support of charities, public health campaigns, or local community organisations	Low to medium risk
External work as an artist or performer	Low risk
External work that involves endorsing a commercial organisation, product or service	Extremely high risk – <i>see note below</i>

**Note regarding commercial endorsements:** As noted above, external work involving commercial endorsements is regarded as extremely high risk. Workers whose ABC roles rely on maintaining impartiality in the public eye (e.g. journalists and presenters of news and information content) will generally not be permitted to undertake such work. Workers in other roles may be permitted to do so but must take care not to imply that the ABC endorses the organisation, product or service. Where such work takes place on a worker's personal social media account – for example, engaging in influencer marketing or other native advertising arrangements – the worker must also adhere to the ABC's [Personal Use of Social Media Guidelines](#).

## Who the external work is for

The nature of the organisation that the external work is being done for has a strong impact on the perception of independence. The table below provides some examples:

Type of organisation	Risk level
Political party	Extremely high risk – unlikely to be approved other than in exceptional circumstances
Lobby group, campaign organisation, union, large public company	Very high risk
Think tank, NGO, low-profile company	Medium to high risk, depending on how controversial or politically partisan the organisation is or is perceived to be

Type of organisation	Risk level
Another publisher or media outlet	Low to medium risk depending on the nature of the work
University, school, cultural event	Low risk
Charity	Risk level varies – <i>see note below</i>

**Note regarding charities:** ABC staff, particularly high profile staff, are often offered board positions on charities or other not-for-profits. The fiduciary duties attached to these positions present potential conflicts and the potential for reputational harm if the organisation is involved in scandal or financial difficulty. The risk varies depending on the nature of the organisation – low for small community organisations and greater for large national bodies. Non-board and non-executive roles are generally preferred to board or executive positions.

## Payment or other compensation

The amount of money received for external work, or any other associated benefits relating to external work, substantially affect the perception of independence. The larger the amount of money, the greater the risk of potential compromise.

Payments of less than \$500 are considered **low risk**, payments between \$500 and \$5000 are considered **medium risk**, payments between \$5000 and \$15000 are considered **high risk**, and payments over \$15000 are considered **extremely high risk**. Regular payments or ongoing relationships are considered **high risk**.

## Weighing up the risk factors

Once the factors outlined above have been carefully considered, the worker and manager will have a reasonably clear sense of the overall risk level. As a general guide, if the factors are mostly assessed as low or medium risk, the request can likely be approved; if there are multiple factors assessed as high, very high or extremely high risk, the request will likely be rejected.

Consideration should also be given to the potential benefits of the external work, which may offset some of the risks. Examples of benefits include:

- Raising the profile of the ABC in local and other communities;
- Participating in and encouraging rational debate of public policy and social issues;
- Engaging in activities that encourage or contribute to social cohesion;
- Developing contacts that may be of benefit to the ABC.



## What outcomes are available?

There are several possible outcomes for any external work request. These are outlined below.

### Avoid or reject

In most high risk cases, avoiding the editorial conflict altogether is the only option available. In these situations, the external work request would be rejected and a record kept of the reasons for not proceeding.

### Proceed but mitigate

In some cases, practical steps can be taken to reduce the conflict of interest risk or eliminate it altogether. For example, the nature or extent of the external work could be changed to eliminate any conflict. Other potential mitigations might include declining payment for the external work, declining paid expenses, or altering the timing of the external work to avoid any real or perceived conflict.

### Proceed and declare

In some cases, especially those where a degree of close consideration and mitigation has been undertaken, it may be determined that a residual potential conflict exists but is manageable and does not require the external work to be declined. In such circumstances, the external work should be transparently and prominently declared in such a way that it allows relevant ABC audiences and stakeholders to be aware of it.

### Proceed

There will be circumstances where, after a careful examination of all relevant risks, no issues are identified and external work can be approved and proceed without further disclosure or mitigation. A record of the approved work would still be required to be retained.

## How do we manage external work predating a worker's engagement by the ABC?

A wide range of people work for the ABC on a full time, part time, contract or casual basis. Many come to the ABC having worked in many different capacities for other individuals and organisations. They may also have ongoing work obligations or arrangements that have some risk attached.

A commonsense approach should be taken in assessing whether real, potential or perceived editorial conflicts between external and ABC work are serious enough to be a barrier to hiring or that cessation of existing arrangements should be a prerequisite to employment.

In relation to serious past work conflicts a period of time might be required to have elapsed to mitigate potential risk.

In less extreme cases it will usually be sufficient for the ABC to satisfy itself that any past conflict of interest has ended and there are no practical aspects of it that remain.

## **Status of guidance note**

This guidance note, authorised by the Managing Director, is provided to assist interpretation of the Editorial Policies to which the guidance note relates. The Editorial Policies contain the standards enforceable under the ABC's internal management processes and under the ABC's complaints handling procedures.

It is expected the advice contained in guidance notes will normally be followed. In a given situation there may be good reasons to depart from the advice. This is permissible so long as the standards of the Editorial Policies are met. In such situations, the matter should ordinarily be referred upwards. Any mandatory referrals specified in guidance notes must be complied with.

*Issued: 29 July 2016, Revised: 21 October 2024*



# ABC Policy- Code of Conduct

## PRINCIPLES

The ABC is an independent media organisation providing broadcasting and digital media services within and outside Australia. This Code of Conduct outlines the required values, behaviours and standards which all ABC workers must demonstrate.

## WHO AND WHEN

This policy applies to all ABC employees, all ABC suppliers, contractors and subcontractors, work experience students, interns and all ABC volunteers (Workers).

## VALUES

ABC Values are the foundation of our work. ABC workers are expected to demonstrate the following ABC Values in all aspects of work:

### Aim high

- We set high standards, prioritise action, and pursue excellence in all we do.
- Our focus is on delivering distinctive, relevant and impactful content for audiences.
- We give clear and thoughtful feedback, early and often, to drive our performance.

### Think differently

- Curiosity and creativity drive us to explore new ideas even when they challenge our thinking or the status quo.
- We solve problems creatively, Look for smarter ways to do things, and are not afraid to act in the best interests of the ABC.

### Take ownership

- We are accountable for our work from start to finish, reflecting on and applying Lessons Learned to the future.
- Our behaviour matters. We take responsibility for the impact we have on others.

### Deliver together

- By collaborating across teams, we harness our collective expertise to deliver the best outcomes for audiences.

- We recognise and celebrate the contribution others make towards our shared success.

## STANDARDS

ABC Workers must also conduct themselves in accordance with specified standards of behaviour as follows:

- Work and act with professionalism, care and diligence.
- Comply with any lawful and reasonable direction given by a person in the ABC who has authority to give such a direction.
- Treat colleagues and the public with respect and courtesy.
- Demonstrate ethical behaviour consistent with the best interests and good name of the ABC.
- Act in good faith, for a proper purpose and only use ABC resources and information for legitimate ABC purposes.
- Advise the ABC of criminal charge or conviction which is related to or impacts on the worker's ability to perform the inherent requirements of their job.
- Not engage in any behaviour which may constitute as unlawful bullying, discrimination, harassment, sexual harassment or victimisation of others. Such behaviour will not be tolerated by the ABC.
- Speak up about any behaviour which may constitute unlawful bullying, discrimination, harassment, sexual harassment or victimisation of others.
- Ensure activities including commercial, personal, and political relationships, do not constitute an actual, potential or perceived conflict of interest compromising the integrity, independence, impartiality and high standards of the ABC.
- Ensure you protect the ABC's reputation or the independence or integrity of ABC content where external activities, including public comment, may intersect with your professional life.
- Comply with all relevant legal and administrative requirements, including all ABC policies, procedures, guidelines and industrial agreements.

## BREACHES OF ANY ABC POLICY, GUIDELINES AND PROCEDURES:

Any breach of ABC policies, guidelines and procedures must be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action, including possible termination of employment.

For contractors, a breach must be dealt with in accordance with the relevant contractual provisions and may result in termination of contract. Where a breach of policy constitutes a breach of any law, action may also be taken in accordance with that law by the ABC or concerned third parties.

## ACCOUNTABILITY

Managing Director

## RELEVANT PROCEDURES AND GUIDELINES

- [Anti-Discrimination, Anti-Bullying and Anti-Harassment Policy](#)
- [Conflict of Interest Policy](#)
- [Fraud & Corruption Policy](#)
- [Public Comment Guidelines](#)

## DOCUMENT HISTORY

- Reviewed July 2025 (Endorsed by ABC Board July 2025)
- Reviewed June 2025 (Endorsed by ABC Board June 2025)
- Reviewed 2024 (Endorsed by ABC Board August 2024)
- Reviewed 2023 (Endorsed by PSC 10 May 2023, approved by ABC Board 9 June 2023)
- Created 2020 (Endorsed by ABC Board 26 Aug 2020, approved by Executive 23 July 2020)-  
Superseded policy: Workplace Behaviour

# External Work Approval Request



External work undertaken by ABC workers requires approval in accordance with the ABC [Conflict of Interest Policy](#), the specific guidelines for [External Work](#) and, where applicable, the guidance on [External Work and Editorial Conflicts](#). This form should be completed and submitted to your Manager or a more senior manager. This form will be reviewed and approved by the Manager you select and then be sent to your divisional director for approval. Prior approval is not required to undertake voluntary work.

\* denotes mandatory fields

[Help](#)

Employee Approvals

Employee

Name \*

Payroll Number

Title

Division \*

Section

Location \*


Form of ABC employment

Who is the work for? \*

Nature of External Work? \*

Location \*

Duration \*

Location *	<input type="text"/>	Duration *	<input type="text"/>
Date * (dd/mm/yyyy)	<input type="text"/>		
Payment * <input type="radio"/> Unpaid <input type="radio"/> \$1 - \$500 <input type="radio"/> \$500 - \$5,000 <input type="radio"/> \$5,000 - \$15,000 <input type="radio"/> \$15,000 - \$25,000			
Other material benefits (i.e. travel, accommodation) *	<input type="text"/>		
Any other benefits to you, the ABC or the community? *	<div><div></div></div>		
Details of any ABC resources or ABC confidential information required? * <input type="radio"/> No <input type="radio"/> Yes			
Will there be publicity/promotion of your involvement? * <input type="radio"/> No <input type="radio"/> Yes			
Will this work require you to take leave or otherwise restrict your availability to perform your ABC duties? * <input type="radio"/> No <input type="radio"/> Yes			
Advice obtained from Editorial Policy Advisor? * <input type="radio"/> No <input type="radio"/> Yes			

Could the work have any bearing on your ability to do your job (for example, if you are a journalist, could it have any bearing on perceptions of your impartiality)? \*

☐ No ☐ Yes

Could the work damage the ABC's reputation for impartiality and independence? \*

☐ No ☐ Yes

Describe any real, potential or perceived conflicts of interest and how they will be managed. You should include all possible conflicts, no matter how remote the risk of them occurring.\*

Is there any other relevant information? Please enter details below

Please attach any relevant documents [+ Add Attachment](#)

Cancel

Next >>

Save to complete later

\* denotes mandatory fields

Employee

Approvals

#### Approvals

##### Manager Review

Select your Manager,  
or a more senior manager \*  
(one person only)

This form will be reviewed and approved by the Manager selected and then be sent to your divisional director for approval.

##### Notification

Other Managers/Persons to notify  
(e.g. Head of Department. Max 3 Users)

Cancel

<< Previous

Save to complete later

Submit



# Public Duty - Private Interest Form

[Purpose of This Form](#)[Private Interest Form](#)[Attachments](#)

The [Conflict of Interest Policy](#) requires that all ABC employees regularly assess the potential for a real or perceived conflict of interest that may appear to influence the performance of their work or may adversely impact the ABC's operations or reputation.

As part of this, you are required to complete a Public Duty – Private Interest Statement (**Statement or this form**) annually or at any time when your circumstances change.

## Why is this information being requested

The ABC needs to actively manage the risks of conflict of interest in order to safeguard its reputation and meet the high level of expectation regarding public accountability and integrity in decision making.

## How the information will be used

Once completed, the Statement will be provided to your manager, who will assess whether the matters disclosed have any operational impact or require any changes to your role and responsibilities.

For example, your manager might ask that you not work on particular negotiations, projects, stories or activities that relate to your outside association or interest or that your disclosure be broadcast or published online.

If your disclosure is broadcast or published, care should be taken that it cannot be construed as promoting an entity with which you have declared an association or interest.

In accordance with the Conflict of Interest Policy, you will not be permitted to exercise any authority or delegation to enter into any transaction which would result in you, your family, friends or associates deriving (either directly or indirectly) any payment, benefit, consideration, opportunity or reward unless you have disclosed the circumstances giving rise to the benefit and the transaction has been approved by your manager.

Your manager will record details of their assessment and actions that are agreed to be undertaken to address the matters disclosed. You will be asked to confirm your acknowledgement of these agreed actions.

The Statement (and details of any actions agreed) will form part of your personnel file.

Further information is available in the [Conflict of Interest Policy](#), Disclosure Procedures and the Guidance Notes.

[Click to continue](#)

Purpose of This Form

Private Interest Form

Attachments

### Privacy Collection Statement

The information you provide will be handled in accordance with the [ABC Employee, Contractor and Supplier Privacy Policy](#).

This form asks you to provide the ABC with information about you that is sensitive in nature. If you choose to not provide this information, the extent and nature of your working arrangements with the ABC may be impacted.

You will be provided with an opportunity at the end of the form to confirm that you wish to submit your information.

☐ Are you lodging for someone else?

### 1. Declaration

\* ☒ I do have information to declare (please enter below)

☐ I do not have anything to declare

### 2. SHARES OR INTERESTS IN A COMPANY, BUSINESS, PARTNERSHIP OR JOINT VENTURE

For each category described below, please provide further detail about the name/nature of the organisation, the percentage of your shareholding or interest and the identity of family members, friends or associates with shareholdings or interests, where this might be relevant (having regard to the Conflict of Interest Policy, the Disclosure Procedures and the [Guidance Notes](#)).

Note: any interest which is less than 5% in a publicly listed company does not need to be disclosed.

2.1. Name of Organisation/Business:

Nature of Organisation/Business:

Interest/Shareholding:

%

No of Shares

[+ Add](#)

Other related interests (e.g. family members, friends or associates with interests or shareholdings )

### 3. DIRECTORSHIPS OR ANY OTHER POSITIONS HELD IN ORGANISATIONS OR BUSINESSES

Note this section requires disclosure of both paid and voluntary activities.

3.1. Name of Organisation/Business:	<input type="text"/>
Nature of Organisation/Business:	<input type="text"/>
Position Held:	<input type="text"/>

[+ Add](#)

Other related interests (e.g. family members, friends or associates holding position in a relevant organisation/business)

### 4. OWNERSHIP OF COMMERCIAL LAND OR BUILDINGS

4.1. Location:	<input type="text"/>
Nature of commercial interest:	<input type="text"/>

[+ Add](#)

Other related interests for ownership of commercial land or buildings

### 5. OWNERSHIP OR INTEREST IN INTELLECTUAL PROPERTY

E.g. copyright, trade marks, program rights, designs, patents, domain names

### 6. ANY OTHER RELEVANT PERSONAL/FINANCIAL/POLITICAL INTEREST, ASSOCIATION OR ACTIVITY

#### **Confirmation**

\* ☐ I consent to the ABC's collection of my sensitive and personal information.

Purpose of This Form

Private Interest Form

Attachments

Attachments (0)



No files found.

Drop files to upload, or use the "+" button.