

## About the ABC

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# Legislative framework

The ABC is a federal agency which works within the following legislative framework.

## The ABC Act 1983

The *Australian Broadcasting Corporation Act (1983)* (ABC Act) is the instrument which established the ABC.

- [ABC Act](#)

## The ABC Charter

The ABC Charter is contained in s6 of the [ABC Act](#). It outlines the ongoing functions and responsibilities of the ABC.

### 6 Charter of the Corporation

- (1) The functions of the Corporation are:
  - (a) to provide within Australia innovative and comprehensive broadcasting services of a high standard as part of the Australian broadcasting system consisting of national, commercial and community sectors and, without limiting the generality of the foregoing, to provide:
    - (i) broadcasting programs that contribute to a sense of national identity and inform and entertain, and reflect the cultural diversity of, the Australian community; and
    - (ii) broadcasting programs of an educational nature;

- (b) to transmit to countries outside Australia broadcasting programs of news, current affairs, entertainment and cultural enrichment that will:
  - (i) encourage awareness of Australia and an international understanding of Australian attitudes on world affairs; and
  - (ii) enable Australian citizens living or travelling outside Australia to obtain information about Australian affairs and Australian attitudes on world affairs; and
- (ba) to provide digital media services; and
- (c) to encourage and promote the musical, dramatic and other performing arts in Australia.

Note: See also section 31AA (Corporation or prescribed companies to be the only providers of Commonwealth-funded international broadcasting services).

- (2) In the provision by the Corporation of its broadcasting services within Australia:
  - (a) the Corporation shall take account of:
    - (i) the broadcasting services provided by the commercial and community sectors of the Australian broadcasting system;
    - (ii) the standards from time to time determined by the ACMA in respect of broadcasting services;
    - (iii) the responsibility of the Corporation as the provider of an independent national broadcasting service to provide a balance between broadcasting programs of wide appeal and specialized broadcasting programs;
    - (iv) the multicultural character of the Australian community; and
    - (v) in connection with the provision of broadcasting programs of an educational nature—the responsibilities of the States in relation to education; and
  - (b) the Corporation shall take all such measures, being measures consistent with the obligations of the Corporation under paragraph (a), as, in the opinion of the Board, will be conducive to the full development by the Corporation of suitable broadcasting programs.

- (3) The functions of the Corporation under subsection (1) and the duties imposed on the Corporation under subsection (2) constitute the Charter of the Corporation.
- (4) Nothing in this section shall be taken to impose on the Corporation a duty that is enforceable by proceedings in a court.

## The Public Governance, Performance and Accountability Act 2013

The ABC is a corporate Commonwealth entity operating under *Public Governance, Performance and Accountability Act 2013* (the PGPA Act). The PGPA Act sets the standards of governance, performance and accountability for all Commonwealth entities. It imposes specific duties on the ABC Board and Executive relating to things such as the preparation of financial statements, the way in which accounts are to be maintained, the disclosure of directors' interests, and the preparation of annual reports. It also imposes general duties on all ABC employees to, amongst other things, act honestly, in good faith and for a proper purpose.

- [PGPA Act](#)

## Freedom of Information Act 1982

See [Freedom of Information](#).

## Privacy Act 1988

The *Privacy Act 1988* regulates how an individual's personal information is handled. It covers:

- how personal information is collected
- how it is then used and disclosed
- its accuracy

- how it is kept and protected
- an individual's general right to access their personal information.

The ABC must comply with the 13 Australian Privacy Principles (APPs) in the Privacy Act 1988.

- [Privacy Act 1988](#)
- [Privacy at the ABC](#)

## Public Interest Disclosure Act 2013

The [Public Interest Disclosure Act 2013](#) promotes the integrity and accountability of the Commonwealth public sector, including the ABC. It creates a framework for reporting suspected wrongdoing and ensuring the timely and effective investigation of reports. The Act provides protections for public officials making such reports.

Further information on the *Public Interest Disclosure Act 2013* can be found on the website of the [Commonwealth Ombudsman](#).

The ABC deals with public interest disclosures in accordance with the ABC's [PID procedures](#). If you are considering making a public interest disclosure, please refer to the PID procedures.

ABC Authorised Officers can be contacted in the following ways:

Email:	Whistleblower.Hotline@abc.net.au
Phone:	1800 895 213
Mail:	<p>Marked CONFIDENTIAL and sent to:</p> <p>The Authorised Officer</p> <p>Public Interest Disclosures</p> <p>c/of ABC Audit</p> <p>Level 14</p>

700 Harris Street
Ultimo NSW 2007

## Employment-related legislation

As a Commonwealth authority employer, the ABC is also bound by the provisions of a number of statutes regulating employment and workplace matters.

- [Equal Employment Opportunity \(Commonwealth Authorities\) Act 1987](#)
- [Racial Discrimination Act 1975](#)
- [Sex Discrimination Act 1984](#)
- [Australian Human Rights Commission Act 1986](#)
- [Disability Discrimination Act 1992](#)
- [Age Discrimination Act 2004](#)
- [Fair Work Act 2009](#)
- [Work Health and Safety Act 2011](#)

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The ABC has grown remarkably since it launched on 1 July 1932. This is a snapshot of our achievements, programs and personalities and celebrates the ABC's contribution to Australian life for more than 80 years.

## ABC International Development

The ABC International Development team uses its media expertise to connect and empower people in the Asia-Pacific region, and globally, to have a voice. [Learn more.](#)

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ACCESS ABC / 08 Nov 2018

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FROM THE EDITORIAL DIRECTOR /  
10 Sep 2018

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FROM THE EDITORIAL DIRECTOR /  
06 Aug 2018

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We acknowledge Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work.

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# PRINCIPLES

## WE ARE ABC

- We think whole of ABC first
- We work across teams to get the best outcome for the organisation and our audiences
- We continuously learn and grow to meet audience needs
- We inspire each other to deliver on the Charter and champion fearless and impartial public broadcasting
- When we fail, we stop, assess, learn and move on

## STRAIGHT TALKING

- We have brave and honest conversations with each other in our teams
- We give honest feedback on performance
- We welcome honest feedback on our own performance
- We ask why and we encourage our colleagues to do the same

## PEOPLE FOCUSED

- We aim to be the team we are proud to work in
- We build diverse and inclusive teams
- We empower and support each other
- We act on good ideas and value creativity
- We acknowledge our success and our struggles
- We support our teams through the challenges of a changing media world
- We take action for the wellbeing and safety of all our colleagues

## ACCOUNTABLE

- We set goals for ourselves and the team
- We clear roadblocks that stop our team moving forward
- We take responsibility as employees to deliver results for the team, the ABC and our audiences
- We value innovation and new ways of working to get results

## OPEN & TRANSPARENT

- We share information with each other in our teams
- We listen and we explain decisions
- We share decision-making wherever possible
- We build trust in our teams
- We trust that our colleagues will do the right thing





# Child Protection Policy

**Status:** Approved

**Document number (TRIM):**

**Policy issued:** 4 August 2015

**Policy Owner:** Director ABC People  
82 5160

## Policy Statement

The ABC is committed to protecting Children and Young People from any harm to health, safety and welfare and to eliminating the risk of harm that may arise from the involvement of Children and Young People in the creation and delivery of ABC content and services.

The ABC is committed to protecting the welfare of Children and Young People in all aspects of its operations, including the creation and delivery of content and services.

## Purpose of this Policy

To establish the Core Values and principles that must be followed when engaging with Children and Young People.

It is not the purpose of this policy to control or influence editorial decision making, for instance by restricting the nature of material broadcast or published on ABC platforms.

## Who it applies to

All Workers and Other Persons at Work.

## Consequences of breach

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

## Definitions

**Chaperone:** A person engaged or appointed for the purpose of supervising one or more Children.

**Child:** A person legally defined as a Child in the relevant legislation governing the jurisdiction in which the Child lives or works.

**Child Protection Officer:** A person nominated by the ABC to provide advice in relation to Child protection, monitor validity of Working With Children checks, and respond to complaints and incidents involving Children and Young People.

**Guardian:** A person who is recognised as acting *in loco parentis* to a Child.

**Other Person at Work:** Any person in the workplace who is not a Worker, such as visitors and guests.

**Worker:** 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.

**Workplace:** A place where work is carried out for a business or undertaking and includes any place where a Worker goes, or is likely to be, while at work. It includes a vehicle, or other mobile structure and any temporary or permanent installation on land whilst undertaking travel for business related purposes.

**Young People:** A person under the age of 18 who may or may not fall within the legal definition of Child in a particular jurisdiction.

## Details of Policy

### Background

The ABC wants Children and Young People to have a positive engagement with the ABC, whether they are working for the ABC, visiting ABC premises, or consuming products and services. When a Child or Young Person is involved in any activity being undertaken by the ABC, their welfare is paramount and takes priority over operational and production outcomes.

This Policy applies in all circumstances where Workers and Other Persons at Work have contact with Children and Young People, including but not limited to when a Child or Young Person is:

- Participating in content production as talent (either paid or voluntary)
- Working for the ABC (for instance, as a trainee or on work experience)
- Visiting an ABC Workplace (for instance, on a tour)
- Attending an event (for instance, an ABC Commercial concert)
- Engaging with the ABC on social media platforms
- Accompanying a parent or carer to an ABC Workplace.

### Child protection - Core Values

The ABC expects all Workers to comply with the following core values when engaging with Children at any time:

1. Treat Children and Young People with care, respect and dignity at all times.
2. Be alert to the safety of Children and Young People at all times.
3. Never take sole responsibility for a Child or Young Person, except in an emergency. If a Child or Young Person needs care, speak to their parent, Guardian or Chaperone.
4. Behave appropriately and use appropriate language when you are with Children and Young People. This includes never smoking around them.
5. Set and expect appropriate behaviours from Children and Young People, both in relation to safety requirements and standards of behaviour.
6. Be open and clear in all of your communication with Children and Young People.
7. Listen when a Child or Young Person speaks to you. If a Child or Young Person makes a complaint, or any comment which suggests their welfare may be at risk, you have a duty to report it immediately.
8. When a Child or Young Person is participating in ABC content in any way, meet the requirements of the Principles and Standards relating to Children and Young People in the *ABC Editorial Policies* (<https://intranet.abc.net.au/know-the-abc/teams/editorial-policies>).

### Working with Children

Children and Young People perform work at the ABC in a range of circumstances, including:

- content production
- work experience and traineeships
- junior shop assistants.

In the event that Children or Young People perform work for the ABC (whether paid or voluntary), the [Guidelines for Employing Children](https://intranet.abc.net.au/business-processes/child-protection-framework/guidelines-for-employing-children) (<https://intranet.abc.net.au/business-processes/child-protection-framework/guidelines-for-employing-children>) must be followed. This may include a requirement to undertake a [Working With Children Check](https://intranet.abc.net.au/business-processes/child-protection-framework/checks-if-you-are-working-with-children) (<https://intranet.abc.net.au/business-processes/child-protection-framework/checks-if-you-are-working-with-children>). The ABC's Child Protection Officer must be notified of an individuals' Working With Children Number, where they require a Working With Children Check for work undertaken on behalf of the ABC (either paid or voluntary). Further information about this and the steps that need to be taken is available in the [Child Protection Flowchart](https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/palpolicies/childprotection/ChildProtectionflowchartPOL.pdf) (<https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/palpolicies/childprotection/ChildProtectionflowchartPOL.pdf>) [PDF 262 Kb].

The Guidance Note [Children and Young People: Managing their Participation in Broadcast](http://about.abc.net.au/reports-publications/children-and-young-people-managing-their-participation-in-broadcast-guidance-note) (<http://about.abc.net.au/reports-publications/children-and-young-people-managing-their-participation-in-broadcast-guidance-note>) provides guidance about the creation of ABC children's broadcast content and the management of children's participation in it.

### Children who accompany a parent to work

Generally, Workers should not bring their children into an ABC Workplace with them. The ABC recognises that exceptional circumstances may arise where bringing a Child or Young Person to work is unavoidable. In such cases, the Worker must have permission from their manager to bring their child to work.

If a Worker is given permission for their child to be brought into an ABC Workplace, the Child or Young Person should remain under the direct supervision of their parent or Guardian at all times.

## **Supervision**

Children and Young People must be supervised by a parent, Guardian or Chaperone while at any ABC Workplace. Workers should not have contact with a Child or Young Person without the parent, Guardian or Chaperone present.

A Worker must not be placed in a position where they are required to be the supervisor of a Child or Young Person (other than in relation to their own Child).

## **Physical contact**

Workers should avoid physical contact with a Child or Young Person. If a Child or Young Person is in obvious distress, or approaches a Worker, the Worker must act responsibly and in public. Any such contact should be age appropriate. Workers should avoid any contact in isolated areas (such as a green room or edit suite).

If physical contact is necessary, for example by a makeup artist or by a sound engineer attaching a radio microphone, the Child or Young Person should be accompanied by a parent, Guardian or Chaperone and doors must be kept open. Where possible, the Child or Young Person should be within the hearing of others. The Child or Young Person should be told the nature and purpose of the contact, and their permission obtained. A Child should never be made to feel uncomfortable in any way.

## **Online safety**

Children and Young People are particularly vulnerable in online spaces, and the ABC's child protection obligations extend to engagement with Children and Young People via the ABC's digital media services.

The Guidance Note [Children and Young People: Managing their Participation Online \(http://about.abc.net.au/reports-publications/857\)](http://about.abc.net.au/reports-publications/857) provides guidance about the management of children's participation in ABC-managed online spaces, including abc.net.au websites and third party sites, which are specifically designed for Children and/or based around children's content.

Under no circumstances is it appropriate for a Worker to use their position at the ABC to create a personal relationship of any kind with a Child or Young Person on any social media platform.

## **Third party involvement with Children and Young People**

The ABC has a responsibility to ensure that child protection implications are considered in agreements with third party providers (producers, promoters etc). The ABC must take reasonable steps (where relevant) to ensure that agreements include clauses that presenters/talent and relevant staff of the third party have the required Working with Children checks. If this is the case, provisions should also be included in the agreement so that the ABC has visibility on compliance with the Working with Children checks.

In some instances, the ABC may also require that the third party provider has appropriate Child Protection Policies in place.

An [information sheet for third parties \(https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/palpolicies/childprotection/ChildProtectionObligationsForExternalPartiesPOL.pdf\)](https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/palpolicies/childprotection/ChildProtectionObligationsForExternalPartiesPOL.pdf) [PDF 469 Kb] about their Child Protection responsibilities is available on the intranet.

## **Risk Assessment**

Any proposed activity which involves Children or Young People must include a consideration of the specific risks associated with the safety and welfare of Children and Young People.

## **Personal Information about Children and Young People**

Personal information about Children and Young People must be protected in accordance with the [ABC Privacy Policy \(https://intranet.abc.net.au/privacy-statement\)](https://intranet.abc.net.au/privacy-statement) and [Information Handling Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/information-handling-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/information-handling-policy)

## **Complaints and incidents**

Every Worker has a role to play in the protection of Children and Young People. Any Worker who witnesses any inappropriate behaviour, or who has concerns for the welfare of a Child or Young Person, must report the matter to the ABC's Child Protection Officer (<mailto:Child.Protection@abc.net.au>). To the extent that a Worker is able to take immediate steps to safeguard a Child or Young Person they should do so.

If there is a medical emergency involving a Child or Young Person, a Worker must take appropriate steps to provide assistance. This may include providing first aid or calling 000 to notify the ambulance service. As soon as practicable, the Worker should notify the parent, Guardian or Chaperone, and the Worker's Manager, report the incident in [RiskSafe \(https://ermgov.protecht.com.au/abc\)](https://ermgov.protecht.com.au/abc) and report the matter to the Child Protection Officer.

If there is no immediate risk of harm to a Child or Young Person, the matter should be reported to the Worker's Manager and the Child Protection Officer. If the matter involves the Worker's Manager or if the Worker is not comfortable raising it with their Manager, it should be referred directly to the Child Protection Officer.

Any Worker who witnesses behaviour which may be innocent but potentially in breach of this Policy (for instance, a colleague who hugs a Child at the end of a production), is encouraged to remind that person about the Policy and the risks associated with the behaviour.

## Related Policy Information

### Procedures and Guidelines

- [Children and Young People: Managing their Participation Online \(http://about.abc.net.au/reports-publications/857\)](http://about.abc.net.au/reports-publications/857)
- [Children and Young People: Managing their Participation in Broadcast \(http://about.abc.net.au/reports-publications/children-and-young-people-managing-their-participation-in-broadcast-guidance-note\)](http://about.abc.net.au/reports-publications/children-and-young-people-managing-their-participation-in-broadcast-guidance-note)
- [Guidelines for Employing Children \(https://intranet.abc.net.au/business-processes/child-protection-framework/guidelines-for-employing-children\)](https://intranet.abc.net.au/business-processes/child-protection-framework/guidelines-for-employing-children)
- [Working With Children Checks \(https://intranet.abc.net.au/business-processes/child-protection-framework/checks-if-you-are-working-with-children\)](https://intranet.abc.net.au/business-processes/child-protection-framework/checks-if-you-are-working-with-children)

### Other relevant Policies and Information

- [Editorial Policies \(https://intranet.abc.net.au/know-the-abc/teams/editorial-policies\)](https://intranet.abc.net.au/know-the-abc/teams/editorial-policies)
- [ABC Values and Standards of Workplace Behaviour \(https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour\)](https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour)
- [Discrimination, Bullying and other Workplace Behaviours Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/discrimination-bullying-and-other-workplace-behaviour-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/discrimination-bullying-and-other-workplace-behaviour-policy)
- [Information Handling Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/information-handling-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/information-handling-policy)
- [ABC Privacy Policy \(https://intranet.abc.net.au/privacy-statement\)](https://intranet.abc.net.au/privacy-statement)

## Document History

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- Reviewed 2015 (Endorsed by PRG 1 Jul 2015; Approved by Executive 4 Aug 2015)



Guidance Note

## Children and Young People: Managing their Participation Online

Issued: 11 April 2011  
Revised: 9 October 2012

### 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. Guidance notes provide advice to assist in the interpretation of the Editorial Policies, which contain the standards enforceable under the ABC's internal management processes and under the ABC's complaints handling procedures.

It is expected that staff will normally act in accordance with the advice contained in Guidance Notes. 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.

### Key Editorial Standards

Excerpts of key editorial standards relevant to this Guidance Note are set out below. Other editorial standards may also be relevant, depending on the specific circumstances applying in each case.

#### 8 Children and young people

- 8.1 Take due care over the dignity and physical and emotional welfare of children and young people who are involved in making, participating in and presenting content produced or commissioned by the ABC.
- 8.2 Before significant participation of a child or young person in content produced or commissioned by the ABC, or in interactive services offered by the ABC, consider whether it is appropriate to obtain the consent of both the child/young person and the parent/guardian.
- 8.3 Adopt appropriate measures wherever practicable to enable children and young people, or those who supervise them, to manage risks associated with the child/young person's participation with, use of and exposure to ABC content and services designed for them.
- 8.4 Take particular care to minimise risks of exposure to unsuitable content or inappropriate contact by peers or strangers.

### Mandatory referrals

Any proposal for post-moderation or reactive moderation of an ABC-managed children's site must be approved by an appropriately senior ABC person designated for the purpose within the responsible division.

Any proposal to create an ABC children's presence on a third party social media site must be approved by an appropriately senior ABC person designated for the purpose within the responsible division and the division's Social Media Representative.

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## **Introduction**

The ABC aims to provide children with enjoyable and enriching online content as well as opportunities for them to express themselves safely. In doing so, the ABC must ensure that children are not unnecessarily disturbed or distressed as either contributors to or consumers of content.

## **Scope of this Guidance Note**

This document provides guidance about the management of children's participation on ABC-managed online spaces, including abc.net.au websites and third party sites, which are specifically designed for children and/or based around children's content.

For the purposes of this guidance, children and young people are under the age of 18 years. There is no set age at which a child transforms into a young person. The ABC recognises that individual needs and interests can differ vastly across early childhood, childhood and young adulthood. Relevant factors to bear in mind include the child or young person's age, level of maturity and understanding.

## **Privacy and protection of children**

The online protection of children is a shared responsibility between the ABC, the parent/guardian and the child. The ABC aims to ensure that children and young people who engage with our online spaces understand the possible risks they face and how to minimise them. Providing information about online safety is encouraged on ABC sites designed for children.

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We should be careful about how much personal information we collect, reveal and retain about children anywhere on ABC sites as publication of too much information may put a child at risk. The ABC should not publish a child's private contact details (address, email, telephone, etc.). If someone else has published a child's private contact details on any of the ABC's interactive services, the ABC should take reasonable steps to remove such details as soon as it becomes aware. Where it is appropriate in the context to publish personally identifiable information (full name, activity locations, school references, etc.) additional measures should generally be used to minimise the risks of exposure to inappropriate contact by peers or strangers. Relevant measures might include publishing the information within photo, video or audio content rather than as searchable text, separating the information from a child's user account, and obtaining verifiable parental consent (see 'Consent' below). Even with such measures in place, the usual preference for naming younger children is to use first names only. The ABC must also be aware of the persistence of online media where aggregate profiles can form over time through the accumulation of UGC (especially when that media includes photos or video where the child is featured).

Given the sensitivities and risks involved, whenever personally identifiable information is published, we should be responsive to takedown requests from the child or young person or their parent or guardian. If it is intended not to accommodate a takedown request, consult ABC Legal.

It is important that young children should not get into the habit of easily revealing personal details about themselves or their family on the internet. Where we invite children to send us information about themselves, for example a name and email address to enter a competition, we should explain why we need it in language which children can understand. In keeping with the requirements under relevant privacy law, this information should be retained securely, only for as long as is needed, and used only for the purpose for which it was sent.

## Consent

When the ABC invites children to participate online or provide personal contact information, as well as the child's consent we need to consider what degree of parental consent is appropriate. Depending on the nature of the contribution this might include –

- Reminding a child to ask for parental consent.
- Requiring the use of a check box to confirm that consent has been obtained before the child can proceed.
- Verifiable parental consent e.g. a signed letter or personal telephone call from a parent or guardian.

Factors to consider when deciding on the method of consent include –

- The age of the child. The younger the participant the more likely parental consent will be required.
- The developmental stage of the child or young person. Will they understand what is going to happen to their contribution or the information we want them to send?
- The type of content or interaction; does it involve text, artwork, photos, audio or video?
- The sensitivity of the information or subject matter.
- The risks associated with the contribution or information. What is the likelihood of any adverse effects for the child?
- The length of time we are publishing or storing it.
- The extent to which the content or interaction will be publicly available or promoted.

The participation and/or information we request will have varying degrees of sensitivity and may require different levels of parental involvement. For example, participation on a children's message board is unlikely to require parental consent, but their contribution to a video-based competition where the ABC needs a child's email and mobile phone number, would likely require verifiable parental consent.

## Moderation of children's UGC

In order to ensure a child's privacy is maintained and they are protected from exposure to adult themes, language, or inappropriate contact, UGC on ABC managed children's sites is usually pre-moderated. Any proposal to use post-

moderation or reactive moderation on such sites must be referred to an appropriately senior ABC person designated for the purpose (see 'Mandatory referrals' above).

On third party sites, UGC cannot be pre-moderated and requires a risk management approach to be adopted. This includes mandatory referral for the creation of the page, limiting interactivity and active post-moderation by trained ABC staff.

## **Social media and third party platforms**

The ABC acknowledges that engaging with third party social media sites provides an opportunity to reach audiences who are active in these spaces but does pose some risks for children and young people.

Before creating any ABC children's content page on a third party social media site, consideration must be given to the following –

- What is the editorial purpose of the page and how does this meet with your overall editorial and promotional strategy?
- Who is the likely audience for the content and is the site suitable for them?
- Could you achieve the same effect on abc.net.au?
- What commitment are you willing to make to the site? Do you have the resources to keep it engaging, relevant and actively post-moderated by trained staff?
- How will you measure success and what is your exit strategy should the page need to be removed?

## **8**

In addition, serious consideration must be given as to whether it is appropriate to create third party social media pages around content specifically designed for younger children. Children and young people do run risks on social networking sites as their technical ability often exceeds their social skills. They may be at risk from bullying or become targets for online grooming.

Most social networking sites have content rules and standards designed for teenagers and adults. The ABC must be sensitive to the minimum age requirements mandated by particular social networking sites such as Facebook which is 13 years.

If a decision is made to create a children's page on a social networking site, consideration must be given to how risk can be managed and reduced. This may include such things as limiting contact functionality on pages, carefully scrutinising "friend" requests to check age suitability, ensuring pages are actively moderated by trained ABC staff and providing information to children and parents about safe online behaviours.

All third party social media pages should link back to content on abc.net.au.

## **Linking**

Links from abc.net.au sites to non-ABC websites should be appropriate and relevant to the content, suitable for the targeted age group and generally non-commercial in nature. Any links from dedicated children's spaces on abc.net.au



to sites that are designed to sell commercial products to children under 13 years should not be included.

A brief user advice notice may be required between a link and the external website stating that the user is now leaving the ABC and we are no longer responsible for the content.

There should be no direct links from ABC children's pages to third party social networking sites, even if they are to children's pages. Where an ABC page is designed for teenagers, there may be exceptions.

In general, links within children's UGC contributions will not be posted.



# Conflict of Interest Policy

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**Status:** Approved

**Document number (TRIM):** D11/I0596

**Policy issued:** 23 July 2014

**Policy Owner:**

Head Employee Relations

ABC People

82 5160

## Policy Statement

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The activities of employees, including financial, personal and political relationships, must not constitute a conflict of interest compromising the accountability, integrity, independence or impartiality of the ABC.

## Purpose of this Policy

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Ensuring effective management of conflicts of interest contributes to the ABC's strategic goal of being responsible.

To protect the independence, integrity, impartiality and high standards of the ABC and ensure effective management of conflicts of interest.

## Who it applies to

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All workers.

## Consequences of breach

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Breaches of this policy may lead to disciplinary action including possible termination of employment. A breach of this policy may also be a breach of the PGPA Act. For contractors who are found to have breached this policy, there may be consequences including termination or non-renewal of contract.

## Definitions

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**Employee:** Any person engaged by the ABC as an ongoing, fixed term, specified task or casual employee

**PGPA Act:** *Public Governance, Performance and Accountability Act 2013*

**Worker:** 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.

## Details of Policy

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### Background

Conflicts of interest are an inevitable part of organisational life and can arise intentionally or inadvertently. Given the ABC's status as the national public broadcaster and the expectations of public accountability and integrity that come with that status, it is important that the ABC and its workers take the necessary steps to effectively manage the risks associated with conflicts of interest.

The ABC's integrity and accountability can be undermined where a real, perceived or potential incompatibility exists between a person's duty as a worker within the ABC and their personal interests. A conflict of interest may arise regardless of any intention held by the worker.

This policy outlines six (6) principles which workers are expected to apply to all facets of their employment or engagement and where a sufficient connection exists, to a worker's personal interests, to avoid conflicts of interest.

For those workers involved in content making, this policy is to be read in conjunction with the Editorial Policies, however it is not intended to replace or affect any part of the Editorial Policies and the Editorial Policies prevail to the extent of any inconsistency.

## What is a conflict of interest?

A conflict of interest is a real, perceived or potential incompatibility between a worker's duty to the ABC and their personal interests. Conflicts of interest are unique to each individual job and whether a worker's political, financial, familial, or other personal interests are incompatible with their employment or engagement depends on the nature of their work. For a conflict of interest to exist there has to be a sufficient connection or relevance between the workers duties and their personal interests.

## Policy principles

There are six (6) policy principles that must be applied to all facets of a worker's employment or engagement with the ABC to avoid a real, perceived or potential conflict of interest.

A worker must:

1. Uphold the ABC's independence, integrity and high standards.
2. Understand the requirements of their role, their broader duties as a worker within the ABC and the role of the ABC within the community.
3. Carry out their duties in a careful and competent manner, to the best of their skill and ability, and in the best interests of the ABC.
4. Ensure legitimate use of their position, time and the ABC's confidential information and resources.
5. Disclose any conflict of interest, real, perceived or potential.
6. Make decisions fairly, transparently and on proper grounds.

Compliance with this policy is necessary in order for Employees to meet their obligations under the PGPA Act. Each Employee has a statutory obligation under the PGPA Act to:

- perform functions, discharge duties and exercise powers with care and diligence, in good faith, and for a proper purpose
- not improperly use their position or any information they obtain to gain an advantage for themselves or another person
- disclose any material personal interest that relates to the ABC's affairs.

## Disclosure procedures and guidelines

This policy is underpinned by [disclosure procedures](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestPRC.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestPRC.pdf>) [PDF 110 Kb] as well as a series of guidelines.

While not an exhaustive list, the guidelines listed below address some of the more common areas of conflict:

a) [External Work](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestExternalWorkINS.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestExternalWorkINS.pdf>) [PDF 140 Kb]

b) [Standing for or Holding Political or Public Office](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestStandingHoldingPoliticalPublicOfficeINS.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestStandingHoldingPoliticalPublicOfficeINS.pdf>) [PDF 116 Kb]

The guidelines provide more specific details on how the six (6) policy principles apply. Also relevant is the [Personal Use of Social Media Policy](https://intranet.abc.net.au/assets/documents/policies/editorialpolicies/PersonalUseOfSocialMediaINS.pdf) (<https://intranet.abc.net.au/assets/documents/policies/editorialpolicies/PersonalUseOfSocialMediaINS.pdf>) [PDF 360 Kb].

Workers must be familiar with and adhere to this policy, the disclosure procedures and guidelines. Failure to comply with the disclosure procedures or these guidelines constitutes a breach of the Conflict of Interest Policy.

## Related Policy Information

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### Procedures and Guidelines

- [Conflict of Interest Disclosure Procedures](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestPRC.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestPRC.pdf>) [PDF 110 Kb]
- Conflicts of Interest Guidelines: [External Work](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestExternalWorkINS.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestExternalWorkINS.pdf>) [PDF 140 Kb], [Standing for or Holding Political or Public Office](https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestStandingHoldingPoliticalPublicOfficeINS.pdf) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictofInterestStandingHoldingPoliticalPublicOfficeINS.pdf>) [PDF 116 Kb]

## Other relevant Policies and Information

- [Editorial Policies \(http://myabc.aus.aunty.abc.net.au/sitecore/service/notfound.aspx?item=web%3a%7b5FB68CF9-A78C-4FCA-85DE-AC47EA416A7A%7d%40en\)](http://myabc.aus.aunty.abc.net.au/sitecore/service/notfound.aspx?item=web%3a%7b5FB68CF9-A78C-4FCA-85DE-AC47EA416A7A%7d%40en)
- [Workplace Behaviour Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy)
- [Fraud Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy)
- [Procurement policy \(https://intranet.abc.net.au/know-the-abc/all-policies/procurement-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/procurement-policy)
- [Delegations policy \(https://intranet.abc.net.au/know-the-abc/all-policies/delegations-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/delegations-policy)
- [Workplace Values and Standards \(https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour\)](https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour) [PDF 76 Kb]
- [Public Interest Statement Form \(https://intranet.abc.net.au/assets/documents/forms/peopleandlearning/policy/PublicInterestStatementFRM.pdf\)](https://intranet.abc.net.au/assets/documents/forms/peopleandlearning/policy/PublicInterestStatementFRM.pdf) [PDF 133 Kb]

## Document History

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- Reviewed 2011 (Endorsed by PRG 16 Mar 2011; Approved by OSG 24 Mar 2011)
- Reviewed 2014 (Endorsed by PRG 29 Apr 2014; Approved by Executive 9 May 2014)
- Updated 2014 (Policy updated July 2014 to refer to the PGPA Act)

# CONFLICT OF INTEREST GUIDELINES: EXTERNAL WORK

## WHICH POLICY IS THE GUIDELINE RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	<a href="http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx">http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx</a>

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## PURPOSE OF GUIDELINE

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.

10

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.

## EXTERNAL WORK

15 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.

20 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

25 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 [Outside 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



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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**

Prior approval is not required to undertake voluntary work for charitable or social activities where there is no actual, potential or perceived conflict of interest. Prior approval is also not required if the outside work is voluntary and is an extension of the employee's role with the ABC.

Employees must always ensure, when undertaking voluntary work for charitable or social activities which is an extension of their role with the ABC 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 the Conflict of Interest Guideline on Gifts and Hospitality, once endorsed, must be followed. Until that guideline is available, guidance should be sought from the relevant manager.

### **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.

### **BREACH OF POLICY AND GUIDELINES**



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70 A failure to adhere to this Guideline constitutes a breach of the ABC's Conflict of Interest Policy, breaches of which will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment.



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<i>Current as at</i>	<i>9 June 2015</i>
<i>Next review date</i>	<i>April 2016</i>

# CONFLICT OF INTEREST DISCLOSURE PROCEDURES

## WHICH POLICY ARE THESE PROCEDURES RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	<a href="http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx">http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx</a>

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As a matter of course, 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 principles, and if in any doubt, follow the disclosure procedures below. Such assessment should include whether an employee's private interests could influence, or appear to influence, the performance of their work or the reputation of the Corporation,

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The ABC strongly encourages an open environment of disclosure and transparency. 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. We often are not the best judges of our own situation, and therefore if an employee has any doubt, it is best to discuss your situation with your manager.

15

If an employee is required to complete a Public Duty/Private Interest Statement (Statement) it is their responsibility to ensure the information contained in that Statement is accurate and current. Should their circumstances change, the employee must notify their manager immediately, and provide an updated Statement.

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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;

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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*.



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Document Number	D11/10597
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# CONFLICT OF INTEREST GUIDELINES: STANDING FOR OR HOLDING POLITICAL OR PUBLIC OFFICE

## 5 WHICH POLICY IS THE GUIDELINE RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	<a href="http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx">http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx</a>

## BACKGROUND

10 This is a guide on how employees who stand for or hold Political or Public Office satisfy their obligations to disclose and effectively manage conflicts of interest in accordance with the ABC's Conflict of Interest Policy.

15 Employees who are considering standing for, or are holding, Public or Political Office 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.

Employees who are considering standing for public office should seek their own advice regarding the possible impact of relevant electoral laws on their continued employment with the ABC.

## KEY TERMS

20 *Political Office* refers to a recognised position of duty or authority related to the governing of a municipality, state, territory, nation or political organisation.

*Public Office* refers to a position or office established by, or an appointment made under, a Commonwealth, State or Territory law or local government by-law and which requires the appointed officer to discharge a duty in the interest of the public.

## 25 STANDING FOR POLITICAL OR PUBLIC OFFICE

Whilst the ABC recognises and encourages employees to fully exercise their civic rights and responsibilities, including those of standing for or holding Political or Public Office, the ABC and



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employees must ensure that situations where the exercise of these rights and responsibilities may create a conflict of interest are effectively managed.

It is not acceptable for an employee to stand for or to hold Political or Public Office where such a situation is likely to compromise the ABC's independence or impartiality or undermine public confidence in the integrity of the ABC.

## DISCLOSURE AND MANAGEMENT OF CONFLICTS

In addition to the general disclosure procedures outlined in the Conflict of Interest Policy, the following points must be adhered to by employees who are considering nominating or standing for Political or Public Office:

- Employees intending to nominate or stand for election to a Political or Public Office must notify their manager of their intention as soon as practicable. In all cases the ABC must be notified prior to the date on which the employee's intention to stand or nominate for Political or Public Office is publicly announced, or becomes known to the public, the date of pre-selection, or the date of formal nomination in accordance with the relevant law, whichever occurs first.
- Employees who intend to nominate or stand for a Political or Public Office may be required to take leave without pay or transfer to an alternative position if their Divisional Director or Delegate determines that it is the most appropriate course of action to manage the conflict of interest. The conflict of interest presented by an ABC employee standing for Federal, State or Territory Parliament is of such a nature that the employee will be required to take leave without pay from the date of their nomination for parliament.

Regardless of whether or not an employee is successful in being elected or appointed to Political or Public Office, the Divisional Director or Delegate must undertake an assessment as to the extent, if any, of a continued conflict of interest. If, in the opinion of the Divisional Director or Delegate there is no reasonable likelihood of conflict of interest continuing to exist the employee may resume their usual duties.

If, however, the Divisional Director or Delegate believes that a conflict of interest continues to exist they will determine the most appropriate course of action. This may include transferring the employee to an alternative role, if one is available, or requiring the employee to take a period of leave without pay, in order to manage the conflict of interest.

Where a conflict of interest is of such a nature that the Divisional Director or Delegate determines that it undermines the ABC's Conflict of Interest Policy Principles and is incompatible with the employee's continued employment, the ABC may proceed to terminate the employee's employment. Alternatively, the employee may elect to resign from their employment at the ABC.

### *Employees Who Currently Hold Political or Public Office*

Any employee who currently holds Political or Public Office must ensure that their manager is notified of their office and the responsibilities of that office.



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- 75 Where an employee who holds a Political or Public Office changes positions within the ABC they must notify their new manager of the nature of the Political or Public Office that they hold. Similarly, if the nature of the Political or Public Office held by an ABC employee changes they must notify their manager of the change. It will then be necessary for the nature of their Political or Public Office to be reassessed in accordance with the Conflict of Interest Policy and this Guideline to
- 80 determine whether or not a conflict of interest exists, and if so, how it should best be managed.

#### **BREACH OF POLICY AND GUIDELINES**

A failure to adhere to this Guideline constitutes a breach of the ABC's Conflict of Interest Policy, breaches of which will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment.

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<i>Title</i>	<i>Conflict of Interest Guidelines: Standing for or Holding Political or Public Office</i>
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<i>Current as at</i>	<i>24 March 2011</i>
<i>Next review date</i>	<i>January 2013</i>

# Discrimination, Bullying and Harassment Policy

Status: Approved

Policy issued: December 2017

Policy owner: Head, Employee Relations

People & Culture

82 2855

## Policy Statement

We encourage and support positive workplace behaviours that reflect our values of integrity, respect, collegiality and innovation.

Behaviour like bullying, discrimination and harassment is clearly at odds with our values, as well as potentially breaching the law – and this will not be tolerated.

## Purpose of this Policy

This policy is to make you aware of your obligations: together with the [ABC Grievance Resolution Guidelines \[PDF 125 Kb\]](#):

- not to harass, discriminate, bully or victimise others and the consequences of such conduct; and
- when making a grievance or complaint.

For information on how to raise issues of bullying, harassment and discrimination, and information about the approach we may take to resolve these issues, see the ABC Grievance Resolution Guidelines.

## 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**).

The expectations of behaviour set out in this policy apply:

- in the workplace (including outside normal working hours),
- while undertaking work activities (including interactions with third parties and while working away from the ABC's premises),
- at work-related events (including conferences and social functions whether during or outside business hours where the interaction is with other workers,

whether in person, through email, messaging, social media and other means of communication).

## Our Commitment

We will:

- take all reasonable steps to ensure that our workplaces are free from unlawful discrimination, harassment and bullying;
- respect the right of and encourage our people to raise legitimate issues or concerns and lodge grievances or complaints in accordance with this policy and the [ABC Grievance Resolution Guidelines \[PDF 125 Kb\]](#);
- treat all grievances raised under this policy seriously;
- take appropriate action to address inappropriate workplace behaviours;
- ensure that people involved in the grievance process are not victimised.

## Your obligations

You must not engage in any behaviour which may constitute unlawful:

- bullying;
- discrimination; and
- harassment (including sexual harassment).

That behaviour will not be tolerated by the ABC. If you see inappropriate behaviour, you should raise it straight away with your manager or ABC People & Culture.

In resolving grievances, you must:

- ensure that any grievances or complaints that you raise are genuine and not false, malicious, frivolous, misconceived or vexatious,
- participate in any grievance resolution process in good faith, clearly identify the issues of the grievance and provide all relevant information in support of the grievance.

## Bullying

All of us at the ABC have a legal obligation not to bully anyone and to treat each other with respect and courtesy.

Bullying in our workplace is unacceptable and will not be tolerated.

### What is bullying?

*Workplace bullying is repeated, unreasonable behaviour directed towards a Worker or a group of Workers, which creates a risk to health and safety.*

**Repeated** refers to the persistent or ongoing nature of the behaviour and can involve a range of behaviours over time.

**Unreasonable behaviour** means behaviour that a reasonable person, having regard to all the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

The following types of behaviour, whether intentional or unintentional, may be workplace bullying if they are repeated, unreasonable and create a risk to health and safety:

- abusive, insulting or offensive language or comments;
- aggressive and intimidating conduct;
- belittling or humiliating comments;
- victimisation;
- practical jokes or initiation;
- unjustified criticism or complaints;
- threatening to expose an individual's sexuality, intersex status, or trans or gender diverse identity;
- withholding information that is vital for effective work performance;
- intentionally setting unreasonable timelines or constantly changing deadlines;
- intentionally setting tasks that are unreasonably below or beyond a person's skill level;
- denying access to information, supervision, consultation or resources to the detriment of the Worker;
- spreading misinformation or malicious rumours;
- changing work arrangements such as rosters and leave to deliberately inconvenience a particular Worker or Workers;
- speculating with colleagues about an individual's sexuality, intersex status, or trans or gender diverse identity;
- deliberately excluding someone from work-related activities.

Workplace bullying can be carried out in a variety of ways, including through verbal or physical abuse, through email, text messages, internet chat rooms, instant messaging or other social media channels.

In some cases, workplace bullying can continue outside of the workplace. It can be directed at a single Worker or a group of Workers and be carried out by one or more person.

Workplace bullying can occur upwards (i.e. directed towards a manager or supervisor), sideways (i.e. directed towards a colleague or contractor) or downwards (i.e. directed towards a subordinate or work experience participant).

### **What is not bullying?**

A single incident of unreasonable behaviour is not workplace bullying but can be raised as a workplace grievance.

Reasonable management action carried out in a reasonable manner is not workplace bullying.

The ABC may take reasonable management action to effectively direct and control the way work is carried out. It is reasonable for managers and supervisors to allocate work and give feedback on a worker's performance. These actions are not workplace bullying if they are carried out in a lawful and reasonable way, taking the particular circumstances into account.

A manager exercising legitimate authority at work may cause some discomfort for a Worker. The question of whether management action is reasonable is determined by considering the actual management action rather than a worker's perception of it. Where management action involves a significant departure from established policies or procedures, whether the departure was reasonable in the circumstances.

The following examples could be considered as reasonable management action:

- setting realistic and achievable performance goals, standards and deadlines;
- fair and appropriate rostering and allocation of working hours;
- transferring a Worker to another area or role for operational reasons;
- informing a Worker about unreasonable behaviour in an objective and confidential way;
- implementing organisational changes or restructuring;
- providing reasonable feedback as part of the performance appraisal and/or management process;
- taking disciplinary action, including suspension or terminating employment where appropriate or justified in the circumstances.

Differences of opinion and disagreements are not workplace bullying. People can have differences or disagreements in the workplace without engaging in repeated, unreasonable behaviour that creates a risk to health and safety. Some people may also take offence at action taken by management, but that does not mean that the management action in itself was unreasonable. However, in some cases conflict that is not managed may escalate to the point where it becomes workplace bullying.

## **Discrimination**

### **What is unlawful discrimination?**

Discrimination can be direct or indirect.

Direct discrimination is treating one person less favourably than another because of one of the prohibited grounds of discrimination.

In Australia, unlawful grounds include, but are not limited to:

- (a) sex;
- (b) race, colour, descent, nationality or national origin;
- (c) age;
- (d) impairment/disability;
- (e) sexual orientation;
- (f) gender identity and transgender status;



- (g) pregnancy or potential pregnancy;
- (h) marital status;
- (i) family responsibilities, responsibilities as a carer and/or parental/carer status;
- (j) religious or political beliefs; and
- (k) trade union membership or industrial activity.

An example of direct discrimination would be deciding not to employ a person because they are from a particular ethnic background.

Indirect discrimination describes a situation or condition which seems at face value to be neutral, or the same for everybody, but with which a person or group of people with an attribute (e.g. parental status, impairment, race) are unable or less able to comply because of that attribute. An example of this is a person with a disability is prevented from accessing the equipment they need to do the job because of the way the workplace is designed.

It is unlawful to discriminate on a prohibited ground even if it was unintended.

There are exceptions from anti-discrimination laws which may apply in some situations - for example, because of the inherent requirements of a particular job, an occupational qualification, where it would otherwise cause unjustifiable hardship to the employer in the case of disability or where it is necessary to comply with other laws including those relating to health and safety.

## Unlawful Harassment

### What is unlawful harassment?

*Unlawful harassment is a form of unlawful discrimination. It is any form of behaviour that is unwelcome or unwanted, that a reasonable person would have anticipated would humiliate, offend or intimidate the person exposed to the conduct and that is based on one of the grounds of unlawful discrimination (refer to 'External Authorities and Grounds of Discrimination').*

Harassment, like discrimination, can be unlawful if it is based on one of the prohibited grounds.

Unlawful harassment can include behaviour such as:

- telling offensive jokes about particular racial groups;
- making insulting comments or taunts about someone's race or religion;
- humiliating comments or actions about a person's disability, such as insults;
- working in an environment that is hostile or intimidating towards a particular sex, race, or culture;
- harassing colleagues through social networking media sites; and
- sending harassing text messages to colleagues.

While harassment generally involves a pattern of behaviour, it can also result from a single incident.

Reasonable management action, as described under bullying above, is not harassment.

## Sexual Harassment

### What is sexual harassment?

Sexual harassment occurs where a person:

- makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to another person; or
- engages in other unwelcome conduct of a sexual nature in relation to the other person,

in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated **the possibility** that the person harassed would be offended, humiliated or intimidated.

Examples of sexual harassment include:

- showing or sending obscene, suggestive or pornographic pictures, emails, text or graphics;
- asking intrusive questions or making unwelcome comments about a colleague's personal life or body, including their sex life;
- unwanted invitations to go out on dates or requests for sex;
- staring or leering; and
- behaviour that would also be an offence under criminal law such as indecent assault, sexual assault, indecent exposure, stalking or obscene communications.

Mutual attraction between people is not sexual harassment. Conduct which is welcome or consensual is not unlawful, and friendships (sexual or otherwise) which develop between people who meet at work are a private concern provided they do not adversely impact on the workplace or create a conflict of interest.

However, you should take great care before engaging in conduct you believe to be welcome. Always remember that some people may not feel comfortable telling you that your behaviour is offending them and is not welcome. This may be because of their personality or may be because of the relative status of the people involved (e.g. they are too worried about the possible impact on their employment if they complain).

It is your responsibility to ensure that you do not engage in conduct which is not welcome.

You should also remember that even conduct which is welcome may not be appropriate in the workplace. If you are unsure whether conduct is appropriate, you should speak to your manager or [People & Culture](#).

You will be liable for your own unlawful conduct. The ABC may also become liable for that conduct.

If you do not feel comfortable with someone else's behaviour, you should tell them, or if you don't feel able to do so, raise the issue with your manager or [People & Culture](#).

## How to raise a grievance

You can raise a grievance or concern about unlawful bullying, harassment and discrimination using the [ABC Grievance Resolution Guidelines \[PDF 125 Kb\]](#). The Guidelines also set out information about the approaches we may take to resolve these issues.

## Consequences of breach

Breaches of this policy may lead to disciplinary action, including possible termination of employment. In addition, legal action may be taken for certain conduct in breach of this policy.

## Related documents

This policy should be read in conjunction with the following related documents:

- [ABC Grievance Resolution Guidelines \[PDF 125 Kb\]](#)
- [ABC Workplace Complaint/ Grievance Form](#) [PDF 129 Kb]
- [ABC WHS policies](#)

## General

This policy summarises some of the rights and obligations which are created by the legislation. The policy is not intended to go beyond the legislation. If you are an employee, you should read this policy in conjunction with the applicable ABC employment agreement, but it does not form part of your contract of employment.

## Questions?

If you have any questions about this policy, your obligations or the grievance process, please [contact People & Culture](#).

## Document history

- Reviewed 2009 (Endorsed by PRG 7 Oct 2009; Approved by OSG 28 Oct 2009)
- Reviewed 2012 (Endorsed by PRG 26 Sep 2012; Approved by OSG 8 Oct 2012)
- Reviewed 2013 (Endorsed by PRG 20 Nov 2013; Approved by Executive 2 Dec 2013)
- Superseded policies - Workplace Behaviour Policy
- Reviewed November 2017 (Approved by ABC Board 30 November 2017)

- Updated January 2020 with amendments to page 3 (Approved by Head Employee Relations)



# Email and Internet Use Policy

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Status: Approved

Document number (TRIM):

Policy issued: 23 June 2015

Policy owner: Director Technology

## Policy Statement

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ABC Information, Communication and Technology (ICT) resources must be used: efficiently; primarily for ABC-related purposes; in compliance with legal and regulatory requirements; and in compliance with appropriate standards of behaviour.

## Purpose if this Policy

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The ABC is committed to being responsible and applying best practice standards of corporate governance and public accountability.

To establish the ABC's expectations regarding the responsible use of ABC email and internet resources and to ensure the continued confidentiality, integrity and availability of the ABC's information assets.

## Who it applies to

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All ABC Employees and Workplace Participants.

## Consequences of breach

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Breaches of this policy will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment. For contractors who are found to have breached this Policy, there may be consequences including termination of contract. Where inappropriate use under this Policy constitutes a breach of any law, action may also be taken in accordance with that law by the ABC or relevant third parties.

## Definitions

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Email and Internet: refers to email and internet services provided and supported by the ABC for the purpose of ABC work-related activity.

Employee: means all ABC employees, including ongoing, fixed term, specified task, probationary and casual employees.

Workplace participant: means any individual who has authorised access to ABC email and internet facilities, including Employees, actors, artists, contractors and consultants.

User: means Employees and Workplace Participants who have authorised access to Email and Internet facilities.

## Details of Policy

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### Background

Used effectively, ICT resources such as email and internet access enhance people's ability to undertake their daily working activities, communicate effectively and further the creative capital of the Corporation. Inappropriate use of these resources may expose the Corporation to a range of legal, security, privacy, confidentiality and information and workplace behaviour risks.

## General Principles

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### Surveillance

The ABC undertakes computer and camera surveillance in accordance with relevant legislation and ABC policies as amended from time to time. Information about the nature of that surveillance and how it is conducted is set out in a [Notification of Workplace Surveillance at the ABC](https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/WorkplaceSurveillance.pdf) (<https://intranet.abc.net.au/assets/documents/policies/peopleandlearning/WorkplaceSurveillance.pdf>) [PDF 503 Kb].

### Ownership of Information

Subject to any written agreement or prevailing laws to the contrary, all information and content created by Users in the course of working for or on behalf of the ABC is the property of the ABC.

### Records

All emails on ABC email accounts are automatically archived and held as a record which are monitored from time to time and, if necessary, may be recovered and used by the ABC. Subject to applicable exclusions and exemptions, access to ABC records may be granted in response to an application under the [Freedom of Information Act 1982](http://www.austlii.edu.au/au/legis/cth/consol_act/foia1982222) ([http://www.austlii.edu.au/au/legis/cth/consol\\_act/foia1982222](http://www.austlii.edu.au/au/legis/cth/consol_act/foia1982222)).

## Use of External Cloud File-Sharing Services

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All Workers who need to share content or corporate information with other Users and/or devices may only do so using the ABC Cloud File-Sharing Service. This applies to both ABC-supplied and personal devices.

The ABC File-Sharing Cloud Service provides a managed web-based cloud service and aims to address the risks associated with the use of consumer cloud services. External file-sharing cloud services must not be used for storing or sharing ABC content or information without permission from the person responsible for managing the data or creating the information. For further information refer to the Information Handling Policy or the Information Security Manager.

## Standards of acceptable conduct

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### Responsibilities

- a) All Employees and Workplace Participants have a responsibility to use Email and Internet access appropriately and effectively, as set out in this Policy;
  
- b) Use of email and internet must comply with the ABC's [Discrimination, Bullying and Other Workplace Behaviours Policy](https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy) (<https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy>).
  
- c) Each User is responsible for information sent from their ABC email account. This same principle of responsibility applies to those with delegated use of another person's email account for work purposes. Other than delegated accounts, Users must not send emails using another User's account.
  
- d) Use of Email and Internet for content-related activities must be in accordance with the [ABC Editorial Policies](http://myabc.aus.aunty.abc.net.au/sitecore/service/notfound.aspx?item=web%3a%7b5FB68CF9-A78C-4FCA-85DE-AC47EA416A7A%7d%40en) (<http://myabc.aus.aunty.abc.net.au/sitecore/service/notfound.aspx?item=web%3a%7b5FB68CF9-A78C-4FCA-85DE-AC47EA416A7A%7d%40en>) and the [Use of Social Media Policy](https://intranet.abc.net.au/know-the-abc/all-policies/social-media-policy) (<https://intranet.abc.net.au/know-the-abc/all-policies/social-media-policy>). A User must immediately notify their manager if they receive material by email which may violate this Policy.
  
- e) Fraud is not tolerated by the Corporation and individual cases of fraud are detected, reported and investigated to ensure appropriate action is taken in line with the [ABC Fraud Policy](https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy) (<https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy>).
  
- f) Any use of Email and Internet services involving or leading to any unlawful activity (including criminal activity, defamation, breaches of privacy, intellectual property or copyright laws) will be considered misuse of Email and Internet (subject to the 'Exceptions To This Policy' section below).

### Use for Personal Purposes

In line with the ABC's Social Media Policy, any personal use of Email and Internet facilities must not undermine the User's effectiveness at work, imply ABC endorsement of personal views, disclose confidential information obtained through work, or mix the personal and professional in ways likely to bring the ABC into disrepute.

Email and internet facilities are ABC resources provided to ABC Employees and Workplace Participants for the conduct of legitimate ABC business. Whilst reasonable (not unlimited) personal use of these resources is permitted, excessive personal use of Email and Internet facilities is not and may lead to disciplinary action and the removal of Email and Internet access. The ABC reserves the right to determine the scope of what is reasonable personal use.

To ensure the confidentiality, integrity and availability of the ABC's information assets, all Users must be familiar with the rules governing the use of ABC ICT systems in the Technology Security Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/technology-security-policy>), the Communications Device Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy>), and the Information Security Plan.

## **Managing ICT Resources**

The ABC encourages the use of social media platforms for the purpose of official ABC business yet also promotes the use of personal conscientiousness by all users in helping manage their own use of ICT facilities, and utilising the limited storage space of the organisation in a sustainable way.

Email and Internet facilities are a shared resource and storage space is limited. Users should limit use to essential purposes, noting that User activity is monitored, reported and may need to be justified to a responsible manager. Activities to be avoided by Users include:

- Large uploads or downloads over 50Mb, such as video or sound files, which are not being obtained for ABC business purposes;
- Sending an email to large internal or external distribution lists, unless for a purpose authorised by the responsible line manager. In preference emails should be directed to a small number of relevant people only;
  - Accessing any site that may be bandwidth intensive;
  - Use of any web-based email for any official communications;
  - Publishing their abc.net.au email account for a non-work related purpose;
  - Use of Personal Folder Files (PST) for email archival purposes, instead of the email vault being used;
  - Auto-Forwarding ABC email to a non-ABC, external email server.

## **Prohibited use of email and internet**

Users must not use the ABC's email and internet for any purpose which is unlawful or inconsistent with ABC Values or policies, including but not limited to:

### **General Misuse**

- a) To engage in any illegal activity;
- b) To access or disseminate links to any site that contains pornography, indecent or obscene material, racially offensive or discriminatory material, or any site which promotes or gives instructions for criminal activity without a clearly defined business need;
- c) To store and/or forward, and/or disseminate, download/upload and/or transmit pirated content or software;
- d) To download, upload, use or copy any software in violation of any ABC policy, license agreement or any copyright;
- e) To send any email containing confidential information concerning the ABC or any private information or any information governed by privacy laws relating to any User or any third party individual, organisation or business (other than in the course of legitimate ABC duty and to the extent it is legally permitted);



f) To download or transmit information that infringes copyright, trademarks and intellectual property of any user or any third party individual, organisation or business;

g) To knowingly create, distribute or activate a computer virus, worm, Trojan or bot, or other program designed to disrupt or cause detriment to the ABC's Technology infrastructure.

### **Behavioural Misuse**

a) To send and/or forward and/or download/upload material from email or websites that is pornographic, racist, or discriminatory;

b) For the harassment, intimidation or bullying of ABC employees; workplace participants or persons external to the ABC;

c) To forge an email message.

### **Personal Misuse**

a) In line with the ABC Fraud Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy>) and the ABC Communications Device Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy>), the ABC may determine excessive personal use constitutes fraud. Other actions to be avoided include: obtaining personal gain or profit for the user, such as by gambling, pyramid schemes;

b) Other than relevant and appropriate communications associated with trade union activities, to advance or circulate political and/or religious opinion which is not work related;

c) To create or distribute a chain mail/letter in any format, including email;

d) To create or distribute personal advertising to any individual or a list of individuals;

e) To conduct business or work activities on behalf of an organisation other than the ABC;

f) To participate in any online gaming activity which is not work related in a way which significantly undermines the effectiveness of the user at work.

g) To bring the ABC into disrepute.

### **Exceptions to this Policy**

There may be occasions when a User is required to engage in some of the prohibited use activities listed in this policy in the course of genuine ABC duty or business. When such a situation arises the user must first approach their manager with a clear written request outlining;

- the particular exception being sought;
- the time period for which the exception will be required;
- a clear justification based on business need.

The ABC advocates a common sense, cautionary approach to using email and the internet, whether in the course of official ABC business or for personal use. If a User is unsure whether an activity is prohibited, they should seek advice from their Manager. If an ABC manager approves a request for ABC business purposes which involves prohibited use, a written request must be forwarded through to the Head Technology Service Delivery and the Technology Security Manager who will undertake a security risk assessment to assess if the risk is admissible. This process is assessed on an individual case by case basis, and may be escalated at the discretion of the Executive Director/Managing Director and Legal and Business Affairs If required.

## Related Policy Information

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- [Fraud Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy)
- [Corporate Social Responsibility Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy)
- [Technology Security Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/technology-security-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/technology-security-policy)
- Information Security Plan
- [Use of Social Media Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/social-media-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/social-media-policy)
- [Communication Devices Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy)
- [Discrimination, Bullying and other Workplace Behaviours Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/discrimination-bullying-and-other-workplace-behaviour-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/discrimination-bullying-and-other-workplace-behaviour-policy)
- ABC Code of Conduct and Workplace Values

## Document History

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- Reviewed 2008 (Endorsed by PRG 26 Nov 2008; Approved by OSG 17 Dec 2008)
- Reviewed 2014 (Endorsed by PRG 19 Feb 2014; Approved by Executive 09 May 2014)
- Reviewed 2015 (Endorsed by PRG 10 June 2015; Approved by Executive 23 June 2015)



editorial  
policies

Guidance Note

# Children and Young People: Managing their Participation in Broadcast

Issued: 11 April 2011

## 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. Guidance notes provide advice to assist in the interpretation of the Editorial Policies, which contain the standards enforceable under the ABC's internal management processes and under the ABC's complaints handling procedures.

It is expected that staff will normally act in accordance with the advice contained in Guidance Notes. 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.

## Key Editorial Standards

Excerpts of key editorial standards relevant to this Guidance Note are set out below. Other editorial standards may also be relevant, depending on the specific circumstances applying in each case.

### 8 Children and young people

- 8.1 Take due care over the dignity and physical and emotional welfare of children and young people who are involved in making, participating in and presenting content produced or commissioned by the ABC.
- 8.2 Before significant participation of a child or young person in content produced or commissioned by the ABC, or in interactive services offered by the ABC, consider whether it is appropriate to obtain the consent of both the child/young person and the parent/guardian.
- 8.3 Adopt appropriate measures wherever practicable to enable children and young people, or those who supervise them, to manage risks associated with the child/young person's participation with, use of and exposure to ABC content and services designed for them.
- 8.4 Take particular care to minimise risks of exposure to unsuitable content or inappropriate contact by peers or strangers.

### 12 Commercial references

- 12.3 Take particular care to minimise commercial references in content designed for children.

## **Mandatory referral**

Where parental or guardian consent has been refused, withdrawn or is inappropriate to obtain, and the item is of sufficient public importance or the child's appearance is absolutely necessary to the content, the matter must be referred to an appropriately senior ABC person designated for the purpose, before taking any decision to proceed.

## **Scope of this guidance note**

This document provides guidance about the creation of ABC children's broadcast content and the management of children's participation in it. A separate guidance note is available on Children and Young People: Managing their Participation Online.

For the purposes of this guidance, a child or young person is an individual under the age of 18.

## **Content for children**

The ABC presents content for children of all ages. Material for young audiences is extensive and designed to reach different target groups in accordance with their needs, age and level of maturity.

In providing enjoyable, enriching and culturally relevant content for children, the ABC does not wish to conceal the real world from them. ABC content can help children make sense of the world and understand and deal with situations which may include violence and danger. Children's content should be relevant to children, rather than imposing adult concerns and expectations about children's behavioural standards.

Special care should be taken to avoid stereotypes and discrimination in content designed for children.

## **Management of commercial references**

Our audiences value the ABC's role as a non-commercial broadcaster and its non-commercial style. While the ABC acknowledges that reflecting the real world in our content may involve referring to commercial products, organisations and services, we must balance this with the need to maintain the ABC's integrity and independence as a non-commercial broadcaster.

This is particularly relevant to ABC children's content which parents appreciate as a non-commercial space for their children. Commercial references should be kept to a minimum, always be contextually relevant and not overtly frequent or prominent. The ABC should take particular care about including commercial products in content that are also highly covetable items for children, such as mobile phones, games, mp3 players etc. Should such products be required as props or set dressing, be aware of how their inclusion may influence children and ensure references don't appear to be an endorsement of a particular product or brand.

## Protection of children

The ABC has a responsibility to protect children from potential harm that might arise during their engagement with the ABC and its content. Children's interests and safety must take priority over any editorial requirements. We must ensure that children are not caused unnecessary anxiety or distress as either contributors or consumers of content.

We must balance our responsibility to protect children and young people from unsuitable content with their rights to freedom of expression. Classification and use of tailored viewer advice information assists children and parents to make decisions about the suitability of content e.g. in some situations G content may be targeted to teenage audiences rather than pre-school children.

Special care should be taken to ensure that content which children are likely to watch or access unsupervised should not be harmful or disturbing to them. Images of domestic violence and violence against children or animals may be particularly upsetting for children. Where violence is part of a story, and children can make sense of the narrative, it is less likely to upset them.

## Participation and consent

Children and young people can be involved in ABC content in a number of ways: as actors, interviewees, participants, subjects and as content makers themselves.

A child's consent to participate in content should be sought and their refusal to take part respected.

Consent of a parent or guardian is usually required before involving a child in the production of ABC content and there would need to be good reason for not seeking such consent. In the case of very young children or when the subject matter is sensitive, consent is essential. In particular children should not be asked for views on subjects likely to be beyond their capacity to answer properly without consent.

Consent may take various forms, depending on the context and the nature of the child's participation. For example, where a child is featured prominently in content, parental and child consent should take the form of a standard written release. For a child's participation in a street vox pop sequence or interview, verbal consent would be appropriate.

When filming groups of children, consideration should be given as to whether, in the circumstances, the identity of individuals should be protected.

If children are to take part in content-making during school hours, consent may be obtained from the school authorities.

Where parental or guardian consent has been refused, withdrawn or is inappropriate to obtain, and the item is of sufficient public importance or the child's appearance is absolutely necessary to the content, the matter must be referred upwards before taking any decision to proceed.



## Operating Official ABC Social Media Accounts

Issued: 29/7/2016

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### Introduction

The ABC has established an active presence on social media platforms and many staff are now responsible for publishing official content across a range of services. While the core values and editorial standards apply to social media just as much as to content on the traditional platforms, there are some particular challenges involved and some distinct procedures have been developed.

This note must be read by anyone authorised to operate or administer an official ABC social media account. It applies to all official ABC social media accounts which are established from the date this guidance note is issued and, to the extent practicable, to accounts already in operation. Divisions are encouraged to keep the accounts they administer under continuous review to ensure appropriate oversight and control measures are in place. An exit strategy should be implemented when an account no longer serves its purpose and is to be closed down.

The ABC has also issued guidance around personal use of social media, which can be found [here](#). Both personal and official use of social media fall under the scope of the ABC's [Use of Social Media Policy](#).

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### Definitions

This is what we mean by the following terms:

*Social media* Includes all social media and third party platform services intended for the use by the ABC which allow us to create, share and distribute content. This content may include different types of media such as text, audio, images, and video. Examples of social media and third party platforms include (but are not limited to) Facebook, Youtube, Twitter, Instagram, LinkedIn, Snapchat, Pinterest, Messaging Platforms including WhatsApp, Facebook Messenger and Distribution platforms like Apple News, Spotify, Soundcloud, etc.

*An official ABC social media account* is any social media account over which the ABC exercises editorial control.

Aspects of editorial control include:

- establishing the account, which must be authorised in accordance with the Editorial Policies;

- publishing content generated, produced, commissioned or acquired by the ABC;
- moderating user generated content posted on the account – whether hosted on an ABC platform or social media service, to the extent permitted by the social media service and in line with the expectations and conventions of existing users of the social media service; and
- determining if and when the account is to be modified or closed.

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## ABC Editorial Policies

All content that the ABC publishes or broadcasts via social media is subject to the [ABC Editorial Policies](#) ('EdPols'). The EdPols cover matters fundamental to the independence, integrity, impartiality and reputation of the ABC. The Principles and Standards outlined in the EdPols cover such issues as accuracy, privacy, fair and honest dealing, harm and offence and corrections and clarifications, many of which, if not all, will arise during your stewardship of an official social media account. The EdPols also include a range of Guidance Notes which explain how the Principles and Standards are applied in particular contexts. You should be especially familiar with the Guidance Notes dealing with moderating user generated content and with managing children's participation online.

It is your responsibility to ensure that you are familiar with the EdPols and are comfortable in their use.

Applying the EdPols becomes a little more complex when it comes to our accounts on social media platforms. We recognise that these services exercise a level of control over the accounts they host, and accordingly, our responsibility for content submitted or otherwise posted to these accounts is often shared with the social media service itself. As social media services evolve, the ABC needs to take a flexible approach which should be sensitive to the expectations, customs and conventions of existing users of the third-party site, and to the ABC's need to maintain its own reputation as an innovator with integrity. In Section 9 of the EdPols (Public Access and Participation), we say:

*The ABC seeks both to draw audiences to the platforms it controls and to reach audiences using suitable services that third parties control. The ABC takes editorial responsibility in proportion to its control of the media environment in which it operates. The ABC expects those who participate also to exercise responsibility for what they can control. In fostering engagement, the ABC seeks to maintain its independence and integrity, preserve trust and cultivate respect among participants.*

Section 9 covers a number of topics which are particularly relevant to social media. For example, it spells out that the ABC does not require content generated and submitted by the audience (whether individuals or organisations) to meet the standards of accuracy or impartiality required of ABC content-makers – although we always retain the right to remove it and must always



administer opportunities to participate with fairness and respect. These nuances can be challenging and you should always refer them up to your editorial manager if in doubt.

**Ask yourself:**

**If you are posting to an official social media account, ask yourself:**

- **Is this editorially justified?**
- **Would I say it on the radio or TV?**
- **Would I post it on an ABC website?**

## **Use of Social Media Policy**

The Use of Social Media Policy, which covers both official and personal use, sets out **four standards** to guide your practice of social media:

- Do not mix the professional and the personal in ways likely to bring the ABC into disrepute.
- Do not undermine your effectiveness at work.
- Do not imply ABC endorsement of your personal views.
- Do not disclose confidential information obtained through work.

The Use of Social Media Policy also provides guidance on cross-promotion of personal accounts on official ones. Essentially, personal accounts must not be listed or promoted on official ABC platforms unless editorially justified.

Examples of activity on an official account which might breach the Use of Social Media Policy include:

- directing very coarse language at an individual or posting material that racially vilifies;
- posting material from your personal account onto an official one unless the content is relevant and appropriate given the editorial purpose of the official account;
- advocating for a group or cause, or expressing a partisan view on political or controversial issues;
- when you are authorised to express personal views, suggesting these are the views of the Corporation;
- using official accounts to discuss unannounced plans to make, schedule or deliver ABC content.

Many of these activities might also breach the Editorial Policies, which require for example, that your editorial decisions are not improperly influenced by personal or political interests, that you do not imply your perspective is the editorial opinion of the ABC, and that content likely to cause harm or offence is editorially justified.

Allegations of a breach on an official account may be dealt with under either or both the Editorial Policies and the Use of Social Media Policy.

Content on official ABC social media accounts is subject to the ABC Editorial Policies and complaints may be investigated and breaches found in exactly the same way as for on-air and online content. Note, however, that comments posted on social media sites will not be regarded as formal complaints. If it appears a user wishes to make a formal complaint, you should refer them to the ABC's complaints page: <http://www.abc.net.au/contact/complain.htm>. Remember that you may be able to resolve the matter directly without it escalating to a formal complaint.

Where content posted to an official account appears to also breach one of the four standards in the Use of Social Media Policy, this may result in your manager investigating the matter with the possibility of disciplinary action being taken. Potential breaches will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment. For contractors who are found to have breached this policy, there may be consequences including termination of contract.

This investigation process is quite separate from the editorial complaints investigations conducted by the Audience and Consumer Affairs unit.

### Establishing ABC social media accounts

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Any proposal to set up an official ABC social media account or third party platform must be approved by the division's Social Media Representative with endorsement from their Division Executive member delegated for the purpose, and the Digital Network Social Media team. This process is outlined in the [Social Media Operational Guidelines document](#).

Because the ABC is editorially responsible for content posted on official social media accounts, careful consideration must be given to a range of matters before a new account is set up. To ensure consistent attention and oversight is in place across the Corporation, every new account **must go through a mandatory approval process**.

Before the ABC uploads its content to a social media site, or invites users to do the same, consideration must be given to the site's terms and conditions and whether there is a need to address legal and rights issues. Rights issues around images will arise quite frequently and you need to be alert to these. If you are unsure of whether you have the necessary rights or permissions contact the [Rights Helpdesk](#). On all other matters, ABC Legal and the ABC's Rights Management unit should be consulted as appropriate.

In almost all circumstances, you will need to establish a moderation strategy to ensure resources and processes are in place to manage user-submitted content. The information you will need can be found in the [Moderating UGC Guidance Note](#).

It should be clear to users of the social media site that they are interacting with an account, page, channel or other presence that is officially maintained by the ABC. This would typically include naming the account in line with the ABC's branding guidelines.

The following overarching principles apply:

- **Contact your social media representative before doing anything.** Contact details are available on the intranet for [Social Media Representatives](#) in each Division.
- **Get approval. Any proposal to establish an ABC social media** or third party platform profile must be approved by the divisional Social Media representative as endorsed by their Divisional Executive member and also by the Digital Network Social Media team.
- **Question what you hope to achieve.** What is to be the purpose of this account? Will you be providing the audience with additional content to that which is broadcast or published? Are you going to use it to present news updates or commentary related to your program or ABC online material? Don't establish an account just because you think your particular program/activity needs one, but try to determine whether it would add enough to be worth the additional labour. And be aware that your audience might find it confusing or problematic if the account is used to comment on subjects outside the program's or website's brief.
- **Consider the editorial implications.** Remember that the *ABC Editorial Policies* apply to content posted on official ABC social media accounts. While the ABC does not require user-generated content on social media sites to be accurate and impartial, ABC-generated content must comply with these standards. Higher standards may also apply when the ABC publishes or broadcasts user-generated content on ABC-controlled platforms (such as ABC Television or abc.net.au), in which case the accuracy of material facts may need to be checked and a diversity of perspectives presented. Consider what editorial procedures should apply. An official account also needs to have a moderation plan and comply with security procedures (such as establishing passwords).
- **Ensure appropriate security measures are in place.** Limit administration access to a small number of individuals and review admin access regularly. Have procedures in place should changes need to be made or the account closed down. Ensure that anyone administering the account has appropriate training – this might include training in how to use the particular social media platform, moderation of user-generated content, applying the Editorial Policies, and becoming familiar with legal issues relevant to the content likely to appear on the account. This may be particularly important if it is likely that children will be viewing or posting material to your site.

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### Dealing with comments and 'trolls'

At its heart, social media is all about engagement, and so it is tempting to always respond to people when they take the time and trouble to respond to a post.

But be aware that some people use social media solely to provoke, insult and offend. For the most part, their aim is to provoke a response. In rare occasions, 'trolling' can escalate into direct threats of violence and other illegal activity.

There are a range of approaches on how best to deal with trolls. Some advocate depriving them of oxygen by deleting their comments and blocking them from your account. Others take a more assertive view, engaging them in argument and retweeting offensive posts for all to see. The ABC does not have an official position on a single approach to dealing with aggressive behaviour on official sites, but would recommend in general that you should

- Be guided by the style and nature of the comments you receive.
  - Engage where people are thoughtful, businesslike and civil.
  - Avoid getting entangled in long and unconstructive exchanges with angry people.
  - Do not respond to abusive, obscene or racist comments other than through the usual moderation procedures.
  - Avoid re-tweeting trolls, even if your intention is to highlight or condemn their behaviour.
  - If you do encounter abusive behaviour, let your manager and Social Media rep know immediately, and seek their advice.
  - If threats are made against ABC property or staff, alert your editorial manager and [ABC Security](#) immediately.
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## **Conclusion**

Social media is an essential feature of the ABC's strategy for engaging more deeply with its audiences, and will only become more important in the future. The ABC expects that everyone responsible for the management of an official site will take the time to become familiar with this Guidance Note, and the Social Media Operational Guidelines document, as well as making use of any other related guidance, discussing issues with colleagues where appropriate, and referring upwards when in any doubt.

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## **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 notes 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 that 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.

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## **Key Editorial Standards**

Excerpts of key editorial standards relevant to this guidance note are set out below. Other editorial standards may also be relevant, depending on the specific circumstances applying in each case.

### **9. Public access and participation**

- 9.1** Free broadcast time or publication space may be provided to enable individuals or organisations to communicate directly with the ABC, the audience and each other, provided that:
- a** the content is broadcast or published as a public service;
  - b** the content is relevant and suitable in the context in which it appears;
  - c** the ABC maintains editorial control; and
  - d** ABC independence and integrity are maintained.
- 9.2** Opportunities to participate must be administered fairly and respectfully.
- 9.3** Do not knowingly mislead audiences about the nature of the content.
- 9.4** Clearly distinguish content generated and submitted to the ABC from content produced, commissioned or acquired by the ABC.
- 9.5** Do not accept money or other benefit in exchange for broadcasting or publishing the content generated through public access and participation.

ABC FOI 201920-061

Document 13

# GUIDELINES FOR PERSONAL USE OF SOCIAL MEDIA

## WHICH POLICY IS THE GUIDELINE RELATED TO?

Policy title	Use of Social Media Policy
Document Number	D11/22627
URL	<a href="http://about.abc.net.au/reports-publications/use-of-social-media-policy/">http://about.abc.net.au/reports-publications/use-of-social-media-policy/</a>

## THE PURPOSE OF THIS GUIDANCE NOTE

The ABC, like all contemporary media organisations, engages with and is affected by social media in a myriad of ways.

As a corporation, we operate hundreds of official social media accounts, which extend the reach of specific programs or broad content areas (such as 'Religion and Ethics') out beyond the traditional platforms. Use of these official accounts is covered by the [Editorial Policies](#) and the [Use of Social Media Policy](#). If you are considering establishing an official account, you must read the relevant guidance notes, which you can find [here](#). Note especially the guidance on [Operating Official ABC Social Media Accounts](#).

This document is specifically about another aspect of social media: the personal accounts on various platforms that almost all of us have established. We may have done so for personal purposes, for professional reasons or, as is increasingly likely, for a combination of both.

The purpose of these Guidelines is to examine those areas where your personal use of social media may intersect with your professional life and to provide some information and direction on managing the risks that may arise. This advice is not intended to unreasonably curtail your freedoms but to remind you to be conscious of your responsibility as an employee of the ABC to protect its independence and integrity.

## DEFINITIONS

This is what we mean by the following terms:

<i>Interactive service</i>	Program or application that allows users to have some input or interaction with others, often to communicate and share content with one another. Online and other interactive services include those offered on websites and through other digital platforms.
<i>Social media</i>	includes all online and other interactive services offered on ABC and third party platforms which allow us to create and share content. This content might include text (such as tweets or blogs), audio, photographs and videos. Examples of current third party social media platforms used

by the ABC include Facebook, Twitter, YouTube, Pinterest, Spotify and Instagram.

*Official ABC social media account*

Any social media account over which the ABC exercises editorial control. Aspects of editorial control include:

- establishing the account, which must be authorised in accordance with the Editorial Policies;
- publishing content generated, produced, commissioned or acquired by the ABC;
- moderating user generated content posted on the account, to the extent permitted by the third party site and in line with the expectations and conventions of existing users of the third party site; and
- determining if and when the account is to be modified or closed.

## **SOCIAL MEDIA STANDARDS**

The ABC's Use of Social Media Policy contains four short, sharp standards to guide your use of social media:

- Do not mix the professional and the personal in ways likely to bring the ABC into disrepute.
- Do not undermine your effectiveness at work.
- Do not imply ABC endorsement of your personal views.
- Do not disclose confidential information obtained through work.

This guidance provides some concrete examples of the way in which these standards apply to your personal use of social media.

## **HOW DO THESE STANDARDS APPLY TO ME?**

Your personal life is very much your own business, but you shouldn't let your activities detract from your job or damage the reputation of the ABC. As you can see from the four standards, the risks to the reputation of the ABC may come from many angles. It would almost certainly be damaging editorially for a political reporter to express a strong personal opinion on a contentious news story that they may ordinarily cover, or for a local radio producer to tweet something derogatory about the local mayor. In this way, your personal use of social media can undermine your effectiveness at work. The standards are relevant to everyone who works for the ABC, not just the content-makers. For example, it could be a breach of the Use of Social Media Policy if someone in People & Learning were to post something confidential about forthcoming redundancies, or if details of a major contract still being negotiated were to leak. There are many examples of where things could go wrong, on a sliding scale which might run all the way from 'not a good look' to 'towering inferno'.

The sliding scale also encompasses who it was who made that injudicious post, so the very first thing you should determine before setting up a personal social media account, or when thinking about an existing account, is your role within the ABC and your proximity to possible hot spots. As many of us work well away from the editorial side of the business, and away from big operational decisions involving large sums of public money, your personal risk of a damaging incident on social media may be very low. This guidance will assist you to make an informed decision.

In determining your own level of 'risk', consider the following:

- **Your broad role** (are you a presenter/content-maker/journalist/editorial manager/technologist/admin officer/UX designer/building services officer/ P&L Business Partner etc?)
- **Your specific role** (presenter of a news program/presenter of a specialist program/court reporter/producer on an arts show/online producer/policy adviser/executive member of a content division)
- **Your seniority in the organisation**, no matter the work area.
- **Your public profile** (are you well-known to regional/local/state/national audiences? Is your Twitter handle or equivalent promoted to ABC audiences on screen, on-air or online?)
- **The sort of information to which you have access** (are you privy to confidential legal or contractual dealings, do you have access to personnel records?)

If you 'map' yourself carefully, the level of discretion required, and over which topics, will become clear. If you work in Payroll for example, your personal views on education funding wouldn't (or shouldn't) affect perceptions of the ABC as an impartial news outlet, but the same views from a local radio or news presenter could well be controversial. Or, an ABC content maker might properly criticise a telco over a shoddy home line without risking the ABC's reputation, but the same opinion coming from a procurement officer involved in a telecommunications tender might raise eyebrows.

Further examples of activity which might breach one of the four social media standards – and possibly other corporate policies – include:

- an executive revealing confidential matters discussed at a strategy meeting;
- a website developer saying the ABC endorses a particular product or application;
- a presenter of children's content using very coarse language or posting lewd material;
- a member of staff, from any work area, using social media to abuse or vilify another member of staff;
- a member of staff found to be posting so incessantly on their social media account/s during work hours as to suggest there's little actual work being done.



As noted in the Use of Social Media Policy, potential breaches are dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment. For contractors who are found to have breached this policy, there may be consequences including termination of contract.

As you read the rest of this advice, keep the idea of the sliding scale in mind to determine how applicable it may be to you.

### **ESTABLISHING YOUR ACCOUNT**

When you establish your account, do not use either ABC or a program name or station call sign etc. in the actual title or handle of your account. It is fundamentally important to the people who use social media to know when they are viewing an official ABC account and when they are not.

For the same reason, do not use any of the ABC's visual identity in any way that might look official (such as in your profile pictures or cover photos). No lissajous. No Big Ted or Jemima.

You will all be aware of colleagues with account names or titles which do include some reference to the ABC. These were established in good faith during the earlier years of social media's evolution, but ABC staff should now move away from this practice for the reasons given above.

### **MAINTAINING INTEGRITY**

We each have a fundamental question to resolve when setting up a social media presence – *should I clearly declare myself as an ABC employee or not?*

If it might compromise your integrity to omit your employment from your profile or bio then we strongly recommend that you include it. If you do, it is advisable that you also add a statement to the effect that any opinions are all your own and not those of the organisation. This will make it clear that you are not speaking on behalf of the Corporation.

Social media is primarily a public enterprise, and you can be as free on it as you can in any other public activity you undertake, but if your professional reputation rests on your ability to be accurate, impartial and fair in your work, keep that foremost in your mind. To the audience, your social media musings may not be easily distinguishable from your on-air appearances, and if you start to gain a reputation online for inaccuracy, bias and unfairness, it can't help but damage your professional reputation and your ability to do your job, along with the prestige of the ABC.

These considerations really arise from the same ideas around the independence and impartiality of the ABC which underpin our [Editorial Policies](#). You might find the Guidance Note on Impartiality especially relevant when thinking about your social media presence.

Your decision to include your workplace in your profile will depend on a number of factors, including:

- The more prominent and public-facing your work at the ABC, the more likely it is that people will identify you as an employee anyway. Prominent on-air identities, senior managers who are sometimes quoted on official matters, and editorial staff involved in news, current affairs

or other information content or need to understand that they will be widely recognised as ABC people and their views, comments and activities can run a high risk of affecting the ABC's activities and their own professional standing.

- The more the particular social media activity is based on sharing views on public or controversial issues, the more ABC identification becomes an issue. If you are opening an account purely to share personal news and photos with family and friends, your employment status may not be particularly relevant or they are likely to know where you work anyway. But if setting up a profile using your full name on a fast-flowing communication platform (like Twitter) where you and those around you are sharing views and information you should think harder about appropriate disclosure. A lot of social media activity is all about genuine engagement and your followers would probably prefer to know that you work for the public broadcaster.
- Whether or not you have a significant profile, also consider the implications of cultivating sources or obtaining material to use as content via social media without making it clear that you work at the ABC. It would sit badly with our obligation to behave with integrity and the content itself could be compromised under the 'Fair and Honest dealings' section of the [EdPols](#) if individuals were misled about the nature of their participation.
- Different social media platforms have different purposes and conventions and this can influence your decisions. If you decide to join a professional platform such as LinkedIn, then clearly you would post your current and past employment details. On the other hand, participants on the forums of the Australian technology website Whirlpool often omit both their full name and their workplace.. If you were to comment there in your personal capacity (being careful not to talk about anything confidential to the ABC) you would most likely not need to add a disclosure about working here.

It is properly the job of a public broadcaster to explore controversial issues across a range of topics, including hot button issues in the community. From asylum seekers to labour market reform, gay marriage to car tariffs, Indigenous affairs to defence spending, the ABC will be there exploring the issues, presenting a diversity of perspectives and asking tough questions.

At all times, our independence and integrity will be vital, and the ABC jealously guards them. So the more controversial an issue, the more cautious ABC staff at the higher risk end of the spectrum need to be when commenting on it through social media.

So use your common sense, and stop to think before you press the button on that next post or tweet, however witty or unique it may be. Assume that the whole world might be reading, and whether it might be really better left unsaid.

#### **USING A PERSONAL ACCOUNT FOR REPORTING**

Journalists are increasingly active on social media platforms like Twitter, using them to build profile, research stories, establish contacts and share information.

They increasingly use them to break stories, to be first with the news.

Because of the growing strength of social media as a news platform, ABC reporters will often live tweet breaking stories. However, the ABC will not publish these as official ABC content on ABC platforms until any necessary verification or other checks are carried out. In many cases, News may then share, link to or publish those tweets.

ABC News has protocols in place to ensure that, wherever possible, news is broken via official ABC platforms and official ABC social media accounts. Where reporters use their own accounts, they should do so simultaneously with official accounts or breaking news alerts, so the information can be verified and published with the full authority and reputation of the ABC behind it.

Despite this, reporters must be aware that their personal tweets remain exactly that and they must take responsibility for them. The ABC does not take responsibility (including editorial responsibility) for material posted by an individual on their personal social media account.

However, the ABC does undertake to provide necessary training and the rolling development of appropriate protocols and procedures to offer as much protection as possible to staff working in this area.

## **COMMENTING ON OTHERS**

LinkedIn asks you to 'endorse' your peers for their skills and attributes, Facebook invites you to 'like' people, Pinterest encourages you to 'pin' your favourite things and Twitter encourages you to 'retweet' the views of others.

In many cases, such activity does not necessarily amount to an indication of approval. Twitter in particular has an oft-stated and broadly accepted understanding that a retweet is not necessarily an endorsement.

But be aware that when you comment on, share or criticise the views or images of others you are helping others to form a view of you. There are even sophisticated social media measurement tools that can track how often you share certain kinds of views or information, and assess you on that basis. If you are a content-maker who consistently re-posts or retweets material with particular perspectives on a contentious issue, it may begin to suggest a partisan approach and compromise your credibility.

Often reporters and other content-makers have to 'like' or 'join' an individual or organisation on social media to get access to information. You might even extend or accept friend requests on some platforms for reporting purposes and decide to follow politicians and other sources on Twitter. One solution to this is to be careful to make this kind of contact with a robust range of people with a range of views on contentious matters.

## SHARING PERSONAL INFORMATION

Different social media platforms have different privacy settings. Some of them are more effective than others, but, as a general rule, it is usually sensible to assume that information shared through social media could potentially become public to a wide audience.

So take care with those candid photographs, the phone numbers, contact details, financial information and other personal data.

In particular, when it comes to mixing the personal and professional, be aware that (for example) using as your profile picture a group photograph taken at an ABC function at Happy Al's Corner Bar may be intensely amusing for you, but less so for any colleagues who may be visible in the shot. In general, you should always ask permission from either colleagues or managers before posting images or other personal information that you've collected in the workplace.

## DEALING WITH COMMENTS AND 'TROLLS'

At its heart, social media is all about engagement, and so it is tempting to always respond to people when they take the time and trouble to contact you directly.

But be aware that some people use social media solely to provoke, insult and offend. For the most part, their aim is to provoke a response. In rare occasions, 'trolling' can escalate into direct threats of violence and other illegal activity.

You are probably aware that there are conflicting theories on how best to deal with trolls. Some advocate depriving them of oxygen by deleting their comments and blocking them from your account. Others take a more assertive view, engaging them in argument and retweeting offensive posts for all to see. It's not the business of the ABC to recommend one approach over another, but as ever, if your personal account becomes targeted by somebody on an issue which concerns the ABC, especially an editorial matter, we would ask that you please alert your manager and talk to your divisional social media representative for expert advice. If you feel unsafe, you should speak to your manager or approach ABC security for assistance.

## ANONYMOUS, FAKE OR SATIRICAL ACCOUNTS

Anonymous accounts -- which can be parody accounts based on real people -- are a feature of social media. There are two issues with these for the ABC.

- Content-makers deciding to set up fake accounts for programming purposes. There are many possible reasons why these might be set up, which may range from investigative reporting to comedy or pranking. These should be considered within the principles laid down in the 'Fair and Honest Dealing' section of the [Editorial Policies](#) and must always be referred to the appropriate senior manager before they are established. Regard should also be given to the social media sites' terms and conditions, which may prohibit such accounts from being established.
- Individual members of staff establishing personal anonymous, pseudonymous, satirical or fake accounts. As ever, please consider how this might affect your role at the ABC before

embarking on this course, whatever your motivation, should your real identity become known. If there is nothing likely to undermine your ability to do your work and you are not disclosing confidential information gained through your position or otherwise in risk of breaching the other social media standards, then this is not a matter of concern to the ABC. But the higher your profile and association with editorial or managerial affairs, the greater the risk of adverse consequences should your identity be revealed .

## **CONCLUSION**

Social media is one of the greatest and most fascinating shifts of our generation, and we are all still grappling with its implications. In this guidance we have attempted to identify some of the potential friction points between your personal and professional identities online and have provided references to a number of ABC policies which you may find useful. You might also want to look at the [ABC Values](#), the [Workplace Behaviour Policy](#), and the [Email and Internet Use Policy](#) (*internal links for staff*) for further advice, and please feel free to talk to the [Social Media representative for your division](#) (*internal link*) if you have any further questions.



# Social Media Policy

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Status: Approved

Document Number (TRIM): D11/22627

Policy issued: 2 Sep 2015

Policy owner:

## Policy Statement

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Personal and professional use of social media by ABC staff and contractors must not bring the ABC into disrepute, compromise effectiveness at work, imply ABC endorsement of personal views or disclose, without authorisation, confidential information.

## Purpose of this Policy

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Encouraging staff and contractors to actively engage with social media while being clear who is responsible for personal and professional uses.

The policy encourages staff and contractors to take responsibility for their activity, aims to make it clear when the ABC Editorial Policies do and do not apply, and reinforces and augments principles set out in related policies governing work-related activities.

This policy should be read in conjunction with the [ABC Editorial Policies \(https://edpols.abc.net.au/\)](https://edpols.abc.net.au/) and corporate policies including the [Conflict of Interest Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy), [Independent Contractors' Policy, \(https://intranet.abc.net.au/know-the-abc/all-policies/independent-contractor-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/independent-contractor-policy) [Email and Internet Use Policy, Communication Devices Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy), [ABC Values and Standards \(http://myabc.aus.aunty.abc.net.au/Your-employment/Policies-forms-and-organisational-charts/Policies-and-Guidelines/ABC-Values-and-Standards-of-Workplace-Behaviour.aspx\)](http://myabc.aus.aunty.abc.net.au/Your-employment/Policies-forms-and-organisational-charts/Policies-and-Guidelines/ABC-Values-and-Standards-of-Workplace-Behaviour.aspx) [PDF 76 Kb], [Corporate Responsibility Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy) and the [Disscrimination, Bullying and other Workplace Behaviours Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour\)](https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour).

## Who it applies to

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All workers

## Consequences of breach

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Breach of this policy will be dealt with in accordance with the relevant ABC employment agreement and may lead to disciplinary action including possible termination of employment. For contractors who are found to have breached this policy, there may be consequences including termination of contract. Where inappropriate use under this policy constitutes a breach of any law, action may also be taken in accordance with that law by the ABC or concerned third parties.

## Definitions

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**Worker:** 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.

## Introduction

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Interactive services, which include social media like Facebook, YouTube and Twitter, are part of the ABC's future as a public broadcaster and increasingly part of the work and private lives of workers.

The ABC encourages use of social media to engage existing and new audiences with ABC content, and to seek and share user-generated content. Use of social media by workers is not limited to the workplace and occurs for professional or personal purposes both in and out of work hours.

## Standards

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The following four standards apply to work and personal use of interactive services by workers using both ABC accounts and personal accounts at any time:

1. Do not mix the professional and the personal in ways likely to bring the ABC into disrepute.
2. Do not undermine your effectiveness at work.
3. Do not imply ABC endorsement of your personal views.
4. Do not disclose confidential information obtained through work.

The ABC will enforce the four standards as and when appropriate.

## Responsibility

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The ABC is responsible under the [ABC Editorial Policies \(https://edpols.abc.net.au/\)](https://edpols.abc.net.au/) for content posted on official ABC accounts. The ABC takes editorial responsibility in proportion to its control of the media environment in which it operates and expects those who participate also to exercise responsibility over what they can control – see ABC Editorial Policies section 9 (Public access and participation.)

Official ABC accounts are those over which the ABC exercises editorial control. Aspects of editorial control include:

- establishing the account, which must be authorised in accordance with the Editorial Policies – see the Editorial Policies Guidance Note on ‘Moderating User Generated Content’;
- publishing content generated, produced, commissioned or acquired by the ABC;
- moderating user generated content posted on the account, to the extent permitted by the third party site and in line with the expectations and conventions of existing users of the third party site – see Editorial Policies section 9 (Public access and participation) and the ‘Moderating User Generated Content’ Guidance Note; and
- determining if and when the account is to be modified or closed.

Official ABC accounts may be listed and cross-promoted on ABC platforms. Personal accounts may not be listed or cross-promoted on ABC platforms unless editorially justified. Note, editorial references to personal accounts will not mean the ABC takes editorial responsibility for the content on those accounts, just as the ABC does not become editorially responsible for the content posted on external websites simply by virtue of referring to those sites in ABC content.

If a complaint is received about content on an official ABC account, the ABC accepts editorial responsibility and the Editorial Policies apply. If a complaint is received about content on a personal account, the ABC does not accept editorial responsibility and the Editorial Policies do not apply.

Workers are responsible for the content they post on their personal social media accounts. Where a worker's personal use of social media contravenes one of the four standards (above), then it may be appropriate for the ABC to respond.

## Related Policy Information

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### Procedures and Guidelines

- [Moderating User Generated Content Guidance Note \(http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/~media/Documents/EditorialPoliciesAndGuidelines/UGCCComplianceCKLpdf.ashx\)](http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/~media/Documents/EditorialPoliciesAndGuidelines/UGCCComplianceCKLpdf.ashx) [PDF 123 Kb]

### Other relevant Policies and Information

- [ABC Editorial Policies \(https://edpols.abc.net.au/\)](https://edpols.abc.net.au/)
- [Conflict of Interest Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy)
- [Independent Contractors’ Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/independent-contractor-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/independent-contractor-policy)
- [Email and Internet Use Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/email-and-internet-use-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/email-and-internet-use-policy) [PDF 207 Kb]
- [Communication Devices Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/communication-devices-policy)



- [ABC Workplace Values and Code of Conduct \(https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour\)](https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour) [PDF 171 Kb]
- [Discrimination, Bullying and other Workplace Behaviours Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/discrimination,-bullying-and-other-workplace-behaviour-policy)
- [Corporate Responsibility Policy \(https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy\)](https://intranet.abc.net.au/know-the-abc/all-policies/corporate-responsibility-policy)

## Document History

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- Reviewed 2009 (Endorsed by PRG Oct 2009; Approved by Executive 5 Nov 2009)
- Reviewed 2011 (Endorsed by PRG 21 Sep 2011; Approved by Executive 27 Sep 2011)
- Reviewed 2015 (Endorsed by PRG 13 Aug 2015; Approved by Executive 2 Sep 2015)



# ABC Values & Standards of Workplace Behaviour

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ABC employees are expected to demonstrate ABC Values and to conduct themselves in accordance with specified standards of behaviour. Those Values and Standards are outlined below. ABC employees must also comply with ABC policies.

## Values

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The ABC is an independent media organisation providing broadcasting and digital media services within and outside Australia.

Our Values are the foundation of our work. ABC employees are expected to demonstrate the following ABC Values:

### Integrity

We act with trustworthiness, honesty and fairness. We deliver on our commitments and are accountable.

### Respect

We treat our audiences and each other with consideration and dignity. We embrace diversity.

### Collegiality

We work together willingly. We cooperate and share in the ABC's challenges and successes.

### Innovation

We foster creativity and distinctiveness. We encourage new thinking and strive to achieve quality in all that we do.

## Standards

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ABC employees must:

1. demonstrate ABC Values in all aspects of work
2. work and act with professionalism, care and diligence
3. comply with any lawful and reasonable direction given by a person in the ABC who has authority to give such a direction

4. treat colleagues and the public with respect and courtesy
5. demonstrate ethical behaviour consistent with the best interests and good name of the ABC
6. act in good faith, for a proper purpose and only use ABC resources and information for legitimate ABC purposes
7. advise the ABC of criminal charge or conviction which is related to or impacts on the employee's ability to perform the inherent requirements of their job
8. meet appropriate standards of personal hygiene and appearance and dress appropriately for the workplace and the tasks to be undertaken on any particular day
9. comply with all relevant legal and administrative requirements, including ABC Policies and Procedures.

Conduct or behaviour which does not meet these standards may constitute misconduct (including serious misconduct) and lead to disciplinary action, including termination of employment.



# Work Health, Safety & Wellbeing Policy

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Safety matters - we believe health, safety and wellbeing are critical to our success and should be the foundation of everything we do.

The ABC will provide and maintain a safe and healthy workplace for workers, contractors, partner organisations and visitors.

Working together we can prevent all workplace injuries and illnesses and make sure everyone goes home safe and well at the end of each day.

## Our commitment to you

We will comply with all Work Health & Safety legislation and obligations and we will always endeavor to:

- Provide safe workplaces, safe plant and equipment, and safe work practices;
- Proactively apply risk management techniques to systematically eliminate or control risks to health, safety & wellbeing;
- Set measurable objectives and targets, and allocate the necessary resources required to continually improve our work health & safety performance and systems;
- Provide appropriate instruction, training, information and supervision to all workers;
- Provide appropriate planning, procurement, design, monitoring, and maintenance of our systems, processes, plant, equipment, and workplaces;
- Foster a culture of health, safety & wellbeing through open and honest communication, consultation, engagement, and cooperation;

ABC Management is responsible for the effective communication and implementation of this policy, and will be held accountable at every level for the health, safety & wellbeing outcomes within their area of responsibility.

## Your obligations

All workers, contractors, visitors, and partner organisation are expected to comply with this policy by following safe systems of work, reporting health & safety issues, participating in safety initiatives and training, and by taking all reasonable care to prevent injury to themselves and others. Failure to comply with your obligations under this policy may result in disciplinary action up to and including termination of your employment.

## Scope

This policy applies to all ABC workers, contractors, partner organisations, and visitors, and to all ABC activities, workplaces, and sites.

David Anderson Date: 3 September 2019

Managing Director

To view the PDF version of the WHS Policy click here (<https://intranet.abc.net.au/know-the-abc/all->





# Corporate Responsibility Policy

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**Status:** Approved

**Document Number (TRIM):**

**Policy issued:** 11 August 2014

**Policy owner:**

Head Corporate Governance

Corporate Affairs

82 5316

## Policy Statement

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The ABC is committed to being a responsible corporate citizen, and to acting ethically and responsibly in all areas of its operations. Corporate responsibility refers to the ABC's commitment to recognise and manage the social and environmental impacts of its corporate and business activities, and to maintain a governance structure that supports this commitment.

## Purpose of this Policy

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To identify the principles and practices for the ABC to establish and maintain a culture of corporate responsibility which supports a positive overall impact on the corporation and society more broadly.

Being responsible is expressed as one of six goals in the ABC Strategic Plan 2013-16. This includes being a responsible corporate citizen..

## Who it applies to

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All Workers.

## Scope

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This policy does not apply to:

- Editorial decision making (including decisions relating to sponsorship, fundraising, connection with charities, event participation, academic or research initiatives undertaken as part of content making). Those activities are regulated by the *ABC Editorial Policies* and associated guidelines.
- personal activities, such as an employee's decision to participate in the ABC Workplace Giving program.

## Consequences of breach

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Breaches of this policy may result in reputational damage, or possible breaches of the ABC's statutory obligations (for instance, under the *Australian Broadcasting Corporation Act 1983*).

For employees, in some cases it may be appropriate for a breach of this policy to be dealt with in accordance with the relevant ABC enterprise agreement and may lead to disciplinary action including possible termination of employment.

For contractors, a breach will be dealt with in accordance with the relevant contractual provisions and may result in termination of contract.

## Definitions

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**Workers:** 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.

**Sustainability:** The interdependence of economic, social and environmental factors in the long-term viability of the organisation.

## Details of Policy

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### Corporate Responsibility Principles

The ABC seeks to apply the following principles to its corporate and business activities:

#### 1. Integrity (Corporate governance, law and standards)

- Operate ethically and with integrity. This means complying with legal obligations (including the *Australian Broadcasting Corporation Act 1983*), applying clear and high standards of corporate governance, upholding ABC Values, and complying with ABC policies and procedures.
- Strive to achieve the highest ethical standards in all activities.

#### 2. Respect (Human rights)

- Respect fundamental human rights and the dignity of people in all corporate and business activities. This means operating with cultural sensitivity and actively pursuing equal opportunity, equality and diversity irrespective of race, colour, ethnic or national origins, gender, sexuality, marital status, disability, social background, political opinion and religious belief.
- Take reasonable steps to ensure that processes reflect principles of fairness and natural justice.

#### 3. Trust (Accountability and transparency)

- Be accountable and transparent and report performance as appropriate using internationally recognised frameworks.
- Work towards integrating corporate responsibility and sustainability principles to guide decision-making and business activity, for instance through the Strategic Plan and Divisional Business Plans.

#### **4. Interdependence and Collegiality (Stakeholders)**

- Build understanding about the direct and indirect impact of ABC operations, both inside and outside the Corporation, and continuously strive to improve how those impacts are managed.
- Within reasonable financial and practical limits, work with current and future suppliers on ways to improve the ABC's environmental and social impact.
- Provide access to suitable training and development opportunities as appropriate for ABC employees to build their knowledge, skills and capability, and promote a safe working environment that supports health and wellbeing.

#### **Internal Corporate Responsibility Activities**

The ABC aims to implement systems and processes to ensure that it is continuously improving performance in relation to:

- environmental responsibility (including energy consumption, emissions, waste and recycling, and water consumption)
- product responsibility (including having regard to the supply chain and consumers)
- financial sustainability (including responsible financial management and efficiency)
- employment responsibility (including health and safety, diversity and wellbeing)
- social responsibility (including public policy, protecting against fraud and corruption).

#### **External Corporate Responsibility Activities**

The ABC is frequently invited to participate in corporate and community events and activities, or to become a partner in academic research projects. Similarly, there may be circumstances when it is appropriate for the ABC to initiate a relationship with an organisation in the corporate, community or academic sector. Participating in those events or activities may be consistent with the ABC's corporate responsibility commitment.

The decision to accept an invitation or engage with a third party must be made carefully and not bring the ABC into disrepute. This means having regard to the ABC's Charter obligations, legislative confines (in particular those in the ABC Act), budget limitations and ABC Values. Any activity which has potential editorial implications must be referred to the relevant editorial manager or Head Editorial Policies.

The [Procedures for Participating in an External Corporate Responsibility Activity](https://intranet.abc.net.au/assets/documents/policies/corporatestrategyandmarketing/ParticipationInExternalCSRActivitiesPRC.pdf).

(<https://intranet.abc.net.au/assets/documents/policies/corporatestrategyandmarketing/ParticipationInExternalCSRActivitiesPRC.pdf>). [PDF 139 Kb] provide guidance on participating in the following activities:

- sponsorship



- fundraising
- connection with charities
- event participation
- academic/research initiatives.

## Related Policy Information

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- Procedures for Participating in External Corporate Responsibility Activities (<https://intranet.abc.net.au/assets/documents/policies/corporatestrategyandmarketing/ParticipationInExternalCSRActivitiesPRC.pdf>). [PDF 139 Kb]
- ABC Privacy Policy (<https://intranet.abc.net.au/privacy-statement>).
- Risk Management Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/risk-management-policy>).
- Conflict of Interest Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy>).
- Indigenous Cultural Protocols at ABC Events (<https://intranet.abc.net.au/know-the-abc/all-policies/indigenous-cultural-protocols-at-abc-events>).
- Fraud Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/fraud-policy>).
- Whistleblower Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/whistleblower-policy>).
- Procurement Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/procurement-policy>).
- Emergency Broadcasting Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/emergency-broadcasting-policy>).
- Environmental Management Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/environmental-policy>).
- Health and Safety Policies
- Discrimination, Bullying and other Workplace Behaviours Policy (<https://intranet.abc.net.au/know-the-abc/all-policies/discrimination-bullying-and-other-workplace-behaviour-policy>).

## Document History

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- Reviewed 2010 (Endorsed by PRG 17 Nov 2010; Approved by Executive 19 Apr 2011)
- Reviewed 2014 (Endorsed by PRG 23 Jul 2014; Approved by Executive 11 Aug 2014)