

EXTERNAL WORK AND EDITORIAL CONFLICTS

Scope of this Guidance Note

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

It does not cover non-editorial conflicts of interest associated with external work by ABC workers, or other editorial conflicts not associated with external work.

Who is covered by this guidance note?

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

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

KEY EDITORIAL STANDARDS

- 1.1** Maintain the independence and integrity of the ABC.
- 1.2** Exercise ABC editorial control over the content the ABC broadcasts or publishes.
- 1.3** Ensure that editorial decisions are not improperly influenced by political, sectional, commercial or personal interests.
- 1.4** External activities of individuals undertaking work for the ABC must not undermine the independence and integrity of the ABC's editorial content.

Introduction

The ABC has a corporate policy on [Conflict of Interest](http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/Conflict-of-Interest-Policy.aspx) (<http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/Conflict-of-Interest-Policy.aspx>). This policy sets out 6 core principles:

Uphold the ABC's independence, integrity and high standards.

Understand the requirements of their role, their broader duties as a worker within the ABC and the role of the ABC within the community.

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.

Ensure legitimate use of their position, time and the ABC's confidential information and resources.

Disclose any conflict of interest, real, perceived or potential.

Make decisions fairly, transparently and on proper grounds.

In addition to this over-arching policy, the ABC also has specific guidelines on how to manage conflicts in relation to external work. ([http://myabc.aus.aunty.abc.net.au/How-to/All-](http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/~media/Documents/HowTo/PeopleAndLearning/PALGuidelines/ConflictOfInterestExternalWorkINSpdf.ashx)

[Policies/~media/Documents/HowTo/PeopleAndLearning/PALGuidelines/ConflictOfInterestExternalWorkINSpdf.ashx](http://myabc.aus.aunty.abc.net.au/How-to/All-Policies/~media/Documents/HowTo/PeopleAndLearning/PALGuidelines/ConflictOfInterestExternalWorkINSpdf.ashx)).

These policies, guidelines and principles cover a range of real, perceived or potential conflicts, many of which have nothing to do with editorial policies (for example, an ABC employee participating in a tender process for a new software system who might have connections to one of the tendering companies).

For *all* external work, you must follow these broad guidelines and obtain approval from your manager.

This editorial guidance note will assist in the process by dealing specifically with the editorial conflicts of interest caused by external work and setting out ways to avoid, minimise or declare them.

WHAT IS “EXTERNAL WORK”?

For the purposes of this guidance note, external work is any work, **paid or unpaid**, that you conduct for other organisations or on a self-employed basis, including (for example):

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

It does *not* include personal social media activities, which are covered by the ABC's Social Media Policy. (<http://myabc/How-to/All-Policies/Social-Media-Policy.aspx>) and guidelines (<http://myabc/Divisions/Editorial-Policies/~media/Documents/Policies/EditorialPolicies/PersonalUseOfSocialMediaINSpdf.ashx>), unless that activity is part of a work arrangement (e.g. live-tweeting an event for promotional purposes or engaging in “cash-for-tweet” style arrangements)

What is a conflict of interest?

A conflict of interest is where your non-ABC interest, such as a commercial, personal or political activity, competes with your ABC interest, i.e. your ABC work. Managing conflicts of interest is critical to your reputation and the reputation of the ABC. If these interests are not well managed they can damage your editorial integrity and the independence and integrity of the ABC.

What types of conflict of interest ARE THERE?

Real conflict of interest

This is where the performance of your ABC work and work outside the ABC come into direct conflict.

Example: as well as working at the ABC as a producer, you are the secretary of the RSPCA. Your executive producer asks you to develop a story about animal welfare which will include researching or investigating the RSPCA over concerns with one of their animal shelters. These two interests: one ABC, one non-ABC are now in conflict, because you cannot be both an independent, impartial observer negotiating with the RSPCA and, at the same time, a representative of the RSPCA.

Potential conflict of interest

This is where the performance of your ABC work and work outside the ABC could come into conflict in the future or through a likely change of circumstances.

Example: as well as working at the ABC as a court reporter, you are on the board of a local child care centre. If a dispute about the centre wound up in court, it is likely that you may have some role in covering the story. You do not yet have a real conflict, but you have a potential conflict which may arise in the future. This may not preclude you from accepting the outside commitment in the first place, but at the very least it would require upward referral and discussion, as well as monitoring and perhaps reconsidering the situation if circumstances change.

Perceived conflict of interest

This is where there is a perception by others that there is, or could be, a conflict of interest between your ABC work and your external work.

Example: as well as working at the ABC as a producer on a factual or current affairs program, you are the secretary of a local political party. Your work does not involve producing content that is political or specifically about that party so there is not necessarily a real or direct conflict of interest, but others may perceive there is a conflict. Simple membership of a political party may not lead to a significant perception of conflict, but the more active and public the party link, the higher the risk.

THE RISKS

The fundamental editorial risk associated with any external work is that it will undermine your professional integrity, the ABC's editorial integrity, or both.

At the heart of this concept of integrity is *independence*. The trust and respect of the community depend on the ABC's commitment to editorial independence and integrity.

That can be undermined if individuals working for the ABC are also undertaking other work externally which casts a shadow on that independence and integrity.

Some of the risks involved are obvious to anyone.

For example, an ABC political reporter could not undertake external work writing speeches for politicians or working directly for a political party. Such external work would immediately create an impossible conflict of interest.

Similarly, a radio or television program maker involved in a documentary critically examining the solar energy industry could not also be employed by a company selling solar panels.

But most other risks are more subtle.

For example, a presenter who regularly interviews public figures on his/her ABC program might consider accepting external work interviewing a senior business figure as part of a public forum on economic matters organised by the business figure's own company or professional organisation. That may well cause a real or perceived conflict if and when the presenter needs to interview that same person for the ABC.

Similarly, an ABC presenter might be offered a paid external job to run a discussion panel at a conference organised by, for example, an environmental organisation. This could lead to a conflict or the perception of a conflict if and when that same presenter covers environmental issues.

A regional journalist or program maker might be asked to join the board of a local community organisation, only to later find themselves having to cover allegations of fraud or misconduct within that same organisation.

In all cases, the problem is the same – external work has created a conflict (whether real or perceived) that has the potential to undermine editorial integrity.

The solution is to discuss the editorial implications with your manager when seeking approval for the work, and use the process outlined below to resolve the matter. Some conflicts are manageable if they are declared, some will require special conditions or changes to be made and some will simply be rejected as creating too much real or potential damage.

RISK ASSESSMENT

This section gives guidance on assessing the level of risk associated with particular circumstances. Different situations are given a rating of extremely high risk, high risk, moderate risk and low risk. It also recognises that there are genuine benefits accrued to both the ABC and to individuals in doing external work and engaging with the community. These ratings should not be used in isolation. Generally, if a situation is extremely high risk, or high risk in more than one category, the presumption will be that the request will not be approved.

It is important to realise that a rating of high risk does not necessarily mean that a particular request for external work will not be approved.

• What is the role of the worker at the ABC?

This is first and most important consideration. The potential for the perception or reality of compromising the ABC's editorial independence varies according to the role that person has at the ABC. It is recognised that ABC staff have a right to participate in the social and political life of their country. However, by accepting a position at the ABC, content-makers must accept that brings with it constraints on their freedom to publicly advocate or be associated with particular perspectives on controversial and contentious issues.

A key factor in this risk category is proximity to the ABC. Risk levels will differ for employees, contractors, actors, presenters, co-producers, and employees/contractors of co-producers. (In some cases, such as actors, the ABC has no wish to restrict outside activities, nor is it permitted to do so.) Nonetheless, high profile presenters are often seen

as faces or voices of the ABC regardless of whether they work directly for us or are contracted to a co-production company.

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

High profile on-air presenters, reporters and editorial leaders are most closely associated with the ABC. Their involvement in outside work is **very high risk**.

Any other person involved full-time in creating, managing, editing, curating or moderating content for factual or news and current affairs program and platforms is **high risk**. This includes radio presenters, for instance.

Regular part-time contributors with an ongoing relationship creating content for the ABC are **moderate to high risk**.

Any other staff who may be involved in editorial decision-making are **moderate risk**.

Occasional contributors and contractors are **low risk**.

Other staff not directly involved in content making or editorial decision-making are **low risk**.

- **What is the nature of the work being performed?**

Does the work imply support for any particular perspective on a contentious issue or support for any person or organisation involved in public debate on contentious issue[s] or assist such a person or organisation manage contentious issues?

Consulting or advising companies or organisations on media management e.g. media training or preparing publicity material is **extremely high risk**.

Commenting directly on a public debate through writing comment articles, participating in debates, speaking at rallies or forums is **high risk**.

Work that relates directly to work done – or likely to be done – at the ABC is **high risk** (*for example, working for a company or industry you are also directly reporting on as an ABC journalist*).

Moderating debates and discussions on contentious issues or for high risk organisations [see below] is **moderate risk**.

Work in support of charities, public health campaigns, local community organisations is **low to moderate risk**.

- **What is the editorial/political content of the work?**

Any work that involves expressing a personal opinion on or implicitly endorsing a perspective on a current contentious political or social debate is **extremely high risk**.

Any work that involves endorsing a commercial product or service is **extremely high risk**.

External work that involves journalistic analysis of current contentious political or social issues is **moderate risk**.

External work with little or no requirement for analysis or commentary on current issues is **low risk**.

- **Who is the work for?**

The nature of the organisation that the work is being done for has a strong impact on the perception of independence. This is an additional consideration to whether the organisation is one which you are likely to report on or otherwise deal with in your ABC role; see above under '*2. What is the nature of the work being performed?*'.

Any work for political parties is **extremely high risk** and is unlikely to be approved except in exceptional circumstances.

Work for lobby groups, campaign organisations, unions and large public companies is **high risk**.

Think tanks, activist NGOs, low profile companies are **moderate to high risk**, depending on how controversial or politically partisan an organisation is or is perceived to be.

Universities, schools, cultural events, charities and other non-political or non-partisan NGOs are **low risk**.

- **Benefits and Remuneration**

The amount of money received or the scale of fringe benefits will have an impact on the perception of independence. The larger the amount of money the greater the risk of potential compromise

How much money: token payment (\$1 – \$500) **low risk**; moderate payment (\$500 – \$5,000) **moderate risk**; large payment >\$5,000k **high risk**.

Regular payments and ongoing relationships are **high risk**.

- **Public benefit and benefit to the ABC and/or the individual ABC worker.**

Clearly there can be significant benefits to the individual carrying out the work, to the ABC and to the broader community. Appropriate external work can build the reputation, contacts and experience of the worker, it can increase the ABC's visibility and reputation in the community and it can assist in promoting civic debate, community cohesion and the free flow of information.

In the same way that risks accumulate, so do benefits. While receiving remuneration adds to the risk of external work it is also a legitimate benefit to the individual; similarly moderating a public discussion of contentious issues at a think tank may create a risk of perceived association with a particular political point of view, it also may contribute to public debate and discussion, which is a community benefit. Convening community events and working for charities may also have risks attached but there is potentially benefit derived from community engagement for both the ABC and for the communities themselves.

Quantifying the risk

Quantifying the risk can only ever be approximate but it may give assistance in working out whether a request is easily approved or not. As a general guide, a total risk rating of around -15 or higher is likely to result in the activity not being approved.

No risk = 0

Low risk = -1

Moderate risk = -2/3

High risk = -4

Very high risk = -5

Extremely high risk = -10

Quantifying the benefit

Quantifying the benefit of external work is perhaps harder than quantifying the risks. Each of the following factors should be given a roughly equal rating as moderate benefits that balance risk:

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

Example: a high profile on-air presenter moderating a forum on education policy for the IPA or moderating a forum on carbon pricing for the Australia Institute

Risk category	Rating
Nature of the work	3
Content of the work	3
Role of the worker	5
Type of organisation	3
Remuneration	0
Public benefit	-2
Total	12

This would be a marginal case – the nature and content of the work is only moderately risky, but the combination of the high profile of the worker and the nature of the organisation raises the risk. It could give rise to a perception that the presenter has an association with an organisation that takes strong partisan positions on contentious issues.

THE SOLUTION

If real, potential or perceived editorial conflicts have been identified as a result of the process outlined above, there are several options available to deal with them:

Avoid/Reject

In the most significant cases, avoiding the editorial conflict altogether is the only solution.

These cases will be identified through upward referral to your manager.

In these situations, the external work would be declined and a record kept of the reasons for not proceeding.

Proceed but mitigate

In some cases, practical steps can be taken to reduce the level of conflict or eliminate it altogether.

For example, the nature or extent of the external work could be changed to eliminate any conflict.

Other potential mitigations, depending on the circumstances, might include declining payment for the external work, paying expenses for travel, accommodation, etc... or altering the timing of the work to avoid a conflict.

Proceed and declare

In some cases, especially those where a degree of close consideration and mitigation has been undertaken, it may be determined that a residual potential conflict continues to exist but is manageable and does not require the external work to be declined.

In such circumstances, the external work should be transparently and prominently declared in such a way that it allows relevant ABC audiences and stakeholders to be aware of it.

Proceed

There will be circumstances where a careful examination of all of the relevant issues fails to identify any real, potential or perceived risks of a conflict of interest, in which case the work can be approved and proceed without further disclosure or mitigation. A record of the approved work would still be required to be retained.

How long do conflicts last?

A very wide range of people work for the ABC on a full time, part time, contract or casual basis.

Many of them come to the ABC having worked in many different capacities for other individuals and organisations, and many go on to work for other organisations and individuals after or in between periods of employment with the ABC.

In assessing whether real, potential or perceived editorial conflicts between external and ABC work continue to exist, there are no hard and fast timelines. For example, there are ABC political reporters who have, in the past, worked as media advisors to politicians, and there are independent program makers who produce work for the ABC having, in the past, produced programs of many different kinds for many external organisations and companies.

These guidelines principally apply to active consideration of current or future external work requests by individuals currently working for the ABC. In those circumstances, the focus is on the nature and extent of any editorial conflicts, including how long those conflicts might persist.

In relation to past work conflicts, a reasonable common sense approach needs to be taken. In the most significant areas of direct and clear conflicts (for example, a former party political candidate who wants to become an ABC political journalist) an extensive period might be required to have elapsed, and in addition some temporary restrictions on the kind of ABC work done might need to be imposed as mitigating factors.

In other less direct cases, it will usually be sufficient for the ABC to satisfy itself that any past conflict has now ended and there are no remaining practical aspects of it that remain in place.

Consistency and record keeping

All requests for external work at the ABC need to be made and either approved or rejected in writing, and records should be kept of all decisions.

This is particularly important when it comes to decisions where potential editorial conflicts are involved.

While each request needs to be considered on a case by case basis as circumstances will differ, it is important that consistent principles and judgements are applied as far as possible, both within Divisions and across the ABC.

It is therefore important to retain information about not only the decisions that are made but the reasoning behind them, so that both workers and the ABC itself can ensure that guidance is followed on as consistent and predictable a basis as possible.

Whenever decisions involve declaring a possible conflict, such declarations should be transparent and effective. This means, as a general rule, that declarations in relation to on air content should be made on air in a way designed to ensure audiences are readily aware of them.

Status of Guidance Note

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

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

Related Editorial Policies

1 Independence, integrity and responsibility (<https://edpols.abc.net.au/policies/1-independence-integrity-and-responsibility/>).

[Browse Editorial Policies \(/policies/\)](/policies/)

[Editorial Guidance Documents \(/guidance/\)](/guidance/)

Visit the full Editorial Policy site (<http://about.abc.net.au/how-the-abc-is-run/what-guides-us/abc-editorial-standards/>)

[Feedback \(/feedback\)](/feedback/)

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[Accuracy \(https://edpols.abc.net.au/guidance/accuracy/\)](https://edpols.abc.net.au/guidance/accuracy/)

[Advertising and Sponsorship ABC Commercial \(https://edpols.abc.net.au/guidance/advertising-and-sponsorship-abc-commercial/\)](https://edpols.abc.net.au/guidance/advertising-and-sponsorship-abc-commercial/)

[Advertising and Sponsorship on Australia Plus \(https://edpols.abc.net.au/guidance/advertising-and-sponsorship-on-australia-plus/\)](https://edpols.abc.net.au/guidance/advertising-and-sponsorship-on-australia-plus/)

[Attribution / Anonymity of Sources \(https://edpols.abc.net.au/guidance/attribution-anonymity-of-sources/\)](https://edpols.abc.net.au/guidance/attribution-anonymity-of-sources/)

[Chequebook Journalism / Paying for Interviews \(https://edpols.abc.net.au/guidance/chequebook-journalism-paying-for-interviews/\)](https://edpols.abc.net.au/guidance/chequebook-journalism-paying-for-interviews/)

[Children and Young People: Managing their Participation in Broadcast \(https://edpols.abc.net.au/guidance/children-and-young-people-managing-their-participation-in-broadcast/\)](https://edpols.abc.net.au/guidance/children-and-young-people-managing-their-participation-in-broadcast/)

[Children and Young People: Managing their Participation Online \(https://edpols.abc.net.au/guidance/children-and-young-people-managing-their-participation-online/\)](https://edpols.abc.net.au/guidance/children-and-young-people-managing-their-participation-online/)

[Competitions and Prizes \(https://edpols.abc.net.au/guidance/competitions-and-prizes/\)](https://edpols.abc.net.au/guidance/competitions-and-prizes/)

[Complaints Handling \(https://edpols.abc.net.au/guidance/complaints-handling/\)](https://edpols.abc.net.au/guidance/complaints-handling/)

[Consulting ABC Legal and Handling External Requests for Access to Contentious Program Material \(https://edpols.abc.net.au/guidance/consulting-abc-legal-and-handling-external-requests-for-access-to-contentious-program-material/\)](https://edpols.abc.net.au/guidance/consulting-abc-legal-and-handling-external-requests-for-access-to-contentious-program-material/)

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[Managing External Funding in Broadcast Television \(https://edpols.abc.net.au/guidance/managing-external-funding-in-broadcast-television/\)](https://edpols.abc.net.au/guidance/managing-external-funding-in-broadcast-television/)

[Moderating User Generated Content \(https://edpols.abc.net.au/guidance/moderating-user-generated-content/\)](https://edpols.abc.net.au/guidance/moderating-user-generated-content/)

[Operating Official ABC Social Media Accounts \(https://edpols.abc.net.au/guidance/operating-official-abc-social-media-accounts/\)](https://edpols.abc.net.au/guidance/operating-official-abc-social-media-accounts/)

[Removing Online Content \(https://edpols.abc.net.au/guidance/removing-online-content/\)](https://edpols.abc.net.au/guidance/removing-online-content/)


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 [Domestic Violence \(https://edpols.abc.net.au/guidance/domestic-violence/\)](https://edpols.abc.net.au/guidance/domestic-violence/)



From: [Joanne Puccini](#)
To: [Bruce Belsham](#)
Subject: FW: Book
Date: Wednesday, 10 August 2016 1:33:01 PM

From: Louise Milligan
Sent: Wednesday, 10 August 2016 1:28 PM
To: Joanne Puccini
Subject: Re: Book

Ok thanks for getting on to it so quickly Jo. I will have a chat to Bruce about it.

Sent from my iPhone

On 10 Aug 2016, at 10:39 AM, Joanne Puccini <Puccini.Joanne@abc.net.au> wrote:

See below. I've told Bruce he should discuss this with you directly as it's above my pay grade

[REDACTED]

7(2)
program
material

Cheers

Jo

Sent from my iPhone

Begin forwarded message:

From: Michele Fonseca <Fonseca.Michele@abc.net.au>
Date: 10 August 2016 at 8:01:52 AM AEST
To: Bruce Belsham <Belsham.Bruce@abc.net.au>, Joanne Puccini <Puccini.Joanne@abc.net.au>
Subject: RE: Book

Hi Jo,

[REDACTED]

47(1)(b)
commercially
valuable
information

47C
deliberative
material

Michele

[<image002.gif>](#)

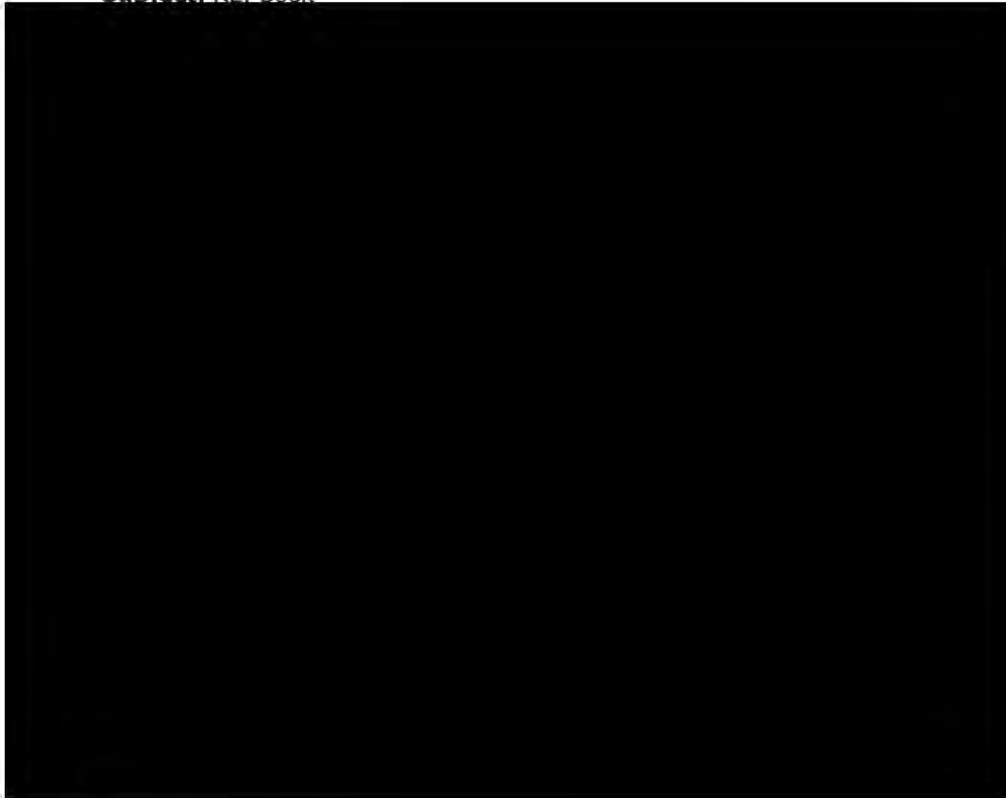
Michele Fonseca
Head Strategy & Staff Development

P +61 2 8333 4730 E fonseca.michele@abc.net.au
F +61 2 8333 2505

[<image003.jpg>](#)

47F personal
privacy

From: Bruce Belsham
Sent: Monday, 8 August 2016 5:04 PM
To: Joanne Puccini
Cc: Michele Fonseca
Subject: RE: Book



47(1)(b)
commercially
valuable
information

47C
deliberative
material

47F personal
privacy

Bruce

From: Joanne Puccini
Sent: Monday, 8 August 2016 2:24 PM
To: Bruce Belsham
Subject: FW: Book

Hi there,

I know Louise needs to fill a request for outside work form and a leave form for leave without pay which she will do but here is an initial request.



47C
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material

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material

[REDACTED]
Jo

From: Louise Milligan
Sent: Monday, 8 August 2016 1:40 PM
To: Joanne Puccini
Subject: Book

Hi Jo,

As discussed, I would like to apply to do some work outside of the ABC – namely, on a book about Cardinal George Pell to be published by Melbourne University Press.

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[REDACTED]
[REDACTED] I would hope to take a month off, leave without pay, some time in the near future while the whole thing is still fresh in my mind.

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material

[REDACTED]
[REDACTED] MUP are pretty keen to put a timetable in motion, so if you could pass this on to management, that would be really great.

Thanks again Jo,

Louise.

[<image004.jpg>](#)

**Louise Milligan
Reporter**

P + 61 3 9626
1453

E milligan.louise@abc.net.au

T twitter.com/milliganreports

F facebook.com/ABC730

W abc.net.au/7.30

47F personal
privacy

From: [Gaven Morris](#)
To: [Michele Fonseca](#)
Cc: [Bruce Belsham](#); [Jodi Fleming](#)
Subject: Re: Book
Date: Wednesday, 17 August 2016 6:15:09 AM
Attachments: [Image001.gif](#)
[Image002.jpg](#)
[Image003.jpg](#)

Yes .. The email chain here is the first I've been aware so am catching up a bit.

Gaven

On 16 Aug 2016, at 5:41 PM, Michele Fonseca <Fonseca.Michele@abc.net.au> wrote:

Can we discuss this at some stage this week?

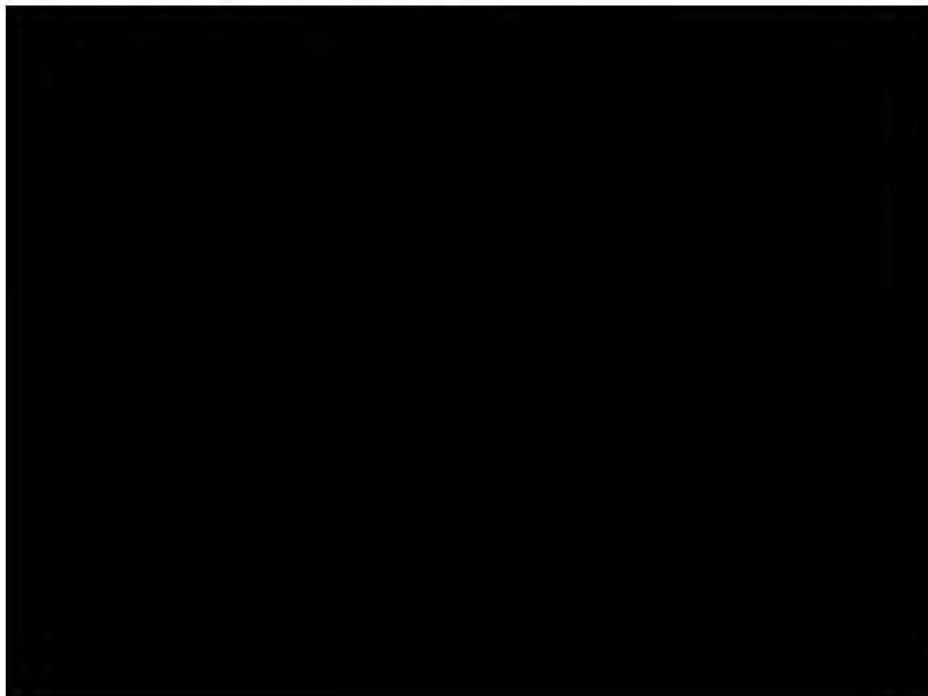
Michele

Begin forwarded message:

From: Louise Milligan <Milligan.Louise@abc.net.au>
Date: 16 August 2016 at 5:03:56 PM AEST
To: Bruce Belsham <Belsham.Bruce@abc.net.au>, Michele Fonseca <Fonseca.Michele@abc.net.au>
Subject: Book

Hi Bruce and Michele,

Thanks for your input on the book idea and to Bruce for your continued strong support on this story. I am glad you think it's a good idea and I looking forward to writing it.



47(1)(b)
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information

47C
deliberative
material

[REDACTED]

47C
deliberative
material

[REDACTED]

7(2) program
material

47C deliberative
material

[REDACTED]

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deliberative
material

47(1)(b)
commercially
valuable
information

47(1)(b)
commercially
valuable
information

Anyway, those are my thoughts on this. I'd like to get started on it while it is fresh – as I mentioned to Jo, to take a month off leave without pay to start writing. MUP are also keen to get moving with it.

I know you're under the pump today Bruce, but if you get a chance... Otherwise we can speak in the morning.

Thank you both again,

Louise.

Begin forwarded message:

From: Michele Fonseca <Fonseca.Michele@abc.net.au>

Date: 10 August 2016 at 8:01:52 AM AEST

To: Bruce Belsham <Belsham.Bruce@abc.net.au>, Joanne Puccini <Puccini.Joanne@abc.net.au>

Subject: RE: Book

Hi Jo,

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valuable
information



47C
deliberative
material

47(1)(b)
commercially
valuable
information

Michele

[<image001.gif>](#)

Michele Fonseca
Head Strategy & Staff Development

P	+61 2 8333 4730	E	fonseca.michele@abc.net.au
		F	+61 2 8333 2505

[<image002.jpg>](#)

47F personal
privacy

From: Bruce Belsham
Sent: Monday, 8 August 2016 5:04 PM
To: Joanne Puccini
Cc: Michele Fonseca
Subject: RE: Book



47C
deliberative
material

47(1)(b)
commercially
valuable
information

47F personal
privacy

Bruce

[<image003.jpg>](#)

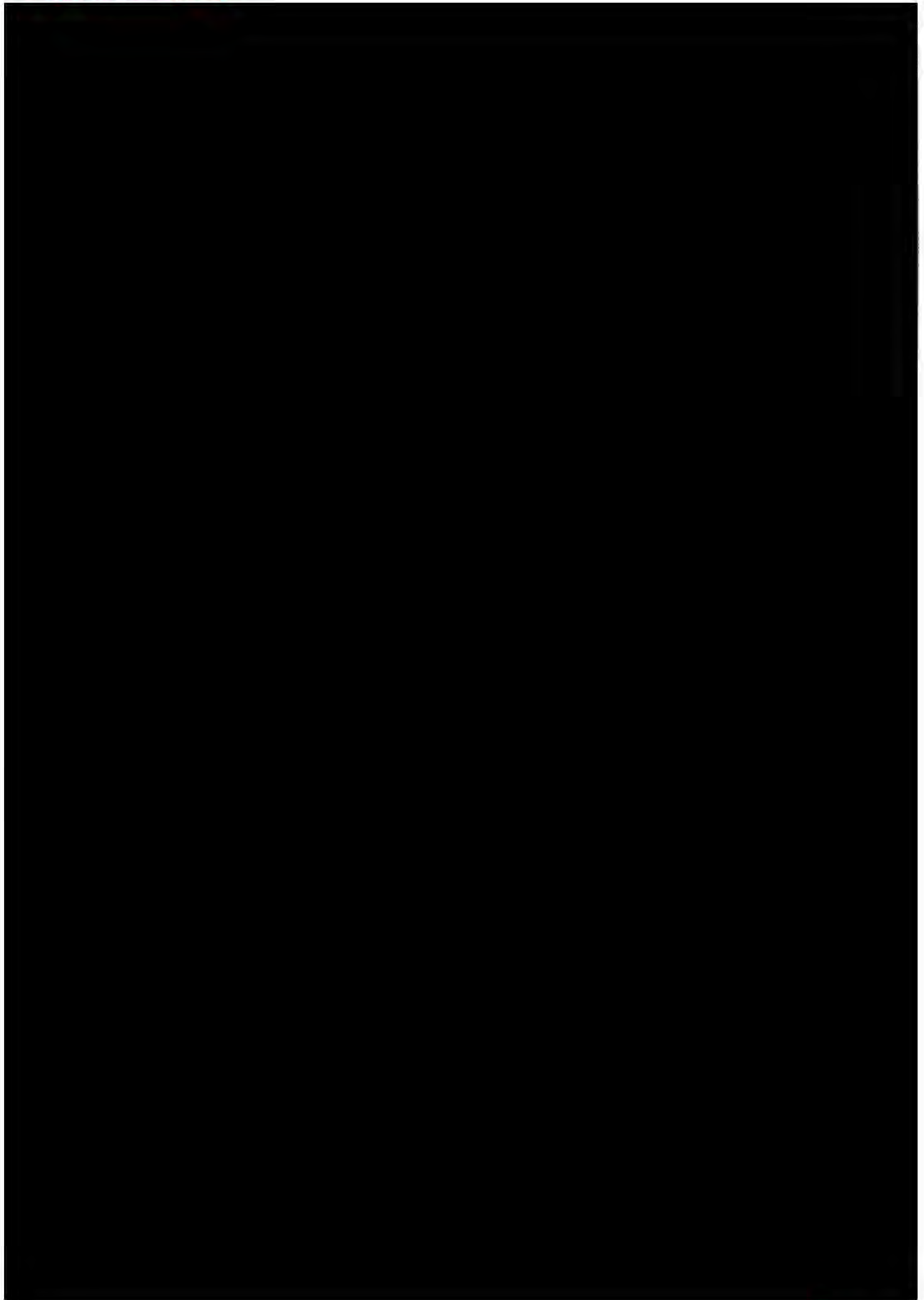
Louise Milligan
Reporter

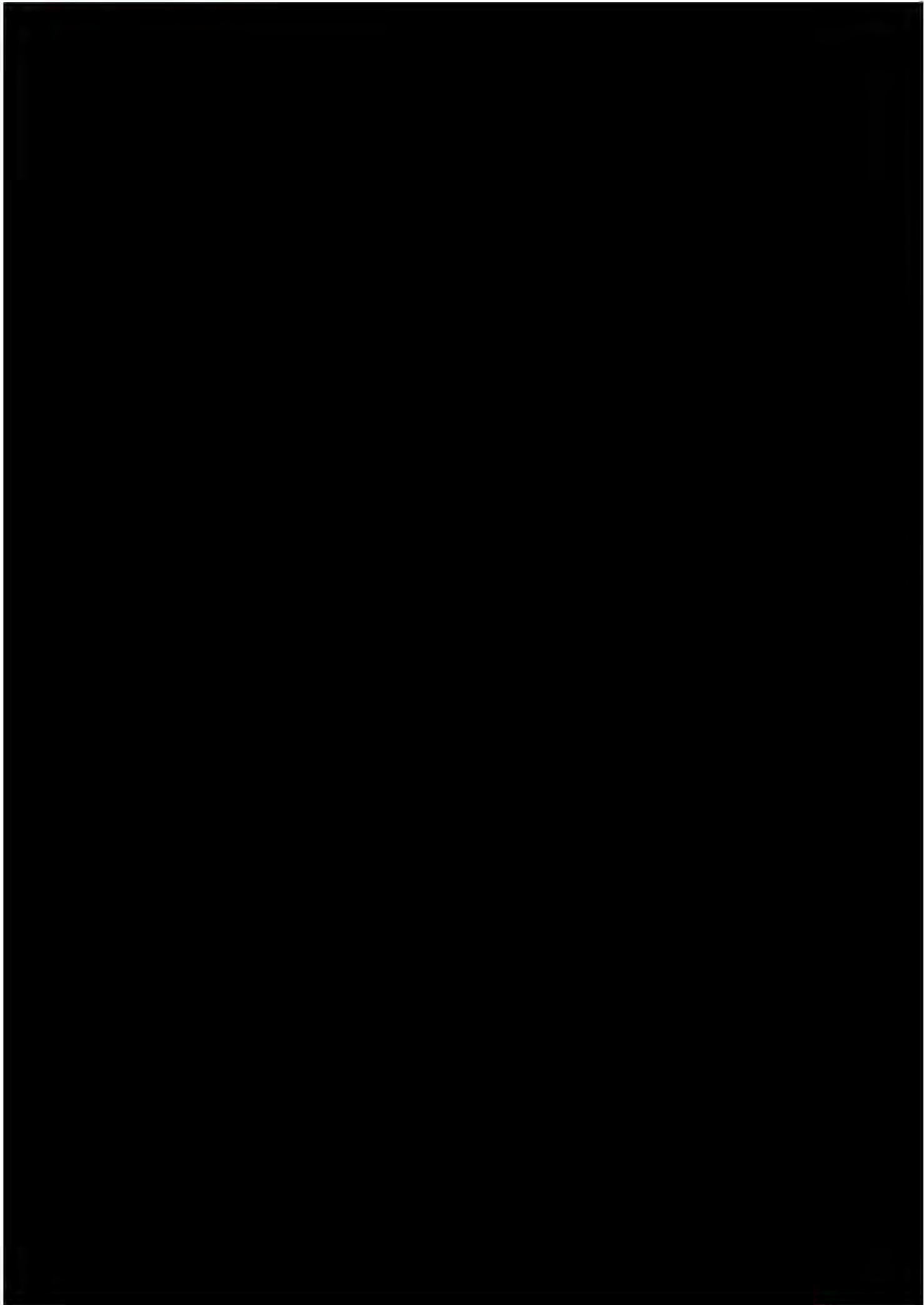
P	+ 61 3 9626 1453	E	milligan.louise@abc.net.au
		T	twitter.com/milliganreports
		F	facebook.com/ABC730
W	abc.net.au/7.30		

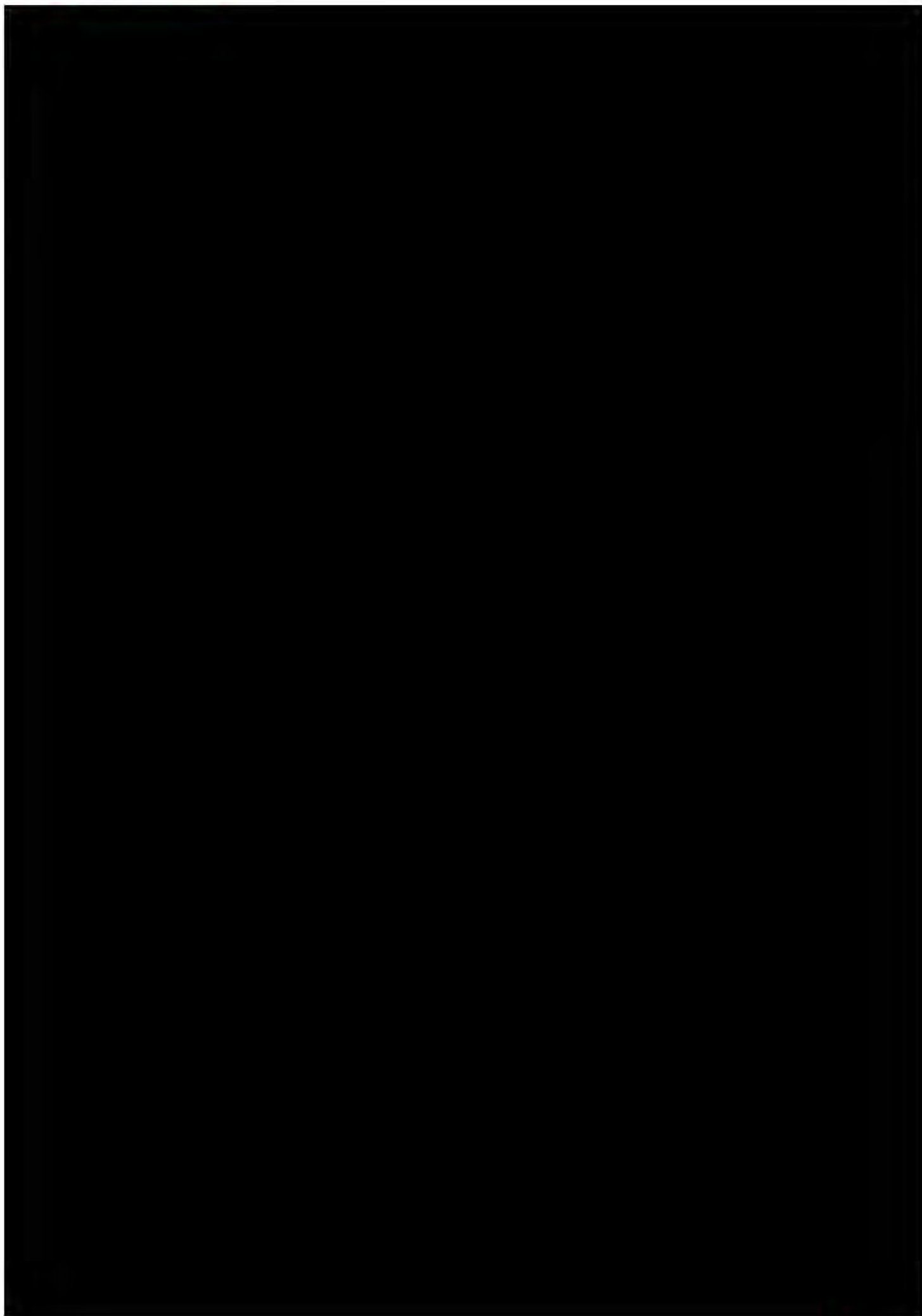
47F personal
privacy

42 legal professional privilege









From: [Louise Milligan](#)
To: [Bruce Belsham](#)
Subject: RE:
Date: Tuesday, 16 August 2016 2:17:37 PM
Attachments: [Image001.jpg](#)

No worries and thanks.

From: Bruce Belsham
Sent: Tuesday, 16 August 2016 2:17 PM
To: Louise Milligan
Subject: RE:

Yep. Slammed today but i will try to give you a call

From: Louise Milligan
Sent: Tuesday, 16 August 2016 1:55 PM
To: Bruce Belsham
Subject:

Hi Bruce,

Do you have time for a quick chat today re the book? I've just left a message on your phone. I was hoping to have time to come and see you when I was in Sydney yesterday but it was a crazy day.

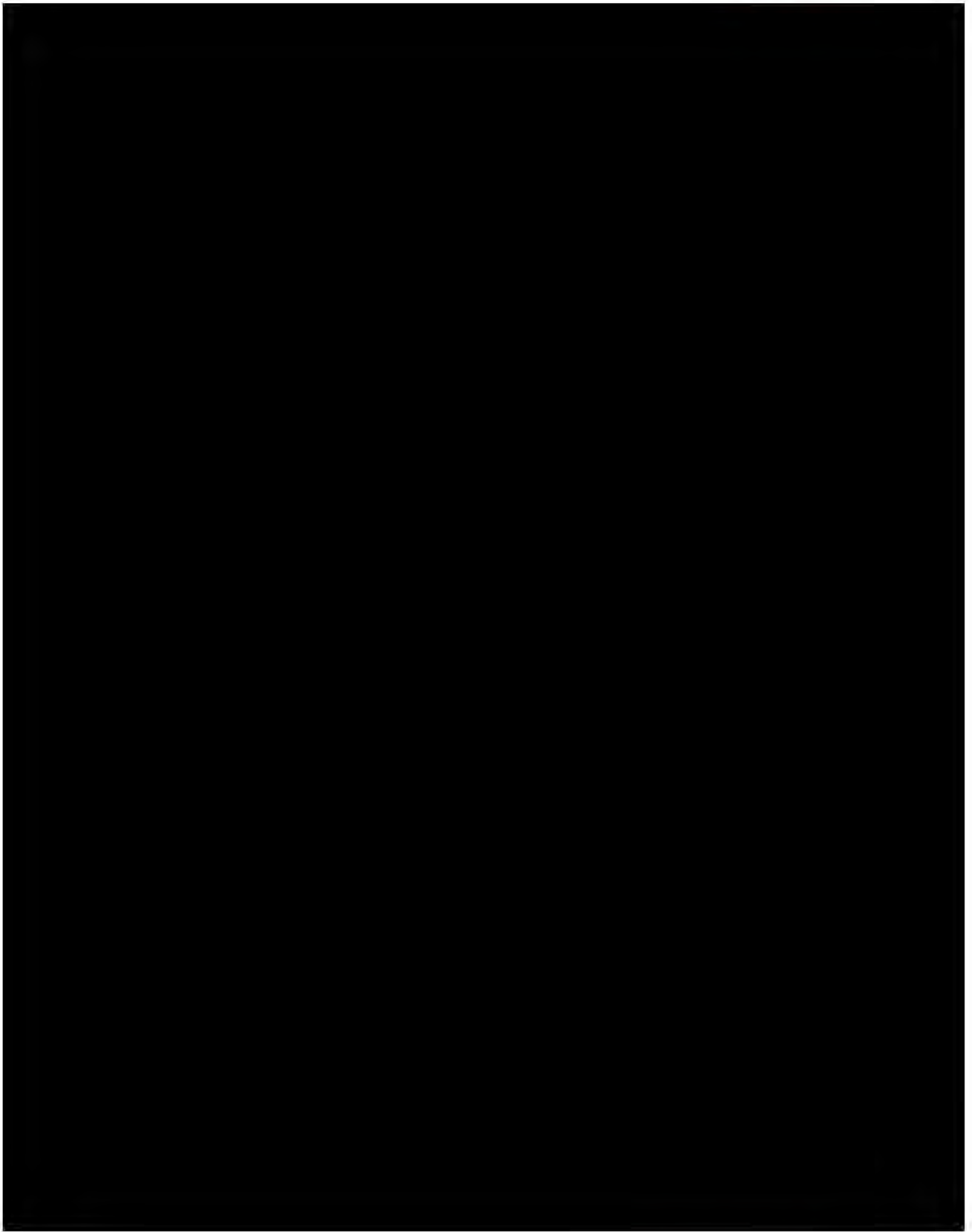
Many thanks,
Louise.



Louise Milligan
Reporter

P	+ 61 3 9626 1453	E	milligan.louise@abc.net.au
T		T	twitter.com/milliganreports
W	abc.net.au/7.30	F	facebook.com/ABC730

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privacy



47C deliberative material

From: [Bruce Belsham](#)
To: [Michele Fonseca](#); [Gaven Morris](#)
Cc: [Jodi Fleming](#)
Subject: RE: Briefing notes regarding Milligan/MUP proposal
Date: Thursday, 18 August 2016 12:55:37 PM
Attachments: [Image001.gif](#)
[Image002.jpg](#)



47C
deliberative
material

7(2)
program
material

Bruce

From: Michele Fonseca
Sent: Thursday, 18 August 2016 12:43 PM
To: Gaven Morris; Bruce Belsham
Cc: Jodi Fleming
Subject: Briefing notes regarding Milligan/MUP proposal

Gav,

Bruce has written to Louise to let her know the three of us approve in principle the MUP book deal, [REDACTED]

47(1)(b)
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information

Here are some dot points which summarise the situation:

- [REDACTED]
- [REDACTED]
- Louise's book would not be about the 7.30 story per se, or the making of the 7.30 story. Rather, it would draw on Louise's long-standing expertise on Pell and her long-running coverage of Pell's career and the Royal Commission
- [REDACTED]
- Louise M has not yet formally committed to MUP, but she would like to start writing the book asap

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information

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information

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deliberative
material

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personal
privacy

ABC



Michele Fonseca
Head Strategy & Staff Development

P +61 2 8333 4730 E fonseca.michele@abc.net.au
[REDACTED] F +61 2 8333 2505



From: Michele Fonseca
Sent: Thursday, 18 August 2016 8:28 PM
To: Gaven Morris <Morris.Gaven@abc.net.au>
Cc: Bruce Belsham <Belsham.Bruce@abc.net.au>; Jodi Fleming <Fleming.Jodi@abc.net.au>
Subject: Re: Briefing notes regarding Milligan/MUP proposal

Ok, thanks.

On 18 Aug 2016, at 8:15 PM, Gaven Morris <Morris.Gaven@abc.net.au> wrote:

I've written to [REDACTED] now .. See where we get.

G

47(1)(b)
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information

<9921182A-5176-4EFD-
A616-
D5F57AF944AA[7].png>
Gaven Morris
Director News
P +61 2 8333 3095 Email morris.gaven@abc.net.au
[REDACTED] Twitter @gavmorris
<0CD3B9D6-7C41-42DF-AC68-92FED32D2A1F[7].png>

47F personal
privacy

From: Michele Fonseca <Fonseca.Michele@abc.net.au>
Date: Thursday, 18 August 2016 12:43 pm
To: Gaven Morris <Morris.Gaven@abc.net.au>, Bruce Belsham
<Belsham.Bruce@abc.net.au>
Cc: Jodi Fleming <Fleming.Jodi@abc.net.au>
Subject: Briefing notes regarding Milligan/MUP proposal

Gav,

Bruce has written to Louise to let her know the three of us approve in principle the MUP book deal [REDACTED]

47(1)(b)
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valuable
information

Here are some dot points which summarise the situation:

- [REDACTED]
- [REDACTED]
- Louise's book would not be about the 7.30 story per se, or the making of the 7.30 story. Rather, it would draw on Louise's long-standing expertise on Pell and her long-running coverage of Pell's career and the Royal Commission

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information

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privacy

47(1)(b)
commercially
valuable
information

- Louise M has not yet formally committed to MUP, but she would like to start writing the book asap



47C
deliberative
material

[<image001.gif>](#)

Michele Fonseca
Head Strategy & Staff Development

P +61 2 8333 4730 E fonseca.michele@abc.net.au
F +61 2 8333 2505

47F personal
privacy

[<image002.jpg>](#)

From: [Louise Milligan](#)
To: [Bruce Belsham](#)
Subject: RE: RE:
Date: Tuesday, 23 August 2016 1:38:30 PM

That's great. Thank you Bruce - appreciate it.

-----Original Message-----

From: Bruce Belsham
Sent: Tuesday, 23 August 2016 1:13 PM
To: Louise Milligan
Subject: RE: RE:

Gaven's come back to me. [REDACTED] So you can proceed with MUP. I will need to get a written undertaking from you on a couple of issues around ABC reputation etc.- stuff we've discussed already. I'll send a formal memo that you can agree to by return email.

47(1)(b)
commercially
valuable
information

cheers

Bruce

-----Original Message-----

From: Louise Milligan
Sent: Monday, 22 August 2016 4:19 PM
To: Bruce Belsham
Subject: Re: RE:

Thanks Bruce. I might email Gaven.

Cheers.

Sent from my iPhone

> On 22 Aug 2016, at 3:10 PM, Bruce Belsham <Belsham.Bruce@abc.net.au> wrote:
>

[REDACTED]

47(1)(b)
commercially
valuable
information

>

> B

>

> -----Original Message-----

> From: Louise Milligan
> Sent: Monday, 22 August 2016 2:49 PM
> To: Bruce Belsham
> Subject:

>

> Hi Bruce,

>

> Just wondered if you have heard back from Gaven [REDACTED] re my project with MUP? Keen to get it organised.

47(1)(b) commercially
valuable information

>

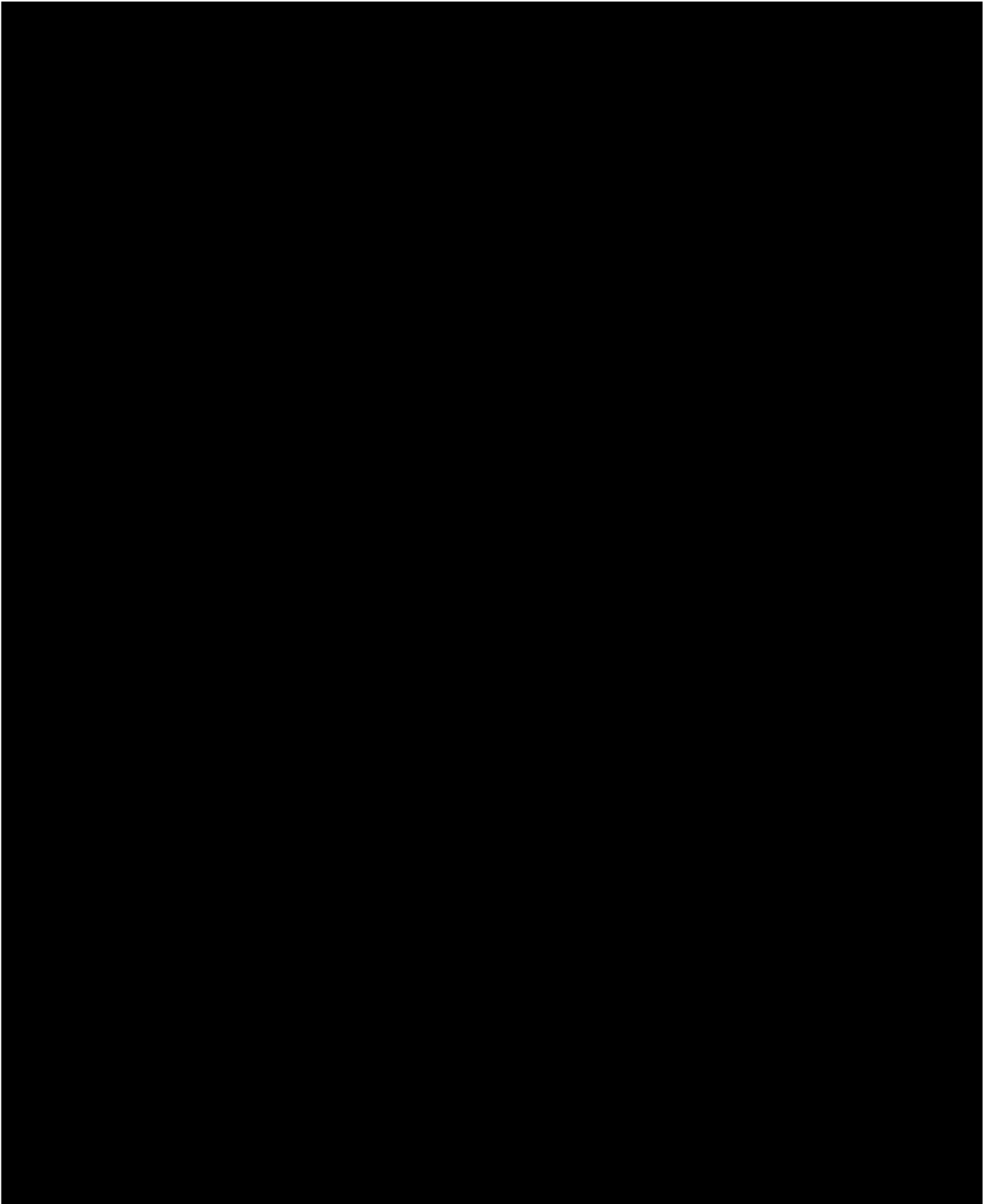
> Thanks so much,

> Louise.

>

> Sent from my iPhone

ACCESS REFUSED



47(1)(b) commercially valuable information

Antoinette Smith

From: Juliette Van Heyst
Sent: Wednesday, 12 October 2016 8:41 AM
To: Antoinette Smith
Cc: Norma Nankervis
Subject: Re: Louise Milligan [REDACTED] - LWOP - roster

irrelevant to request

Hi Toni,

You mustn't have seen this email. Yes Louise has delegate approved external work for October.

[REDACTED]
so NPEC can add in the LWOP.

47F personal privacy

Thanks,
Juliette

PROCESSED IN SAP - PP 12.10.16
27.10.16

irrelevant to request

Sent from my iPhone

On 11 Oct. 2016, at 10:17 pm, Juliette Van Heyst <VanHeyst.Juliette@abc.net.au> wrote:

Hi Toni,

[REDACTED]
Yes, Louis is doing external work over this period.

Thanks,
Juliette

47F personal privacy

From: Antoinette Smith
Sent: Tuesday, 11 October 2016 4:53 PM
To: Juliette Van Heyst
Subject: FW: Louise Milligan [REDACTED] - LWOP

irrelevant to request

Hello Juliette,

Also, I just need to double check why is she having LWOP [REDACTED]
[REDACTED] Is it External work (which has been approved)?

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Thanks

Toni Smith
NPEC
X85-4984

From: Juliette Van Heyst
Sent: Friday, 7 October 2016 11:16 AM
To: National Pay <National.Pay@abc.net.au>
Subject: Louise Milligan [REDACTED] - LWOP

irrelevant to request

Hi National Pay, irrelevant to request
Confirming that 7.30 Melbourne Reporter Louise Milligan [REDACTED]
is on LWOP for period 31 Sep – 30 Oct 2016 inclusive. Emails below specify details.
[REDACTED]

Thank you,
Juliette

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privacy

<image001.jpg> Juliette van Heyst
Snr Production Manager, 7.30 ABC News

P +61 83334840 E vanheyst.juliette@abc.net.au
M [REDACTED] F +61 8333 4788

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privacy



From: Sarah Curnow
Sent: Tuesday, 23 August 2016 8:34 PM
To: Louise Milligan; Joanne Puccini
Cc: Juliette Van Heyst
Subject: RE: Book

Confirming dates change.
[REDACTED]

Book leave without pay Oct 2 – 28 inclusive. 4 weeks.

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privacy

From: Louise Milligan
Sent: Tuesday, 23 August 2016 2:03 PM
To: Joanne Puccini; Sarah Curnow
Subject: Book

Hi Jo,

Bruce has got back to me with the good news - saying Gaven has the green light for me to do the book, pending some undertakings by me re ABC reputation etc.

So I have had a chat to Sarah about taking a month leave without pay. [REDACTED]
[REDACTED]

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privacy

7(2) program
material
47F personal
privacy

So that would mean that I [REDACTED]
[REDACTED] start the month of leave without pay on Monday September 26. That would bring me
back to work October 24.

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privacy

Cheers,

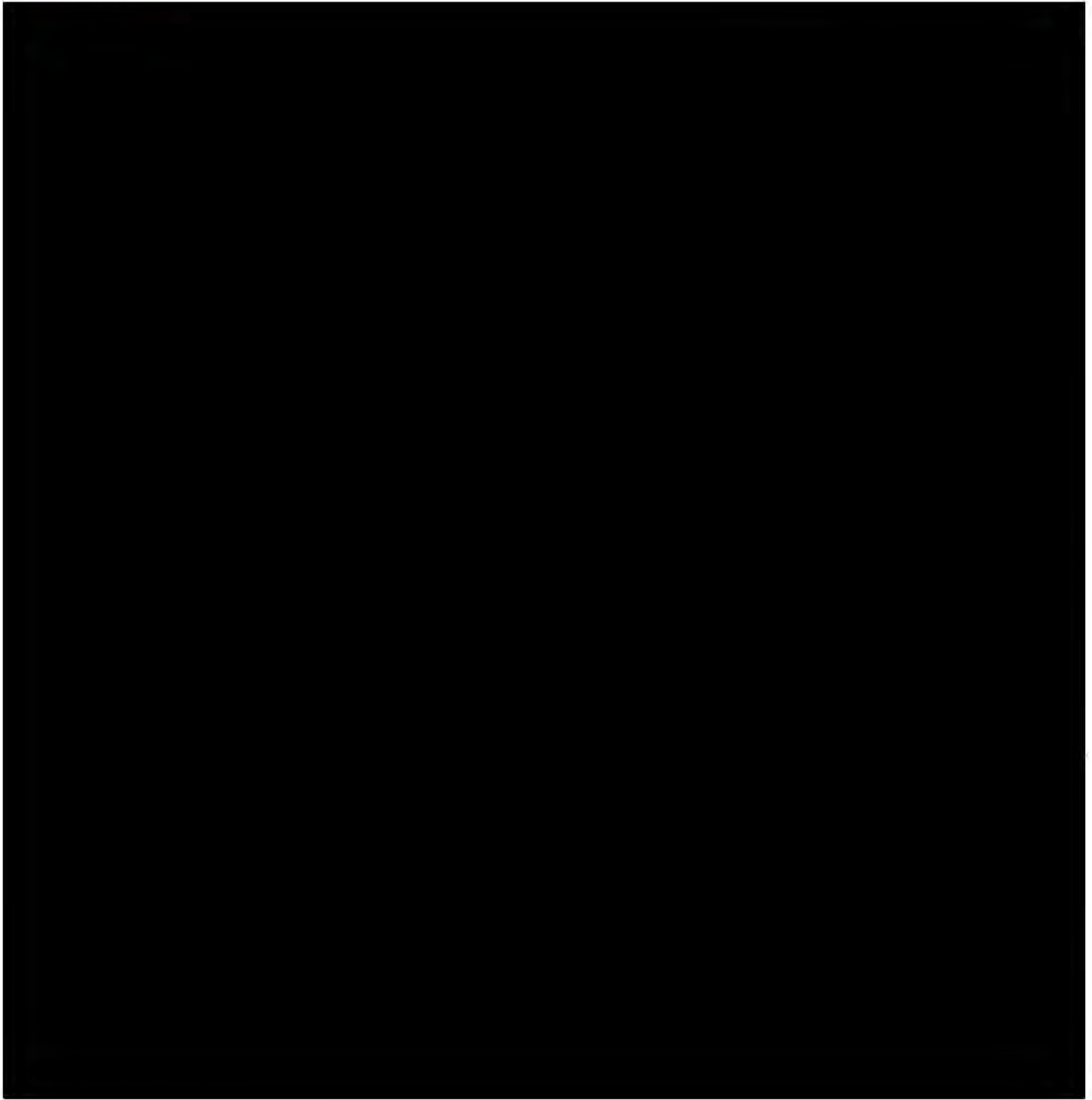
Lou.

<image001.jpg> **Louise Milligan
Reporter**

P	+ 61 3 9626 1453	E	milligan.louise@abc.net.au
M	[REDACTED]	T	twitter.com/milliganreports
W	abc.net.au/7.30	F	facebook.com/ABC730

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privacy

irrelevant to request



From: Tricia Hojski
Sent: Thursday, 3 November 2016 2:56 PM
To: Danielle Bonica <Bonica.Danielle@abc.net.au>
Subject: RE: Louise Milligan [REDACTED]

Hi Danielle,

Yes, will do.

Can you please arrange delegate approval [REDACTED]

Email approval will be fine – can

you please arrange.

Thanks
Trish Hojski
ABC Pay & Entitlements Centre
85.4982

From: National Pay
Sent: Thursday, 3 November 2016 12:38 PM
To: Antoinette Smith <Smith.Antoinette@abc.net.au>; Brenda Jefferys <Jefferys.Brenda@abc.net.au>; Gavin Powney <Powney.Gavin@abc.net.au>; Graham Mesecke <Mesecke.Graham@abc.net.au>; Liliانا Sanchez <Sanchez.Liliana@abc.net.au>; Stamatia Makridis <Makridis.Stamatia@abc.net.au>; Tricia Hojski <Hojski.Tricia@abc.net.au>
Subject: FW: Louise Milligan [REDACTED] irrelevant to request

From: Danielle Bonica
Sent: Thursday, 3 November 2016 12:38 PM
To: National Pay <National.Pay@abc.net.au>
Subject: Louise Milligan [REDACTED] irrelevant to request

Hi NP

Could you please release Louise from LWOP from [REDACTED] irrelevant to request

On the

[REDACTED] 10

[REDACTED] 10

[REDACTED] 10

47F personal privacy

As per her delegate's request below.

Kind regards

Danielle

From: Sarah Curnow
Sent: Monday, 31 October 2016 7:36 PM
To: Danielle Bonica <Bonica.Danielle@abc.net.au>; Juliette Van Heyst <VanHeyst.Juliette@abc.net.au>; Louise Milligan <Milligan.Louise@abc.net.au>
Subject: Louise [REDACTED] 47F personal privacy

Hi D

Louise Milligan was supposed to be on leave without pay until today. But she worked a full day [REDACTED] and 47F personal privacy
she worked a full day spread over [REDACTED] and [REDACTED]
[REDACTED]

Regards
Sarah,



Sarah Curnow
Melbourne Bureau Chief

P + 61 (0)3 9626 1420 E curnow.sarah@abc.net.au
[REDACTED] @SCurnow1
W abc.net.au/7.30 F facebook.com/ABC730

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Sarah Curnow

From: Joanne Puccini
Sent: Thursday, 3 November 2016 4:19 PM
To: Danielle Bonica
Cc: Sarah Curnow
Subject: RE: Louise Milligan [REDACTED] irrelevant to request

approved

From: Danielle Bonica
Sent: Thursday, 3 November 2016 3:02 PM
To: Joanne Puccini
Cc: Sarah Curnow
Subject: FW: Louise Milligan [REDACTED] irrelevant to request

Hi Jo,

Could you please approve removal of LWOP for the shifts below?

Thanks

Danielle

From: Danielle Bonica
Sent: Thursday, 3 November 2016 12:38 PM
To: National Pay <National.Pay@abc.net.au>
Subject: Louise Milligan [REDACTED] irrelevant to request

Hi NP

Could you please release Louise Milligan from LWOP from [REDACTED] irrelevant to request

On the

[REDACTED] 10
[REDACTED] 10
[REDACTED] 10

47F personal
privacy

As per Sarah Curnow's request.

Kind regards

Danielle

From: Sarah Curnow
Sent: Monday, 31 October 2016 7:36 PM
To: Danielle Bonica <Bonica.Danielle@abc.net.au>; Juliette Van Heyst <VanHeyst.Juliette@abc.net.au>; Louise Milligan <Milligan.Louise@abc.net.au>
Subject: Louise [REDACTED]

47F personal
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Hi D

Louise Milligan was supposed to be on leave without pay until today. But she worked a full day [REDACTED] and [REDACTED] she worked a full day spread over [REDACTED] and [REDACTED]

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Regards
Sarah.



Sarah Curnow
Melbourne Bureau Chief

P + 61 (0)3 9626 1420 E curnow.sarah@abc.net.au

W [REDACTED] @SCurnow1

W abc.net.au/7.30

F facebook.com/ABC730

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From: [Louise Milligan](#)
To: [Michele Fonseca](#)
Cc: [Bruce Belsham](#); [Gaven Morris](#)
Subject: Re: BOOK ON PELL
Date: Monday, 20 March 2017 9:41:10 AM

Hi Michele,

Yes as discussed the book was approved. The book has not yet been released

[REDACTED]

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It is an examination of George Pell and the wider Catholic Church in Australia in light of the Royal Commission and the allegations against the Cardinal. It does not pretend to be a biography. There is a vast amount of historical material going right back to his time in the seminary - I interviewed many priests and other members of the Catholic Church - and it goes into forensic analysis of his Royal Commission evidence. The allegations which we pursued at 7.30 form just one part of it. When telling the stories of complainants, I use their police statements as a primary guide

[REDACTED]

7(2) program
material

[REDACTED]

[REDACTED] there is scant discussion about anything to do with the ABC beyond the fact that the story was first broadcast on 7.30, that when we first heard of the allegations we thought they could not be true and that it was only through months of work that it became apparent there was a story there. There is a tiny mention here or there to say that my producer was Andy Burns (who worked on the story throughout) and my bureau chief and EP were Sarah Curnow and Jo Puccini. There is no discussion about them though. They are the only ABC staff mentioned in the narrative and it is fleeting.

[REDACTED]

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7(2) program
material

[REDACTED]

[REDACTED] The book contains some new allegations [REDACTED] but they are not related to the ABC. They are sourced with Royal Commission statements and police statements.

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material

[REDACTED]

Thanks and feel free to give me a call on the mobile any time. I am shooting for Four Cs this week so will be travelling but just leave a message and I will get back to anyone who has queries.

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privacy

Cheers,

Louise.

Sent from my iPhone

On 20 Mar 2017, at 8:59 am, Michele Fonseca <Fonseca.Michele@abc.net.au> wrote:

Hi Louise and Bruce,

irrelevant to request

[REDACTED]

Please see below – before I respond to Alan to let him know we were aware of the book proposal and approved it, can you both let me know what steps you have taken in the process on the book being written, to ensure the ABC is satisfied the actual content will not compromise the ABC's reputation? I know in earlier correspondence Louise, you said you would talk further to Bruce about the process, [REDACTED] Let me know, and I'll include that in my response to Alan.

47F personal
privacy

Michele

From: Alan Sunderland [<mailto:alansunderland@gmail.com>]
Sent: Saturday, 18 March 2017 4:25 PM
To: Gaven Morris <Morris.Gaven@abc.net.au>
Cc: Michele Fonseca <Fonseca.Michele@abc.net.au>; Jodi Fleming <Fleming.Jodi@abc.net.au>; Mark Maley <Maley.Mark@abc.net.au>
Subject: BOOK ON PELL

Gav

I'm not across this at all but I assume others are.

[REDACTED]

47C
deliberative
material

A

From: [Louise Milligan](#)
To: [Michele Fonseca](#)
Cc: [Bruce Belsham](#); [Gaven Morris](#)
Subject: Re: BOOK ON PELL
Date: Monday, 20 March 2017 10:06:14 AM

One more thing I forgot to add: this book was written while on leave without pay, annual leave and outside of work hours. [REDACTED]

47C
deliberative
material

Sent from my iPhone

On 20 Mar 2017, at 8:59 am, Michele Fonseca <Fonseca.Michele@abc.net.au> wrote:

Hi Louise and Bruce,

irrelevant to request

[REDACTED]

Please see below – before I respond to Alan to let him know we were aware of the book proposal and approved it, can you both let me know what steps you have taken in the process on the book being written, to ensure the ABC is satisfied the actual content will not compromise the ABC's reputation? I know in earlier correspondence Louise, you said you would talk further to Bruce about the process, [REDACTED] Let me know, and I'll include that in my response to Alan.

47F personal
privacy

Michele

From: Alan Sunderland [<mailto:alansunderland@gmail.com>]
Sent: Saturday, 18 March 2017 4:25 PM
To: Gaven Morris <Morris.Gaven@abc.net.au>
Cc: Michele Fonseca <Fonseca.Michele@abc.net.au>; Jodi Fleming <Fleming.Jodi@abc.net.au>; Mark Maley <Maley.Mark@abc.net.au>
Subject: BOOK ON PELL

Gav

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material

A

From: [Michele Fonseca](#)
To: [Gaven Morris](#)
Cc: [Jodi Fleming](#)
Subject: FW: BOOK ON PELL
Date: Monday, 20 March 2017 4:14:37 PM
Importance: High

[REDACTED]

47C
deliberative
material

Michele

From: Michele Fonseca
Sent: Monday, 20 March 2017 4:13 PM
To: Louise Milligan <Milligan.Louise@abc.net.au>; Gaven Morris <Morris.Gaven@abc.net.au>;
Bruce Belsham <Belsham.Bruce@abc.net.au>
Cc: Jodi Fleming <Fleming.Jodi@abc.net.au>
Subject: RE: BOOK ON PELL
Importance: High

Thanks Louise. I have spoken to Alan and given him the context in which your proposal was approved and explained your commitment that the book will be thoroughly legalised; will not in any way pose risks to the ABC's reputation; and will not compromise our editorial independence and integrity.

[REDACTED]

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material

Michele

From: Louise Milligan
Sent: Monday, 20 March 2017 10:06 AM
To: Michele Fonseca <Fonseca.Michele@abc.net.au>
Cc: Bruce Belsham <Belsham.Bruce@abc.net.au>; Gaven Morris <Morris.Gaven@abc.net.au>
Subject: Re: BOOK ON PELL

One more thing I forgot to add: this book was written while on leave without pay, annual leave and outside of work hours.

[REDACTED]

47C
deliberative
material

Sent from my iPhone

From: [Bruce Belsham](#)
To: [Mark Maley](#); [Sally Jackson](#)
Cc: [Carmel Keohan](#)
Subject: RE: Estimates briefs
Date: Tuesday, 16 May 2017 5:57:54 PM

Mark

I've just double checked the leave details. One change to previous advice. Louise Milligan did do the book in her own time including over summer when she took annual leave.

She did however apply for and was granted 4 weeks leave without pay. During that leave she also worked on the project.

So the advice on the ABC not contributing any resource to the book is accurate, but it is the case she was granted leave – even though that leave was unpaid.

[REDACTED]

47F
personal
privacy

Bruce

From: Mark Maley
Sent: Tuesday, 16 May 2017 4:22 PM
To: Bruce Belsham <Belsham.Bruce@abc.net.au>; Sally Jackson <Jackson.Sally@abc.net.au>
Cc: Carmel Keohan <Keohan.Carmel@abc.net.au>
Subject: RE: Estimates briefs

Thanks Bruce

From: Bruce Belsham
Sent: Tuesday, 16 May 2017 1:16 PM
To: Sally Jackson <Jackson.Sally@abc.net.au>; Mark Maley <Maley.Mark@abc.net.au>
Cc: Carmel Keohan <Keohan.Carmel@abc.net.au>
Subject: RE: Estimates briefs

irrelevant
to request

[REDACTED]

On The Book

- o Was Ms Milligan working for the ABC when she wrote the book? The book was not an ABC book but a Melbourne University Press book. ABC News management was aware of the project and stipulated that it be clear it was not an ABC product and that it not use ABC resources.

- o Was leave approved and was it paid leave?

[REDACTED]

47C
deliberative
material

- o Did the ABC know what the leave was for/aware of the book/approve of the book? (see above)

- o Did Ms Milligan use any of the work she has done for the ABC in producing the book?

[REDACTED]

47C
deliberative
material

From: Sally Jackson

Sent: Tuesday, 16 May 2017 12:16 PM

To: Mark Maley <Maley.Mark@abc.net.au>; Bruce Belsham <Belsham.Bruce@abc.net.au>

Subject: RE: Estimates briefs

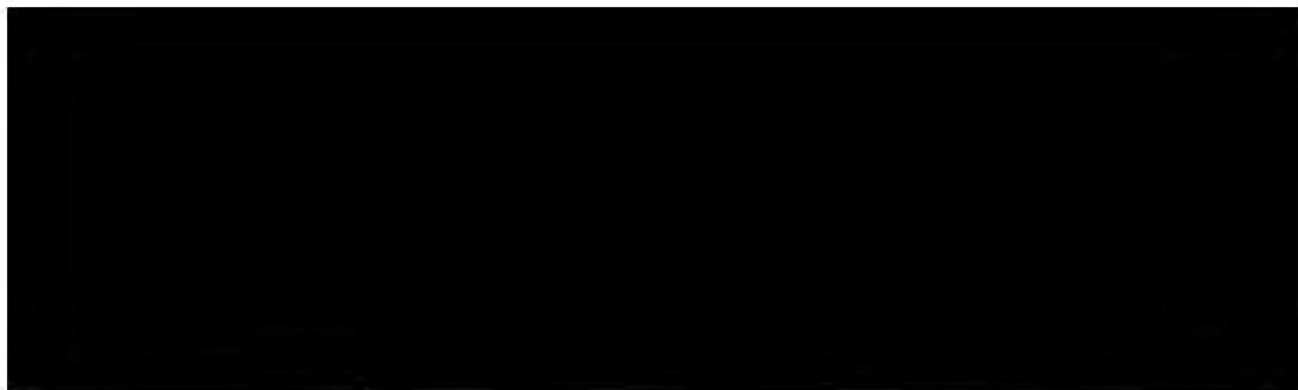
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[REDACTED]

[REDACTED]

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material

irrelevant
to request



From: Mark Maley
Sent: Tuesday, 16 May 2017 12:11 PM
To: Bruce Belsham <Belsham.Bruce@abc.net.au>
Cc: Sally Jackson <Jackson.Sally@abc.net.au>
Subject: FW: Estimates briefs

Hi Bruce

Can you give me responses to the questions on Q&A and Louise's book and I'll pass them on to Kevin?

Thanks

Mark

From: Kevin McAlinden
Sent: Tuesday, 16 May 2017 10:57 AM
To: Mark Maley <Maley.Mark@abc.net.au>; Sally Jackson <Jackson.Sally@abc.net.au>
Subject: Estimates briefs

Hi both,

Just drafting a couple of additional News briefs after our prep session with the MD yesterday. Will put the briefs together but will need some words from News on each issue:

irrelevant
to request



Louise Milligan book

- o Was Ms Milligan working for the ABC when she wrote the book?
- o Was leave approved and was it paid leave?
- o Did the ABC know what the leave was for/aware of the book/approve of the book?
- o Did Ms Milligan use any of the work she has done for the ABC in producing the book?

irrelevant
to request



Would be great to have the info by tomorrow morning.

Thanks,

Kevin

7.30 LEAVE/BACKFILL		@ Fri 30 Sep
GUESTS/ TRANSFERS		
STAFF	DATE	DETAILS

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7.30 STAFF	

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Louise Milligan	Oct (1 month)	LWOP
- backfilling Louise Melb		

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Louise Milligan	(1 month)	LWOP
- backfilling Louise Melb		

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Louise Milligan	(1 month)	LWOP
backfilling Louise Melb		

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STAFF	FUTURE LEAVE	DETAILS
Louise Milligan	(1 month)	LWOP

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TOIL		
STAFF	DAYS	DETAILS

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ABC FOI
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Document 18
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Conflict of Interest & Outside Work

Introduction

Conflict of interest is an Editorial Policy issue and also a corporate policy issue. We must manage conflicts of interest so our decisions and content adhere to standards 1.3 and 1.4 of the [Editorial Policies](#) (<https://intranet.abc.net.au/assets/documents/editorialpoliciesandguidance/editorialpolicies/EditorialPOLWhiteAlbum.pdf>):

- **1.3** Ensure that editorial decisions are not improperly influenced by political, sectional, commercial or personal interests.
- **1.4** External activities of individuals undertaking work for the ABC must not undermine the independence and integrity of the ABC's editorial content.

We must also manage them in accordance with the corporate [Conflict of Interest Policy](#) (<https://intranet.abc.net.au/know-the-abc/all-policies/conflict-of-interest-policy>), and [Disclosure Procedures](#) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestPDC.pdf>), and the associated guidelines on [Confidentiality](#) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestConfidentialityINS.pdf>), [External Work](#) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestExternalWorkINS.pdf>), [Standing for or Holding Political or Public Office](#) (<https://intranet.abc.net.au/assets/documents/howto/peopleandlearning/palguidelines/ConflictOfInterestStandingHoldingPoliticalPublicOfficeINS.pdf>). The conflict of interest provisions in the [Code of Conduct](#) (<https://intranet.abc.net.au/know-the-abc/all-policies/hr-policies-and-guidelines/abc-values-and-standards-of-workplace-behaviour>) are relevant as well. The advice below is intended to explain some of the key concepts as they apply within ABC Television. It supports but does not supersede the policies cited above.

Staff should also familiarise themselves with the guidance note on [External Work and Editorial Conflicts](#) (<https://intranet.abc.net.au/assets/documents/editorialpoliciesandguidance/guidancenotes/ExternalWorkGuidanceNote.pdf>).

What is a conflict of interest?

A conflict of interest is a situation where an individual has competing personal, political, sectional or commercial interests that make it difficult for them to fulfil their duties appropriately. In terms of the ABC a conflict of interest is where your non ABC interest, such as a commercial, personal or political activity, competes with your ABC interest, i.e. your ABC work. Managing conflicts of interest is critical to your reputation and the reputation of the ABC. If these interests are not well managed they can damage your editorial integrity and the independence and integrity of the ABC.

Who do the conflict of interest policies apply to?

All those working on ABC content, including presenters, have responsibilities in relation to conflict of interest, although they apply in different ways.

1. ABC employees full time, part time or fixed term are bound by the Code of Conduct, Editorial Policies and employment agreement provisions.
2. Contractors on consultancy agreements are bound by the Editorial Policies and provisions of consultancy agreements.
3. Co producer's employees and contractors are bound by Editorial Policies and the provisions of the relevant co production agreement. This agreement will require the production to be delivered in accordance with Editorial Policies, including the conflict of interest provisions.

What types of conflict of interest exist?

Real conflict of interest

This is where your ABC interest, i.e. the performance of your ABC work, and an interest, activity or work outside the ABC come into conflict.

Example: as well as working at the ABC as a producer, you are the secretary of the RSPCA. Your executive producer asks you to develop a story about animal welfare which will include negotiating access with the RSPCA to one of their animal shelters. These two interests: one ABC, one non ABC are now in conflict.

Potential conflict of interest

This is where your ABC interest and your non ABC interest could come into conflict in the future or through a likely change of circumstances.

Example: as well as working at the ABC as a producer, you are the secretary of the RSPCA. Another producer in your department is developing a story about animal welfare that will include negotiating with the RSPCA about access. Although you are not currently working on the story, it is possible that you may have some role on the story. You do not have a real conflict, you have a potential conflict which may become a real conflict in the future.

Perceived conflict of interest

This is where there is a perception by others that there is, or could be, a conflict of interest between your ABC interest and your non ABC interest.

Example: as well as working at the ABC as a producer, you are the secretary of the RSPCA. Your department has, prior to you working for them, produced a number of stories about animal welfare which include material about the RSPCA. These stories have received substantial publicity. The department has no plans to do any further stories. There is no conflict of interest, however others may perceive there is a conflict.

What do I need to do as an individual?

The ABC expects you to manage your non ABC interests, activities and/or work in order to prevent a conflict with your ABC interests.

Managing your interests requires you to regularly review your ABC interests work duties, areas of responsibility, activities, content, story and program areas and your outside interests work, activities, and relationships including financial, personal and/ or political. Ask yourself is there any conflict between these interests now, in the future, or could a conflict be perceived by others?

If you are unclear about how these interests may or may not conflict, or the perception of others, seek advice from your supervisor or Editorial Policy Advisor. If, after reviewing your interests, you decide that you have a real or potential conflict of interest you are required to declare that conflict at the earliest opportunity. In Television, these declarations can be made verbally or in writing to your supervisor. Your supervisor may also discuss the matter with an Editorial Policy Advisor.

If you are aware that there is a perception by others that you have a conflict of interest, it is important to review your interests and upwardly refer your findings to your supervisor. It may be important to keep file notes of any investigation into a perceived conflict of interest in order to protect your reputation and that of the ABC if there is further investigative action.

How do I manage outside or non-ABC work?

Many ABC employees undertake non ABC work. Employees, whether full time, part time or contractors, can work outside of the ABC with prior written approval from your supervisor, Head of Department or Controller, Editorial Policy Advisor, and the Director of Television. Outside work can include:

- Paid or unpaid work
- Long term or short term work such as a speaking engagement
- The conduct of a business, trade or profession
- Voluntary or charity work

Outside work is approved through the Outside Work Approval Form, available as a [PDF](https://intranet.abc.net.au/assets/documents/information/peopleandlearning/careerdevelopmenttraininglearninganddevelopment/earningservices/OutsideWorkApprovalFRM.pdf) (<https://intranet.abc.net.au/assets/documents/information/peopleandlearning/careerdevelopmenttraininglearninganddevelopment/earningservices/OutsideWorkApprovalFRM.pdf>), or [Word document](https://intranet.abc.net.au/assets/documents/information/peopleandlearning/careerdevelopmenttraininglearninganddevelopment/earningservices/OutsideWorkApprovalFRMWorddocx.docx) (<https://intranet.abc.net.au/assets/documents/information/peopleandlearning/careerdevelopmenttraininglearninganddevelopment/earningservices/OutsideWorkApprovalFRMWorddocx.docx>).

What do I need to do as a supervisor or Editorial Manager?

Every supervisor or manager is responsible for bringing to the attention of their staff the need to declare any conflict of interest and to seek approval for outside or non ABC work. Every Editorial Manager is responsible for undertaking this process for each of their productions.

In relation to co productions or pre purchases, the Editorial Manager is responsible for bringing to the attention of the co producer or independent producer their need to discuss conflict of interest issues with their employees and contractors.

As part of the Commissioning process, any conflict of interest must be declared via the Editorial Policy section of the Content Executive Decision Paper and details submitted to Editorial Policy for review.

What will the response to a declaration of a conflict of interest be?

Your supervisor will advise you of an appropriate course of action. This action may include:

- To approve or reject a proposed activity, for example, outside work (see above).
- That you should not work on particular stories or programs related to the outside activity, association or interest.
- That a public disclosure of the outside activity, association or 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 you have a declared an association or interest.
- That no further action is required.

In determining responses to declarations, supervisors will consider the following:

- Whether the activity, association or interest would damage the editorial integrity of the program and the ABC.
- Whether the activity, association or interest would damage your ability to do your job.
- The editorial nature of the program.
- The nature of the outside activity, association or interest.
- Any damage that could be done to the audience's perception of the editorial integrity of the program if the outside activity, association or interest were discovered.

If the activity is approved, it may be on the basis that it is undertaken without any reference to your role or work at the ABC. The Code of Conduct provision on Public Comment makes it clear that you must not make public comment on behalf of the ABC unless you are specifically approved to do so.

Gifts and Cash Prizes

Please refer to the [Gifts and Cash Prizes Advice Note \(https://intranet.abc.net.au/content-making/other-editorial-advice/tv-editorial-policy-advice/gifts-and-cash-prizes\)](https://intranet.abc.net.au/content-making/other-editorial-advice/tv-editorial-policy-advice/gifts-and-cash-prizes) for conflict of interest in relation to gifts and other benefits.

Conflict of Interest Policy

Status: Approved

Document number (TRIM): D11/10596

Policy issued: 23 July 2014

Policy Owner:

Head Employee Relations

ABC People

82 5160

Policy Statement

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

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

All workers.

Consequences of breach

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

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

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>), [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>), [PDF 140 Kb]

b) Standing for or Holding Political or Public Office

(<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>), [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

Procedures and Guidelines

- Conflict of Interest Disclosure Procedures (<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>). [PDF 140 Kb], Standing for or Holding Political or Public Office (<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%7b5FB68CF9A78C4FCA85DEAC47EA416A7A%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%20the%20abc/all%20policies/discrimination%20bullying%20and%20other%20workplace%20behaviour%20policy)).
- Fraud Policy ([https://intranet.abc.net.au/know the abc/all policies/fraud policy](https://intranet.abc.net.au/know%20the%20abc/all%20policies/fraud%20policy)).
- Procurement policy ([https://intranet.abc.net.au/know the abc/all policies/procurement policy](https://intranet.abc.net.au/know%20the%20abc/all%20policies/procurement%20policy)).
- Delegations policy ([https://intranet.abc.net.au/know the abc/all policies/delegations policy](https://intranet.abc.net.au/know%20the%20abc/all%20policies/delegations%20policy)).
- 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%20the%20abc/all%20policies/hr%20policies%20and%20guidelines/abc%20values%20and%20standards%20of%20workplace%20behaviour)). [PDF 76 Kb]
- Public Interest Statement Form (<https://intranet.abc.net.au/assets/documents/forms/peopleandlearning/policy/PublicInterestStatementFRM.pdf>). [PDF 133 Kb]

Document History

- 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 DISCLOSURE PROCEDURES

WHICH POLICY ARE THESE PROCEDURES RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx

5

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,

10

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.

20

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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Title	Conflict of Interest Disclosure Procedures
Document Number	D11/10597
Status	APPROVED BY OSG
Current as at	24 March 2011
Next review date	January 2013

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*.



Title	Conflict of Interest Disclosure Procedures
Document Number	D11/10597
Status	APPROVED BY OSG
Current as at	24 March 2011
Next review date	January 2013

CONFLICT OF INTEREST GUIDELINES: EXTERNAL WORK

WHICH POLICY IS THE GUIDELINE RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx

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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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Document Number
Status
Current as at
Next review date

Conflict of Interest Guidelines: External Work
D11/10599
APPROVED
9 June 2015
April 2016

30 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.

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

40 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.

45 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.

55 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

60 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

65 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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9 June 2015
April 2016

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.



Title
Document Number
Status
Current as at
Next review date

Conflict of Interest Guidelines: External Work
D11/10599
APPROVED
9 June 2015
April 2016

CONFLICT OF INTEREST GUIDELINES: CONFIDENTIALITY

WHICH POLICY IS THE GUIDELINE RELATED TO?

Policy title	Conflict of Interest Policy
Document Number	D11/10596
URL	http://myabc/~media/Documents/Policies/PeopleAndLearning/PALPolicies/ConflictofInterestPOLpdf.ashx

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PURPOSE OF GUIDELINE

This is a guide on how employees can satisfy their obligations to uphold their duty of confidentiality and manage any actual, potential or perceived conflict of interest.

- 10 Employees must ensure that they are fully aware of and understand their obligations as outlined in this Guideline.

CONFIDENTIALITY

- 15 All employees are bound by a duty of confidentiality, which requires employees to refrain from disclosing Confidential Information either internally or externally, other than for the purpose of performing their duties for the ABC, where required by law or with the authority of the Divisional Director.

- 20 *Confidential Information* means all trade and business secrets, other Confidential Information and documents (in whatever form, however stored and including copies and extracts) relating to the affairs and business of the ABC which is not publicly available, whether or not any of this was originally supplied by the ABC and includes but is not limited to client and supplier details, lists and contacts, ABC reports and plans, personal information of ABC employees and contractors, ABC's commercial and broadcasting activities and information received by the ABC which is confidential to others.

- 25 Information published by the ABC or which is otherwise in the public domain is not considered to be Confidential Information.

- 30 The requirement to refrain from disclosing Confidential Information extends indefinitely beyond the period of an employee's employment. Employees and former employees have an obligation to preserve the confidentiality of Confidential Information for as long as it remains confidential.



Title
Document Number
Status
Current as at
Next review date

Conflict of Interest Guidelines: Confidentiality
D11/10598
APPROVED BY OSG
24 March 2011
January 2013

CONFIDENTIALITY, CONFLICT OF INTEREST AND DISCLOSURE

The release of Confidential Information in breach of this Guideline constitutes a conflict of interest with an employee's duty to preserve the confidential nature of the ABC's Confidential Information.

- Employees who are not sure as to whether or not information is confidential must seek further advice and permission from their Manager or Divisional Director *before* releasing the information.
- Employees should immediately notify their Manager or Divisional Director of any actual, potential or perceived unauthorised use, copying or disclosure of Confidential Information of which they are aware.
- Managers and/or Divisional Directors should then follow the disclosure procedures detailed in the Conflict of Interest Policy in assessing the conflict and determining what, if any, action should be taken.

BREACH OF POLICY & 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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