

WORONI

Australian National University Student Media
CONFLICT OF INTEREST POLICY

1. This policy has been formulated in light of the *Corporations Act 2001* (Cth).

2. Purpose

As Board members of a media organisation, ANU Student Media editors should exercise extreme caution when identifying and acting on conflicts of interest. A conflict of interest has the potential to cause extensive and irreparable damage to the reputation of ANU Student Media and the editors themselves, and could also jeopardise the relationship of service and trust between ANU Student Media and the ANU community. The purpose of this policy is to protect the integrity of the decision-making process, to enable stakeholders to have confidence in the integrity of ANU Student Media, and to protect the integrity and reputation of all Board members, sub-editors, volunteers and employees.

3. General Obligations

All Board members, sub-editors, volunteers and employees of ANUSM will strive to avoid any conflict between the interests of ANUSM on the one hand, and personal, professional and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest. Examples of conflicts of interests include:

- a. an Editor who is a family relative to an employee, in law or otherwise, and there is a decision to be made on employee pay;
- b. an Editor who is also on the committee of another organisation that is competing with ANU Student Media for funding; and
- c. an Editor who has shares in a business that may be awarded a contract to do work or provide services for ANU Student Media.

4. Disclosure Obligations for Editors

- a. An Editor who has a material personal interest in a matter that relates to the affairs of the organisation must give the other Editors notice of the interest.
- b. A Editor who has an interest in a matter must give the other Editors standing notice of the nature and extent of the interest in the matter in accordance with section V. The notice may be given at any time, whether or not the matter relates to the affairs of the organisation at the time the notice is given.

5. Disclosure Procedure for Editors

- a. Upon appointment each Editor will make a full disclosure of interests, such as relationships and posts held that could potentially result in a conflict of interest.

This will be formally noted in the minutes of the first Board meeting of the Editor's term.

- i. The Deputy Editor-in-Chief is responsible for uploading a copy of these minutes to the ANUSM website within 48 hours of the meeting. These minutes must be signed by the Editor-in-Chief.
- b. When entering into a new interest, Editors must, at their earliest convenience, notify the Editor-in-Chief and Deputy Editor-in-Chief in writing, as well as formally declaring to the rest of the Board at the next Board meeting that they have entered into a new interest that could lead to a potential conflict, giving an outline of said conflict.
 - i. The Deputy Editor-in-Chief is responsible for uploading a copy of these minutes to the ANUSM website within 48 hours of the meeting. These minutes must be signed by the Editor-in-Chief.
 - ii. The same process must be followed if an Editor is terminating a conflict of interest. The Deputy Editor-in-Chief is again responsible for uploading a copy of these minutes to the ANUSM website within 48 hours of the meeting. These minutes do not have to be signed.
- c. During Board meetings, communication or activities, Editors must disclose any interests in a transaction or decision where there may be a conflict between the best interests of ANUSM and the Editor themselves, or a conflict between the best interests ANUSM and another organisation in which the Editor is involved. If in doubt, the potential conflict must be declared and clarification sought.
 - i. If clarification is sought, the Editor declaring the conflict of interest may choose to obtain clarification from the Editor-in-Chief, or in the form of a Board majority decision.
 - ii. It is recommended that in such a case the Editor should have their conflict noted in the minutes of the meeting.
- d. Upon declaring a conflict of interest, the relevant Editor should abstain from voting on any motions relating to that interest. It is acknowledged that no member of the Board, nor the Board as a whole, can force an Editor to abstain from voting. Editors have absolute and unconditional discretion to decide whether or not to abstain from voting on motions.

6. Disclosure Requirements for Volunteers

- a. It is the responsibility of the Editors to inquire about the relevant potential conflicts of interest of the volunteers and staff under their supervision and to keep the Board, and the Deputy Editor-in-Chief informed of any conflicts.

7. Obligations of the Deputy Editor-in-Chief

- a. As the record keeper and secretary of the Association, as per section 12.2 of the ANUSM Constitution, it is the responsibility of the Deputy Editor-in-Chief to retain records of all Editors' and Sub-Editors' conflicts of interest as they are disclosed.

- i. These records are to be kept confidential and are for internal use only to mitigate and manage risk of the Association.
 - ii. Should these records be requested they may be provided by and at the discretion of the Deputy Editor-in-Chief in accordance with section 19.2 of the ANUSM Constitution. If provided, efforts must be made to protect the privacy of persons listed in the records.
- b. The Deputy Editor-in-Chief retains discretion as to whether it is in the best interest of the Association for Editors' conflicts of interest to be public knowledge.
 - i. Conflicts of interest to be made public will be done so via the Woroni website.
 - ii. If there is doubt as to whether a conflict should be public knowledge, clarification may be sought from the Editor-in-Chief, or in the form of a Board majority decision.

8. Risk Management Procedure

- a. In the event that an Editor's conflict of interest, or potential conflict of interest, may influence their judgement, or otherwise cause risk of reputational damage to the Association:

- i. The Editor must immediately notify the Editor-in-Chief and Deputy Editor-in-Chief, if they are aware of the risk, and then should excuse themselves from any related discussions and decisions; or
 - ii. The Editor-in-Chief or Deputy Editor-in-Chief will notify the Board that a conflict of interest exists and may ask the Editor to recuse themselves from related discussions, decisions and projects.

- b. In the event that a Sub-Editor's conflict of interest, or potential conflict of interest, may influence their judgement, or otherwise cause risk of reputational damage to the Association:

- i. The Sub-Editor must immediately notify the Editor(s) they report to, if they are aware of the risk;
 - ii. The Editor responsible must immediately alert the Editor-in-Chief and Deputy Editor-in-Chief of any and all risks posed; and
 - iii. The Editor responsible, Editor-in-Chief or Deputy Editor-in-Chief may ask the sub-editor to recuse themselves from related discussions, decisions and projects.

9. Policy Details

This policy was adopted by ANU Student Media on 23/01/2017

The policy was last updated on 19/07/2018