

**Question on notice no. 363**

**Portfolio question number: 101**

**Additional estimates**

**Foreign Affairs, Defence and Trade Committee, Defence Portfolio**

**Senator Jordon Steele-John:** asked the Australian War Memorial on 4 March 2020

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(8. Does the Memorial have any policies in place in relation to perceived conflicts of interest when current or recent past employees of the Memorial receive remuneration from a company with whom the Memorial has had a financial relationship?

**Answer —**

Answer attached

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**Senate Standing Committee on Foreign Affairs, Defence and Trade  
Additional Estimates 2019 - 2020 – 4 March 2020  
Answers to questions on notice from the Veterans' Affairs portfolio**

**Question 101**

**Outcome: All Program: All**

**Topic: Conflict of Interest Policies**

(Written Question on Notice)

**Senator Jordon Steele-John asked:**

Does the Memorial have any policies in place in relation to perceived conflicts of interest when current or recent past employees of the Memorial receive remuneration from a company with whom the Memorial has had a financial relationship?

**Answer**

The Memorial has in place a Director's Instruction (DI - No.7.8) relating to Outside Employment. This DI requires employees to obtain permission if they wish to engage in employment outside their official duties. The purpose of the DI is to ensure employees act with care and diligence in the course of APS employment, and to ensure employees disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with APS employment.

In approving outside employment the following criteria are considered:

- i. Employees should not engage in any employment outside the Memorial which might be detrimental to the performance of their official duties or which might lead to a clash of loyalties.
- ii. Outside employment must be conducted wholly within the employee's private time.
- iii. Employees, who may in the course of their official duties, have access to confidential or particular information not available to the public, should not engage in any outside employment to which this information might be relevant.
- iv. Employees should not accept payment for any outside engagement that directly relates to their duties and responsibilities at the Memorial. Fees for such services may be paid to the Memorial directly. In such cases the Director, or an Assistant Director will give notice in writing to the employee in relation to the whole or a specified part of the fee to be paid to the Memorial.

The application of the DI does not extend to recent past employees.

In addition to the above Memorial employees must comply with key obligations under Sections 70 and 79 of the Crimes Act 1914, section 91.1 of the Criminal Code 1995, the Freedom of Information Act 1982 and the Information Privacy Principles contained in the Privacy Act 1988 which governs employees obligations in respect to information and privacy.

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