



Policy on Public Comment 2004/06

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## Purpose

To provide policy and guidelines to assist CSIRO staff in their external communication activities and to ensure that all such activities serve to enhance the Organisation's overall standing and reputation.

## Background

CSIRO and its staff enjoy a strong and longstanding reputation in the wider community. The views of staff can therefore be very influential in informing governments, the bureaucracy, industry and the community. CSIRO staff are encouraged to communicate and this policy is designed to facilitate open communication and informed public debate, while recognising CSIRO's responsibilities as a primarily Commonwealth-funded statutory body.

There are many mechanisms through which CSIRO staff express views and provide information and advice. This policy on public comment is designed to cover public speaking engagements, submissions to public inquiries, comments to the media (radio, television and newspapers), and views expressed in books, journals, brochures and on the Internet – in other words wherever it is likely that the publication of comment will flow to the community at large.

### Introduction

It is important to consider the following Policy on Public Comment by CSIRO staff against the broader background of a number of interrelated issues:

The responsibilities and obligations upon CSIRO, as a primarily Commonwealth-funded statutory body, to encourage its staff to relate their research to the broader needs and aspirations of the community.

Scientific views and inputs must be constructively integrated with social, economic and political considerations to increase the likelihood of CSIRO's scientific contributions being understood, accepted and appropriately incorporated into public policy formulation, commercial products and services.

On occasions, this will require CSIRO staff to go beyond commenting on purely scientific issues.

• The privileges and responsibilities of staff of CSIRO as a primarily Commonwealth-funded statutory body. CSIRO staff have access to certain information that is not generally available and there is a level of authority that flows from being a staff member of CSIRO. Staff must therefore exercise care in the use of this position. This includes the need to exercise care in entering into associations with organisations or groups whose main purpose is (or is seen to be) to lobby government and/or to criticise perceived shortfalls in government policy.

- Increasing expectations and demands from the community and particular groups (such as farmers) for technical information to assist them in making important decisions affecting the future of both individuals and the country as a whole. A current example is the range of issues (scientific, safety, economic and social) around whether farmers should be planting GM crops. On some issues, there will be differing scientific views and CSIRO's comments must be balanced and draw on the totality of the relevant expertise within the Organisation. CSIRO cannot be silent on these issues and must recognise that it will on occasion be difficult to develop a one-CSIRO position (in which case, a clear statement to this effect is not inappropriate).
- Ethical considerations different individuals and groups (including different scientists) have different values and ethics (individual ethics and also the ethics of the organisation to which they belong). A policy on public comment by CSIRO staff cannot readily accommodate these differences, nor can it instruct staff beyond requiring a minimum level of integrity in all communication activities.

These considerations introduce a range of complexities so there will be many occasions that require careful judgement, and hence, the following policy and procedures often require reference to a senior officer before proceeding.

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This policy applies to all CSIRO staff engaged in all public communication activities (except for the publication of scientific and technical papers in the scientific literature).

# Policy Statement and Principals

#### It is CSIRO policy that:

- 1 No staff, other than those listed (see procedure 1, page 7), should comment to the media unless they have been granted permission to do so.
- 2 CSIRO staff should not comment publicly on adopted, or proposed, government or opposition policy.
- 3 CSIRO staff should limit communication about the scientific aspects of their work to their specific area of expertise.
- A Staff should be alert when commenting on non-scientific issues relating to their scientific area of research. Non-scientific staff should limit their comment to their area of work. Comment by all staff on matters outside their area of expertise should be made only following permission, or made in a private capacity (where it must be clearly stated that it is a personal view). In these areas in particular, staff must be aware at all times of the need to distinguish between providing comment and lobbying.

- Official CSIRO submissions to public inquiries should be forwarded to the relevant authorised officer (see procedure 5, page 10) prior to submission. Personal submissions must not disclose official information without relevant authorisation and staff must make it clear that such submissions are being made in a private capacity.
- Where CSIRO staff are asked to serve on external bodies, committees of inquiry, etc staff must first establish whether they are being invited as a representative of CSIRO or as an expert private individual. Similar procedures to those applying to submissions then apply (see procedure 6, page 11).
- **7** CSIRO stationery, e-mail systems, etc. should not be used for any external correspondence in which a private opinion is expressed, and which may give an impression that the comments are authorised by CSIRO.

Similarly, any use of the CSIRO name or logo by an individual staff member or third party (other than as part of official CSIRO business) must have the prior approval of CSIRO Corporate Communications.

Compliance by all staff with this policy and the following procedures is essential to safeguard CSIRO's reputation.

## Procedures and Responsibilities

#### Comments to the Media and Media Releases

Before a CSIRO staff member provides any comment to the media, they should seek permission from the Divisional Chief or Deputy Chief in which the staff member works, the Divisional Communication Manager, or the Manager of Corporate Communications.

The following Executives are authorised to speak to the media, but before doing so, they should inform the Executive Director of Communications:

- The Chief Executive
- The Deputy Chief Executive and other members of the Executive Team
- Chiefs of Divisions and Flagship Directors
- Manager of Corporate Communications

All Executives will be given regular media training which will be facilitated through the office of the Executive Director of Communications.

CSIRO Media Releases (distributed by CSIRO Media) will be drafted by the Divisional Communicators or the Corporate Media Unit, then cleared by the relevant officers in the Division and, where appropriate, external research collaborators.

#### Public Comment on Government or Opposition Policy

Whilst CSIRO staff will often provide objective scientific information to assist the formulation of policy by government, CSIRO staff should not publicly comment on adopted, or proposed, government or opposition policy.

Staff whose duties include advising on or implementing aspects of government policy, should avoid public comment which might conflict with those duties. For example, if government policy appears to be at odds with the science of the day, CSIRO staff should not comment publicly, but raise the issue with the Manager of Government Relations.

#### 3 Public Comment on Scientific Issues

CSIRO staff should limit communication about the scientific aspects of their work to their specific area of expertise. Should the subject matter be sensitive or controversial, the relevant Chief should be informed before any comment is made.

Staff should not comment on scientific matters outside their area of expertise or on non-scientific matters unless they are authorised to do so, or they are very clearly commenting in a private capacity.

Where there are issues on which CSIRO staff hold differing scientific views, every endeavour should be made internally to resolve these differences and to provide a one-CSIRO view. However, it is recognised there will be occasions where there simply are scientific differences of opinion and this should be clearly stated – preferably within a single CSIRO document providing a balanced presentation of the different views. Where appropriate, this document might state that further research is required to resolve uncertainties.

#### 4 Public Comment on Non-Scientific Issues

Staff should be alert when commenting on non-scientific issues relating to their area of scientific research. Comment on scientific matters outside their area of expertise or on non-scientific matters should be authorised or made in a private capacity. If a staff member is commenting in a private capacity, they should state clearly that it is a personal opinion and not an official or unofficial view of CSIRO.

It is particularly important that senior staff take extra care when making public comment in a private capacity as, despite speaking privately, they may be considered representative of CSIRO. Staff who work in non-scientific areas of the Organisation should restrict their public comment to their area of expertise. They should ensure they do not comment on matters considered 'commercial-in-confidence' or issues that are considered by the Organisation to be internal in nature.

#### 5 Public Inquiries (including Parliamentary Inquiries)

Official submissions which address matters on which CSIRO has acknowledged expertise and authority should be forwarded to the relevant Chief prior to submission. Staff are able to make personal submissions to public inquiries, but must not disclose official information without the authority of the relevant Chief, and staff must make it clear that all views are the private views of the individual.

Staff are required to contact the Manager of Government Relations should they be asked to appear before a Parliamentary Inquiry or Committee, or if they have any queries about government processes.

A copy of all submissions is to be provided to the Manager of Government Relations prior to being submitted to Government.

#### 6 External Bodies

CSIRO staff may be asked to serve on external bodies, such as committees of inquiry and reviews of organisations or as members of community organisations. Staff should first establish whether they are being invited as a representative of CSIRO or as an expert individual. If as a representative of CSIRO, staff should ensure comments made are consistent with CSIRO policy and do not disclose information considered 'commercial-inconfidence'. They should seek relevant approval from their Chief to appear or to comment. If staff are acting in a personal capacity, they need to ensure their private status is acknowledged and that the external body cannot say or publish anything attributed to CSIRO.

## 7 Use of Official CSIRO stationery, name, logo and e-mail systems.

CSIRO stationery, e-mail systems, etc. should not be used for any external correspondence in which a private opinion is expressed, and which may give an impression that the comments are authorised by CSIRO.

Any use of the CSIRO name or logo by an individual staff member or third party (other than as part of official CSIRO business) must have the prior approval of CSIRO Corporate Communications.

## Further information

For a copy of the Q&A relating to this policy or for hints on working with the media please visit www.csiro.au/intranet/communication/resources/publiccomment/

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Authorised by Chief Executive

