

Government Relations Policy

Purpose

The policy establishes our position in relation to engagement with local, state and territory, and federal governments, political parties, and politicians and their representatives in support of the achievement of our goals and contributing to helping people affected by breast cancer access the best information, treatment, care and support.

By establishing our expectations for engagement with government, this policy governs all government relations entered into by BCNA, including staff, Board and Consumer Representatives.

Scope

This policy applies to the management of BCNA, BCNA employee, Board Directors, representatives and partner interactions and engagement with:

- Federal government and government departments
- State or territory government and government departments
- Foreign Governments
- Local governments
- Political parties
- Political party candidates

Out of Scope

This policy does not govern the use of BCNA media or electronic and social media for the management of information, statements and releases in relation to government and political engagement. Please refer to our Media Policy and Electronic and Social Media Policy.

This policy does not apply to government relations and political engagement by members of the BCNA network who are interacting or engaging with government, candidates or members of political parties whilst they are not representing BCNA or engaging in regard to BCNA.

Policy Statement

Breast Cancer Network Australia (BCNA) is committed to transparency consistent with good governance and the highest ethical standards. Our team conduct their work with integrity, openness, and probity, and in compliance with relevant local laws, regulations and standards.

BCNA recognises the importance of government relations, including all contact in the course of business with local, state and federal governments.

As we contribute to public political dialogue, we must engage with a diverse array of politicians and government representatives to enable BCNA to deliver on its objectives and purpose – advocating for system and policy change for the benefit of Australians affected by Breast Cancer.

A BETTER JOURNEY FOR ALL AUSTRALIANS AFFECTED BY BREAST CANCER

For this reason, all government relations are conducted accordance with BCNA's Code of Conduct, as well as assessed for levels of risk in addition to other requirements as defined within this policy and supporting policy schedules.

All government relations and political engagement shall be coordinated through our Policy, Advocacy and Support Services team, to ensure that a central point is enabling opportunities to maximise impact of our Government Relations engagement. Where required, approval sought through consultation and risk assessment with the Policy and Advocacy team, CEO and Chair of the Board will be conducted in accordance with the level of risk associated with the engagement, including:

1. Approval from the Board Chair for any high risk engagements,
2. Approval from the CEO for any medium risk engagements,
3. Approval from the appropriate Director based on the engagement type for standard engagements of low risk, and
4. Delegation to staff for transactional, operational or very low risk engagements by one of the Executive members.

All interactions with Government stakeholders will be documented through internal mechanisms with the Policy & Advocacy team, and any high-risk engagement shall be tabled from the policy and advocacy team through to Executive to add to the risk register. This includes request for engagement by BCNA to Government Stakeholders, and requests by Government Stakeholders for comments and statements from any BCNA representative.

Interactions with Government Stakeholders shall be managed in accordance with our Media Policy where applicable and will be documented and recorded through the policy & advocacy team mechanisms for reporting purposes.

Application

This policy is applied within BCNA's operations through the implementation of the Government Relations Procedure as well as the attached policy schedules, which cover:

- Schedule I: Government Relations Guideline,
- Schedule II: Guidance for Political Guests at BCNA Events
- Schedule III: Government Relations Issue Management.

Non-Compliance

There are no exceptions to this policy or the attached Schedules. BCNA may consider breaches of this policy as amounting to serious misconduct that may result in disciplinary action including, but not limited to, suspension or dismissal.

BCNA's Chief Executive Officer (CEO), or their nominated delegate, has complete discretion in relation to the management of breaches of this policy. In accordance with our Disciplinary Policy, BCNA will consider each matter on a case-by-case basis and manage each breach accordingly.

If you become aware that a BCNA representative has breached this policy, you must inform your manager or Executive member.

Related Policies and Documentation

The following documents are referenced within, or related to, this policy and should be reviewed in support of the interpretation and application of this policy:

- Delegation of Authority Policy
- Code of Conduct
- Government Relations Procedure
- Privacy Policy
- Media Policy
- Electronic and Social Media Policy
- Disciplinary Policy.

Policy Administration

This policy is reviewed every three years or earlier as determined by the Approval Authority or Policy Sponsor. Both endorsement by the Policy Sponsor and approval from the Approval Authority must be obtained prior to the implementation of this policy.

Schedule I: Government Relations Guideline

General guidance

BCNA may promote or oppose a position, statement or policy, or any change to any matter of law, policy or practice, as long as this advocacy furthers or aids one of our purposes or outcomes for our members.

All BCNA employees and representatives engaging in government relations must adhere to:

1. This policy and the supporting procedure,
2. The policies of the government department or agency,
3. Our BCNA Code of Conduct and
4. The attached policy schedules.

A central record or log of all engagement with government departments and agencies, and political party representatives is maintained by the Policy and Advocacy team. All approvals to engage, interactions and engagements must be recorded in the log.

A-Political Approach to Government Relations and Political Engagement

Throughout BCNA's undertakings, including government relations and lobbying, our position is for the benefit of our members. At all times BCNA remains a-political, providing fair, equal and transparent opportunities to the relevant parties during our undertakings. This applies to when BCNA agrees with political initiatives, actions and policy, as much as when BCNA disagrees with political initiatives, actions and policy.

All decisions or requests for political engagement or advocacy that are received from government or political parties are escalated to the Board Chair and/or CEO for determination, and then delegated to the relevant levels in accordance with this policy as well as BCNA's Delegation of Authority Policy.

Personal Political Activity

BCNA employees and representatives may choose to engage in lawful political activity outside of their work, however, must be mindful of their role as a BCNA representative and disclose any conflicts of interest to BCNA, whilst following our Conflict of Interest Policy, our Code of Conduct and this Policy.

BCNA does not prohibit the engagement of our employees and representatives in political activity, however it is important that that activity does not potentially, or actually, reflect the position of BCNA in any way. This may include the use of electronic and social media in accordance with our Electronic and Social Media Policy.

Where the BCNA employee is permitted to represent BCNA, additional diligence is required to ensure that any personal political beliefs or activities do not influence any decisions or actions related to BCNA undertakings by any BCNA representative, nor do any personal political beliefs or activities reflect a position of BCNA.

Under these circumstances it is recommended that any public facing profile associated with BCNA does not include any personal and private profiles and activities, including the use of electronic and social media in accordance with the Electronic and Social Media Policy.

Prohibited Government Relations

At no point in time will BCNA actively promote a position solely for the purpose of:

- providing political endorsements
- lobbying on behalf of foreign government/s
- receipt of (or prospect for) political donations or payments
- any other activity deemed as unlawful or in contradiction to this or any BCNA policy.

Political endorsements

BCNA shall not directly or indirectly participate in political activities, nor make payments to political parties, individual politicians or their representatives that could be perceived as supporting one party or is partisan in nature. BCNA or its official representatives shall not endorse political parties or their individual politicians.

Political lobbying on behalf of foreign government/s

BCNA shall not undertake parliamentary lobbying, general lobbying or activities for the purpose of political or government influence on behalf of a foreign government or entity owned by a foreign government.

Political donations

BCNA staff members must not provide any BCNA funding towards political parties or their representatives or utilise BCNA equipment (including email and social media accounts) in a manner that offers or may be seen to offer benefit to political parties or their individual politicians.

Political payments or reimbursements

BCNA shall not make direct or indirect payment or reimbursement of costs incurred by BCNA representatives to attend a political party function - e.g., such as luncheons, dinners, galas or other events - organised for party political purposes such as campaigning or political party fundraising.

Schedule II: Hosting politicians

BCNA Events and Site Visits

Candidates or members of political office may speak at (or attend) BCNA events at the invitation of BCNA or organisations affiliated with BCNA so long as:

- equal speaking opportunities are provided to both major, and other attending, political parties
- BCNA is not indicated as being in support of, or opposition to, a particular candidate or party
- no political fundraising occurs at the event
- no political material or party flyers are distributed at the event
- political party candidates or members do not actively campaign during BCNA events or site visits

- acknowledgements and introductions are made for all parties in attendance at the event, in accordance with the order of precedence protocols applicable to the State or Commonwealth
- the appearance is a speech, a forum or symposium, or a similar format typical of an educational or awareness activity at a not-for-profit organisation.

Requests or invitations to visit our properties and attend BCNA events by candidates or government officials, or for staff invited to be involved with the event on behalf of BCNA at government events, must be agreed in advance with the Director, Policy, Advocacy and Support Services, and the CEO where required, with consideration given (where relevant) to the convenience of our consumers and partners, with the policy & advocacy team who will:

- review the topic of the speech to ensure it is acceptable, where applicable
- provide a briefing to the speaker to ensure compliance with this policy
- liaise with the speaker's media or public relations team (as applicable) to determine roles for communications, announcements and approve quotes in accordance with the BCNA Media policy
- if a spokesperson is required, determine the appropriate spokesperson in accordance with the BCNA Media Policy.

Non-BCNA Managed Events

Where BCNA is in attendance or supporting an event that is managed by another entity or organisation and it is known or anticipated that political party candidates or members will be attending, it is important that our Policy, Advocacy and Support Services team provide guidance to any relevant staff who will be in attendance.

Guidance for the event manager should be on this policy and our requirements regarding the perception of BCNA endorsement and / or association with the political party candidate or member.

Schedule III: Government Relations Issues Management

Where BCNA become aware of any actions, issues or misrepresentations of BCNA, or other breaches of this policy that require action to resolve or correct the circumstances, the following process applies:

