

Wisconsin Public Media Ethical Guidelines

Wisconsin Public Radio (WPR) and PBS Wisconsin are units of the Wisconsin Public Media (WPM) division of the University of Wisconsin-Madison. These guidelines for staff mirror those provided by the University of Wisconsin System and UW-Madison for all employees. This document captures some nuances and expands on those guidelines as they apply to employees of WPM and our unique status as media providers. Additional standards, entitled WPM Editorial Ethics articulate those additional responsibilities that apply to editorial and executive staff.

Conflicts of Interest

The codes of ethics applicable to University staff and the code applicable to academic staff make it clear that employees may not use their position for improper personal financial benefit. The University staff code, however, also states that employees may not engage in “activities which will result in a conflict between the personal interests of a University staff member and that employee’s public responsibilities to the UW System.”

Financial Conflict of Interest

WPM employees involved in financial decisions, such as contracting for services or equipment or committing WPM resources, must be mindful to avoid a conflict of interest or the perception of one. There would be a conflict of interest, for example, if an employee were to engage the services of a family member or a business in which they had a financial interest. If there is a potential for such a conflict, you must fully disclose the details to your supervisor and obtain written approval before committing WPM funds or resources.

Occasionally, WPR or PBS Wisconsin covers or creates content in which an employee or family member has a financial interest or would stand to benefit or be harmed financially from a news piece or program. Employees must recuse themselves from work on programming content in which they have such an interest.

Journalists who cover business and finance have special guidelines for shareholding and market trading of stock and the like when they are privy to insider knowledge. Those guidelines may be found in various guidelines for journalists.

Volunteer Work

WPM benefits from and encourages staff to be actively engaged with the community, including participation on boards of directors for non-profit organizations, as engagement strengthens our community connections. We volunteer in many ways: neighborhood organizations, local advocacy groups, community charities, places of worship, arts groups, hobby/pastime activities, youth athletics, and alumni associations, at schools, libraries and social service agencies. In most cases, our community work is inconsequential to our positions in public broadcasting. Except when we are participating as part of our regular job duties (i.e. an on-air person appearing at a school graduation event) when we volunteer, we must be very clear that we are acting as an individual, not on behalf of WPM. Our association with WPM may be construed as an

endorsement by the organization of an activity. To be certain that these personal commitments do not unacceptably conflict with WPM's public service interests you must confer with your supervisor in advance of becoming involved.

Beyond volunteer work, we are occasionally asked to serve on a board, sometimes because our position in public broadcasting is advantageous to that organization. Here, the same principles apply as for other potential conflicts of interest, especially if you are asked to serve on the board of a partisan or advocacy organization. Those working in journalism and public affairs programming and senior executives may not serve on boards of partisan organizations or those that lobby for partisan public partisan issues. For most staff, it is expected that you let your supervisor know of your prospective candidacy for a board. Journalists and senior executives must review individually and with supervisors, the activities of organizations and prospective public policy positions they may take before they may be approved to serve on such boards.

Outside Professional Employment

The University does not discourage employees from outside employment or involvement with other organizations. However, employees should refrain from outside professional activities that create potential problems, such as:

- interfering with your WPM performance
- having an impact on other employees
- negatively affecting WPM's reputation or credibility
- using WPM resources
- using WPM contacts or clients to the detriment of the organization
- competing with WPM
- representing a conflict of interest with outside parties

The UW has an annual self-reporting process of disclosure that may (after the fact) cover many staff and situations. It is your individual responsibility to consult with your supervisor if there is any possibility that such work may represent a conflict with WPM interests.

Journalists have special obligations regarding outside work and those considerations are covered in various professional guidelines.

Corporate Board Memberships

Staff may serve on corporate boards with the same guidelines noted above. Journalists must be very cautious about such service as WPR/PBS Wisconsin programming may at times present information that is counter to the interests of various corporate entities. Such a circumstance could cause the average person to question the editorial independence of those on the company's board. Journalists and senior executives should generally avoid service on corporate boards and must review prospective service with their supervisor.

Use of Personal Social Media

Social networking sites, such as Facebook, Instagram and Twitter, have become an integral part of everyday life for millions of people around the world. The line between private and public activity has been blurred by these tools; information from your Facebook page, your blog entries, and your tweets - even if you intend them to be personal messages to your friends or family - can be circulated beyond your intended audience. This content, therefore, represents you and WPM to the outside world as much as a news story or talk show does. As in all of your work, the guidelines described in this document should guide you in your use of social media.

Recognize that everything you write or receive on a social media site is public. Any blog, comment or “Facebook like” may be widely seen. Anyone with access to the internet can get access to your activity on social media sites. And regardless of how careful you are online, your professional and your personal life overlap.

As noted above, some activities may be especially problematic for senior executives and employees with responsibility for editorial content – particularly politically charged content – where fairness and the perception of independence and fairness are required. First and foremost we should do nothing that could undermine our credibility with the public, damage WPR/PBS Wisconsin’s standing as an impartial source of information, or otherwise jeopardize our reputation.

Journalists and senior executives may not advocate for political or other polarizing issues online. This extends to or using social media in any form (including your Facebook page or a personal blog) to express personal views on a political or other controversial issue that you could not include for WPR/PBS Wisconsin broadcast or online publication. The exception for this is the “living room” rule: we are all free to discuss and explore any issue in our homes, with our family and friends. Private communications using personal technology and taking place behind security firewalls (e.g., person to person text, or e-mail-or a private message in Facebook) are the electronic equivalent of your living room.

The terms of service of a social media site apply to what you post and gather on that site. The terms might allow for material that you post to be used in a different way than you intended. Also, your simple participation – “friending” or “liking” – in some online groups could be seen to indicate that you endorse their views and used inappropriately.

Social networking websites may offer opportunities for research related to public policy issues or public representatives. For example, a state representative’s webpage may provide an effective resource for understanding their policy positions, travel calendar, etc. Joining online groups may help us gather journalistic information, but we must use caution in making sure to have a balance in “friends” enlisted in research efforts (ex: Recall Governor Smith Facebook group and I support Governor Smith Facebook group.) Care must be taken that participation in such sites does not inadvertently create a perception of affiliation with candidates or those holding office, political parties, etc.

And a final caution - when in doubt, consult with your supervisor.

When posting messages to any work-related or industry-related website or to an internet chatroom or listserv, remember that others may interpret your opinion as WPM's official position, since your e-mail address has "WPR/PBS Wisconsin" in it. Think carefully about what you say and how it might impact our organization.

Don't use public broadcasting social media, e-mail systems or fax machines to send or forward messages which you would not want to see published on the front page of the newspaper with your name, and WPM's name, attached to them. Inappropriate messages include those that might be construed to be in bad taste, or which express personal political points of view, or which express opinions that would be considered inappropriate if assumed to be condoned by WPM. E-mail communication sent on University computers or networks or bearing a University-issued e-mail address is subject to open records requests and may become public.

Social media is a very dynamic ecosystem so we will continue to revise these guidelines.

ETHICS OF FUNDRAISING FOR PUBLIC MEDIA

Separation Between Donors and Content Production

As public broadcasters and as recipients of charitable giving for much of our income, we must scrupulously observe ethical guidelines related to fundraising and our donors.

While good program ideas or other good content may come from any source, under no circumstances will WPR/PBS Wisconsin allow undue or inappropriate influence on our content from any quarter, particularly including funders. Under no circumstances would WPR/PBS Wisconsin accept a gift or corporate sponsorship with the expectation that the funding provided would give a donor or underwriter influence over content decisions or other station activities. This practice, whether intended to encourage or inhibit our work on any topic would undermine the very fabric of our work as public media providers. We accept funding for general operations and funding for specific projects; we do not accept funding with "strings attached" related to the creation or subversion of content or other editorial functions. We place a strong "firewall" between fundraising and content so that it is free from donor influence.

News and public affairs content may not be funded by organizations with a vested interest in the content created or the appearance of an interest. This prohibition to news coverage generally extends to other content areas although in the rarest of circumstances WPR/PBS Wisconsin might find that "policy opponents" might jointly fund a program about a public policy issue. An example might be that the Wisconsin Education Association Council, and, Wisconsin Manufacturers and Commerce association might jointly fund a forum on education policy.

Payola and Plugola

In accordance with federal law and guidelines set down by the Federal Communications Commission (FCC), public broadcasting prohibits the practices known as "payola" and "plugola."

Employees are prohibited from receiving money, services or other valuable consideration for the broadcast of any matter over the station. Violators may be fined, imprisoned, or both and may have their appointment terminated. The selection of music and other creative elements and the selection of guests or individuals or groups (or their work) to be featured, the use of scenic properties and the inclusion in programs of any identification of commercial products or services and their trade names or slogans must be dictated only by the requirements of the program itself.

Station employees may not broadcast matter that directly or indirectly promotes goods, services or works in which the employee (or their immediate family) has a financial interest, without third-party review and without disclosing that financial interest to the station. Violators may be dismissed from their job. Any prospective conflict of interest must be reported to your supervisor.

Content Vetting

Employees with responsibility for editorial content have a duty to vet, to the extent possible, any independently produced material that we air or post. Employees should assure there are no conflicts of interest between the producer and the content, or the in the content itself, that might damage the integrity of WPR/PBS Wisconsin. Generally, programs from established, reliable sources have already been reviewed for editorial content; for example, *All Things Considered* or *Frontline*.

Donor Considerations

Donors are our lifeblood; we strive to build and sustain relationships with our donors, maintaining their confidence and trust that their gifts are used appropriately. We accept only those gifts that comply with WPR/PBS Wisconsin's mission, values and editorial practices and reserve the right to decline gifts that don't meet this threshold. It is critical that we respect our donors and that we are transparent in our fundraising practices and use of their gifts.

To be ethical fundraisers, we work to:

- understand each donor's intent in giving
- comply with donors' wishes in how their gifts are used
- make clear the boundaries between funders and content creation
- protect donor privacy
- appropriately thank and acknowledge our donors
- disclose to the public the names of donors who make gifts targeted to specific projects

For many donors the simple act of giving is considered personal information. In soliciting and receiving contributions we, by necessity, have access to certain personal information about donors, and we have specific guidelines for how we gather, store and share that information. Except as required by law we do not share information internally or externally about the public broadcasting membership or gift amounts of members. Among WPR/PBS Wisconsin fundraising staff, we share donor information on a "need to know" basis.

Unless there is a clear, compelling work-related reason for doing so, it is inappropriate to share donors' names or gift information in general conversation. While we want staff and the public to know that donors make significant investments in public broadcasting, those messages need to be consistent with the interests and preferences of the donors, whether those messages are published or in conversations with friends or acquaintances. Also, it is not appropriate to talk to others inside or outside our organizations about donors' capacity to give or the fact that someone doesn't give or that someone declined to contribute.

We do, however, disclose our major donors, corporate sponsors and grantors on the air, online and in various publications. You can use public information as a guide. If a donor is listed in our program guide, annual report or a press release, this is public knowledge and safe to share with others. Many donors allow us to recognize them as donors but prefer us not to mention their gift amount. We respect these donors' wishes to the extent allowable by the FCC and Corporation for Public Broadcasting (CPB), i.e. public file requirements. Because we want the public to recognize that funders' donations do not influence our content, we rarely accept donations from funders who wish to remain anonymous, and then only preserve anonymity within FCC, CPB and legal restrictions.

WPR/PBS Wisconsin retain and exercise the right to decline gifts for a variety of reasons. Gifts that might appear to be intended to influence content decision, those that might create an unacceptable association (i.e. Ku Klux Klan as an underwriter) and gifts that may bring administrative challenges or financial risk (certain types of real property, gifts with high costs of managing) may be rejected. If a gift is accepted then those restrictions or designations proposed by a donor will in all cases be honored. Not every gift offer is in WPR/PBS Wisconsin's best long-term interests. Fundraisers and management must consider the long-term impacts of prospective gifts as well as their immediate benefits in considering gift options with donors and eventual gift acceptance.

Sometimes our personal service to our community organization involves fundraising, which is generally an appropriate activity for most staff. Can a person closely identified with public broadcasting in a public role fundraise for another organization? Senior managers and fundraising staff should exercise good judgment about prospective fundraising efforts for other organizations. Other staff may have more leeway. Rummage sales, selling raffle tickets and the like are usually fine; however, organizing fundraisers, benefits and soliciting funds in general, and in particular for partisan or advocacy groups could have potential conflicts of interest.

Consultation with supervisors about prospective conflicts over external fundraising activities can help clarify whether such work is appropriate to your role at WPM. Our default should always be to consult with supervisors before committing to such activities.

POLICIES RELATED TO ETHICAL WORK PRACTICES

Non-Business Use of Public Broadcasting funds

All public broadcasting funds are to be used for authorized professional activities only. Under no circumstances may funds or facilities be used for illegal or unethical purposes. Restricted or designated funds, particularly those provided by donors will be used for their stated purpose.

Personal Use of WPM Equipment, Facilities and Supplies

WPM employees have access to equipment, facilities and supplies for their use in carrying out WPM's educational and public service mission. The list includes all production equipment, telephones, station or fleet vehicles, photocopy and fax machines, computers, computer-related networks (such as e-mail, PBS Connect and access to the internet), meeting rooms, stationery and office supplies.

Since these are all the property of WPM, employees are expected to use them responsibly and ethically for organizational business purposes and not for private/personal financial gain or employment. "Incidental" personal use of computers is permitted by UW policy/practice; professional judgment should guide staff use of these resources.

There are times when incidental personal use of some technical equipment, facilities and supplies is permitted, such as a brief phone call to a family member or a doctor, a quick e-mail to a friend, or limited web browsing. But employees should take care that these "off-task" activities do not adversely affect their own or their co-workers' performance or improperly represent WPM to the public. Many of these communications, particularly faxes and e-mail, carry a label that identifies WPM as the source. It is important that the content of each communication be carefully considered so that WPM is not associated with a subject that is ethically questionable or contrary to our mission.

Some examples:

- Letterhead must be used only for business and not for personal matters of any kind.
- Using desktop computers to access the internet must be limited to business purposes with only "incidental" personal use.
- Political activity at work is prohibited. For employees whose job responsibilities do not preclude public political activity, that activity is still prohibited in the workplace and with University property (laptops, cell phones, etc.) Examples include signing petitions, including e-petitions, soliciting signatures, posting political notices, calling or e-mailing an appointed or elected representative or their staff or using copiers to duplicate materials for a cause or a candidate.
- WPM web accounts should not be used for any personal posting.
- Faxing a personal document needed by your insurance company may be OK but faxing a cartoon to a friend is not. Fax and other communications identify WPR, PBS Wisconsin or WPM as their source.

- Don't phone in your personal opinions to a radio talk show from your desk or business cell phone; such comments should be made as a private citizen on a private phone line.
- If you attach a tag or "branding" message to your signature at the end of a workplace e-mail (including any e-mail from elsewhere if using University e-mail domain names), it should be in keeping with WPM's educational mission.
- When you forward an e-mail internally or externally, it carries with it the names of all those who previously received it. Think carefully about whether you want that list of names in circulation.

Nepotism and Intimate Relationships

WPM staff may not participate, formally or informally, in the decision to hire, retain, promote or determine the salary of a member of their immediate family or household, or to anyone with whom they are intimately involved. If you are in a position with potential to become involved in such a decision, you must disclose it to your supervisor and to the WPM's Human Resources Director. Potential conflicts can and will often be resolved by assigning hiring and supervisory responsibilities to an alternate supervisor. Employee contributions to family member performance evaluations must be reviewed and affirmed by a third-party supervisor.

"Intimate relationships" include close personal relationships that would make it difficult to be equitable and objective in making management decisions or might appear to others to make it difficult to be equitable. WPM will neither advantage, nor disadvantage prospective vendors, contractors nor job applicants because of intimate relationships. Disclosure of such relationships at the outset of any professional interaction is required.

Ownership of WPM Work Product

All products of employees' work (including, but not limited to, production materials, ancillary projects, online content, outreach materials, development of "creative" content, etc.) and administrative records created by employees as part of their work assignments are the sole property of WPM. The disposition of these materials will be determined by department managers in consultation with the Director of Radio or Director of Television. Award submissions and awards received are to be based on the workplace, not the individual involved.

Receipt of gifts

Staff may not accept money or anything of value if the payment could reasonably be expected to influence official actions or could be viewed as a reward for any official action or inaction or could be interpreted as influencing their decisions related to their work.

Nominal gifts (T-shirts, mugs, books, trinkets and the like), particularly at holiday time or those distributed at professional meetings are a common practice within our industry. These may be accepted. Similarly, within state and University guidelines, accepting professional hospitality (e.g., a modest meal) from a vendor, client or donor is acceptable, but cannot influence, or appear to influence your decisions. If you are offered a substantial gift from a vendor, client, donor, or other business associate, you must notify your supervisor about the offer and relevant

circumstances. You must receive your supervisor's approval, in writing, before accepting the gift unless the gift is immediately donated to a charitable cause.

These ethical practices are in alignment with University, public broadcasting, non-profit and general business practices. They are routinely reviewed and revised.

RESOURCES FOR FURTHER INFORMATION

If you have questions, concerns, suggestions please contact your supervisor, or WPM's Human Resources Director who can facilitate a discussion.

UW System and State of Wisconsin Policies

[For Academic Staff](#)

[For University Staff](#)

[For ECB Staff](#)

Media Guidelines

[National Public Radio Ethics Policy](#)

[PBS Editorial and Funding Standards](#)

[CPB Regulations Regarding Donors](#)

[Public Media Code of Integrity](#)

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