



## **Policy Regarding Telefilm Outside Readers (Feature Film)**

### **1. Object**

Telefilm Canada ("Telefilm") is a federal Crown corporation that imposes upon itself various obligations, notably adhering to the highest standards of ethical conduct in all of its activities, services and programs. Consequently, Telefilm has established this policy for outside readers. This policy is designed to conserve and enhance public confidence and trust in the integrity, objectivity and transparency of Telefilm and its decision-making process. It is designed to reduce the possibility of an outside reader using or appearing to use the outside reader engagement to gain an unfair advantage over other applicants.

### **2. Concerned individuals**

This policy concerns all outside readers working for Telefilm, notably in the course of script reading and analysis. For the purpose of this policy, an outside reader is a person who is not an employee of Telefilm and who is therefore not subject to the Conflict of Interest and Post-Employment Code for Telefilm employees.

### **3. Prohibitions**

- 3.1 An outside reader must not knowingly act as an outside reader for Telefilm on a project for which he or she is Associated in any way (as defined below).
- 3.2 An outside reader is "Associated" with a project if the outside reader:
  - has or has had an interest in, or is or has been involved in any way with the project (as a producer, holder of an interest (directly or indirectly) in the production company or creative material, as a script writer, story editor, consultant, or otherwise), or
  - has or has had a connection with the project or project personnel which may, in Telefilm's opinion, create a real, potential or apparent conflict of interest (see Section 4).
- 3.3 Furthermore, if an outside reader is Associated (as defined above) with a project which the outside reader knows will be or knows is likely to be submitted to Telefilm within the next two months, he or she must not act as an outside reader for Telefilm on a project in a Competing Category (as defined below).
- 3.4 A "Competing Category" means a category of project which may compete for the same Telefilm funding, such as, low budget feature film (a film which may request up to \$200,000 from Telefilm for production funding), regional feature film (a film which may request from \$200,000 to \$1 million from Telefilm), and a national feature film (a film which may request more than \$1 million from Telefilm). The category of project will be provided by Telefilm to the outside reader.

#### **4. Obligation of Disclosure and Determinations**

An outside reader must disclose to Telefilm in writing, the details concerning any of the prohibited circumstances described in Section 3 above. For clarification, e-mail is sufficient for all written communications with Telefilm required under this policy.

If an outside reader has any questions concerning the interpretation or applicability of the prohibitions set out in Section 3, such questions should be submitted in writing for a determination.

Such disclosures and questions must be submitted to Telefilm as soon as the assignment is made or the creative material is provided to the outside reader so that Telefilm can make a determination as to whether or not the outside reader should proceed with the analysis, or whether the material should be returned to Telefilm. Telefilm determinations shall be entirely at Telefilm's discretion and shall be provided in writing.

In the event that the outside reader becomes aware of a conflict (as described above), of which the outside reader was previously unaware, the outside reader shall immediately inform Telefilm of such conflict in writing.

#### **5. Restriction on Submissions**

Telefilm will refuse to analyze an application for a project Associated with the outside reader which is submitted in violation of the restriction set out in Section 3.3, and such project application may only be re-submitted at the earliest, at the end of the two-month restriction period.

However, some exceptions regarding the restriction period may be made in special circumstances, provided that such exceptions are ratified by all regional Directors as well as by the Executive Director of Telefilm.

#### **6. Release of Information**

Telefilm provides outside reader reports upon request to those who have submitted creative material. Telefilm does not normally disclose the names of the outside readers in connection with such requests. However, Telefilm is subject to the Access to Information Act and in accordance with such legislation, the outside reader's name may be released in connection with the outside reader report.

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