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Social Media Policy



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PURPOSE

These Standard Operating Procedures (SOPs) have been developed to guide Guardian Venue Management International (GVMI) employees and their use of social media. It is important that employees are aware of and understand their responsibilities relating to the use of social media and the reputation and goodwill of GVMI.

The objective of this policy is to ensure employees:

- Are aware of the risks associated with social media
- Understand their professional responsibilities in managing the risks associated with social media
- Are aware of their boundaries of providing commentary, views, or material on behalf of GVMI
- Understand that any commentary, views or material posted or released by unauthorised personnel will have disciplinary action brought against them

This Social Media Policy is to be used in conjunction with the GVMI Codes of Practice and Communication with Media Policy.

SCOPE

These operational procedures apply to all GVMI employees and sub-contractors.

REFERENCES

- Human Right Act 2004 (NSW)
- Information Privacy Act 2009 (NSW)
- Equal Opportunity Act 2010 (NSW)
- Privacy and Personal Information Protection Act 1998 No133 (NSW)
- Anti-Discrimination Act 1977 (NSW)
- Code of Conduct (NSW) 2009 Attorney General's Division
- Copyright (Act 1968) of the Commonwealth
- Sex discrimination Act 1984
- Fair Work Act 2009 (Cth)
- Defamation Act 2005 No77 (NSW)



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RESPONSIBILITY

Senior Management	<ul style="list-style-type: none">•
Integrated Management System Representative (Compliance & Operations Manager)	<ul style="list-style-type: none">• All senior managers are expected to lead by example and address any misuse of social media that goes against the GVM I Code of Conduct.
All GVM I employees and subcontractors	<ul style="list-style-type: none">• All employees and subcontractors should be aware of their roles and responsibilities under the GVM I Code of Conduct.

ACTION / COMPLIANCE

Failure to comply with this policy may also breach compliance with existing workplace policies and legislation, such as sexual harassment, discrimination or bullying, constituting a breach of employment or contractual obligations.

Employees or sub-contractors who have failed to meet the requirements set out in this policy may face disciplinary action, which may result in termination of employment or contract terms.

IDENTIFYING INAPPROPRIATE USE

Employees who are or become aware of, content that breaches the conditions of this policy or is considered unlawful or inappropriate and may impact an employee, client or customer either directly or indirectly, should report the publication immediately to GVM I management on (02)9793 3577 or via email to info@guardianvm.com.au

DEFINITIONS

7.1 Social Media

“website and applications that enable users to create and share content or to participate in social networking” (Oxford Dictionary).

Social media includes but is not limited to:



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- Social networking sites (example Facebook, Instagram, Snapchat, Tumblr, Twitter, and LinkedIn)
- Video and photo sharing websites (example Flickr, Tiktok, Pinterest and YouTube)
- Blogs, including corporate blogs, personal blogs and those hosted by media outlets (for example 'comments' or 'your say' feature on 2gb.com.au)
- Micro-blogging (for example Twitter, WorkPress.com(org), Wix.com, Typepad.com and Postach.io)
- Wikis and online collaborations (for example Wikipedia)
- Forums, discussion boards and groups (for example Google groups, Whirlpool)
- Video and podcasting
- Online multiplayer gaming platforms (for example World of Warcraft, Second life, FIFA, Fortnite, GTA, Call of duty 'COD')
- Instant messaging (including SMS, WhatsApp, Telegram, Viber, Kik, Wechat, Skype)
- Geo-spatial tagging (Foursquare)

Social media also applies to any other emerging electronic or digital communication applications.

7.2 Employees

For the purposes of this policy the term "employees" will include permanent staff and managers, contractors, and temporary staff.

PROFESSIONAL USE OF SOCIAL MEDIA

Gaining authorisation to make comments on behalf of GVMI:

- Employees are not permitted to provide or post views, commentary, or material on behalf of the company without being nominated as a company spokesperson
- Before expressing any views, commentary or postings as a company spokesperson, an employee must gain authorisation.
- Only employees with the explicit permission and authorisation from the Company Director may act in the role of a spokesperson on behalf of the company, once permission is granted, they individual may express views, commentary or post material on the company's behalf.

AUTHORISED REPRESENTATIVES

Authorised Spokespersons, who provide and post views, commentary, and material about the



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company, must apply the following parameters when representing GVMi as an authorised spokesperson:

- Disclose they are an employee of GVMi and use only their true and legal identity
- Only express views and commentary that have the approval of the Company Director
- Ensure that the views and commentary expressed are accurate and not intended to mislead, while still complying with relevant GVMi Policies and legislative requirements.

Authorised spokespersons are **not** to:

- Respond or post commentary or material that would be considered offensive, harassing, obscene, bullying, sexist, racist, defamatory, threatening, discriminatory, constitutes a contempt of court, breaches a court suppression order or is otherwise unlawful
- Disclose or reveal any sensitive, secure, or confidential employee, client or company information
- Provide commentary or postings which may bring the reputation and goodwill of GVMi into disrepute.

PERSONAL USE OF SOCIAL MEDIA

While every endeavour is made to protect the reputation and goodwill of our employees, clients, customers and the company on social media, the intention of this policy is not to discourage employees expressing their personal views or activities on social media networking or other on-line platforms.

However, employees need to be aware of and understand the implications and impacts their personal views, commentary or material posted on social media networks can have, either directly or indirectly, on the reputation and goodwill of peers, clients, customers and the company. Compliance with this policy will minimise the risks and related consequences, of employees using social media networks or other on-line platforms.

Employees are responsible for any content that they make available to the public domain on social media networks and other on-line platforms. It is the responsibility of the employee to ensure they are aware of the privacy and security settings, on the social media networks and other on-line platforms they are using and ensure none of those settings breach their obligations set out in this policy.

Employees who are in doubt, unaware of or do not understand their obligations set out in this policy should contact GVMi management for guidance.



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10.1 Avoid breaching this policy:

- Do not discuss information that is not public knowledge or has not been made available in the public domain by either co-worker, GVM I clients, their customers or GVM I.
Example: would be rates of pay made by GVM I to peers or contractors.
- Ensure the views and commentary being expressed are true, do not mislead and comply with existing company policies and state and federal legislation
- Explicitly state that the views and commentary being expressed are your own and in no way reflect the views or commentary of GVM I or our clients. Example statement: “the views and comments reflected in this publication are those on John Smith and in no way reflect the views, commentary or dealing of Guardian Venue Management International or their clients.”
- Behave in a manner that is polite, respectful, and socially acceptable by members of the community.
- Adhere to the obligations reflected in this social media policy, state and federal legislation including other existing policies implemented by the company and set out in the GVM I Codes of Practice

10.2 Employees must not:

- Post material considered to be offensive, defamatory, harassing, racist, sexist, infringes copyright, incites violence or violent acts, or would otherwise be considered unlawful.
- Imply or give the impression that they are an authorised spokesperson or company representative and that the views, commentary, or material they have expressed are those of GVM I or our clients
- Use the identity or likeness of another employee
- Use the GVM I logo or any GVM I branding to give the impression that GVM I or their clients have the endorsement or official support for their personal views or comments
- Disclose confidential information of employees, clients or customers obtained while in the employ of or performing duties for, the company
- Post any comments or material that might be interpreted as threatening, discriminatory, harassment or bullying toward another employee, client, or customer
- Post comments or material that might otherwise bring the company’s reputation and goodwill into disrepute.



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GUIDANCE TO NAVIGATE LEGAL ISSUES

The following guidance has been offered to assist employees in complying with the obligations set out in this policy. When in doubt, contact GVM I management for further assistance.

11.1 Privacy, confidentiality and legal issues

- Users should never publish or report confidential conversations, information, or internal processes
- Ensure the use of personal information of co-workers and GVM I clients, obtained through the course of nominated duties, comply with GVM I's Privacy Policy as well as state and federal legislation.
- The disclosure or release of client or employee personal information is prohibited and will result in disciplinary action, which may lead to criminal charges and termination of employment or contractual obligations.

11.2 Copyright

- Employees must abide by the obligations set out in the legislation and fair use of copyrighted material
- All employees must acknowledge the original author/source attributed to the work whenever possible.

11.3 Harassment and Bullying

- Anti-Bullying and Workplace Conflict Policy are applicable in both the physical and on-line workplace
- Workplace harassment and bullying are not restricted to comments and actions made during hours of employment. Workplace harassment and bullying extends to include comments published on social media and on-line platforms, outside hours of employment, relating to GVM I employees, clients and their customers
- Threatening, abusive, defamatory or harassing publications are in breach of this policy and may result in disciplinary action taken.
- Respect and dignity are expected of all employees. Behaviour that constitutes bullying or harassment will not be tolerated and may result in disciplinary action taken



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11.4 Defamation

Employees should not publish material that may harm the reputation, perception or goodwill of another person, organisation or GVMI, and should obtain legal advice prior to publication if they deem the publication necessary.

11.5 Offensive or Obscene material

Material published on social media or other on-line platforms that are considered offensive or obscene, may breach on-line state and federal classification laws, if the material is considered to be of a pornographic, sexually suggestive, harassing, hateful, abusive or discriminatory manner.

11.6 Contempt of Court

Employees must exercise due diligence when referring to pending court proceeding on social media and on-line platforms. Published material may prejudice those proceedings, so it is recommended that enquiries are made ensuring no court suppression orders are in effect, prior to expressing personal views, commentary or posting any material, irrelevant if the case has passed or is pending.

13 Version Control

Document Version	Published	Author/s	Amendments
Ver.1			

