

COMMUNICATIONS POLICY

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Responsible person	General Manager	Scheduled review date	July 2022

INTRODUCTION

Consistency in communication output, style and timing is essential in positioning the organisation as credible and professional. This policy defines the manner and guidelines that NSW Greyhound Breeders, Owners and Trainers Association (NSW GBOTA) has adopted to ensure its communication is consistent across all tracks with our organisational values.

PURPOSE

To define the key elements of appropriate professional communication by NSW GBOTA Head Office, track sites, between staff, volunteers and key stakeholders.

The NSW GBOTA manages, operates and conducts greyhound racing at:

Appin, Bathurst, Bulli, Gosford, Gunnedah, Lismore, Maitland, Temora and Wentworth Park

The NSW GBOTA works with the media in order to

- advocate for the goals of the organisation
- promote the work of the organisation
- inform the public of the details of the organisation
- engage partners and sponsors for the organisation

In order to ensure that these purposes can be fulfilled, this policy provides guidelines for the people entitled to speak for the NSW GBOTA, employees and members.

Media outlets, their representatives and freelance journalists/commentators have a vital role to play on behalf of the community in holding the NSW GBOTA to account for its policies and actions. It is important that they have access to officers and members and to background information to assist them in this role.

In line with this, the NSW GBOTA must exercise its right of reply to any inaccurate or unsubstantiated reporting, broadcasting and criticism, by providing factual and concise commentary without opinion or emotion attached.

It is the responsibility of all employees, board members, partners and volunteers to ensure that effective media relations are maintained in order to achieve the goals set out by NSW GBOTA. Naturally, in doing this, certain legal constraints might apply (e.g. not making comment on current court cases, especially those before a jury). In some cases and certainly those of a serious nature, NSW GBOTA will refer to one member of Management or Staff for comment and only this person should provide any comment.

Social Media platforms have become increasingly necessary in the delivery of prompt and frequent content and communication. The NSW GBOTA may choose to engage in any number of social platforms, with engagement criteria outlined within this policy applicable across any and all social networking sites, apps and channels, both visual and textual.

Content should be in keeping with the image that the NSW GBOTA wishes to present to the public and should not represent the personal opinion of the author or bring the organisation into disrepute in any way.

This policy also sets out guidelines for acceptable use of the computer network, including internet and email, social media by employees, representatives and volunteers of NSW GBOTA. Access to internet and email is provided to NSW GBOTA employees, representatives and volunteers for the primary purpose of assisting them in carrying out the duties of their role. The Communications Policy has regard for Privacy and the management of Media relationships.

Further, the policy shall clarify the status of material subject to copyright used by the organisation, and to remove any possible misunderstandings about ownership of copyright.

The NSW GBOTA's communication shall be consistent with the following core values:

- Timing: NSW GBOTA staff will communicate in an appropriate, reasonable and timely manner with all NSW GBOTA stakeholders.
- Professionalism: NSW GBOTA staff represents the organisation as a whole and should seek to maintain a professional and uniform tone. Refer to Track Communications Procedures

Staff may use the internet and email access provided by NSW GBOTA for:

- Any work and work-related purposes;
- Limited personal use (for details see Procedures, below);
- More extended personal use under specific circumstances (for details see Procedures, below).

The NSW GBOTA retains the right to gain access to any computer, device or account associated with the NSW GBOTA Operations, including Branches. As such data should not be regarded as private in nature, under all circumstances.

Material created by employees of NSW GBOTA in the course of their employment, irrespective of whether it is created using NSW GBOTA facilities or materials, or during normal working hours, remain the intellectual property of NSW GBOTA. What constitutes the course of employment will be determined by the employee's position description and usual duties.

Works by independent contractors and volunteers shall be owned in accordance with the written contract under which the work was created. The NSW GBOTA shall ensure that there is a written contract for work by an independent contractor or volunteer specifying ownership. At law, unless a written contract specifies otherwise then independent contractors and volunteers will own copyright in everything that they create.

Any dispute between the NSW GBOTA and its staff, contractors or volunteers; or between staff; or between contractors; or between volunteers, on issues of intellectual property ownership shall be determined by the organisation's dispute resolution procedures. Such determination will be subject to the judgement of any court or tribunal.

Finally, given NSW GBOTA size and network locations, electronic document retention management needs to meet multiple objectives:

- that email retention does not materially degrade IT system performance;
- that important emails remain accessible for operational purposes;
- that legal document retention requirements are met; and
- that Privacy Act obligations to delete certain personal information is complied with.

Further detail is outlined in the policy responsibilities and procedures.

DEFINITION

Electronic media includes all electronic devices and software provided or supported by NSW GBOTA, including, but not limited to, computers, electronic tablets, peripheral equipment such as printers, modems, fax machines, and copiers, computer software applications (including software that grants access to the internet or email) and telephones, including mobile phones, smartphones and voicemail systems.

RESPONSIBILITIES

The NSW GBOTA has many varied stakeholders including general public; government departments and officials; corporate sponsors; media organisations; sport organisations along with NSW GBOTA staff, participants and patrons. To help deliver a consistent quality of interaction for our stakeholders a standard communication protocol is considered a valuable aid.

The General Manager and the Board Chair are authorised to speak on behalf of NSW GBOTA.

Other staff, Board members and volunteers are advised to ensure they are properly briefed and guided by the General Manager or Board Chair before talking to the media on any issue related to NSW GBOTA.

Where information or public comment is requested or required, the General Manager shall determine the most appropriate person to respond.

Staff, Board members, volunteers and third parties, are encouraged to make clear representation where they are or are not authorised by the organisation.

All staff, Board members and volunteers must observe NSW GBOTA's Privacy Policy in relation to records.

Staff and volunteers may, from time to time and where appropriate, post on behalf of the NSW GBOTA using the organisation's online social media profiles. This is to be done only with the express knowledge and authorisation of the General Manager, or respective agents and in line with guidelines / templates provided. The General Manager has ultimate responsibility for:

- Ensuring that all posts are in keeping with NSW GBOTA's core Communications Policy.
- Ensuring appropriate and timely action is taken to correct or remove inappropriate posts (including defamatory and/or illegal content) and in minimising the risk of a repeat incident.
- Ensuring that appropriate and timely action is taken in repairing relations with any persons or organisations offended by an inappropriate post.
- Moderating and monitoring public response to social media, such as blog comments and Facebook replies, to ensure that trolling and spamming does not occur, to remove offensive or inappropriate replies, or caution offensive posters, and to reply to any further requests for information generated by the post topic.

It is important to maintain the balance between encouraging discussion and information sharing, and maintaining a professional and appropriate online presence.

DELEGATION

Social media is often a 24/7 occupation; as such, such responsibilities as outlined above may be delegated by the General Manager or respective Venue Manager to another appropriate staff member/volunteer.

PROCESSES

Significant statements on behalf of the NSW GBOTA shall be made as authorised by the General Manager or Board Chair as detailed above.

It should always be prefaced whether the views put forward regarding any issue relating to the NSW GBOTA are those of the organisation or of an individual. At all times consideration should be given as to how the correspondence may affect the reputation of the NSW GBOTA.

The General Manager is responsible for:

- Oversight of key contacts for distribution to local press and radio and TV stations. Relevant employees or representatives may be contacted for preliminary discussions on any story or if a journalist or researcher is unsure who to approach for a comment.
- Coordination of the organisation's relationship matrix, this shall be consistent with the organisation's business and marketing plans.
- Coordinating all media conferences for NSW GBOTA. All such conferences shall be properly recorded and documented by the organisation.
- Authorising all media releases from the NSW GBOTA, and for mounting them on the organisation's website. All media releases must also be fact checked and approved by staff in charge of the relevant area before distribution.
- Being involved in any approaches to the media to feature NSW GBOTA's work.
- Receiving and coordinating a response to all approaches from all national press, radio or TV stations or specialist press.

All staff, Board members, representatives and volunteers are responsible for:

- Providing advice (preferably before the issue becomes public knowledge) to the General Manager on any issues that are likely to be complex or contentious or to be sustained for any length of time. In such a situation the Communications Officer will work with the relevant staff and Board members to produce a communications plan which will ensure that balanced, timely information is provided to keep all parties informed.
- Ensuring that no photos of clients, patients, employees, agents or students shall be released to the public via advertising, news media, or internet, or by any other means, without the approval of the General Manager, who shall satisfy themselves that the organisation's Communications Policy, in particular privacy, and release requirements have been observed.
- Notifying the General Manager of any contact made in the name of the NSW GBOTA to the media and providing the name of the reporter or writer and the media outlet they represent.

Any significant media contacts with the NSW GBOTA's staff or members on any issue likely to prove contentious shall, where possible, be recorded.

Any filming or taping on NSW GBOTA's property or of the organisation's proceedings by the media is subject to prior permission of the General Manager or their agent and Venue Manager (Wentworth Park Trust).

Every effort should be made to assist the media in their inquiries. Where media queries involve requests for information that will require substantial staff work to produce, such work must be authorised by the General Manager. It will usually be necessary to provide information in addition to that which is requested in order to set the facts and figures in context. Requests for detailed information of this nature, whether from the local or national media, should be referred to the General Manager.

The NSW GBOTA reserves the right to withhold certain sensitive information that is not required to be public record. (e.g. commercial transactions or governmental negotiations). Any such information will be clearly labelled and clearly notified to relevant staff.

If any unauthorised release of confidential information occurs, an investigation will take place to establish who was responsible and appropriate action will be taken.

Posting to social media

Before social media posts are made, volunteers and staff should ask themselves the following questions:

- Is the content I am posting, sharing or reposting, relevant and likely to be of interest NSW GBOTA's members and stakeholders?
- Is the content in keeping with the interests of the organisation and its constituted goals?
- Could the content be construed as an attack on another individual, organisation or project?
- Would NSW GBOTA's sponsors, partners and stakeholders be happy to engage and be associated with the post?
- If there is a link attached to the post, does the link work, and have I read the information it links to and judged it to be an appropriate source?
- If reposting information, is the original poster an individual or organisation that NSW GBOTA would be happy to associate itself with?
- Are the tone and the content of the post in keeping with other posts made by NSW GBOTA? Does it maintain the organisation's overall tone?

If you are at all uncertain about whether the post is suitable, do not post it until you have discussed it with the General Manager or Management Committee. A few moments spent checking can save the organisation reputational damage in the future.

DAMAGE LIMITATION

In the event of a damaging or misleading post being made, the General Manager should be notified as soon as possible, and the following actions should occur:

- The offending post should be removed.
- Where necessary an apology should be issued, either publicly or to the individual or organisation involved.
- The origin of the offending post should be explored and steps taken to prevent a similar incident occurring in the future.

If the offending content continues to gain momentum, or to cause significant damage to the organisation's reputation, revert to the Communications Policy.

MODERATING SOCIAL MEDIA

The reputation of the NSW GBOTA is first and foremost, and this involves maintaining a safe and friendly environment for its members.

From time to time social media forums may be hijacked by 'trolls' or 'spammers', or attract people who attack or degrade other posters or the organisation aggressively. In order to maintain a pleasant environment for everybody, these posts need to be moderated.

Freedom of speech is to be encouraged, but if posts contain one or more of the following, it is time to act:

- Any use of profanity
- Defamatory, slanderous or aggressive attacks on NSW GBOTA, other individuals, organisations, projects or public figures
- Copyrighted material not within reasonable use, in the public domain, or available under Creative Commons license
- Breach of data protection or privacy laws
- Repetitive advertisements
- Topics which fall outside the realms of interest to members and stakeholders, and which do not appear to be within the context of a legitimate discussion or enquiry.

If a post appears only once:

- Remove the post as soon as possible
- If possible/appropriate, contact the poster privately to explain why you have removed the post and highlighting NSW GBOTA's posting guidelines.

If a Director, employee, volunteer or Member continues to post inappropriate content, or if the post can be considered spam:

- Remove the post as soon as possible
- Ban or block the person to prevent them from posting again
- Report the user to the relevant platform authority if requested by any user, or if the organisation feels threatened in any way

Banning and blocking should be used as a last resort only, and only when it is deemed clear that the poster intends to continue to contribute inappropriate content.

The decision to block, ban and remove posts ultimately lies with the General Manager, but may, at their discretion, be delegated to responsible staff and volunteers.

Unacceptable use

It is not appropriate for any employee to be posting to their personal account during time of employment (each shift). Further, staff should be mindful of comments on social media which relate to work matters or events. Where in doubt they should seek guidance from their Manager.

INTERNAL COMMUNICATIONS

Format

Communication may occur on a formal or informal basis. However formal communication via memorandums, letters or emails should occur to document discussions addressing key objectives relating to NSW GBOTA operations. Refer to the attached standardized templates and documents, to be used with all relevant communications.

Communication should always be direct, open, honest and respectful. In line with supporting the mandate that NSW GBOTA values people and animal welfare; personal interaction is encouraged. Written communication, whether electronic or paper, must meet acceptable levels of Australian – English, spelling, grammar and punctuation.

NSW GBOTA staff are ambassadors for NSW GBOTA whenever they communicate with external stakeholders who include the general public, government departments and officials; corporate sponsors; media organisations; sport and participants. External communication should follow the formal guidelines set out below;

- Style as with internal communication guidelines.
- Size 12 Calibri
- Black or Navy text
- Format NSW GBOTA communications to stakeholders should be consistent utilising NSW GBOTA approved templates only (i.e. letters, memo's, emails).

Formal Communications

These occur during structured meetings. Examples of these include:

- Staff meetings
- Departmental meetings

- Organised work groups
- Staff reviews

Informal Communications

The nature of the NSW GBOTA operating environment lends itself to informal communications. Communication in this manner should follow the guidelines outlined above. E-mail communication is considered legal correspondence and content should therefore meet all guidelines.

Timing

If a party receives a communication that cannot be responded to immediately receipt must be acknowledged as soon as practical. Ongoing or at least regular communication is encouraged to ensure there is effective transfer of knowledge and information.

Branding Consistency

As outlined above, NSW GBOTA representatives should present external stakeholders with a consistent message. The NSW GBOTA brand sends key messages to our stakeholders about who NSW GBOTA is and what NSW GBOTA stands for – Providing services and excellence of knowledge to the Greyhound community, including breeders, owners and trainers. The NSW GBOTA is dedicated to support, inform and educate our members to develop and enhance the greyhound racing industry through ethical practices.

The NSW GBOTA brand and individual logos are represented on the track websites, letterheads, business cards, strategy booklets, signage and clothing.

Media Relations

NSW GBOTA Corporate Communications staff is the primary contact for media requests or activations. This is to ensure:

- Consistency of message
- Efficient management of requests for information
- Manage interviews with NSW GBOTA

The NSW GBOTA is represented in the media by the General Manager or persons nominated by the General Manager. The General Manager represents NSW GBOTA in all matters around:

- Policy decisions
- Investment and funding decisions
- Organisational opinion or stance

Track Managers should make themselves available to the media to promote their successes as a result of the support provided by NSW GBOTA.

Limited personal use

Limited personal use of computer, internet and email facilities provided by the organisation is permitted where it:

- Is infrequent and brief;
- Does not interfere with the duties of the employee or his/her colleagues;
- Does not interfere with the operation of NSW GBOTA;
- Does not compromise the security of NSW GBOTA or of its systems;

- Does not compromise the reputation or public image of NSW GBOTA;
- Does not impact on the electronic storage capacity of NSW GBOTA;
- Does not decrease network performance (e.g. large email attachments can decrease system performance and potentially cause system outages);
- Corresponds to the procedures outlined in the Email Maintenance and Archiving Procedures document;
- Conforms to the practices for file management and storage outlined in the Technology Procedures Manual;
- Incurs no additional expense for NSW GBOTA;
- Violates no laws;
- Does not compromise any of the confidentiality requirements of NSW GBOTA;
- Does not fall under any of the “unacceptable use” clauses outlined below.

Examples of what would be considered reasonable personal use are:

- Conducting a brief online banking transaction, or paying a bill;
- Sending a brief personal email, similar to making a brief personal phone call.

Permitted extended personal use

It is recognised that there may be times when staff need to use the internet or email for extended personal use. An example of this could be when a staff member needs to use the internet to access a considerable amount of material related to study they are undertaking.

In this case, it is expected that:

- The staff member advise and negotiate this use with their manager beforehand in order to obtain the manager’s approval;
- The time spent on the internet replaces all or part of a staff member’s break/s for that day, or that they adjust their timesheet accordingly for that day.

Access to electronic data

The NSW GBOTA may need to access any and all information, including computer files, email messages, text messages and voicemail messages. The organisation may, in its sole discretion, authorise its staff to inspect any files or messages recorded on its electronic media at any time for any reason. Where use of the organisation’s equipment or software requires the use of a password, this should not be taken to imply any right of privacy in the user. The organisation may also recover information that a user has attempted to delete, and staff should not assume that such data will be treated as confidential.

Unacceptable use

Staff may not use internet or email access (including internal email access) provided by the NSW GBOTA to:

- Create or exchange messages that are offensive, harassing, obscene or threatening;
- Visit websites containing objectionable (including pornographic) or criminal material;
- Exchange any confidential or sensitive information held by the NSW GBOTA (unless in the authorised course of their duties);

Copyright notice

Staff and volunteers of NSW GBOTA should ensure that every publication of NSW GBOTA, including any books, newsletters, brochures, forms, reports and computer software contains the following statement:

This statement should not be included in normal business letters, invoices and receipts.

Use of copyright material

Staff and volunteers of NSW GBOTA are required to observe all applicable copyright laws and regulations.

Staff and volunteers of NSW GBOTA may use copyright material belonging to or licensed to NSW GBOTA only for the purposes of their work for NSW GBOTA. Where the material is used by NSW GBOTA under licence, staff and volunteers must act in accordance with that licence.

Staff and volunteers of NSW GBOTA may not reproduce, publish, distribute or adapt third party copyright material in the course of their work for NSW GBOTA without the authorisation of the copyright owner. Staff and volunteers may not download or reproduce text, photographs or illustrations found on the internet without authorisation of the copyright owner. This includes for use in internal or external newsletters, reports or presentations. All non-generic images and illustration should be sourced from and with the consent of the creator. Generic images may be obtained from a stock image supplier (e.g. Getty Images, iStock (by Getty Images), Adobe Stock, PixaBay, NegativeSpace, Picjumbo, Burst (by Shopify), Unsplash etc.).

When reproducing or otherwise using third party copyright material, it cannot be assumed that just because something is on the internet that it is free for everybody to copy and use. This includes images on Facebook or photo sharing websites such as Flickr. Acknowledgement of source of the material does not overcome the need for authorisation; actual authorisation is still required.

COPYRIGHT ON NSW GBOTA MATERIALS

All materials produced by or on behalf of NSW GBOTA are subject to copyright. Permission to reproduce such materials depends on the category into which they fall.

All materials produced by or on behalf of NSW GBOTA will be classified by the General Manager into one of the following classes:

1. Those materials that are copyright and that cannot be reproduced by any process other than for the purposes of and subject to the provisions of the Copyright Act and any licensing agreement between the user and NSW GBOTA.
2. Those materials that are copyright and that may nonetheless be circulated and/or reproduced as long as any reproduction features specified credits and disclaimers.
3. Those materials that are copyright and that may nonetheless be reproduced without conditions.
4. Those materials that are not copyright.

The copyright policies of NSW GBOTA are binding on all staff, whether paid or voluntary. The copyright policies of NSW GBOTA, as amended from time to time, shall be deemed to be a part of the conditions of employment of every employee and shall be included in the orientation material given to every volunteer.

MORAL RIGHTS

Where it is reasonable to do so, staff and volunteers of NSW GBOTA should ensure that:

- a) When reproducing any written material, photograph or illustration, the creator should be acknowledged where it is appropriate to do so. It is generally appropriate to acknowledge the author of a report or article in a newsletter, but it is not appropriate to acknowledge the creator of a marketing brochure or promotional flyer, or where it is desirable for operational reasons that

correspondence be sent out in the name of somebody else (such as in the name of a director, executive or manager).

- b) When reproducing any written material, photograph or illustration, a person should not be falsely attributed as the creator unless it is reasonable to do so. For example, some correspondence may need to go out in the name of a director, executive or manager even though it was written by somebody else.

Within the Communication Policy clear direction of the recording of official files is outlined. The first step is to consider with the filing of digital material, is whether there is a particular legal obligation to retain the email for a minimum period of time. The email can then be classified NSW GBOTA's internal purposes as one of:

1. Material of permanent significance (perpetual)
2. Administrative correspondence (5 years)
3. Fiscal correspondence (5 years)
4. General correspondence (2 year)
5. Passing correspondence (retain until read and acted upon, then destroy)

The email should then be retained for the longer of the minimum legal period and the period set down in NSW GBOTA's internal classification.

CLASSIFICATION OF CORRESPONDENCE

1. Material of permanent significance

Material that requires permanent retention include:

- any material required to be retained in accordance with legal obligations (see further explanation below under the heading, 'Legal Requirements');
- items of historical significance to the organisation;
- emails creating or recording permanent legal relationships; and
- items recording significant policies or precedents.

To ensure material of permanent significance is retained in an accessible format, they should be sent to gbota@gbota.com.au. Users should copy (cc) to this address when receiving or sending such email. Retention of such material will be administered by the IT officer.

2. Administrative Correspondence

NSW GBOTA's Administrative Correspondence includes, though is not limited to, confidential management information, employee-related information, and project-related correspondence.

To ensure Administrative Correspondence is retained in an accessible format, a copy should be sent to gbota@gbota.com.au or meeting@gbota.com.au. Users should copy (cc) to this address when receiving or sending such email. Retention of such material will be administered by the IT officer.

3. Fiscal Correspondence

NSW GBOTA's Fiscal Correspondence includes all information related to revenue and expense for the organisation. To ensure Fiscal Correspondence is retained, in mailbox accounts@gbota.com.au. Users should copy (cc) to this address when receiving or sending such email. Retention of such material will be administered by the IT officer.

4. General Correspondence

NSW GBOTA's General Correspondence covers information that relates to customer interaction and the operational decisions of the organisation. The individual employee is responsible for email retention of General Correspondence where this is likely to be of continuing usefulness. General correspondence may include such things as Instant Messenger Correspondence, which may be saved with the logging function of Instant Messenger, or copied into a file and saved. Instant Messenger conversations that are Administrative or Fiscal in nature should be copied into an email message and sent to the appropriate email retention address.

5. Passing Correspondence

NSW GBOTA's Ephemeral Correspondence is by far the largest category and includes personal emails, emails dealing with the work of the day, and emails containing information outdated by events. Staff may destroy this after reading and acting on the material.

LEGAL REQUIREMENTS

1. Australian Charities and Not-for-profits Commission Act 2012 No. 168, 2012

Section 55-5 requires a registered entity to keep for 7 years written records that correctly records its operations, so as to enable any recognised assessment activity to be carried out. Under section 55-10 a recognised assessment activity includes an activity carried out to assess compliance with the Australian Charities and Not for Profit Commission Act and Regulations under that Act.

Citing just two examples of obligations under the Australian Charities and Not for

Profit Commission Regulations 2013:

- a registered entity must take reasonable steps to ensure its board members disclose any perceived or actual material conflicts of interest of any board members. If a board member was to send an email to the rest of the board disclosing a conflict of interest then this would need to be retained;
- a registered entity must take reasonable steps to ensure its board members do not allow the entity to operate while insolvent. Any email discussion between board members regarding the solvency of the entity (i.e. its ability to pay its debts as and when they fall due) would need to be retained.

2. Destruction of evidence

Various state and territory laws criminalise the destruction or concealment of a document that is likely to be required in evidence in a legal proceeding.

In New South Wales under the Crimes Act 1900 (NSW) s 317, it is an offence to suppress, conceal or destroy anything knowing that it is or may be required as evidence in any judicial proceeding, with the intent to mislead any judicial tribunal in any judicial proceeding.

3. Correspondence involving intellectual property

Any correspondence that involves the creation of any significant intellectual property rights shall be retained at the discretion of the General Manager. To ensure Administrative Correspondence is retained in an accessible format, it should be sent to gbota@gbota.com.au. Users should copy (cc) to this address when receiving or sending such email. Retention of such material will be administered by the IT officer.

4. Correspondence relating to litigation (or anticipated legal proceedings)

When legal proceedings are in process (or reasonably to be anticipated), particular considerations apply to document retention. This would include correspondence relating to any threatened or likely legal action against NSW GBOTA, relating to any alleged or likely misconduct by NSW GBOTA, its staff or volunteers. It is the responsibility of the General Manager to inform staff should these considerations be applicable and to circulate to staff any relevant changes in policy and procedures.

5. Privacy Act 1988 (Cth)

Under the Australian Privacy Principles implemented in accordance with the Privacy Act 1988 (Cth), an APP entity (i.e. an entity that is obliged to comply with the Australian Privacy Principles) must take such steps as are reasonable in the circumstances to destroy personal information, or to ensure that the information is de-identified, if the entity no longer needs the information for any purpose for which the information may be used or disclosed by the entity. The Privacy Act only applies to information about an individual (i.e. a human) it does not apply to information about entities. Furthermore, in determining whether the entity has any continuing need for the information is based upon uses that are permitted under the Privacy Act, not all possible uses to which the entity may want to put the information. However, this obligation is expressly subject to any obligation at law to retain the information so that an obligation to retain overrides this obligation to destroy.

6. Storage

It shall be the responsibility of the General Manager or their nominee to maintain backup discs or cloud back-up, and archiving from the NSW GBOTA email server. The email server should be backed up at least daily.

Where physical back-up media is used (rather than cloud storage) then at least once a quarter a set of discs shall be taken out of the rotation and be moved offsite. Email shall not be removed from the offsite backup discs.

Create, store or exchange information in violation of copyright laws (including the uploading or downloading of commercial software, games, music or movies);

- Undertake internet-enabled activities such as gambling, gaming, conducting a business or conducting illegal activities;
- Create or exchange advertisements, solicitations, chain letters or other unsolicited or bulk email.

UNACCEPTABLE USE

Organisation Officials may not use NSW GBOTA's computers to play games, undertake illegal activity or review prohibited material such as pornography at any time.

Further electronic devices including the use of internet isn't acceptable within the kennels and track areas without consent from the on-course Steward prior to use.

REVIEW

The Communications Policy will be reviewed annually and is the responsibility of the General Manager to ensure that:

- staff are aware of this policy;
- any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of all employees and volunteers to ensure that their use of electronic media conforms to this policy.