

MUSWELLBROOK WORKERS CLUB

SOCIAL MEDIA POLICY

Policy owner: Chief Executive Officer / General Manager

Approved by: Board of Directors

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Review date:

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1. Purpose

Muswellbrook Workers Club is committed to maintaining a safe, respectful and professional environment for its members, guests, directors, employees, contractors, volunteers and the broader community.

Social media provides valuable opportunities for communication, promotion, engagement and community participation. However, inappropriate social media activity can cause serious harm to individuals and to the Club's reputation, operations, relationships and legal interests.

The objectives of this Policy are to:

1. protect the reputation, goodwill, commercial interests and integrity of Muswellbrook Workers Club;
2. promote respectful, lawful and responsible online conduct;
3. explain the standards expected of Club members and employees when using social media;
4. protect members, employees, directors, contractors, volunteers, guests and other persons from bullying, harassment, discrimination, intimidation, threats, defamation and other harmful conduct;
5. protect the Club's confidential information, personal information, intellectual property and security;
6. clarify who may speak publicly or publish material on behalf of the Club;
7. establish a fair process for reporting, assessing and responding to potential breaches;
8. support compliance with the Club's Constitution, employment obligations and applicable laws; and
9. ensure that social media monitoring, including the use of artificial intelligence tools, is conducted responsibly, proportionately and subject to human review.

This Policy is intended to protect legitimate criticism, good-faith complaints and lawful participation in public debate while addressing conduct that is abusive, dishonest, threatening, confidential, discriminatory, defamatory or otherwise seriously damaging to the Club or its people.

2. Application to all categories of membership

This Policy applies to:

- all financial, life, social, temporary and other categories of Club members;
- applicants for membership, where relevant to the Club's consideration of their application;
- directors and officers of the Club;
- all permanent, part-time, casual and fixed-term employees;
- labour-hire workers, contractors, consultants, volunteers and work-experience participants;
- persons authorised to operate or contribute to an official Club social media account; and
- any other person representing or reasonably appearing to represent the Club.

The member provisions of this Policy apply in conjunction with the Club's Constitution and any applicable by-laws, codes of conduct or disciplinary procedures.

The employee provisions form part of the Club's lawful and reasonable workplace policies. Employees must comply with this Policy as a condition of their employment.

This Policy applies whether social media activity occurs:

- during or outside working hours;
- at or away from Club premises;
- using Club equipment, systems or accounts;
- using a personal device, account, profile or internet connection;
- under a person's real name, a nickname, an alias, a pseudonym or an anonymous account;
- in a public, private, closed, encrypted, temporary or disappearing-message environment; or
- directly or through another person.

Private or restricted communications may still be covered where they have a sufficient connection with the Club, a person's membership or employment, or the interests and reputation of the Club.

3. Relationship with the Club Constitution and s.140 of the Corporations Act 2001

Members are bound by the Club's Constitution.

Section 140 of the *Corporations Act 2001 (Cth)* provides that a company's constitution and applicable replaceable rules have effect as a contract between the company and each member, and between members in their capacity as members.

This Policy must be interpreted and applied consistently with the Club's Constitution. It does not replace, amend or limit the Constitution.

Where there is an inconsistency between this Policy and the Constitution, the Constitution will prevail to the extent of the inconsistency.

A breach of this Policy by a member may constitute misconduct, conduct unbecoming of a member, conduct prejudicial to the interests of the Club or another disciplinary offence under the Constitution, depending on the circumstances and the wording of the Constitution.

4. Definition and scope of social media

For this Policy, **social media** includes any online or digital platform through which users create, publish, share, transmit, review, comment on or exchange information, opinions, images, video, audio or other content.

This includes, without limitation:

- Facebook;
- X, formerly known as Twitter;
- LinkedIn;
- YouTube;
- Instagram;
- Snapchat;
- TikTok;
- review and rating sites;
- blogs and personal websites;
- Reddit and similar discussion platforms;
- online forums and message boards;
- online community and neighbourhood groups;
- gaming and streaming platforms;
- podcasts;
- messaging applications and group chats;
- workplace collaboration platforms;
- live-streaming services;
- petition, fundraising and campaign websites;
- comments on news websites;
- public or private online groups; and
- any current or future platform providing similar functionality.

Social media activity includes posting, commenting, replying, reacting, liking, sharing, reposting, forwarding, tagging, reviewing, rating, uploading, live-streaming, recording, editing or otherwise distributing content.

A like, reaction, repost or share may be treated as an endorsement where a reasonable person would understand it that way.

5. General principles

All persons covered by this Policy should:

- communicate respectfully;
- consider the accuracy and potential impact of material before publishing it;
- distinguish personal opinions from authorised Club communications;
- protect confidential and personal information;
- avoid conduct likely to harm another person or expose the Club to legal or reputational risk;
- use established internal processes to raise workplace, governance, safety, service or membership concerns where appropriate;
- comply with lawful directions, the Club's Constitution and applicable Club policies; and
- remember that online content can be copied, searched, archived, attributed and distributed even after deletion.

The Club will consider the full context of alleged conduct. It will not treat mere disagreement, reasonable criticism or a good-faith complaint as misconduct solely because it is uncomfortable, unfavourable or critical.

6. Expected conduct of members

Members are expected to uphold the standards of behaviour required by the Constitution when using social media.

Members must not use social media to:

1. bully, harass, abuse, intimidate, threaten or vilify another member, guest, employee, director, contractor, volunteer or other person associated with the Club;
2. make discriminatory, racist, sexist, homophobic, transphobic, ableist, ageist or otherwise unlawful or seriously offensive statements concerning the Club or its people;
3. publish knowingly false, misleading or malicious allegations about the Club, its management, directors, employees, members, suppliers or operations;
4. engage in defamatory conduct;
5. disclose confidential information concerning the Club or another person;
6. publish personal information, images, recordings or private communications without lawful authority or appropriate consent;
7. impersonate the Club, an official Club account, a director, employee, member or other person;
8. falsely claim to speak for or represent the Club;
9. use the Club's name, logo, branding, images or intellectual property in a misleading, unauthorised or damaging manner;
10. interfere with a Club investigation, disciplinary process, election, commercial relationship or legal proceeding;

11. encourage unlawful conduct, violence, damage, disruption or harassment;
12. make malicious complaints or organise coordinated online abuse, review bombing or harassment;
13. publish material that creates a serious risk to the safety, welfare or security of Club personnel, members or guests;
14. disclose information that may compromise the security of Club premises, systems, cash-handling procedures or employees;
15. post images, video or audio recorded in a restricted area or in circumstances where recording is prohibited;
16. identify or publish information about children or vulnerable persons inappropriately;
17. use Club Wi-Fi, devices or systems to engage in unlawful or prohibited conduct; or
18. procure, encourage or assist another person to do any of the above.

7. Public discussion concerning the Club, Board, management and employees

Members may participate in public discussions and may express honestly held opinions about the Club.

However, participating in a public social media discussion concerning Muswellbrook Workers Club, its Board, management, employees or operations in a negative or harmful manner that is contrary to the interests and reputation of the Club may, in the reasonable opinion of the Disciplinary Committee, constitute conduct unbecoming of a member.

In determining whether conduct is unbecoming of a member, the Disciplinary Committee may consider:

- whether the statement was true, substantially true or honestly believed on reasonable grounds;
- whether it was expressed in good faith;
- whether the member attempted to raise the matter through an appropriate Club process;
- the language, tone and seriousness of the publication;
- whether the publication included abuse, threats, harassment or personal attacks;
- whether confidential or personal information was disclosed;
- the size and nature of the audience;
- whether the content was repeatedly posted or distributed;
- whether the member identified themselves as a member or claimed to represent other members;
- the actual or potential harm to the Club or another person;
- whether the member corrected or removed inaccurate content;
- whether the content related to a genuine safety, legal, regulatory or public-interest concern;

- whether the member was exercising a lawful workplace right or making a protected disclosure; and
- any explanation, apology, corrective action or other relevant circumstance.

The fact that material is critical, embarrassing or unfavourable to the Club does not, by itself, establish misconduct.

8. Complaints and criticism by members

Members are encouraged to raise concerns directly with the Club so that they can be considered and addressed fairly.

Concerns may be raised through:

- the Club's feedback or complaints procedure;
- the Chief Executive Officer or General Manager;
- the Board, where appropriate;
- a designated complaints or member-relations contact;
- a regulator, law-enforcement agency or other body with lawful jurisdiction; or
- any protected disclosure or whistleblower channel available to the person.

Nothing in this Policy prevents a member from:

- making a genuine complaint;
- seeking legal advice;
- contacting a regulator or law-enforcement agency;
- giving truthful evidence;
- reporting suspected unlawful conduct;
- making a disclosure protected by law; or
- expressing an honestly held opinion in a lawful, reasonable and respectful manner.

Members must not knowingly make a false, vexatious or malicious complaint.

9. Member disciplinary process

Where the Club reasonably believes that a member may have breached this Policy or committed an offence under the Constitution, the matter may be referred to the Disciplinary Committee.

The member may be required to attend a disciplinary meeting to determine whether the member is guilty of the charge.

Subject to the Club's Constitution, the member should ordinarily be provided with:

- written notice of the alleged conduct;
- sufficient details to understand and respond to the allegation;
- reasonable notice of the disciplinary meeting;

- an opportunity to provide a written response;
- an opportunity to attend and be heard;
- an opportunity to present relevant evidence;
- any right to a support person or representative provided under the Constitution; and
- notice of the decision and any sanction imposed.

The Club may take reasonable interim action where necessary to protect safety, preserve evidence, maintain order or prevent further harm. Any interim action is not a finding of guilt.

The Disciplinary Committee will determine the matter in accordance with the Constitution, procedural fairness and the evidence available.

10. Member sanctions

Where a charge is established, the Disciplinary Committee may exercise any power available to it under the Club's Constitution.

This may include:

- issuing a reprimand;
- imposing a fine;
- suspending the person from membership of the Club;
- expelling the person from the Club;
- accepting the person's resignation from membership;
- restricting access to particular Club services or activities where authorised;
- directing the person to remove or correct specified content;
- requiring an apology or undertaking, where authorised and appropriate; or
- imposing any other sanction permitted by the Constitution.

A sanction will be determined having regard to:

- the seriousness of the conduct;
- whether it was deliberate or repeated;
- the harm or potential harm caused;
- the member's disciplinary history;
- whether the member cooperated with the investigation;
- whether material was removed, corrected or retracted;
- whether the member apologised or took steps to repair the harm;
- any mitigating circumstances; and
- the need for consistency and proportionality.

Where the Constitution provides a right of appeal or review, that right will apply.

11. Social media monitoring

The Club may actively monitor publicly available social media and other online content relating to:

- Muswellbrook Workers Club;
- the Club's trading names, brands, venues, services and events;
- members, employees, directors or contractors in connection with the Club;
- public complaints, reviews and reputational risks;
- safety or security threats;
- suspected misconduct;
- impersonation or misuse of Club intellectual property; and
- matters reasonably relevant to Club operations or legal obligations.

Monitoring may be undertaken manually or with the assistance of search, alerting, analytics, sentiment-analysis or artificial-intelligence tools.

The Club does not require members or employees to provide passwords to personal accounts unless permitted or required by law.

The Club will not represent that it has accessed private content merely because it has received a screenshot, report or copy from another person. The reliability and context of such material must be assessed.

12. Use of artificial intelligence

The Club may use artificial intelligence and automated tools to locate, organise, classify, summarise, translate or preliminarily assess publicly available comments and other relevant online material.

AI tools may assist with matters such as:

- identifying references to the Club;
- grouping similar comments;
- detecting potential threats, abuse or reputational issues;
- conducting preliminary sentiment or risk analysis;
- translating content;
- identifying possible policy issues; and
- prioritising material for human assessment.

AI-generated results may be incomplete, inaccurate, biased or misleading. Accordingly:

1. AI output will be treated as an indicator requiring further assessment, not as conclusive evidence;
2. no member or employee will be found guilty of misconduct solely because an AI tool classified content as negative or harmful;

3. a suitably authorised person will review relevant source material and context;
4. the person concerned will be given an opportunity to respond, where required by the Constitution, this Policy or law;
5. the Club will take reasonable steps to verify the identity of the author and the authenticity of material;
6. access to collected information will be restricted to persons with a legitimate need;
7. personal information will not be entered into public or unapproved AI services unless authorised and legally permitted;
8. sensitive, confidential or legally privileged information must not be uploaded to an AI platform without specific authorisation and appropriate safeguards; and
9. final disciplinary decisions will be made by authorised human decision-makers.

13. Privacy and information handling

The Club will handle personal information obtained through social media monitoring in accordance with its privacy obligations and applicable law.

Where applicable, the Club will take reasonable steps to:

- collect only information reasonably necessary for a legitimate Club function or activity;
- use lawful and proportionate monitoring methods;
- notify affected persons of relevant monitoring practices through this Policy or other notices;
- limit use and disclosure of information to the purpose for which it was collected or another permitted purpose;
- ensure information relied upon is reasonably accurate, complete and current;
- protect information from misuse, interference, loss and unauthorised access;
- restrict access to authorised personnel and advisers;
- retain information only for as long as reasonably necessary or legally required;
- securely destroy or de-identify information when no longer required; and
- respond appropriately to requests for access or correction where a legal right applies.

Public availability does not mean that information may be collected, used or disclosed without regard to privacy, fairness or other applicable legal obligations.

Any workplace surveillance involving employees, Club systems or devices will be conducted in accordance with applicable surveillance laws, required notices and Club policies.

14. No expectation that online activity is private

Members and employees should understand that social media content may become available to the Club even where:

- an account uses privacy settings;

- a post is made in a closed group;
- a message is described as private or confidential;
- content is intended to disappear;
- an alias or anonymous account is used;
- the author later deletes the material; or
- another user captures or forwards the content.

The Club will not assume that content is reliable merely because it has been provided to the Club. Context, authenticity and lawful access will be considered.

15. Record keeping

The Club may retain records relevant to a complaint, investigation, disciplinary process, legal obligation or operational risk.

Records may include:

- links and URLs;
- screenshots;
- dates and times;
- account and profile information;
- public comments and responses;
- relevant correspondence;
- investigation notes;
- AI-generated summaries or classifications;
- human-review notes;
- findings and outcomes; and
- any corrective or disciplinary action.

Records will be managed in accordance with the Club's record-management and privacy requirements.

16. Reporting a concern

A member, employee or other person who becomes aware of a possible breach should report it to:

Position: Membership Manager

Email: foyer@muswellbrookworkers.com.au

Telephone: 0296543 2011

Postal address: 15-17 Sydney Street, Muswellbrook NSW 2333

Urgent safety threats should be reported immediately to Club management and, where appropriate, police or emergency services.

A report should, where possible, include:

- the platform involved;
- the account name;
- a link or screenshot;
- the date and time;
- a description of the concern;
- the people affected;
- any relevant background; and
- whether immediate action is required.

Reports should be made honestly and in good faith.

17. Preservation of evidence

A person reporting concerning content should avoid repeatedly forwarding or republishing harmful material.

Where safe and lawful, the person should preserve:

- the original link;
- screenshots showing the full context;
- the account or profile name;
- the date and time;
- relevant comments before and after the content; and
- information indicating whether the content was edited or removed.

A person must not alter, fabricate or misleadingly crop evidence.

18. Confidentiality

The Club will manage reports and investigations as confidentially as reasonably practicable.

Information may be disclosed where necessary to:

- investigate or determine a matter;
- provide procedural fairness;
- protect safety;
- obtain professional advice;
- comply with the Constitution or law;
- report suspected unlawful conduct; or
- implement an outcome.

A person involved in an investigation must not improperly publish or discuss confidential investigation material.

19. Victimisation and retaliation

A person must not victimise, threaten, disadvantage or retaliate against another person because they:

- made a genuine report;
- participated in an investigation;
- provided evidence;
- exercised a workplace right;
- raised a safety concern; or
- made a disclosure protected by law.

Retaliation may constitute a separate and serious breach of this Policy.

This protection does not apply to a person who knowingly makes a false, malicious or fabricated allegation.

20. Immediate action and removal requests

Where content presents an immediate safety, legal, security or serious reputational risk, the Club may take reasonable interim steps, including:

- requesting removal or correction of content;
- reporting content to a platform;
- preserving evidence;
- restricting access to Club accounts, premises or systems where authorised;
- notifying an insurer, adviser, regulator or police;
- seeking an injunction or other legal remedy; or
- issuing an interim communication to protect people or correct material misinformation.

An interim step does not constitute a final finding that a breach occurred.

21. False attribution, hacked accounts and impersonation

A person who believes that:

- their account has been hacked;
- content has been falsely attributed to them;
- an account impersonates them;
- a screenshot has been fabricated or altered; or
- AI-generated content has falsely depicted or represented them,

should notify the Club promptly and provide any available supporting information.

The Club will consider such claims before reaching a final conclusion.

22. Education and awareness

The Club may provide education to employees and authorised social media users concerning:

- this Policy;
- respectful online conduct;
- privacy and confidentiality;
- cybersecurity;
- identifying misinformation and manipulated content;
- responsible use of AI;
- managing online complaints;
- records and evidence; and
- escalation of safety or reputational issues.

Managers are responsible for promoting compliance and escalating potential breaches appropriately.

23. Other policies and laws

This Policy should be read with the Club's:

- Constitution;
- Code of Conduct;
- Member Disciplinary Policy;
- bullying, harassment and discrimination policy;
- privacy policy;
- whistleblower policy;
- information-security and acceptable-use policies;
- media and communications policy;
- work health and safety policy;
- responsible-service and gaming policies;
- confidentiality requirements; and

Conduct may breach more than one policy or legal obligation.

Nothing in this Policy limits any right, duty, remedy or power arising under the Constitution, an employment contract, legislation or common law.

24. Interpretation

For this Policy:

Club means Muswellbrook Workers Club and any related business, venue or trading name to which the Policy is adopted.

Confidential information includes non-public commercial, financial, operational, security, legal, employment, member and personal information.

Disciplinary Committee means the committee, body or persons authorised under the Club's Constitution to hear and determine disciplinary matters.

Member means a person admitted to membership under the Club's Constitution.

Public social media discussion includes a post, comment, review, video, recording or other communication that is publicly accessible or is distributed to a group or audience beyond a genuinely private one-to-one exchange.

Serious misconduct has the meaning given by applicable employment law and includes conduct sufficiently serious to justify summary dismissal in the circumstances.

25. Policy administration

The Club may amend this Policy from time to time, subject to the Constitution, applicable consultation obligations and law.

The Club will communicate material changes to members and employees through reasonable means, which may include:

- publication on the Club's website;
- display on Club premises;
- member communications;
- employee induction or training;
- email or staff communications; or
- the Club's policy system.

Questions about this Policy should be directed to the Chief Executive Officer.

MEMBER NOTICE

Members are reminded that membership of Muswellbrook Workers Club is subject to the Club's Constitution.

Social media conduct concerning the Club, its Board, management, employees, members or operations may be referred to the Disciplinary Committee where the conduct may constitute conduct unbecoming of a member or another offence under the Constitution.

A member found guilty of a disciplinary charge may be subject to any sanction authorised by the Constitution, which may include reprimand, fine, suspension, expulsion or acceptance of resignation from membership.

Members are encouraged to raise complaints through the Club's established complaint process so that concerns can be assessed and addressed fairly.