



Social Media Procedure

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1. PURPOSE

- 1.1. The primary purpose of this procedure is to ensure that Advanced Aviation Training (the Company) has a consistent approach to the management of social media. Adherence to this procedure will provide a clear view of what the company considers appropriate use of social media platforms.
- 1.2. This procedure applies to all workers either directly engaged by the Company or engaged by entities owned or managed by the Company.

2. RESPONSIBILITIES

- 2.1 **Contractor.** A contractor is not an employee but has the same obligations as it relates to following Company policies and procedures, delivering assigned accountabilities within the scope of their engagement, behaving in a reasonable and appropriate manner and observing all Workplace, Health and Safety (WHS) obligations in the workplace. Specifically, contractors will understand this procedure and ensure that they comply with the same employee rules associated with any communication they may make on social media.
- 2.2 **Employee.** An employee has a responsibility to:
 - Protect the Company's integrity and commercial interests;
 - Ensure that social media use does not bring the Company into disrepute;
 - Not make statements on behalf of the Company or imply the company's endorsement of your personal views without written authorisation by the Company;
 - Protect confidential information;
 - Communicate in a professional and courteous manner; and
 - Make sure that the use of social media does not detract from the user's effectiveness at work.
- 2.3 **Manager/Supervisor.** In addition to observing the worker accountabilities, Manager/Supervisors are responsible for the implementation and oversight of this procedure specific to their location or workgroup.

3. DEFINITIONS

- 3.1 **Company.** For the purposes of this procedure the Company is Advanced Aviation Training. Unless specified otherwise in this document the Company includes any Group Company, which is any associated entities or related bodies corporate (as that term is defined in the Corporations

Act 2001 (Cth)) to the Company or any entity in which the Company or any related body corporate of the Company has an ownership interest.

- 3.2 **Contractor.** Any individual engaged by the company to complete a specific task on a 'fee for service' arrangement. Engagement will relate to a specific scope of work to be completed in a defined period.
- 3.3 **Employee.** Any person who has a signed contract of employment with the Company. This includes full-time, part-time and casual employees.
- 3.4 **Final Decision Maker.** The person who may also be a director of the Company that has the delegated authority to make final decisions related to the administrative management of workers. The Final Decision Maker for the Company is the Chief Executive Officer.
- 3.5 **Alternate Delegated Decision Maker.** The person who may also be a director of the Company authorised to make decisions on behalf of the Final Decision Maker in their absence. The Alternate Delegated Decision Maker for the Company is the Chief Executive Officer.
- 3.6 **Worker.** A person who carries out work in any capacity directly for the Company. A worker may include (but not limited to) directors, employees and contractors engaged by the Company.
- 3.7 **Social Media** - means any conversation or activity that occurs online, where people or brands can share information or data with their social network. Examples of social media covered by this policy include, but are not limited to:
- Social networking sites (e.g. Facebook, LinkedIn, Snapchat)
 - Micro-blogging sites (e.g. Twitter, Tumblr)
 - Corporate, media, personal and other blogs
 - Online discussion boards and forums (e.g. Whirlpool)
 - Video sharing sites (e.g. YouTube, Flickr)
 - Online editable encyclopaedias (e.g. Wikipedia)
- 3.8 **Workplace.** A place where work is carried out for a business or undertaking and includes any place where an employee or contractor goes, or is likely to be, while at work. Workplaces include but are not limited to; fixed facilities, temporary sites, installations, vehicles or other mobile structures.

4. REFERENCES

- 4.1 Terms and Conditions of Employment Policy
- 4.2 Poor Performance and Discipline Procedure

5. PROCEDURE

5.1. **Principles.** In order for this procedure to be used effectively, the following principles have been developed for workers when interacting on social media platforms:

- **Know the legal implications.** Laws that apply to traditional media forms (such as privacy, defamation, copyright, harassment, discrimination and contempt) also apply to social media. Although social media interactions may be virtually instant and appear less formal than traditional media forms, the same legal implications may result. If a worker breaks the law, by communicating on a social media platform in an inappropriate or detrimental manner they may be personally liable.
- **Disclosure.** When engaged in social media interaction on a Company branded or personal social media platform for role-related purposes, it is important that there is appropriate disclosure in order that the audience understands that a worker's commentary on these platforms is in their capacity as a worker of the Company. Given that some social media platforms have restricted limits to the characters that can be published, the preferred method for disclosing an association with the Company is for the worker to update their profile to reflect what professional affiliation they have with the Company. Importantly, no worker engaged by the Company is to interact on social media for work-related purposes unless they have been approved to do so by the relevant Manager/Supervisor.
- **Communicate Appropriately.** Whenever an worker is communicating on a Company branded social media platform or personal social media platform (on behalf of the Company), they shall ensure that they communicate in a professional and courteous manner so as not to bring the reputation of the Company into disrepute. In addition, communications must not harass, bully, discriminate or victimise workers, clients or suppliers of the Company. This requirement also extends to any communication on a personal social media platform where personal comments (not related to any role-based requirements) are directed toward, in reference or connection to the Company, its workers, clients or suppliers.
- **Protect Confidentiality.** Workers are not to divulge, use or comment on any part of the Company's confidential information. This includes (but is not limited to) financial information, business strategy, sales results, clients information, contract information, trade information or staff changes. Workers shall also be aware that making social media connections (such as "friending" or "following") with workers, clients and suppliers may disclose confidential working relationships, breach rights to anonymity or have a similar effect. Such factors should therefore be considered prior to making a social media connections. Confidentiality obligations continue even if an worker's engagement with the Company ends.

- **Protect Company Brand.** When communicating on social media platforms, workers shall clearly distinguish fact from opinion and conduct social media activity with common sense, integrity and accuracy. As such, a worker needs to consider the appropriateness of the communication they are making and whether their communication (either in a role-based capacity or personal capacity) may be detrimental to the brand and reputation of the Company. Workers should ask themselves what a reasonable and rational person (in the same circumstances) would communicate so as to avoid posting anything that is likely to bring the Company, its businesses, brands, workers, clients and suppliers into disrepute.
- **Use appropriately.** Workers are to ensure that any personal use of social media does not detract from their effectiveness at work and their ability to effectively discharge their employment accountabilities. Workers are to avoid being distracted by social media during normal business hours unless such social media use is a function of their role. Additionally, workers are not to use the Company social media accounts for their own use or personal gain (such as driving traffic to a personal social media site).

5.2. **Risk Management.** The responsibilities and principles contained in this procedure outline how to appropriately interact on social media platforms. Failure to interact on these platforms appropriately may place the company and workers (personally) at risk of infringing laws and internal Company policy and procedure that deals with matters such as, but not limited to, privacy, defamation, copyright, harassment, bullying, discrimination and contempt. As such, it is important that when workers are interacting on social media for work-related purposes or making comment on their personal social media account(s) on Company-related matters that they ensure that the information that is published is written, edited and handled in a manner consistent with the requirements of this procedure.

5.3. This procedure does not restrict a workers personal use of social media but does become relevant if personal use during work hours impacts effectiveness and productivity or the material that is published during personal use is in any way connected to a workers' role at the Company and/or Company related matters, which also extends to any Company worker, client or supplier.

5.4. It is also important to understand the level of risk associated with communicating on social media and to manage it appropriately. Regardless of a workers' role in the Company, there is an underlying risk as social media platforms allow information to be instantly projected into the public domain. Furthermore, when utilising a personal social media account for work-related purposes or in response to Company-related matters, the same levels of checks and balances that would normally occur for more traditional forms of communication both internal and external to the Company do not exist. As a consequence, workers in these situations need to exercise a high degree of discretion regarding what they publish or communicate and if in doubt should always refer to their Manager/Supervisor for advice.

5.5. Some examples have been provided (below) of activities which may breach the social media principles and other Company policies and procedures:

- A manager revealing confidential information about upcoming redundancies of staff members on their Facebook account;
- A worker publishing inappropriate comments or views on an activity that has recently been conducted by the Company;
- A worker, from any work area, using a social media account to bully, vilify or harass another worker;
- A worker found to be regularly posting non work-related content on their personal social media account during normal working hours; and
- A manager revealing confidential matters discussed at a management meeting.

5.6. In order to manage the risk associated with the use of social media, it is important that workers and their audience know the difference between the worker's professional and personal commentary on social media platforms. The Company encourages workers at all times to stop and think before publishing or communicating any information on social media platforms to ensure that any posts/comments are in keeping with the Company's social media principles.

5.7. **Managing inappropriate content on social media.** The aim of social media is to promote conversation and engage audiences, however be aware that some people purposely use these platforms to post offensive, provocative or defamatory material.

5.8. If a worker views comments on a Company branded social media account or personal account that could bring the reputation of the Company and its related businesses into disrepute or may harass, bully, discriminate or victimise workers, clients or suppliers of the Company, they shall let the relevant Manager/Supervisor or social media administrator know as soon as possible so the content can be removed. As a guide, content should be removed that is:

- abusive, offensive in nature or contains offensive language;
- bullying, harassing, defaming or giving offence to other people;
- contains personal and/or cultural attacks or insults;
- potentially libellous or defamatory;
- off-topic or spam;
- plagiarised material;
- commercial content;
- unauthorised copyright material; and
- detrimental to the Company in any way.

- 5.9. Similarly, if a worker feels that someone is targeting their personal social media account about matters that may be connected to their employment or otherwise with the Company, they are encouraged to speak with their Manager/Supervisor in the first instance in order that it may be managed (as appropriate).
- 5.10. There may also be formal and informal chat groups used for communication within the organisation. Regardless of whether these groups are endorsed (or otherwise) by the Company, exercise discretion on how you communicate in these environments.
- 5.11. **Compliance and enforcement of this procedure.** Non-compliance with the Company's Social Media Procedure and other relevant policies and procedures will be considered by the Company to be a serious matter as it may have serious consequences for the Company from a reputational or commercial perspective. Matters will be investigated and managed through a formal disciplinary process and depending on the nature of any non-compliance, formal administrative action may be taken which could include formal warnings or termination of employment or engagement.

6. RECORDS

- 6.1. All documentation relating to matters covered in the Social Media Procedure must be retained on the workers personnel files at their location of work.

7. REVIEW

- 7.1. Annual