

Public Comment Policy

Policy number: LAP02

Date policy was made

11 April 2016

Commencement date of this version

11 April 2016

Application

This Policy applies to all Industry Participants (including GRNSW staff members).

This Policy does not apply to Public Comments, including personal use of Social Media, that makes no express or implied reference to Greyhound Racing, GRNSW or Greyhound Racing Clubs and Officials.

Purpose

The purpose of this policy is to set out GRNSW's expectations of Industry Participants who make any Public Comment, on Social Media and otherwise, in relation to Greyhound Racing including comment that may adversely affect GRNSW, Greyhound Racing Clubs and Officials and the reputation and integrity of Greyhound Racing.

GRNSW recognises the value of Public Comment by Industry Participants, including on Social Media, to promote Greyhound Racing and as an important tool of engagement for Industry Participants. This Policy does not intend to discourage, nor unduly limit, personal expression or online activities. However, given the nature of the industry, each Industry Participant can be seen as an ambassador for Greyhound Racing and therefore any Public Comment they make may impact the industry as a whole. Therefore, Public Comments should be made with care and respect. In addition, Industry Participants should be aware of provisions in the Rules which may be contravened when making Public Comment, including the offences contained in national rules 86(f) and 86(q) and local rules 86(b) and 86(c). GRNSW treats comments in Social Media in the same manner as comments made in person and in the traditional media.

GRNSW encourages Industry Participants and members of the public to raise legitimate animal welfare concerns. Information about live baiting, integrity, animal welfare, animal cruelty or the conduct of a person involved in greyhound racing can be submitted by calling the NSW Greyhound Welfare and Integrity Hotline on 1800 680 174.

This Policy applies equally to unofficial Public Comment made by GRNSW staff members in their private capacity.

The purpose of those rules is to protect the reputation and welfare of Greyhound Racing, GRNSW and Greyhound Racing Clubs and Officials from the effects of inappropriate Public Comment. Inappropriate Public Comment can be severely detrimental to the integrity, viability and cohesive operation of Greyhound Racing and the respect for Greyhound Racing Officials and personal safety.

Policy statement

What is Public Comment?

Public Comment is any comment that is made (whether by publication, broadcast or otherwise) by a person or caused to be made by a person:

- a) to the community at large; or
- b) where it might reasonably be expected that the publication or circulation of the comment will spread to the community at large.

Without limitation this includes:

- Comment whether by words, images or other content;
- Comment in traditional media including newspapers, television and radio;
- All comment on Social Media. Such comment should not be regarded as private communication between individuals given the risk of the content being spread to others including the community at large.

Official public liaison and Social Media engagement by GRNSW

Official Public Comments of GRNSW, including on Social Media, may only be made by GRNSW in accordance with its internal policies, including the GRNSW Staff Code of Conduct.

For the avoidance of doubt, GRNSW staff members are permitted to make unofficial Public Comment in their private capacity provided that:

- a) They make these comments as a private citizen, without using GRNSW's name, address (physical or virtual) or other indicia that may be associated with GRNSW; and
- b) They otherwise abide by this Policy and their other obligations to GRNSW.

Non-official Public Comment including Social Media engagement by Industry Participants

Industry Participants should recognise that inappropriate Public Comment may damage the reputation and welfare of Greyhound Racing, GRNSW and other Industry Participants. Industry Participants are personally responsible to the content of the Public Comments and should ensure any comment made about or in relation to Greyhound Racing is informed and factually accurate.

In this respect, and in accordance with rule 86 of the Rules, Industry Participants should not make any Public Comment that:

- a) is unreasonably detrimental or prejudicial to the interest, welfare, image, control or promotion of Greyhound Racing; or
- b) unreasonably uses any contemptuous, improper, insulting or offensive language, imagery or other content towards or in relation to a Greyhound Racing Official exercising their powers, or performing their duties or functions in relation to greyhound racing.

Without limiting the generality of these provisions, GRNSW would consider Public Comment that makes any express or implied reference to Greyhound Racing, GRNSW and / or any Greyhound Racing Club and Official and includes any of the following content to be unreasonable:

- a) defamatory material towards or in relation to a Greyhound Racing Official;
- b) statement or opinion not based on truth and / or made without reasonable foundation including in relation to a Greyhound Racing Official and / or the integrity of Greyhound Racing or its management, Greyhounds Australasia or its officials;
- c) discriminatory, racist, abusive, threatening or obscene language or imagery;
- d) language or imagery that is otherwise offensive or inflammatory without a reasonable basis;
- e) misrepresentations about the source of comments or the identity of the maker;
- f) breaches the reasonable expectation of privacy of a person;
- g) comment that may constitute a criminal offence or give rise to civil liability or that otherwise breaches any law; and / or
- h) comment identifying matters that are currently the subject of legal proceedings, stewards inquiries or appeals that would prejudice a proceedings or breach a court's non-publication order.

If an Industry Participant is unsure whether a Public Comment they propose to make will be in breach of this policy, they should contact GRNSW for its approval prior to making the Public Comment.

Complaints and investigation

GRNSW will continually monitor media and online Social Media activity in relation to Greyhound Racing.

If an Industry Participant considers that there has been Public Comment in contravention of this Policy they may make a complaint about the comment or content to GRNSW. GRNSW may order an inquiry into the comment in accordance with Rule 90 of the Rules. If an Industry Participant is reasonably believed to have breached this Policy, the matter may constitute an offence under the rules and subject to further inquiry in accordance with the Rules.

Consultation or advice

This policy has been developed to provide guidance for Industry Participants (including GRNSW staff members) in relation to Public Comment including in the emerging area of online social interaction. Industry Participants who are unsure of their rights, liabilities or actions pertaining to this policy, should contact GRNSW.

Consequences of a breach of this policy

An Industry Participant who has made Public Comment which is in breach of this Policy, or suspected to breach this Policy, may be requested to:

- remove or withdraw the Public Comment; and / or
- make corrective Public Comment.

A breach of this Policy may result in disciplinary action under the Rules. A breach of this Policy may also amount to breaches of other GRNSW governing documents, including the *Greyhound Racing New South Wales Discrimination, Harassment and Bullying Policy*.

If a GRNSW staff member breaches this Policy, they may be subject to disciplinary action, up to and including termination of employment.

Definitions

In this policy:

Act means the relevant legislation pertaining to a jurisdiction relating to greyhound racing, including the *Greyhound Racing Act 2009* (NSW).

Greyhound Racing means everything and anyone who participates, at any level, at any time, with any activity associated with greyhounds or racing and includes, but is not limited to:

- a) the keeping of greyhounds which are in the care or custody of registered or other persons;
- b) the registration and breeding of greyhounds;
- c) any matter or thing connected with greyhound racing.

Greyhound Racing Club and Official means:

- a) a Steward;
- b) the Committee, or a member of the Committee, of a club;
- c) GRNSW or a staff member of GRNSW; or
- d) any other person having official duties in relation to Greyhound Racing,

as these terms are defined in the Rules.

GRNSW means *Greyhound Racing New South Wales* as a body corporate, constituted by section 4 of the Act.

Industry Participant means:

- (a) all persons bound by the Rules pursuant to rule 3, in relation to Greyhound Racing conducted or administered by GRNSW. This includes GRNSW staff members, members and officers of clubs and persons who take part or attend in events; and
- (b) GRNSW staff members.

Policy means this *Greyhound Racing New South Wales Public Comment Policy*.

Public Comment has the meaning given to it in part 4 of this Policy.

Rules mean the GRNSW *Greyhound Racing Rules*, as amended from time-to-time.

Social Media means websites and applications that enable users to create and share content or to participate in social networking including, but not limited to, social networking sites (such as LinkedIn, Facebook) content sharing sites (such as YouTube); blogs (such as Twitter, Comments); and forums and discussion boards (such as Google Groups).

Relevant legislation and rules

Greyhound Racing Act 2009 (NSW)

GRNSW Greyhound Racing Rules: Rule 86 sets out offences under the Rules.

Key related documents

GRNSW Employee Code of Conduct

GRNSW Anti-Discrimination, Harassment and Bullying Policy

Amendments to, and operation of, this policy

GRNSW reserves the right to amend this policy at any time. This policy does not operate contractually and is not intended to be contractual in nature.

Policy information

Effective dates

Date policy was made: 11 April 2016

Commencement date of this version: 11 April 2016

Policy details

Policy number: LAP02

Date for review: As required

Policy owner: General Counsel

Revision history

Version	Date	Description
1.01	11 April 2016	CEO Approval