



# Elements of a Social Media Policy

**C**hapter 5 outlined the basic principles of social media policy and recommended procedures for preparing your own document. Here we offer specific topics that your policy should address and recommend language to use. There is a large database of downloadable policies at [SocialMediaGovernance.com](http://SocialMediaGovernance.com). We recommend looking up documents created by other companies similar to yours and using them as a guide.

## Policy Statement

Begin with an official policy statement. This is the place to manage your company's reputation. You may want to involve the marketing or public relations department in drafting this language. If the policy is going to be publicly available, this is the section that will get read most.

Here are some of points you'll want to consider for this section:

1. Your company recognizes that its employees have the right to use social media if they choose.

2. Your company understands and appreciates that social media is fundamentally changing the way people communicate.
3. The same principles that apply to the activities of employees in your company's existing policies apply to social media as well.
4. Your company respects the legal rights of its employees.
5. This policy applies to activities both at work and outside of work if those activities affect job performance or any business interests.

## Objectives

Before you circulate a draft for review, make sure you have consensus on the objective of the policy. Negotiating edits among your stakeholders is pointless unless everyone is working toward the same goals. If your goal is to empower employees to leverage social media and the information technology (IT) department's goal is to limit access (if it is, you've got some educating to do), these conflicts need to be ironed out first. Draft the policy to reinforce, not reform, the organization's existing personality.

Your objectives should look something like this:

1. Establish practical, reasonable, and enforceable guidelines by which <ORGANIZATION NAME> employees can conduct responsible, constructive social media engagement in both official and unofficial capacities.
2. Prepare <ORGANIZATION NAME> and its employees to utilize social media channels to help each other and the communities <ORGANIZATION NAME> serves, particularly in the event of a crisis, disaster, or emergency.
3. Protect <ORGANIZATION NAME> and its employees from violating municipal, state, or federal rules, regulations, or laws through social media channels.

If you live in the United States, you don't have the right to deny employees' right to free speech. But you can impose certain restrictions to protect your organization's reputation if employees' social media

disclosures occur in a public forum. You cannot restrict employees from participating in a secure online social network, no matter how distasteful the purpose of that network may be.

## Guiding Principles

Before diving into situational guidance, establish the overarching principles on which your organization's social media policy is founded.

For example, if your organization “trusts and expects employees to exercise personal responsibility whenever they use social media, which includes not violating the trust of those with whom they are engaged,”<sup>1</sup> then say so. If you believe that employees should “never use social media for covert advocacy, marketing, or public relations,” and that they should “clearly identify themselves as employees when communicating on behalf of the organization,” give them boilerplate disclaimers to include with any social media disclosures for which they have a potential conflict of interest or that could adversely affect your corporate reputation. For example:

1. “I work for <ORGANIZATION NAME>, and this is my personal opinion.”<sup>2</sup>
2. “I am not an official <ORGANIZATION NAME> spokesperson but my personal opinion is . . .”
3. “The postings on this site are my own and don't necessarily represent <ORGANIZATION NAME>'s positions, strategies, or opinions.”<sup>3</sup>

Disclaimers belong on employee profile pages. A disclaimer inside a blog post or status update is insufficient. It also may be a good idea to include a second disclaimer in specific updates or comments if they could be easily misunderstood as official company statements.

Social media disclosures shouldn't be required for information that doesn't mention the company or relate to the company's business.

More guiding principles to consider:

1. Only designated spokespeople can make public disclosures on behalf of the company in an official capacity, but all

employees may use social media to make public disclosures for themselves individually.

2. All employees may use their personal social media accounts to refute false or misleading information online, but only if they comply with the terms of the policy. [The idea here is that all employees are encouraged to carry the company message into their online interactions, so long as they include the standard disclaimer, so their disclosures are not seen as representative of the official company line.]
3. While the company respects the rights of employees to use social media, it is every employee's responsibility to ensure it does not interfere with his or her ability to get the job done.

You may also wish to consider extending the policy to your company's contractors, vendors, and agencies.

In September 2009, Fleishman-Hillard senior vice president Seth Bloom appeared in a YouTube video to respond to criticism about client AT&T's delayed multimedia messaging service for iPhones.<sup>4</sup> The video did a pretty good job of explaining the reasons for the delay, but Bloom ambiguously identified himself as "the blogger guy with AT&T." In fact, he was the blogger relations point person on the account at Fleischman-Hillard. The issue here was one of attribution. Bloom presented himself as an AT&T employee, when he was not. The incident prompted embarrassing coverage in *Advertising Age* and charges of deceptive practices. Had AT&T had a social media policy that extended to outside service providers, perhaps this incident could have been avoided.

## **Disclosure and Transparency**

Good reputations are built on trust. If you want people to trust you, you have to be straight with them about who you are and any affiliations that may shape your opinion. Potential conflicts of interest can be handled by requiring employees to disclose their real identity and employment status when discussing company-related topics in public

channels. If an employee has a vested interest in any topic being discussed, we recommend that employee be the one to point that out. Frankly, we can't imagine a context in which you would want your employees to represent themselves as anything other than who they are, but we think you should say so in your policy.

We also recommend requiring employees to be consistent across all their public-facing social media profile pages. Conflicting information from one social media account to the next can damage an individual's credibility, and that may reflect badly on the employer. As a rule of thumb, particularly at large organizations, you should have human resources (HR) remind new employees in their welcome materials or orientation that if they intend to refer to their job or employer in social media, they should include a standard disclosure. Make sure the social media policy discourages ambiguity along these lines. When using Twitter, the profile and/or user name can fulfill this function (for example, @Richard\_at\_Dell).

Advise employees also to provide a functional means by which they can be contacted in a timely manner. If an employee starts a heated debate on a social media channel, you want to make sure he or she doesn't abandon those conversations without resolution. Employees who choose to engage in social media channels about issues related to their employer should be required to monitor feedback and respond to questions or comments in a timely manner or to notify someone else in the company to finish unresolved conversations.

One of the reasons traditional corporate gatekeepers often resist empowering unofficial spokespersons is that they've seen firsthand how the news media gets things wrong, and they fret that employees with no media relations experience will be sitting ducks for misinformation. One way to deal with this fear is to ask employees to only talk about company news or information that can be linked to on the official web site.

More disclosure and transparency issues to consider include:

1. Require that employees engage in company-related conversations only with other parties who also identify their affiliations.

2. Prohibit employees from masking their online identities.
3. Prohibit the bulk posting of messages, an unethical practice known as comment spam.
4. Insist that employees take special care when engaging directly with minors or avoid engaging with minors at all.

Not all social media disclosures are alike. The posting of a link to a press release on a branded company web site demands different disclosures than an expression of opinion.

Kodak does a particularly good job of disclosing all its business activity on Twitter through a simple web page that lists its various line-of-business and employee accounts (see Figure A.1).

Toyota, although not a B2B company, uses a custom JPEG background image on Twitter that lists the names of employees tweeting under that account, their subject matter expertise, and their individual Twitter IDs (see Figure A.2).

When objective information, such as links to press materials or other official company news is broadcast over the branded Toyota account, the tweets are left unsigned. But if any of these team members engages in conversations on the branded Twitter account, he or she assumes responsibility for what is said by signing initials. Extensive back-and-forth conversations can be transitioned to their individual accounts at the employee's discretion.

## **Compensation and Incentives**

In 2009, the Federal Trade Commission (FTC) passed laws that make it illegal to pay a blogger, or anyone else outside of an organization, to write endorsements or other social media disclosures without publicly acknowledging the financial arrangement. We believe paying bloggers or individuals to write reviews or endorsements is a form of bribery, an unethical practice, and to be avoided. Nevertheless, in some cases it may be necessary to provide bloggers with accommodations, products for review, or other promotional materials so they can evaluate and opine on your products or services. In those instances, limit the value, and require that, if exceeded, it must be disclosed on the company's web site.



### Connect with Kodak on Twitter

Follow the Kodak Corporate landscape



**Kodak**  
KodakCB



**Kodak**  
KodakCL

Keep up with Kodak community and events



**Kodak**  
KodakEvents



**Kodak Challenge**  
KodakChallenge



**Kodak**  
KodakCommunity

Watch for Consumer news and deals



**Kodak Deals**  
KodakDeals



**Kodak Connect**  
KodakConnect



**Kodak**  
KodakPrinters



**Kodak Gallery**  
GalleryExposure

Explore the latest trends in Graphic Communications



**kodakidigiprint**

Follow our International tweeters



**Kodak**  
Kodak\_DE



**Kodak**  
it's time to smile  
Kodak\_UK



**Kodak**  
c'est le moment de sourire  
Kodak\_FR



**Kodak**  
E ora, sorridi.  
Kodak\_IT



**Kodak**  
Es hora de sonreír  
Kodak\_ES



**Kodak**  
время улыбаться  
Kodak\_RU



**Kodak**  
it's time to smile  
Kodak\_AU



Figure A.1 Kodak Social Media Presence.

The image shows a screenshot of the Toyota Twitter profile page. The profile header includes the Toyota logo, the name 'Toyota', and the bio 'moving forward'. Below the header, there are several tweets. Three arrows originate from labels at the bottom of the page and point to specific elements on the page:

- An arrow labeled "Team Tweeters" points to the "Account Contributors" section on the left side of the page.
- An arrow labeled "News Stands Alone" points to a tweet from Toyota about the Sienna "Swagger Wagon Supreme" almost being done.
- An arrow labeled "Conversations are Owned" points to a reply tweet from @briannabelote to the Sienna tweet.

Figure A.2 Toyota on Twitter.

To help companies comply with the new FTC guidelines, the Word of Mouth Marketing Association (WOMMA) has a “Social Media Marketing Disclosure Guide” that suggests disclosure language such as, “I received <item> from <company>,” “I received <item> from <company> to review,” “I was paid by <company> to review,” and “I am an employee or representative of <company>.” In the case of Twitter, WOMMA recommends using hash tag notations like #spon (sponsored), #paid (paid), or #samp (sample).



## **Respectfulness**

Encourage employees to be mindful of your company's core values in their social media disclosures. Of all the factors that could contribute to an unflattering representation of your organization by an employee, lack of respectfulness or intolerance is the most common cause.

Disrespectful behavior like harassing others, using ethnic slurs, making personal insults, and exhibiting racial or religious intolerance is probably already restricted by your company's code of conduct policy. Extending that to your social media policy is easy enough.

Encourage employees to demonstrate respect by striving to advance conversations in a constructive, meaningful way. Solicitous product pitches that don't answer a question are disrespectful, as are tweeted links to landing pages that have nothing to do with the conversation, or loading tweets with irrelevant hashtags.

## **Privacy**

As an employer, your policy needs to protect your employees' rights to personal privacy and to keep their personal beliefs, thoughts, opinions, and emotions private. Prohibit employees from sharing anything via social media that could compromise the personal privacy of their colleagues.

Employees have the right to privacy of their physical likeness as well. That means your policy should preclude employees from sharing pictures or video of their colleagues without obtaining their permission. Disclosure of private facts about others based on speculation or unreasonable intrusion should also be off limits.

## **Confidentiality**

Employees should be restricted from referencing project details or customers, partners, and suppliers by name in all external social media channels without explicit permission. These channels should also never be used to conduct internal company business, resolve internal

disputes, or discuss confidential business dealings with outside contacts. As a rule of thumb, when in doubt, leave it out.

## **Security**

If you work at a company or organization whose facilities are possible targets for acts of terrorism or armed robbery, prohibit the use of cameras or other visual recording devices, the creation of text messages, text descriptions, e-mails, photographs, sketches, pictures, drawings, maps, graphical representations, or explanations of your facility or complex without obtaining approval of the external communications department or executive management. Social media communications are semiprivate at best. Employees should never share any information that could compromise the security of any company-owned or company-operated facility.

## **Diplomacy**

Remind employees that people with different political views, religious backgrounds, and sexual orientations may read their social media disclosures. Ask them in your policy to think long and hard before releasing a status update that could negatively impact intangibles such as corporate reputation and morale. Again, when in doubt, leave it out.

If yours is the type of company that prefers to take the high road, you may also want to discourage employees from making negative references to competitors unless the claims can be attributed to a neutral, nonpartisan third-party source by means of a hyperlink. Even then, we believe accentuating the positive is just good business sense.

## **Legal Matters**

To protect your company and employees from infringing on the copyright claims of others, you should establish guidelines for exactly how and how not to share.

These guidelines, which were inspired by the Associated Press Stylebook 2009 “Briefing on Media Law,” can help shed light on

how you might structure parameters around intellectual property ownership:

1. Employees may share links that transit users to works hosted by rightful copyright owners or their resellers without obtaining permission first.
2. Employees may share an excerpt of up to 140 characters without obtaining the copyright holder's permission, as long as the work being shared is publicly available on a rightful copyright holder's web site and provided the sharing is not being done to undermine the financial objectives of the copyright owner.
3. Employees may embed copyrighted content in social media channels without obtaining the permission of the copyright owner, as long as the embed code has been provided by a rightful copyright owner.
4. In unusual circumstances such as disasters or emergencies, where the public's right to know outweighs the financial objectives of the rightful copyright owner, employees may share copyrighted works without the permission of the copyright owner. Examples include images of a rapidly advancing wildfire, a natural disaster, or an act of terrorism.

To circumvent acts of libel, employees should be restricted from using social media to evaluate the performance of their co-workers, vendors, or partners or to criticize or complain about the behavior or actions of customers.

Employees should also be restricted from using social media channels to discuss or comment on their employer's financial performance (a critical factor at U.S.-based public companies), legal matters, or litigation.

## **During Emergencies**

Social media tools are becoming increasingly important in emergency management communications. Even in times of crisis, though,

only employees with the authority to speak on behalf of your company should be authorized to do so in an official capacity.

It's fine to encourage all employees to share official company information via social media channels during a crisis, disaster, or emergency, but be sure they limit communications to official company information. In an emergency, it's better to link to official information at the source than to try to summarize.

If an employee who isn't authorized to speak for the organization has valuable information that could benefit those affected by the emergency, require that they post a disclaimer.

If an employee decides to endorse or republish someone else's social media disclosure about your company, or a company-related topic, make sure he or she verifies that the social media disclosure being republished was, in fact, distributed by the attributed source. For example, before retweeting someone else's tweet, verify that the user cited did, in fact, distribute that tweet by visiting their Twitter account to check its origin. There have been numerous cases in which false tweets attributed to news sources were redistributed by others to promote misinformation and confusion. Anyone can make up a retweet.

## **Penalties**

Make it clear that the failure to comply with your company's social media policy may result in withdrawal, without notice, of access to company information, disciplinary action up to termination, and civil or criminal penalties as provided by law. For vendors, contractors, and agencies, state that penalties may, at the company's discretion, be enforced against the company, or the company's primary point of contact, and the company employee to which that person reports.

## **Definitions**

Company policies often include a glossary of terms. Given that everyone needs to have the same understanding of where the boundaries lie

and that the mechanics of emerging technologies may not be understood by all parties, we recommend you include a set of definitions on your social media policy as well.

Here are a few to consider. Expect them to change and be updated over time.

1. **Social media channels.** Blogs, microblogs, wikis, social networks, social bookmarking services, user rating services, and any other online collaboration, sharing, or publishing platform, whether accessed through the web, a mobile device, text messaging, e-mail, or any other existing or emerging participatory communications platform.
2. **Social media account.** A personalized presence inside a social networking channel, initiated at will. YouTube, Twitter, Facebook, and other social networking channels allow users to sign up for their own social media account, which they can use to collaborate, interact, and share content and status updates. When users communicate through a social media account, their disclosures are identified as coming from the user ID they specify when they sign up for the social media account.
3. **Profile page.** Social media account holders can customize the information about themselves that is available to others on their profile page.
4. **Hosted content.** Text, pictures, audio, video, and other information in digital form that is uploaded and available for publication. If you download content from the Internet and then upload it to your social media account, you are hosting that content. This distinction is important because it is generally illegal to host copyrighted content publicly on the Internet without first obtaining the permission of the copyright owner.
5. **Social media disclosures.** These include blog posts, blog comments, status updates, text messages, posts via e-mail, images, audio recordings, video recordings, and any other information made available through a social media channel. Social media disclosures are the actual communications a

user distributes through a social media channel, usually by means of an account.

6. **External vs. internal social media channels.** External social media channels are services that are not hosted by the company, such as Facebook. Internal social media channels are hosted by the company, reside behind a firewall, and are visible only to company employees and other approved individuals.
7. **Copyrights.** Copyrights protect the right of an author to control the reproduction and use of any creative expression that has been fixed in tangible form, such as literary, graphical, photographic, audiovisual, electronic, and musical works.
8. **Embed codes.** Unique codes that are provided to entice others to share online content without requiring the sharer to host that content. By means of an embed code, it is possible to display a YouTube user's video in someone else's social media space without requiring that person to host the source video file. Embed codes are often used by copyright owners to encourage others to share their content via social media channels.
9. **Company or company-related topics.** Examples include news and information about your industry, businesses, employees, customers, trading partners, products, and services.
10. **Official company information.** Publicly available online content created by the company, verified by virtue of the fact that it is accessible through a company-owned and company-operated domain.
11. **Links and inbound links.** A link transits a user from one domain to another. A hyperlink that transits from an external domain to your own domain is referred to as an inbound link.
12. **Tweets and retweets.** A tweet is a 140-character social media disclosure distributed on the Twitter microblogging service. Retweets are tweets from one Twitter user that are redistributed by another Twitter user. Retweets are how information propagates on Twitter.

There may be other terms you would want to include based on the social media aptitude of the community your policy is intended to serve. In our experience, the 12 terms noted here are the major areas that need to be addressed.

## **Social Etiquette Online**

Everything you need to know about social media participation, you learned in preschool: no biting, stealing, kicking, scratching, lying, or cheating. The customs and social norms we accept as appropriate in the physical world apply in cyberspace, too. In the name of specificity, spell them out.

A solid social media policy establishes guidelines for effective social media engagement enterprise-wide. Social skills are much more important than technical skills, and a social media policy needs to clearly articulate those intangible, personality-specific skills that determine an individual's strength as a team player or a community member.