



# Creating and Enforcing Social Media Policies

**O**n January 14, 2009, James Andrews was flying into Memphis to make a presentation to the worldwide communications group at Federal Express on behalf of his employer, public relations agency Ketchum Inc. Upon his arrival at the airport, he had what he called “a run-in with an intolerant individual.” The encounter prompted him to send this Twitter message: “True confession but I’m in one of those towns where I scratch my head and say ‘I would die if I had to live here!’”

Many of us have had similar thoughts about places we’ve visited, but in the days before social media, we mostly kept our opinions to ourselves. Twitter, which is the most immediate of social media tools, presents a sometimes irresistible opportunity to share impulsive thoughts with our friends. Only Twitter isn’t e-mail; it’s more like a party line. Andrews found this out to his chagrin the next morning when he was confronted by a group of indignant FedEx employees, many of them Memphis natives, who had already read and discussed his tweet. The message made it up the chain of command at the shipping service as well as to top executives at Ketchum. It also sparked an e-mail from a FedEx executive that questioned

whether the millions of dollars the company was paying Andrews' agency was money well spent.

Ketchum kept the FedEx account and Andrews didn't lose his job, but the incident epitomizes the vulnerability that all organizations face these days to the words and actions of individual employees.

Prior to the arrival of social media, few businesses needed a detailed policy laying out all aspects of public disclosure. They hired skilled media relations, investor relations, and public affairs people to do that. But now that social media makes it easy for anyone to make public disclosures, the rules have changed. Not long ago, the marketing department's job was to media-train a few executives. Today, the challenge is to media-train the entire company.

Social media policies have been around since the early days of blogging, and their content and tone vary widely depending on the company's attitude about online conversations, the regulatory and legal environment, and the characteristics of the employee population. They range from just a few hundred words to many thousands. The best policies are more than just rules; they guide employees on how to use social channels to the greatest benefit for the organization.

There are some excellent online resources on this topic. Chris Boudreaux has assembled more than 130 organizational social media policies at [socialmediagovernance.com](http://socialmediagovernance.com). There's a somewhat smaller database of policies at [ComplianceBuilding.com](http://ComplianceBuilding.com)<sup>1</sup> and on the Altimeter Group wiki.<sup>2</sup> Eric Schwartzman, co-author of this book, has published his social media policy template at [socialmediapolicytemplate.com](http://socialmediapolicytemplate.com). These documents offer valuable guidance on what other companies are doing, but we recommend against simply copying and pasting your own company name into somebody else's document. An effective policy equips everyone in the enterprise with practical guidelines so that they can serve as your brand ambassadors.

## **Why Not Use Existing Policies?**

That's a fair question. You probably have standards of employee behavior in place, and it might be easier to just beef them up to cover social media. The problem with that approach is that the guts of a

social media policy—the purpose, definitions, objectives, principles, and the guidelines themselves—are mostly unique to the medium. You’ll need to review your existing policies in the course of creating new ones. Start with your company’s code of conduct policy, information technology policies, and any ethics or compliance policies and make sure any references to public disclosures, company information, and information security are up to date.

Here are a few things to look for:

- In the pre-Internet days, public disclosures were mainly limited to press releases, public filings, statements to the news media, and marketing brochures. Today, a Facebook status update may qualify. If your code of conduct discusses public disclosure, make sure the definition is current for all possible venues for such disclosure.
- If your code of conduct restricts employees from using company property for personal gain, consider how that might apply to a scenario in which an employee amassed a Twitter following as an outgrowth of his work on behalf of the company. Technically, that person would be in violation of company policy, even though his actions support your larger corporate objectives. Consider amending the existing policy to restrict employees from using company property “solely” or “exclusively” for personal gain.
- Make sure your information security policy distinguishes between confidential and public company information. A good rule is to say that if you can link to it, you can share it.
- Extend whatever responsibilities employees have to protect company information to cover external services. For example, posting a confidential document to Google Docs may be an unacceptable breach of security, even if the document is technically private, because the responsibility for security would be, in effect, transferred to Google.
- If your policy restricts employees from using company information systems to make solicitations, revise that to specify “inappropriate solicitations,” since a good use of social media is to solicit information.

- Consider extending user ID and password control parameters with language such as “user names and passwords used to establish a social networking account on behalf of the company, and the direct URL to all company-branded social media accounts, must be registered with information security management.” That way, an employee can’t leave on bad terms and take control over the company’s Facebook presence. This actually happened to one of Paul’s clients. The manager of a local franchise quit in a nasty dispute with management and took with him the logon credentials to the franchise’s Facebook page.
- Guidance on effective password management probably belongs in the security controls policy rather than the social media policy.
- Check out your company policy on e-mail use as well. It’s not uncommon to find a clause restricting employees from including any personal information in their signature block, another counterproductive requirement, since the people we exchange e-mails with are often different from our social networking contacts, and links in a signature block to Facebook, LinkedIn, and Twitter pages can be a great way to cement relationships in the social sphere.

## Corporate Policy Making 101

In large organizations, developing corporate policy is not unlike the legislative process. You need to assemble a coalition of influential stakeholders to support your initiative. Smart policy makers aim to appease a broad coalition of stakeholders. They clear the major hurdles first, even if that means leaving some stones unturned initially. They accept that perfect is the enemy of good and work to establish frameworks that can be improved over time.

In the case of social media policy, assembling stakeholders is probably the most challenging part of the process because of the generation gap. Forrester Research estimates that 30 percent of Americans older than age 55 don’t use social media in any capacity. It’s likely that many of the stakeholders you’ll need in your coalition won’t even understand why these tools are important.

Also, different stakeholders have different agendas. Here are some of the risks and opportunities that you may encounter.

<b>Department</b>	<b>Risk</b>	<b>Opportunity</b>
Human Resources	Violation of existing policies by employees Policing policy	Build goodwill with workforce Aid in recruiting
Information Technology	Information security and data loss	Reduce support requests from use of cloud services
Legal	Liability for unclear social media guidelines	None
Marketing	Aggravation of disparities between brand message and market perception	Reduce costs and increase efficiencies by enabling marketplace to self-educate
Customer Service	Productivity loss Complexity of enhancing existing CRM software Customer privacy violations	Increase efficiency through enhanced one-to-many communications
Public Relations/ Public Affairs	Employees' going "off message"	Communicate with wider audience Build stronger relationships with key communities
Compliance Officer	Lack of control over third-party channels Noncompliant behavior Enforcement of controls and corrections	Increase channels of communication Get "credit" from regulators for being proactive
Investor Relations	Violation of SEC Regulation Fair Disclosure Responsibility to update and nonselectively engage	Increase channels to investors and analysts
Executive Management	Upsetting the status quo	Thwart obsolescence and building a culture that embraces change

When you're deciding whom to approach in a given department, look for the most influential person who's going to require the least education. But you also want a single point of contact who has the ability to relay the rationale for developing the policy.

You can figure out who's up to speed on social media by asking people or by searching for names on relevant social sites. Request a meeting, brief the person on your initiative, and ask what that person would like to see a social media policy cover. Write down concerns to ensure that you can address them in the policy, and ask the person if he or she would be willing to serve as the department's point person. Explain that the person will be asked to review drafts as they are circulated and provide any feedback or recommendations along the way to make sure the intended policy meets the department's aims.

Try to find stakeholders who are unlikely to transfer to another department or leave the company. You don't want to have to start over again with a new stakeholder who may be hostile or disinterested. Make sure stakeholders are actively involved in the review and approval process so they take ownership of the result.

## **Sequencing the Chain of Events**

Nab the most influential stakeholders first to make it easier to get others on board. Also, pay attention to the order in which you circulate your policy draft for review. Give first copies to those who are the most influential and educated about social media. As you progress through your request for comments review sequence, make it known who's seen it already; that's an implied endorsement to those further down the review chain.

Inadvertent sequencing derailed the initiative at a very large, public, regulated company where Eric was engaged to help create a social media policy. Rather than being circulated to the stakeholders as had been agreed, the initial draft for review somehow was sent to an attorney in the company's legal department who was not a stakeholder. As a result, the policy was essentially gutted of any useful guidance and replaced by three pages of legalese. The revised initiative didn't provide meaningful guidance to employees and was difficult for lay people to understand.

This raises an important point. To be useful, a social media policy must also be accessible. Let's talk for a moment about language.

## **Threat of “Bureaucratese”**

In their zeal to limit corporate liability and obfuscate unintended consequences, legal advisers tend to pile on jargon that ultimately strips contracts of the meaning they are intended to convey. This undermines the whole effort, because the social media policy is as much a statement of principle as a set of rules. In a late 2009 analysis of 46 social media policies (Analysis of Social Media Policies: Lessons and Best Practices), SocialMediaGovernance.com creator Chris Boudreaux noted that “only one-third of sampled organizations portray social media as a positive opportunity for employees and their organization.” In other words, most companies are playing defense. The message to employees is that social media can only get them into trouble. What a missed opportunity!

Contrast this with IBM's policy, which is often cited as one of the best. In the introduction, it states, “It is very much in IBM's interest—and, we believe, in each IBMer's own—to be aware of and participate in this sphere of information, interaction and idea exchange.” In other words, using these tools is good for your career and for the corporation.

The language you use in your social media policy affects your corporate reputation. An easy to understand, reasonable policy posted online is a public disclosure of your company's regard for its employees. Social media is now an integral part of our social fabric. Recognizing this and offering proactive guidance that's easy for everyone to understand becomes a public relations activity as well, generating goodwill among existing employees, demonstrating fairness to job seekers, and giving you a potential edge over your competitors.

Clarity is about language, but it's also about anticipating difficult situations and offering guidance about how to proceed. In this respect, a lot of policies still come up lacking, according to Boudreaux. He notes, in particular, that few policies offer guidelines for the use of specific social networks and almost none cover use of company

trademarks. “Support your employees and let them know where your boundaries lie,” he writes. “Don’t leave them guessing.”

But whether you opt for a broader policy and a separate set of guidelines, one official policy that works for all parties, or a general policy for all employees and supplemental policies for specific business units, there is a core set of issues that you need to address. In the Appendix, we offer item-by-item advice on what topics to include in a social media policy.



