

Managing Risk

Below is a social media policy from Dresser at PandaDoc. The template is a contract that organizations can use to hold their social media representatives accountable to company standards: In the interest of brevity, the form is completed as it can be applied to both the APRC and the GCWC. The APRC has employees while the GCWC has primarily Commissioners. Below is the contract that employees or Commissioners would sign as they engage in social media. Those items in black would be considered for both organizations while those items in red are additional items to include in the policy contract for the APRC.

Social Media Policy for the APRC and GCWC

1. Guiding statement

As an active member of the business community, [APRC/GCWC] realizes the value and importance of social media for business promotion and practices. We also recognize the growing influence of social media and its widening scope. [APRC/GCWC] has implemented the following social media policy to help our employees/Commissioners understand and adhere to standard responsible social media practices, put in place to protect the employees/Commissioners, their jobs/roles, and [APRC/GCWC] as a whole.

Any employee/Commissioner of [APRC/GCWC] may elect to create a blog, contribute online, or participate in an online social network of any kind. Policies regarding employee/Commissioner activity and conduct, apply to activities on social media or other forms of online publishing.

2. Policies for social media

Any time you participate in social media, you are posting on your own behalf unless expressly requested by [APRC/GCWC] to post on the company's behalf (i.e., social media, marketing responsibilities). Any posts on social media or other online publishing should be made under your own name.

When posting anything that may be associated with you professionally, it is vital that you post a disclaimer such as: "the opinion expressed here is entirely my own and does not necessarily represent the views or opinions of [APRC/GCWC]."

If you identify yourself as a [APRC/GCWC] employee/Commissioner via social media, your opinions and viewpoint must reflect the responsibilities of your position. Always adhere to copyright standards and respect the intellectual property of others when utilizing social media platforms or other online publishing forms.

Do not, under any circumstances, disclose any personal information about the APRC/GCWC or its employees/Commissioners.

Do not disclose confidential information about [APRC/GCWC], its practices, or any information

meant to be shared only with fellow employees/Commissioners.

Any rumors, slander, or confidential information shared via social media may have a significant negative impact on this company and its reputation. Legal action may be brought against the individual responsible for the publication of this information.

Remember that, as an employee/Commissioner, you are an ambassador for the [APRC/GCWC], and your manner in all situations, including online, should reflect that in a positive way.

APRC specific: While on company time or company computers, no employee shall, at any time, share anything with another employee via social media that may be considered inappropriate or fall under the category Not Suitable for Work--known online as NSFW. This includes items of a sexual, profane, or excessively violent nature. These have no place in the work environment, and disciplinary action may occur.

3. Best practices

Always respect your audience. In every situation, use social media as a respectful tool to share ideas and information. Be especially mindful when dealing with sensitive subjects such as politics and religion.

Share content intelligently. If you publish an item professionally, you may help to strengthen the community of [APRC/GCWC]. Make sure what you publish is helpful, valuable, and promotes the principles of this organization.

Protect your privacy. Always think twice before posting, and remember that what you share may remain in the public domain for a long time afterwards. Make sure you are protecting your own privacy and that of the organization.

APRC specific: Employees are responsible for ensuring that their online activities do not interfere with their ability to perform their job, or to fulfill commitments to their managers, co-workers or clients.

4. Acceptance

I attest that I have read this Social Media Policy in its entirety and do understand all policies contained therein. I will uphold the standards set forth in this document, and will maintain appropriate and professional conduct when accessing social media.

Employee/Commissioner Name: [FirstName] [LastName]

Title: [TITLE]

Signature: _____

Date: _____

Expanded media policy

Overview

Social Media - any online tool or application that goes beyond simply providing information, instead allowing collaboration, interaction, and sharing. Examples of social media include: blogs; microblogs; wikis; photo and video sharing; podcasts; virtual worlds; social networking; social news and bookmarking; web conferencing and webcasting (Office of Environmental Information, 2014).

Because of the evolving nature of social media platforms, these guidelines do not attempt to name every current and emerging platform. Rather, they apply to those cited and any other online platform available and emerging, including social networking sites and sites with user-generated content. Examples include, but are not limited to the following: YouTube, Google+, Facebook, Flickr, LinkedIn, Twitter and blogs (Vanderbilt University Medical Center, n.d.).

Remember that all content contributed on all platforms becomes immediately searchable and can be immediately shared. This content immediately leaves the contributing individual's control forever.

Personal social media activities

The policies below are from Sutter Health. Although the organization is primarily a medical center, their policies can also be applied to the GCWC.

1. The guidelines in this section apply to an individual's personal social media activities that may give the appearance they are speaking on behalf of the [APRC/GCWC] or which may create significant risks for the organization.
2. [APRC/GCWC] recognizes that individuals engage in social networking. At times individuals may use social networking sites to express displeasure about the organization, their work experience or about the leadership or peers. **APRC specific: Nothing in this policy prohibits employees from discussing the terms and conditions of their employment.**
3. The procedures below apply to all individuals and are designed to reduce the likelihood that their personal social networking activities will have an adverse effect on themselves, the [APRC/GCWC], peers, clients, or the organization's mission.
 - a. **APRC specific: Individuals should limit participation in social media activities during work time unless required by their position; incidental use occurring during break times or in a manner that is consistent with other general internet use is not prohibited by this policy. Under no circumstances may an individual access social media on mobile devices while driving for work related reasons or performing other safety sensitive work functions.**

b. Individuals must speak for themselves and not on behalf of the [APRC/GCWC] unless authorized to do so. If an individual posts content online in a personal capacity and it is relevant to the [APRC/GCWC], a disclaimer should be provided (e.g., “The postings on this site are my own and don’t necessarily represent the [APRC/GCWC]’s positions, strategies or opinions.”).

c. Under no circumstances may Individuals post fake blogs, create false positive or fake negative reviews of the [APRC/GCWC], its policies and services or its industry peers; nor may individuals impersonate someone associated with or speaking about the [APRC/GCWC].

d. Individuals may not use the [APRC/GCWC]’s logos, trademarks or proprietary graphics that would create the appearance they are speaking on behalf of the organization without prior authorization from leadership.

e. APRC specific: Individuals may not use or disclose any client identifiable information of any kind, including client images, on any social media platform or smartphone application without the express written authorization of the client. Even if an Individual is not identified by name within the information at issue, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA), state law, and/or APRC’s policies. Additionally, online activities regarding clients within the APRC that may compromise a client’s personal dignity or otherwise make them question the confidentiality of the services provided by the Center are prohibited.

f. Individuals may not disclose any confidential information of or about the [APRC/GCWC], its organizational partners or clients.

g. Individuals are responsible for any publicly viewable intentionally false statements that damage the [APRC/GCWC] or the organization’s reputation.

h. Individuals shall not use social networking activities, including personal e-mail and mobile (text) messaging, to transmit, receive, or store information regarding the [APRC/GCWC], its employees, leadership team or clients that is illegal, discriminatory, harassing, libelous, slanderous, and/or protected under HIPAA or state law or which is considered confidential information.

i. Some topics present significant risk to the organization and should not be discussed on social media-even where individuals express their own opinions and provide a disclaimer. Non-exhaustive examples of topics that should not be discussed include:

- Speculation about the organization’s future performance, strategic plans, or unannounced strategies; non-public information about financial performance, changes in financial performance or liquidity; sensitive information involving industry peers.

- j. If an individual is unsure of the sensitivity of a particular subject, he/she should seek advice from the leadership team before participating in the conversation.
- k. Individuals shall not announce news about the organization that is not already made public. Only those officially designated by the organization have the authorization to speak on behalf of the organization.
- l. If an individual is contacted by a blogger, online journalist or media representative about the organization (news, network operations, policies, practices, strategic commitments or additional business information), he/she must notify the leadership team before responding.
- m. Individuals are more likely to resolve complaints about the organization by speaking directly with the leadership team or peers than by posting complaints on the internet.
- n. **APRC specific: Any individual who violates this social media policy will be subject to appropriate remedial action; in the case of employees, this may include discipline, up to and including termination.**

Social media communication (from the organization)

The below policies for how the organization should handle the moderation of comments from social media posters have been gleaned from the EPA.

When you are working in your official capacity while online, you are still representing the organization; set forth below are several general ethics areas of concern.

- Do not say anything online that you would not say in a speech in your official capacity.
- Do not misuse your position for your own gain or to help others inappropriately.
- Do not endorse any product, service, company, non-profit organization or any other enterprise. There are some exceptions but, generally, you should be careful about giving an appearance of organizational sanction or endorsement.
- Do not divulge nonpublic information. This includes any information designated as confidential, privileged, or any other type of information that may not be disclosed, even if someone else asks you for it.
- Do not engage in any partisan political activity (South Carolina Budget & Control Board)
- When writing in your official capacity, do not write anything that could appear to be legal or medical advice. Legal or medical issues should be handled through the appropriate channels to avoid conflicts and other ethical problems.

Some types of social media allow users to add comments, e.g., blogs, YouTube, Facebook. When the tool allows it, accept comments in accordance with the following requirements:

- Moderate all comments before they are public if the tool allows pre-moderation (commenter comments, administrator/moderator of the tool reviews the comment and posts it publically).
- If comments cannot be moderated before posting, they must be reviewed as soon as possible during business hours after they are public. This is sometimes referred to as “post-moderation.” Ex. Facebook is a tool that does not have provisions for pre-moderation but does allow for post-moderation.
- Any comments that are removed or not posted due to comment policy violations should be documented by the moderator.

Social media communication guidelines (for the public)

These guidelines are to be posted on the APCR/GCWC website so the public will know the rules under which the organization engages in social media. These guidelines are from the Fairfax, VA county government.

Facebook Comments Policy

The purpose of this site is to present matters of public interest in the organization. We encourage you to submit your questions, comments, and concerns, but please note this is a moderated online discussion site and not a public forum.

We recognize the web is a 24/7 medium, and your comments are welcome at any time. However, given the need to manage our resources, we generally only monitor comments and postings during regular business hours.

Once posted, the [APRC/GCWC] reserves the right to delete submissions that contain:

- Vulgar language
- Personal attacks of any kind
- Comments or content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, genetics, status with regard to public assistance, national origin, physical or intellectual disability or sexual orientation
- Spam or links to other sites
- Subjects that are clearly off topic
- The encouragement of illegal activity
- Promotions for particular services, products, or political organizations
- Infringe on copyrights or trademarks
- Personally identifiable confidential information
- Information that may compromise the safety, security or proceedings of public systems or any criminal or civil investigations.

If there are repeated violations, the organization will ban participation on platforms that permit us to ban users.

Twitter-specific

Following

The [APRC/GCWC] does not automatically follow organizations or individuals who follow it.

The [APRC/GCWC] may follow relevant organizations, including government agencies, and other parties where there is a clear link in communicating and receiving information.

Being followed by the [APRC/GCWC] does not imply endorsement of any kind.

Un-following

As part of account maintenance and monitoring, the [APRC/GCWC] regularly reviews accounts it is following. This may result in un-following accounts.

Retweeting

Reactive re-tweeting: The organization may occasionally be asked to re-tweet content from other Twitter users. The organization will consider these on a case-by-case basis.

Proactive re-tweeting: The organization will actively seek opportunities to re-tweet content that helps position the organization as a filter of subject matter expertise and inclusive/supportive of stakeholders.