

**Purpose**

The purpose of a Social Media Policy is to uphold the standards and reputation of XXX, our employees and our stakeholders.

1. Establish constructive, fair and implementable protocols by which our employees can conduct responsible, practical social media participation in both official and unofficial capacities.
  2. Promote a safe environment for employees to share subject matter that is not proprietary or confidential to XXX and/or the individuals that we serve.
  3. Prepare our company and employees to utilize social media channels to help each other and the communities served, particularly in the event of a crisis, disaster or emergency.
  4. Protect our company and employees from violating Municipal, State or Federal rules, regulations or laws through social media channels.
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**Policy**

Whether or not an employee chooses to create or engage in a blog, wiki, online social network or any other form of online publishing or conversation is his/her own decision. However, XXX recognizes that surfacing online partnerships are essentially changing the way individuals and organizations communicate, and this policy is designed to offer constructive navigation for responsible, practical communications via social media channels for employees. This policy applies to multi-media, social networking websites, blogs and wikis for both professional and personal use.

The same principles and guidelines that apply to the activities of employees in general, as found in the XXX Code of Ethics Policy, apply to employee activities in social media channels and any other form of online publishing.

XXX fully respects the legal rights of our employees, including their rights under the National Labor Relations Board to participate in united and protected activities, and any part of this policy which obstructs or hinders the legal rights of our employees will not be prescribed. In general, what an employee does on his/her own time is his/her affair. However, activities in or outside of work that affect an employee's job performance, the performance of others, or XXX' business interests are a proper focus for company policy.

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1. Social Media Channels - Blogs, micro-blogs, wikis, social networks, social bookmarking services, user rating services and any other online

## Definitions

collaboration, sharing or publishing platform, whether accessed through the web, a mobile device, text messaging, email or any other existing or emerging communications platform.

2. Social Media Account – A personalized presence inside a social networking channel, initiated at will by an individual. 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 a user communicates through a social media account, their disclosures are attributed to their User Profile.
3. Social Media Disclosures - Blog posts, blog comments, status updates, text messages, posts via email, images, audio recordings, video recordings or 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 their social media account.
4. External vs. Internal Social Media Channels – External social media channels are social media services that do not reside at a domain. Internal social media channels are located at a company- owned domain, require a password to access and are only visible to employees and other approved individuals.
5. User Profile – Social Media Account holders customize their User Profile within a Social Media Channel with specific information about themselves which can be made available others users.
6. 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 works, graphical works, photographic works, audiovisual works, electronic works and musical works. It is illegal to reproduce and use copyrighted material through social media channels without the permission of the copyright owner.
7. Hosted Content – Text, pictures, audio, video or other information in digital form that is uploaded and resides in the social media account of the author of a social media disclosure. If you download content off of 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.

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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 account without requiring that person to host the source video file. This distinction is important because embed codes are often used by copyright owners to encourage others to share their content via social media channels.

9. Controversial Issues – Issues that form the basis of heated debate, often identified in political campaigns as wedge issues, since they provoke a strong emotional response. Examples include political views, health care reform, gun control and abortion. Religious beliefs may also be controversial, particularly to those intolerant of beliefs different from their own.
10. Official Content – Publicly available online content created and made public by XXX, verified by virtue of the fact that it is accessible through our company website.
11. Inbound Links – An inbound link is a hyperlink that transits from one domain to another. A hyperlink that transits from an external domain to your own domain is referred to as inbound link. Inbound links are important because they play a role in how search engines rank pages and domains in search results.
12. Link Bartering Exchanges – Trading or purchasing inbound links from other domains exclusively for the purposes of lifting your domain in search engine page results.
13. Tweets and Retweets – A tweet is a 140 character social media disclosure distributed on the Twitter micro-blogging service. Retweets are tweets from one Twitter user that are redistributed by another Twitter user. Retweets are how information propagates on Twitter.

**Principle  
Guidelines**

1. Our 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 engaging. Employees should never use social media for covert advocacy, marketing or public relations. If an employee comments on any aspect of the company's business they must clearly identify themselves as an employee and include a disclaimer.  
The disclaimer should be something like "the views expressed are mine alone and do not necessarily reflect the views of XXX."

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2. Only those officially designated can use social media to speak on behalf of our company in an official capacity, though employees may use social media to speak for themselves individually or to exercise their legal

rights under the National Labor Relations Act. Employees should neither claim nor imply that they are speaking on the company's behalf.

Internet postings should not include company logos or trademarks unless permission is asked for and granted by the Managing Member. Corporate blogs, Facebook pages, Twitter accounts, etc., could require approval when the employee is posting about the company and the industry. In addition, XXX reserves the right to request that certain subjects are avoided, withdraw certain posts, and remove inappropriate comments.

3. When you see misrepresentations made about XXX by media, analyst, bloggers or other social media users, you may certainly use your blog, social networking account, or someone else's to point that out. But you may only do so in an official capacity if you follow the terms of this policy.
4. Different social media channels have proper and improper business uses. For example, members of social networks are expected to read, and when appropriate respond, to questions asked of them from another member of their social network. It is important for employees to understand what is recommended, expected and required when they discuss work-related topics, whether at work or on their own time.
5. Employees are responsible for ensuring that all agencies with whom the company has a formal relationship are not discussed in a negative or derogatory manner on public conversation areas or on social media.
6. Employees are responsible for making sure that their online activities do not interfere with their ability to fulfill their job requirements or their commitments to individuals served, team members, co-workers and administrative staff.
7. Employees are responsible for ensuring that all HIPAA laws and regulations are abided by when utilizing social media channels. This includes sharing names, consumer documents, photos and all other protected information concerning the individuals in which we serve. In addition, XXX employees may not post photos of individuals in which we serve on any personal accounts since the signed release is for the XXX website only.

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*APPROVAL*

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