## MAP Social Media Policy

The Michigan Advocacy Program (MAP) recognizes that social network sites such as Facebook, Twitter, LinkedIn, list serves and sites dedicated to blogging can offer opportunities for outreach, information sharing, and interaction related to MAP's program work.

This Social Networking Policy (Policy) applies to all MAP employees using social media on behalf of MAP whether within or outside the scope of their employment. This policy covers all employees of MAP's Legal Services of South Central Michigan (LSSCM) division; Farmworker Legal Services (FLS) division; and Michigan PLP LLC division.

## Part I: MAP's Social Media outlets

For purposes of this policy, social media is defined as any personal websites, Web logs (blogs), interactive chatting (chat rooms), bulletin boards, social networking pages (i.e. Facebook and Twitter), video-sharing sites, email, or any other form of self-expression and communication transmitted via the Internet.

- a) MAP may, from time to time, create specific websites, social media accounts, or other web presences to support and advance the interests of MAP and its affiliated programs. MAP will identify administrators and content contributors for these web presences.
- b) MAP will ensure that employee participation in the use of these communications maintains and protects MAP's integrity and reputation and minimizes actual or potential legal and ethical risks, including but not limited to the disclosure of confidential information, harassment, disparagement, violations of protected trademarks, unauthorized endorsements, or the dissemination of false or misleading information.
- c) Individuals using MAP resources for social media purposes are expected to protect the interests of MAP, its employees, and clients, and are prohibited from disclosing personal employee and non-employee information and any other proprietary and nonpublic information to which they may have access. Such information includes but is not limited to client information, financial information, and any other information related to MAP's operations. Users are also prohibited from posting communications that may be considered disparaging, harassing, endorsing or disseminating false or misleading information. If uncertain whether any information, material or conversation meets these criteria, the user should discuss the content with their supervisor/manager.
- d) All employees must identify themselves as employees of MAP or a MAP affiliate when posting comments or responses about MAP or any MAP affiliate on any social medium, whether owned, maintained, or supervised by MAP or not. Attorneys may have a heightened duty to identify themselves as lawyers and to comply with relevant ethical standards, including but not limited to refraining from offering legal advice or from soliciting legal work.

- e) Any use of copyrighted information must have written reprint authorization before being posted on any MAP website or web presence.
- f) Program managers are responsible for ensuring that all posted information within the sphere of their responsibilities complies with these policies and guidelines for social media. Program managers are authorized to remove any content that does not meet the guidelines of the social media policy or that may be illegal or offensive. Removal of such information may be done without permission of the blogger or advance warning. Participation in any MAP website or web presence does not create any rights for the poster in the content or process.
- g) Although communication in social media sites may have an informal tone, correct spelling and grammar will be followed.
- h) Each manager overseeing a social media site (or an employee who is responsible for maintenance of a social media site) shall have a risk plan and know what to do if a negative comment is posted on a site. This plan shall provide guidance on determining what is acceptable or unacceptable and how to address any unacceptable postings.
- Only managers may authorize social media activities on behalf of MAP or its affiliates. All significant social media activities must be approved in advance by central management and IT staff.
- j) All MAP social media sites must be reviewed and updated on a regular schedule.
- k) MAP expects all users of social media abide by all rules and guidelines of the MAP social media policy. MAP reserves the right to block or ban users from its sites.
- I) To promote constructive dialogue, the following guidelines apply to and will be posted on each social network website maintained on behalf of MAP:
  - Abusive, harassing, defamatory, threatening or obscene language is not permitted. MAP (or its affiliate) reserves the right to delete comments that are deemed inappropriate.
  - Keep comments interesting and relevant. Irrelevant or poorly written comments will be removed.
  - Do not use comments to promote a product or service for commercial or personal gain.
  - Do not discuss or misuse proprietary or confidential information; always give people proper credit for their work.

- Correct errors in a comment quickly and if appropriate, modify an earlier comment to make it clear that you have corrected an error.
- Before commenting, review the social network's terms of use and obey them.

## Part II: Use of Social Media by MAP Employees

For purposes of this policy, social media is defined as any personal websites, Web logs (blogs), interactive chatting (chat rooms), bulletin boards, social networking pages (i.e. Facebook and Twitter), video-sharing sites, email, or any other form of self-expression and communication transmitted via the Internet.

- a. No MAP or MAP-affiliate employee shall maintain a personal website, blog, chat room, bulletin board, social network page or video-sharing site from any MAP-owned computer equipment. This specifically includes non-work related Facebook and Twitter communications.
- b. No MAP employee shall, for non-work related purposes, participate in a personal website, blog, chat room, bulletin board, social network page or video-sharing site using any MAP-owned computer equipment.
- c. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site using computer equipment not owned by MAP, employees should use judgment and caution if they choose to identify themselves as employees of MAP or any MAP affiliate. Employees who choose to publicize their association with MAP may cause readers to believe they are speaking on behalf of MAP. Therefore if an employee wishes to publicize his/her association with MAP in the maintenance of a personal website, blog, or other social media site, the employee's communications should be transparent, ethical and accurate. Any such communication must make it clear that the employee is speaking on his or her own behalf, not on behalf of MAP or any MAP affiliate.
- d. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site using computer equipment not owned by MAP, no employee shall make use of any MAP or MAP-affiliated trademark or other intellectual property belonging to MAP.
- e. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site using computer equipment not owned by MAP, no employee shall disclose any information that is confidential or proprietary to MAP or publicize the name or personally identifying information of any person or entity that has disclosed such information to MAP (i.e., clients, social service organizations, etc.)

- f. MAP's policies regarding confidential information, plus the Michigan Rules of Professional Conduct, shall determine what is to be considered "confidential information" for the purposes of this policy.
- g. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site, no employee shall make any disparaging statements about MAP, its personnel, policies, its clients, its vendors or other legal services providers.
- h. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site, no employee shall identify himself or herself as an employee of MAP or any MAP affiliate if she/he makes comments which disparage or demean other persons on any basis related to race, gender, religion, nationality, or sexual orientation.
- In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site, no employee shall make comments or statements that attack, humiliate, threaten or abuse other employees of MAP or any MAP affiliate.
- j. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site, all employees of MAP are strictly, personally and solely liable for the contents thereof. MAP assumes no responsibility for such materials.
- k. In the maintenance of a personal website, blog, chat room, bulletin board, social network page or video-sharing site, no employee link to any MAP internal website.
- In the event that management perceives any communication activities in violation of this policy by an employee as negatively impacting MAP, its personnel or its clients in any respect, management may direct the employee to cease such communications.
- m. Violations of this policy may result in disciplinary action, up to and including termination of employment.

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