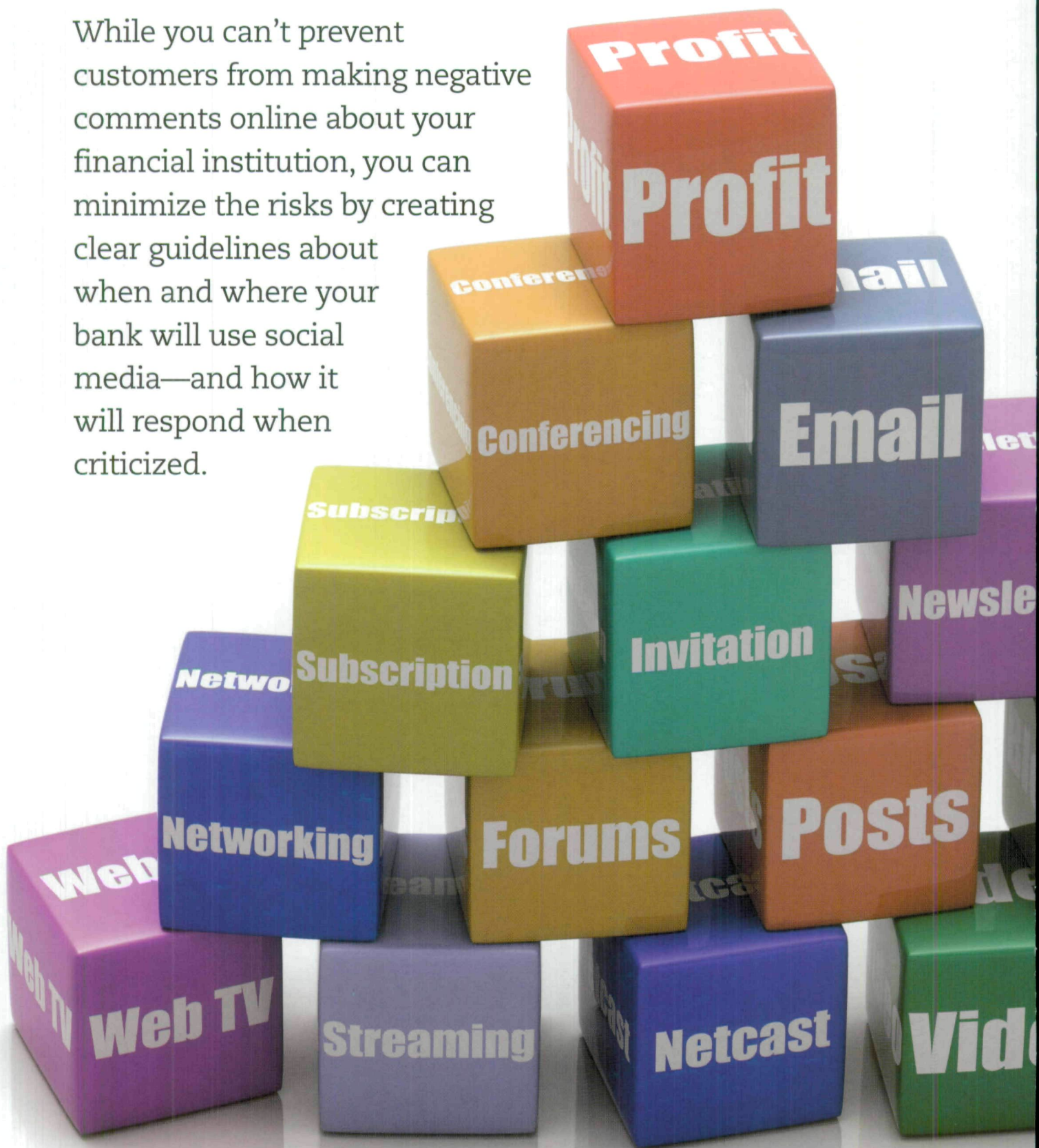While you can't prevent customers from making negative comments online about your financial institution, you can minimize the risks by creating clear guidelines about when and where your bank will use social media—and how it will respond when criticized.

Building a Social Media Policy

BY AMBER FARLEY

BANKS CAN DO LONGER IGNORE SOCIAL MEDIA'S PRESENCE AND THE IMPACT IT IS HAVING on how consumers interact and gather information online. Even if your bank is not participating in social media, your employees *are*—especially in their personal lives outside of work. The chances are good that as you read this article, community members, customers and/or employees are talking about the bank in some manner via social media.

Social media can certainly present banks with risks in the workplace, regardless of whether or not the bank is participating directly. Such risks are manageable as long as they are acknowledged by the bank and mitigated with a properly executed plan and policy. Risks present the greatest threat when banks fail to acknowledge their existence. Knowledge of social media risks as it relates to organization and/or employee usage will enable your bank to craft a formal, written social media policy that is consistent with your overall mission, goals and appetite for risk. While a policy won't eliminate negative comments on social media from occurring, it can minimize the risks by providing employees with clear guidelines to follow when dealing with negative situations.

Social media use has become ubiquitous with today's consumers and has empowered them to become creators of online content. Before social media came along, consumers were primarily forced to *listen* to messages directly from organizations Companies were "pushing" brand and product information to consumers via traditional media outlets. Yes, word-of-mouth has always been involved as well, but not to the extent that it is today. Social media is an extension of word-of-mouth delivery. Today, consumers pull the information they want, when they want it. Consumers trust peer opinions, product reviews and feedback from friends and family above advertisements or any other form of external information pushed to the public by the organization. The rise of social media, therefore, means that our responsibilities as bank marketers have gotten a bit more complex.

Social media is often thought of in terms of a handful of well-known social media sites, such as Facebook, Twitter, and so forth, but it is actually much more than these few sites. Social media encompasses the Internet technologies that enable consumers to easily share content online, including but not limited to, social networks, blogs, videos, photos, wikis, online reviews, online check-ins and more. There are thousands of social channels, networks and media tools—and the list is growing.

Currently the four networks most popular with community banks are Twitter, Facebook, YouTube and LinkedIn. Facebook now has over 500 million users. Over 3 billion videos are viewed each day on YouTube. Twitter processes over 155 million tweets per day and LinkedIn has over 100 million members. Even though these are the most popular at the moment, it won't always remain the case. Google+ for instance, launched in the summer of 2011 and already has over 10 million users. Social media is a phenomenon that shows no sign of slowing down anytime soon.

When your bank starts to develop a social media policy, keep in mind that the policy is a document used to guide employees in the use of social media throughout the workplace. Therefore, there are multiple departments within the bank that need to be involved in developing this policy. Executives, marketing, public relations, human relations, compliance, legal and employees can all contribute to different elements of the policy.

The rise of social media, therefore, means that our responsibilities as bank marketers have gotten more complex.

Below are 10 guidelines to follow when drafting your social media policy:

1. Purpose
Outline the purpose and scope of the policy as well as explain how the bank is adapting to various online communications methods and why the policy is being implemented in the first place. Explain what the bank considers to be social media and why the bank is or is not involved with it directly. If the bank *is* involved in social media, it should list the organization's goals and objectives with respect to social media—as well as the channels that will be utilized.

2. Management Details
Within the management section of the policy, the bank should clearly state who is approved to speak on behalf of the bank; who is authorized to create a social media account for the bank; and who should be the point person when something needs to be reported or responded to.

Selecting a manager or management team to manage the bank's social media efforts (if the bank is participating) can be a daunting task, but it is important to have in place before initiating social media. Having a detailed plan of who is managing what aspects of social media will help keep things calm and organized when an urgent need arises. It will also provide employees with an understanding and process of who is "in charge" of social media on behalf of the bank.

3. Employee Responsibilities
One of the most commonly discussed issues regarding social media is whether or not employees should be allowed to access social media channels and networks during the workday. There are many arguments that can be made by either side. While there are many perks to banks for allowing employee access to social media within the workplace, there are some definite risks as well. Allowing employees to have access to social media while at work could result in loss of productivity. It could also put the bank in danger, especially if employees disclose confidential information or if they leave comments that the bank is held liable for. Therefore, it is essential that each employee understands his or her responsibilities as it relates to social media and the bank.

This section of the policy should clearly outline the employee's accountability—particularly that he/she is responsible for his/her own actions. It would also be advantageous to offer training to all employees who want to learn how to properly use social media in the workplace. This training is especially important for those who are expected to be the bank's brand ambassadors.

4. Proprietary and Confidential Information
Social media prides itself on offering the ability to share content with others in a manner that is easy and seamless. Twitter introduced the "retweet." Facebook incorporated a "like" button. Google implemented the +1 button. There are also multiple sharing tools with almost any online content across the Web via applications like "ShareThis" and "AddThis."

However, with all of that said, it is still important to give credit for the origin of content where credit is due. Most of the social media channels have already planned for this. For instance the "retweet" shows the post from the original individual. Share tools usually include a link to the original article. But to be safe, employees that post information on social media platforms on behalf of the bank *should be trained to recognize and respect when copyright laws comes into play.*

On a related note, it is important for each employee to understand the importance of *not* posting confidential or proprietary information about the bank's customers, products, internal procedures or other employees. Within this section of the policy, it would be natural to reference the bank's other internal documents that the employees

have read and agreed to instead of reinventing the wheel—for instance, the employee handbook, code of conduct, business ethics, etc., and make sure they know that all are applicable to their social media participation.

5. Employee Disclaimers

If your bank is already participating in social media, you probably have already started to recognize some of your bank's "brand ambassadors"—that is, those individuals who live and breathe the brand of the bank and who are eager to tout the bank's message and point-of-difference via online media. These individuals can be an incredible asset, but it is important that the social community (regardless of channel/network) recognizes the difference between an employee's social media interactions and those of the bank itself. Therefore, the policy should address how to correctly use employee disclaimers.

These "brand ambassadors" as well as any other employee speaking on behalf of the bank should inform social media communities that their comments are personal opinions and do not necessarily reflect the views of the organization. Naturally, this isn't applicable to your employees' personal social media profiles, unless of course, they are posting information about or related to the bank in any way. When communicating this information in the policy, be sure to explain that this approach is to protect the organization while preserving the employee's right and ability to express personal opinions.

6. Privacy Expectations

It is important to set the expectations with respect to employee privacy. In this regard, the bank needs to articulate the organization's right to do the following things: 1. Inspect social media-based records from company equipment on company time. 2. Monitor social interactions in real time. 3. Monitor social interactions in stored files (cache, history, etc.).

When writing this section of the policy, it might be helpful to consult with your IT and legal departments to review federal, state and local laws as they pertain to privacy. This section of the policy will provide protection against any claims of breach of privacy that may occur.

7. Violation Consequences

This section of the policy indicates that violations of the social media policy could lead to disciplinary action and/or termination. In order for employees to take the policy seriously, this section is vital. When writing this section, you will want to make sure to avoid overly broad language and clearly explain the disciplinary actions that could be taken should an employee disobey.

With that said, there have been community banks that have been ridiculed in the media by placing overly strict guidelines on their employees' *personal use* of social media. There is a thin line about what you can and cannot require from your employees regarding their personal use

of social media. Therefore, it would be advantageous to consult with an attorney before taking any disciplinary action against an employee in such a case, while keeping the rules of the National Labor Relations Act in mind. This act prohibits employers from punishing employees for discussing work conditions.

It is important for you to know what is being said online about your bank brand.

8. Respect (Best Practices)

Over the past two years, banks have been working especially hard to gain or regain their customers' confidence and trust. Social media provides banks with an unparalleled opportunity to be honest and straightforward with their customers. It provides an environment where transparency and authentic communication is appreciated and well-received. Therefore, it is vital for the social media managers, brand ambassadors and any employee to be properly trained on how to be respectful when speaking about or on behalf of the bank.

With that said, respect is completely subjective. To ask employees to "respect" the bank's online brand and reputation isn't definitive enough for them to walk away with a clear understanding. Therefore, within this section of the policy, clarify what your expectations are regarding respect for the brand/organization, respect for employees, respect for customers, respectful language, etc. If this language already exists in another internal document, then reference that document here.

MONROE BANK & TRUST
SOCIAL MEDIA POLICY

Purpose

Monroe Bank & Trust (MBT) recognizes that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs, wikis and interviews and/or communications with news media. However, employees' use of social media can pose risks to MBT's confidential and proprietary information, reputation and brands, and can jeopardize the company's compliance with business rules and laws.

To minimize these business and legal risks, to avoid loss of productivity and distraction from employees' job performance and to ensure that the company's IT resources and communications systems are used only for appropriate business purposes, MBT expects its employees to adhere to the following guidelines and rules regarding use of social media.

Apart from personal use of social media in accordance with this policy, MBT encourages its employees to participate responsibly in these media as a means of generating interest in MBT's products and services and creating business opportunities.

Compliance With Related Policies and Agreements

All of MBT's other policies that might apply to use of social media remain in full force and effect. Employees should always adhere to them when using social media. In particular, the following policies and/or employee obligations should be kept in mind:

- The Code of Ethics as contained in the Ethics Policy
- The Privacy Policy
- All the Policies found in the Technology Policy Manual
- All matters covered by the MBT Employee Handbook

In addition, social media should never be used in a way that:

- Defames or disparages MBT or its affiliates, officers, employees, customers, clients, business partners, suppliers, vendors or other stakeholders.
- Harasses other employees in any way.
- Circumvents policies prohibiting unlawful discrimination against current employees or applicants for employment.

Employees should also never provide references for stakeholders on social or professional networking sites, as such references, positive and negative, can be attributed to MBT and create legal liability for yourself and MBT (such as interference with prospective business contracts and allegations of wrongful termination).

Employees who violate MBT policies will be subject to discipline, up to and including termination of employment.

9. Date/Employee Signature

Social media laws and regulations are constantly changing. Keep in mind that the social media policy is proactive instead of reactive. It is meant to help you during your regulatory audits, employee complaints, public relations issues, and so forth, as they come about. Therefore, it would be advantageous to update your policy regularly—at least quarterly.

To stay organized, place the date somewhere on the policy indicating when it was written or updated for auditing and/or legal purposes. Also, have each employee read and sign the policy, just as they do for the employee handbook, code of conduct and related items.

10. Addendums

Because social media affects several departments, it is a good idea to include addendums to your social media policy specific to their departmental needs. For instance, the human resources department has the ability to use social media for reasons of its own. Therefore, what is the bank's policy on permitting the use of social media when evaluating job candidates? What type of information can be gathered, documented and considered when looking to hire someone?

HR is just one department that might need an addendum. There may be others within your own organization that would benefit from specific guidelines as it relates to their responsibilities. The compliance, risk and marketing departments, for example, might benefit from having an addendum that addresses the regulations and compliance guidelines as it pertains to information being posted on the bank's social media channels. Such regulations are constantly changing, and therefore having an addendum would make it easier to update the guidelines on an as-needed basis. The intent is to avoid making each employee read through the entire policy when searching for a section that is relevant to his/her specific area of interest.

Social media will continue to grow and further dominate the way consumers interact with each other as well as with the institutions they do business with. For marketers, it is pertinent to know how customers are finding out about your bank and interacting with your services. It is even more important to know what is being said online about your brand. And once you find out, do you have a policy in place concerning how to handle certain comments and reactions?

Regardless of whether or not your bank is participating with social media, a policy is essential in providing clear guidance to your employees and in protecting the bank. ∎
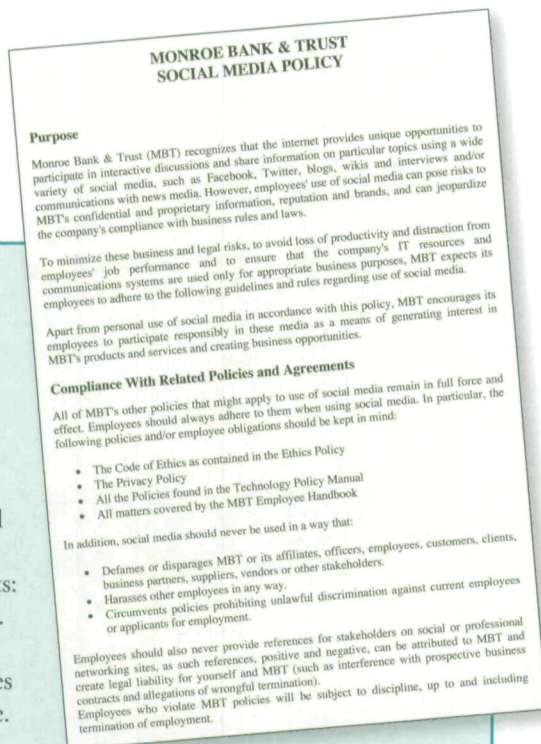
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