Disclosure Best Practices Toolkit

Introduction

This document is a draft series of checklists to help companies, their employees, and their agencies learn the appropriate and transparent ways to interact with blogs, bloggers, and the people who interact with them.

We believe in the principles of transparency and openness, and this document is a way of making this real on the inside. Our goal is not to create or propose new industry standards or rules. These checklists are open source training tools designed to help educate the hundreds or thousands of employees in any large corporation the appropriate ways to interact with the social media community.

Scenarios Addressed

1. Disclosure of Identity
2. Personal/Unofficial Blogging and Outreach
3. Blogger Relations
4. Compensation and Incentives
5. Agency and Contractor Disclosure
6. Creative Flexibility

This is an Open Source Document

- This is a living document that will continually change.
- This document will continue to evolve with community feedback and participation.
- Share and change this document as much as you like. It is licensed under a Creative Commons Attribution 3.0 Unported License. Please attribute the Social Media Business Council and link to www.socialmedia.org/disclosure.

How to Use this Toolkit

1. Discuss these model policies with everyone involved in social media:
   marketing, communications, legal, HR, sales, customer service, etc.
2. This document supports existing company policies and is not intended to supersede them.
   Customize them to fit your organization's specific needs and operations.
3. Create a training program to share them company-wide.
4. Share them with your agencies, consultants, and contractors.
5. Post your version to our library to help other companies develop policies.

Frequently Asked Questions

1. **What is the purpose of these guidelines?**
- Create a training tool
- Set a baseline of best practices
- Educate companies that are new to this
- Simplify a complicated topic

2. **Are these rules mandatory or binding?**
No, these are best practices for developing your own internal guidelines. The Social Media Business Council is not a trade association or standards body, so we don't have the mandate or authority to set binding rules. We help companies learn from each other and develop best practice recommendations as a community.

3. **Are you regulating blogs or blogging?**
No, not at all. This is an open source training tool for companies that want to learn the right way to interact with blogs. We are teaching and sharing our experiences.

4. **What is the Social Media Business Council's role?**
We are a volunteer group of companies that share insights and experiences with each other. We drafted this document to make it easier to share our learning with everyone.

5. **How do I use these guidelines?**
- Discuss these model policies with everyone involved in social media:
  marketing, communications, legal, HR, sales, customer service, etc.
- This document supports existing company policies and is not intended to supersede them. Customize them to fit your organization's specific needs and operations.
- Create a training program to share them company-wide.
- Share them with your agencies, consultants, and contractors.
- Post your version to our library to help other companies develop policies.

Published by the Social Media Business Council, www.socialmedia.org
Issued under Creative Commons Attribution 3.0 Unported License

Page 2 of 9

6. Are the disclosure guidelines just for blogs?

No, these guidelines are useful any place where your employees are commenting or participating in a conversation. They are useful for all social media, and in particular any time there is a question of personal vs. corporate voice/role.

7. Are you accepting feedback?

Yes. We welcome and invite all interested parties to add their opinion and contribute toward improving the guidelines.

8. Can I adapt these checklists for my own organization's needs?

Yes. The Disclosure Guidelines are licensed under the Creative Commons Attribution Non-Commercial License. Visit http://creativecommons.org/licenses/by-nd/3.0 to view a copy of this license.

Disclosure Best Practices Checklist 1:
Disclosure of Identity

Focus: Best practices for how employees and agencies acting as official corporate representatives disclose their identity to bloggers and on blogs.

When communicating with blogs or bloggers on behalf of my company or on topics related to the business of my company, I will:

1. Disclose who I am, who I work for, and any other relevant affiliations from the very first encounter.

2. Disclose any business/client relationship if I am communicating on behalf of a third party.

3. Provide a means of communicating with me.

4. Comply with all laws and regulations regarding disclosure of identity.

5. We will inform employees, agencies, and advocates that we have a formal relationship of these disclosure policies and take action quickly to correct problems where possible.

6. Pseudonyms:
   (Option A) Never use a false or obscured identity or pseudonym.
   (Option B) If aliases or role accounts are used for employee privacy, security, or other business reasons, these identities will clearly indicate the organization I represent and provide means for two-way communications with that alias.

7. "We Didn't Know"
   Clearly disclose our involvement on all blogs produced by the company or our agencies.

Published by the Social Media Business Council, www.socialmedia.org
Issued under Creative Commons Attribution 3.0 Unported License

Page 4 of 9

Disclosure Best Practices Checklist 2:
Personal/Unofficial Blogging and Outreach

Focus: Best practices for employees and employers related to personal blogs and personal social media participation that talk about company-related issues. These are intended to supplement existing employee policies.

For personal blogs or social media interactions:

1. If employees write anything related to the business of their employer on personal pages, posts, and comments, they will clearly identify their business affiliation.

2. The manner of disclosure can be flexible as long as it is clear to the average reader, directly connected to the relevant post, or provides a means of communicating further (Example disclosure methods could include: usernames that include the company name, link to bio or about me page, or statement in the post itself "I work for __<company>___ and this is my personal opinion.")

3. Employees will specifically clarify which posts/comments are their own opinions vs. official corporate statements.

4. Writing which does not mention work-related topics does not need to mention the employment relationship.

5. If employees blog anonymously they should not discuss matters related to the business of their employer. If employer-related topics are mentioned, they should disclose their affiliation with the company.

Disclosure Best Practices Checklist 3:
Blogger Relations

Focus: Best practices for how businesses interact with external blogs and bloggers.

When communicating with blogs or bloggers on behalf of my company, I will:

1. Disclose who I am, who I work for and any other relevant affiliations from the very first encounter.

2. Proactively ask bloggers to be transparent about their relationship and communications with me.

3. Always be truthful.

4. Never ask someone else to deceive bloggers for me.

5. Never ask bloggers to write a fake endorsement or something they do not believe.

6. Never use off-topic comment for self-promotional intent.

7. Never take action contrary to the specific boundaries, terms and conditions, and community guidelines set by each blog.

8. Not use services or technologies for mass-posting comments.

9. Use extreme care when communicating with minors or blogs intended to be read by minors.

10. Comply with all laws and regulations regarding disclosure of identity.

11. Make it clear to our employees and agencies that these rules apply to them.

Disclosure Best Practices Checklist 4:
Compensation and Incentives

Focus: Best practices when providing incentives to bloggers.

When providing bloggers with any form of compensation such as rewards, incentives, promotional items, gifts, samples, or review items, I will be completely transparent by:

1. **Setting formal policies on using incentives with bloggers for our staff and agencies.**
    a. **Review products can be returned at their own discretion.**
    b. **Review products must be returned or paid for at fair market value.**
    c. **Items of nominal value (low cost product samples or consumables) may be kept.**
    d. **Review products should be returned, paid for, or retained by the blogger based on standards for the specific industry. (Examples: restaurant reviewers pay for the meal, tech reviewers return the product, hotels provide complimentary stays.)**
2. **Communicating these policies clearly to the blogger in advance, and asking that they do the same in any post that may result.**
3. **Encouraging bloggers to disclose the source of any compensation directly in any post they write about us.**
4. **If you choose to use paid posts or reviews, you must insure that it is clearly disclosed in the specific post that it is an advertisement.**
5. **Not manipulating advertising, link-trading, or affiliate programs to impact blogger income or traffic.**
6. **Understanding that if I send bloggers products for review, they are not obligated to comment on them at all, and they are free to write a positive, negative, or neutral comment.**

Disclosure Best Practices Checklist 5:
Agency and Contractor Disclosure

Focus: Best practices for vendors, agencies, and subcontractors that act on behalf of a company.

When using external agencies or personnel to communicate on our behalf, I will:

1. **Require my agency to disclose its relationship with my company when it conducts blogger relations.**
2. **Require my agency to be truthful and never knowingly deceive bloggers.**
3. **Publicly acknowledge when my agency and/or related parties act contrary to these policies, and quickly take corrective action where possible.**
4. **Require agencies and agency personnel to meet or exceed our internal disclosure requirements.**
5. **Require agencies to enforce these requirements on their subcontractors.**
6. **Always discuss and secure formal agreement on these practices before entering into a business relationship with an agency involved in social media.**

Disclosure Best Practices Checklist 6:
Creative Flexibility

Focus: Best practices for artistic/entertainment situations where temporarily obscuring the sponsor of a site is necessary and appropriate.

Disclosure may be delayed temporarily to allow for creative freedom if it meets all of the following criteria:

1. **The blog is clearly part of a game, mystery, or other project that is intended for entertainment purposes, not to enable corporate representatives to pose as consumers. It must be apparent to the average reader that there is a business/marketing purpose to the project**
2. **The sponsor will be eventually revealed within a reasonable period of time.**

Example: Creating blogs to promote a movie.

- **CORRECT: A pretend blog where someone writes that they may have discovered aliens in their house to promote a science fiction movie.**
- **CORRECT: A blog is "written" by a character if it's apparent the character is fictional.**
- **CORRECT: Clues in a mystery or alternate-reality game.**
- **INCORRECT: A fake consumer blog where the "author" writes: "I'd love to go see this movie."**