



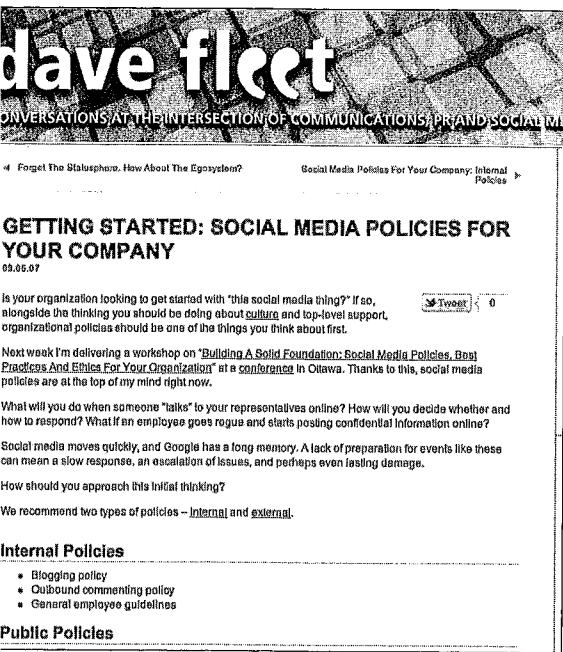
## Remedy Your Fears with Sound Policy

*If we've managed to inspire you to start using social media, but you're still unsure, this is your chapter. Hopefully you can see that although social media might be a little unpredictable at times, it is possible to keep some semblance of sanity and normality while following the company's mission and messaging standards.*

*We'll admit, social media might sound like some big, Wild West free-for-all. But that does not mean your company needs to abandon its identity, history, traditions, practices, or procedures. Incorporating social media doesn't mean you no longer have to follow the law, government regulations, or sound business practices. There are places on the Internet where it is wild, but that's not where your company wants to (or should) be. Some people online might take certain liberties with language, ideas, and degrees of nakedness, but that's not the kind of thing your company wants to participate in.*

This chapter is all about establishing a sound, easy-to-follow social media policy that lets your employees use social media to reach your customers, but, at the same time, keeps them from engaging in inappropriate behavior, visiting inappropriate sites, and not representing your company or brand in the best possible light.

Many companies have created a social media policy to deal with how they will respond to customers via social media, what kinds of communicating they will do in social media, and which employees are allowed to use it and what they are allowed to do and not do. These companies include the BBC, Dell, the *Washington Post*, the New Zealand State Services Commission, the U.S. Air Force, the U.S. Navy, and the International Federation of Red Cross and Red Crescent Societies.<sup>1</sup> Several social media practitioners, such as Dave Fleet, document these policies and write frequently about them (see Figure 12.1).



**Figure 12.1** Social media professional Dave Fleet writes about the need for and creation of corporate social media policies. They're important tools that can save you a lot of time and headaches in the future.

Obviously, these companies have recognized the need for a social media policy. They are embracing the opportunities the social web offers companies. These organizations recognize the power of allowing employees the freedom to interact with customers but also give the employees a framework to guide those interactions.

## Why Do We Need a Social Media Policy?

In short, you need a social media policy to protect yourself, regardless of your company's size or how comfortable you are with employees operating as extensions of your brand. Chances are, you already have other policies that guide employee behavior. There are policies about sick days and personal days, workplace attire, and workplace safety. There also needs to be a policy about how your company communicates with the outside world.

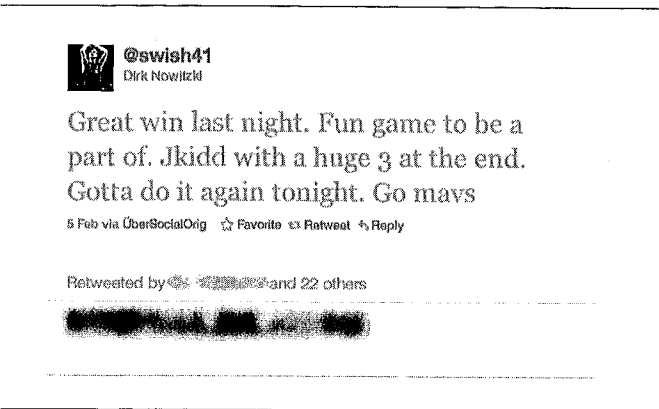
Maybe your policy is that no one outside the social media practitioners may use social networking on behalf of the company (see Chapter 14, "This Is NOT a Sandbox. It's a Business," for more on who should be involved in your social media efforts). Maybe your policy requires that everyone can communicate on behalf of the company using social media, but needs to go through a special certification and training course first. And maybe you want to take the Zappos approach to social media and let everyone in the company talk about whatever is on their mind. If you work for a small company and you can trust everyone to do and say the right thing, that's great. But if you work for a larger company whose employees don't know each other, you can run into all kinds of problems where different messages and answers get sent out to customers, internal discussions are taken out into the general stream, and people may even inadvertently send out information they weren't supposed to.

In November 2010, National Hockey League general managers (GMs) were feeling their way around Twitter and Facebook, figuring out what they wanted their players to be able to send out to their fans and followers. During a GM meeting, they were discussing their concerns about what to do with Twitter and applying policies around the social network because their players were tweeting inappropriate comments or even giving away team information. Washington Capitals' GM George McPhee told *USA Today* that a couple of years before, one of their players tweeted that he wasn't going to dress that night, which gave their opponent the jump on knowing the Capitals' lineup.

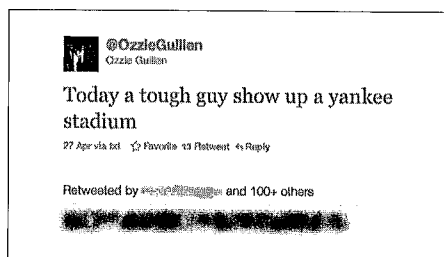
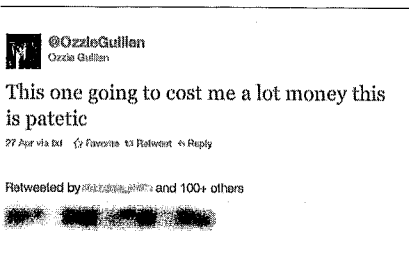
Although knowing whether someone is playing in a game that night might not seem like such a big deal, sending out proprietary business information that's worth millions or billions of dollars is. Although a spat between two players that gets aired right before game time might not seem so important, an inappropriate or outrageous tweet from someone's personal account could result in damage to the employer's brand, especially if that person is closely associated with that brand.

The NHL is still struggling with its own social media policy, while other professional sports leagues deal with it, too. With specific focus on Twitter, the National Basketball Association (NBA) doesn't allow players to tweet during a game (see Figure 12.2 for the kinds of tweets NBA players are likely to send out after a game), the National Football League (NFL) requires players to stop tweeting 90 minutes

before game time, and Major League Baseball bars tweeting by players and managers 30 minutes before a game starts. This year, Chicago White Sox manager Ozzie Guillen was suspended after he tweeted an angry response to a bad call during a game against the New York Yankees on April 27 (see Figure 12.3).



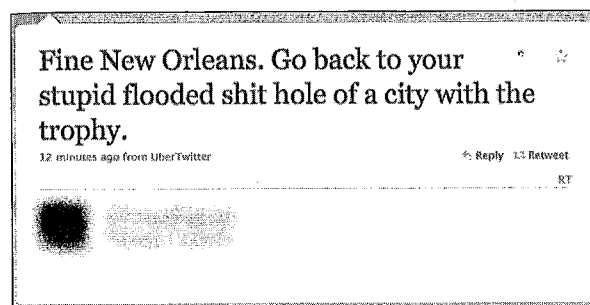
**Figure 12.2** Dirk Nowitzki of the Dallas Mavericks sends out tweets before and after most games. The NBA doesn't allow players to tweet during games.



**Figure 12.3** Chicago White Sox manager Ozzie Guillen was suspended for two games after he tweeted during a game against the New York Yankees on April 27. Major League Baseball bars tweeting by players and managers 30 minutes before a game starts.

Right after Super Bowl XLIV (the New Orleans Saints beat the Indianapolis Colts 31 to 17), one Indianapolis PR “professional” sent out a rather denigrating tweet about New Orleans and their “flooded shit hole of a city” (see Figure 12.4). The uproar that followed over the next 48 hours nearly cost this person her job and helped contribute to a major exodus of clients from her agency. The day after the tweet in question, her employer fielded phone calls from angry clients and angry tweets from Indianapolis and New Orleans demanding that the woman be fired. She blogged and tweeted an apology to the people of New Orleans and

Indianapolis, but her original tweet and the resulting backlash reinforced for a lot of companies why they needed a social media policy at all. Unfortunately, for some companies, this uproar might have stopped them from joining the world of social media in the first place.



**Figure 12.4** One Indianapolis PR professional angered a lot of people when she sent an insulting tweet after the New Orleans Saints won Super Bowl XLIV. The fallout caused her and her employer a lot of grief and reminded people that you're always “on” when you're on social media, even on a personal account.

We're not advocating that you avoid using social media because one rogue employee decides to tweet out something hateful and nasty. Rather, create a social media policy that establishes guidelines for how employees can use and enjoy social media. And spell out the consequences for moving beyond those guidelines.

Several companies have already begun spelling out what they expect of their employees and how they should view their online communications. The United Kingdom government's “Twitter Strategy for Government Departments” says “*while tweets may occasionally be ‘fun,’ we should ensure we can defend their relation back to Our objectives.*”<sup>2</sup> SHIFT Communications, a PR firm, says their employees shall “*(p)ost meaningful, respectful comments—in other words, please, no spam and no remarks that are off-topic or offensive.*”<sup>3</sup> And the *Washington Post's* social media policy reminds its writers that by being journalists, they “*relinquish some of the personal privileges of private citizens. Post journalists must recognize that any content associated with them in an online social network is, for practical purposes, the equivalent of what appears beneath their bylines in the newspaper or on our website.*”<sup>4</sup>

Similarly, the *Post* takes one of the best approaches to making sure its social media strategy lines up with its day-to-day mission of being a top-notch newspaper.

“When using these networks, nothing we do must call into question the impartiality of our news judgment. We never abandon the guidelines that govern the separation of news from opinion, the importance of fact and

objectivity, the appropriate use of language and tone, and other hallmarks of our brand of journalism.”<sup>5</sup>

A social media policy like this might have helped the Indianapolis PR professional understand what kind of effect an inflammatory tweet like hers would have had, even if she were tweeting as a private citizen. Because her name had already been linked to her employer’s—she even had it in her Twitter bio—the policy would have spelled out what was considered appropriate and inappropriate, as well as what happens when people violate the policy.

Although none of the organizations we’ve mentioned here discuss what will happen to people who break any of the guidelines, Dell is a little more specific in what will happen if people violate its policies.

“You will be held accountable for the information You share in online activities. Be careful what You share, publish, post, or otherwise disclose. You are personally responsible for what You share and should remember that anything You post may be public for an indefinite period of time (even if You attempt to modify or delete). Try to ensure Your online communications reflect Dell’s brand attributes of openness, responsiveness, integrity and optimism.”

Dell didn’t specify what will happen, but its policy does remind employees that they themselves, and not Dell, are personally responsible for what they publish. They also remind people that their messages are public for an indefinite period of time.

## The Question of Ownership

Who owns your content? That is, if an employee sends a tweet or writes a blog post for your company on company accounts, who owns it? Your company does. This is true of any work that any employee generates, whether it’s an engineering technical manual for your latest widget, a brochure about why every household needs the widget, and even the press releases that are sent out announcing the widget. Because social media is just one more written channel in this instance, anything created on the company’s social media channels is also the property of the company.

This also means that the company blog posts your employees write, the company tweets they send, and the websites they design are all owned by the company. Their names may be listed as authors, but that doesn’t mean the content belongs to the employee. However, they should be allowed to use these posts and examples as part of their professional portfolios, although they wouldn’t be able to use that material for another company.

In a similar vein, some companies have taken to deleting old blog posts whenever the author leaves the company. We recommend against doing this for a number of reasons:

- It seems petty, like you’re not willing to admit the author worked there or you’re trying to erase all traces of her existence.
- The search engines already know the information is there, and you’re getting a lot of benefit by having this content on your website or blog. Deleting the content eliminates any search engine benefits you were getting.
- Their posts contain valuable information that is still useful. Presumably you hired this person because he is smart. Just because he is no longer there doesn’t mean the information is now invalid or not worthy of your server space.

## What Can Employees Do at Home?

Your company’s comfort with employees having permission and access to social media gets a little stickier if you allow your employees to associate their place of employment with their personal social media accounts or allow them to communicate through them for work purposes. Of course, even if your company doesn’t participate in social media, that doesn’t mean your employees aren’t using it at home after work hours, and you certainly can’t—in most cases—tell them what they can or cannot post on their personal accounts.

But if you communicate openly with your employees that they are allowed to utilize social media accounts and acknowledge their place of employment or communicate through them for work purposes, then you have the right to apply some company policies and expectations for their behavior there. In exchange for the privilege of talking openly as an employee of the company, the employee must surrender his full freedoms to post whatever he wants. That type of approach works well with many existing policies we’ve written and reviewed.

Depending on the type of industry and its various regulatory or governing bodies, however, a company must be aware that the courts are often ruling on behalf of the employee. In fact, one woman, Dawnmarie Souza, successfully won a suit filed on her behalf by the National Labor Relations Board (NLRB) against ambulance company American Medical Response of Connecticut, Inc. Souza was fired for posting critical comments on Facebook about her boss. The company had an Internet policy that prevented workers from disparaging the company or its supervisors in a blog or other social network. The judgment led the company to agree to change

that policy, as well as another policy that prohibited its employees from depicting the company online at all.<sup>6</sup> The NLRB said that both of these policies violated legal protections that allow workers to talk about their salary, working hours, and working conditions with co-workers.

However, this does not mean that employees can discuss private or secret information, such as patients' private information, proprietary company information, or trade secrets. Even if you do not have a corporate social media presence and policy, it's at least a good idea to address these issues in the company handbook. This brings to mind a valid point. If you have a company handbook, ethics policy, or another document that governs employee behavior, often the simple way to add a social media policy is to review those documents and add the words "and online" in strategic places. Communicating on social media channels is no different than communicating over the telephone or talking to someone in person. If you're in a highly regulated industry and have a policy that employees are not allowed to divulge private client information to anyone, then they're not allowed to do that on- or offline. The Internet does not make the rules go away. Just clarify the fact that the policies you already have apply in the online world as well, and you'll probably be just as risk-averse as you were before social media was a factor.

## Telecommuting Is Not the Same as Personal Networking

It's worth mentioning that an employee who works from home and uses social media as part of his job responsibilities should be covered under your social media policy. This is completely different from an employee who communicates from home during personal time. Your social media policy can cover what employees say or do during their work hours, even when they're working at home or another off-site location.

It's up to you whether you allow people to update their personal social networks from work, during work hours, even if they're using personal phones on their own time to do so. We generally favor that employees who get breaks and lunches be allowed to update their networks, whether it's from their workstations or their smartphones.

## What Should a Social Media Policy Include

The best way to tell you what social media policies should include is to tell you what they should *not* include. This is not the place to start your employee code of conduct or employee manual. Don't start including an entire code of conduct that each employee is supposed to follow. You should already have one of those. If you don't hire an HR consultant to write one for you. Similarly, if any policies or codes

of conduct already exist elsewhere, and you still feel the need to explain a specific social media policy, then simply reference the existing policies in your new one.

Now, the hard part: What should your policy contain? There are two basic ways you can approach this, and we favor one over the other. One option is to write the entire policy up front, dealing with as many contingencies as possible *as generally as possible*. Don't write a rule or process for every single social network, every possible type of interaction you have with customers, and the types of things you are allowed or not allowed to say. Rather, leave it as general as possible, referring to "social media" and understand that it means any and all social networks and blogging.

However, keep in mind that this approach is going to take a very long time because you're going to have people who want the policy to cover every eventuality for every possible usage—both current and future—of social media. The problem is that typically people who undertake this kind of approach (1) don't know very much about social media, so they get bogged down in trying to figure out how it works and create rules that don't even apply, and (2) don't really understand how their co-workers are going to use social media, so they may end up creating rules that will never apply or will completely run counter to the reason you need to be on social media in the first place.

The best practice is to create an overall code of conduct that tells employees what sorts of behavior you expect from them and what kinds of things they are allowed to say and share and what kinds of things they need to keep secret or not say. Next, create different policies (or sections) that deal with different facets of social networking.

Remember Erik's friend who works at a university where they've been debating using social media for six months? This is the part that's taking so long; they haven't even created a single account on a single network, but they've managed to spend six months creating rules on how they're going to use it.

In May 2010, Jason was interviewed by *Inc. Magazine* about some items to include when creating a general social media policy. Even though he recommends that you create individual policies that deal with major social networking tools, like Facebook, Twitter, LinkedIn, and blogging, the policy should evolve based on need and use, rather than remain a static set of arbitrary rules that your committee will debate and argue over for months that never actually come into play. You'll find that the three-week argument about Yandex, the Russian search engine, will prove to be moot, as no one in your company will ever use it.

The best approach is to create your overall code of online conduct, and then add new sections or specific policies as the need arises. Base your policies on need and actual usage; don't write them well in advance to cover that one instance that might or might not ever happen. Remember, if you do it right, your code of online conduct should cover the overall best practices of online communication without getting into the fine details of each and every network. This is helpful because you're

trying to govern employee communications, not the technological aspects of a certain platform.

Finally, as the need arises, create separate policies (or sections) on both the personal and company usage of

- Blogs and blog commenting
- Facebook
- Twitter
- LinkedIn
- YouTube

But don't spend a lot of time focusing on the fine details about how each tool should work. They change frequently, and you would have to have someone who is constantly updating each tool. Rather, they should focus on best practices and general guidelines, just like the online code of conduct. An example of a good policy statement might be the following:

- When posting real-time updates about company news, be sure the news has been announced and permission to post has been granted by the communications department.

An example of what we wouldn't want you to waste time writing is

- Do not tag the company in personal Facebook photos.

Instead, write a general policy such as, "When posting images or information of a personal nature, please refrain from incorporating the company into the messaging."

Your policies do need to include information about how, or even whether, employees may represent the company on their personal networks. For example, even if it's with the best of intentions, if an employee of a large fast-food chain responded to allegations of animal cruelty or poor hygiene, his response might be seen as an official statement on behalf of the entire corporation, even though he's the assistant fry cook at the Duluth, Minnesota, restaurant.

Your social media policy also needs to

- **Be positive and proscriptive.** Focus on what employees can do, instead of being negative and restrictive, detailing everything employees can't do. That doesn't mean you can't have anything negative in it, but the overall tone needs to be positive.
- **Discuss consequences for violations.** People have been fired for things they said on social media channels, regardless of how ill-advised the firing might have been. People have been fired for writing about their

personal interests and hobbies outside of work, which is none of their employers' concern. Similarly, people have been fired for sharing information they shouldn't have, which is their employer's concern. In nearly every case, these firings have been a complete surprise to the people who were fired. Your social media policy needs to avoid any confusion and surprise by stating up front what will happen if policies are violated.

- **Remind people to be authentic.** We've talked about authenticity throughout this book. Employees should not, even if they are trying to help the company, hide their identity, their name, or their relationship. They need to state who they are and where they work. People should also state that their messages are their own viewpoints and not those of their employer.
- **Encourage people to be on their best behavior.** You know how you would react if an employee made racist or sexist comments in the workplace. You should apply those same standards to their online behavior as well. Although your employee doesn't speak for the company, the association with your company can make you look bad if your employees are making racist, sexist, or other disparaging or mean comments online. Remember the Indianapolis PR pro who made the statement about New Orleans after Super Bowl XLIV? Although she was communicating on her own time with her own Twitter account, plenty of clients, as well as members of the general public, saw her employer whenever they saw her. Encourage employees to use their best judgment.
- **Remind people to do their jobs.** Communicating with customers is great, but if it's not in the person's primary job description, then she's not getting her work done. For example, answering customer technical questions and complaints is important, but the PR person should not spend the bulk of her time doing it. She either needs to turn it over to the customer service department, or she needs to stop doing it. (And if there isn't anyone who can handle technical questions and complaints online, then get one. This is a symptom of a bigger problem.)
- **Remind people to maintain privacy.** Even if you don't work in an industry that has strict privacy rules—Health Insurance Portability and Accountability Act (HIPAA), attorney-client privilege, investor information for publicly traded companies—you should honor the privacy of your customers or the regulatory requirements. Never discuss specific customers, never share their problems or questions, and definitely don't link to them unless you have their permission.

- **Spell out who is responsible for making final decisions about issues that have not been covered.** This needs to be someone who is already familiar with social media and understands the marketing and customer communication very well. That means it either needs to be someone in one of the four departments we've already discussed—marketing, PR, sales, or customer service—or someone who is in charge of the social media department.

## What Should You Do About Privileged Information and Avoiding Giving Advice?

The fear of violating privileged information is the one reason most businesses, especially regulated ones, stay out of social media. Your social media policy needs to address what is considered privileged information or professional advice (something doctors and lawyers can't just give willy-nilly), and what things you can and cannot discuss on a social network. For example:

- A customer complains on a hospital's Facebook page about his treatment or bill. It is *not* acceptable to address the matter on Facebook, the same way a cable TV company might because a response essentially confirms that the person was a patient. Instead, write a response that says, "I'm sorry, we can't answer any questions on Facebook because of privacy. I realize it's inconvenient, but could you call our main number and explain your situation? They will be able to connect you with the right department."
- Someone writes a comment to a Facebook page with a legal or medical problem. In about 200 words, they ask you a basic question, and you are 99% certain you could solve her problem in about 200 words in return. The problem is, your professional ethics forbids this kind of behavior. You need to honor that and say, "I'm sorry, I'm not able to answer that question directly. I don't have enough information to give you the best answer, and don't want to give you the wrong answer. You could make an appointment to see me, and I can help you."
- A relative of a patient or client sends you a message on Facebook mail, asking about his relative's case. This one is a no-brainer: You can't share any information over the phone (unless you've been given specific permission from the patient/client) and definitely not by email, Facebook, Twitter, blog posts, sky writing, the Pony Express, or interpretive dance. It does not matter what channel, you just can't do it. A simple, "I'm sorry, I'm not able to discuss that," will do.

Now, one thing you *can* do is discuss hypothetical situations as educational blog posts, for example. We once worked together for a legal client who wanted help with his blogging. They wrote blog posts that were common questions people might search for, thus helping this attorney to be viewed as an expert by his potential clients. Many of these posts were answers to frequently asked questions, and even similar to cases he handled on a regular basis. But they were always written as generically as possible. They always included a disclaimer that this was not legal advice, and that if the reader needed further information, he or she should contact an attorney.

With this kind of social media, you can never name names or even discuss specific situations, but the lessons people could learn can be valuable. Just make sure to remove any identifying information, and you can avoid violating any kind of privilege. Of course, finding the best people to handle this kind of responsibility is something you need to take seriously.

## Trust Employees, but Not Everyone Should Speak for the Company

We know, we know. We've said several times before that you need to trust your employees and that if you don't have any employees you can trust, you have a hiring and management problem. We said you need to be able to trust your employees to talk with your customers because they will be the best evangelists for your company and can put a human face on your corporation.

But there will be some employees who, let's face it, just shouldn't speak to the public. They might be good at their job, can manage the internal processes extremely well, but when it comes to letting them be the face of your company, they are at the very bottom of the list of people who should be trusted with this responsibility. Some hard questions are likely to come up, like "Can I help out with the Facebook promotion?" or "Why can't I be on the social media team?" That means you'll have to have some difficult conversations with these people. If this is the case, this might also be a good time to consider an internal social media certification program or limiting social media to certain departments or job descriptions.

## Who Should Enforce It?

Enforcing a social media policy is going to be left up to two people: the person who is in charge of your social media efforts and your legal department or compliance representative, or both. In fact, this is where your legal and compliance departments are going to become important. After all, they understand what it's going to take to

keep your company out of trouble and its executives out of jail. So they're the ones who will know better than anyone whether a tweet violates privilege or a blog post is going to reveal proprietary or sensitive information.

People might think it's rather self-explanatory and easy to figure out. Remember the Washington Capitals' hockey player who tweeted that he wasn't going to dress for a playoff game that night? Although it may seem rather innocuous and a great way to keep fans involved in the team's goings-on, it also accidentally revealed some valuable information to the other team.

Similar things can happen. An innocent tweet from the CEO of your company about a great meeting he had with the CEO of a competing company can possibly signal a merger, a sale of one company to the other, or—in a worst-case scenario—even be a red flag to the FTC that price fixing and collusion is taking place. This is why the social media person needs to work closely with the legal and compliance departments to make sure she understands what is acceptable communication and what is not.

This isn't to say that the lawyers have to review *everything* that is going to be published through social media channels. They don't review every email or listen in on every phone call, so they don't need to review every tweet that goes out. There might be cases when even a two-hour delay is too long, and the effectiveness of a message will be lost. This is why the legal department needs to educate the social media department about what is acceptable communication. This is also where the social media people can educate the lawyers about the importance of customer communication and sounding human. So if any issues come up, especially if they have been spelled out in the policy, then it is up to either the social media head or the legal department to deal with any fallout, along with human resources.

In Ozzie Guillen's case, the Major League Baseball head office and commissioner Bud Selig decided the suspension. In your company's case, you need to appoint someone who will recommend and handle disciplinary measures if your social media policies are violated. However, because social media is still relatively new to you and your company, we don't recommend firing someone for mistakes he makes, especially as your company is still learning to use this properly.

For example, social media agency New Media Strategies was fired by Chrysler after one of its coordinators sent a tweet that was intended for his personal account. After he was fired, and after Chrysler fired New Media Strategies, the social media world was abuzz, not with sympathy for the PR mess Chrysler was in, but for the young man who managed to tank his career in just 140 characters. Many perspectives in the online conversation that followed thought the two organizations overreacted.

Of course, there are scenarios where you would normally have to fire someone anyway, whether it happened on social media or not. Those situations are better decided internally and should be an overall part of your corporate policy, and not just limited to your social media policy.

## Let's Be Clear on the Responsibility

Because social media is a relatively new way for people to communicate and the lines between what is public and what is private are often blurred, social media often gets inaccurately blamed for violations of company policy or mistakes made by its users. In the case of New Media Strategies, some media reports and even blog posts about the incident called upon companies to review whether or not they should use Twitter or hire agencies to tweet for them. This line of thinking shows bias against the medium, not the user.

The coordinator mistakenly sent a personal tweet over a client Twitter channel. This is easily done if you're not familiar with the Twitter application you're using. But the blame for the incident is not appropriately aimed if it's aimed at Twitter. The coordinator's lack of care or understanding of the application he was using is to blame. Twitter had nothing to do with the mistake. It is merely the channel.

Similarly, in the summer of 2011, U.S. Representative Anthony Weiner (D-N.Y.) posted a lewd photograph on Twitter that was intended to be a private message to a female follower. The mistake Weiner made was confusing the syntax of a direct (private) message on the platform with that of a public reply. The media coverage that encircled the Congressman after the incident included several sensational exposés and media indications that Twitter was too risky to use, that politicians shouldn't be using the platform, and that this was another case of social media being bad for us.

What those media outlets did in their coverage was blame the tool, not the craftsman. The only person to blame for Anthony Weiner's misstep was Anthony Weiner. He could have texted the message, emailed it, or printed it off and mailed it in an envelope. None of those channels would have been blamed. But because many media members, and the general public, didn't yet have a comfort level with Twitter as a common communications channel, the chic thing to do was to blame the channel, not the culprit.

If your employees make a mistake on a social network, it does not mean your company should go run and hide from the social network. It means the company should do a better job of educating and empowering its employees to use the networks appropriately.



## What If People Spend Too Much Time on Social Media?

There is a possibility that, appropriate use or not, your employees will spend more time on social media than is necessary. When this happens, their work suffers. This is where the social media director, the person's supervisor, or both (see Chapter 14 for more information on models of social media management) will need to step in and have a discussion with the employee about getting his work done and not letting social media take over his job.

Of course, sometimes this becomes necessary, like if a customer service person takes on all social media complaints and can't answer phone calls. Or a marketing person spends a lot of her time building an online community centered around a particular brand. In some cases, the person's new duties will need to shift and change, *as long as his efforts are producing a positive return for the company.*

But there are times, as with any new tool or process, when it's easy to let this become a distraction and a problem to be dealt with. In this case, deal with the distraction the same way you would with any other workplace distraction. Don't let the fear of people spending all day on their Facebook accounts keep you from adopting social media. This is what your policy should address, as well as regular performance reviews and a good line of communication and regular updates between employees and managers. It's perfectly acceptable (even encouraged) to include a statement in your policy that reads something like, "Although you have access to social networks from your workplace, you are still accountable for the job duties assigned to you and within the time frames they are assigned. Be mindful of your workload, expectations, and deadlines or the social media access may be removed."

In reality, though, social media time spent is no different than many other workplace time-sucks. Being involved in too many committees or having too many meetings can be just as distracting, as can taking on too many projects. Social media is not to blame for this problem, but rather the employee's work habits and time management. Work with the employee to better manage his or her time, rather than eliminate social media access.

Having a social media policy can ultimately save you and your company a lot of time and headaches if you establish who can and can't use social media, what kinds of messages they can send out, and what consequences will happen if the policies are violated. Although it might seem rather harsh and violates the social media hippie viewpoint of "everyone needs to participate in the conversation," they aren't going to bail you out when your company gets into trouble because someone didn't do what he was supposed to.

Trust everyone, but have a policy that deals with those who cannot or do not comply. Remember that even though social media offers a vast world for you and your employees to explore and even play in, social media for your company is about business.

## Endnotes

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# Assign Responsibility and Be Accountable

*This is where everything we've discussed in the last 12 chapters is finally coming together. But there is one question remaining: Who owns social media? If you adopt social media in your company—and if you've made it this far in the book, we hope this is something you're considering—you're going to need to choose where social media lives, who will be responsible for it, who can participate in it, and who has the final say about how it's implemented.*

Ultimately, this needs to be someone you trust, someone you can rely on to speak for the company, to be the face of the company, and to deal with your customers. If you don't have anyone at all in your company who fits that description, then you've made some poor hiring decisions. We talked about this in Chapter 2, "It's Not Them; It's You!" but it bears repeating: If you don't have any employees you trust to talk directly to customers, you don't have an employee problem, you have a management problem. And it all started with the people who hired untrustworthy employees.

But assuming this isn't a problem, and you have identified the right people in the intervening 10 chapters, you now need to start looking at who will manage your social media efforts on behalf of your company.

## The Question of Ownership

We've skirted the question so far: Who should be in charge of the social media efforts at your company? We sort of made a case for marketing in Chapter 5, "Make Some Noise: Social Media Marketing Aids in Branding and Awareness," but that's because we're both marketers. But we've been able to make a case in the other chapters that PR should be in charge of it, or customer service, or sales. The crisis communication employees, who are often in the PR department, may be asked to take over during a major crisis. Or maybe it's the community leaders and brand managers who are in charge of the messaging.

How's this for a no-bullshit answer? There is no one answer. The answer is going to be right for your company, for the people you hire, for the personalities who will handle it, and for the level of trust you actually do have for each of them.

Maybe your sales force is a little older and they think Facebook is stupid. But if your target market is women between the ages of 50 and 60, that's Facebook's fastest growing demographic. Your salespeople are missing out on a great opportunity by ignoring Facebook. So they're not the best candidates. Or your marketing department is going through an internal power struggle right now and you know that introducing social media to the mix is only going to create more problems than it solves, so that might not be the best place to put it. Your customer service department is wildly overworked and understaffed and there's no budget to give it to them right now, although that might change in six months. But rather than put it off for six months, you decide to press on and see if you can lighten their workload in the meantime.

Ultimately, you're going to have to choose which department might be best suited for managing a social media campaign.

## A Quick Review of the Pros and Cons

Looking at the pros and cons of the different departments and how to overcome some of the downsides will help you find the right answer for your company. Keep in mind that these are generalities and not hard-and-fast truths, so it's important to take a look at your own departments and staff before you base a decision on what we're telling you here. These are just general guidelines to give you a place to get started (see Table 13.1).

**Table 13.1** Pros and Cons of Social Media Responsibility by Department

	Pros	Cons
<b>Marketing</b>	Understands how to create a persuasive message, knows how to measure ROI, is most willing to try out new tools. Used to speaking to customers in their own language.	Most likely to blast unwanted commercial messages. Not experienced at solving customer problems. Easily distracted by other new tools. Can easily slip into marketing jargon.
<b>Sales</b>	Consummate networkers who are likely to embrace social media if it helps them avoid the phones. Also more likely to use social media to build relationships with potential customers. This helps them avoid their customers' gatekeepers.	Most likely to avoid social media if they don't see immediate results. Also likely to try blasting commercial sales messages in pursuit of quick results. May be a new way of thinking for old-school salespeople.
<b>PR</b>	Most appropriately trained employees to deal with real-time communications, speaking on behalf of the organization, and building relationships with customers.	Don't usually think in terms of sales and ROI, but in reads, listens, and views. Must be careful not to look down on small-time bloggers and social media practitioners.
<b>Customer Service</b>	Experienced at handling customer complaints and problems.	Not experienced in writing persuasive marketing messages or using sales techniques. Might not be trained to follow up on sales and marketing questions.

## Marketing

**Upside:** This is the most likely place to put it because social media *marketing* is basically what you're trying to accomplish. These are the people who typically understand how to create a persuasive marketing message, are used to measuring the results of a campaign or overall performance, and are often more than willing to try a new tool or toy if it will help them increase market share. They are also adept at speaking to customers in their own language, helping them identify pain points, and showing them how to solve these problems.

**Downside:** They're often willing to try a new tool or toy even if it *won't* help them. They can get easily distracted, so while they think marketing on Twitter and Facebook sounds cool today, they could be distracted by the newest tool tomorrow, without actually making the others work first. They are also not prone to thinking in terms of customer service because they're more focused on gaining new customers. These are also one of the two most likely groups to start blasting commercials via social media, thus alienating your potential customers. They are also most likely to revert to marketing jargon in their messages, so watch out for this.

## ies

**Upside:** Ultimately, these employees are most dedicated to seeing sales numbers go up as a result of a new campaign or effort. These people will most likely buy in if they know that they're going to see more qualified leads, more closes, and higher revenue. A lot of salespeople are consummate networkers, and social media is the ultimate networking tool that lets them get in touch with potential customers and lets them bypass the gatekeepers.

**Downside:** A lot of experienced salespeople (read: older) are so used to jumping on the phones day after day that if they don't think they'll see immediate results, they won't try it. Because social networking is all about building trust and relationships, they might not have the patience and time to build those, relying instead on face-to-face meetings and phone conversations. There's nothing wrong with those, but this is a paradigm shift for a lot of old-school salespeople.

## Public Relations

**Upside:** Public relations professionals are typically the individuals within your organization who have the most experience and training in communicating not just with the public, but in crisis situations. That background gives them the right pedigree to manage and balance real-time and potentially viral conversations that involve happy or unhappy customers. The disciplines of public relations—crisis communications, media relations, event management, community relations—have very logical parallels in the social media space as well: responding to detractors, blogger outreach, event management, building community.

**Downside:** PR people typically don't think in terms of marketing, ROI, and sales. They think of eyeballs, readers, viewers, and total reach. PR people have their own ways of measuring results, but they often don't cross over to sales and profits. You also want to make sure the PR people don't make Target's mistake of turning up their noses at "nontraditional media" (see Chapter 2) and possibly alienating a few thousand bloggers all at once.

## Customer Service

**Upside:** Because a lot of people like to use Twitter and Facebook to complain, who better to be on the front lines communicating with them than your customer service people? These staff members respond immediately to complaints, questions, feedback, and compliments on a daily basis. Not only will they help solve the problems customers are complaining about on social media channels, it also lets your customer service efforts be more visible. That shows your potential customers that you're responsive to problems, and the happy customers will tell their networks, which means you can spread your message to thousands of other people, via the people they most trust: their friends.

**Downside:** Customer service employees have the opposite problem marketing does: They focus on fixing current customer problems, not gaining new customers. So they're not experienced in writing persuasive messages, measuring ROI, or trying to win market share. Customer service people might not be trained to follow up with sales or marketing questions from noncustomers.

## Who Should *Not* Be in Charge

Who are the people who should not be in charge of social media efforts? The legal, IT, or compliance departments. It's not that we have anything against those people. We're sure they're nice people. It's just that in our experience, the legal department will often take days or even weeks to answer a single tweet, by which time a customer's problem will either resolve itself or turn into a bigger problem, which PR has to deal with. (In fact, if your legal department feels they need to approve every single tweet before it goes out, that's a sure sign you're not ready for social media. Or you need to convince your legal department to loosen their ties a bit.)

The IT department isn't equipped to deal with customer service issues, sales questions, marketing issues, or talking to media types. And compliance makes sure that your products or services follow the law. They don't deal with customers or media types either. In fact, IT is often a hurdle that needs to be overcome when trying to implement a social media campaign. We talked about this extensively in Chapter 2.

Even though these people might insist that they need to be involved, we're going to recommend against it for the most part, *unless* you work in a highly regulated industry. And then—and only then—the legal or compliance departments should have a seat at the social media table, but they still should not be in charge. If their indecisiveness or thoroughness gets in the way of you successfully interacting with customers, take away their seat. They can give advice and guide, but they should not be a hindrance to your responsiveness to your customers. We've already seen what happens when the lawyers get involved in talking to customers. Unless you want to

have a big social media crisis caused by people who don't like the way the legal department handled a customer service problem, you won't let them get the keys to the social media car.

But if you think they need to be in charge because you're worried about the risk to your company, put this book down. You're not ready for social media, and you might never be.

## The Ideal Setup

The best setup might be to take a "tiger team" approach and select one or two people from each department to serve on a committee. Put the committee in charge of your social media efforts. Pick a representative from each department who should have influence in your social media campaign and let that team manage it.

Although the people on the committee would continue to serve in their regular day-to-day functions, the social media responsibilities would be added to their day-to-day responsibilities and become a normal part of their job. They would devote the appropriate amount of time to any social media matters that came up.

This is a nice democratic solution that will keep everyone involved. It will also crash and burn in about four months, if you're not careful. If you take the social media committee approach, consider a few caveats before launching it:

- Don't make this a democratic committee where everyone has an equal vote. The only thing slower than the seven-year itch is a committee. Remember Erik's friend who worked at a university with a social media committee in a single department? After six months of regular meetings, they still haven't started a single profile on a single network. If you want to kill an idea, give it to a committee. To kill it extra brutally, make the committee write a mission statement first.
- Put one person in charge of the entire social media effort. This person should be in charge of the committee and the social media campaign, and should ultimately be responsible for making sure everything gets done. Everyone else can make recommendations and give input, but this needs to fall squarely on the shoulders of one person. He or she will make the decisions and create the messaging and the editorial calendar. You don't have a democratic method in any other department in your company; there is always one person in charge who makes sure everything gets done. This committee needs to follow the same model of management.
- A social media committee can also serve as a clearinghouse for the different departmental functions. Any customer service issues can be forwarded to the customer service department, any leads can be forwarded

to the marketing or sales departments, and any serious crises can be sent on to the PR department or elevated to customer service management. This might mean that only one person is handling social media, and he'll farm out the different issues as he sees fit; this is the hub-and-spoke model of social media management. It also means that someone in every department has access to a social media account. Tools like CoTweet let several people participate in a hub-and-spoke model.

- Don't create a committee if that is the normal procedure for any of your interdepartmental efforts. That is, if your standard operating procedure is to create a committee, then don't do it here. What often ends up happening is the same people end up serving on several committees, which means they'll view this as just one more assignment and not give it the attention this needs if you want it to see a positive ROI. You're better off only putting a few people, or even one person, on this assignment and reducing her regular workload to let her fit in her extra responsibilities.

Of course, the best course of action is to make social media a department all its own. Rather than just creating a committee, move one or two people to the new social media department and let them lead the charge. The department should be independent of any of the others because they each have different missions themselves: Marketing is about getting sales leads, sales is about closing the deal, and customer service is about fixing the problems created by sales.

The problem with letting one department run social media is that the others might feel slighted and either fight for control or try to go rogue and do their own social media program. Also, keep in mind that it could take at least 6 to 12 months before you begin to see noticeable results. You will meet some initial goals along the way: adding *X* people to your network or getting *X* visitors to your site per month.

Once you decide which approach you want to take, it's a matter of finding *who* you want to have serving on your committee or new social media department.

## Social Media Management Is for Senior Staff, Not Interns

Social media is *not* only for young people. It's not an entry-level position, it's not only used by entry-level people, and young people are not the only ones who are good at it. The minute you think that, you'll start running into problems because there are plenty of Generation Xers and baby boomers who are on social media.

There are a number of companies who turn their entire social media efforts over to interns and entry-level employees because they mistakenly believe social media is a

young person's game. They think the geezers in management can't grasp the complicated tasks of sending 140-character tweets or reading complaints on Facebook.

Even though the younger employees might be whizzes at Twitter and Facebook, they don't necessarily know how to create an extended strategy, have experience responding to customer complaints, understand how to market and sell enough to be able to do it effectively online, or even know how to calculate the ROI and do basic market research. The net result is that the companies have a Twitter and Facebook presence, but not much else to show for it. They don't know the ROI of their efforts, there are no goals to measure, and their strategy is a one-sentence statement to "do more social media."

It's real simple: Managing social media is not for rookies or the twentysomethings who just started with your company three months ago. Now, we're not saying that these young employees shouldn't *do* social media. If you can get them to be a part of your social media team, that's great. They should be using it because they really *do* get social media and the idea of collaboration and rapid-fire communication. But they should not be in charge of something that would, by any other name, be a major department with a serious undertaking.

Think of it this way: The new PR associate doesn't do media interviews during a major company crisis, the marketing intern doesn't oversee the entire spring launch for your new product line, and the new corporate attorney doesn't defend your company in a civil suit three months after graduating from law school. You would never dream of letting new employees do anything like that, so why would you let a rookie handle one of the most public-facing communication channels your company will ever have? Other than PR and marketing, no other channel reaches so many people so permanently and widely as social media.

By using a more experienced employee, you're able to draw on his real-world, full-time work experience. He can recall similar situations, can understand the gravity of what he's doing, and has experience building and executing campaigns, measuring the results, and speaking with customers with a sense of purpose and company mission. Although we've known a lot of great twentysomethings who are really smart and could make a social media campaign sing, they're few and far between.

## Who Are the Ideal Social Media Practitioners?

There is no one good social media person, but there *is* a limited field of possibilities. Typical social media people are generally going to come from marketing, PR, or sales. They're used to dealing with the public and are generally outgoing and easy to get along with. They're used to multitasking and can manage the sometimes fast pace of social networking and conversations. They also spend a lot of time, or are willing to spend a lot of time, attending conferences, visiting local and regional

networking events (Chamber of Commerce, business networking, and so on), and are comfortable being in large groups of people.

Social media people tend to be more social in nature and view these online networks as extensions of their real-world connections, rather than a replacement or substitute for it. They're happy to meet people outside the office and will evangelize for the company.

This is important because your social media people are going to be performing a number of different functions for your company: public relations, sales, marketing, and customer service. The big four functions that can use social media to their benefit are the same four functions that this one person will employ as your social media mouthpiece. So they need to be customer-focused, sales-minded, public-facing, brand experts. They're going to be a self-starting, self-motivating, revenue-generating, problem-solving, media-earning *force majeure*. So they need to be the kind of people who can handle this all on their own without a lot of input from someone else. This is also why the social media person is not going to be found among the ranks of the most junior employees.

Typically when asked the question, "Who should be in charge of social media in my company?" we answer, "The person most passionate about doing it." If that person happens to be a seasoned communicator who falls into the previous description, you've got your answer. If she doesn't, then you have a candidate who might need some additional oversight. But passion compensates for a lot. Let the person who wants it lead the charges.

## What If Your Employee Becomes a Social Media Rock Star?

Those passionate leads often fast-track themselves to becoming influential within their own market. If the social media industry breeds anything, it's microcelebrities. Few influencers in any industry are as lauded or stroked as those in the social media world, deserving or not. If your company is widely known or your industry is a large one, you can almost count on an active and visible social media evangelist for your company becoming quite the hot ticket for conference speaking and beyond. It happened to Frank Eliason when he started the @ComcastCares account on Twitter and began handling people's customer service complaints. It happened to Scott Monty when he became Ford Motor Company's social media director and to Chris Barger when he took the same position at General Motors. Amber Naslund is another notable industry influencer in the social media world, and she is the vice president of social strategy for social media monitoring software company Radian6.

Some employers worry about what will happen to their employees when they become a big name in their industry or within social media circles. This is a viable

concern. After all, with this kind of microfame comes more opportunities for speaking at conferences, being interviewed by bloggers and media members, and being asked to contribute to industry blogs and trade journals. These situations make those individuals more attractive in the job marketplace and potentially put your company in the position of allowing them to build a personal platform, only to leave.

The best way to consider this employee is as one more marketing channel, as one more way to get the word out about your company. If she is speaking at a conference, then she'll be "Janet Haverstand from ABC Company." If he writes a guest blog post or a trade journal article, his byline will read, "Bob Masterson, director of social media for ABC Company." And, of course, any traditional media mentions will always carry that person's name and job title. Remember, these are things your PR department wants, and your employee's presence in online and traditional media is making their lives easier. These mentions and appearances can then lead to increased awareness for your company, which can lead to more sales.

For example, both of us speak at a variety of conferences and trade groups, regardless of industry. We're often approached after a talk to send more information about our companies. And from time to time, one of those contacts will turn into a project or ongoing client. It's a marketing and lead generation channel for us, and it can be for your company as well.

Think about the benefit Comcast got when Frank Eliason went to a conference to talk about @ComcastCares (or even now, in his role as VP of social media at Citibank). Former Comcast subscribers who left because of poor customer service got to hear about how the cable giant was improving its customer service. And what if that led to even a small handful of subscribers returning to Comcast? Now, Frank was speaking at that conference anyway, but Comcast got a little something extra in return in the form of returning revenue that could vary between \$50 and \$100 a month.

Understandably, the concern most companies have is that the employee is not going to be able to get her work done, will get an unmanageable ego, or will be recruited by another company and hired away.

This isn't an employee management handbook, so we can't tell you a lot about time management or hiring practices or even how to deal with someone with a huge ego. Our hope is that yours is the kind of company where the managers have a good relationship with their employees and they can talk to the employee before any of these things become a problem. The managers should talk with the employee about her workload and meeting her deadlines, about her expectations, and about working well with others. And hopefully your company can match or even exceed a competing offer from another company.

On the other hand, you should also be proud that you were able to train and develop an employee to become such a highly sought-after person that other companies want to hire. You already know that no one stays at a company for their entire career anymore, so the idea that someone leaves for greener pastures shouldn't be a surprise. But your hope should be that your former employee is going to still be in a position to help your company through referrals or even more orders, like if she gets hired by a client of yours.

So it's important that you let your employees shine, rather than trying to hide their brilliance. Let them be the voice and face of your company and let them become rock stars. If they feel like you're giving them a chance to be awesome and to spread their wings, they're more likely to work harder to earn that trust and belief in what they're doing. That can only lead to bigger and better ideas from them, more exposure for them, and, ultimately, more exposure for your company.

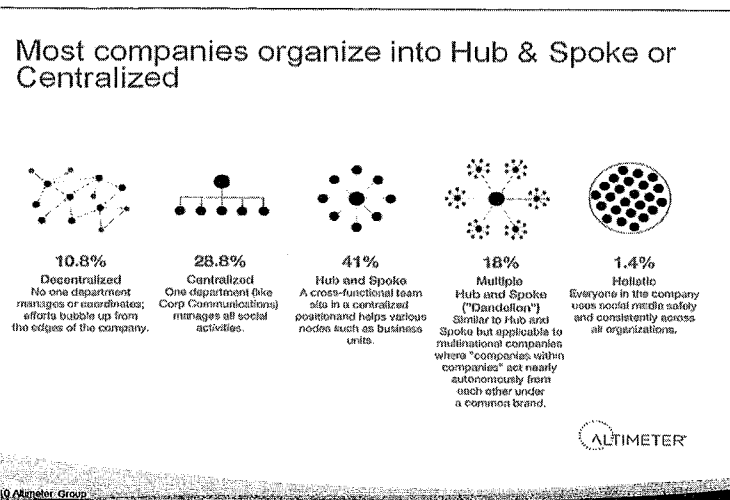
## The Models of Social Media Management

Regardless of who is going to be in charge of social media, or maybe because of it, it's important to decide what kind of social media management model you want. A lot of approaches are going to be based on your own company's dynamics, internal relationships, strength of personalities, and whether you think the people involved can work well in a particular model.

According to Jeremiah Owyang of the Altimeter Group, there are five different models of social media management. (Figure 13.1 gives a basic illustration of what each of them means.)

- *Decentralized* means that no one department manages or coordinates the social media efforts. Each department does its own thing without any guidance or coordinating clearinghouse. The departments may collaborate with each other.
- *Centralized* management puts one department, like corporate communications, in charge of managing all social media efforts. The benefit is that the messaging is centralized and consistent. The downside is that other departments might have a tough time responding to customers.
- *Hub and spoke* means that several cross-functioning teams report to one centralized position. These teams can be different individuals or business units. This could be a tiger team approach, where representatives from different departments all work on this as a committee. The central point monitors all the channels and assigns tasks to the appropriate department or person, who would then respond appropriately. There are online tools that a manager of the hub-and-spoke model can use to assign tasks as needed.

- *Multiple hub and spoke* is like regular hub and spoke, but used with larger companies and multinationals with different locations. This could be a company with offices in different countries and different identities or even a franchise operation where each location gets to maintain its own identity but coordinate its messaging through a centralized hub.
- *Holistic* management is the ultimate in trust in your employees. It means that everyone has the ability to communicate on social media. No one person is in charge, and everyone has the keys to the car. In Chapter 2, we talked about how Zappos shoe company used this model to great effect and was sold for \$928 million while selling \$1 billion worth of shoes per year. The one change we would make is someone should be able to remove certain people from social media duties and monitor the social media metrics to make sure goals are being met.



**Figure 13.1** The Altimeter Group identified several widely used models of social media management, as they are found in different companies around North America.

All of these models require some form of collaboration and cooperation on the part of the people involved and even from those who aren't involved but still need to contribute information or answer questions, like a customer service representative forwarding information to the social media member. This is why it's important to find people who are willing to work together as a team when choosing a model. Although it might be possible to choose a model and say "this is the way we are going to work," it's also likely that you might just want to choose a team and let them determine their own model.

But don't let the democratic process and social media feel-goodery get in the way of actually getting something done. Remember that this is a business decision, and like all business decisions, it needs to happen quickly enough to actually see a decent ROI. That's not going to happen if everyone gets an equal vote and voice. Pick one person to lead the charge and let the others advise them.

## Hold Your Team Accountable

This is where goal setting and measuring results with analytics and social media monitoring services will become important. Knowing what you want your committee to produce and asking for the goals and objectives up front will set the stage at the beginning of your endeavor:

- **Clearly defined goals**—Goals have to be crystal clear and singular. A good rule of thumb is to never include the word *and* in a goal statement. If you have one, split it into two goals. This clarity helps your team develop a litmus test. Is it helping us reach the goal? If yes, move. If no, move on.
- **Measurable objectives**—Where goals are general, broad, but directional, objectives are specific and measurable. "We want to increase sales," is a goal statement. An objective would be more like, "We want to increase sales by 25% through visitors from social media websites by December 31."
- **Strategy**—This is where you build the blueprint or road map for your success. Identify your audiences, where they are online, and the needs you can fill for them. Then delineate which channels you'll use, how they'll integrate, and what calls to action or drivers you'll push in each one. Map out a content strategy for the channels you choose and build milestones in to continually measure and optimize your efforts.
- **Tactics**—Tactics are the steps taken to implement the social media strategy. This is where specific topics and messages formulate into blog posts, Facebook activations, and more. It's where monitoring and responding happens. Think of these as your to-do lists.

Meet with your social media team or the director on a regular basis. Make sure the goals are being met and discuss any changes in the strategy that need to be made to reach them. Give your social media team the flexibility and leeway needed to meet those goals—social media tools are changing on a regular basis, after all—but hold them accountable and make sure those goals are met, both in terms of ROI and profits as well as the size and growth of the network.



Whether you choose one or two people or you create an entire committee or department, finding the right kinds of people to run your social media efforts is necessary if you want to see a positive ROI and increase in sales and your customer base.

Assigning responsibility and holding both yourself and your employees accountable for social media marketing is sort of the glue that holds your efforts together. The management and reporting will keep your organization on course and navigating through the waters, sometimes treacherous, sometimes not, of social media. And that just leaves the last piece of the puzzle for your company to be ready for the social web.