



Social Networking, Privacy, and Employee Speech in the Workplace

PRESENTED BY

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Bullivant Houser Bailey PC is a West Coast business and complex litigation law firm. Founded in 1938, the firm maintains offices in Portland, Oregon; Seattle and Vancouver, Washington; San Francisco, California; and Las Vegas, Nevada. To better serve our clients' international needs, we have established alliances and close working relationships with member firms of MultiLaw.

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Bullivant Houser Bailey PC's employment law team consists of experienced attorneys in four states providing litigation and counseling services to public and private employers across the region and the nation. Our employment team consistently provides clients with the strategic counsel necessary to remain productive, avoid litigation, and successfully defend litigation when it occurs.

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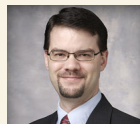
Our presenters



Pam Salgado is an employment attorney who provides advice, counseling and litigation services to employers and high-level executives. The chair of the Employment Law Practice Group at Bullivant Houser Bailey, she counsels employers with regard to employment related laws and issues including federal and state leave laws, the Americans with Disabilities Act (ADA), Title VII, WLAD, the Age Discrimination in Employment Act (ADEA), Older Worker Benefit Protection Act (OWBPA), and the Lilly Ledbetter Fair Pay Act (LLFPA).



Katherine Somervell focuses her practice on all aspects of employment law. She enjoys being able to help her clients solve issues as diverse as dealing with problem employees to ensuring that the documents setting forth their employee benefit plans are compliant with ERISA. Having spent over a dozen years practicing solely in the employment and employee benefits arena, she is able to draw on those years of specialized experience to provide her clients with creative yet pragmatic solutions designed to ensure compliance with state and federal laws and minimize exposure to litigation or investigation.



Brian Keeley focuses on employment and employee benefits. He handles administrative claims and litigation on behalf of employers. He also provides advice and counseling services to employers to help them reduce employment claims and minimize their impact. He also litigates ERISA and employee benefits claims, and advises employers and employee-benefit plans on issues related to employee benefits.

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Discussion points

- The level of privacy an employee can expect regarding electronic communications
- Balancing employee speech with corporate policies
- Tips for handling social networking and employee privacy issues

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Employees and Social Networking



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Employees and Social Networking: What are the potential problems?

- Lack of productivity / time wasting
- Harm to company property or network through viruses
- Negative information posted by employee about the company, supervisors, customers, or products
- Posting by employee of confidential information about the company: customers, new products, marketing or price strategies
- Use of phones while driving
- Endorsing employer's products without disclosing employment relationship
- Harassment and creation of a hostile work environment
- Libel and defamation attributed to the employer

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Employee Privacy

- Whose privacy?
 - The computer-using employee
 - Co-workers, supervisors, clients, and others
- Where?
 - At work
 - Outside of work

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Privacy in Email and Electronic Communications in the Workplace

- The Electronic Communication Privacy Act (“ECPA”) expanded the Federal Wiretapping Statute to cover electronic communications such as e-mail
- However, significant exceptions allow employer monitoring of electronic communications
- Conclusion: employers can monitor!

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Key Laws Governing Privacy

- Several key laws govern privacy in the workplace, but none explicitly govern social networking
- Key laws include:
 - Fair Credit Reporting Act (FCRA)
 - HIPAA
 - ADA
 - FMLA
 - GINA
 - Public Employers: Constitutional protections
 - Securities laws (disclosing information at the wrong time)
 - FTC and other consumer protection laws and regulations requiring that endorsers of products disclose their affiliation with the product or company
 - Off-duty conduct laws (in some states)

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Privacy or Protection of Communications Outside of Work

- Laws that might affect an employee's communications outside the work environment:
 - NLRA's provisions on unfair labor practices
 - Title VII (informal complaints)
 - 1st Amendment (public employers)
 - Anti-discrimination laws (e.g. political affiliation)

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Privacy of Work Communications

- **IMPORTANT: Ensure that your employees have no expectation of privacy with respect to company equipment (computers, blackberries, etc).**
- **This can be accomplished in your employee handbook**

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Protecting Co-workers

- Emphasize that personal information of others should NOT be disseminated
 - Medical Leave, HIPAA
 - Disability laws
 - GINA (disclosure of genetic information)
 - Exception for “water cooler” discussions, but information cannot be pursued

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Protecting the Employer

- Inappropriate emails
 - Title VII Sexual Harassment
 - Disability Discrimination
 - Retaliation
- You do not want your employees sending these emails – but if they do, you want to know about it!

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Balancing employee speech with corporate policies



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Three Key Stages of Employment

- Pre-hire
- During employment
- Post-termination

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The Pre-Hire Stage



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Pre-Hiring Concerns

- Social media checks are a pre-hiring privacy concern
- What to know before you “Google”:
 - An employer may learn about an applicant’s membership in a protected class through online searching
- BUT an applicant’s online conduct may also yield meaningful information, such as . . .
 - An applicant announcing plans to move in the near future;
 - An applicant displaying poor judgment online; or
 - An applicant’s attitudes toward work or toward a particular career

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Pre-Hiring Privacy: A True Story

An anecdote:

- The president of a small consulting company in Chicago logged onto Facebook to research an applicant. The applicant's profile listed his interests as "smokin' blunts," shooting people, and obsessive sex, all described in vivid slang.
 - Needless to say, in this case the applicant's Facebook profile prevented him from getting the job

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Minimizing Risks at the Pre-Hire Stage

- Have on-line searches done by "knowledgeable" personnel who are not decision makers and who remove information about protected classes
- Treat each applicant the same way
 - *i.e.*, a company should not "Google" only one category of applicants
- Consider giving applicants the opportunity to address information uncovered online
 - Make sure you hear it from the right person
 - Consider whether it is something that can be explained
- Gather only publicly available information
- Do not rely on false identities to uncover information

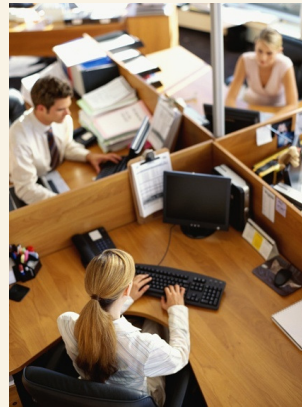
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During Employment

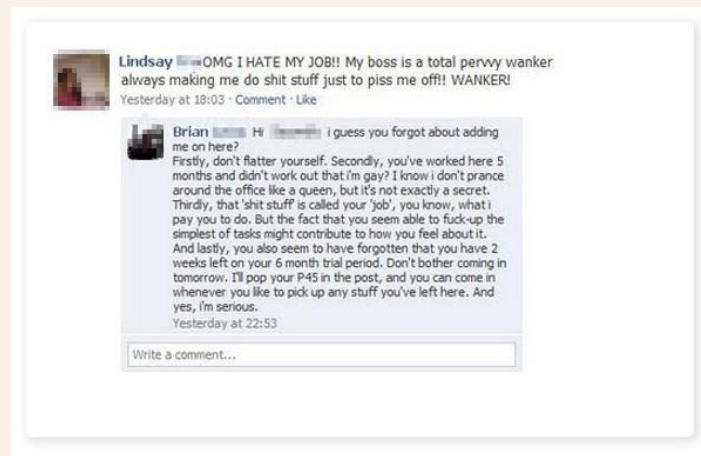


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The Facebook Problem



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The NLRB's Interest

- National Labor Relations Board complaints are impacting the legal landscape
- The NLRB has filed multiple complaints challenging employer's rights to terminate employees over Facebook posts
- The NLRA applies to union and non-union workplaces

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The NLRB's First Facebook Case

- Employee posted on her Facebook page
 - looks like I'm getting some time off. love how the company allows a [psychiatric patient] to become a supervisor,"
 - Another post says, the supervisor is "being a d***" and a "scum***."
- AMR's policy prohibited employees from making negative remarks on the Internet about the company or its employees
- The NLRB said that policy was in violation of the National Labor Relations Act, which gives employees the right to discuss "the terms and conditions of their employment with others."
- AMR settled the case, agreeing to no longer discipline employees for discussing their working conditions on Facebook or elsewhere.

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Another Example NLRB Case

- In September 2010, the Tucson, Ariz.-based Arizona Daily Star fired its crime and public safety reporter for publishing what the paper deemed to be “unprofessional and inappropriate tweets” via his Twitter account. Examples:
 - “What?!?!? No overnight homicide? WTF? You’re slacking Tucson.”
 - “Hope everyone’s having a good Homicide Friday, as one Tucson police officer called it.”
- The Board found that the unnamed reporter’s termination did not violate a provision of the NLRA that protects communications by employees as long as they relate to—or seek to involve other employees in a discussion of—working conditions or employment terms.
- In an advisory memo declining to pursue the complaint, the NLRB noted that even though the Daily Star did not have an internal policy specifically addressing social media communications, its actions were not illegal because the messages themselves were not protected by the law.

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What if?

- An employee starts a Facebook group about working at your company that triggers an online rumor mill?
- An employee who called in sick “tweeted” later in the day about how much fun the beach was?
- An employee blogs in a less-than-complimentary fashion about your company’s best client?

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Balancing employee speech with corporate policies

Post-Termination



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Post-Termination Issues

- Be prepared to immediately cut off access for employees once they are terminated (loop in your IT department)
- Consider saving or archiving former employees' emails (have an archive / retention / destruction policy and follow it)
- Include confidentiality in severance or settlement agreements
- References on LinkedIn: Have a reference policy, and be sure all supervisors and managers know and follow it

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Tips on social networking, email, and privacy issues

1) Have policies in employee handbook / manual:

- Computer use policy
- Email policy
- Internet use policy
- Social networking policy
- Reference policy
- Confidentiality policy

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Tips on social networking, email, and privacy issues

- 2) Communicate consistently with employees regarding policies
- At hire: have employees sign acknowledgments of receiving all policies
 - Communicate policies during employment on an ongoing basis, on regular intervals
 - Consider re-distributing policies periodically as reminders

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Tips on social networking, email, and privacy issues

- 3) Training employees and managers
- Consider adding social networking issues to harassment / discrimination training for all employees
 - Educate managers, supervisors and HR professionals on social networking issues, risks, and pitfalls
 - Train managers, supervisors and HR professionals as to what is accessible on computers and networks

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Tips on social networking, email, and privacy issues

4) Consistent Enforcement

- Ensure that policies are enforced. Otherwise, consider not having the policy.
- Ensure that similar conduct is treated similarly, across departments, across supervisors, and for all employees
- Be aware of retaliation claims by employees who have made a discrimination / harassment complaint

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