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Submission of views on the CIPR Social Media Guidelines consultation by GREEN Communications

Before addressing the specific questions raised by the Social Media guidelines GREEN would like to give its views on the document as a whole.

GREEN believes that the document adds little to the needs of UK PR practitioners currently using or planning to use social media tools.

Firstly, the document addresses social media practices almost solely in relation to the CIPR's existing member Code of Conduct. This risks implying that social media ought to be considered separately from traditional media relations when in reality it is simply another tactic available to practitioners.

Secondly, the document attempts to reconcile social media, a rapidly growing and ground-breaking set of tools, with traditional roles and organisational cultures. Rather it would be better to educate practitioners about the way social media is changing the media and PR landscape.

If the document is to be valid beyond the next six months the CIPR must embrace the changes in society and societal values being brought about by social media and not attempt to contain them within its traditional comfort zone.

However, this point of view is understandable given that the majority of the CIPR's membership represents practitioners who are probably not using social media regularly.

GREEN's response to specific consultation questions:

Question 1: Do you agree that this Formal Advisory (as and when amended) is a sufficient statement or should there be more far-reaching changes to the CIPR Code of Conduct itself to reflect the emergence of social media?

GREEN believes that this Formal Advisory is insufficient in that it aims to be a static

documentation of how social media impinges on the CIPR's Code of Conduct rather than address the way social media and the internet are changing the society and its values and in turn the way PR practitioners engage with society.

Accepting this sea-change in societal values and behaviour may well result in a review of the CIPR's Code of Conduct to reflect the emergence of social media.

Question 2: Do you believe this guidance for employers goes far enough, or should the CIPR issue more detailed advice?

The CIPR's advice for employers is basically sound but not comprehensive enough. Again, however, it seems to be implying that social media needs to be considered as separate from – rather than part of - other PR tactics. For instance, the issues suggested for use in a company social media policy equally apply to other areas of public relations. See below for comparison:

Social media issues proposed by CIPR	Traditional issues for PR practitioners
The type of information employees can share and what should remain confidential	Identical
Personal use of social media during working hours	Personal use of internet during working hours
Guidance on using social media as part of their role	Guidance on delivering any corporate communications in PR or non-PR roles

Question 3: Do you believe employers should be producing a social media policy as standard?

Employers should not need a separate social media policy for the reasons explained above.

Employers must take account of the ways in which social media is affecting or has the potential to affect their brand, reputation and operations. Given the growth of social media and social networks it is imperative the CIPR can provide comprehensive guidance to members on devising social media policies.

As already outlined the guidelines contained in the CIPR's proposed Social Media Guidelines Consultation are basic but need to be more comprehensive.

Question 4: Do you agree with this advice or do you believe that employees should be

prohibited from making any mention of their employer in personal blogs?

This question above all demonstrates exactly how little the CIPR understands social media. This is a preposterous idea and entirely unenforceable. As its name suggests, social media is a range of online media tools that are used by society. Likewise, social media content is created by individuals; it is essentially a series of networks 'owned' and used by society. Controversially it is fragmenting 'established' traditional media outlets both off and online. As a result, the following questions need to be addressed by the CIPR:

3. How exactly would the CIPR propose "prohibiting" employees from making mention of their employer?
4. If the CIPR decided to lobby Government to prohibit employees from mentioning their employer does it think this would be viewed favourably?
5. Does the CIPR understand the idea that linking personal blog content with professional blog or website content - intentionally or otherwise – represents the sea-change that underpins the need for a review of the CIPR's Code of Conduct to adopt to a shift in societal values?

The correct response to that fact that this linking can, and does, happen is not to stop it happening, but for organisations to adopt to the new media and its impact.

Question 5: Do you believe that astroturfing is contrary to the Code's requirement of integrity?

As stated earlier the proposed Social Media Guidelines wrongly seeks to duplicate the CIPR's existing Code of Conduct for what is essentially a specific PR tactic.

Astroturfing is not an activity unique to social media. All off and online astroturfing breaches the integrity of a PR practitioner and therefore breaches the current CIPR Code of Conduct.

Question 6: Do you believe the principles of the Code of Conduct cover astroturfing already, or is more detailed advice necessary?

As astroturfing is not a new phenomenon, the CIPR Code of Conduct should already deal with the problem adequately. If more detail is required then the question should be opened up to all members.

Question 7: Do you agree that such pitches require up-front disclosure of the initiator's role and the nature of the pitch?

From a best practice perspective all practitioners pitching to bloggers should disclose their role and nature of the pitch – as all practitioners pitching to traditional forms of media should.

Where blogging differs from traditional media is that many of the world's 60m bloggers are individuals that blog for personal satisfaction. These people are not media institutions and may not wish to be contacted by PR practitioners. The CIPR should place emphasis on this situation and encourage UK practitioners to check carefully before contacting, as they would with journalists.

Question 8: Should such ghosting be prohibited?

Ethically, ghosting should be prohibited for social media as well as traditional media. This would ensure that all PR material, from blog posts through to CEO press release quotations are fully transparent. Again the question is: prohibited by whom?

Question 9: Where such ghosting occurs, should this be made clear on the blog?

GREEN would always advise clients that having a clear policy is a prerequisite for any blog. This would detail any relevant disclosures including the possibility of ghosting, although GREEN would recommend that if clients are to blog successfully they must communicate in an authentic voice and avoid corporate platitudes.

Question 10: Is there any fundamental difference between ghosting print articles and ghosting online material?

There is no fundamental difference at all.

Question 11: Is it ethical for PR practitioners to be contributing to wikis in a professional capacity?

Yes. As long as PR practitioners contribute to wikis in a way that does not compromise guidelines governing either their professional behaviour or wiki contributors. Examples of these guidelines include the CIPR Code of Conduct or Wikipedia's policy on editing entries which, as this social media paper reminds us, "emphasises that entries must be neutral in tone, factual and verifiable."

Is it not more ethical that PR practitioners contribute in a professional manner where they must adhere to set guidelines as opposed to contributing in a non-professional manner – ie. off-the-

record?

Question 12: If it is ethical, should there be detailed guidance for doing so, and should such guidance be produced by the CIPR or by the online community itself?

There is already guidance in place as demonstrated in the previous answer. The CIPR has sound guidance on the professional behaviour of PR practitioners and eg. Wikipedia has guidance on how contributors should behave.

As the internet is – for the most part – an extremely open and self-regulating environment PR practitioners who wilfully disregard available guidance are likely to damage their reputation or the reputation of their client significantly among the communities they are specifically trying to target.

Question 13: Do you believe this document covers the issues highlighted in sufficient depth?

No, we don't think it does. But this is primarily because of the CIPR's attempt to create a document that aims to capture in time a rapidly shifting set of values.

One of the defining attributes of online and social media is the idea of a constantly evolving drive for new technology. It is a medium defined by a state of perpetual development or 'beta'. It is a social medium based around networked communities that are continuously evolving.

Approaching the medium from a traditional PR perspective will not work. Social networks are made up of fragmented, highly active users, rather than passive, mass media audiences.

As mentioned in the introduction to this response, if this document is to be valid beyond the next six months – or at all - the CIPR must embrace the changes and not attempt to contain or constrain them within its traditional comfort zone.

Question 14: Do you believe there are other important issues which should be addressed (and if so, what are they)?

Hopefully the way in which the internet and social media is changing the way business, law, public policy, politics, culture, in fact everything which is influenced by society, functions has been demonstrated above. The impact of social media cannot be

understated or underestimated.

The PR industry has at its core reputation management. This management is undertaken through the effective building and management of mutually beneficial relationships. These attributes – relationships and mutual understanding – are central to social media. The CIPR must take serious and open-minded steps to ensure it stays in touch with society and its shift in values, behaviour and expectations.

GREEN Communications is prepared to help the CIPR better understand social media should it require assistance.

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