

# Transparency International Policy Regarding Online Employee Content

Last updated 02 April 2012

## A. Introduction and Scope

A growing number of conversations about core Transparency International (TI) issues are taking place on the Internet, and an increasing number of key TI stakeholders are turning to the Internet for information.

TI aims to promote the creation of online content by its employees, since interacting with stakeholders on the Internet is a vital step for participating in conversations on issues with which TI is concerned, strengthening TI's existing relationships, and promoting TI's values and messages worldwide.

All TI employees are subject to this policy. It covers content authored or posted online by or on behalf of a TI employee on a website or other Internet service operated or maintained by TI, as well as to content posted by or on behalf of a TI employee on other sites that refers to TI, including by identifying the author as a TI employee (collectively, "Employee TI Content"). In addition, this policy applies to content authored or posted online by or on behalf of TI employees in their personal capacities, and not as a part of their work for TI ("Employee Personal Content").

Like other TI policies, this policy is subject to local and international law and TI's Code of Conduct. All employees are expected to comply with all applicable legal obligations, as well as their employment contracts and, as appropriate, confidentiality obligations.

## B. Requirements for Employee TI Content

The following requirements apply to Employee TI Content:

1. TI's policies and procedures, including those contained in the TI Code of Conduct, apply to all forms of communications published by or on behalf of TI, including Employee TI Content.
2. Employee TI Content must meet the same standards of professionalism and ethics required of content in all TI publications (including standards for accuracy, objectivity, fairness, attribution, obscenity, and other matters of taste and judgment), as determined by TI in its exclusive discretion. TI may instruct employees to submit certain Employee TI Content to TI editors or counsel prior to publication.
3. Plagiarism in any Employee TI Content is prohibited.
4. Employee TI Content must not violate copyright, trademark, and all other applicable intellectual property laws, infringe the intellectual property rights of TI or any other party, or violate TI's standards governing the use of third-party content.
  - Employee TI Content may refer to or place a link to third-party websites, except that no Employee TI Content may indicate or imply an affiliation with or endorsement of or by any third party, except when expression of such a relationship is expressly approved by TI.
  - Employee TI Content may not include substantial quotations, excerpts, images, or other content created by third parties (including user comments posted on TI websites), except when TI has received prior written permission from the owner of the content for the use or when TI counsel has approved the use.

5. Employee TI Content must not include material or statements that are false, misleading, libelous, defamatory, obscene, abusive, hateful, or sexually explicit, or that violate any applicable law, as determined by TI in its exclusive discretion. Employee TI Content also may not include negative or derogatory references to individuals or groups on the basis of race, sex, religion, sexual orientation, nationality, or similar characteristics, as determined by TI in its exclusive discretion.
6. If Employee TI Content reflects an employee's personal opinion or point of view, the Employee TI Content must include substantially the following language: "The opinions expressed in this publication are those of [EMPLOYEE NAME] alone. This publication does not necessarily reflect the views, positions, strategies, or opinions of Transparency International."
7. Employee TI Content should not be derogatory or detrimental to the image, reputation, political neutrality, or interests of TI, as determined by TI in its exclusive discretion. For the purpose of illustration but not limitation, Employee TI Content may not:
  - advocate support for a particular political party;
  - disclose facts concerning individual cases of corruption or accuse individuals or entities of wrongdoing, except when the disclosed information is already generally available to the public, but Employee TI Content may include links and references to reliable third-party information; or
  - include content that would undermine the integrity or impartiality of TI or create or imply a conflict of interest.
8. If an employee is unsure whether particular material is permitted to be included in Employee TI Content under this policy, that employee should contact his or her line manager or TI's press department before publishing the material.
9. If an employee is contacted by the press (including bloggers and Internet-only press) seeking comment on any matter that could involve TI, or if the employee's comment is sought because of his or her affiliation with TI, the employee should withhold comment and refer the call or message to the press department.
10. Employees must not reveal private, personal, or confidential information, trade secrets, or other legally protected information unless they have the right or authority to do so. This may include aspects of TI policy or details of internal TI discussions. When in doubt about the definition of personal data, employees must contact the Data Protection Officer (Conrad Zellmann at [czellmann@transparency.org](mailto:czellmann@transparency.org)) prior to disclosing the information.
11. Employees must inform the relevant line manager or project coordinator before posting any Employee TI Content that discusses or promotes specific TI projects or publications.
12. TI reserves the right to monitor and remove Employee TI Content from its websites without notice to the relevant employee(s). TI also reserves the right to instruct employees to delete or remove Employee TI Content from non-TI websites if TI determines that the Employee TI Content violates this policy. By posting Employee TI Content, employees agree to honor any such request from TI as promptly as possible.

### **C. Requirements for Employee Personal Content**

Blogs and other forms of online publication on third-party websites where the employee is not specifically authorized to speak on or behalf of TI are individual, personal activities and

interactions, not corporate communications, and employees therefore agree to take legal responsibility for Employee Personal Content. Some readers may nonetheless unavoidably view employees as *de facto* spokespersons for TI, and TI therefore requires employees to observe the following requirements, as well as any TI policies applicable to online activities more generally.

1. Employees who already have, or would like to start, a personal blog or a website which could reasonably indicate or imply that he or she works at TI should discuss any potential conflicts of interest with his or her line manager.
2. Employees should use good judgment and discretion, and conduct themselves in a manner consistent with applicable law, any applicable employment agreement provisions, and TI's values and standards of conduct.
3. Employees should not post Employee Personal Content to third-party sites during their work hours or use TI resources to do so.
4. Employees should make clear that the views expressed in Employee Personal Content are theirs alone and do not necessarily represent the views of TI. Employees should include a simple and visible disclaimer to that effect in a fairly prominent location (e.g., "The views expressed on this site/blog are my personal views and don't necessarily represent the views, positions, strategies, or opinions of my employer.").
5. Employee Personal Content should disclose conflicts of interest. For example, employees should identify their employment affiliation when they blog or make online statements about TI, TI's products and services, and/or related matters.
6. Employees must not reveal private, personal, or confidential information, trade secrets, or other legally protected information, including details of TI's policies and internal deliberations, unless they have the right or authority to do so. In addition, employees should not publish or allow to be published in Employee Personal Content any nonpublic or sensitive information that they have obtained as a result of their affiliation with TI.
7. Plagiarism in Employee Personal Content is prohibited.
8. Employee Personal Content should not violate copyright, trademark, and all other applicable intellectual property laws, infringe the intellectual property rights of TI or any other party, or violate TI's standards governing the use of third-party content. Specifically, employees may not use TI's trademarks or copyrighted material in Employee Personal Content without advance permission from TI.

#### **D. Periodic Review and Updating of the Policy**

Designated TI personnel will periodically review and update this policy to ensure that it reflects existing practices and law. TI Chapters will confirm that they maintain and use the current version of the guidelines.

#### **E. Questions**

This policy provides general guidelines for Employee TI Content and Employee Personal Content, but it cannot and does not anticipate or address all potential issues that may arise in connection with such content. Employees with questions about this policy should contact [ ] prior to publishing any material that they believe may violate this policy, other TI policies and standards, or applicable law.