



**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

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**PURPOSE**

The purpose of Lansing Housing Commission's Electronic Communication and Social Media Policy is to maximize the benefits of electronic communications to LHC, and its employees and customers, protect LHC and its employees from liability and/or performance challenges, highlight the problems associated with inappropriate use of social media and describe the consequences of policy violations.

I. Company Property

As a productivity enhancement tool, LHC provides and encourages the business use of electronic communications (notably the Internet, voice mail, electronic mail, and fax). Electronic communications systems, owned by LHC, and all messages generated on or handled by these electronic communications systems, including back-up copies, are considered to be the property of LHC. Any attempt to violate, circumvent and/or ignore these policies could result in corrective action, up to and including termination. (Note: Computer and Electronic Equipment Policy #2009-11)

II. Authorized Usage

LHC's electronic communications systems must be used solely to facilitate the business of the company. Users are forbidden from using LHC electronic communication systems for private business activities, personal, or amusement/entertainment purposes. Employees are reminded that the use of company resources, including electronic communications, should never create either the appearance or the reality of inappropriate use. Employees shall not access or disclose a tenant/client/program participant's (even if that individual is a family, friend, or co-employee) personal information from any LHC source (e.g., documents, computer system), unless previously authorized, in writing, by the **Department Director** to do so for a specific work-related purpose. Inappropriate use may result in loss of access privileges and disciplinary action, up to and including termination. (Note: Section J Computer and Electronic Equipment Policy #2009-11)

III. Proper Usage

Employees are strictly prohibited from using LHC computers, e-mail systems, and Internet access (except at lunch or break) for personal reasons or for any improper



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purpose (at any time). Some specific examples of prohibited uses include, but are not limited to:

1. Transmitting, retrieving, downloading, or storing messages or images which are offensive, harassing, abusive, derogatory, off-color, sexual in content, or otherwise inappropriate in a business environment.
2. Making threatening or harassing statements to another employee, or to a vendor, customer, or other outside party.
3. Transmitting, retrieving, downloading, or storing messages or images relating to race, religion, color, sex, national origin, citizenship status, age, handicap, disability, sexual orientation, or any other status protected under federal, state and local laws.
4. Communicating confidential information to individuals inside or outside LHC or to other organizations, without specific authorization from management to do so.
5. Sending or receiving confidential or copyrighted materials without prior authorization.
6. Soliciting personal business opportunities, or personal advertising.
7. Gambling, monitoring sports scores, or playing electronic games.
8. Downloading software without approval from a manager. Software that is approved for downloading must be registered to the Housing Authority.
9. Copying software, unless such copying for legitimate back-up purposes and has been approved by a manager.
10. Knowingly introducing a computer virus or any other contaminating or destructive features in to LHC computer systems.
11. Downloading files from the internet except for an express business purpose.



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12. Sending or forwarding any chain email, broadcast email or spam.
13. Use a LHC email address or internet access for personal gain including outside employment, self-employment, and family owned businesses.
14. Download radio, video, or music transmissions from internet sites without approval.
15. Attempt to defeat any security mechanisms to gain unauthorized access to computer files or other information on the Housing Authority's telephone systems, electronic communication systems, or information systems.
16. Attempting to read, intercept, copy, or delete emails sent or received by other users.
17. Posting or transmitting any message anonymously under a false name or permitting any other individual to do so; Impersonating another person; Collection information about others including email addresses, without their consent.
18. LHC's phone, fax machine, computer systems, or provided communication devices shall not be used for personal financial gain or to solicit others for activities related to LHC's operations, or in connection with political campaigns, lobbying, or religious purposes.

**IV. User Identification**

Where electronic communication systems provide the ability to identify the activities of different users, these facilities shall be implemented. For example, electronic mail systems shall employ personal user-IDs and associated passwords to isolate the communications of different users. Fax machines that do not have separate mailboxes for different recipients may not support user separation.

**V. User Accountability**

Regardless of the circumstances, individual passwords must never be shared or revealed to anyone else besides the authorized user. To do so exposes the



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authorized user to responsibility for actions taken by others with the password. Violation of this could result in corrective action towards the authorized user and the person receiving the password, up to and including termination. If users need to share computer resident data, they should utilize message forwarding facilities, public directories on local area network servers, and other authorized information-sharing mechanisms. To prevent unauthorized parties from obtaining access to electronic communications, users must choose passwords, which are difficult to guess (for example, not a dictionary word, not a personal detail, and not a reflection of work activities).

VI. User Identity

Misrepresenting, obscuring, suppressing, or replacing a user's identity on an electronic communications system is forbidden. The user name, electronic mail address, organizational affiliation, and related information included with electronic messages or postings must reflect the actual originator of the messages or postings.

VII. No Expectation of Privacy

Employees should expect that all information created, transmitted, downloaded, received or stored in LHC computers may be accessed by LHC at any time, without prior notice. Employees should not assume that they have an expectation of privacy or confidentiality in such messages or information (whether or not such messages or information is password protected), or that deleted messages are necessarily removed from the system.

VIII. Regular Message Monitoring

Contents of electronic communications may be monitored and the usage electronic communications systems will be monitored to support operational, maintenance, auditing, security, and investigative activities. LHC reserves the right to disclose any electronic messages to law enforcement officials without prior notice to any employees who may have sent or received such messages. Users should structure their electronic communications in recognition of the fact that LHC will, from time to time, examine the content of electronic communications. Employees are reminded that all messages are LHC records. Therefore, LHC reserves the right to access and disclose all messages sent over its electronic messaging systems. LHC's IT vendor and Supervisors may review the electronic communications of the employees they supervise to determine whether there have



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been any breaches of security, violations of LHC policy or unauthorized actions on the part of the employee.

**IX. Contents of Messages**

Workers must not use profanity, obscenities, or derogatory remarks in electronic messages discussing employees, customers, competitors, or others. Such remarks—even when made in jest—may create legal problems such as trade libel, defamation of character, or harassment/discrimination claims.

Special caution is warranted because backup and archival copies of electronic mail may actually be more permanent and more readily accessed than traditional paper communications. Therefore, transmission of obscene or harassing messages to any other individual is strictly prohibited.

**X. Message Forwarding**

Recognizing that some information is intended for specific individuals and may not be appropriate for general distribution, electronic communications users should

exercise caution when forwarding messages. LHC's sensitive information must not be forwarded to any party without the prior approval of a supervisor. Blanket forwarding of messages to parties outside LHC is prohibited unless prior permission of the supervisor has been obtained.

**XI. Handling Information About Security**

Users must promptly report all information security alerts, warnings, suspected vulnerabilities, and the like to their supervisor. Users are prohibited from utilizing LHC systems to forward such information to other users, whether the other users are internal or external to LHC.

**XII. Public Representations**

No media advertisement, Internet home page, electronic bulletin board posting, electronic mail message, voice mail message, or any other public representation about LHC may be issued unless it has first been approved by Executive Director, and/or legal counsel prior to usage.



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**XIII. Harassing or Offensive Materials**

LHC computer and communications systems are not intended to be used for, and must not be used for the exercise of the workers' right to free speech. Sexually explicit words and images, ethnic slurs, racial epithets, religious or political statements or anything else that may be construed as harassment or disparagement of others based on their race, national origin, sex, sexual orientation, age, religious beliefs, or political beliefs may not be displayed or transmitted. Unwanted telephone calls, electronic mail, and internal mail are strictly prohibited and is cause for disciplinary action including termination. Users are encouraged to respond directly to the originator of offensive electronic mail messages, telephone calls, and/or other communications. If the originator does not promptly stop sending offensive messages, Users must report the communications to their supervisor and Human Resources.

LHC retains the right to remove from its information systems any material it views as offensive or potentially illegal.

**XIV. Communication Using Social Media**

Inappropriate communications, even if made on your own time using your own resources, may be grounds for discipline up to and including immediate termination. We encourage staff to use good judgment when communicating via blogs, online chat rooms, networking internet sites, social internet sites, and other electronic and non-electronic forums (collectively "social media"). All employees should be mindful of the content of their electronic communication. If for some reasons you choose to "friend" other LHC employees, understand that LHC's various workplace policies may apply.

The following is a general and non-exhaustive list of guidelines you should keep in mind:

1. Make it clear that the views expressed in social media are yours alone. Do not purport to represent the views of LHC in any fashion.
2. Do not disclose confidential or proprietary information regarding the company, your co-workers or customers. Use of copyrighted or trademarked company information, trade secrets, or other sensitive information may subject you to legal





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action. If you have any doubt about whether it is proper to disclose information, please discuss it with your manager.

3. Do not disclose information that could subject the company to legal liability. Data about certain financial transactions, confidential information as described by the U. S. Department of Housing and Urban Development, information about medical and health records, and other disclosures may be restricted by state or federal laws. If LHC is subjected to government investigation or financial liability based on your disclosures, the company may seek to hold you personally responsible.
4. Do not use LHC logos, trademarks, or other symbols in social media. You may not use the company name to endorse, promote, denigrate or otherwise comment on any product, opinion, cause or person.
5. Be respectful of the privacy and dignity of your co-workers and LHC clients. Do not use or post photos of co-workers without their express consent and do not post the same for clients under any circumstances.
6. Harassing, obscene, defamatory, threatening, or other offensive content must be avoided. Harassing or discriminatory comments, particularly if made on the basis of gender, race, religion, age, national origin, or other protected characteristic, may be deemed inappropriate even if the company name is not mentioned. If social media communications in any way may adversely affect your relationships at work or violate LHC policy, you may be subject to discipline up to and including immediate termination.
7. Ensure that engaging in social media does not interfere with your work commitments.
8. Whether a LHC employee opts to create or participate in social media sites for personal reasons is his/her own decision. "Personal" use of social media is any participation that is not authorized by LHC.
9. Your use of social media sites through LHC equipment must be job-related for an approved social media application/project. Accessing personal social media site accounts from a LHC computer during your work time is strictly forbidden.



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While generally what you do on your own time is not LHC's concern, anything you post will ultimately be your responsibility. Your personal online communications are individual interactions, not LHC communications. If you choose to participate in a social media site, please exercise sound judgment and common sense.

Violations of this Policy may result in discipline up to and including dismissal