

A Better Partnership®



# Employee Handbooks

**Steven A. Palazzolo**  
**Senior Counsel**

# WHY?

- ◆ That's right, why?
  - › The first thing I want to cover before we get into the what is the why.
  - › Why do you have a handbook?
  - › There is no law that requires you to have a handbook.
  - › There are some laws that require you to have a policy and to put that policy into a handbook if you have one, but nothing in the law requires you to have an employee handbook in the first place.
    - So why spend all this time and effort on one?
    - Have you ever asked yourself that?

## OK, now we can talk about what!

- > What is our handbook going to look like (and I don't mean the font size and layout)
  - Is it going to be very long and very comprehensive?
    - The CFISD (Cypress-Fairbanks Independent School District) Employee Handbook is . . . Drum roll please . . . . 177 pages long and includes everything from an EEO Policy to a map to the credit union. The table of contents is 4 pages long, for goodness sake.  
[http://www.cfisd.net/humanres/employee\\_handbook.pdf](http://www.cfisd.net/humanres/employee_handbook.pdf)

## OK, now we can talk about what!

- > What is our handbook going to look like (and I don't mean the font size and layout)
  - Or will it be short and to the point?
    - When Sam Zell took over the Tribune Company he and his management staff issued a handbook with 11 pages. (Tribune Company has 14,000 employees.)
    - (Now I know some people think Zell has ruined the Tribune Company and his management staff has been accused of some pretty bad behavior lately, but that does not hurt my point. No matter how long or what it says, you have to have world class management if you want to make any handbook work.)
    - <http://www.heartharmony.com.au/TribuneNewHandbook.pdf>

Before we get into the substance, let's talk about the NLRB!

## **WHY? This is a handbook, not a CBA!**

- ◆ True, but don't forget the NLRA applies to non-union employers too!!!!
  - > The NLRB will invalidate an employer rule or policy if the Board concludes that the rule/policy prohibits or "chills" employee protected concerted activities or other rights under the National Labor Relations Act. The Board does not require proof that a challenged rule or policy has actually been applied to restrict protected rights.

## The NLRB Standard.

- ◆ [A]n employer violates Section 8(a)(1) when it maintains a work rule that reasonably tends to chill employees in the exercise of their Section 7 rights. Lafayette Park Hotel, 326 NLRB 824, 825 (1998). In determining whether a challenged rule is unlawful, the Board must, however, give the rule a reasonable reading. It must refrain from reading particular phrases in isolation, and it must not presume improper interference with employee rights. Id. at 825, 827. Consistent with the foregoing, our inquiry into whether the maintenance of a challenged rule is unlawful begins with the issue of whether the rule *explicitly* restricts activities protected by Section 7. If it does, we will find the rule unlawful.

If the rule does not explicitly restrict activity protected by Section 7, the violation is dependent upon a showing of one of the following: (1) employees would reasonably construe the language to prohibit Section 7 activity; (2) the rule was promulgated in response to union activity; or (3) the rule has been applied to restrict the exercise of Section 7 rights.

**Lutheran Heritage Village-Livonia, 343 NLRB 646 (2004)**

Remember, you don't have a duty unless the duty is imposed by law or you assume a duty.

## What the heck does that mean? Yes, it's lawyer stuff!

- ◆ Two ways you may have some obligation (legal obligation) to your employee:
  - > The law gives you the obligation.
    - For example:
      - You can't harass employee because of protected categories;
      - You can't discriminate against employees because of protected categories.
  - > You assume an obligation.
    - For example:
      - You have a contract of employment that says you won't fire an employee except for just cause.

So, if you don't want an obligation, don't make a promise.

**My cardinal rule # 1 of employee policies and handbooks:**

**Don't make a promise  
you're not willing to  
keep.**

So, if you don't want an obligation, don't make a promise.

**My cardinal rule # 2 of employee policies and handbooks:**

**It's way better to not  
have a policy at all than it  
is to have a policy you  
don't follow!**

# Things you should do when writing or reviewing your handbook!

## **Ask yourself these questions:**

- ◆ Why do we have this handbook, policy, rule?
- ◆ If we have this handbook, policy, rule, do we actually follow this handbook, policy, rule?
- ◆ Do we actually need this handbook, policy, rule or one like it?

# So, let's start with the BIG 3.

## #1. At Will

- ◆ Everyone has an at-will statement (unless you are a just cause employer).
  - > Here is a sample:
    - “Nothing contained in this Handbook is intended to nor does it create a contract of employment for any specific duration. I understand and agree that my employment can be terminated with or without cause and with or without notice at any time at the option of either me or the company. I understand that no employee of the company has the authority to enter into any agreement for employment for any specified period of time or to make any agreement contrary to the foregoing.”

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**So, remember our questions: Do we want this rule?**

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**What if you want to arbitrate disputes with your employees?**

# So, let's start with the BIG 3.

## # 2. EEO

- ◆ Here is a sample, just in case you don't have one:

It is the policy of Zo's that no employee, applicant for employment, customer, vendor, independent contractor or other individual will be discriminated against based upon age, race, color, creed, religion, sex, sexual orientation, national origin, disability, veteran status, or other protected class or characteristic established under applicable federal, state or local statute or ordinance.

Zo's will not condone, permit or tolerate discrimination as described above. Persons who engage in such discrimination will be subject to appropriate discipline up to and including termination of his/her employment.

If you feel you have been subjected to discrimination, or have witnessed any discrimination, please report it immediately to your supervisor, to HR or straight to Zo. Any complaint of alleged discrimination will be carefully investigated. Should there be any violation of this policy, appropriate actions will be taken to correct the matter. Zo's will not tolerate retaliation against anyone who in good faith lodges a complaint under this policy.

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Zo's will not condone, permit or tolerate discrimination as described above. Persons who engage in such discrimination will be subject to appropriate discipline up to and including termination of his/her employment. **Zo's will provide reasonable accommodations that do not create an undue hardship to Zo's to qualified individuals with a disability as those terms are defined in the Americans with Disabilities Act and in accordance with the requirements of the ADA.**

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# So, let's start with the BIG 3.

## # 3. Anti-Harassment

It is our policy here at Zo's to provide a work environment free from harassment. Zo's will not tolerate any conduct that violates this policy, and will promptly investigate and resolve all alleged complaints and take appropriate disciplinary action against employees who violate this policy.

Zo's will not tolerate harassment of any employee by any other employee, supervisor, vendor or customer. Harassment for any discriminatory reason, such as sex, race, color, national origin, disability, age, religion, marital status, sexual orientation, or any other protected category, violates Zo's policy.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors or any other conduct of a sexual nature when: (1) submission to the conduct is made, either implicitly or explicitly, a condition of employment; (2) submission to or rejection of the conduct is used as the basis for an employment decision affecting the harassed employee; or (3) the harassment has the purpose or effect of unreasonably interfering with the employee's work performance or creating an environment that is intimidating, hostile or offensive to the employee.

You must exercise your own good judgment to avoid any conduct that may be perceived by others as harassment or that may violate this policy. The following conduct is a partial list of these behaviors:

- Unwanted sexual advances
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters
- Verbal conduct: making or using derogatory comments, epithets, slurs and jokes
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations
- Physical conduct: touching, assaulting, impeding or blocking movements

If you believe that you have been subjected to conduct that violates this policy, you must report it immediately to your supervisor, to HR or straight to Zo. Any complaint of alleged harassment will be carefully investigated. Should there be any violation of this policy, appropriate actions will be taken to correct the matter. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating that situation. No employee in this organization is exempt from this policy. In response to every complaint, Zo's will take prompt and necessary steps to investigate the matter and will protect your confidentiality as much as is possible, recognizing the need to thoroughly investigate all complaints. Zo's will take corrective and preventative actions where necessary. Zo's will not retaliate against any employee who in good faith brings a complaint to the attention of Zo's or participates in an investigation regarding a complaint. Any employee who violates this policy is subject to discipline, up to and including termination.

# A couple of things to point out in # 3.

## # 3. Good Anti-Harassment Policies

**cover  
more than just “sexual”  
harassment**

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sexual favors or any other conduct of a sexual nature when:  
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**You define sexual harassment specifically**

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**Notice you have taken on a duty  
in this policy -  
The duty to investigate**

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**Don't over promise confidentiality**

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Now let's get into some other stuff I have noticed lately.

## The Family and Medical Leave Act

- ◆ If you have 50 or more employees and any of them are eligible under the FMLA you have to have an FMLA policy, and if you have an employee handbook that policy has to be in your employee handbook. 29 CFR § 825.300(3):
  - > (3) If an FMLA-covered employer has any eligible employees, it shall also provide this general notice to each employee by including the notice in employee handbooks or other written guidance to employees concerning employee benefits or leave rights, if such written materials exist, or by distributing a copy of the general notice to each new employee upon hiring. In either case, distribution may be accomplished electronically.

# So why are we talking about the FMLA?

## **Because I have seen a couple of handbooks that don't have the military leave amendments in them.**

- ◆ Eligible Employees are entitled to FMLA leave for a “qualifying exigency” of service:
  - Employees may take up to 12 weeks of leave because of a “qualifying exigency” arising out of the fact that a spouse, parent or child of the employee is on active duty or has been notified of an impending call or order to active duty in the National Guard or Reserves in support of a contingency operation. Qualifying exigencies must relate to the active duty or call or order to active duty and include such things as attending to legal and financial matters; providing urgent childcare or making alternative schooling or childcare arrangements; attending or participating in certain non-medical counseling sessions; attending military events; attending post-deployment and reintegration briefings; spending time with a military member who is on short term rest and recuperation leave during deployment; and addressing issues that arise due to short-notice call or order to active duty. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

## So why are we talking about the FMLA?

### **Because I have seen a couple of handbooks that don't have the military leave amendments in them.**

- ◆ Eligible Employees are entitled to FMLA leave to care for a family member injured while on active duty:
  - › Eligible employees may take up to 26 weeks of leave to care for a family member (spouse, child, parent or next of kin) who is a member of the Armed Forces, the National Guard, or the Reserves and who is undergoing medical treatment, recuperation or therapy, is in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness incurred in the line of duty on active duty. Leave under this category may only be taken during a single twelve-month period beginning from the first date of leave. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

## So why are we talking about the FMLA?

**Not only do you want to make sure that your FMLA policy is up to date, make sure you are using the correct forms.**

- ◆ You can find the government forms at:
  - > <http://www.dol.gov/whd/fmla/>

## Next, you need a Social Security Privacy Policy.

### **This is a Michigan Law**

Zo's understands the importance of protecting the confidentiality of its employees' Social Security numbers and those collected in the ordinary course of Zo's business. Neither Zo's nor any of its employees will unlawfully disclose Social Security numbers obtained during the ordinary course of business. Zo's will limit access to information or documents containing Social Security numbers to those employees who need the information to do their jobs.

In addition, Zo's will shield Social Security numbers displayed on computer monitors or printed documents from being easily viewed by others. Unless required to do so, Zo's will not use Social Security numbers as personal identifiers, permit numbers, license numbers, or primary account numbers or other similar uses.

Zo's may use a Social Security number to perform an administrative duty related to employment, including, for example, to verify the identity of an individual; to detect or prevent identity theft; to investigate claims; to perform a credit check, criminal background check or driving history check; to enforce legal rights; or to administer benefits programs.

All provisions of this policy are subject to the language of the Social Security Number Privacy Act of the State of Michigan.

# Social Media and Computer Use.

## Before we talk policy, we are going back to the NLRB.

- ◆ In December 2009, the National Labor Relations Board considered whether the social media policy promulgated by Sears Holding Corp. violated the NLRA by prohibiting employee disparagement of the company's "executive leadership, employees [or] strategy."
- ◆ The Board *dismissed* the charge, opining that, read in context among many prohibited activities, a reasonable employee would *not* consider that provision to be an improper limit on his / her conduct.

**BUT...**

## Social Media and Computer Use.

- ◆ In February 2011, the National Labor Relations Board filed a complaint alleging “that [an] employee’s Facebook postings constituted protected concerted activity, and that the company’s blogging and internet posting policy contained unlawful provisions, including one that prohibited employees from making disparaging remarks when discussing the company or supervisors and another that prohibited employees from depicting the company in any way over the internet without company permission.”
- ◆ The company, a Connecticut ambulance company, settled with the NLRB, agreeing to not fire employees for engaging in online discussions of wages and other terms and conditions of employment.

## Social Media and Computer Use – the FTC Guidance.

**The Federal Trade Commission (FTC) recently issued guidelines dealing with Product Claims on Social Networking Sites. When an Employee talks about the PRODUCTS or SERVICES of his Employer on a social media platform,**

- ◆ Employees can become *Endorsers*,
- ◆ Employers can become *Advertisers*,
  - › And, the Employer may be liable for any FTC violation committed by their endorsing employee.

# Social Media and Computer Use – the FTC Guidance.

## Advertisers must

- ◆ ***Educate*** their endorsers regarding their responsibilities

AND

- ◆ ***Monitor*** their endorsers' communications, statements and claims.

So the FTC requires a formal social media policy.

# Social Media and Computer Use – the FTC Guidance.

## Basic Requirements

- ◆ Written
- ◆ Comprehensible
- ◆ Communicated
- ◆ Implemented
- ◆ Effective

... Basically, easy enough for a baby to understand and comply with.

# Social Media and Computer Use – the FTC Guidance.

## **The FTC's Minimum Requirements**

- ◆ Standards of conduct for employees (the “Do’s and Don’ts”);
- ◆ Requirements that employees disclose all material connections;
- ◆ Confirmation of understanding from the employee;
- ◆ Notification of the training and monitoring systems in place;
- ◆ Consequences for violations of the policy.

## Questions & Answers



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