

COUNTY OF SAN BENITO, CALIFORNIA COUNTY ADMINISTRATIVE MANUAL		
CHAPTER: 0500 County Social Media Use Policies	Policy Number (PN): 2016-05-000	Page Page 1 of 11
<p>PURPOSE:</p> <p>The County of San Benito has a business need to augment traditional communication methods to reach a broader audience with the use of social media channels. This need primarily stems from public demand and the rapid growth of social media use by other local, state and federal government entities as an indication that social media can be used effectively to enhance constituent communications. In general, the County supports the use of social media technology to enhance communication, collaboration and information exchange; streamline processes; foster productivity improvements; and further the goals of the County and the missions of its departments, where appropriate.</p> <p>However, the use of social media presents opportunity and risk to the County and individual County departments. Therefore, their application must not compromise data confidentiality and integrity. The same standards of conduct, principles and guidelines that apply to County of San Benito employees in the performance of their assigned duties apply to employee social media technology use. The purpose of this policy is to provide initial guidance for all County of San Benito employees who use Social Media and Social Media venues to engage with customers on behalf of San Benito County.</p> <p>Should the County change its direction on social media use, this policy will be revised and agency/department social media activity shall be adjusted accordingly.</p> <p>Department use of social media technology shall conform to the policies, protocols and procedures contained, or referenced, herein.</p> <p>DEFINITIONS:</p> <p><i>Social Media</i></p> <p>The U.S. Government defines social media as the various activities that integrate technology, social interaction, and content creation. Through social media, individuals or groups can create, organize, edit or comment on, combine, and share content. Social media uses many technologies and forms, including social-networking, blogs, wikis, photo-sharing, video-sharing, podcast, social bookmarking, mash-ups, widgets, virtual worlds, microblogs, Really Simple Syndication (RSS) and more. Not all forms of social media may be appropriate for use by County departments.</p>		

Official County Email Account

Email account provided by a department mail system or approved external mailbox that is used for official County business.

Approved County Social Networking Site

Approved County social networking site refers to social networks that the County Administrator's Office (CAO) and Information Technology (IT) Department have assessed and approved for use by County departments.

Post

An administrator submitted message/blog in the form of, but may not be limited to, text, videos, photographs, graphics, links (hyperlinks), documents, computer applications, etc.

Comment

A user submitted response to an administrator post.

RESPONSIBILITY**Board Approval**

Administrative Policy No. P2016-05-000: Social Media Use Policy was approved by the San Benito County Board of Supervisors on May 10, 2016.

CAO and IT

The County Administrator's Office and/or a designee from the Information Technology Department is responsible for facilitating this policy in compliance with established Board rules and protocols. This includes responsibility to audit department use of social media and enforce policy compliance.

Department Head

Within the terms of this policy, Department Heads have authority to determine and establish social media activity at the department program level. Additionally, the Department Head is responsible for facilitating this policy in compliance with established Board rules and protocols. This includes responsibility to audit department use of social media and enforce policy compliance.

No posts shall be removed, nor shall a user be banned, without Department Head review and approval of such action. The Department Head shall consult with County Counsel's as necessary.

Social Media Coordinator

The Social Media Coordinator is appointed by the Department Head, or his/her designee, with authority to use social media on behalf of the department and responsibility to ensure the appropriateness of content.

POLICY PROCEDURES

POLICY 1: County Social Media Technology Use

Agency/department use of social media technology shall conform to the policies, protocols and procedures contained, or referenced, herein.

- 1.1** Comply with all applicable federal, state, and county laws, regulations and policies. This includes adherence to but may not be limited to established laws and policies regarding copyright, records retention, , California Public Records Act, First Amendment, Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act (HIPAA), Hatch Act of 1939, privacy laws, employment related laws, plus County established policies such as but not limited to County's Personnel Policies and Procedures.
- 1.2** Be familiar and carry-out social media activity in accordance with the County's Social Media Participation Guidelines (PN2016-05-001), where applicable.
- 1.3** Establish and utilize social media in accordance with the County's Approved Social Media Networks and Usage Standards (PN2016-05-002).

POLICY 2: Agency/Department Decision to Embrace Social Media

Departments who choose to utilize social media shall:

Establish a well thought out social media work plan that complements countywide policies and considers the department's mission and goals, audience, legal risks, technical capabilities, security issues, emergency response procedures, etc. The workplan shall be submitted to IT and County Administrator's Office for review.

An agency/department's decision to embrace social media shall be a risk-based business decision approved by the Department Head and supported by a strong business case that considers the agency/department's mission and goals, audience, legal risks, technical capabilities and potential benefits. Agencies/Departments who choose to utilize social media shall:

- 2.1** Have a strong understanding of the risks associated with using social media in order to make an effective business decision.

- 2.2** Engage internal Agency/Department IT, Risk Management and County Counsel Representatives to assess the risks of utilizing a specific County approved social networking site in comparison with the business opportunities expected.
- 2.3** Establish a well thought out social media strategy.
- 2.4** Develop and maintain agency/department specific social media policies and procedures. HR shall be consulted to provide advisory on labor impacts.
- 2.5** Require authorized staff to complete social media security training.
- 2.6** Have security controls in place to protect County Information and Technology assets.
- 2.7** Shall only allow access to social media sites for business use through county owned devices
- 2.8** Designate a Social Media Coordinator responsible for overseeing the agency/department's social media activity and policy compliance, and security protection.

POLICY 3: Access to Social Media Networks

Access to social media networks from within the County's IT infrastructure is limited to individuals performing official County business and to agencies/departments with sufficient Information and Technology security controls.

- 3.1** Social media sites used for county business shall only be accessed through County owned devices and county approved networks.
- 3.2** County computers, laptops and mobile devices used to access social media sites shall have up-to-date software to protect against destructive technical incidents, including but may not be limited to, cyber, virus and spyware/adware attacks.
- 3.3** IT and Agency/Department shall make a diligent effort to provide authorized users access to social media networks from within agency/department work sites.
- 3.4** County hosted websites shall not contain automatic feeds to uncensored social media site content. Prior to approving content for display on County websites, agencies/departments shall have monitoring protocols in place to ensure content and links are appropriate and free from harmful technical attacks.

3.5 Department shall have security controls in place to protect County information and technology assets against potential destructive technical incidents.

3.6 Perceived or known compromises to the County's internal network shall be promptly reported to IT.

POLICY 4: Authorized Use

Department Heads, or designees, are responsible for determining who is authorized to use social media on behalf of the agency/department, and for designating appropriate access levels, which decisions shall be reviewed by the CAO at his/her discretion.

4.1 Social media network access shall be limited only to those with a clear business purpose to use the forum.

4.2 Appropriate access levels include identifying what sites, or type of sites, the individual is approved to use, as well as defining capability: publish, edit, comment or view only.

4.3 Only Official Spokespersons, Public Information Officers and select individuals shall have permission to create, publish or comment on behalf of a County Agency/Department.

4.4 Authorized users shall be provided a copy of the County's social media policy and are required to acknowledge their understanding and acceptance via signature.

4.5 Only those departments and specific employees, as authorized by the County Administrative Office, shall engage in social media on behalf of the County. Social media activities shall be initially be limited to management staff only, but may be expanded in the future by authorization of the County Administrative Office.

POLICY 5: Approved Social Media Networks

Agencies/Departments shall only utilize County approved social media networks for hosting official County social media sites.

5.1 Social media networks under consideration will be reviewed and approved by the County Administrative Office and IT with consultation from County Counsel, HR and Risk Management-when appropriate.

- 5.2** For each approved social media network, usage standards will be developed to optimize government use of the site in correlation with the County's overall business mission and County Social Media Use Policy.
- 5.3** IT is responsible for maintaining the list of approved social media networks and site related usage standards.
- 5.4** Social media networks on the approved list shall be reviewed annually for changes to terms of use agreements and/or new/expired offerings.
- 5.5** An agency/department may request review and approval of additional social media networks as needed. (Reference Policy 2015-07-002).

POLICY 6: Official County Social Media Sites

County agency/department social media sites shall be created and maintained in accordance with County social network usage standards and with identifiable characteristics of an official County site.

- 6.1** Social media network usage standards are accessible from IT
- 6.2** County social media network accounts shall be created using an official County email account, when possible.
- 6.3** Sites shall contain visible elements that identify them as an official County of San Benito site. Among other items, this includes displaying official County seals, agency/department brands, contact information and a link to agency/department websites.
- 6.4** County social media sites shall display, or provide a link to, the County's social media disclaimer and any applicable social media or electronic communication policies. (Reference Policy 2015-07-003 for more information).

POLICY 7: Site Content

Departments are responsible for establishing and maintaining content posted to their social media sites and shall have measures in effect to prevent inappropriate or technically harmful information and links.

- 7.1** Social Media Coordinators shall review site activity daily for exploitation or misuse.
- 7.2** Social media content shall fully comply with all of the County's Personnel Policies and Procedures. Information shared through social media channels

shall fully comply with agency/department Communications policies and procedures, where applicable, and shall not disclose confidential or proprietary information.

7.3 Contents posted on County social media sites may be considered public records subject to disclosure under California's Public Record Act ("PRA" – Government Code §§ 6250 et. seq.). PRA requests for the production of posts on a County social media site shall be referred to County Counsel for review and response.

7.4 Sites shall provide a link to the County of San Benito's Media User Responsibility Guideline or comment policies, and, if needed, Departments will consult with County Counsel to develop department specific disclaimers to meet the County's legal needs.

7.5 Following forms of content posted by external and authorized users may be subject to removal if they contain:

- A. Profane language or content;
- B. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regards to public assistance, national origin, physical or mental disability or sexual orientation, or other protected classes;
- C. Sexual harassment content, sexual content or links to sexual content;
- D. Solicitations of commerce or advertisements including promotion or endorsement;
- E. Promotion or endorsement of political issues, groups or individuals;
- F. Conduct or encouragement of illegal activity;
- G. Information that may tend to compromise the safety or security of the public or public systems;
- H. Content intended to defame any person, group or organization;
- I. Content that violates a legal ownership interest of any other party, such as trademark or copyright infringement;
- J. Making or publishing of false, vicious or malicious statements concerning any employee, the County or its operations;
- K. Violent or threatening content;
- L. Disclosure of confidential, sensitive or proprietary information;
- M. Advocating for alteration of hours, wages, and terms and conditions of employment (applies to County employees only).
- N. Comments that are not topically related.

7.6 Content violating the County's social media policies and individual violators shall be removed. Contact County Counsel on any legal issues.

7.7 Departments shall have preventative measure in place against potential

destructive technical incidents.

7.8 County websites shall remain the primary and predominant source for Internet information.

7.9 Sharing or posting content owned by others shall be performed in accordance with copyright, fair use and established laws pertaining to materials owned by others. This includes, but is not limited to, quotes, images, documents, links, etc.

7.10 Use of sites that are not Section 508 web accessible shall contain “simple” text links to identical material on a compliant website or other social media network.

7.11 It is not intended to use social media sites in a way that guarantees the right to protected free speech. Each agency/department is responsible for monitoring postings, and taking appropriate action when necessary, to protect general site visitors from inappropriate or technically harmful information and links.

7.12 Sites that allow public comment shall inform visitors of the intended purpose of the site and provide a clear statement of the discussion topic introduced for public comment so that the public is aware of the limited nature of the discussion and that inappropriate posts are subject to removal, including but not limited to the following types of postings regardless of format (text, video, images, links, documents, etc.):

- comments not topically related;
- profane language or content;
- content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regards to public assistance, national origin, physical or mental disability or sexual orientation;
- sexual content or links to sexual content;
- solicitations of commerce;
- conduct or encouragement of illegal activity or political involvement;
- information that may tend to compromise the safety or security of the public or public systems;
- content that violates a legal ownership interest of any other party.

7.13 Agencies/Departments choosing to allow posts from the public on County social network sites, shall prominently display, or provide a link to, the County’s

Comment Policy.

7.14 Agencies/Departments choosing to use public comments shall consult with County Counsel to develop agency- or department-specific disclaimers to meet the County's legal needs. County Counsel may also be consulted to determine whether to remove comments that violate this policy.

7.15 County Blogs shall be established with moderated controls, which at minimum require that blog post (comments) be approved prior to blog publishing.

- Agencies/Departments that choose to use blogs shall designate a moderator whose responsibilities will include the review of any comments submitted as part of an online discussion.
- Comments or posts that do not comply with the County's Comment Policy or Appropriateness of Content Policy shall not be approved for blog publishing.

7.16 No posts shall be removed, nor shall a user be banned, without Department Head review and approval of such action. The Department Head shall consult with County Counsel's as necessary.

POLICY 8: User Behavior

The same standards, principles and guidelines that apply to County of San Benito employees in the performance of their assigned duties apply to employee social media technology use.

8.1 Authorized users shall do so only within the scope defined by their respective agency/department per Policy 4 of this document, and in compliance with all County and IT policies, practices and use agreements and guidelines.

8.2 Departments and Authorized Users shall incorporated San Benito County 2016-05-001, *Social Media Participation Guidelines*, as part of user behavior.

8.2 Authorized social network spokespersons participating in personal social networking discussions related to County business matters shall indicate that viewpoints are personal and may not reflect County opinion.

8.3 Authorized County social media users shall complete social media security training.

8.4 Workforce members performing County social media work beyond normal work hours shall receive pre-authorization from the agency/department.

8.5 Employees shall obey all laws, including but not limited to, the Hatch Act of 1939, when using social media.

8.6 Violations of this policy shall be reviewed on a case-by-case basis and may result in appropriate disciplinary actions.

POLICY 9: Records Management

Agency/Department use of social media shall be documented and maintained in an easily accessible format that tracks account information and preserves items that may be considered a record subject to disclosure under the California's Public Records Act or required to be retained pursuant to the Government Code.

9.1 Agencies/Departments are responsible for the creation, administration and deactivation of social media accounts.

- Account password information shall only be shared with authorized staff that has been designated by the Department Head, or her/his designee, to fulfill the role of site account administrator.
- Passwords shall conform to County complex password requirements when permissible.
- Account password shall promptly be reset when an employee is removed as an account administrator.

9.2 Agencies/Departments shall maintain a record of social media sites created for County use, including, but may not be limited to:

- A log file containing the name of the social media network, account id, password, registered email address, date established, authorizing representative and name of person who created account and agreed to the sites terms of use agreement and/or policy.
- A record of the sites usage agreement at the time the site was created and any updated versions.
- A list of authorized site content authors and editors.

9.3 Electronic information posted to a social media site by the County, or a member of the public if permitted, may be considered a record subject to California's Public Record Act.

- Any content maintained in a social media format that is related to County

business, including a list of subscribers and County or public posted communication, may be a public record. Agencies/Departments shall have procedures in effect to preserve published social media content.

- The Agency/Department maintaining the site is responsible for responding completely and accurately to any public records request for public records on social media.
- Site content shall be maintained in accordance with its respective Records Retention Schedule and in accordance with County IT policies and procedures. If the content constitutes a public record, it must be disclosed to the public unless an exemption applies.
- Posts deemed technically harmful or inappropriate per Policy 7 shall be promptly documented, saved pursuant to IT policies and procedures regarding record retention and removed.

9.4 Agencies/Departments shall maintain a record of signed social media policy acknowledgement forms for each authorized user.

POLICY 10: Site Monitoring

Agency/Department social media sites shall be monitored regularly and prompt corrective action shall be taken when an issue arises that places, or has potential to place, the County at risk.

10.1 Agency/Department social media site administrators/coordinators shall review site activity and content daily for exploitation or misuse.

10.2 Agency/Departments that allow the public to post comments, links or material directly onto their social media sites shall have an established process, including technical capability outside of the County's network, to verify that postings meet the rules established under Policy 7 of this document. Posts deemed technically harmful or inappropriate shall be handled per procedure.

10.3 Agencies/Departments choosing to use public comments shall consult with County Counsel to develop agency- or department-specific disclaimers to meet the County's legal needs. County Counsel may also be consulted to determine whether to remove comments that violate this policy.

10.4 Agencies/Departments shall be responsible for monitoring employee use of social media and social networking websites.

10.5 Perceived or known compromises to the County's internal network shall be promptly reported to County IT.

SUNSET DATE

This policy will be reviewed for continuance by 05/10/2023.

Version History:

Version Number	Change Request Number (if applicable)	Date	Author	Summary of Change	Effective Date
Original		05/10/016	IT	NA	05/10/2016