St. Charles County
Social Media and County Website Access Policy

1 APPLICABILITY

This policy is applicable to County employees or contractors who create or contribute to the County website or social networking tools on or off the sccmo.org domain for County purposes, including but not limited to staff in the Communications, Public Health, Police, Parks and Prosecuting Attorney departments.

2 PURPOSE

The role of technology in the 21st century workplace has expanded beyond a single County-hosted website and now includes social media communication tools that facilitate interactive information sharing and collaboration. Many of these tools and/or websites have large, loyal user bases and are thus, increasingly important outreach and communication tools for government entities.

Social networking can improve interactivity between government and the public and often reaches new and different populations than traditional media.

St. Charles County desires to have a communications plan that includes social media strategies. In doing so, however, St. Charles County takes care to choose a combination of traditional methods and social media that provide tools that distribute information across multiple outlets to the broadest audience.

All County communication tools should be used in ways that provide clear communication, maximize transparency, maintain the security of the County network, and are appropriately professional. Social media is no exception. Therefore, the application of social media within St. Charles County Government must be done thoughtfully and in a manner that will minimize risk.

This policy is intended to ensure that the County website and utilized social networking tools and sites are secure, appropriately used, and managed through best practices. This policy is designed to protect employees and ensure consistency across communications and departments when incorporating websites and social media into their communication strategy.

3 DEFINITIONS

3.1 Social Media

Describes the online technologies, tools and practices that people use to share news opinions, insights, experiences, and perspectives. Social media can take many different forms, including text, images, audio and video. These sites and tools typically use technologies such as websites, blogs, message boards, podcasts, wikis, and video logs to allow users to interact.
3.2 County Website
The sccmo.org domain and all domains registered to St Charles County Government.

3.3 Communications Manager
The Communications Manager within the Communications Department who reports to the Director of Communications.

3.4 County Communications Director
The County’s Director of Communication is responsible for content development and maintenance for the general County social media sites, and oversees and monitors the departmental sites and having ultimate decision making authority for the use of social media.

3.5 Authorized Agent
St. Charles County employee who has been assigned duties by their Elected Official or Department Director of posting or managing electronic content on behalf of the County.

3.6 Department:

3.6.1 Executive Branch Department whether headed by an appointed director or elected official

3.6.2 County Board or Commission

4 IMPLEMENTATION
St. Charles County and its departments need an adopted communications plan with a clear strategy for how social media fits into this strategy. The County’s Communications Manager, with oversight and approval from the Communications Director, spearheads this activity and, in doing so, consider the following questions when determining whether use of social media is appropriate:

- Who is the target audience for social media communications?
- What information is the department attempting to communicate? Which social media tools are the best to distribute this information?
- Who is responsible for managing the different social media tools/accounts? Will this person represent the department appropriately? Has staff been properly trained in the use of social media? What team of people will back the primary user in the event of vacation, emergency or job transitions? If a consultant’s work includes social media outreach, which accounts will be used and who will approve content?
- What are the department’s responsibilities regarding collection and records retention including preservation of social media content? What does the records retention schedule require for these records?

A department’s decision to embrace social media shall be a risk-based business decision approved by the individual department director and the County Communications Director and supported by a strong business case that considers the County and department’s mission and goals, audience, legal risks, technical capabilities and potential benefits. Access to social media networks from within the County’s IT infrastructure is limited to individuals performing official County business upon approval of the individual department director, County Communications Director in consultation with the Director of Information Systems. The Director of Information Systems shall make a diligent effort to provide authorized users secure access to social media networks from within the County’s IT infrastructure.
Director of Information Systems shall maintain security controls over social media networks to protect the County’s IT infrastructure.

When the County Communications Director approves a form of social media that is deemed beneficial to the County’s mission, the Communications Manager will establish protocols for using the service. It is important for the Communications Manager to communicate expectations of appropriate usage for social media within the workplace to those providing content or the department authorized agents who are directly managing the content.

The authorization process for departments wishing to create an account for the benefit of the department or County as a whole shall be led by the Communications Director. The Communications Director will oversee and confirm decisions in consultation with the Director of Information Systems. In this role, the Communications Director will evaluate all requests for usage, verify staff being authorized to use social media tools, and confirm completion of training for social media. The department director or his/her authorized agent shall work with the Communications Manager to establish the accounts and shall provide all applicable usernames and passwords to the County Communications Manager, Communications Director, and Assistant Director of Administration. Should the employee who administers the account be removed as administrator or no longer be employed by the County, the Communications Manager should immediately change all passwords and account information to maintain County control.

Any department-related social networking usage implemented prior to the release of this policy should be reviewed by the Communications Director to make sure it is brought into compliance with these guidelines.

With regard to the County website, authorized agent access rights to post content to the site may be granted by Director of Communications.

In summary, the Communications Director will:
- Oversee and confirm decisions regarding social media tools including authorization of tools
- Evaluate requests for usage
- Have final authority to edit or remove content within legal constraints
- Verify staff being authorized to use social media tools

The Communications Manager will:
- Maintain a list of social media domains, active account logins and passwords
- Change passwords if an employee is removed as administrator in order to maintain County control

5 ACCEPTABLE USE

All use of social networking sites by County staff and departments should be consistent with applicable state, federal, and local laws, regulations, and policies including all information technology security policies. This includes: First amendment rights; acceptable use policies; applicable records retention schedules or policies; procedures, standards, or guidelines used by the Executive Office. 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.
Account structures:
Generally, County social media accounts should not be linked to an Authorized Agent’s personal social media account. However, some social media platforms Terms of Use policies, specifically Facebook, prohibit fake accounts or avatars for the purposes of managing business pages. Consequently, Authorized Agents must log into their personal Facebook accounts and utilize them in order to gain administrative privileges of the County account page. In these instances, Authorized Agents are allowed to utilize County equipment to access personal accounts exclusively for the purposes of managing County social media and doing so is not considered a violation 115.1000.H OSCCMo.

Personal responsibility:
Authorized Agents are to be thoughtful about how individual presentation and representation through online social networks, where the lines between public image and private image, and personal and professional brands can be blurred. Employees’ personal social-networking sites should remain personal in nature and should not be used for work related purposes; however, Authorized Agents are encouraged to share County posts with their personal networks, specifically on platforms such as Linked In, as this expands the network of people who are likely to engage with County messages.

Professional Use:
All County-related communication through social media outlets should remain professional in nature and should always be conducted in accordance with the County’s communication policy, practices, and expectations. Professional use of these tools must comply at all times with the Electronic Information Policy contained in Personnel Administration Program. Employees should be mindful that inappropriate usage of social media can be grounds for disciplinary action.

If an account is used for County business, other than for the purposes of accessing a business page (see attached notification from Archive Social re: Facebook’s stepped up enforcement of fake individual accounts for the purpose of business page management), the entire account, is subject to this policy, including the collection and preservation provisions.

Examples:
- An elected official who chooses to originate and promote County business mixed with personal views and updates, subjects the account to this policy and the content must be retained.
- An Authorized Agent who logs into their personal Facebook page in order to access the County Facebook page in order produce content as part of their job, does not subject their personal account to the requirements of this policy.
- An Authorized Agent who has a Linked In account and shares a post of the County’s on their account or creates a post that highlights news already shared by the organization does not subject their personal account to the requirements of this policy.

Ethics:
Employees should be mindful of the St. Charles County Personnel Administration Program (PAP). The PAP applies to social media content and use.
Terms of Service:
Authorized agents should be aware of the Terms of Use or Terms of Service (TOS) of the particular form of social media. Each form of social media has its own unique TOS that regulate how users interact using that particular form of media. Any authorized agent using a form of social media on behalf of the County should regularly consult the most current TOS, and notify the Communications Director and provide a copy of an updated TOS to the Communications Director, Director of the Department of Information Systems and the County Counselor. If the TOS contradict County policy then the Director of Communications should be made aware and a decision should be made whether use of such media is appropriate.

6 CONTENT MANAGEMENT

Nothing in this policy otherwise abrogates the County’s communication policy in which all items posted to the County website, social media sites, or otherwise produced for public consumption shall first be reviewed by the County Communications Manager and/or Communications Director unless the Communications Director authorizes an Agent to post to a site without prior review of material.

Clear comment policies for Public users:
Whenever possible, County social media websites should clearly outline Terms of Use and Comment policies.

Content of Posts and Comments:
Authorized agents using social media to communicate on behalf of the County should be mindful that any statements made are on behalf of County government; therefore, employees should use discretion before posting or commenting. Once these comments or posts are made, they can be seen by anyone and usually cannot be deleted. Consequently, communication should include no form of profanity, obscenity, or copyright violations. Likewise, confidential or non-public information should not be shared. Employees should always consider whether it is appropriate to post an opinion, commit oneself or one’s Department to a course of action, or discuss areas outside of one’s expertise. If there is any question or hesitation regarding the content of a potential comment or post, it is better not to post. There should be care given to screening any communication made on behalf of the County using social media as improper posting and use of social media tools can result in disciplinary action.

Removal of Comments:
It shall be the policy of St. Charles County that all comments made by the public relate to the original post by the County on social media platforms. Those that are not, will be removed. In addition, comments regarding political candidates and/or issues, the use of profanity, discriminatory or harassing language, comments containing personally identifiable information about individuals without their expressed permission, comments and discussions involving details of active law enforcement cases and investigations, and links to third party sites is prohibited and comments containing this content will be removed. Comments from County employees also are subject to removal if the employee is communicating on behalf of the County or about County actions or policy without appropriate approval and/or information communicated is inaccurate or meets any of the above criteria. Any amendments or deviation from the policy will be done in consultation with the County Counselor. Any decision to remove or hide a comment from a social media platform shall be made exclusively by the Director of
Communications or Assistant Director of Administration and not an Authorized Agent. Additionally, at the discretion of the Director of Communications or Assistant Director of Administration, public reviews and related comments on County social media platforms can be removed after one year.

7 RECORDS RETENTION

Communication through county-related social media is considered a public record and will be managed as such. The Communication Department is responsible for maintaining public records of all County social media and beginning in 2016 started using Archive Social as retention platform. All comments or posts made to County account walls or pages are public, not private. This means that both the posts of the employee administrator and any feedback by other employees or non-employees, including citizens, will become part of the public record. Because others might not be aware of the public records law, departments should consider include the following statement (or some version of it) somewhere on the social networking site:

Representatives of St. Charles County government communicate via this website. Consequently any communication via this site (whether by a county employee or general public) may be subject to monitoring and disclosure to third parties.

In the spirit of transparency, account administrators who receive messages through the private message service offered by the social media site should encourage users to contact them at a public e-mail address maintained by the County. For private messages that account administrators do receive, they should be treated as constituent e-mails and therefore, as public records. Account administrators or another authorized staff member should reply using their County e-mail account.

8 SECURITY

The Department of Information Systems is primarily concerned with security of County information and platforms and shall give on-going consideration to preventing fraud or unauthorized access to social media sites.

Use best practices to mitigate security risks

Security related to social media is often a behavioral issue, not a technology issue. In general, employees unwittingly providing information to third parties pose a risk to the county network. Employees need to be aware of current and emerging threats that they may face using social media tools and how to avoid falling prey. Adminstrators of social media shall:

- Use separate user IDs and passwords to access social networking sites.
- Never duplicate user IDs and passwords across multiple social networking sites.
- Never use a St. Charles County network IDs and password for a social media website.

The County Communications Department shall:
- Train users about what information to share, with whom they can share it, and what not to share.
- Educate users about security awareness and risks when using social media.
• Help employees set appropriate privacy settings for social networking websites.

9 TOOLS & SOFTWARE

Social media tools and trends change rapidly and the County Communications Department and will work to keep up with recent trends.
• Branding standards will be established by the County Communications Department and appropriate authorized agent.

Revisions:
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