

Category: 300  
Number: 329

Subject: **SOCIAL MEDIA POLICY**

1. **PURPOSE:** Saginaw County supports the use of social media to enhance communication, collaboration, and information exchange to further the goals of the County. The County of Saginaw desires to establish a social media policy and procedures in order to mitigate associated risks, and establish acceptable standards for Saginaw County full-time, part-time, temporary and seasonal employees, volunteers, contractors and vendors. It also provides guidance on the County's expectations regarding the use of the County's social media by its employees, contractors and vendors in an appropriate manner.
2. **AUTHORITY:** The Saginaw County Board of Commissioners.
3. **APPLICATION:** This policy applies to all employees, independent contractors, volunteers, service providers, interns and others using the County's computer resources and/or posting on behalf of Saginaw County.
4. **RESPONSIBILITY:** Controller's Office - Information Technology (IT) will administer this policy with assistance and guidance from the Personnel Department.
5. **DEFINITIONS:**
  - 5.1 Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Saginaw County, as well as any other form of electronic communication. This includes but is not limited to:
    - 5.1.1 Multimedia and social networking sites such as Facebook, Twitter, Flickr, Tumblr, Reddit, Instagram, Snapchat and YouTube;
    - 5.1.2 Social networking sites with an emphasis on professional exchange of information and development of business, such as LinkedIn;
    - 5.1.3 Blogs, microblogs, wikis, message boards, comment sections, social bookmarking websites, and other community based sites or collaborative tools;
    - 5.1.4 Social commerce postings product and or/experience reviews such as Amazon, Facebook groups, and Craigslist; and
    - 5.1.5 Other sites where information (text, images, video, sound, or other files) can be uploaded or posted.

6. POLICY:

6.1 Employee Authorization on Behalf of Saginaw County

- 6.1.1 Only authorized individuals shall have permission to act as a user to create, publish or comment on behalf of the County. Authorization is granted by the Controller/CAO for the County of Saginaw non-elected offices, Elected Officials for elected offices; and Chief Judge for the courts. Such permission will be granted only after a social media work plan is approved by IT (work plan committee).
- 6.1.2 Authorized users will be designated as social media coordinators and will be granted access to County social media platforms and authorized to post on behalf of Saginaw County. Authorization cannot be transferred to or among employees. If at all possible each authorized user will have a personal login and password. Passwords must be kept confidential.
- 6.1.3 Appropriate access levels will be established for each user to identify what sites, or types of sites, the individual is approved to use, as well as defining capability: publish, edit, comment or view only.
- 6.1.4 Once authorization is given it is up to the Department to monitor all employee postings.
- 6.1.5 Engaging in conduct in on-line communities that could be interpreted as false, inflammatory, in violation of county policy or constitutes violations of the privacy of others, may subject you to disciplinary action up to and including discharge.

6.2 General Guidelines for County Social Media

- 6.2.1 Saginaw County employees who are authorized users will comply with all applicable federal, state and county laws, regulations and policies including but not limited to copyright, records retention, First Amendment, privacy laws, FOIA, HIPAA, employment related laws, personally identifiable information, and County established policies and procedures. 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.

- 6.2.2 County computers, laptops and mobile devices used to access social media platforms shall have up-to-date software approved by IT to protect against destructive technical incidents.
- 6.2.3 Hourly employees cannot work on social media outside of normal work hours without prior approval as this practice may result in overtime. Failure to obtain prior authorization may result in disciplinary action.
- 6.2.4 Employees are not to display items of a personal nature or interest on County social media networks.

### 6.3 Posting Guidelines for County Social Media

- 6.3.1 Inappropriate postings may include but are not limited to: discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct, reasonably viewed statements, photographs, video or audio that are considered malicious, obscene, threatening or intimidating, that disparage customers, members, employees or suppliers, or that might constitute harassment or bullying. Inappropriate postings will not be tolerated and may be subject to disciplinary action up to and including termination.
- 6.3.2 Any inappropriate postings from the general public will be deleted. These include spam and off-topic content or links to other sites. If content must be removed, it must be recorded, documented and submitted to the Department Head and IT for review and record retention. Unacceptable content and individual violators shall be promptly documented with a screenshot or printout, emailed to IT, and then removed immediately. IT will also contact the County Controller and legal counsel on any issues. The following forms of content posted by external and authorized users may be subject to removal if they contain:

- Comments not topically related;
- Profane language or content;
- Content that promotes, fosters, or perpetuates discrimination of protected classes;
- Sexual content or links to sexual content;
- Solicitation of commerce or advertisements including promotion or endorsement;
- Conduct or encouragement of illegal activity;
- Information that may tend to compromise the safety or security of the public or public systems;

Content that violates a legal ownership of interests of any other party, such as trademark or copyright infringement;  
Violent or threatening content;  
Disclosure of confidential, sensitive, or proprietary information;  
Disclosure of Health Insurance Portability and Accountability Act Information;  
Disclosure of personally identifiable information;  
Disclosure of personally identifiable health information;  
Disclosure of social security numbers;  
Disclosure of Payment Card Industry Data;  
Identical posts by the same user or multiple users.

- 6.3.3 Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched.
- 6.3.4 When possible, content should always link back to the County's website for more information. All social media sites shall be created using an official Saginaw County email account.
- 6.3.5 Maintain the confidentiality of Saginaw County trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- 6.3.6 Authorized users should not provide the County's or another's confidential or other proprietary information. Ask permission to publish or report on conversations that are meant to be private or internal to Saginaw County.
- 6.3.7 Authorized users should not cite or reference clients, partners or suppliers without their approval. When a reference is made, link the reference back to the source if possible. Links should be to reputable and factual/accurate sources.
- 6.3.8 When a response to an online comment posted to the Saginaw County social media platform is appropriate, comments must be replied to in a timely manner. Please follow the Social Media Response Decision Guide (attached herewith and incorporated herein) before responding to a comment.

6.3.9 The Saginaw County brand standards will apply to using the County logo, nameplate, color scheme and visual identity.

6.3.10 Departments will:

6.3.10.1 Establish a well thought out social media work plan that complements countywide policies and considers the departments' mission and goals, audience, legal risks, technical capabilities, security issues, emergency response procedures, etc. The work plan shall be submitted to IT (work plan committee) for approval. Social media sites may not be established without an approved plan. Any social media site that is created without approval will be in violation of this policy.

6.3.10.2 Create, administer, and deactivate their social media accounts. Elected and Appointed Department Heads shall also establish appropriate usage levels including identifying what social media accounts individuals are approved to use, as well as defining roles.

6.3.10.3 Oversee and manage social media pages in use by staff. Social media content shall fully comply with all of the Saginaw County Personnel and IT Policies.

6.3.10.4 Designate and train authorized staff in proper use of social media. This shall include a Social Media Coordinator and a back-up Social Media Coordinator responsible for overseeing the Department's mission goals, objectives, audiences, and measures of success.

6.3.10.5 Monitor the access levels of consultants working with the department on social media.

6.3.10.6 Change social media logins and passwords every 90 days or immediately if authorized agents are removed as administrators and/or leaving Saginaw County employment.

6.3.10.7 Monitor and measure social media, analyzing effectiveness and making recommendations to the County for continuous improvement.

- 6.3.10.8 Provide Controller's Office/IT with up-to-date lists of social media pages, account logins and passwords and authorized users with their associated access levels. Account login and password information is required to be provided in case the Department's Social Media Coordinator or back-up Social Media Coordinator is unavailable to address an urgent matter and it must instead be addressed by staff from the Controller's Office or IT.
- 6.3.10.9 Ensure the department's social media sites are monitored daily. Prompt corrective action shall be taken when an issue arises that places or has the potential to place the County at risk. Social Media Coordinators and/or back-up coordinators shall review site activity and content daily for comments and misuse.
- 6.3.10.10 Department Directors shall notify the IT Department immediately in the case of termination of any employee with authorized use of social media.

6.3.11 Authorized users will:

- 6.3.11.1 Uphold brand standards and values when representing Saginaw County on social media. Saginaw County's social media sites shall be created and maintained with identifiable characteristics of an official County site. This includes: County logo and Department insignia(s).
- 6.3.11.2 Monitor social media sites daily and flag concerns when appropriate.
- 6.3.11.3 Ensure all social media sites display a link to the Saginaw County Social Media Policy.
- 6.3.11.4 Post within the scope defined in their Department's Social Media Plan and in compliance with all Personnel and IT Policies.
- 6.3.11.5 Receive pre-authorization for any work performed out of normal work hours, if hourly.

6.3.11.6 Notify IT of any security compromises and follow their documented procedures.

#### 6.4 Accepted Social Media Platforms

6.4.1 IT will retain a complete list of approved social media platforms to which other Departments and authorized users are able to post.

#### 6.5 Personal Employee Postings

Saginaw County respects the right of any employee to engage in on-line social networking during their personal time. While the County respects employees' privacy and right to free speech, as an employee, you are also viewed as a public facing municipal representative. The County recommends exercising good judgement and prudence as it pertains to the information you voluntarily put in the public domain. In order to protect the County's interest and ensure employees focus on their job duties, employees must adhere to the following rules and guidelines:

- 6.5.1 All employees are solely responsible for any personal postings they post online. Keep in mind that any of the posted conduct that adversely affects job performance, the performance of fellow employees or otherwise adversely affects members, customers, suppliers, people who work on behalf of Saginaw County or Saginaw County's legitimate business interests may result in disciplinary action up to and including termination. Employees should be respectful and avoid behavior identified in Section 6.3.2 along with avoiding using ethnic slurs, personal insults, or obscenity or engage in any conduct that would not be generally acceptable.
- 6.5.2 Think before you send. Always remember to think about what you plan to say and how you plan to say it before composing and distributing on-line. Once information is posted, it is difficult if not impossible to take it back.
- 6.5.3 Do not create a link from your personal blog, website or other social networking site to the County website.
- 6.5.4 Do not use your assigned Saginaw County email address to register on social networks, blogs or other online tools utilized for personal use.
- 6.5.5 Identify yourself and express only your personal opinions. You must make it clear that you are speaking for yourself and not on behalf of the County. Speech that appears to represent the County, even remotely, takes on the appearance of an official position statement and is not permitted in

any circumstance. Do not represent yourself as a spokesperson for Saginaw County. If Saginaw County is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of Saginaw County, fellow employees, members, customers, suppliers or people working on behalf of the County.

- 6.5.6 If you publish a blog or post online related to the work you do or subjects associated with the County, make it clear that you are not speaking on behalf of Saginaw County. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of Saginaw County.” Information relating to persons receiving services from the County must not be disclosed. The privacy rights of fellow employees must be honored.
- 6.5.7 Refrain from using social media while on work time or on County provided equipment, unless it is work-related as authorized by your Department Head and/or Supervisor or consistent with this Policy and the County’s Equipment Policy.
- 6.5.8 Employee must keep County confidential information confidential. Any statement, whether made on-line or through images, videos, or sound files related to or referencing the County’s products, services, operations, customers, vendors or other employees regardless of the media or form used must strictly comply with the County’s practices, policies and procedures.
- 6.5.9 Employees should be accurate, truthful and considerate in their posts. Be constructive, provide appropriate context and think about the impact of your comments on our customers, vendors, other employees or managers.
- 6.5.10 The internet is fully searchable, which means that anyone with an internet connection can find information. Be careful about posting personal information on-line. Personal information can include photos, addresses and telephone numbers, information about where or when you work, or anything that could compromise your safety or that of your co-workers.



- 6.5.11 Remember that possible legal ramifications exist. Individuals can be held legally accountable for comments deemed to be defamatory, slanderous, libelous, obscene or proprietary whether they pertain to the County, another organization or an individual person.
- 6.5.12 Social media postings can occasionally generate media coverage. If you are ever asked to make a comment, please contact the County Controller and seek permission before making a statement.
- 6.5.13 Employees should not “friend” or “follow” an individual currently receiving services from Saginaw County. This also applies to the individual’s caregivers or guardians.
- 6.5.14 Nothing in this policy is intended to infringe upon a County employee’s right to engage in activities protected under the National Labor Relations Act or other applicable law.
- 6.5.15 No County employee or applicant for employment shall be required to grant the County access to or disclose information that would allow the County access to that individual’s personal internet accounts, unless the employer is conducting an investigation or requiring an employee to cooperate in an investigation under any of the following circumstances:
- (a) If there is specific information about activity on the employee’s personal internet account, for the purpose of ensuring compliance with applicable laws, regulatory requirements, or prohibitions against work-related employee misconduct.
  - (b) If the employer has specific information about an unauthorized transfer of the employer’s proprietary information, confidential information, or financial data to an employee’s personal internet account.

## 6.6 Policy Violations

- 6.6.1 Employees must immediately report violations of this policy to their Department Head and/or supervisor.
- 6.6.2 All Department Heads and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination from employment or criminal prosecution in accordance with Saginaw County’s policies or applicable laws.

6.6.3 The County prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

7. ADMINISTRATIVE PROCEDURES:

8. CONTROLLER/CAO LEGAL COUNSEL REVIEW: The Controller/CAO has determined that this Policy, as submitted to the Board of Commissioners, contains the necessary substance in order to carry out the purpose of the policy. County Civil Counsel has determined that this Policy, as submitted, contains content that appears to be legal activities of the Saginaw County Board of Commissioners.

Approved as to Substance:

Approved as to Legal Content:

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Saginaw County Controller/CAO

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Saginaw County Civil Counsel

ADOPTED: April 16, 2019

Adapted from the Air Force Web Posting Response Assessment, Fire Force Public Affairs Agency – Emerging Technology Division, from the US Environmental Protection Agency response flow chart, and San Mateo County.

