

Departmental Use and Administration of Social Media

Objective:	To outline and encourage appropriate use and management of Social Media technologies for two-way communication with constituents, visitors, or other organizations related to Tompkins County programs and services.	Policy/Procedure Number:	01-52
Reference: (All applicable federal, state, and local laws)	Tompkins County Code of Ethics; Tompkins County Compliance Program; Administrative Policies 01-06 (Public Access to Records), 07-01 (Acceptable Use of County Information Technology Resources), 08-29 (Personal Conduct), 11-05 (Retention and Disposition of Records); New York State Archives, Records Management	Effective Date:	December 6, 2016
Legislative Policy Statement:	Tompkins County embraces Social Media as an appropriate and critical two-way communication strategy for County initiatives, services, programs, alerts, and organizational directives. Tompkins County departments should use social media as a tool to ensure that critical public information and services are advertised and in a sharable online format. Tompkins County recognizes that each department may use social media differently based on their audience and objectives, while recognizing that it is also representative of the Tompkins County and its values.	Responsible Department:	County Administration
General Information:	The use of Social Media by Tompkins County departments is encouraged and permitted only when a department has a clear intended purpose and strategy, and the ability to comply with supervision, management, and enforcement items as addressed in this policy. In particular, departments engaging in the use of Social Media services are responsible for account management, maintaining public records, information management, and information security risks associated with their use. Guidance on the use of Social Media by Tompkins County departments is offered by Tompkins County Administration and Tompkins County Information Technology Services. Departments retain the ability to define additional or enhanced Departmental Use and Administration of Social Media policies, guidelines, and procedures beyond the scope of those defined in this policy so long as they are no less strict.	Modified Date (s):	November 15, 2022
		Resolution No.:	256; 2022-232
		Next Scheduled Review:	November 2027

I. Definitions:

Administrator - An authorized Tompkins County official who creates the Social Media account and is responsible for account management, posted articles, direct messaging, and information that appears on a County social media account.

Comment - A response to a Tompkins County social media, and/or networking account content submitted by a commenter.

Commenter - Anyone who submits a comment for posting in response to the content of an article, social media content, and/or networking site content.

Critical Public Information - Information that is time-sensitive and may have an immediate impact on the public's health and/or safety or access to critical services including the ability to engage in democratic processes such as voting or employment opportunities performed by Tompkins County in an inclusive and equitable manner.

Direct Messages - Messages sent by or received on a Tompkins County Social Media site. These messages are typically sent directly between two parties or a limited group. Messages may include questions, sharing of content, or request

of the County or department employees.

Social Media - Any internet site or resource where the user helps determine content. A social media site allows its users to interact with the site's creator and with each other as contributors to the website's content, and social media tools are intended to facilitate interactive information sharing, interoperability, user-centered design, and collaboration.

II. Policy:

A. Prior to the decision to use Social Media, a Department Head or Advisory Board under the direct management of a department and established by the County, should first consider their target audience, site monitoring requirements, technical capabilities, legal risks, and records management practices.

B. Department Heads are responsible for determining which employees are authorized to access, use, or manage Social Media accounts and sites on behalf of the department and will be responsible for designating appropriate account management roles of employees who publish or edit content, or respond to comments or direct messages on County Social Media accounts.

C. Administrators and Commenters, when posting or updating content to Social Media accounts on behalf of Tompkins County, must represent the interests, opinions, or positions of Tompkins County, and not those that are personal in nature.

D. Content posted to County Social Media should be relevant to the target audience, contain actionable information, and include a link to more information on the department's or another relevant website. Any information posted to County Social Media should also be considered for publication on the department's website.

E. Department Heads, Administrators, and Commenters have an obligation to ensure that Critical Public Information is posted to County Social Media. If a department does not utilize Social Media accounts, they should coordinate with the Communications Director on use of the Tompkins County accounts to post Critical Public Information.

F. County Social Media accounts must contain visible brand elements that identify them as official Tompkins County accounts. Information on brand elements can be found in the Tompkins County Brand Guidelines, available on the Communications and Public Information web page. Among other items, this includes: displaying an official County seal(s), department brands, contact information, a link to department web site(s), and a link(s) to the main Tompkins County web site.

G. Department Heads are responsible for authorizing the creation, administration, and deactivation of Social Media accounts and these accounts shall only be shared with authorized employees who have been designated by a Department Head to fulfill the role of Administrator. County Social Media accounts must be created using an official County email account. Social Media Administrator passwords must be documented and maintained by a Department Head or designee. Accounts and/or passwords shall promptly be modified when an individual is no longer designated as an Administrator. When appropriate, the Communication Director should also have access to Social Media accounts as an Administrator.

H. The Administrator is responsible for monitoring the Social Media accounts and taking appropriate action when necessary to protect the site from the posting of “inappropriate” information, comments, and links.

I. Inappropriate posts may be subject to removal and commenters that publish such posts may be subject to removal. Inappropriate posts typically include, but are not limited to, the following 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, color, sex, gender identity and expression, sexual orientation, religion, age, national origin, alienage, disability, medical condition, military status, familial status, or any other status or category protected by law;
- Sexual content or links to sexual content;
- Conduct or encouragement of illegal activity;
- Content that violates the legal ownership interests of any other party; and
- Information that may tend to compromise the safety and security of the public, public systems, and County personnel, elected officials, appointed officers, and volunteers;
- Misinformation, disinformation, or other information intended to mislead or harm the public;
- Both negative and positive comments and content related to the performance of named County personnel; and
- Comments determined to be threatening by the County.

Administrators should consider whether a clarifying response is warranted before removal. Clarifying responses may be warranted when a commenter expresses confusion or poses a question relevant to a post or comment.

J. The content of Social Media accounts may be subject to records retention requirements under *Administrative Policy: 11-05 Retention and Disposition of Records*. Use and content of Social Media accounts shall be documented and maintained to the extent practical by the Administrator in an accessible format that tracks and preserves items that may be considered public record and possibly subject to disclosure under the New York State Freedom of Information Law (FOIL), or legal electronic discovery (e-discovery).

K. Departmental use of Social Media must comply with laws and procedures including, but not limited to, copyright, records retention, privacy laws, the Tompkins County Compliance Program, NYS Freedom of Information Law (FOIL), HIPAA (Healthcare Insurance Portability and Accountability Act), and HITECH (Health Information Technology for Economic and Clinical Health). Departments shall not disclose confidential or proprietary information on Social Media sites. Sharing of posted 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, and links.

III. Procedure:

A. Access to Social Media Site from the County Network

In order to provide access to Social Media sites and services, a Department Head must submit in writing to the Information Technology Services Department, a

request for the designated staff person(s) to be removed from the Social Media web-filtering restrictions, if such web-filtering restrictions have been implemented.

B. Centralized Inventory of All Tompkins County Social Media Sites

Each department utilizing Social Media must provide site and account information to the Tompkins County Communications Director for the purpose of maintaining a centralized inventory of all Tompkins County Social Media sites. This information must include at a minimum the department name, Administrator name(s), and links or information necessary to access County-managed Social Media content.

C. Disclaimer Regarding Inappropriate Information

Administrators may use the following disclaimer template for Social Media accounts. Departments should consult with the Communications Director to develop department-specific disclaimers to meet the department and County's needs. Accounts shall inform Commenters of the intended purpose of the site and provide a clear statement of the topic introduced for discussion so that the public is aware of the limited nature of the discussion.

“Tompkins County and its departments reserve the right to remove comments or commenters that make inappropriate posts. Inappropriate posts include those that are threatening, unrelated, profane, discriminatory, sexual, illegal, mal-intended, or personally directed at named County personnel. Policy and procedure regarding removal are stated in the Tompkins County *Departmental Use and Administration of Social Media Policy (01-52)*, found in the Administrative Policy Manual.”

D. Site Monitoring

Departmental Social Media pages shall be monitored daily, and prompt corrective action shall be taken when an issue arises that place, or has the potential to place, the County, staff, or members of the public at risk.

1. A department that allows the public to post comments, links, or material directly onto the department's Social Media pages shall verify that the postings are appropriate on an ongoing basis. Such site activity and content shall be reviewed daily for possible exploitation or misuse. Posts deemed harmful or inappropriate by the County shall be handled in accordance with this policy (also see section II.H of this policy).
2. If a comment or post tagging a County managed Social Media account by a member of the public includes (but not limited to) inappropriate or threatening information or language, the Administrator must record and save or archive the comment and immediately notify the Department Head. The comment(s) and/or commenters must be removed as soon as possible (also see section II.H and II.I of this policy). The Administrator or Department Head may also wish to consult with the County Attorney and/or County Administrator if there are liability concerns.
3. Monitoring may occur by checking pages on a frequent basis or setting notification preferences so that the Administrator is notified.

E. Tompkins County Brand Guidelines

Graphics and information posted to Departmental Social Media pages should adhere to the Tompkins County Brand Guidelines available from the Communications Director or on the County's website.

F. Archiving Social Media

Content on social media accounts may be required to be kept for the full length of the related records retention period (see *Policy 11-05: Retention and Disposition of Records*). The content may fall under existing records retention requirements, including those covering:

- press releases;
- meeting recordings or minutes;
- annual reports; or
- staff directories.

If such items are retained elsewhere as the department's official copy, then the versions posted to social media need not be kept.

However, if the social media content is the sole official copy, it should be retained according to applicable records retention requirements. Citizen comments may also be considered records and covered by retention requirements for information or service requests.