



ADMINISTRATIVE PRACTICES MANUAL

SUBJECT: SOCIAL MEDIA

1. PURPOSE

It is the policy of Dane County for its employees who use social media for business purposes to be professional and only post material congruent with Dane County authorized views and opinions.

2. POLICY STATEMENT

"Social Media" is broad term that encompasses a continually expanding ecosystem of platforms. While the platforms are similar, each is unique in terms of how data is stored and the nature of the communications.

It is impractical to create a comprehensive policy that addresses all possible issues on every available platform given that these platforms are always evolving.

The following policy attempts to describe practices that Dane County Department of Administration prohibits as well as provides a list of best practices for social media posting guidelines.

Dane County also recognizes that many of its employees may engage in some form of social media while using Dane County equipment. Employees' online activities while using Dane County equipment is covered in the **Proper Use of Computer Equipment, Software, and Connectivity** of the Administrative Practices Manual.

3. GUIDELINES FOR DANE COUNTY EMPLOYEES' PERSONAL USE OF SOCIAL MEDIA

- 3.1 Employees may not make social media posts on behalf of the Dane County unless specifically authorized by a department head (see Section 4). Dane County employees should not use their official County e-mail address in conjunction with a personal social media site, nor may the Dane County seal or Department logos be used.
- 3.2 Dane County Civil Service Rules require employees to use good judgment and to show respect for co-workers and the individuals served. Dane County employees in a leadership role (such as department heads, managers/supervisors, and staff who provide information to the public) have a higher obligation regarding the use of good judgment and showing respect for the people whom Dane County serves. It should be assumed that Dane County staff and members of the general public may read any and all social media posts, and care should be taken not to publish personal thoughts in way that implies an official Dane County position. If information is present that identifies an individual as a Dane County employee, it must make it clear that anything posted is representative of a personal views or opinions, and not necessarily the views and opinions of the Dane County.
- 3.3 Dane County employees should be careful not to disclose confidential or proprietary information on social media.
 - 3.3.1 Per the **Dane County HIPAA Communication** policy, employees in covered components are discouraged from communicating with clients/patients through

any social media platform or instant messaging forum (Facebook, Instagram, Snapchat, TikTok, WhatsApp, Twitter, Wink, etc.).

- 3.3.2 If a Dane County employee receives any protected health information (PHI) or personally identifiable information (PII) via any social media platform, a copy of the message should be transferred into the client/patient file, and the message deleted from their device. Dane County employees should also notify the client/patient that further transmission of any PHI/PII should be done utilizing another method of communication.

- 3.4 Dane County employees should not be communicating on a personal social media account while engaged in County business (i.e., while attending committee meetings, etc.).

4. GUIDELINES FOR DEPARTMENT HEADS REGARDING THE ADMINISTRATION OF SOCIAL MEDIA

Each Department head is responsible for authorization and administration of Departmental social media sites. If a department head decides social media is an appropriate way to communicate; then the department head may choose to implement a department-specific policy and procedure. The following are minimum requirements:

- 4.1 Official Dane County (department) accounts should be "Verified Accounts." In general, social media platforms have a no-cost process by which government representatives can submit certain information to the provider to verify a user's identity. Verified accounts are desirable because it assures the public that the information being viewed/followed comes from the government official/office.
- 4.2 The Dane County Department heads should designate someone who will be responsible for administration of the department's social media sites and accounts.
 - 4.2.1 The administrator should create and maintain a process for employees wishing to create a social media site or account for the benefit of the Department.
 - 4.2.2 The administrator should maintain a list of all the Department's social media account names and passwords.
 - 4.2.3 The administrator should create and maintain a process to review the content of Department social media applications.
 - 4.2.4 The administrator should ensure that the Department meets its responsibilities regarding collection and records retention including preservation of social media content.
 - 4.2.4.1 Dane County Departments must ensure that records are maintained in an accessible and usable format that preserves the integrity of the original records for the period designated by appropriate records retention schedules.
 - 4.2.4.2 Dane County Departments must retain all content and data posted on official County social media accounts for seven (7) years, including any comments, queries, information, or materials submitted by end-users.
 - 4.2.4.3 Dane County Information Management uses ArchiveSocial where supported to archive and maintain records of Dane County's social media activity for seven (7) years; please contact the HelpDesk to connect new or existing accounts.

4.3 The Department head (or designee) should determine the target audience and the content of the social media site or account. For example, the Department head (or designee) should determine:

- 4.3.1 How the Department will maintain security of confidential information, including but not limited to protected health information (PHI) or personally identifiable information (PII) of others;
- 4.3.2 How the Department will ensure communications do not involve posting of copyrighted content without the copyright holder's express permission; and
- 4.3.3 How the Department will ensure its social media does not host inappropriate content; "inappropriate content" including but not limited to ethnic slurs, personal insults, obscenity, and also proper consideration of privacy, using Dane County social media for political purposes, and making unofficial posts, tweets or messages that the public will interpret as official messages.

4.4 The Department head (or designee) should include a disclaimer that makes it clear that Dane County is not responsible for information posted by users to the site. The disclaimer should include contact information for requesting removal of objectionable content. An example of such a disclaimer is as follows:

This page is produced and maintained by Dane County. We expect participants will respect each other and we reserve the right to remove any inappropriate content and/or content we deem in violation of applicable law. This page is not open to the promotion or advertisement of a business or commercial transaction. Dane County does not endorse or support opinions or views expressed by users of this page and links to other Internet sites should not be construed as an endorsement of the views contained therein. Dane County does not guarantee that external websites comply with the ADA. Please contact (website) to request removal of infringing materials.

4.5 Other Requirements:

- 4.5.1 Dane County employees must create the official County(department) social media account using a Dane County email address. Dane County employees should never use a personal or campaign email address to create an official County social media account. Ideally, they should use a generic county email address for their department.
- 4.5.2 Accounts should either (a) permanently block all public posting/comments/tagging OR (b) always allow all public postings/comments/tagging.
- 4.5.3 Dane County Departments should not delete a post simply because Dane County disagrees with the viewpoint expressed. Doing so may violate the poster's First Amendment rights.
- 4.5.4 Dane County Employees shall consider citing sources and providing links when referencing a law, policy or other website.
- 4.5.5 No employee may use a County social media site or account to engage in private business activities, personal commentary, or political activities.
- 4.5.6 Given that all social media sites can be hacked and/or may sell data to third-parties, Dane County employees and elected officials should limit the disclosure of private or sensitive personal information about themselves, others, or the County on any website, social media platform, or via email.

4.6 The following content is acceptable for an official County social media account:

- 4.6.1 Discussions of County issues and how they might be addressed through Board action;
- 4.6.2 General information about County Board activity such as ordinances or resolutions;
- 4.6.3 Budget information;
- 4.6.4 Newsletters from the Elected Official's office;
- 4.6.5 Publicizing public events;
- 4.6.6 Publicizing County-related events (for example, Henry Vilas Zoo events or LWR events hosted by "friends of parks" groups, etc.);
- 4.6.7 Hyperlinks to official County-related websites or webpages, or other official County related social media accounts;
- 4.6.8 Public service announcements; and
- 4.6.9 Use of County-owned logos, seals or images.

4.7 The following content is unacceptable for an official County social media account:

- 4.7.1 Solicitation of campaign contributions;
- 4.7.2 Promotion of campaign-related events;
- 4.7.3 Photos of campaign-related events;
- 4.7.4 Photos containing campaign-branded material such as T-shirts, signs, or banners;
- 4.7.5 Posting any communications that a reasonable person would consider to be campaigning;
- 4.7.6 If a campaign donor or voter contacts an Elected Official on one of the Elected Official's "official" County social media accounts to talk about fundraising or anything about an election or campaign, the Elected Official may not respond in any way on the "official" County account, or the Elected Official will risk potentially committing state and/or local law campaign finance and/or ethics violations.
- 4.7.7 Posting any content that is strictly personal or commercial such as promoting the Elected Official's own business or business with which the Elected Official is associated;
- 4.7.8 Posting any content regarding non-County-related charitable organizations or causes that the Elected Official is involved in (i.e., please attend "save the owls" event);
- 4.7.9 Solicitation of charitable contributions for non-County-related charitable contributions (i.e., please donate to my church/synagogue/mosque, please buy my daughter's Girl Scout Cookies, etc.);
- 4.7.10 Advocacy for issues if a reasonable person could conclude that the Elected Official could benefit personally because of that advocacy;
- 4.7.11 Aid advertising is strictly forbidden (i.e. where an advertiser pays the Elected Official to advertise);
- 4.7.12 Advertising or promotional materials for organizations or businesses affiliated with the Elected Official are strongly discouraged;
- 4.7.13 Prurient, obscene, objectionable, offensive, libelous, slanderous, defamatory, violent, threatening, discriminatory, harassing or otherwise objectively harmful content;

- 4.7.14 Exchanges between any Dane County Officials about official County business;
- 4.7.15 Personally identifiable information (i.e., addresses, phone numbers, personal email addresses, social security numbers, etc.) about other elected officials, employees, or members of the public;
- 4.7.16 Anything that a reasonable person would consider to be a malicious or ad hominem attack or a threat directed at an individually-identifiable employee;
- 4.7.17 Confidential, proprietary or highly sensitive information that relates to Dane County or department operations (or County vendors);
- 4.7.18 Content that impairs or inhibits the appropriate functioning of government;
- 4.7.19 Hyperlinks to websites, webpages, or other social media accounts containing any of the content described above;
- 4.7.20 A third-party's trademarked or copyrighted intellectual property (i.e., logos, seals, music, photographs, images, etc.); and
- 4.7.21 Avoid "tagging" or commenting on the personal accounts of third-parties or on any campaign-related social media accounts.

5 CONSEQUENCES FOR NON-COMPLIANCE

- 5.1 Dane County will investigate complaints regarding the use of social media on a case-by-case basis. In addition, an employee's failure to comply with this policy may result in progressive discipline, up to and including termination of employment.

END OF POLICY