



Clinton County

Clinton County Social Media Policy

PURPOSE & OBJECTIVES

This Social Media Policy (“Policy”) sets guidelines for the establishment and use of social media by Clinton County (“County”) as a means of conveying County information to the public. The intended purpose behind the use of Clinton County social media sites is to disseminate information from the County, about the County, to the public in a civil and unbiased manner.

This policy also sets guidelines for conduct and social media use by County employees and officials who use social media to interact with customers on behalf of Clinton County.

The County’s official website, located at clintoncounty-ia.gov, will remain the County’s primary online source for communicating information to the public; however, a social media presence is yet another way government can communicate to the broadest audience of those it serves. Therefore, Clinton County will use social media as an additional tool to provide information about the County’s mission, programs, services, activities, events, and brand identity directly to users and to help meet the following objectives:

- Support the County’s mission.
- Provide accountability to the public and transparency of government
- Provide accurate and timely information to all audiences
- Communicate news and emergency information
- Establish two-way communication with residents and persons interested in Clinton County
- Create additional marketing/promotional channel to increase awareness of County messages, programs, services, activities, achievements, and significant events
- Humanize County government
- Build trust through quality content
- Collect valuable feedback
- Reach additional demographics and diverse audiences
- Create a more informed, engaged, and responsive community

Information posted on County social media sites will supplement, and not replace, required notices and standard methods of communication.

The personal use of social media can have bearing on County personnel in their official capacity. As such, this policy provides information of a simply precautionary nature as well as prohibitions on the use of social media by County personnel

SCOPE

This policy applies to any pre-existing or future social media accounts created by County employees for Clinton County business and the terms with which the public is encouraged to interact with the County on social media.

This policy also applies to all full-time, part-time, seasonal, and temporary Clinton County employees who report to the Board of Supervisors, County Elected Officials, staff of County Elected officials, employees who report to the Conservation Board, Public Health, and Clinton County advisory board and commission members.

DEFINITIONS

Authorized Agents(s): Users authorized to manage the content on the County social media sites as well as receive content posted to the site by the public. See Appendix C.

Blog: A self-published diary or commentary on a particular topic that may allow visitors to post responses, reactions or comments. The term is short for “Web Log.”

Clinton County Chief Security Officer: Per Clinton County HIPAA Policy; the Director of Information Technology.

Comment: Response to County social media site submitted by the public.

Communications Department: The Communications staff under the Board of Supervisors | Communications division.

Content: Content includes, but is not limited to, information, photographs, videos, and hyperlinks.

Elected or appointed official: For the purpose of this policy, elected and appointed official refers to any person currently elected or appointed to the Clinton County Board of Supervisors; or the Offices of the County Attorney, Auditor, Recorder, Sheriff, or Treasurer and their deputies; or a County advisory board or commission.

Follower: An individual or agency who “likes” or follows any County social media page.

Internet: An international network of independent computer systems. The World Wide Web is one of the most recognized means of using the Internet.

Official County website means the website clintoncounty-ia.gov that is under the control and management of the IT Department.

Page: The specific portion of a social media website where content is displayed and managed by an individual or individuals with administrator rights.

Photo sharing: The online publishing of photographs with the ability to transfer and share the photos with others.

Post: All-inclusive term to describe a message, announcement, picture, video, or any other form of communication posted on County social media sites.

Profile: Information that a user provides about himself or herself on a social networking site.

Social Media: A form of online communication or publication that allows for multi-directional interaction. Social media includes, but is not limited to, blogs, podcasts, social networks, photograph and video hosting websites, and new technologies as they evolve. This includes, but is not limited to, social networking sites (Facebook, LinkedIn, Nextdoor, Twitter), photo- and video-sharing sites (Flickr, YouTube, Tik Tok, and Pinterest), blogs, and news sites (Digg, Reddit).

Social Networks: Online platforms where users can create profiles, share information, and socialize with others using a range of technologies.

Speech: Expression or communication of thoughts or opinions in spoken words, in writing, by expressive conduct, symbolism, photographs, videotape, or related forms of communication.

Tagging: Identification of an individual or organization's profile or page in a post or photo that links the post or photo to the individual or organization's profile or page.

Video sharing: The online publishing of videos with the ability to transfer and share them with others.

POLICY

A. General Policy

1. It is the policy of Clinton County to ensure that County social media sites are created and maintained for exclusive use by the County in communicating information relevant to the County's purpose and goals; and to document the Terms of Use that govern the usage of the County's social media sites. The County reserves the right to determine what information may and may not be placed on County social media sites.
2. The County's official website clintoncounty-ia.gov will remain the County's primary and predominant internet presence for official information.

3. The County will have a “page” in Facebook, not a “group.” Facebook pages offer distinct advantages, including greater visibility, customization, and measurability.
4. Content posted to social media sites must contain links directing users back to the County's official website for in-depth information, forms, documents, or online services necessary to conduct business with Clinton County when applicable.
5. The County reserves the right to implement or remove any functionality of its social media sites, when deemed appropriate by the Board of Supervisors or their designee. This includes, but is not limited to, information, articles, pictures, videos or any other form of communication that is posted on a County social media site.
6. County social media sites or equipment may not be used by employees or appointed or elected officials as a platform for private business or charitable activities, commercial or personal transactions, or for any other purpose prohibited by law.
7. Communications made through a social media site will in no way constitute a legal or official notice or comment by or to any official or employee of the County for any purpose. For example, a social media post or comment made by a member of the public related to a request for a permit or absentee ballot request will not be considered by the County. Comments or requests specific to a County license, application, permit, project, etc. should be submitted directly to the appropriate County official, department, or division as indicated at ClintonCounty.org. Threats made on social media to the County or staff will be punishable to the full extent of the law.
8. Clinton County social media accounts are subject to public records laws. Any content maintained in a social media format that is related to County business, including a list of subscribers and posted communication, is a public record. The Department maintaining the social media account is responsible for responding to any public records request for public records on social media.
9. All social media accounts maintained by the County must adhere to applicable federal, state and local laws, regulations, and County policies including all policies relating to the use of computers and security, electronic communications, workplace discrimination, County records management, County HIPAA policies, and any other applicable County policy or procedure.

B. Requirements for County-Sponsored Social Media

1. Any additional County social media accounts are subject to approval by the County Chief Security Officer. Departments must provide specific reasons for the need to have separate social media accounts and how those accounts will be maintained and monitored. If approved, the Chief Security Officer or designee, will periodically review each account. Accounts that do not meet the County's expectations set forth in

HIPAA policy “PR-255: Employee Use of Social Media” and this policy, may be subject to removal at the direction of the Chief Security Officer.

2. County social media accounts must make clear that they are maintained by Clinton County. Clinton County approved logo or branding must be used on all County social media accounts to confirm authenticity of the site. Each County social media account must identify the County name, state, and department. The social media account must also state that it is the “official” account for the department or County.
3. Only designated staff members (authorized agents) shall have access to post content to County social media accounts. Department directors or their designee are responsible for designating which employees are authorized to post on their department’s behalf and for maintaining a current list of authorized agents for their department and for providing a current list of authorized agents to the Communications Director. See Appendix C.
4. Departments that maintain their own social media accounts are responsible for creating and maintaining timely and accurate information or content thereby helping to advance the County’s vision, mission, and goals and inform and educate the public about County programs, services, activities, and events.
5. Replies to posts and monitoring accounts will be done during normal working hours; exceptions may include emergency situations, weather-related events, or special events occurring outside normal business hours. Every effort should be made to reply to comments or questions within 24 hours (during the standard work week) when a response is warranted.
6. When responding to comments on social media, the name of the page should be used to respond to comments. When appropriate, direct the comment to the County’s website or provide a department phone number and/or staff member number and email to contact for more information.
7. Social media accounts should state that the opinions expressed by visitors to the page(s) do not necessarily reflect the opinions of the County or the department, that comments will be monitored, and that content posted or submitted for posting is subject to public disclosure.
8. Authorized agents will limit the number of posts, photo albums, and status updates each day. In the event of a severe weather event, crisis, or emergency, County social media accounts may post as many updates as warranted.

C. Content Standards

1. All content posted to County social media accounts must be County-specific; or support a Clinton County departmental, divisional, or program initiative, service, or

- responsibility; or support an organization or event that Clinton County partners with, funds, or sponsors.
2. The County shall not violate any trademark or copyright laws by ensuring it has full permission or rights to any content before it is posted by the County, including photographs, videos, and music.
 3. Content written will be a reflection of the County voice and not an individual employee. Do not use “I” language. Use of “We” and “Our” language is encouraged to meet Clinton County’s goal of a personalized and conversational tone on social media.
 4. Postings must contain information that is freely available to the public and not be confidential as defined by any County policy or state or federal law.
 5. Postings may NOT contain any personal information, except for the names of employees whose job duties include being available for contact by the public, without consent of the individual.
 6. Clinton County has no control over content, commercial advertisements, or other postings produced by the social media site that appear on the Clinton County social media account as part of the site’s environment.

D. Professional Use of Social Media

1. Employees representing Clinton County on the County’s social media accounts must conduct themselves professionally and in accordance with this policy at all times as representatives of the County. Employees who fail to conduct themselves in an appropriate manner shall be subject to discipline according to County policy up to and including termination of employment.
2. Employees are responsible for any content they publish on any social media site.
3. County social media accounts may not be used by any County employee or representative for the purpose of expressing personal views.
4. Hourly employees should not work on social media after hours without prior approval. This is considered overtime, and failure to obtain prior authorization may be cause for corrective action.
5. If an employee makes a factual mistake on a County’s social media account, they should correct it as soon as possible. Corrections should be upfront and timely. Do not try to “hide” corrections, as someone may have seen the incorrect information and may be acting upon it.

6. Authorized agents for Clinton County's social media accounts and their department director or designee must sign the Social Media Policy Acknowledgement and Authorization Form (Appendix C). Department directors/designees are responsible for providing the Director of Information Technology with the signed Acknowledgement and Authorization Form.

E. Personal Use of Social Media

1. The County recognizes that many individual employees use social media outlets for their own personal use. This policy does not extend to individual employees accounts, except that employees may be subject to disciplinary action for internet postings that could impair the public's confidence in the operation of County government or the performance of the individual employee.
2. Personal accounts may not be designed in such a way as to cause users to believe the account is County-administered or endorsed by the County, including unauthorized use of County logos.
3. Employees should consider whether statements they publish may be construed as expressing official Clinton County positions and whether or not such statements are accurate representations. If an employee possesses leadership responsibilities or chooses to identify themselves as a Clinton County employee when conducting personal social media activities, employees should ensure that personal communications represent personal opinion and not the opinion of Clinton County. To ensure an employee's personal communications are not wrongfully attributed to Clinton County, employees may post a disclaimer such as:
 - a. Twitter bio: Tweets are my own.
 - b. Facebook or blog bio: Postings on this site are my own opinion and do not reflect or represent the opinions of Clinton County, for which I work.
4. Whether or not you specify on your personal social media accounts that you work for Clinton County, your employment with the County is public record. Whenever you discuss issues online, whether in a personal or professional capacity, it is possible your comments can be tied back to your employment with Clinton County.
5. Employees and appointed and elected officials have a First Amendment Constitutional right to comment on matters of public concern. However, comments may not violate the County's harassment or discrimination policies.
6. While personal pages are your property, information posted online is never truly confidential. There is no expectation of privacy to items posted on the internet to any site and for any reason. Employees will be responsible for their own comments.

7. Connections with County-administered accounts are permitted. Employees and appointed and elected officials can like and share events and postings to promote the County.
8. Posting confidential or legally protected information learned through employment with Clinton County on personal social media pages is grounds for immediate termination and may subject the poster to state and federal law liability.
9. Posting of HIPAA protected information is not permitted. See Clinton County HIPAA policy “PR-255: Employee Use of Social Media”.
10. Employees may not use social media to engage in libelous, defamatory, obscene, or maliciously false behavior directed at the County, County departments, elected officials, appointed officials, other employees, or members of the public. Postings of this nature could be subject to discipline.
11. Employees should not speak on behalf of the County using their personal social media accounts.
12. This policy does not govern personal use of social media during work hours as this behavior is addressed in the Clinton County IT Policy.
13. Employees are discouraged from posting to personal accounts while using the Clinton County network or Clinton County-owned equipment.
14. When violations of these guidelines occur, the County reserves the right to exercise judgment in determining the appropriate level of discipline by reviewing each incident on a case-by-case basis. Failure to follow this Social Media Policy may result in disciplinary action up to and including termination.
15. Nothing in this policy shall be interpreted or applied as limiting an employee’s right to engage in speech protected by the United States and Iowa Constitutions or as limiting the right to engage in protected concerted activity, including employee discussion regarding the terms and conditions of employment, the employee right to make a complaint of discrimination or other workplace misconduct, or to express an opinion on a matter of public concern.
16. Social media is not a forum to articulate work environment complaints. All applicable work-related complaints must originate with the department manager or the Clinton County Human Resources Department.

F. Comment Policy

1. As a public entity, Clinton County must abide by certain standards to serve all its constituents in a civil and unbiased manner. Clinton County requires that all posts to

its social media pages must adhere to the individual platform's Community Standards Rules and expressly reserves the right to remove or block submissions that contain:

- a. Profane, vulgar, or obscene content;
 - b. Content that promotes, fosters, or perpetuates discrimination on the basis of sex, color, race, religion, national origin, age, physical or mental disability, sexual orientation, gender identity, veteran or any other protected group status;
 - c. Sexual content or links to sexual content (other than educational);
 - d. Personal attacks or defamatory comments;
 - e. Threats to any person or organization;
 - f. Comments in support of, or in opposition to, any political campaigns or ballot measures;
 - g. Solicitation of commerce and advertisements;
 - h. Conduct or encouragement of illegal activity;
 - i. Information that may tend to compromise the safety and security of the public or public systems;
 - j. Content that violates a legal ownership interest, such as a copyright or trademark, of any party;
 - k. Harassment or content which constitutes and/or facilitates stalking;
 - l. Content which violates the right to privacy or contains confidential information; or
 - m. Encouragement of violence.
2. The County reserves the right to restrict or remove any content that is deemed in violation of this policy or any applicable law after consultation with the Chief Security Officer, the Chief Privacy Officer (HR Director) and the Clinton County Attorney's Office or outside Council. Any County department that removes content based on this policy or laws will complete the Content Removal Tracking Form found in Appendix B that captures the time, date, and identity of the poster, when available. The department removing the content is responsible for retaining the removed content in accordance with the County's policy on the retention of such information.

Departments must also submit a completed copy of the Content Removal Tracking Form to the Chief Security officer.

3. When a person's comment is removed, the County should post a reason for removing the comment (i.e. "A comment to this post was removed because it promoted discrimination of a protected class. This is in violation of the County's comment policy.").
4. Although Clinton County encourages posts and comments on social media sites managed by the County, the sites are **limited public forums** and are moderated by County staff. The County reserves the right to deactivate the comment feature on County-affiliated social media sites, where applicable, at any time without prior notice.
5. A comment posted by a member of the public on any Clinton County social media site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of, or agreement by Clinton County, nor do such comments necessarily reflect the opinions or policies of Clinton County.
6. All comments posted to any Clinton County social media site are bound by the site's Terms of Service/Policies and Clinton County reserves the right to report any violation of a site's Terms of Service/Policies with the intent of the platform taking appropriate and reasonable responsive action.
7. All users must adhere to applicable federal, state and local laws, regulations and policies.
8. See Appendix A for guidance on when and how County authorized agents should respond to comments.

G. Elected Officials and Officials Appointed to County Boards, Commissions, and Committees:

1. For the purpose of this policy, the term "elected and appointed official" refers to any person currently elected or appointed to the Clinton County Board of Supervisors; or the Offices of the County Attorney, Auditor, Recorder, Sheriff, or Treasurer and their deputies; or a County advisory board or commission.
2. Officials interacting with any of the County's social media sites must comply with applicable federal, state, and local laws, regulations, and policies. This includes adherence to established laws and policies regarding copyright, records retention, the Open Records law, First Amendment, and privacy laws.

3. Elected and appointed officials are representatives of the County and should conduct all communications on social media in a professional manner.
4. Elected and appointed officials must exercise caution in using personal or professional social media profiles or pages to discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the County (or any commission, board, or committee of the County), as such responses may create a “meeting” in violation of the Open Meetings law.
5. Adding to a post or comment that would create a quorum of the group you represent should be strictly avoided. (If the comment or posting requires official review it should be handled before the group during a public meeting.)
6. Elected officials should not use social media as a mechanism for conducting official County business other than to communicate informally with the public.
7. Elected officials should be sure that efforts to be transparent do not result in sharing non-public information related to employees, personnel data, medical information, claims or lawsuits, or other non-public or confidential information.
8. To help prevent errors and liability issues, officials are encouraged to ask the appropriate staff person or department to post official County documents (i.e., an ordinance recently passed by the Board of Supervisors), rather than summarizing such documents themselves. If an elected official makes a mistake, it should be corrected as soon as the official is made aware of the error. Corrections should be upfront and as timely as possible. If you modify an earlier post, make it clear the posting has been corrected. Consider designating corrections with “Fixed link” or “Fact correction” prior to the correction.
9. Elected and appointed officials who choose to have a social media page or profile that identifies their office, should include the verbiage “Content on this site does not represent any official position of Clinton County, only that of (NAME) in (THEIR) personal capacity.”
10. County staff will not set-up or administer a County-run social media account for an elected official.

H. External Links, “Following” of Other Accounts and Sharing Posts

1. It is the County’s policy to limit external links and the entities either “liked” or “followed” to:
 - a. Other government agencies;
 - b. Elected officials;

- c. Local and national media sites;
 - d. Links to corporate or company sites that provide web-based automated solutions specifically designed for use by the County and/or the public through the County website;
 - e. Nonprofit and nonpartisan organizations related to the County mission or functions;
 - f. Organizations in a direct contractual relationship with the County, that receive funding in the form of either monetary or in-kind contribution from the County;
 - g. Links that support the County or an individual department's mission to meet the cultural, educational, health, safety, welfare, or informational needs of followers;
2. County social media accounts shall only share pages/links/posts or tag other social media profiles when:
- a. The content is from another government agency; or
 - b. The page/link/post is from an organization that the County is collaborating with or funds and the content is related to that specific collaboration; or
 - c. The page/link/post contains reference to Clinton County; or
 - d. The page link post is from a media source and the topic supports Clinton County's mission or function.

I. Accessibility

1. It is the County's goal to provide maximum access for all users of the County's social media sites. Departments using social media will use reasonable efforts to ensure that persons with disabilities may have access to Clinton County's social media presence. If the Communications Department learns that a social media provider offers an accessible tool, the department will identify that alternate version on the County's website to inform users that the tool is available.

J. Accuracy and Timeliness

1. Clinton County will make every effort to ensure the accuracy of information provided on the County's social media pages. However, several factors that are beyond the

County's control (including unauthorized modification of electronic data, transmission errors, browser incompatibilities, cached information, or other aspects of electronic communication in an evolving and time sensitive environment) can affect the quality of the information displayed on the site.

2. The County's timeliness about posts and responses to comments may also vary based on staff availability.

K. Disclaimer

1. County social media accounts will include a link to Clinton County's Social Media Sites Terms of Use.
2. When space is permitted, a disclaimer that includes some or all of the following language will also be posted on the social media account:
 - a. Clinton County social media pages are informational in nature and are not designed to handle official requests or notices from the public. All requests and notices to Clinton County must be made through the applicable County department.
 - b. NOT report emergencies on any County social media sites. County social media sites are not monitored 24 hours a day, seven days a week. In case of an emergency, dial 911.
 - c. By using this site, you agree to abide by Clinton County's comment policy and Terms of Use. Please note that comments will be monitored by County staff during the County's normal business hours to ensure that posted comments are suitable for all readers while respecting a range of opinions and points of view. We will reply to comments in a timely manner when a response is appropriate. We reserve the right to hide or delete comments that violate the Terms of Use. Any content posted or submitted for posting is subject to public disclosure.
 - d. The opinions expressed by visitors to the page(s) do not necessarily reflect the opinions of the County or any individual department. Clinton County does not endorse any product, service, company, or organization advertising on social media. The ads that appear on social media platforms are sold, posted, and maintained by the individual corporations.

L. Social Media Sites Terms of Use

A link to the County's social media sites Terms of Use must be posted on all County social media sites.

PRIVACY, HIPAA, AND SOCIAL MEDIA

The Clinton County HIPAA policy PR-255 Employee Use of Social Media must be upheld by all Clinton County Department Heads, Elected Officials, and Staff. This policy can be found in the Clinton County, Iowa HIPAA Master Manual.

Adopted: October, 7 2020

Appendix A

Responding to Comments

In cases where comments are automatically posted, the authorized agent (staff member) responsible for the page must monitor the site and respond in a timely manner when appropriate.

Guidance on When/How to Respond to Comments:

If the person has a question – Respond in a timely manner with information or point them back to the County’s website or appropriate resource. Chances are, if one resident has a question, others may be interested in the answer as well. You may ask them to contact you offline when appropriate (when it is a private issue, when the issue is one in which there is little or no interest by others, etc.).

If the person has a complaint – If inaccurate, politely correct inaccuracies. When a general complaint and when deemed appropriate, thank them for sharing feedback and direction that may be needed. If it is regarding a personal matter, reply that you would like to address the issue offline and provide contact information.

If things get negative – Acknowledge the commenter’s complaint and invite them to contact a specific person at Clinton County for an offline discussion. Example: “We’re sorry you’re having this problem, and we want to help. Please reach out to (insert specific staff person’s name) at Email: firstname.lastname@clintoncounty-ia.gov or 563-XXX-XXXX.” This shows your followers that you are responding. Providing contact information for a specific person says Clinton County sincerely wants to discuss and/or resolve the issue. It is not appropriate to engage in arguments with members of the public who may be critical of your department or the County. It may be appropriate to direct the commenter to a customer satisfaction survey if the department uses such surveys.

If the person leaves a general comment, like “This is a great project” or “We look forward to completion of the project,” a response or “Like” is recommended. Positive comments are then pushed to the top for other users to see.

If the person is looking to begin a debate, take the conversation offline. Do not debate them on the site. It is ok to correct inaccuracies and to provide evidence to support information, but avoid debates.

Staff may use their discretion when responding to a post that may be considered passive aggressive, antagonistic, posts previously answered or posts that have multiple comments that need addressed. Staff may choose to respond, or no response may be required, depending on the nature of the post.

When in doubt on how to respond to a comment, please contact the Communications Department for guidance.

Appendix B

**CONTENT REMOVAL TRACKING FORM:
ARCHIVE REMOVAL OF INFORMATION FROM SOCIAL MEDIA SITES**

Today's Date:

Date comment was posted:

Date comment was removed:

Employee who removed the comment:

Social media account removed from:

Reason for removing the comment:

Which comment policy does the comment violate?

Attach screen shot of conversation or post or insert image below:

Appendix C

Social Media Policy Acknowledgement and Authorization Form

Clinton County departments that have social media accounts may authorize staff to post and manage content on the Department’s social media account(s). These staff members are known as Authorized Agents in Clinton County’s Social Media Policy. The selection and number of Authorized Agents is determined by the Department Director or designee.

Authorization

I hereby give approval for Employee _____
(print employee name here) to serve as an Authorized Agent for the following Clinton County social media account(s):

_____.

I have read Clinton County’s Social Media Policy and Terms of Use and have provided Employee a copy of the Social Media Policy and Terms of Use.

By signing this document, I am stating that I have read and understand Clinton County’s Social Media Policy and Terms of Use and agree to abide by them.

The Department Head or Designee must return this signed form to the Communications Director.

Department Name

Department Head or Designee Date

Employee / Authorized Agent Date

