

Policy Cover

Title: Social Media Policy and Procedures	Effective Date: March 20, 2018
	Adoption/Revision Date: March 20, 2018
Custodian: Information Technology Services Director	Approving Body: Executive Committee

1. Authority

- a. Executive Committee

2. References

- a. Various IT Steering Committee minutes.

3. Purpose

To establish guidelines for Social Media use. Social media can be an invaluable public relations and marketing tool and serve as a way of communicating important messages and covering news. Social media provides the ability to quickly reach broad audiences, such as for educational and employment recruitment related purposes. Clark County encourages the use of social media outlets to further the goals of the County and the missions of its Departments, when appropriate. The purpose of this policy is to provide standards and guidance regarding the use of social media platforms to support the County's goals, objectives, and mission.

4. Scope

This policy and procedure applies to all departments, employees, volunteers and contractors that manage the County's social media sites of Clark County as it pertains to the use of social media:

- Both on and off the County's social media sites;
- Whether accessed on or off the County's premises; and
- Whether such use is for the County on County time, for personal use during non-work time, outside the workplace, or during working time while using County-owned equipment

5. Policy Overview

- a. This sets expectations and guidelines for all Clark County employees and agents who use and manage information technology resources and services including, but not limited to, computing, networking, communications and telecommunications systems, infrastructure, hardware, software, data, databases, personnel, procedures, physical facilities, social media and any related materials and services.

6. Policy Performance

- a. The quantifiable performance indicator for this policy is one-hundred percent (100%) compliance by Clark County personnel.

7. Clark County Mission Statement

The mission of Clark County and its employees is to provide cost effective services, with equal access to all citizens; to continue and enhance partnerships; to responsibly manage our resources and prepare for the future.

CLARK COUNTY
SOCIAL MEDIA POLICY AND PROCEDURE

POLICY

It is the policy of Clark County to identify appropriate and authorized use of social media.

RESPONSIBLE FOR IMPLEMENTATION

Department Heads are responsible for:

- Assisting in the development and approval of social media messages
- Collaborating with the Privacy Officer, Security Officer, Emergency Operating Center (for emergency situations).

The Privacy Officer and Security Officer are responsible for overseeing the privacy and security components of this policy.

DEFINITIONS

Social Media is defined as: computer-mediated tools that allow people and companies to create, share, or exchange information in virtual communities and networks. Social media includes, but is not limited to blogs, chat rooms, podcasts, photo sharing sites, other types of self-published online journals and collaborative Web-based discussion forums including, but not limited to, Facebook, Instagram, Flickr, LinkedIn, Myspace, Snapchat, Tumblr, Twitter, YouTube, etc.

Privacy Officer which is designated as Clark County Corporation Counsel and is defined as:

The **Privacy officer** oversees all ongoing activities related to the development, implementation, maintenance of, and adherence to the organization's policies and procedures covering the **privacy** of, and access to, patient health information in compliance with federal and state laws and the healthcare.

Security Officer which is designated as Clark County Information Technology Services Director and is defined as:

The **Security Officer** is responsible for the ongoing management of information **security** policies, procedures, and technical systems in order to maintain the confidentiality, integrity, and availability of all patient health information systems.

PROCEDURES

1. Confidential Information

- A. Confidential Information may not be discussed or posted on social media at any time without authorization from the Privacy Officer and after obtaining a signed authorization from the client (patient).
- B. Confidential Information includes, but is not limited to protected health information (PHI), electronic protected health information (ePHI), employee medical information, user names and passwords, information system configurations, and other nonpublic information.

C. Prohibited Postings:

- i. Information about a client may not be posted/communicated in even a general manner as it may lead to a breach of confidentiality.
- ii. Do not post pictures, images, scans, etc.
- iii. Do not respond to someone else's communication/post about a client.
- iv. Do not attempt to contact clients through social media, personal accounts, or publically accessible Information Technology.
 - a. Do not extend or accept "friend" requests with clients.
 - b. Do not interact with current or past clients on personal social networking sites.
- v. Copyrighted information where written reprint permission is not obtained in advance may not be posted.
- vi. Anonymous postings are not allowed.

D. If PHI is seen on a social media site, public website, personal account, or unauthorized information system, immediately report it to the Privacy Officer, Security Officer, and Department Head. The Privacy Officer, Security Officer, and Department Head facilitate immediately removing the PHI from the websites/Information Technology or requesting it be removed after documenting facts about it.

2. County-Sponsored Social Media

A. County-sponsored social media may be used to:

- i. Convey information about County services;
- ii. Provide education;
- iii. Publish articles;
- iv. Facilitate discussions, obtain feedback, and exchange ideas or trade insights about industry trends;
- v. Advertise and sell County products or services;
- vi. Reach out to potential new markets;
- vii. Recruit employees, students, interns, etc.;
- viii. Issue or respond to breaking news or respond to negative publicity;
- ix. Brainstorm with employees and customers.
- x. Discuss department specific activities and events.

B. The County shall allow for all constructive viewpoints regarding issues/topics be expressed.

C. Social media accounts on any social media platforms on behalf of the County may not be created without prior written consent from a Department Head, Information Technology Services Department, Privacy Officer, and the department's standing committee.

- i. Submit a proposal to set up a County social media site to the department standing committee.
 - a. Include in the proposal
 - i. Name of the social media site
 - ii. A website link to the social media site
 - iii. Project description/goals and expected outcome
 - iv. How this project fits, benefits, or affects your departments strategic plan or County's mission statement.
 - b. The Department Head
 - i. Considers the proposal, and either:
 - A. Denies it; or

- B. If interested in the proposal, forwards it to the Information Technology Services Department and Security Officer
 - C. If approved by the Information Technology Services Department, forwards it to the standing committee for review and approval
 - ii. The Department Heads and Privacy Officer, or designee determines whether contracts are required to protect the social media site, content posted, etc.
 - iii. The Department Head facilitates an annual review of each social media site with the standing committee and the Information Technology department. The review process includes considering whether:
 - a. Goals are being met
 - b. There are any risks associated with continuing to use the site
 - c. The site should continue to be used
- D. Only employees designated and authorized by a County Department Head, and/or designee may, prepare content for or delete, edit or otherwise modify content on County-sponsored social media.
- i. Refer to the General Technology Policies and Procedures for requirements to:
 - a. Authorize/approve, change, and terminate access to the social media site (complete the Information Technology User Access Authorization form)
 - b. Set up role based access
 - i. The Information Technology Department sets up user access to Social Media sites.
 - ii. Work with the Information Technology Department and Security Officer when setting up social media sites to ensure appropriate technical and security controls are put in place.
 - iii. Authorized users of County-Sponsored social media must have:
 - a. A complete understanding of this policy and County publication standards; and
 - b. Appropriate content and technical experience.
- E. Social media postings managed by the County represent the perspective of the County and not the personal view point of individual employees.
- F. Employees, in their official capacity, who want to post comments in response to content must identify themselves as employees.
- G. Where possible and as applicable, include a County website link in social media postings.
- H. When including an external website link, include a disclaimer stating that Clark County does not guarantee the authenticity, accuracy, appropriateness, nor security of the link, web site or content linked thereto. This disclaimer may be included in an Information/About page or with the actual communication.
- I. Clearly indicate on County-sponsored social media sites:
 - i. It is maintained by the County;
 - ii. Author(s), if applicable; and
 - iii. Contact information.
- J. Social media sites that allow visitors to leave comments must include a disclaimer clearly stating that the County is not responsible for the content of visitor comments. This disclaimer may be included in an Information/About page or with the actual communication.
- K. When a social media site includes enrollment of public commentators, require they provide valid contact information, including a name, address, and email address.

- L. Employees designated by Department Heads are responsible for ensuring that the County-sponsored social media conform to all applicable County rules and guidelines. These employees:
 - i. Monitor content on a regular basis to ensure it is current, accurate, and in accordance with County policies.
 - ii. Are authorized to remove immediately and without advance warning any content, including offensive content such as pornography, obscenities, profanity and/or material that violates employer's anti-harassment policies.When there are questions as to whether other content should be removed from a social media site, discuss it with Corporation Counsel.

3. Use of Social Media

- A. Refer to and follow the General Technology Policy and Procedures, including but not limited to:
 - i. Unacceptable Use of Information Technology Resources
 - ii. No Expectation of Privacy
 - iii. Harassing or Discriminatory Behavior
 - iv. Reproduction and/or Dissemination of Materials
 - v. Federal, State, local laws and regulation.
- B. County Sponsored Social Media Sites as Public Record:
 - i. Accessing Social Media sites using the County's network may subject your personal site to public records.
 - ii. Individuals posting private or public content on social media sites using the County's network to access the site can then be considered for public records law purposes and may be subject to disclosure.
- C. This policy is not intended, nor shall it be applied, to restrict employees from discussing their wages, hours and working conditions with co-workers.
- D. Must Comply with the Clark County Retention Schedule.

4. Use of Social Media on Personal Time

- A. Employees who utilize social media and choose to identify themselves as employees of the County may not represent themselves as a spokesperson for the County.
- B. This section does not prohibit employees from including the County's name, address and/or other information on their social media profiles. However, employees must state explicitly, clearly and in a prominent place on the site that their views are their own and not those of the County or of any person or organization affiliated or doing business with the County, should they identify themselves as an employee of the County in a post.

5. Additional Monitoring of Social Media.

- A. The County reserves the right to monitor employees' and contractors' public use of social media including, but not limited to, statements/comments posted on the Internet, in blogs and other types of openly accessible forums, diaries and personal and business discussion forums.
- B. Employees' and contractors' should have no expectation of privacy while using County equipment and facilities for any purpose, including the use of social media. The County reserves the right to monitor, review and block content that violates the County's rules and guidelines.

Policy Attachments

Attachment A

Policy Review Form

Completed by Policy Custodian

Policy Title	IT Services Director
Overview of Adoption/Revision	03 08 2018
Policy Submitted By	Cindy Carrier
Policy Submitted To	IT Steering Committee and Executive Committee
Anticipated Date of Policy Final Approval	March 8, 2018

Completed by IT Steering Committee

Policy Received On	February 27, 2018
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Policy Forwarded to Corporation Counsel	03 07 2018

Completed by Corporation Counsel

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Policy Approved/Denied By	Jacob Brunette
Policy Forwarded to Executive Committee	03 08 2018

Completed by Executive Committee

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Policy Approved/Denied By	Executive Committee

Revision History

Adoption/Revision Date	Overview of Adoption/Revision	Adoption/Revision Reference
March 20, 2018	Original	Resolution 13-3-18