

Policy for Social Media Usage in Catawba County

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1. PURPOSE

The role of technology in the 21st century workplace is constantly expanding and now includes social media communication tools that facilitate interactive information sharing, interoperability, and collaboration. Commonly used social media Web sites, such as Facebook®, Twitter®, MySpace™, YouTube®, Flickr®, and LinkedIn®, have large, loyal user bases and are, thus, increasingly important outreach and communication tools for government entities from the federal to the local level.

Moreover, a social networking presence has become a hallmark of a vibrant and transparent communications strategy. Social networking improves interactivity between Catawba County and the public, and it reaches populations that do not consume traditional media as frequently as others do. Therefore, county agencies and departments of all types are encouraged to enhance their communications strategies by using social networking Web sites. In doing so, however, county agencies should take care to choose the types of social networks that make the most sense for their type of information and that give emphasis to tools that provide more information across multiple outlets to the broadest audience.

All communication tools should be used in ways that maximize transparency, maintain the security of the network, and are appropriately professional. Social media is no exception. Therefore, the application of social media within county agencies must be done thoughtfully and in a manner that will minimize risk. In addition, social media users should be aware that these types of communications are considered public records and, consequently, must be kept for a certain period of time in compliance with the public records law. These guidelines are intended to ensure that county agencies' social networking sites¹ are secure and appropriately used and managed by outlining "best practices" for the use of social media in Catawba County government. Thus, the guidelines are designed to protect county employees and ensure consistency across agencies when incorporating social media into their mission.

2. GUIDELINES

2.1 IMPLEMENTATION

Every department should have a clear communications strategy and should take the time to determine if and how social media fits into this strategy. Department Public Information Officers (PIOs) or a person designated by the department head should

¹ This document is not meant to address one particular form of social media, rather social media in general, as technology will inevitably change and new tools will emerge.

spearhead this activity and, in doing so, should consider the following questions when determining whether use of social media is appropriate:

- Who is the media meant to reach? Is this my target audience?
- What is the department attempting to communicate? Can it be effectively communicated using this media?
- Does the department want to elicit feedback from citizens? What media is best suited to allow for the type of interaction desired?
- Who is responsible for managing the department's account? Will this person represent the department appropriately? Have they been properly trained in the use of social media?
- What are the department's responsibilities regarding collection and records retention including preservation of social media content? What does the records retention schedule require for these records? How will we collect and store the media content?

When a department decides to use a form of social media that is deemed beneficial to its mission it should first establish employee boundaries for using the service. It is important for department supervisors to communicate expectations of appropriate usage for the media within the workplace.

There should be an authorization process for employees wishing to create an account for the benefit of the department, with the department PIO or a person designated by the department head as the authority to oversee and confirm decisions. In this role, the PIO must evaluate all requests for usage, verify staff being authorized to use social media tools, and confirm completion of online training for social media. PIOs should also be responsible for maintaining a list of all social networking application domain names in use, the names of all employee administrators of these accounts, as well as the associated user identifications and passwords currently active within their respective agencies. Should the employee who administers the account be removed as administrator, or no longer be employed by the department, the PIO should immediately change all passwords and account information to maintain department control. Departments must send the name of the person designated to oversee department sites along with site name and type to the county PIO who is responsible for maintaining a master list.

The Technology Department can help determine the best method to archive the content. Any department-related social networking usage implemented prior to the release of this document should be reviewed by the department PIO to make sure it is brought into compliance with these guidelines.

In summary, PIOs will:

- Oversee and confirm decisions regarding social media sites including authorization of sites
- Evaluate requests for usage

- Verify staff being authorized to use social media tools
- Maintain a list of social media domains, active account logins and passwords
- Change passwords if employee is removed as administrator in order to maintain department control
- Ensure social media material is archived including providing a list of all social media URLs and contact information

2.2 ACCEPTABLE USE

All use of social networking sites by county agencies must be consistent with applicable state, federal, and local laws, regulations, and policies including the Electronic Communications Policy (February 2010) and all information technology security policies. This includes the department and countywide acceptable use policies and any applicable Records Retention and Disposition Schedules or policies, procedures, standards, or guidelines promulgated by the North Carolina Department of Cultural Resources. All usage should be governed by these policies as well as the guidelines in this document.

Separate Personal and Professional Accounts:

Employees should be mindful of blurring their personal and professional lives when administering social media sites.

Personal Use:

Employees are allowed to have personal social networking sites. These sites must remain personal in nature and be used to share personal opinions or non-work related information. This helps ensure a distinction between sharing personal and county views. In addition, **employees should never use their county e-mail account or password in conjunction with a personal social networking site** and employees should never refer or link back to their own personal site from the professional site. Personnel should also remember the county ethics policy when posting on the Internet.

Professional Use:

All department-related communication through social media outlets should remain professional in nature and should always be conducted in accordance with the department's communications policy. Employees must not use social networking sites for political purposes, to conduct private commercial transactions, or to engage in private business activities. Sites containing anything racially or sexually discriminating or of a political or religious nature are prohibited. Employees should be mindful that inappropriate usage of social media can be grounds for disciplinary action. Thus, if an account is used for business, the entire account, regardless of any personal views, is subject to these best practices guidelines, including the collection and preservation provisions.

Be Clear As To Identity:

When creating social media accounts that require individual identification, county employees should use their actual name, not pseudonyms. However, using actual names can come with some risks. Any employee using his or her name as part of a county department's application of social media should be mindful of the following:

- Do not assume privacy. Only post information that you are comfortable disclosing.
- Use different passwords for different accounts (both social media and existing work accounts). Using the password for all accounts increases the vulnerability of the accounts being compromised.

Terms of Service:

Employees should be aware of the Terms of Service (TOS) of the particular form of media. Each form of social media has its own unique TOS that regulate how users interact using that particular form of media. Any employee using a form of social media on behalf of a county department should consult the most current TOS in order to avoid violations. If the TOS contradict department policy then the PIO should be made aware and a decision should be made about whether use of such media is appropriate.

Content of Posts and Comments:

Employees using social media to communicate on behalf of a county department should be mindful that any statements made are on behalf of county government; therefore, employees should use discretion before posting or commenting. Once these comments or posts are made they can be seen by anyone and may not be able to be "taken back." Consequently, communication should include no form of profanity, obscenity, or copyright violations. Likewise, confidential or non-public information should not be shared.

Employees should always consider whether it is appropriate to post an opinion, commit oneself or one's department to a course of action, or discuss areas outside of one's expertise. If there is any question or hesitation regarding the content of a potential comment or post, it is better not to post. There should be great care given to screening any communication made on behalf of the department using this social media as improper posting and use of social media tools can result in disciplinary action.

Posts and Comments Are Public Records:

Like e-mail, communication via department-related social networking Web sites is a public record. This means that both the posts of the employee administrator and any feedback by other employees or non-employees, including citizens, can become part of the public record. Information on social media sites has little or no historical value; therefore, content will not be retained in most cases. Because others might not be aware of the public records law, agencies should include the following statement (or some version of it) somewhere on the social networking Web site:

Representatives of Catawba County government communicate via this Web site. Consequently any communication via this site (whether by a county employee or the general public) may be subject to monitoring and disclosure to third parties and is considered public.

2.3 SECURITY

From a security standpoint, agencies should be mindful of how to best prevent fraud or unauthorized access to either the social media site or the county network. In almost every case where an attacker accesses a system without authorization, they do so with the intent to cause harm. The harm intended may be mild, such as:

- making unofficial posts, tweets or messages—possibly of an embarrassing nature—that will be seen by the public as official messages,
- using the compromised site to spread malware, or
- encouraging users to either click links or download unwanted applications that the attacker has added to the site.

In some cases, the intended harm may be more serious. For instance, attackers could access the network and obtain information that could be used to compromise or disable the county system, county employees, or citizens. In this scenario, attackers could acquire information such as:

- confidential information about County employees or citizens,
- sensitive security information,
- data about public safety plans, or
- defenses currently in place against attacks on public facilities.

Thus, security is an ever-present concern that must be addressed.

Methods Used to Breach IT Security

It is important to note that security related to social media is fundamentally a behavioral issue, not a technology issue. In general, employees unwittingly providing information to third parties pose a risk to the core county network. Consequently, employees should know the major threats they may face and how to avoid falling prey. Prevalent social media security risks include third-party spear phishing, social engineering, spoofing, and web applet attacks. See Appendix, page 8, for definitions of these terms.

Consequently, due to the relative vulnerability of social media sites to these security exploits, it is important to be cautious when using such sites. In order to prevent potential harm, users of social networking sites should minimize the amount of information an attacker is likely to gain from a successful attack. For example, individual user IDs and passwords should not be duplicated across multiple sites. In this way, if one site is compromised, the attacker cannot also gain access to other sites for which the users is authorized.

In particular, because of the importance of proper operation of the County network and the sensitivity of information stored on County systems within the network, a County employee must never use a current county password as a password on any other site.

If agencies participate in social networking, agencies should:

- ensure that employees are made aware of which information to share, with whom they can share it, and what not to share,
- provide security awareness and training to educate users about the risks of information disclosure when using social media, and make them aware of various attack mechanisms as described in this document,
- ensure employees are aware of Privacy Act requirements and restrictions. Educate users about social networking usage policies and privacy controls to help them better control their own privacy in any profile they use for work-related activities and more effectively protect against inadvertent disclosure of sensitive department information, and
- educate users about specific social media threats before they are granted access to social media websites.

2.4 RECORDS MANAGEMENT AND PRESERVATION

Communication through department-related social media is considered a public record under NCGS, Chapter 132 and will be managed as such.

- All comments or posts made to county department account walls or pages are public, not private.
- In the spirit of transparency in county government, account administrators who receive messages through the private message service offered by the social media site should direct the user to contact them at a public e-mail address maintained by their department. Alternatively, account administrators could reply to the inquiry using their county e-mail account. Agencies should set all privacy settings to moderated. Comments expressing an opposing view point must be allowed. Departments should only remove comments that are spam or comments that would not be acceptable in a public forum such as a commissioner's public hearing.

Agencies must assume responsibility for public records and adhere to the schedule of collection for social networking Web sites set by the North Carolina State Archives.

3. CONCLUSION

Social media is an effective and efficient way for agencies to communicate with and participate in the larger community. It will continue to shape and support the way agencies communicate and collaborate with constituents as they strive to provide an accountable and transparent government. As agencies use social media they need to strike a balance between providing access to information and securing the county's core network. To find that balance, each department needs to assess its risk. This document is meant to help agencies and their users understand these risks and outline some best practices for social media usage. Every department should adopt these tools and provide their employees support and guidance to use them productively and intelligently.

Appendix – Definitions

Copyrighted material – includes materials that may be protected by Copyright Law (for example, a cartoon, article, or excerpt from a book). In other words, if the information or material is copyrighted, it may not be publicly circulated without prior authorization from the copyright holder.

Cross-Site Scripting (XSS) - a security vulnerability which allows attackers to insert code into a target user's web page.

E-mail message – a single electronic mail message sent directly to another user.

Identity Spoofing - involves one person, system, or website successfully masquerading as another by falsifying identity-related information and thereby being treated as a trusted user or system by another user or program.

Post – comment made to a user's social networking page or site. For example, Facebook users can post to another user's "wall."

Record – data or information in a fixed form that is created or received in the course of individual or institutional activity and set aside (preserved) as evidence of that activity for future reference. A record has fixed content, structure, and context. (SAA Glossary)

Retention and disposition schedule – a document that identifies and describes an organization's records, usually at the series level, provides instructions for the disposition of records throughout their life cycle. (SAA Glossary)

Social engineering – an attack that involves gathering and using personal information about a target in a deceitful manner in order to convince the target to provide the attacker permission to obtain or access restricted information.

Social networking – the use of a variety of Web sites that allow users to share content, interact, and develop communities around similar interests.

Spear phishing – an attack targeting a specific user or group of users, attempting to deceive the user(s) into performing a routine action, such as opening a document or clicking a link, which the phisher has booby-trapped to launch an attack.

Terms of Service (TOS) – rules by which one must agree to abide in order to use a service. It is generally assumed such terms are legally binding.

URL Spoofing - an attack in which a legitimate web page is reproduced on a server under the control of the attacker and then a target is directed to this site, thinking that they are on the legitimate site.

Web Applets - code routines, scripts or utilities that interact dynamically with web pages to provide additional functionality to the user.