

Kenosha County Social Media Use Policy

This policy outlines appropriate use of social media as it relates to Kenosha County, by employees and department for official and personal use. This policy is to be used in conjunction with other Kenosha County policies.

I. Purpose

Kenosha County recognizes that online communication is fundamentally changing the way citizens, government entities and businesses interact with each other. The County has determined that online discussion through social computing may facilitate the efficient delivery of County services and information and foster a positive public perception and sense of community.

This policy is intended to provide a framework for use of social media when authorized by the County as part of an employee's job duties. This policy also provides general guidelines for the personal use of social media for all employees.

The forms of social media or technology referred to in this policy include, but are not limited to Facebook, LinkedIn, MySpace, Twitter, Yammer, YouTube, video or wiki postings, chat rooms, personal blogs or other similar forms of online journals, diaries or personal newsletters not affiliated with the County.

County-owned technology resources are the property of the County, as is all data created, entered, received, stored, or transmitted via County-owned equipment. All use of social media or similar technology is subject to all County policies, including but not limited to the Ethics Policy, the Electronics Communication Policy & the Harassment Prevention Policy and the Kenosha County Policies and Procedures Manual. Kenosha County employees are instructed to carefully read these policies and ensure all postings are consistent with these policies. Employees may be subject to discipline up to and including discharge for conduct that violates County policies or rules and regulations, whether such conduct occurs on duty or off-duty.

II. Definitions

The following definitions related to terms as used within the context of this policy:

Social Media - a means of interactions among people in which they may create, share, and exchange information and ideas in virtual communities and networks. Social media includes all communicating or posting information or content of any sort on the Internet, including your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Kenosha County, as well as any other form of electronic communication.

Blog - discussion or informational forum published on the Internet and consisting of discrete entries ("posts") typically displayed in reverse chronological order.

Facebook – social media network found at Facebook.com

Twitter – social media network found at Twitter.com

Spam - unsolicited bulk messages, especially advertising, indiscriminately sent to any number of recipients

Social Media Site – Any platform on which to build social networks or social relations for the sharing of information of common interest

Wiki – collaborative web site comprising the perpetual collective work of many authors.

III. Work Related Social Media Guidelines

The work related use of social media can range from passive review of social media profiles, for informational or investigative purposes, to the authoring of content through a department sponsored social media account. Any such work related use must be approved by an employee's supervisor. The following conditions also apply to such use:

1. Kenosha County employees are responsible for appropriate use of social media in accordance with this policy. Employees using social media platforms are expected to thoroughly review and abide by the Social Media policy in addition to signing the Social Media Acknowledgement Form.
2. Employees shall refer to the guidelines set forth in the Electronic Communications Policy¹ when utilizing County computers or other County supplied devices. Social media sites are to be used to further the goals of Kenosha County's department and provide a service to citizens. Appropriate time spent on updating social media sites should be discussed between the employee and the supervisor, and should not interfere with completion of other job duties.
3. Employees authorized to publish content to a department sponsored social media site shall be designated as social media representatives and such designation shall be made by the employee's Department director with notice to the Social Media Steering Committee.
4. Employees may only establish official sites, blogs, pages, or accounts in their official capacity as County staff on a social media site with the authorization of their Department director and the Social Media Steering Committee. Notification of all new official Social Media sites must be provided to the Social Media Steering Committee. All County authorized social media sites are to be sponsored by a County agency or department and the content of such site will become the responsibility of the department and its management.

¹ "Electronic Communications Policy" <http://www.kenoshacounty.org/DocumentCenter/Home/View/374>

5. Permission to author content on County authorized social media sites will only be granted to those employees who are authorized to speak on behalf of the County via these electronic communications media.
6. Social media posts should be an extension of Kenosha County's official website. Whenever possible, links to more information should direct viewers back to Kenosha County's official website for more information, forms, documents or online services.
7. Employees are expected to recognize the confidentiality of certain County information, and the privacy rights of employees and residents, and are prohibited from disclosing confidential, personal employee and non-employee information and any other proprietary and/or nonpublic information to which employees have access. This includes, but is not limited to disclosing personally identifiable information such as social security numbers, phone numbers, addresses, email addresses, or other information protected under the Health Insurance Portability and Accountability Act ("HIPAA"). Questions regarding whether information has been released publicly or doubts regarding the propriety of any release, shall be directed to the employee's supervisor before releasing the information and/or the Division of Human Resources.
8. If posting a picture or video of an adult, the individual must consent to the use of their image on the social media site, by signing Exhibit B, a Social Media Permission Form/Waiver, unless the picture or video was taken at a public event.
9. Pictures or videos of minors will not be posted unless the minor is unidentifiable, or a parent or legal guardian has signed a Social Media Permission Form/Waiver, Exhibit B, granting permission to photograph, audiotape, videotape, publish and copyright images of their minor child.
10. Kenosha County employees are expected to adhere to the highest ethical standards when conducting County business. When communicating electronically, employees are expected to speak respectfully about the County and County-related matters, and limited to items in which the employee is authorized to speak and to identify themselves and their role with the County.
11. Employees are expected to follow copyright, fair use and financial disclosure laws when using on-line communications. Note that the use of copyrighted materials, unfounded or derogatory statements, or misrepresentation can result in disciplinary action up to and including termination.
12. Employees are encouraged to publish content that is related to the subjects associated with their position with the County. When writing about County matters employees should try to add value and provide worthwhile information and perspective.
13. All official Kenosha County social media sites and blog posts made or cases where an employee is speaking as a representative of the County will include the following disclaimer: "The information on this site is provided as a courtesy for informational purposes only. Please contact the listed media contact for this (site, page, etc.) to confirm the accuracy of the information on this site. Content on this site is not to be construed as a legal notice."

14. Honor the privacy rights of our current employees by seeking their permission and the permission of their Department director before writing about or displaying internal happenings that involve the employee.
15. Employees should not cite or reference County contractors or suppliers without their approval. Care should be taken to not promote one contractor over another or provide preferential treatment of any kind.
16. Employees may not post employment recommendations or references for current or former employees of Kenosha County on any social media site. All requests for recommendations or references shall be directed to the Division of Human Resources.
17. Authorized social media sites are not be used to express a political view point or endorse a political candidate.
18. Employees should be aware of their association with the County. Employees serve as an ambassador of the County. Employees should not post any comments or postings that violate section IV (8) below regarding inappropriate comments.
19. Employees should be fair and courteous to fellow employees, customers, members, suppliers or people who work on behalf of Kenosha County. Employees should keep in mind that they are more likely to resolve work-related complaints by speaking directly with co-workers or by using the County Conflict Resolution Policy than by posting complaints to a social media outlet. If employees decide to post complaints or criticisms, they should avoid using statements, photographs, video or audio that could be reasonably viewed as malicious, obscene, threatening or intimidating, or that disparages customers, members of the public, other employees or suppliers or that may constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or County policy.
20. Employees shall strive to post honest and accurate information when posting information or news. If a mistake is made, the employee should correct it quickly but be open about previous posts that have been altered. The Internet archives items, therefore even deleted postings can be searched. Employees must never post any information or rumors known to be false about the County, fellow employees, suppliers or people working on behalf of the County.
21. Login information, including User ID's and passwords for information contained on the County's social media sites, must be provided to an employee's supervisor or a member of the Social Media Steering Committee upon request. Upon change of job responsibilities or separation of employment, employees must surrender all login information and passwords.

IV. General Social Media Site Guidelines for Authorized Sites

1. All County social media sites must be sponsored by a Kenosha County department. The department must include a link to this site from their departmental home page and the County's official social media directory, on the County's official website.

2. All social media platforms will clearly indicate they are owned and maintained by Kenosha County and will have Kenosha County contact information prominently displayed.

3. Kenosha County logos, marks and insignia may be used on County social media platforms owned and maintained exclusively for County business and County purposes.

4. It is the responsibility of the department to establish, publish and regularly update its pages on social media websites. It is the responsibility of the department to ensure that information is accurate and up to date.

5. Departments using social media sites must adhere to all applicable Federal, State and County laws, regulations and policies. This includes all copyright laws, public records laws, retention laws, fair use and financial disclosure laws and all other laws that might apply to the County.

6. The sponsoring department will be responsible for all management of an authorized social media site and it is the Department director's responsibility to maintain compliance with this policy and all other applicable policies or laws in the management of their social media site(s).

The accuracy, quality and timeliness of all content on an authorized social media site is the responsibility of the sponsoring department. Likewise, the authorization of the appropriate staff to maintain such a site is also the responsibility of the sponsoring department.

7. When creating a County social media site, page, etc, all departments and employees should adhere to the following guidelines:

- a. Appropriate use: All communications carried out on County equipment or County sponsored electronic media must adhere to the appropriate use guidelines set forth in the technology use policy.
- b. Encourage one-way communication when possible. Use of two-way communication is permitted in cases where limiting the application to one way communication would reduce or negate the value of the social media application.
- c. Comment Policy: Any County authorized social media site which allows comments to be posted must display the following comment policy:

The purpose of this site is to present matters of public interest in Kenosha County, including information regarding its many residents, businesses and visitors. We encourage you to submit comments, but be advised this is not an open public forum. Once posted, the County reserves the

right, but assumes no obligation to delete submissions that are illegal, obscene, defamatory, threatening, invade privacy, or which are considered to be offensive to anyone or may infringe upon the intellectual property or copy rights of others. The County does not necessarily review all posted comment on a regular basis. Furthermore, the County reserves the right to delete any comment for any reason and will immediately delete any comments that include: spam or links to other sites; are clearly off topic; advocate illegal or illicit activity; promote particular products, services or vendors; infringe on copyrights or trademarks; or advocate for a particular political organization, party, candidate or point of view; or contain threats, profane or discriminatory language or other confidential, obscene or repetitive information. Comments expressed on this site do not necessarily reflect the opinions of Kenosha County or its employees. The County takes no responsibility nor assumes any liability for any content posted on this site. Please contact the site administrator for assistance with a comment you believe violates the above policy.

8. Those in charge of publishing and updating within each department must monitor any comments made by the public and employees. Comments containing any of the following should be archived and removed immediately:

- a. Spam;
- b. Off topic posts or comments outside the forum established to discuss Kenosha County issues, operations and services;
- c. Promotion of illegal activity;
- d. Unauthorized use of copyrighted or licensed material;
- e. Promotion or derogatory remarks relating to a political organization, a political candidate or party;
- f. Solicitations of commerce or endorsements of products and/or services;
- g. Personal attacks or threats to an individual's safety or other comments that compromise the safety and security of the public;
- h. Profane language or content;
- i. Comments containing personally identifiable medical or health information;
- j. Content that is discriminatory, offensive, or provokes discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regards to public assistance, national origin, physical or mental disability or sexual orientation;
- k. Sexual content or links to sexual content; and

1. Repetitive posts.

9. Kenosha County reserves the right to restrict or remove any content that is deemed in violation of this policy or any applicable law.

10. If the particular social media technology does not provide space for the above, a link from the social media application or user profile to the Social Media Policy page on the County website is to be provided.

V. Administrative Structure/Required Elements: Any County authorized social media site will require the following:

1. Assigned administrator: This person will be responsible to see that the use of the social media site adheres to this policy and all related County policies. The name of the site administrator must be filed with a request for an authorized social media site. A back-up administrator shall also be designated to prevent issues related to site administration during the absence of the assigned administrator. The site administrator and backup administrator must be a non-represented employee.

2. Approved content authors: Sponsoring departments must authorize all employee content authors for their departmental social media site.

3. Notification to Administration: The Social Media Steering Committee is to be made aware of any and all department sponsored social media sites, and the Committee must be given the following information:

a. Site Address

b. Purpose of site

c. Administrator of site and

d. Type of communication, one-way, two-way moderated, open two-way

4. Required elements of a County authorized social media page: Technology permitting, all County sanctioned social media sites should contain the following information in a prominent place on the site:

a. County department clearly identified

b. Comment policy

c. Stated purpose of page

- d. Notification that violations of comment policy will result in blocking use
- e. Disclaimer similar to the following “The information provided herein is provided as a courtesy and for information purposes only. Please contact the listed media contact for this (site, page, etc.) to confirm the accuracy of this information found herein. Content on this site is not to be construed as legal notice.
- f. Official contact for page

VI. Public Records/Open Meetings and Retention

Wisconsin’s Public Records and Open Meeting Law requirements are mandated by the State of Wisconsin. 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. Each department utilizing a social media presence is responsible to ensure compliance with all applicable public records laws. The following guidelines are intended to assist departments in maintaining such compliance:

1. It is recommended that County social media authors use only existing material from existing County web pages or previously published documents.
2. Content exclusive to a department’s social media site should be captured and saved in an archival copy.
3. Copies of all content removed from the site are to be retained in archival copy.
4. Social media is not to be used as a medium for conducting government business.
5. Technology permitting, it is recommended that a backup of the entire site be captured and retained on a regular basis.
6. Questions regarding the applicability of the Public Records and Open Meetings Law to specific content, or a particular use case, should be referred to the department head and/or the Corporation Counsel before posting the information or using the social media.
7. Wisconsin State law and relevant Kenosha County records retention schedules apply to social media formats and their content.

VII. Personal Use of Social Media

Kenosha County respects the right of employees to use social media and does not discourage employees from self-publishing, self-expression and public conversation and does not discriminate against employees who use these mediums for personal interests and affiliations or other lawful purposes. Employees are expected to follow the guidelines and policies set forth to provide a clear line between you as the individual and you as the employee of Kenosha County.

1. If one should identify themselves as a County employee during their use of social media on a personal level, the profile and any related content should be consistent with how you wish to present yourself to your colleagues, supervisors and the public.
2. Employees should make it clear that he or she is speaking for themselves and not on behalf of Kenosha County. If any information posted is related in any way to the work an employee performs or any topics related to the County, a disclaimer must be used such as, “[t]he opinions expressed on this site are my own and do not reflect the opinions of Kenosha County.”
3. Employees shall refer to the guidelines set forth in the Electronic Communications Policy when utilizing County computers or other County supplied devices. Do not use Kenosha County email addresses to register on social networks, profiles, blogs or other online tools utilized for personal use.
4. Employees shall refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your supervisor or manager and consistent with County policy.
5. Employees are personally responsible for their commentary on all social media sites and can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libelous by any party.
6. Employees can be disciplined for using social media in a manner that violates County policies. Information posted on social media sites can be used by the County as evidence in disciplinary actions.
7. When using social media, employees are encouraged to be fair and respectful to fellow employees, supervisors, customers, members, suppliers or people who work on behalf of Kenosha County. If employees decide to post complaints or criticisms, they should avoid using statements, photographs, video or audio that could be reasonably viewed as malicious, obscene, threatening or intimidating, or that disparages customers, members of the public, other employees or suppliers or that may constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or County policy.
8. Employees are encouraged to be careful in their use of social media to avoid the appearance of using that media in an official capacity.
9. Employees cannot post the name, trademark or logo of the County, company-privileged information, including copyrighted information or company-issued documents, or photographs of other employees, residents, vendors or suppliers taken in their capacity as County employees.

10. Employees should not link from a County internal or external web site to a personal social media site without the permission of their Department director and the assigned administrator.
11. Employees are advised that social media platforms may be subject to legal discovery including subpoenas in legal proceedings.
12. Employees shall recognize and maintain the confidentiality of certain County information and privacy rights of employees and Kenosha County residents and therefore shall not release information on personal social media sites.

VIII. Employer Monitoring

Employees have no expectation of privacy while using the County's technology resources for any purpose, including authorized social media. The County monitors all such use and may withdraw content deemed to be inappropriate, outside the scope of an employee's authority, or in violation of County policy as determined by the Department director or the Division Director of Human Resources.

IX. Reporting Violations

The County requests and strongly urges employees to report any violations of possible or perceived violations of this policy to supervisors or the Division of Human Resources. Kenosha County prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee will be subject to disciplinary action, up to and including termination.

X. Discipline for Violations

The County will investigate and respond to all reports of violations of this policy. Violations may result in disciplinary action up to and including termination.

XI. Changes to this Policy

Kenosha County may from time to time, modify this Social Media Policy to reflect legal, technological and other developments. A current copy of this document can be found at <http://www.kenoshacounty.org/DocumentCenter/View/4413>.

XII. Accessibility

Kenosha County and/or the applicable departments shall provide an alternate source for any information posted online for individuals who do not have access to a computer or other electronic devices. Similarly, to comply with Section 508 of the Rehabilitation Act, whenever possible and not prohibited by other rules and regulations, when posting photographs, Kenosha County employees shall add text to explain what is in the picture. For video postings, text

should be added explaining what the video is about. For a PDF posted to the County website and linked to a social media site, employees should clearly identify what is in the PDF and an alternative way to obtain the PDF (such as a telephone number).

XIII. Acknowledgement

All Kenosha County employees using social media platforms are expected to thoroughly review and abide by the Social Media Policy in addition to signing a Social Media Acknowledgement Form.

XIV. Specific Social Media Guidelines by Medium for Authorized Sites

Twitter

Twitter is an online social networking site where members can post short updates and keep up with other members through online profiles or cell phone text messages. Effective and approved applications for County use of Twitter would be to re-broadcast the County's blog headlines, news releases, testimonies, statements, public service announcements, accomplishments, job announcements, and to alert citizens of emergency broadcasts, epidemics, recalls, hazardous materials incidents, national incidents, terrorists' threats and natural disasters.

Legal implications of Twitter relate primarily to the privacy of members that follow County Twitter accounts and the appearance of commercial endorsement. County Twitter accounts should not be used to follow personal, commercial, or political Twitter accounts.

In order to comply with the requirements of this policy, a link from the Twitter profile to the disclaimer and comment policy on the County web page should be included.

Retweeting should be limited to information from appropriate, credible sources such as government agencies, authorities/boards, commissions, and industry leaders.

Facebook

Effective applications for County use of Facebook include public outreach programs that target segmented audiences, public service announcements, departmental contact information, emergency broadcasts and other public affairs activities.

Legal implications of County use of social media relate primarily to:

1. Copyrights of video footage and photos uploaded by County representatives. Risks can be mitigated by following these standard operating procedures:
 - a. County source materials. Use only photos and videos produced by the County or contractors working directly on behalf of the County

- b. Obtain written copyrights. If copyrighted materials are use, be sure to get and maintain physical records of copyright licenses and honor any branding or labeling requirements specified in the copyright license.
 2. Privacy rights of individuals who become friends, fans or followers of County sites. Social media users will follow these guidelines:
 - a. Account. County representatives who set up accounts should use a general office e-mail account, department name and general office phone number if possible.
 - b. Restrict to Find People and Follow People. County representatives should not follow private citizen or commercial profiles from within their County social networking profile. While the County cannot necessarily stop all people from being Friends, Fans or following us, employees should not click onto the profiles of our Friends, Fans and Followers.
 - c. Comments and Discussions. Representatives must refrain from participating in dialogue and online discussions with social profile visitors unless to clarify services provided. While it is encouraged for visitors to submit questions, comments, criticisms and concerns, the social profile is a moderated online discussion site and not a public forum.
3. Accessibility rights are governed by Section 508 compliance and web accessibility for people with visual and hearing disabilities. Social media users will follow these guidelines
 - a. Video captions and transcriptions. Embed captions within videos as part of the postproduction process. Provide transcripts of videos and attempt to include these transcripts on the social networking site. Maintain Section 508 compliant videos, captions and transcripts on the County's website and attempt to link back to the County website from the social networking site.
 - b. Photo - alternative descriptions. Name the photo after the description before uploading it to the social networking site. Write text captions and descriptions when social networking site makes these form fields available.
 - c. PDFs. Work to make document compliant in source format before converting to a PDF. Use formatting such as headers when applicable. Embed hyperlinks within the anchor text rather than supplying the physical URL to the right of anchor text.
4. Brand management of County logos and color or style guides. Social media users will follow these guidelines:
 - a. Profile Picture. County profiles should upload the County or departmental seal or logo as their picture. It is important to use the County/departmental seal or logo to demonstrate authenticity.

- b. Profile Design. County profiles should use colors consistent with the County's brand, and should not use extraneous or distracting design. All design should be in keeping with Section 508 compliance (web accessibility) needs and maintain professionalism and consistency with County branding.

5. Open Records requirements are mandated by the State of Wisconsin. County social media authors will use existing material from existing County web pages or previously published documents.

Blogs:

Blogs are forums which allow the posting of information and allow comments to such posts. Individuals who wish to use blogs to keep the public regularly informed of the activities of their departments are required to do so within the bounds of this policy. Kenosha County will allow the use of County related blogs under the following standards and conditions:

1. Whenever possible, blogs should be hosted on County servers or with County approved service provider, managed by the Division of Information Technology.
2. Employees are permitted to create, or use a blog only with the approval of their Department director.
3. Blogs must be reliable and dependable. Once a blog is started, it must be regularly updated and maintained.
4. Only County-related matters are to be addressed in blog entries.
5. All blogs, comments, and postings must be respectful to employees, divisions, departments, residents, and others.
6. Blogs and blog posts must be accurate, fair, unbiased, and reflect positively on Kenosha County.
7. Posts should not be edited after the fact. Those making changes to previous posts should indicate that they have done so.
8. All blog postings will be monitored. Employees have no expectation of privacy in their use of County technology resources. The County may remove any blog entry deemed to be inappropriate, outside the scope of their authority, or in violation of County policy as determined by the Department director and/or the Division Director of Human Resources.

Exhibit B – SOCIAL MEDIA PERMISSION FORM/WAIVER

I give Kenosha County permission to publish and copyright my image (including audio, video or photography) at the _____ event in any publication relating to Kenosha County including, but not limited to brochures and websites, including social media websites.

(Printed Name)

(Signature)

(Date)

I give Kenosha County permission to photograph, audiotape, and/or videotape my child(ren) during the _____ event.

(initial)

I give Kenosha County permission to publish and copyright those images (including audio, video, and/or photography) of my child(ren) in any publication relating to Kenosha County including, but not limited to, brochures and websites, including social media websites.

(Printed Name of Minor)

(Printed Name of Parent/Legal Guardian)

(Printed Name of Minor)

(Signature of Parent/Legal Guardian)

(Printed Name of Minor)

(Date)