



**Policy Type:** Administrative

**Category:** Information Technology

**Policy Name:** Social Media Application Policy

**Policy Owner:** County Executive

## **Policy Summary**

### **Social Media Application Policy**

This policy is intended to provide guidance to County of Santa Clara Department/Agency heads and Social Media Authorized Agents in their use of Social Media Applications on behalf of the County in order to balance the risk associated with using social media with the benefits of engaging the public. The purpose of this policy is to provide departments/agencies with best practices so that, if they choose to use social media, they have an understanding of the legal risks and can limit liability to their departments and the County.

#### **1. OVERVIEW**

The County of Santa Clara Social Media Application Policy includes four sections: 1) overview, 2) policies and responsibilities regarding the use of a County-sponsored Social Media Application (SMA), 3) policies and responsibilities regarding SMAs that are not County-sponsored, and 4) references to related County policies and guidelines. Additionally, this policy includes a summary of SMA best practices for Authorized Agents.



### *1.1 Background*

SMAs are online technologies, tools, and practices that people use to share opinions, insights, experiences, and perspectives. Instead of information being presented for passive viewing by website visitors, social media users are expected to actively participate in information exchange. In many cases, users may update or create content, as well as view it. Social media can take many forms, including text, images, audio, and video. These sites typically use technologies such as blogs, message boards, podcasts, and wikis to allow users to interact anonymously, confidentially, or publicly.

SMAs have potential benefits for enhancing County internal business processes, particularly those that require real-time collaboration among workgroup members. However, when a member of the public posts inappropriate material on a County-sponsored SMA, he or she can create potential legal, security, and privacy issues, and misrepresent the County organization.

Social Media Applications and capabilities change rapidly. This Social Media Application Policy shall apply to all similar technologies, even if a technology is not named explicitly in this policy.

### *1.2 Authority*

This policy has been approved by the County Executive.

### *1.3 Applicability*

This policy applies to all County departments/agencies and employees/affiliates participating in Social Media Application activities that meet any or all of the following criteria: 1) The SMA activities are conducted on behalf of the County or a department/agency; 2) The SMA uses County



resources, such as staff time or equipment; or 3) The SMA is used to conduct County business.

#### *1.4 Expectations and Conduct*

Department/agency heads and Authorized Agents who use SMAs to conduct County business are expected to comply with existing legislation, policies, and agreements, as well as with this SMA Policy.

##### *1.4.1 Roles of Authorized Agents in Using SMAs to Conduct County Business*

An Authorized Agent is any employee/affiliate granted express permission by a department/agency head to use SMAs for conducting County business. Authorized Agents must abide by the specific policies regarding SMAs, as well as existing legislation, policies, and agreements. The [Santa Clara County Information Technology User Responsibility Statement](#) specifies that when conducting County business, County employees/affiliates may use "data exchange services," which include Social Media Applications, with permission from their department/agency management. The department/agency head will also be considered an Authorized Agent if the department/agency head personally uses an SMA to conduct County business.

##### *1.4.2 Roles of County Employee/Affiliate While Using SMAs for Purposes Other Than Conducting County Business*

For all employees/affiliates, the existing [Santa Clara County Information Technology User Responsibility Statement](#) applies to any use related to SMAs. The User Responsibility Section 1.17 covers use of County-owned devices and data, and section 2 covers internet use, including social network sites. In general, Users must not use County systems or networks for personal activities. However, reasonable incidental (*de minimis*)



personal use of County resources, such as internet access and email, is allowed as long as such use does not violate the County's acceptable use policies, and does not interfere with the performance of work duties or the operation of the County's information systems. If a User is unclear as to what is considered appropriate incidental personal use, it is the responsibility of the User to ask for guidance from department/agency management.

## 1.5 Purpose

The purpose of this County policy is to ensure that:

- Participation in SMAs on behalf of the County is consistent with County policies and procedures, and complies with all applicable laws, including, but not limited to, laws related to privacy, confidentiality, discrimination, copyrights, trademarks, accessibility under the [Section 508 of the Federal Rehabilitation Act](#), Meyers-Milias-Brown Act, and employee/affiliate rights under applicable California and federal laws.
- Departments/agencies have a Social Media Application Business Plan approved by the CEO or designee before implementing a County-sponsored SMA or within four months of the implementation of this policy to ensure that the use of an SMA is appropriate for County business.
- Communications posted by an Authorized Agent on an SMA are timely, accurate, and legal, and are approved by an authorized spokesperson.



- Department/agency heads and Authorized Agents are on notice that personal SMAs are not to be used to conduct County business.
- Departments/agencies have the opportunity to develop additional Social Media policies that address specific departmental concerns or requirements, and do not conflict with this County SMA policy or with the [Santa Clara County Information Technology User Responsibility Statement](#).
- Department/agency heads and Authorized Agents comply with this policy and the [Santa Clara County Information Technology User Responsibility Statement](#).

### *1.6 Organizations Affected*

The authority of this policy extends to the use of County-sponsored SMAs by all County of Santa Clara departments/agencies and all Authorized Agents. This policy does not apply to SMAs solely used for personal activities, so long as no County resources, including staff time and equipment, are used.

### *1.7 Definitions*

Definitions of specialized terms used in the policy include:

#### *1.7.1 Authorized Agent*

Any County of Santa Clara employee, contractor, consultant, service provider or volunteer who has been authorized, in writing by a department/agency head, to 1) post, maintain, or manage content on a specified County-sponsored SMA, and/or 2) to post content to other SMAs



for County business. Authorized Agents may be required to participate in the County Social Media Monitoring Team (SMMT) to review comments or other postings from the public, and moderate postings in accordance with this policy. A department/agency head will also be considered an Authorized Agent if he or she personally uses a County-sponsored SMA.

*1.7.2 County Executive (CEO) or CEO's designee*

The chief executive of the County of Santa Clara. The CEO or the CEO's designee is responsible for approving Social Media Business Plans and responding to complaints about County-sponsored SMAs. The CEO or the CEO's designee shall have the right to direct departments/agencies to modify County-sponsored SMAs to conform to County policies and to mitigate security risks.

*1.7.3 Chief Information Officer (CIO) or CIO's designee*

The CIO of the County of Santa Clara. The CIO or the CIO's designee is responsible for maintaining a list of all County-sponsored SMAs and their corresponding user names and passwords.

*1.7.4 County-sponsored Social Media Application (SMA)*

A County-sponsored SMA used to conduct business for the County of Santa Clara or a County department/agency. An SMA is not County-sponsored until the County department/agency has submitted a Social Media Application Business Plan and the Plan has been reviewed and approved by the CEO or designee. Each SMA used by a department/agency must either be approved as a County-sponsored SMA or must not be used to conduct County business.

*1.7.5 County Social Media Monitoring Team (SMMT)*



The County Social Media Monitoring Team (SMMT) is composed of selected Authorized Agents and other County staff selected for their subject matter expertise. Team members also may be members of the Enterprise Content Management – Center of Excellence (ECM – CoE). SMMT members monitor postings on County-sponsored Social Media Applications, and may, on the advice of Counsel, grant permission to departments/agencies to remove or otherwise moderate those postings according to County policy and procedures.

### *1.7.6 Employee/Affiliate*

An employee/affiliate is any employee, volunteer, contractor, intern, or other individual performing work on behalf of a County department/agency, regardless of status, compensation, or job title.

### *1.7.7 Enterprise Content Management – Center of Excellence (ECM – CoE)*

The ECM – CoE is a sub-committee of the Business and Information Technology Steering (BITS) Committee. The ECM – CoE receives and reviews all Social Media Application Business Plans, as well as administers the SMMT.

### *1.7.8 "Moderate Postings"*

As used in this policy, "moderate postings," "moderate comments," or any other similar term, means removing, deleting, hiding, editing, censoring, or in any other way altering any posting, comment, text, image, or any other content posted to a County-sponsored SMA by any user other than an Authorized Agent acting in his or her official capacity. No one, including Authorized Agents, may moderate postings without the express permission



of the Social Media Monitoring Team (SMMT) or prior permission specially granted under section 2.4.7 of this policy.

### *1.7.9 Public Information Officer (PIO)*

The PIO is the Director of Public Affairs for the County of Santa Clara. In addition, some large departments or agencies have a departmental Public Information Officer.

### *1.7.10 SCC*

An abbreviation for the County of Santa Clara.

### *1.7.11 Social Media Application (SMA)*

An SMA is any online technology, tool, or practice that can be used to share opinions, insights, experiences, perspectives, or any other content. SMAs can take many forms, including text, images, audio, and video. These sites typically use technologies such as blogs, message boards, podcasts, and wikis to allow users to interact anonymously, confidentially, or publicly.

## *1.8 Legal Issues*

### *1.8.1 Protect Confidential Information*

Communications posted on an SMA should never contain material that directly or indirectly discloses information that is protected by law, such as health information (including patient identities), criminal history data, or information that could potentially be used for identity theft (such as Social Security Numbers, birthdates, driver's license numbers, or credit card numbers). Posted materials must comply with all applicable privacy policies and legislation. (*Refer to User Responsibility Statement 1.13, 1.18.*)





### *1.8.2 Keep Proprietary Information Secret*

SMAAs should not post proprietary or trade-secret information. (*Refer to User Responsibility Statement 1.13, 1.16.*)

### *1.8.3 Keep Interactions Professional and Polite*

When using an SMA to conduct County business, employees/affiliates must take care not to post any material that is or can be perceived as obscene, defamatory, profane, libelous, threatening, harassing, discriminatory, abusive, hateful or humiliating to another person or entity. In addition, according to County policy, employees/affiliates may be sued and held personally liable for any defamatory or proprietary commentary that they post to an SMA. (*Refer to User Responsibility Statement 1.17.*)

### *1.8.4 Be Aware of Copyrights and Personal Privacy*

Authorized Agents may post copyrighted materials -- including photos, videos, text, or sounds -- only if the Authorized Agent has obtained prior written permission from the copyright owner. Authorized Agents generally may link without permissions to copyrighted work posted by someone else, such as news articles posted on a news site or a YouTube video posted by another user. To respect people's privacy, Authorized Agents must also obtain permission through a model release for individuals prominently and identifiably featured in a photo or video. Examples of when a model release is necessary include individuals interviewed or otherwise engaged by County staff for a YouTube video or a photo, individuals in staged photos or videos intended for promotional materials, and celebrities or other high-profile individuals. Model releases generally will not be needed for incidental or non-identifiable images or video of individuals, such as a photo of a large crowd at a ribbon-cutting ceremony, a video clip of a



crowd at a fair, or pictures of individuals whose faces and other identifying characteristics are not portrayed (such as a photo taken from far away).

*(Refer to User Responsibility Statement 1.16, 1.17.)*

#### *1.8.5 Protect the Privacy of Minors*

Notwithstanding section 1.8.4 of this policy, Authorized Agents must obtain written permission from a parent or guardian of any individual under the age of 18 who is identified in any SMA post. Identifying information includes any portrayal of the minor's likeness, the minor's name, and any other information or combination of information that could allow a reader to identify the minor, such as the minor's first name along with the minor's school or age. All parents or guardians giving written permission must be informed that the image, video, and text used becomes property of the County of Santa Clara.

#### *1.8.6 Observe Free Speech Rights*

The County will not deny the right to free speech when moderating comments or postings on a County-sponsored SMA. To minimize the possibility of denying free speech, only members of the Social Media Monitoring Team (SMMT) will have the authority to grant permission to moderate or delete postings on County-sponsored SMA. Neither Authorized Agents nor department/agency heads may moderate postings without the express permission of the SMMT or prior permission specially granted under section 2.4.7 of this policy. All departments/agencies must comply with the SMMT's decision regarding whether to keep or moderate postings.



### *1.8.7 Respect Employees'/Affiliates' Legal Rights*

This SMA Policy does not restrict County employees' or affiliates' legal rights under California laws or federal laws to hold discussions or participate in activities relating to their terms or conditions of employment, including wages, hours and working conditions.

### *1.8.8 Follow Accessibility Guidelines Under Section 508*

Ensure that a County-sponsored SMA provides accessible content. The County-sponsored SMA must comply with [Section 508 of the Federal Rehabilitation Act](#) to ensure that people with visual and hearing disabilities can use the site effectively.

### *1.8.9 Follow Records Retention Schedule and Management Policies*

Departments/agencies shall comply with all applicable County records retention and records management policies, as well as with the [County Information Technology Security Policies](#), Section 18.0 Electronic Records Retention. Section 18.0 specifies that department/agency management is responsible for developing a records retention schedule, as well as establishing guidelines for retaining and deleting Business Electronic Records, and ensuring that users are aware of these guidelines.

View the County's Record Retention and Destruction Policy – Board Policy 3.57 at <https://saecommon.sccgov.org/countypolicy/Board-Policy-3.57-Record-Retention-and-Destruction.pdf>.

### *1.8.10 Comply with the Children's Online Privacy Protection Act (COPPA)*

When a County-sponsored SMA collects personal information from children under 13 years of age, the SMA must comply with the Children's Online



Privacy Protection Act (COPPA).

### *1.8.11 Limitations*

Although this policy deals specifically with SMA technologies, it does not supersede or replace other relevant County policies that do not specifically mention SMAs. Departments/agencies may develop social media policies to address specific departmental concerns or requirements that do not conflict with this County SMA Policy or the [Santa Clara County Information Technology User Responsibility Statement](#).

### *1.9 Security*

County security requirements are applicable and remain in force for SMAs; they are contained in two County documents: [County Information Technology Security Policies](#), and the [County Information Technology User Responsibility Statement](#).

### *1.10 Consequences of Non-Compliance*

An Authorized Agent may be subject to discipline if he/she violates Federal, State, or County laws, departmental policies, Merit System Rules, or privacy laws, including but not limited to laws regarding disclosure of confidential information, harassment, retaliation, defamation, etc. Failure to comply with laws and policies may result in withdrawal, without notice, of access to information and IT resources. By signing this Social Media Application Policy, the Social Media Application Business Plan, or any other attachments, Authorized Agents acknowledge that they have read and understand the contents and that violation of any of the provisions may result in disciplinary action, up to and including termination of employment and/or criminal prosecution.



## **2. County-Sponsored Social Media Applications**

A County-sponsored SMA is used to conduct County business for the County of Santa Clara or a County department/agency. An SMA is not County-sponsored until the County department/agency has submitted a Social Media Application Business Plan and the Plan has been reviewed and approved by the CEO or designee. Each SMA used by a department/agency must either be approved as a County-sponsored SMA or must not be used to conduct County business.

### *2.1 Preexisting SMAs*

Some County departments/agencies already use SMAs to conduct County business. A preexisting SMA must become County-sponsored if either: 1) the SMA is used to conduct County business, or 2) the department/agency uses County resources (including staff time or equipment) to maintain or post to the SMA. All SMAs meeting either of these two criteria must follow the same process as new SMAs in order to become County-sponsored.

Within four months of the official adoption of this policy, all departments/agencies currently using SMAs that meet either of the two criteria above must complete the following steps for each SMA or cease those SMAs that do not follow this process. Departments/agencies may continue using SMAs for County business while actively completing the following steps.

#### *2.1.1 Complete the Social Media Application Business Plan*

The department/agency head or designee must complete the Social Media Application Business Plan and submit it to the Enterprise Content Management – Center of Excellence (ECM – CoE).



### *2.1.2 Work With the ECM – CoE to Address Concerns*

The department/agency must work with the ECM – CoE to address any concerns about the proposed SMA and make any alterations to the SMA necessary to ensure compliance with this policy.

### *2.1.3 Comply With This Policy Going Forward*

Once the ECM – CoE approves the SMA, the department/agency must continue to comply with this policy, including all provisions of section 2, regarding all activities related to County-sponsored SMAs.

## *2.2 Account Management for County-Sponsored SMA*

### *2.2.1 Prerequisite to Opening an Account for a County-Sponsored SMA*

Department/agency heads who want to establish an account on an SMA to conduct County business must first complete a Social Media Application Business Plan Form and submit it to the Enterprise Content Management – Center of Excellence (ECM – CoE). The ECM – CoE, or any other CEO designee, may request additional information, if needed, before approving the plan. (*Refer to User Responsibility Statement 2.2, 2.3.*)

### *2.2.2 Terms of Service and Terms of Use*

There may be legally binding agreements associated with using external services, and County Counsel must review those agreements or similar Terms of Use (TOU) or Terms of Service (TOS) prior to a Department indicating "agreement," even if this involves simply clicking on a button that says, "I agree." Typically, these online agreements are designed for the general user rather than for an organization. Some SMA services have special TOUs or TOSs that apply to government entities rather than to



individuals, and these may not be obvious from the service provider's website home page. County Counsel will review account agreements during the Social Media Application Business Plan approval procedure. *(Refer to User Responsibility Statement 2.2, 2.3.)*

### *2.2.3 Provide the County-Sponsored SMA Account and Password to the CIO or the CIO's Designee*

Within 24 hours of creating a County-sponsored SMA, the Authorized Agent shall provide account login and password information to the CIO or the CIO's designee. Within 24 hours of subsequent changes to login and password, the Authorized Agent shall again provide login and password information to the CIO or the CIO's designee. The primary concerns addressed by requiring departments/agencies to provide the login and password information to the CIO or the CIO's designee are: 1) to provide a safeguard in the event that the Authorized Agent leaves the County or the page is hacked, and 2) to ensure the County maintains ownership over the SMA and the SMA's content.

#### *2.2.3.1 Exception for Departments/Agencies with Special Circumstances*

Departments/agencies may request an exception to the requirement of providing the login and password information to the CIO or the CIO's designee. Departments/agencies seeking such an exception must submit a request in writing to the Enterprise Content Management – Center of Excellence (ECM – CoE), which will review such requests on a case-by-case basis. The request must provide the reasons why the department/agency seeks the exception, as well as provide an alternate solution that addresses both of the primary concerns listed in section 2.2.3. The ECM – CoE shall have the discretion to approve or deny a request for exception based on the sufficiency of both the department's/agency's reasons for the exception and the department's/agency's proposed solution. A department or





Authorized Agent that disagrees with the ECM – CoE’s decision may appeal to the CEO or the CEO’s designee, who will have the authority to make a final determination.

### *2.3 Acceptable Conduct on County-Sponsored SMAs*

#### *2.3.1 County-Sponsored SMAs for County Business Use Only*

County-sponsored SMAs shall be used solely for County business, and may not be used for personal purposes. County-sponsored SMAs shall not: be used to express personal views or for commercial purposes; provide personal or political commentary; or present information that is not directly relevant to the business purpose of the County-sponsored SMA. County-sponsored SMAs that allow viewers to post content may not restrict employees/affiliates from posting, provided that they post only during personal, non-work time, using their own resources, following confidentiality, privacy and other applicable policies and laws. (*Refer to User Responsibility Statement 2.2, 2.3.*)

#### *2.3.2 Employee/Affiliate in Role of Authorized Agent for County Business*

As part of a specific job-related function to represent a department/agency, an employee/affiliate may be an Authorized Agent to implement, maintain, and manage content for one or more County-sponsored SMAs. The employee/affiliate in the role of Authorized Agent must agree to the parameters for the SMA as set forth in the Social Media Application Business Plan, including anticipated duration and time required for the Authorized Agent role.

#### *2.3.3 Authorized Spokesperson*





Before responding to a media representative, the respondent must be authorized as a spokesperson. For example, a member of the traditional or non-traditional online media (including bloggers) might contact a County employee/affiliate who is an Authorized Agent concerning County business, operation, policies, practices, or strategic commitments. Before responding, the Authorized Agent must follow his or her department's/agency's policies and procedures for responding to press inquiries. If a department/agency Authorized Agent is authorized by the County or department/agency PIO to serve as an official department/agency spokesperson, the employee/affiliate must clearly self-identify as a spokesperson for that County department/agency, and clearly state his/her level of expertise. *(Refer to User Responsibility Statement 1.13.)*

### *2.3.4 Report Inappropriate Use of County-Sponsored SMAs*

Authorized Agents who have concerns regarding workplace conduct or inappropriate use of County-sponsored SMAs are encouraged to contact their immediate supervisor or Labor Relations Representative. *(Refer to User Responsibility Statement 1.16, 1.17.)*

## *2.4 Content on County-Sponsored SMAs*

### *2.4.1 Appropriate Content*

The department/agency head is responsible for all content posted by the department's/agency's Authorized Agent on behalf of that department/agency. Content posted by the department/agency must conform to all County and department/agency policies regarding the appropriateness of the material, privacy and confidentiality standards, and meet all applicable legal requirements. *(Refer to User Responsibility Statement 1.16, 1.17.)*



#### *2.4.2 Consistent Content Across County-Sponsored Websites, Portal, and SMAs*

A department/agency PIO, if there is one, or the department's/agency's Authorized Agent will monitor County content across department/agency sites to ensure a consistent department/agency message is conveyed. The County recommends that County-sponsored SMAs using the same application be co-located under a "County of Santa Clara" heading. The County CEO or designee reserves the right to direct departments/agencies to modify County-sponsored SMAs based on best practices and industry norms. *(Refer to User Responsibility Statement 1.16, 1.17.)*

#### *2.4.3 Departmental/Agency SMA Content Does Not Substitute for Portal Content*

A County-sponsored SMA does not replace or substitute for content posted on the department/agency's County website. The County department/agency head or designee will ensure that department/agency content on the County-sponsored portal, websites, and SMAs is generally consistent with other department/agency messaging and accurate. A department/agency's County-sponsored SMA must include a link to the department/agency's page on the County's public portal. *(Refer to User Responsibility Statement 1.16, 1.17.)*

#### *2.4.4 Official Spokesperson or Personal Opinion*

Unless an individual is serving as an Authorized Agent that is designated as an official spokesperson for a County organization, any online communications made by an employee/affiliate are to be considered that individual's personal opinions. *(Refer to User Responsibility Statement 1.16, 1.17.)*



### *2.4.5 Content Ownership*

All content posted on behalf of the County or a County department/agency, or content posted using County resources (such as equipment or staff), shall be owned by the County of Santa Clara. This includes content created by an Authorized Agent or any other employee/affiliate, whether during work time or outside of work time, that is posted on behalf of the County or a department/agency on any SMA. Content created by an employee/affiliate during non-work hours, without using County resources and not subsequently posted on behalf of the County on an SMA, is owned by the employee/affiliate. *(Refer to User Responsibility Statement 1.16, 1.17.)*

### *2.4.6 Allow the SMMT to Moderate Comments or Do Not Allow Comments*

A County-sponsored SMA may either a) allow viewers to post comments or other materials and moderate those comments only on the advice of the Social Media Monitoring Team (SMMT), or b) not allow viewers to post or comment.

Removing, deleting, hiding, editing, or otherwise altering any comment or posting poses potential risk that the County will infringe on another's right to engage in free speech. To minimize the possibility of denying free speech, only members of the SMMT will have the authority to grant permission to moderate or delete postings on a County-sponsored SMA. Neither Authorized Agents nor department/agency heads may moderate postings without the express permission of the SMMT. All departments/agencies must comply with the SMMT's decision regarding whether to keep or moderate postings.

If viewers are allowed to post comments, videos or other materials on a County-sponsored SMA, the following disclaimer must be conspicuously posted on the County-sponsored SMA to the extent possible by the SMA:



*The comments posted on this website are moderated. All content posted by Public Users must be limited to the topic originally posted. Content that is beyond the scope of the original topic will not be posted, or will be removed as soon as possible.*

*The County does not discriminate on the basis of viewpoints or opinions expressed. Only content that complies with the following content guidelines will be posted. The following types of content submitted by a Public User will NOT be posted or will be removed:*

- *Content beyond the scope of the original topic posted by the County*
- *Use of profanity or obscene language*
- *Content promoting personal profit, including commercial solicitation or conducting or pursuing personal business interests*
- *Content endorsing, or appearing to endorse, commercial products, services, or companies*
- *Content endorsing any person campaigning for election to a political office or promoting or opposing any ballot measure or proposition*
- *Content in violation of intellectual property laws, including but not limited to posting licensed material without authorization, or posting copyrighted material without the publisher's permission*



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- *Disseminating hoaxes, chain letters, or advertisements*
- *Sexually oriented messages or images*
- *Conduct or encouragement of illegal activity*
- *Information that may compromise the safety or security of the public or public systems*
- *Personally identifiable information, such as phone numbers or addresses*

*Content posted on County websites will in no way constitute a legal or official notice to the County or any official or employee/affiliate of the County for any purpose.*

*The County recognizes that social media tools such as this site are available 24 hours a day. However, given the need to manage resources, the comments on this page are generally moderated only during normal business hours, from 8 a.m. to 5 p.m., Monday through Friday. Comments posted outside of normal business hours will be read and appropriate action will be taken as soon as possible. In most cases, this will occur within the next business day.*

This disclaimer shall serve as the guidelines for the SMMT members to determine which comments are inappropriate and should be removed. A comment falling within any of these categories shall be deemed inappropriate and shall be removed. If a comment questionably falls within one of these categories, the SMMT members shall consult with each other and with County Counsel to determine by consensus whether the comment should be deemed inappropriate, and the decision reached shall be noted and applied consistently to future similar comments.



When the SMMT and County Counsel determine that removal of the comment is appropriate, the SMMT member shall grant permission to the Authorized Agent of the SMA to delete the comment. The Authorized Agent must remove the comment as soon as possible. Additionally, the Authorized Agent must notify the user who posted the comment, if possible, by sending the user the following statement:

*Your post is in violation of the County of Santa Clara's Social Media Policy and has been removed. Please refer to the disclaimer posted on the social media site and refrain from posting inappropriate content in the future. If you do not refrain from posting such content, we will block you from further posts.*

If a user posts more than one inappropriate comment, the SMMT member shall grant permission to remove subsequent inappropriate comments as described above and shall grant permission to the Authorized Agent to block the user from making further posts. The Authorized Agent must block the user as soon as possible. Additionally, the Authorized Agent must notify the user who is blocked, if possible, by sending the user the following statement:

*Your post is in violation of the County of Santa Clara's Social Media Policy and has been removed. Because this is a repeat violation, we have blocked you from further posts.*

### *2.4.7 With Prior Permission, Provide Emergency Comment Moderation When Necessary*

The County recognizes that some departments/agencies operate 24 hours a day, seven days a week. These departments/agencies may continue posting to SMAs and engaging with the public through SMAs after typical business hours and on weekends. Departments/agencies with a legitimate



business need to post to SMAs outside of normal business hours may request prior approval to moderate comments without permission from the SMMT during times when the SMMT is not available to immediately respond to problematic postings. This request must be made in writing to the Enterprise Content Management – Center of Excellence (ECM – CoE). The ECM – CoE has the discretion to grant or deny such a request, and approval of any such request shall be subject to all terms and conditions listed in section 2.4.7.1 of this policy. A department or Authorized Agent that disagrees with the ECM – CoE’s decision may appeal to the CEO or the CEO’s designee, who will have the authority to make a final determination.

*2.4.7.1 Terms and Conditions of Prior Permission*

Upon approval of a department’s/agency’s request for prior permission to perform emergency comment moderation when the SMMT is not available, the department/agency Authorized Agent shall have permission to moderate comments subject to this policy after business hours and on weekends, subject to the following terms and conditions:

- a) The department/agency requesting prior permission must regularly conduct County business on SMAs after business hours and/or on weekends, *and* the department/agency must have a legitimate need to immediately moderate comments. Generally, departments/agencies meeting this requirement will be departments/agencies that serve a law enforcement, public health, or emergency services function, including, but not limited to:
  - i. District Attorney’s Office
  - ii. Office of Emergency Management
  - iii. Mental Health Department





- iv. Department of Alcohol and Drug Services
  - v. Public Health Department
  - vi. Behavioral Health Services Department
  - vii. Sheriff's Office
  - viii. Santa Clara Valley Medical Center
- b) The Authorized Agent may only moderate comments that violate the SMA's comment policy (see section 2.4.6 of this policy).
- c) Upon noticing a comment that requires immediate moderation, the Authorized Agent must perform all of the following:
- i. Immediately notify the SMMT via email of the comment and the action that Authorized Agent intends to take.
  - ii. Take action immediately to delete, remove, hide, edit, alter, or otherwise moderate the comment in a manner consistent with past actions taken on similar comments.
  - iii. Keep a record of the comment and the Authorized Agent's action so that similar actions can be taken in the future and so that County Counsel can review the action if necessary.
- d) The department/agency must provide at least one employee to serve on the SMMT on a regular basis.





## *2.5 Responsibilities*

### *2.5.1 Department/Agency Heads*

#### **Responsible for content posted by Authorized Agents**

Department/agency heads are ultimately responsible for all content posted by the Authorized Agents on behalf of the County or their department/agency, and for monitoring the site to ensure it remains secure (not "hacked"). Departments/agencies must appoint one or more Authorized Agents to regularly monitor the SMA, either continuously or during normal business hours, to ensure that the site remains secure. The department/agency head may appoint himself or herself as the Authorized Agent. For an SMA that accepts postings (for example, comments or video) from viewers, department/agency heads must ensure that the Authorized Agent will participate on the Social Media Monitoring Team (SMMT) if requested by the Enterprise Content Management – Center of Excellence (ECM – CoE). In addition to the County moderating criteria in section 2.4.6 of this policy, if a site accepts postings, and a post violates the rules of the SMA vendor (e.g., a comment posted on a Facebook page that violates Facebook's terms), the Authorized Agent may notify the vendor of the violation.

#### **Responsible for department/agency-specific SMA policies**

Department/agency heads may develop additional social media policies that do not conflict with this SMA policy and that further address specific departmental concerns or requirements.

#### **Responsible for complying with Records Retention Schedules**

Department/agency heads are responsible for complying with all applicable County records retention policies and schedules. View the County's Record Retention and Destruction Policy – Board Policy 3.57 at



<https://saecommon.sccgov.org/countypolicy/Board-Policy-3.57-Record-Retention-and-Destruction.pdf>.

### *2.5.2 CEO or CEO's Designee*

The CEO or the CEO's designee is responsible for publicizing the value of the Social Media Application Business Plan process. The CEO or the CEO's designee is responsible for ensuring that the designee has the authority to direct departments/agencies to modify County-sponsored SMAs to conform to County policies, to mitigate security risks, to evaluate any legal implications of the planned use of SMAs, and to ensure consistency in the use of County-sponsored SMAs. The CEO or the CEO's designee is also responsible for hearing appeals from departments regarding ECM – CoE decisions and shall have the authority to make a final determination on any such issue.

### *2.5.3 CIO or CIO's Designee*

The CIO or the CIO's designee is responsible for ensuring that department/agency Social Media Application Business Plans include appropriate SMA software, hardware and security procedures, and allocated department/agency staff resources. The CIO or the CIO's designee will assist the department/agency Authorized Agent in the event of a security or other technical issue.

### *2.5.4 County Counsel or County Counsel's Designee*

The County Counsel or the County Counsel's designee is responsible for ensuring that department/agency Social Media Application Business Plans conform to all County policies regarding the appropriateness of the material, privacy and confidentiality standards, and meet all applicable legal requirements.



### *2.5.5 Enterprise Content Management – Center of Excellence (ECM – CoE)*

The ECM – CoE has been designated to accept, review, and approve all Social Media Application Business Plans. The ECM – CoE also has the authority to make requests of departments/agencies to ensure compliance with all County policies associated with SMAs. Additionally, the ECM – CoE administers the Social Media Monitoring Team (SMMT).

### *2.5.6 Labor Relations or Labor Relations' Designee*

The Office of Labor Relations or the Office of Labor Relations' designee is responsible for ensuring that department/agency Social Media Application Business Plans conform to all Contract language, Meyers-Miliias-Brown Act (MMBA) and meet all applicable contractual requirements, including labor agreements.

### *2.5.7 County PIO and Department/Agency PIOs or Authorized Agent*

A department/agency PIO, if there is one, or the department's Authorized Agent is responsible for ensuring a consistent message and branding across the department/agency websites, portal sites and SMAs.

### *2.5.8 Social Media Monitoring Team (SMMT)*

SMMT members shall review each comment posted to County-sponsored SMAs, determine inappropriate comments based on the criteria listed in section 2.4.6 of this policy, consult with the other SMMT members and County Counsel regarding questionable comments that may or may not be inappropriate, grant permission to Authorized Agents to remove comments determined to be inappropriate, grant permission to Authorized Agents to block users who continue to post inappropriate comments after being



warned, and ensure that Authorized Agents obey SMMT directions. As able, SMMT members shall also notify Authorized Agents of comments warranting a departmental response.

The SMMT shall also be responsible for responding to comments from users specifically addressing the removal of a comment. Should any disputes arise regarding the removal of a comment, the SMMT shall consult County Counsel to determine an appropriate response.

### **3. Social Media Applications Not Sponsored County**

The [Santa Clara County Information Technology User Responsibility Statement](#) applies to any employee/affiliate use of SMAs that are not sponsored by the County.

#### *3.1 Content Posted by an Authorized Agent on Non-County Sponsored SMAs*

##### *3.1.1 Content Created by Authorized Agents Posted on Non-County Sponsored SMAs*

Content created by an Authorized Agent and posted on an SMA for County business must be consistent with County policies, and comply with all applicable laws and regulations, including confidentiality and privacy laws. *(Refer to User Responsibility Statement 1.16, 1.17, 1.18, 2.2, 2.3, 2.4.)*

##### *3.1.2 Content Ownership on Non-County Sponsored SMAs*

All content posted on behalf of the County or a County department/agency shall be owned by the County of Santa Clara. This includes content created by an Authorized Agent or any other employee/affiliate, whether during work time or outside of work time, that is posted on behalf of the County or a department/agency on any SMA. Content created by an



employee/affiliate during non-work hours, without using County resources and not subsequently posted on behalf of the County on an SMA, is owned by the employee/affiliate. (*Refer to User Responsibility Statement 1.16, 1.17, 1.18, 2.2, 2.3, 2.4.*)

### 3.2 *Responsibilities for Non-County Sponsored SMAs*

#### 3.2.1 *Department/Agency Heads*

##### **Responsible for establishing departmental/agency SMA access policy**

Department/agency heads may establish a department/agency SMA access policy that applies during work time, and during non-work time using County-owned resources. During work time or while using County resources, the employee's/affiliate's use of SMAs for personal interest is at the discretion of the department/agency head and/or supervisor, provided that the use does not otherwise violate the County's Merit System Rules, policies, labor agreements, or applicable laws. (*Refer to User Responsibility Statement 2.1, 2.2.*)

##### **Responsible for content posted on non-County-sponsored SMAs**

A department/agency head who appoints a County employee/affiliate as an Authorized Agent to post content for County business on a non-County-sponsored SMA is ultimately responsible for that content.

##### **Responsible for complying with Record Retention Schedules**

If a department/agency head approves an employee/affiliate's use of non-County-sponsored SMA to conduct County business, the department/agency head is responsible for complying with the department/agency record retention policy and schedules. Complying with the County's record retention policies and state law may require departments/agencies to retain records hosted on SMAs other than County-sponsored SMAs.



### *3.2.2 All County Employees/Affiliates*

All County employees/affiliates must follow the Santa Clara County [Information Technology User Responsibility Statement](#) when accessing, using, or viewing SMAs. Whenever possible, County employees/affiliates shall use an official, County-approved account when posting on an SMA as an Authorized Agent. Whenever possible, County employees/affiliates shall use a personal account when posting on an SMA in any capacity other than as an Authorized Agent or spokesperson for the County or a department/agency.

## **4. Related County Documents**

County documents listed and linked here are related to this Social Media Application Policy. All County policies and State and Federal legislation apply, even if not listed here.

### *4.1 County of Santa Clara Social Media Application User Guide*

Written primarily for department/agency heads, SMMT members, and Authorized Agents who will implement and maintain County-sponsored SMA, the Social Media Application User Guide is available as a comprehensive guide covering all aspects of County SMA use, as well as abridged guides focusing on key issues or responsibilities.

### *4.2 Social Media Application Business Plan Form*

Department/agency heads should complete a Social Media Application Business Plan Form and submit it to the CEO or designee **prior to** the County agency or department using or implementing any SMA. Departments/agency heads who implemented an SMA before this policy



went into effect also must complete a Social Media Business Plan Form within 4 months of this policy's effective date.

#### 4.3 [County of Santa Clara Information Technology Security Policies](#)

The comprehensive security policy document is available in full and abridged versions at <https://saecommon.sccgov.org/countypolicy/Information-Technology-Security-Policies.pdf>. Note that Section 18.0, relating to Electronic Records Retention, specifies that department/agency management is responsible for developing a records retention schedule, as well as establishing guidelines for retaining and deleting Business Electronic Records, and ensuring that users are aware of these guidelines. View the County's Record Retention and Destruction Policy – Board Policy 3.57 at <https://saecommon.sccgov.org/countypolicy/Board-Policy-3.57-Record-Retention-and-Destruction.pdf>.

#### 4.4 [Santa Clara County Information Technology User Responsibility Statement](#)

All County employees/affiliates are required to sign this Statement if they use County information technology resources. The Information Technology User Responsibility Statement is available at <https://iservices.sccgov.org/sccurds>.

#### 4.5 [County of Santa Clara, Information Privacy Policy \(for the Public\)](#)

This policy addresses what personal information is collected about visitors to the [SCC public portal](#) (not the employee portal); how private information is held; how it will be used; and under what conditions this information may be shared or released. The policy is available at <http://www.sccgov.org/sites/scc/Pages/Privacy-Policy.pdf>.





4.6 [County of Santa Clara, Security Policy \(for the Public\)](#)

This policy is located on the [SCC public portal](#) (not the employee portal) and addresses the measures taken to safeguard the integrity of the County's telecommunications and computing infrastructure, including but not limited to authentication, monitoring, auditing, and encryption. The policy is available at <http://www.sccgov.org/sites/scc/Pages/Security-Policy.pdf>.

4.7 *Office of the County Counsel, Client Legal Guide*

See, specifically, Section 6 relating to Confidentiality of Records, and Section 8 relating to the California Public Records Act (CPRA). The Client Legal Guide is available at [\[url\]/sites/cco/Client%20Legal%20Guide/Pages/home.pdf](#).

**5. Summary of Social Media Policy for Authorized Agents**

For those County employees/affiliates who are not assigned to use SMAs to conduct County business, the Santa Clara County [Information Technology User Responsibility Statement](#) and other existing policies, legislation and agreements cover employee/affiliate conduct for using SMAs.

Authorized Agents assigned to use SMAs for conducting County business must abide by the specific policies regarding SMAs, as well as existing legislation, policies, and agreements. The Santa Clara County [Information Technology User Responsibility Statement](#) specifies that when conducting County business, County employees/affiliates may not configure, access, use or participate in any internet-based communication or data exchange service (including "social networking services") unless express written permission has been given by department/agency management.





The key points of this Social Media Application Policy for Authorized Agents who use Social Media Applications to conduct County business are:

**Do not use personal Social Media Applications and accounts to conduct County business**, unless approved by the department/agency head.

**Establish a County-sponsored account on each SMA using a County-issued email account, and use that account to manage the County-sponsored SMA.**

**Provide the username and password for all County-sponsored SMAs to the County CIO or designee.**

**If you have concerns regarding workplace conduct or inappropriate use of SMA**, you are encouraged to contact your immediate supervisor or Labor Relations representative.

**Protect confidential personal information.** Communications posted on SMAs must never contain material that directly or indirectly discloses information that is protected by law, such as health information (including patient identities), criminal history data, or information that could potentially be used for identity theft (such as Social Security numbers, birthdates, driver's license numbers, or credit card numbers).

**Keep proprietary information secret.** SMAs must never contain proprietary or trade-secret information.

**Keep social media use professional.** When using SMAs for County business interests, do not post any material that is obscene, defamatory,



profane, libelous, threatening, harassing, discriminatory, abusive, hateful or humiliating to another person or entity.

**Obtain permission to post copyrighted material, images or conversations where individuals are identifiable, or information regarding minors without written legal permission.** Authorized Agents must refrain from posting any copyrighted materials, photos, and conversations whether written, audio, video, image, graphical or any other electronic form, unless appropriate written permission has been obtained from the owner of the copyright, from an individual who is identifiable in image or conversation, or from a parent or guardian if the subject of the image, video or text is under the age of 18.

**Protect users' free speech rights.** Obtain permission from the Social Media Monitoring Team (SMMT) before moderating or deleting comments or other postings. If you have received prior permission to perform emergency comment moderation, follow all the terms and conditions in this policy. If you are a member of the SMMT, follow the posting moderation criteria in this policy.

**Uphold employee/affiliate legal rights.** This SMA Policy does not restrict County employees' or affiliates' legal rights under California laws or federal laws to hold discussions or participate in activities relating to their terms or conditions of employment, including wages, hours and working conditions.

**Follow accessibility guidelines under Section 508.** County-sponsored SMAs must provide accessible content by complying with [Section 508 of the Federal Rehabilitation Act](#) to ensure that people with visual and hearing disabilities can use the site effectively.

**Follow Record Retention Schedule and management policies.** Comply with all applicable County record retention and record management



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policies. View the County's Record Retention and Destruction Policy – Board Policy 3.57 at <https://saecommon.sccgov.org/countypolicy/Board-Policy-3.57-Record-Retention-and-Destruction.pdf>.

### **Comply with the Children's Online Privacy Protection Act (COPPA).**

When a County-sponsored SMA collects personal information from children under 13 years of age, department/agency employees/affiliates need to comply with the Children's Online Privacy Protection Act (COPPA).

*The above summary points are provided solely for convenience and do not supersede any section of the Social Media Policy.*

APPROVED:

Administrative Policy Council: \_\_\_\_\_  
Sylvia Gallegos, Dep. County Executive    Date

County Executive: \_\_\_\_\_  
Jeffrey V. Smith, County Executive    Date

### **Procedures**

See the Social Media Application User Guide for procedures regarding submitting a Social Media Application Business Plan, moderating comments with the advice of the Social Media Monitoring Team (SMMT), and avoiding legal issues.

### **Definitions**

See [Section 1.7](#), above.



## **Frequently Asked Questions**

1) **Does the County Social Media Application Policy ban social media sites for departments/agencies?**

No. The policy encourages departments/agencies to consider using these powerful tools, but it is up to the individual department head whether to actually use social media sites. The policy requires department/agency executives to consider the risks and benefits involved. The policy also provides guidelines to ensure that departments/agencies use social media responsibly and legally.

2) **Does the County Social Media Application Policy require departments/agencies to use social media sites?**

No. Again, the policy only encourages departments/agencies to use social media tools as appropriate, but leaves it up to department/agencies executives to choose whether or not to actually engage in social media activities.

3) **Is this policy designed to stop County employees/affiliates from using SMAs at work?**

No. The Santa Clara County [Information Technology User Responsibility Statement](#), which all employees must sign, regulates what personal internet activities are appropriate for employees. The Social Media Application Policy focuses on departments/agencies using social media and leaves it up to individual department/agency to ensure that employees are using technology appropriately.

4) **Why can't County departments/agencies and employees/affiliates use SMAs however they want?**



It's up to individual departments/agencies to determine whether or not to allow their employees to access Social Media Applications during work hours. When County departments/agencies officially engage in social media, however, the law puts special burdens on County departments/agencies to ensure that they do not violate other users' rights. The County Social Media Application Policy guides departments so they do not accidentally violate these laws or infringe on the rights of others.

5) **Someone posted a comment that is offensive, and my boss told me to take it down. Can I remove it?**

No. Government agencies, including County departments/agencies, must take extra care to avoid infringing on others' freedom of speech. The County can only remove comments that meet certain criteria. This is why we have established the County Social Media Monitoring Team (SMMT), whose members will be trained in properly determining when a comment can be legally removed. If you see a comment that you think should be removed, notify the SMMT or the Enterprise Content Management – Center of Excellence (ECM - CoE), and they will evaluate it and instruct you on the appropriate action to take. Regardless of whether or not the SMMT grants permission to remove the comment, you and your department are welcome to respond, keeping in mind the best practices in this guide. You may also contact County Counsel to help you develop an appropriate response. *Remember, the only instance when a department Authorized Agent is allowed to moderate comments without SMMT approval is when that Authorized Agent has previously been granted prior permission to perform emergency comment moderation.*

6) **My department originally decided to allow comments, but now we have changed our mind. Can we block all comments?**



Generally, no. Departments/agencies must obtain permission from and follow the advice of County Counsel before blocking all comments after previously allowing them. Because County departments/agencies must not take actions that appear to the public that the County is trying to suppress free speech, departments/agencies cannot choose to block comments just because they start to receive negative feedback. Even if a department/agency has an appropriate reason to begin blocking all comments, such as receiving too many comments to respond to in a timely manner, the public may think that the County blocked comments because of criticism. This is why departments/agencies must work with County Counsel to properly block comments without creating the perception that the County is infringing on the public's free speech rights.

7) **My department already used an SMA before the Social Media Application Policy went into effect. What do we have to do to get our SMA approved?**

Like new social media sites, each existing social media site must also be approved by the Enterprise Content Management – Center of Excellence (ECM – CoE). Your department/agency must fill out the Social Media Application Business Plan and submit it to the ECM – CoE for approval. The ECM – CoE may require your department/agency to make changes to your social media site in order to ensure that it complies with the Social Media Application Policy. Once the ECM – CoE approves your Business Plan, your social media site becomes a County-sponsored Social Media Application. You may continue using the social media site while the ECM – CoE is reviewing your Business Plan, but your department/agency must cease activity on any social media sites for which you have not submitted a plan or for which your plan was not approved. See the Social Media Application User Guide Part II: A Guide for Existing Social Media Pages for more information.



**8) Does my department/agency have to provide our login and password information to the CIO?**

Yes, unless your department/agency has been granted an exception. The County recognizes that some departments/agencies may be bound by law to keep social media login information secure or have already instituted best practices to protect their social media sites. To address these situations, the Social Media Application Policy includes an exception to the requirement to provide login and password information to the CIO. Your department may request an exception to the policy by filling out the relevant information on the Social Media Application Business Plan Form and submitting it to the Enterprise Content Management – Center of Excellence (ECM – CoE). This request must also explain your department’s best practices for safeguarding the login and password information, as well as ensuring that the County can retain control of the social media page if your Authorized Agent leaves County service.

**9) Does the County own all the photos, text, videos, and other content I post?**

The County is considered the owner of any content that was either 1) created using County resources, including staff time and County computers or equipment, or 2) is posted on any social media application on behalf of the County or a County department/agency.

**10) How do I become a member of the Social Media Monitoring Team (SMMT)?**

Contact the Enterprise Content Management – Center of Excellence (ECM – CoE) at [smt@ceo.sccgov.org](mailto:smt@ceo.sccgov.org) to learn how you can get involved.





11) **Before this policy was implemented, I moderated the comments on my department's/agency's SMA page. Do I have to stop?**

Yes. Because of the legal risks involved, only the Social Media Monitoring Team (SMMT) may grant permission for departments/agencies to remove or otherwise moderate comments. You may not remove, hide, delete, edit, or alter any comments without the express permission of the SMMT, even if the comment is obviously inappropriate. If your department operates 24/7, you may apply for an exception to this rule by filling out the relevant information on the Social Media Application Business Plan Form and submitting it to the Enterprise Content Management – Center of Excellence (ECM – CoE). If you have experience moderating comments, your expertise would be extremely helpful to the SMMT. Contact the ECM – CoE at [smmt@ceo.sccgov.org](mailto:smmt@ceo.sccgov.org) to get involved with the SMMT. See the Social Media Application User Guide Part II: A Guide for Existing Department Social Media Pages for more information about departments that used social media before the implementation of this policy. *Remember, the only instance when a department Authorized Agent is allowed to moderate comments without SMMT approval is when that Authorized Agent has previously been granted prior permission to perform emergency comment moderation.*

12) **My department uses SMAs after hours and on weekends. What can we do if we see a comment that must be removed on a weekend or when the Social Media Monitoring Team (SMMT) is not available?**

Departments that use social media during non-business hours may request prior permission to moderate comments in an emergency situation. The department must complete the relevant portions of the Social Media Application Business Plan Form and submit it to the ECM – CoE. When moderating comments, an Authorized Agent with prior permission must ensure that removal of comments is in accordance with the Social Media





Application Policy (see [section 2.4.6](#)) and the Authorized Agent follows these steps:

- Notify the SMMT of the comment and your intended action
- Take action immediately
- Keep a record of the comment and your actions so that similar actions can be taken in the future and so that County Counsel can review the action if necessary

In addition to following the rules above, if your department receives prior permission to remove comments on an emergency basis, your department must provide at least one employee to serve on the SMMT on a regular basis.

*Remember, the only instance when a department Authorized Agent is allowed to moderate comments without SMMT approval is when that Authorized Agent has previously been granted prior permission to perform emergency comment moderation.*

This policy, in its original format, can be found at  
[url]/sites/policies/FormsrelatedtoPolicies/SCC-Social-Media-Policy.pdf

### **Related Policies**

- Board Policy 3.37 – Internet Usage -  
<https://saecommon.sccgov.org/countypolicy/Board-Policy-3.37-Internet-Usage-Policy.pdf>
- Information Technology Security Policies -  
<https://saecommon.sccgov.org/countypolicy/Information-Technology-Security-Policies.pdf>



- Information Technology User Responsibility Statement -  
<https://iservices.sccgov.org/sccurds>
- Board Policy 3.57 - Record Retention and Destruction Policy -  
<https://saecommon.sccgov.org/countypolicy/Board-Policy-3.57-Record-Retention-and-Destruction.pdf>

### **Related Forms and Information**

- County Counsel Client Legal Guide -  
[url]/sites/cco/Client%20Legal%20Guide/Pages/home.pdf
- Social Media Application Business Plan -  
[url]/sites/policies/FormsrelatedtoPolicies/SCC-Social-Media-Application-Business-Plan-Form.pdf
- Social Media Application Flow Charts (Complete) -  
[url]/sites/policies/FormsrelatedtoPolicies/Social-Media-Flow-Charts-Complete.pdf
  - Steps for New Social Media Pages (Handout #1) -  
[url]/sites/policies/FormsrelatedtoPolicies/Steps-For-New-Social-Media-Pages-Flow-Chart.pdf
  - Moderating Comments with the SMMT (Handout #2) -  
[url]/sites/policies/FormsrelatedtoPolicies/Moderating-Comments-With-The-SMMT-Flow-Chart.pdf
  - Moderating Comments on Your Own (Handout #3) -  
[url]/sites/policies/FormsrelatedtoPolicies/Moderating-Comments-On-Your-Own-Flow-Chart.pdf



- SMMT Process (Handout #4) -  
[url]/sites/policies/FormsrelatedtoPolicies/SMMT-Process-Flow-Chart.pdf
- Necessary Components Chart (Handout #5) -  
[url]/sites/policies/FormsrelatedtoPolicies/Necessary-Components-Chart.pdf
- List of Inappropriate Comments (Handout #6) -  
[url]/sites/policies/FormsrelatedtoPolicies/List-of-Inappropriate-Comments.pdf
- Social Media Application Policy Training PowerPoint Presentation -  
[url]/sites/policies/FormsrelatedtoPolicies/Social-Media-Application-Policy-Training-Presentation.pdf

## History

Date	Changes Made
5/16/2019	Social Media Monitoring Team email address updated. (David Bruno)
10/7/2017	Links updated. (David Bruno)
6/29/2015	References to <a href="#">Board Policy 3.57 – Record Retention and Destruction Policy</a> updated. (John Myers)
9/19/2014	Flow charts and Training PowerPoint Presentation added. (John Myers)
6/9/2014	Policy uploaded. (John Myers)
5/23/2014	Policy adopted.