



# Social Media Communications Policy

<b>Original Effective Date:</b> August 24, 2017	<b>Review / Revision Date:</b>	<b>Board of Health Resolution:</b> 2017.08.112
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**Maintenance Steward:** Public Information Officer      **History:**  New    Revised    Archived

**Organizational Scope:**

Full Agency    Administration    Community Services    Environmental Health    Health Services

**Frequency of Review:**

Annually    Biennially    5 Years    As Needed    Other:

**Location:**

G-Drive: G: → Users → Common → Policies & Procedures

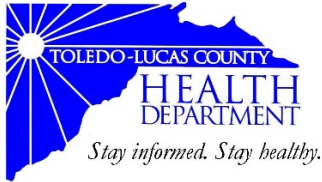
Website: [www.lucascountyhealth.com/employee-login/](http://www.lucascountyhealth.com/employee-login/)

Hardcopy: Policies & Procedures Manual in HR Office, PIO Office

Archived Version(s):

**Requisite Signatures**

- |  |                           |
|--|---------------------------|
| <input checked="" type="checkbox"/> <br>Board of Health President                             | <u>10/26/17</u><br>Date   |
| <input checked="" type="checkbox"/> <br>Health Commissioner                                   | <u>10/26/17</u><br>Date   |
| <input checked="" type="checkbox"/> Vacant<br>Director of Administrative Services  | <br>Date                  |
| <input checked="" type="checkbox"/> <br>Director of Environmental Health & Community Services | <u>10/25/2017</u><br>Date |
| <input checked="" type="checkbox"/> <br>Director of Health Promotion & Policy Integration     | <u>10/25/2017</u><br>Date |
| <input checked="" type="checkbox"/> <br>Director of Health Services                           | <u>10-25-17</u><br>Date   |
| <input checked="" type="checkbox"/> Vacant<br>Director of Human Resources  | <br>Date                  |



## Social Media Communications Policy

### I. Policy

It is the policy of the Toledo-Lucas County Health Department (TLCHD) that all interactions by employees through social media, both professionally and personally, are conducted in a professional and responsible manner consistent with Health Department policy.

### II. Scope

Employees who use social media for work-related purposes, as well as those who disclose their employment with TLCHD on their personal social media sites, are required to adhere to this policy.

### III. Purpose

The purpose of this policy is to provide TLCHD employees with guidance for participation in social media- including TLCHD-affiliated social media and non-TLCHD social media in which the employee's affiliation (i.e.: employment) with TLCHD is known, identified, or presumed- and to ensure continuous administrative oversight and consistency across agency social media accounts during vacations, sick time, or vacancies.

### IV. Guidelines for TLCHD Official Use:

#### A. Public Information Officer Responsibility

1. The Public Information Officer (PIO) is responsible for all agency social media pages, feeds, and platforms. Information Services (IS) will assist with developing future opportunities to effectively use live Internet-based communication
2. Should the PIO or person(s) designated to social media leave the agency, passwords will be changed.
3. Only the PIO, or designee, may send messages and/or respond to comments via agency social media platforms and create new pages, feeds, groups, etc. on social networks. The PIO will have the final say on selection of new social media tools with consultation from Information Services staff. Information Services carries responsibility for technical and security issues.

#### B. Standard Practices

1. Any individual designated to the agency's social media accounts will follow these practices:

- a. Protect sensitive or personal identifying information
- b. Monitor user comments (if enabled).
  - i. If a user submits a negative comment, the PIO should be notified promptly. No agency personnel with access to TLCHD's social media accounts shall respond to negative or aggrieved comments unless granted permission by the Health Commissioner or PIO.
- c. Maintain information accuracy
- d. Correct identified mistakes
- e. Be considerate
- f. Respect copyrights and trademarks
- g. Use work email addresses and strong passwords (e.g., alpha-numeric, upper and lower case, symbols, etc.)
- h. Avoid advertisements, sponsorships, and endorsements
- i. Stay within area of expertise
- j. Stay within scope of agency's role
- k. Avoid use for political purposes

### **C. Content Management**

1. Only content related to agency programs and available services will be distributed via the agency's social media channels. Examples include:
  - a. Announcements and discussions related to upcoming events, such as training programs, available services, workshops and awareness displays
  - b. Media releases
  - c. Links to videos explaining agency programs
  - d. Public service messages relating to public health topics and information

### **D. Branding**

1. All agency social media accounts will have a consistent look and feel, including use of the agency's logo.
2. Consult the *Visual Style Guide & Branding Practices* standard operating procedure for more information.

### **E. Implied Endorsements**

1. If possible, the agency's content will not appear next to advertisements or used in such a way that implies approval or support for all-encompassing material without prior approval from the PIO.

## **F. Monitoring**

1. The PIO shall closely monitor social media. He/she will view agency social networking pages at least once each weekday and periodically on weekends. The PIO will respond to Social Media inquiries within a reasonable amount of time.

## **G. Public Records**

1. Social media users should be aware that any type of communication on social media may be used as public record. No expectation of privacy arises from the use of agency information systems or social media sites which officially represent the agency. The agency reserves the right to monitor the use of agency information systems and hardware with or without prior notice.

## **H. Common Practice**

1. The following statement is posted to all of the agency's social media pages for which commenting is available:
  - a. "We welcome you and your comments to the Toledo-Lucas County Health Department [enter social media source] page."
2. Once Posted, TLCHD reserves the right to delete submissions that:
  - a. Contain vulgar language, personal attacks of any kind, or other offensive comments that target or disparage any ethnic, racial, or religious group
  - b. Are spam or include links to other sites;
  - c. Are clearly off-topic;
  - d. Advocate illegal activity;
  - e. Promote particular services, products, or political organizations;
  - f. Infringe on copyrights or trademarks;
  - g. Use personally identifiable information.
  - h. Contain client-specific and other confidential information.

## **I. Guidelines for Personal Use**

1. Employees are expected to adhere to TLCHD's policies when using or participating in social media. All the rules that apply to other TLCHD communications apply here, including client confidentiality, e-mail & internet use, photography and video, and media relations.
2. If authorized, employees may use social media during work hours for business-related reasons only. Property of TLCHD – including computers, online tools and web access – will be provided for authorized work purposes.

3. Employees may not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to TLCHD-hosted sites.
4. Employees shall not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For TLCHD's and our employees' protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.
5. Employees shall seek approval in writing from the PIO before setting up a TLCHD-affiliated online journal or other social media site.
6. Employees shall not use or disclose any client identifiable information of any kind on any social media without the express written permission of the client and prior approval for the PIO. Even if an individual is not identified by name, if there is reasonable basis to believe that the person could still be identified from that information, this could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and TLCHD policy.

## **J. Disclosure of Employment on Social Media**

### **1. Proprietary Information**

- a. Employees may not disclose any confidential or proprietary information of or about TLCHD, its affiliates, vendors or suppliers, including but not limited to business and financial information, represent that they are communicating the views of TLCHD, or do anything that might reasonably create the impression that they are communicating on behalf of, or as a representative of, TLCHD.

### **2. Self-Hosted Sites**

- a. Employees must refrain from saying or suggesting that the views and opinions they express related to the Health Department or health care topics represent the official views of TLCHD.
- b. **Write in the first person:** Where a connection to TLCHD is apparent, make it clear that you are speaking for yourself, and not on behalf of TLCHD. You should include this disclaimer:
  - i. "The views expressed on this [online journal, website] are my own and do not reflect the views of my employer." This language should be added to the "About me" section of an online journal or social networking profile where your employment with TLCHD is identified, known, or presumed.

- c. **Take responsibility:** Employees are personally responsible for the content on their social media sites and/or online journals. Be mindful that what you write will be public for a long time.
  - d. **Respect TLCHD's brand and reputation:** If your online journal, social media posts or comments or other online activities are inconsistent with, or would negatively impact TLCHD's reputation or brand, you should not refer to TLCHD or identify your employment to TLCHD. Each employee has a choice whether or not they disclose their employment status with TLCHD through social media. Employees who choose to disclose their employment with TLCHD in social media are required to adhere to the Social Media Communications policy.
  - e. **Coordinate business-related social media:** Some TLCHD staff members may be interested in engaging in internet conversations for work-related purposes, or may be asked by supervisors or leadership to participate, in support of TLCHD organizational objectives. Such engagement on behalf of TLCHD must be pre-approved in writing and coordinated through the employee's supervisor and the PIO.
3. Employee conduct on social media, whether in a professional or personal capacity, that adversely affects job performance, the performance of fellow co-workers, or otherwise adversely affects the general public, may result in disciplinary action up to and including termination.
- a. Employees are expected to adhere to the Health Department's *Ethics Policy, Computer, Network, & Internet Acceptable Use Policy, Department Issued Equipment Policy, Harassment & Violence Prevention Policy, Public Records & Retention Policy, Standards of Conduct Procedures, HIPAA regulations*, and all other applicable TLCHD policies and procedures.
  - b. Inappropriate postings regarding coworkers, supervisors, or the Health Department that are vulgar, obscene, or include discriminatory remarks, harassment, intimidation, threats of violence or similar inappropriate or unlawful conduct, or are otherwise in violation of the policies mentioned in part (a) above, will not be tolerated and may subject employees to disciplinary action up to and including termination.
  - c. Health Department policies, with respect to these prohibitions, apply to both off-duty (non-working hours) and on-duty (working hours) conduct.

## V. Maintenance

### A. Review

1. The *Social Media Communications Policy* is to be reviewed annually to ensure compliance with both agency and accreditation standards.
2. The Social Media policy may be reviewed more frequently as new forms of social media are created or grow in popularity.

### B. Revision

1. All changes made to this policy are to be noted on the **Record of Change**. Substantial changes will require renewed signatures from all applicable parties. This includes changes to the intent, scope, procedures, or policy statement.
2. Changes in style, format, grammar or minor error correction will not require renewed signatures but must be indicated on the Record of Change.

## VI. Glossary

- A. **Online Journal**: a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences. Also known as a blog.
- B. **Toledo-Lucas County Health Department Information**: information in any form or media that is created by or on behalf of TLCHD in the course and scope of its business, regardless of whether that information is maintained or stored by TLCHD or others on behalf of TLCHD. Examples of TLCHD information include, but are not limited to, client records, personnel records, financial information, company competitive information, and business e-mail messages.
- C. **Client Identifiable Information**: any individually identifiable information regarding a client of TLCHD collected, received, created, transmitted or maintained in connection with his/her status as a client, such as personal health information. Client Identifiable Information includes, but is not limited to, information about the client's physical or mental health, the receipt of healthcare, or payment for that care; name, address, Social Security Number, account number, information from or about transactions, driver's license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other personal identifiers.
- D. **Social Media**: includes but is not limited to online journals, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences, video sharing (i.e., You Tube) and social networks such as Twitter and Facebook.

**Record of Change**  
(Required for all policies)

Date of Change	Changes Made By	Changes Made/Notes	Approved By