

# Social Media

## Purpose

To establish standards and procedures for use of social media sites by TRS. TRS has a social media presence for the general discussion of TRS' pension plan, health benefit programs and TRS' administration and operations. TRS' social media presence is not an open public forum; however, to encourage engagement, TRS and participant posts on retirement and other content related to TRS' mission will be allowed at the discretion of authorized administrators. While authorized administrators may also answer general member questions, these forums are not intended for discussion of individual member or annuitant-specific information.

To establish guidelines for TRS employees' personal use of social media during working hours and as it relates to TRS.

## References

- Tex. Gov't Code Ann. § 825.215, Advocacy Prohibited
- Tex. Ins. Code Ann. § 1579.005, Confidentiality
- Tex. Ins. Code Ann. § 1575.456, Confidentiality of Records
- Tex. Gov't Code Ann. § 552.002, Definition of Public Information
- Tex. Gov't Code Ann. § 552.143, Confidentiality of Investment Information
- Tex. Gov't Code Ann. § 825.513, Information for Publication
- Tex. Gov't Code Ann. § 825.315, Prohibited Use of Assets
- Tex. Gov't Code Ann. § 821.008, Purpose of Retirement System
- Tex. Gov't Code Ann. § 825.507, Record Confidentiality
- 1 Tex. Admin. Code § 206.53, State Website Linking Policy

## Applies To

All TRS employees and authorized administrators of TRS social media Presence. **NOTE:** *Non-TRS workers assigned to TRS are expected to adhere to the standards of conduct outlined in this policy while on TRS premises or otherwise conducting TRS business. Non-TRS workers include contract workers, unpaid interns and volunteers.*

## Definitions

**Authorized Administrators:** TRS employees authorized by the communications director or designee to speak for TRS in an official capacity using social media tools and to manage and maintain TRS' social media presence, according to the employees' official duties.

**Blogs:** Short for Weblog, a type of website that is updated frequently and written in a conversational tone.

**Comments:** Remarks on social media sites that are in reply to postings or other comments.

**Facebook:** A social networking site that allows users to create profiles, add friends, “like” or comment on posts, and upload photos and other content.

**Instagram:** A social networking service that allows users to share photos and videos.

**LinkedIn:** A professional networking site. LinkedIn also allows companies to create profiles, advertise jobs and post updates.

**Podcasts:** Digital audio or video files made available for download or streaming from the internet.

**Postings:** Content placed on TRS’ social media sites by authorized administrators.

**Social Media:** The term used to describe an array of web-based and mobile tools that allow users to interact with others by sharing information, conversations, photos, videos, and other content. Because of the dynamic nature of the internet and social media, it is impossible to maintain a list of the latest popular social media applications. In addition to the sites specifically named in this policy, social media includes sites such as Snapchat, Tumblr, Vimeo, and other similar platforms and applications that exist or may be developed.

**TRS’ Social Media Presence:** TRS’ identifiable participation in social media tools such as Facebook, Twitter, LinkedIn, Instagram, and YouTube.

**Twitter:** A microblog that allows “tweets” of 280 characters or fewer.

**Wikipedia:** A collaboratively edited, multilingual, online encyclopedia.

**YouTube:** A website that lets users upload videos for private or public viewing.

## TRS Social Media Presence

TRS’ social media presence includes, but is not limited to, Facebook, Twitter, Wikipedia, LinkedIn, Instagram, YouTube, blogs, and podcasts. These tools are intended to enhance traditional communications taking into account TRS’ mission and goals, communications capabilities, audiences, technical capabilities and potential benefits.

Members, retirees and the public may participate in TRS’ social media presence to gain TRS information through electronic media and online dialogue. TRS does not provide individual benefit advice through its social media presence. TRS does not guarantee the applicability or accuracy of any social media information with regard to an individual participant’s circumstances.

The communications director or designee shall have primary responsibility for establishing and maintaining TRS’ official presence. No other department or employee is authorized to create, use or post on a social media site for the purpose of representing TRS without the written permission of the communications director. TRS’ social media accounts must be set up by the communications department in TRS’ name. To the extent an employee’s name is required; it must be the

communications director unless otherwise approved by the communications director. All authorized administrators will store login information for TRS' social media presence (including login name, registered email, and password) in accordance with the communication director's instructions.

The communications director or designee is responsible for developing and maintaining TRS social media presence goals, strategies, guidelines and procedures complying with all laws and TRS policies, and providing accurate, timely and relevant content. The communications director will designate authorized administrators, provide for their training and monitor their social media activities. Authorized administrators are the only TRS employees authorized to post official content on behalf of TRS. Authorized administrators who post significant information shall ensure that TRS' social media presence is not the sole method by which that information is disseminated.

## **Permissible and Non-permissible Comments on TRS-Owned Social Media**

TRS' social media content shall be monitored regularly as set forth in TRS' Social Media Administrator Guidelines. This policy and the guidelines shall specify permissible and non-permissible content as determined by the communications director or designee with guidance from other departments. Permissible information may include news releases, board meeting announcements and notice of available publications. Non-permissible content will be deleted and includes, but is not limited to, comments, hyperlinks and URLs that:

- are off-subject or out of context;
- are threatening, harassing, defamatory or discriminatory;
- contain obscenity;
- contain confidential or sensitive TRS information or confidential member information;
- contain protected health information (PHI);
- contain information that could reasonably be construed to compromise public safety;
- incite or promote violence or illegal activities;
- advertise or promote a commercial product, service, entity or individual;
- contain copyright infringing material;
- promote, endorse, oppose, or disparage political campaigns, candidates or officeholders;
- are a violation of TRS' workplace policies against discrimination, bullying, harassment, retaliation, or hostility on account of age, race, religion, sex, ethnicity, nationality, disability, or other protected class, status, or characteristic; or
- are otherwise illegal or violate TRS policy.

In addition, participants will be prohibited from posting photos on TRS' social media channels unless TRS is conducting a photo contest or decides to otherwise allow posting of photos. In these cases, administrators will monitor photos and remove anything inappropriate.

## Linking to Third-Party Websites

TRS' social media channels shall on occasion contain links to website such as our health care vendor websites. The intent of the links is to provide useful information and does not imply endorsement. TRS is not liable nor responsible for third-party website content.

TRS will provide in its public social media participant guidelines a statement regarding our linking policy and will include a statement disclaiming liability and responsibility for third-party website content. TRS will also add this disclaimer to social media posts containing links: Disclaimer: When clicking on this link you will leave the TRS social media page and will be redirected to another site.

## Intellectual Property Rights and Ownership

TRS shall comply with the rules regarding copying and use of information by website owners linking to state agency sites ([1 TAC 206.53](#)) as it pertains to protected intellectual property.

Authorized administrators may post photographs, audio or video to TRS' social media presence. TRS must have the right to post the content. Intellectual property rights of content provided by the public will be governed by TRS' Terms of Service and Use Policy (For Copyright Protections) or the terms of services of the third-party social media provider. The policy will be included in TRS' Social Media Participant and Administrator Guidelines.

TRS respects the rights of all copyright holders, and has adopted, and implemented a policy that provides for the termination in appropriate circumstances of users and account holders, including employees and authorized administrators, who repeatedly infringe the rights of copyright holders or violate this policy.

## Employee Use of TRS' Social Media Presence

TRS employee participation in TRS' social media program is voluntary. Employees may comment on TRS' social media presence so long as the employee complies with all state and federal laws and TRS' policies. Only authorized administrators "speak" for TRS through TRS' social media presence and are the only TRS employees authorized to post official content on behalf of TRS.

When participating:

- TRS expects employees to use professional judgment and exercise caution regarding any external communications, including the use of TRS' social networking sites. (See TRS Staff External Communications Policy.)
- Employees may post only permissible content on TRS-owned social media presence, and must maintain confidentiality of member records and certain investment information.
- TRS employees do not have to identify themselves as employees when commenting on TRS' social media presence; however, if employees do identify themselves as TRS employees, they must also state that any opinion given is their own and does not, necessarily, represent the opinion of TRS.
- Employees, whether they identify themselves or not, are responsible for the content of all their posts on TRS' social media.

- Because of their high visibility, TRS employees who are executive council (EC) members are discouraged from commenting on TRS-related postings as EC members may be perceived as speaking for the agency. EC members wishing to comment must first gain the approval of the executive director. Should the request and comment be approved, EC members must identify themselves as TRS employees and must state that any opinion given is their own and does not, necessarily, represent the opinion of TRS.
- Employees are prohibited from lobbying and engaging in political activity during work hours or when using state (and TRS Trust) resources. (See TRS' Employee Ethics Policy.)

## Employees' Personal Use of Social Media

Employees' personal social media accounts and websites should remain personal in nature and should not be used for TRS-related purposes. Employees' use of TRS information resources for the incidental personal use of social media sites is permitted as authorized under the TRS Information Security Manual (ISM), Section 3.0, and consistent with TRS' Fraud Waste and Abuse Policy and Employee Ethics Policy. Incidental personal use of social media sites must not interfere with performance of work duties. Employees may be subject to Corrective Action if personal use of social media becomes disruptive to work duties. **There is no expectation of privacy for personal social media accounts accessed on TRS information resources or Wi-Fi.**

In their personal social media activity, employees are expected to:

- Not use their TRS email account to register or set up personal social media accounts or websites;
- Not represent that they are speaking for TRS in an official capacity, attribute their personal communications to TRS, or create the impression that their personal communications have been endorsed by TRS;
- Maintain the confidentiality of information protected by law, including PHI or other identifiable participant or case-related information, Material Non-Public Information, and other protected confidential information defined in the TRS Confidentiality Policy and TRS Trading Policy;
- Comply with the TRS policy Prohibiting Workplace Harassment and Discrimination. Inappropriate discriminatory remarks, harassment, retaliation, threats of violence, or similar inappropriate or unlawful comments directed at TRS co-workers will not be tolerated. Prohibited harassment includes offensive 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 TRS policy.

## Public Information and Records Retention

TRS' social media presence may contain communications subject to the Public Information Act and Policy, state records retention requirements and the TRS records retention schedule. The Communications Department shall be responsible for ensuring that social media is retained in the proper TRS record series.

## Open Records Requests

TRS' social media presence is not an appropriate method for submitting an open records request. Authorized administrators may direct participants to designated methods for filing open records requests as set forth in TRS policy.

## Security

All TRS employees and non-TRS workers must comply with all applicable policies, standards, and guidelines contained in the TRS Information Security Manual.

## Accessibility

The Communications Department shall use reasonable efforts to ensure that persons with disabilities have access to TRS' social media presence. For example, TRS provides closed captioning of all videos. We also provide transcripts of videos on the TRS.TV section of the TRS website. When the communications department identifies accessibility tools offered by social media providers or others, authorized administrators will provide notice of alternate versions in the Social Media Participant Guidelines on the TRS website.

## Corrective Action

Violation of this policy may be grounds for corrective action, including termination of employment without warning.

## Related TRS Policies

- Confidentiality Policy
- Confidential Information Procedures and Standards
- Corrective Actions
- Employee Ethics Policy
- Fraud, Waste, and Abuse
- Information Security Manual
- Information Security Policy
- Performance Management
- Prohibiting Workplace Harassment and Discrimination
- Public Information Act and Policy
- Records Management Program
- Staff External Communications Policy
- TRS Trading Policies

## Awareness Training

TRS employees and non-TRS workers subject to this policy must acknowledge their understanding of the policy and their roles and responsibilities related to TRS and social media upon employment with TRS. In addition, TRS will provide either classroom or online training sessions at least once every two years to coincide with the policy review cycle. Employees will need to certify their understanding of the policy after completing the training.

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*This policy does not constitute a contract nor a guarantee of employment and may be modified, superseded, or eliminated by TRS without notice to the employee. This policy supersedes all previous policies on this subject.*