



Fairfax County Internal Audit Office

Office of Public Affairs
Social Media Use Audit
Final Report

April 2019

"promoting efficient & effective local government"

Introduction

The Internal Audit Office (IAO) performed an audit of the County's Social Media Use which is managed by the Office of Public Affairs (OPA). The Fairfax County's social media presence consists of 55 pages across multiple platforms: Facebook, Twitter, Instagram, YouTube, and Nextdoor. While OPA oversees the social media program as a whole, each page is maintained by the department's publishers who are responsible for the day-to-day content posted. The review and approval process for opening a social media account is performed by the Social Media Review Panel within OPA. The Office of Public Affairs also provides social media use trainings to the departments' publishers.

Executive Summary

The audit was performed to determine if appropriate controls were implemented to properly oversee the County's social media program. In general, the controls over the social media process were adequate. The policies and procedures surrounding the social media process were extensive and covered a wide variety of topics. The departmental social media page requests for accounts were reviewed and approved by OPA prior to the creation of the page and releasing to the public. In addition, through the use of management software such as Facebook Business Manager and Hootsuite, OPA had the ability to secure and manage the Facebook and Twitters accounts. The social media deleted contents were documented and on file with OPA. However, IAO noted some exceptions and process improvements which would assist OPA in their effective management of the social media program:

- The social media policy did not require departments to notify OPA of changes to the departments' social media publishers' employment status.
- OPA did not have a process in place to detect County-related fake social media accounts.
- An access request form was not being utilized by OPA for departments to complete to grant social media publishers' access to the social media page.
- Not all social media publishers had completed the most recent social media training. In addition, the current social media trainings did not include a section on guidelines for the appropriate content posted to the social media page.

Scope and Objectives

This audit was performed as part of our fiscal year 2019 Annual Audit Plan and was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The objectives of the audit were to determine if:

- Policy and strategy for appropriate presence and information posted on accounts was established.
- Procedures for the creation of social media accounts and assignment of publishers were adequate.
- Security to prevent or detect unauthorized access, modification and/or deletion of accounts established was adequate.
- Procedures for monitoring and archiving account postings and comments complied with all legal and policy requirements.
- Administrative controls over the County's use of social media minimized security and privacy risk and potential legal actions against the County.

Methodology

Our audit methodology included a review of the policies and procedures related to the social media program including the Fairfax County Social Media Policy & Guidelines for Official Account; Photo Guidelines; Video Guidelines, Endorsement or Recommendation of Products and Services by County Officials or Employees Policy; Web Content Policy; Emergency Operations Plan; Information Technology Security Policy; Records Management Policy; Freedom of Information Act Policy; and Process for Deleting Comments. We also interviewed staff to gain an understanding of the program; review of account and publisher applications; examination of existing social media pages; and review of training materials. We also reviewed the social media page creation's review and approval process. Existing accounts were examined to determine that their settings conformed to County standards and still actively used by the departments.

Findings, Recommendations, and Management Response

1. Terminated/Transferred Publisher's Access

The current social media policy, *Fairfax County Social Media Policy & Guidelines for Official Accounts*, did not include procedures to require agencies to notify OPA when a social media publisher no longer worked for the agency or was in a position that did not need access to social media platforms to perform their job responsibilities. Per Procedural Memorandum 70-05, *Information Technology Security Policy*, "Data and system owners shall implement operational procedures and technical controls to ensure access to Fairfax County Government information and systems is based upon the principle of least privilege and an authorized need to know and access."

OPA should be notified by the respective departments once an employee who has publisher's access is no longer required to be part of the social media program. Also, current publishers' access to the social media platforms should be verified on a regular basis.

Failure to remove the publisher's access upon their termination/transfer in a timely manner could increase the risk of having the ability to post unauthorized information to social media pages representing the County which could result in damaging the County's reputation or endangering the citizens of the County. In addition, since publishers are able to access the County social media pages using their personal devices, it is imperative that OPA removes access in a timely manner once the individual is no longer requires it.

Recommendation: We recommend OPA revise the social media policy to require the agencies to notify them of changes in the publisher's status of employment. In addition, we recommend OPA reviews the list of the publishers on a regular basis and verify its accuracy. OPA should consider working with the Department of Human Resources (DHR) to receive a monthly report indicating terminated and transferred employees. This report should be compared to the list of active publishers. If a match is detected, OPA should update the publisher's status.

Management Response: OPA will update the social media policy to include language requiring departments to notify OPA of publisher status changes through the new publisher access form outlined in #3 below. In addition, OPA will regularly review existing access at least once a month and document this process. Finally, OPA will ask DHR to provide a regular report of employee changes to find any publisher matches. The anticipated completion date is September 1, 2019.

2. Fake Social Media Accounts

Through a keyword search in Google, we found four Instagram accounts that claimed to be the official Fairfax County accounts; however, they were not identified as the County' official Instagram accounts by OPA. These accounts were "countyfairfax", "irfaxcounty8825", "irfaxcounty9865", and "fairfaxcountypolicedept". None of the four accounts had posted contents or followers except for "Countyfairfax" which had two followers but no posts.

Fake social media accounts could increase the risks of false, misleading, or inappropriate content posted and shared with public pretending to represent Fairfax County which could result in the publics' frustration, confusion, and distrust. It also could pose a threat to the County citizens in the form of soliciting personal information and other scams.

Recommendation: We recommend OPA develop written procedures to conduct a key word search of all social media platforms to detect possible imposter accounts on a routine basis. Once an account is detected, OPA should contact the platform to start the process of removing the imposter account before it can post misleading information.

Management Response: OPA will begin to more robustly monitor, document and take action against possible imposter accounts by 1.) keeping a list of known accounts across all platforms 2.) reporting fake accounts, in consultation with the county attorney, to social media platforms 3.) asking key departments such as public safety

to help monitor and report potential fake accounts to OPA 4.) providing new resources and training about fake accounts, disinformation and rumors and 5.) writing a new section on fake social media accounts into the updated social media policy. The anticipated completion date is September 1, 2019.

3. Social Media Access Request Form

There were no formal written procedures for requesting and granting access to social media publishers; nor was a standardized user access request form used for documenting access approval. Currently, the departments contact OPA via email to request access for their new publisher. PM 70-05, *Information Technology Security Policy*, states that “Requests for user, administrative, and system access must be approved according to formal access request procedures.” Formalized access request procedures should be in place to require the requestor to submit necessary information and approvals to OPA when requesting access to the social media accounts.

Inadequate controls over publisher’s access could increase the risk of granting unauthorized access to County social media accounts to publish improper, inaccurate, and unauthorized contents.

Recommendation: We recommend OPA develop formal procedures for granting access to social media platforms and require agencies to complete a formal access request form for publisher’s access to social media pages. This form should include but not be limited to the name of publisher, completed required training, reason for access, and the approval of the agency’s director/designee for granting access to social media accounts. The form should be on file in OPA.

Management Response: OPA will begin requiring the use of a new social media publisher access form and write this form into policy. The anticipated completion date is September 1, 2019.

Note: *During the audit, OPA has developed a Social Media Publisher Access Form which will be used by departments to request new publisher access for staff members. No follow-up is needed for this item; however, IAO will follow up on the status of the recommendation to develop formal procedures for granting access to social media platforms.*

4. Social Media Required Trainings

Of the 25 publishers’ social media training documentation reviewed, nine did not properly complete the social media required trainings. Of that number, five individuals received no training prior to gaining access to a social media page; one was granted access due to an emergency situation prior to granting access; and, three attended the outdated in-person training. Additionally, while the current required social media trainings covered the technical aspects of creating and posting content to social media platforms, it did not adequately educate the publishers on the appropriateness of the comments they post to make sure they are not offensive or unacceptable.

Per *Fairfax County Social Media Policy & Guidelines for Official Accounts*, “Only county staff will serve as publishers; publishers will attend mandatory training sessions.” Prior to OPA granting the publisher access to the social media page, they must complete the required trainings associated with the platform (Facebook, Twitter, Instagram, and YouTube).

Additionally, the required trainings should cover the appropriateness of the content posted to the social media page. The publishers should have the ability to identify and prevent the posting of comments which may be offensive or insensitive to the public.

Lack of proper social media training could lead to publishers creating offensive, inappropriate, and misleading content. If offensive content is shared through a County controlled social media page, it would negatively impact the County’s reputation and could contribute to a potential lawsuit.

Recommendation: OPA should require all individuals who have not completed the most recent social media training to take the training immediately. In addition, we recommend OPA update the training to better guide the publishers to minimize the risk of comments posted onto the social media pages that are not appropriate or offensive.

Management Response: OPA will update all social media-related trainings in EmployeeU and create new ones to ensure proper education for all publishers, including what not to publish. Required courses will include deleting comments and banning users, a new training for all Facebook, Twitter and Instagram publishers. OPA will also continue to provide interim and new training guidance on the Fairfaxnet Social Media Resource Center. Finally, OPA will update the social media policy requiring all publishers to take training or access will be removed after several reminders. The anticipated completion date is September 1, 2019.