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Facebook and Social Network Security Recommendations

Always superseded by host agency policy

Social networking sites such as Facebook can be a useful tool in case management, especially in tracing and communicating with clients. Because no cellular connection or related expense is required, many clients use social networking, including apps such as Facebook Messenger, as a primary means of communication. However, there are inherent risks to privacy that should be considered:

- Facebook frequently changes its privacy settings; remember that the goal behind social networking is not to protect privacy.
- A Facebook "Friend", the profile picture and name, is itself personally identifiable information.
- Facebook records can be subpoenaed, leaving staff and clients open to scrutiny and legal liability.
- Facebook is able to create a page from public information for your agency even if you don't, so management of that information is wise.

Factors specifically pertaining to the PCAP model should be considered:

- It is important to maintain boundaries between our personal and professional lives
- The relationship between case managers/advocates and clients is not a friend relationship; the language of Facebook (i.e., "Friends") can confuse this.
- Facebook communication is not a substitute for true relationship-building, and does not replace home visitation, face-to-face visits, or phone calls.
- We need to protect the privacy of our clients, and our clients' data/information.

Recommendations for Facebook/Social Network Security, based on the PCAP model:

- Use a work-based Facebook account, not your own personal Facebook page to interact with clients. Note that if you browse a client's pages while logged in to your own personal page, it can result in Facebook sending the client a suggested friend request from your personal account, compromising your own privacy.
- For the same reasons, never access your personal Facebook account from your work phone.
- Include ‘PCAP’ in the name of the work-based Facebook account, e.g., "Seattle PCAP."
- Do not "Friend" clients, even from a work-based Facebook account, in order to see their pages.
- Do not "Like" or "Comment" on the client's page. Use the more private Facebook Messenger to make comments.
- Note that Facebook Messenger is not secure. Do not discuss sensitive information in a chat or via a Messenger text. Keep communications brief and limit messages to things like:

  "I haven't heard from you in a while. Please call me at my office (#____) or on my cell (#____) or email me at (email address)." -or-

  “Can you meet me at (place) at (time)? Please call me at (#___)."

Based on discussions with PCAP staff at the 2015 Evaluation Site Visits, the following recommendations were derived regarding how to set up and manage PCAP Facebook accounts:

- Use one PCAP site account, rather than individual case manager accounts. This eliminates the need for the supervisor to monitor multiple individual accounts, minimizes privacy risks, and reduces the time case managers/advocates spend working on the account itself.
    - All PCAP staff at the site use the same account name and password to log on.
    - All Facebook Messenger communication goes through the single Messenger account.
    - Have at least two administrators: 1) the PCAP supervisor and 2) at least one other staff member, with both work email addresses associated with it.
    - Allow posting on page only by PCAP administrators, not clients or other users. Turn "Visitor Posts" feature off; these posts would lead back to the poster's page creating privacy risks.
    - Turn "Friends Request" feature off. Have clients and service providers connect with the PCAP account by "liking" the page, not by becoming "Friends".
    - If posting is controlled and no personally identifiable information is ever posted, the page's privacy can be set to "Public"; this will allow disengaged clients searching for PCAP to easily find it and send a message.
    - Site Pages can be used to disseminate information about the PCAP site and invite people to PCAP-hosted events (i.e., can serve the function of a newsletter; never include personally identifiable information about clients).
    - Do not post pictures of clients, clients' family, or staff.
    - If appropriate, the PCAP site address and phone number can be visible on the wall.

- Individual PCAP Facebook accounts are permissible, but *only* with supervisor and host agency permission. If individual accounts are used, remain vigilant in protecting clients' privacy.
    - Review privacy settings at least monthly, including using the "View as…" feature to see how your account appears to the public, and to individuals associated with the account. Facebook is known for changing security options with no notice. Check regularly.
    - The account should be set up as a “Private” or “Secret” (Custom) account, not "Public".
    - Having clients be "Friends" with any PCAP account is not recommended. However, if you do so, settings must be set so that "Friends" (clients) cannot see each other (hidden). Note: even this is risky, as Facebook is known for changing security options with no notice. Check regularly.
    - Disable clients' ability to post to your account. Restrict communication to Facebook Messenger.
    - Never post personal pictures of yourself or your family.
    - Do not spend time embellishing the account, adding likes, writing a personal newsletter, etc.
    - The individual account should have at least two administrators: 1) the PCAP supervisor and or office assistant; and 2) the staff member, with all of their work email addresses associated with it.
    - The case manager's username and password should be on file with the supervisor and updated with any changes.
    - Supervisors should monitor individual case manager PCAP accounts for adherence to policy and close the account when the staff member leaves employment.