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To: Board of Commissioners  
From: Briggs Tople, Outreach & Communications Specialist  
Re: Social Media Policy

### History

In 2021, the personnel policy was amended to include a new social media policy. This policy was meant to address how our new social media accounts be managed and how County employees should navigate the social media landscape.

In 2023, the social media policy was once again revised to better clarify how social media administrators manage our social media accounts. Since implementation, however, the policy has encountered several challenges to its language and organization.

The Communications Committee in late 2023, with help from County Attorney Stephen O'Keefe, re-examined the policy and determined language changes were necessary. The policy attachment is the product of consultation with the Communications Committee and Management Team.

### Highlights

- New notice language to members of the public regarding the purpose of our social media accounts and how they are to be managed.
- Clarified language on which comments are to be and not be permitted on our social media account's posts.
- A new appeal process to reinstatement of post comments or access to social media accounts.
- Specification which dictates the interaction types social media administrators are to have with members of the public.
- Clarification on employee allowance to share content.

### Recommendation

Approve the new policy as written.

**Find your Good here.**

## **15.3 SOCIAL MEDIA**

### **Purpose**

Material circulation in Social Media has a vast base and it is paramount that our organization has a policy in place to legally protect us while guiding our interaction with the public. The purpose of this document is to establish practical, reasonable and enforceable guidelines by which our employees can conduct responsible, constructive Social Media engagement in both official and unofficial capacities.

### **Scope**

This policy applies to all Goodhue County employees, approved volunteers, consultants, service providers and contractors performing business on behalf of Goodhue County. This policy is not applicable to the County's elected officials.

### **Definitions**

Social Media Umbrella term to describe various forms of communication such as social networking sites, blogs, wikis, message boards, chat room, electronic newsletters, user rating services and any other online collaboration, sharing or publishing platform, whether accessed through web, mobile device, text messaging, email or any other existing or emerging communications platform.

County Officials County Administrator, Health & Human Services Director, and/or Sheriff

Social Media Administrators Person or committee in-charge of maintaining Social Media accounts on behalf of the county.

County Goodhue County Office

User Profile Account created by the county department to represent county.

~~Controversial Issues Issues that form the basis of charged debate that often provoke strong emotional response. Examples include political or religious views, healthcare reform, gun control, etc.~~

Message post/comment/image or any other form of Social Media message containing information, question or response sent/received by the public/county.

Personal Interaction Use of Social Media by the employees of the Goodhue County for personal purpose that is NOT on behalf of the Goodhue County.

### **Policy**

Sites that allow public comment shall **provide a Notice that** informs visitors of the intended purpose of the site and provide a clear statement of the discussion topic introduced for public comment. **The Notice should contain a statement substantially as follows: It is important that the public is aware of the limited nature of the discussion and that inappropriate posts are subject to removal, including but not limited to the following types of postings regardless of format (text, video, images, links, documents, etc.):**

**“The purpose of this page is to present matters of public interest concerning programs, activities, news, stories, and photos. Your comments are welcomed, but please note that this is a moderated online discussion page and not a public forum. Goodhue County reserves the**

right to remove comments in accordance with this Notice and the Goodhue County Social Media Policy.”

County social media administrators will not edit any posted comments. However, comments posted by members of the public may be removed if they fall into at least one of the following categories:

- Comments unrelated to the purpose and topical scope of the page (when indicated by the administrator of the particular site)
- Obscene or pornographic content
- Direct threats to persons or property
- Incitement to imminent lawless action
- Information which may interfere or compromise emergency management, current investigations, police tactics, and the safety of law enforcement staff, peace officers and/or emergency responders.
- Material asserted to violate the intellectual property of another person
- Private, personal information about a person published without their consent
- Information that compromises a public safety security system
- Statutorily private, confidential, or nonpublic data
- Commercial promotions or spam
- Hyperlinks to material that falls into one of the foregoing categories
- ~~• Comments not topically related to the particular Social Media article being commented upon;~~
- ~~• Comments in support of or opposition to political campaigns or ballot measures;~~
- ~~• Profane language or content;~~
- ~~• Rude, disparaging or discourteous comments directed at specific individuals, groups, or organizations~~
- ~~• Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation;~~
- ~~• Sexual content or links to sexual content;~~
- ~~• Solicitations of commerce and posting ads~~
- ~~• Illegal conduct or encouragement of illegal activity~~
- ~~• Information that may tend to compromise the safety or security of the public or public systems~~
- ~~• Content that violates a legal ownership interest of any other party;~~
- ~~• Comments or content that harass or advocate harassment of another person;~~
- ~~• Comments or content that poses or creates a privacy or security risk to another person~~
- ~~• Comments or content soliciting or designed to solicit passwords or personal identifying information~~
- ~~• Comments or content that includes a photograph or video of another person posted without the person’s permission and consent.~~

Social media administrators who wish to limit comments to the purpose or topical scope of their page or site must specifically state so in the Notice to users.

County social media administrators shall not moderate content based solely on the viewpoint expressed. Comments should only be removed if they fall within one of the listed categories. Administrators shall notify members of the public anytime their comment has been removed, comment reinstated, account blocked, or account reinstated pursuant to this policy and the Notice provided to users.

A member of the public whose comment is removed may appeal the removal of the comment and seek reconsideration by contacting the County in writing and explaining how the comment does not fall into one of the categories for removal. A written response should be provided as soon as reasonably possible. All appeals will be reviewed and ruled upon by the County Official who oversees administration of the respective social media account.

Repeated posts in violation of this policy may result in the administrator blocking user from the site for period of up to one year depending on the nature and extent of the violations. Administrators shall notify members of the public anytime they are being blocked from the website and the reasons thereof. A member of the public who has been banned from an account may appeal that decision using the appeal process noted above. All appeals will be reviewed and ruled upon by the County Official who oversees administration of the respective social media account.

A member of the public who disputes the legality of any portion of this policy may dispute the particular portion in writing. The County should acknowledge the claim promptly and, upon consultation of the County Attorney, respond to the claim concerning legality of the policy portion as soon as reasonably possible under the circumstances.

This section of the policy must be displayed to members of the public utilizing County social media platforms through notice available via hyperlink. Any content removed based on these guidelines must be retained subject to applicable retention periods, including the time, date and identity of the person who posted when available.

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### **Social Media Management Policy**

This section is to aid the County in following policies designed to help in the management of Social Media profiles. Certain requirements need to be met in order to create, run and maintain a user profile.

#### Management Responsibilities:

- Department use of Social Media technology shall conform to this policy as well as all other applicable county policies, protocols, and procedures.
- A Department Director's decision to utilize Social Media shall consider the department's mission and goals, audience, technical capabilities, potential benefits, and potential costs or risks. Department Directors are responsible for determining who is authorized to

use Social Media on behalf of the department, and for designating appropriate access levels

- Each department may create a procedure manual for employees to follow that adheres to this Social Media policy.

#### Account Creation:

- For any official Social Media profile created, the County Administrator's Office and the IT Department must have access as an Administrator of the page.
- All Social Media accounts must be authorized by the County Administrator's Office and the IT Department prior to being created. Social Media network access shall be limited only to those with a clear business purpose to use the forum.
- County Social Media network accounts shall be created using an official County email account.
- A Department may request approval of additional Social Media networks as needed using the appropriate form(s).

#### Authorized Use:

- A Social Media Administrator must be designated, who shall assume the responsibility to oversee the department's Social Media activity and policy compliance.
- Authorized users shall be provided a copy of the County's Social Media policy and are required to acknowledge their understanding and acceptance via signature.
- Account password information shall only be shared with authorized staff that has been designated by the Department to fulfill the role of the Social Media account Administrator.

#### Content Management:

- Official county pages/profiles or forums may not be used by any employee or representative for personal financial gains, private or personal purposes or for expressing their personal views on any issues.
- All County Social Media page postings and updates must be approved by Social Media Administrator.
- The County and its designated officials may monitor content on each of the Social Media sites to ensure adherence to the Social Media Policy for appropriate use, message and branding consistent with the goals of Goodhue County.
- Sites shall contain visible elements that identify them as an official Goodhue County page. Among other items, this includes displaying official Goodhue County seals, department brands, contact information and a link to department websites.
- Information shared through Social Media channels shall fully comply with Department policies and procedures and shall not disclose confidential or proprietary information.
- Departments shall maintain a record of Social Media sites created that includes, but is not limited to:
  - a log file containing the name of the Social Media network, account id, password, registered email address, date established, authorized representative(s) and the name of the person who created the account.

#### Interaction with Public

- Department Social Media Administrators shall review site activity and content regularly for violation of public policies listed in Section 1 of this policy.
- Upon receiving any form of message from the public, which includes posting, comments, images, and any other forms of Social Media communication with the intent to interact with the county, the following possible actions could be taken:
  - Reply: If the message is compliant with the public policy and seeking information, only the authorized staff is allowed to reply with correct information. The provided answer must be thoroughly verified for accuracy, spelling and grammar.
  - Delete/Hide: If the message is NOT compliant with the public policy, the post/comment/image or any other form of Social Media message must be deleted. If the message seeks for information, the authorized staff may still reply with an answer and a response as to why their message was deleted.
    - Social media administrator must notify the member of the public their post/comment/image was deleted and the policy violation with the following text:
      - “Hello, your comment on the post regarding [INSERT POST CONTENT] has been removed for violating our social media policy where comments containing [INSERT POLICY LANGUAGE] are prohibited. If you would like to appeal or learn more about our policy, please visit [INSERT WEB LINK].”
  - Block: If a public user repeatedly violates the public policy listed in Section 1 of this policy, following three documented occurrences, they may be blocked by the authorized staff.
    - Social media administrator must notify the member of the public of their access being blocked.
      - “Hello, your access to [INSERT SOCIAL MEDIA ACCOUNT] has been blocked following the removal of three separate comments with prohibited material according to our social media policy. At this time, your account will be banned from accessing this social media page’s content for six months. However, if you would like to appeal this blocking, please visit [INSERT WEB LINK] with instructions on how to do so.”
- All interactions with public related to removal of posts or blocking access to sites must be logged and retained by the Social Media Administrator, subject to applicable retention periods.

**Social Media Archiving:**

- Social Media activities, such as responding to a comment, deleting a comment, or blocking an account, are not automatically logged or archived. It is the responsibility of the Social Media Administrator to ensure these types of activities are logged in the event of a complaint or legal action by a member of the public.

**Policy for Personal Interaction with Social Media**

This should help the employees of Goodhue County be informed on how to interact with Social Media with their personal profiles. Failure to comply with these Social Media policies may result

in disciplinary action, up to and including termination. Failure to comply may also result in civil or criminal penalties as provided by law. All employees must abide by the following guidelines:

Guidelines for posting content:

- Refrain from using Social Media sites in a manner that may damage or reflect discredit to the County's good reputation by posting content created, owned, associated with or held as a custodian by the County, including but not limited to intellectual property, trademarks, logos, copyrighted material, or images depicting County uniforms, vehicles, facilities, or other items identified with the County or its business partners.
- Do not engage in prohibited Social Media conduct including posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.
- Do not engage in harassment, threats, intimidation, ethnic slurs, personal insults, obscenity, racial or religious intolerance and any other form of behavior prohibited in the workplace is also prohibited via Social Media channels.
- Do not publish, post or release any information that is considered confidential or not public. If there are questions about what is considered private or confidential, check with the [Data Practices Officer](#) and/or supervisor.
- Do not publish, post or advocate any information that promotes illegal behavior.

Usage of Social Media during work:

- Accessing Social Media for personal purposes during work hours is not permitted, except under the following circumstances:
  - When brief personal communications may be warranted by extenuating circumstances (e.g., inform family of extended hours).
  - During authorized breaks; such usage should be limited as much as practicable to areas out of sight and sound of the public and shall not be disruptive to the work environment.
- Employee use of Social Media during work hours may be monitored and recorded.
- Employees should have no expectation of privacy while using County email, computer systems, networks, mobile devices, cell phones, or any other County owned communications device to access any type of Social Media. This includes the use of personally owned communication devices if the employee is the recipient of any cellular reimbursement.

Sharing Content [Obtained Through Employment and Not in the Public Domain](#):

- An employee must get appropriate permission before referring to or posting images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use third party copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- An employee must get appropriate permission before posting or releasing any kind of information that specifically identifies the County without express authorization from the specific department.
- Employees are prohibited from sharing anything via Social Media channels that could violate another employee's right to personal privacy. Examples of Social Media disclosures that may compromise an employee's right to privacy include, but are not limited to: pictures, video, audio, or personally identifiable information.

- Employees must take reasonable and prompt action to remove any content, including content posted by others, that is in violation of this policy from any Social Media profiles/webpages maintained by the employee.
- If an employee has access to information of any not public data, photograph, video, recording or any other form of data obtained or accessible as a result of their employment with Goodhue County, they are not allowed to use or disclose that information without express authorization from designated authority in charge of handling that data.

Identity disclosure:

- If an employee who is NOT authorized to speak on behalf of the County has valuable information that could benefit those affected by a crisis, disaster or emergency, they may share that information via Social Media channels, so long as they include a disclaimer and do so in accordance with the guidelines of this policy.
- If you engage in Social Media channels about Goodhue County while NOT on behalf of Goodhue County, you must disclose your identity and affiliation with Goodhue County.
  - When engaging in Social Media about Goodhue County and NOT in an official capacity as a county employee, you must add a disclaimer such as:
    - “I work for Goodhue County and this is my personal opinion.”
    - “I am not an official spokesperson for the County; my personal opinion is...”
    - “The postings on this site are my own and don't necessarily represent Goodhue County's positions, strategies or opinions.”