


Function: Corporate Services - 03
Department: Information Tech.- 070
Policy No.: 001



Social Media Policy

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Cancel: Policy 277 – Social Media Policy
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CAO Signature: 

Purpose: The official presence Lac Ste. Anne County (“LSAC,” the “County”) on some social media sites contributes in an official capacity to discussions on County programs and services.

This policy refers to freely accessible online (social media or web 2.0) tools used to produce, post and interact using text, images, video, and audio to communicate, share, collaborate, or network. This includes blogs; social networks; video/photo file sharing; podcasting; wikis; and similar tools. For the purposes of this policy, social media refers to the public-facing County Web presence and third-party-hosted social media sites.

This Social Media Policy outlines for employees the corporate standards and principles of communicating in the online world when it relates to discussing, sharing or commenting on County business. Additionally, it serves to:

1. Protect the County’s reputation and ensure consistency and professionalism in how Council and Administration communicate about County business with our public stakeholders via all online forums and social media/networking sites.
2. Provide employees with an understanding of the policies and procedures surrounding the acceptable corporate and personal use of social media sites and/or personal websites as they relate to discussing the business of the County.

3. Establish protocols, criteria and courses of action for:
 - Establishing and monitoring of acceptable social media tools for use by the organization and its departments.
 - Determining/adopting new social media tools/accounts for corporate use.
 - Appropriate monitoring and administration of corporate social media tools.
 - Providing timely, effective, and accurate information and responses.
 - Ensuring a mechanism to address controversial or sensitive matters relating to online content about the County, its business, or its employees.
 - Ensuring appropriate records management and retention efforts as it relates to online forums and tools.
 - Ensuring appropriate protection of privacy of the public who engage or interact with the County via social media/networking tools.

DEFINITIONS:

1. "**Administration**" means an employee with The County.
2. "**Canadian Copyright Act**" means Canada's federal statute governing copyright law in Canada.
3. "**Council**" refers to the Mayor and Council for The County.
4. "**County Manager**" means the Chief Administrative Officer, or their designate, appointed by County Council.
5. "**Freedom of Information and Protection of Privacy Act**" means the Alberta regulation that provides for the right to access records of a public body and the protection of personal information about individuals that is held by public bodies.
6. "**County**" refers to Lac Ste. Anne County.
7. "**Media**" refers to any organization or group that is involved in informing the public with news and commentary through mediums including but not limited to newsprint, radio, television, and Internet.
8. "**Media Representatives**" means any individual working on behalf of the media.
9. "**Municipal Government Act**" means an act of the legislature of the Province of Alberta, which authorizes and creates the governance of urban and rural municipalities throughout Alberta.

10. **“Online Communications”** refers to the communication of information through the use of the internet for any purpose (i.e. information sharing, marketing, engagement).
11. **“Mayor”** refers to the Chief Elected Official of the County.
12. **“Spokesperson”** refers to a person authorized by the County Manager make statements to the media on behalf of The County.
13. **“Strategic Communications Plan”** refers to a document that is developed in collaboration between departments and the County’s Communications resources to effectively use communications as a resource in communications initiatives, issues management, project management, and day-to-day business operations.
14. **“Social Media Content Moderators”** are employees within Lac Ste. Anne County who have been appointed by the County Manager to speak on behalf of the County through updating the content of the County’s social media sites and pages.
15. **“Communications Team”** a team made up of the County Manager, Communications Consultants, Communication Coordinator, and anyone else appointed to the group by the County Manager.
16. **“Communication Coordinator”** appointed by the County Manager as the head of the Communications Team.
17. **“Traditional Communications”** refers to the sharing of information for any purpose via commonly used or traditional tools such as media relations (releases, advisories), print (brochures, posters, paper advertisements), or radio.
18. **“Online Communications”** refers to the communications of information through the use of the internet for any purpose (i.e. information sharing, marketing, engagement).
19. **“A Public Statement”** is a declaration made by County employees in any public forum, which relates to the County, its employees and/or its business and enterprise units and includes statements made in blogs, online forums or discussions, social networking sites, wikis, and elsewhere in the public record.
20. **“Intellectual Property”** describes ownership of an intellectual 'product' which may have commercial value. It encompasses areas including: copyright, trademarks, patents, and design.
21. **“An Official Record”** is anything which is created in the regular course of conducting County business and which documents the business of the County, regardless of format. Official records document decisions, policies, procedures, transactions, activities, commitments, obligations, ownership, entitlement, legal rights, etc. of the County and are relied upon by the County for proof of such or to support County business.

22. **“Transitory Record”** is a record of the County, regardless of format, that is a copy of an official record or is used for the purpose of creating official records. These records are temporary in nature and are not the final copy upon which the County would rely for proof of any activity, decision or policy unless an official record did not exist.
23. **“Personal Information”** is information about an identifiable person recorded in any format including race; national or ethnic origin; colour; religion; age; marital status; education; medical, criminal or employment history; financial transactions; identifying number or symbol; address; fingerprints; blood type; personal email address; and name where it appears with other personal information; picture; etc.
24. **“Disclosable”** refers to information, including electronic information, which is eligible for access by the public in response to a request for information under the *Freedom of Information and Protection of Privacy Act*.
25. **“Discovery”** refers to a legal process in which the County could be compelled to disclose documents in connection with a court matter. The process is generally used by one party to obtain facts and information about the case from the other party in order to assist with preparation for trial.

POLICY STATEMENTS:

1. The establishment and use of County social media sites are subject to approval by the County Manager.
2. All social media sites shall be established and administered by the Communications Team.
3. The Social Media Content Moderators are the designated administrators of the social media site and shall monitor content regularly to ensure adherence to the County’s Social Media Policy.
4. The County shall ensure that the County is identified in a clear and consistent way on County-managed social media sites and make clear that they follow the County’s Social Media Policy.
 - a. Profile images on social media sites shall contain the County logo.
5. The County shall deliver prompt, courteous and responsive communications on County-managed social media sites that are sensitive to the needs and concerns of the public, and respect privacy and individual rights.

- a. Wherever possible, such sites shall clearly indicate that any articles, comments, and any other content posted or submitted for posting are subject to public disclosure;
 - b. Users and visitors to social media sites shall be notified that the intended purpose of the site is to serve as a mechanism for communication between County departments and members of the public.
6. The County shall ensure all social media sites comply with the *Freedom of Information and Protection of Privacy Act*.
7. The County shall ensure that the County's records retention schedules apply to social media formats and social media content.
8. County social media site articles and comments containing any of the following forms of content shall not be allowed:
 - a. Comments not topically related to the particular site or blog article being commented upon;
 - b. Profane language or content;
 - c. Personal attacks on individuals or specific groups;
 - d. 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;
 - e. Sexual content or links to sexual content;
 - f. Conduct or encouragement of illegal activity;
 - g. Content related to non-County related sales, advertising or promotions;
 - h. Content for the purposes of promoting a candidate for municipal, provincial, or federal election;
 - i. Information that may tend to compromise the safety or security of the public or public systems;
 - j. Content that violates a legal ownership interest of any other party; or
 - k. Content believed to be inappropriate in the opinion of the County Manager.
9. The County reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law.
10. The County will approach the use of social media tools as consistently as possible, department-wide.
11. The County's website shall remain the County's primary and predominant internet presence.
 - a. Wherever possible, content posted to social media sites will also be available on the County's website.

- b. Wherever possible, content posted to County social media sites should contain links directing users back to the County’s website for more information, forms, or documents.
12. Employees representing the County via County social media sites must always conduct themselves as a representative of the County and in accordance with all County policies.

According to its mandate, the Communications Team has a responsibility to promote the openness, transparency and accountability of the work and business of the County through:

- a. Sharing information;
- b. Educating the public, and;
- c. Promoting departments, programs, and services.

To ensure that information about the County’s decisions, programs, services, and initiatives reaches as many people as possible, the division takes a balanced approach – using both traditional communication methods as well as various online communication methods.

While the use of online and social media sites and/or networks creates new opportunities for enhanced communication and collaboration with residents and other County stakeholders, it also creates new responsibilities for County employees.

The Communications Team (and the organization as a whole) recognizes that social media networks are powerful communications tools that can have a significant impact on organizational, personal, and professional reputations. Because they blur the lines between personal voice and corporate voice, the following policy has been developed to establish standards and expectations for employees when using social media to discuss, share, or comment on the business of the County.

Please note: For the purpose of this policy “social media sites” and/or “social media networks” refer to those sites/networks whose content is open to the general public.

GUIDELINES:

The County aims for effective and efficient communications with residents. This policy provides guidance in the following areas:

1. Site Selection/Establishing New Accounts

2. Site Administration
3. Site Content
4. Protocols
5. Employee Expectations and Personal Responsibility
6. Records Management and Retention
7. Privacy
8. Copyright, Branding, Logos

1. Site Selection/Establishing New Accounts:

The Communications Team will serve as a centralized resource for the oversight and use of social media tools and sites by the County and its divisions, as well as for the creation and maintenance of content on those sites.

The County will maintain a series of corporate accounts on various social media tools. Final approval for the corporate use of new social media tools and/or new accounts on social media sites already in use by the corporation will be the responsibility of the County Manager.

Criteria for adopting new social media tools – or establishing new accounts within social media sites already in use by the corporation – will include, but not be limited to comprehensive research that:

- a. Demonstrates the need for the specific tool/why it is required;
- b. Demonstrates the added benefits of using the tool;
- c. Demonstrates a content approval process to ensure that posted content is consistent with corporate messaging and standards;
- d. Demonstrates that the use of the new tool will not interfere with the credibility of the County's other established social media sites/networks;
- e. Addresses any legal concerns; and
- f. Identifies appropriate staff resources that would be required to establish and maintain the new account according to the best practices identified in the County's Social Media Implementation Strategy.

2. Site Administration:

The use of all social networking sites by the County will adhere to:

- a. Applicable provincial and federal laws, regulations and policies;
- b. The Terms of Service of each social networking site; and
- c. All Administrative, Human Resources, and Records Management policies and other applicable County policies and guidelines.

All new and existing social media tools being used to conduct County business will be established and administered by an appointed social media content moderator from the Communications department.

All County social networking moderators will be trained regarding the terms of the County's Corporate Social Media Policy and Social Media Guidelines, including their responsibilities in regard to records management and retention, privacy and reviewing content submitted for posting to ensure compliance with the policy, and the County's web writing guidelines and online netiquette guidelines.

3. Site Content:

Pre-approved content for consideration and potential inclusion on corporate social media sites will be provided to the Communications Coordinator via email to: ppashko@lsac.ca – by staff from across the organization.

Updates to social media sites, pages, accounts and channels being used for corporate business will be created and posted by the Communications Team in accordance with the best practices for timing and content.

Where possible, all social networking sites will clearly indicate that they are maintained by the County and will have the County logo and contact information displayed. Wherever possible, such sites shall clearly indicate that any articles, comments, and any other content posted or submitted for posting are subject to public disclosure. Users and visitors to social media sites shall be notified that the intended purpose of the site is to serve as a mechanism for communication between the County departments and members of the public.

Wherever possible, social networking sites will link back to the official County web presence site for forms, documents, and other information.

County social networking pages and their content will adhere to the policies and guidelines of each individual social networking site and social media tools will be used as consistently as possible, department wide.

County social networking sites will include an introductory statement that clearly specifies what content is unacceptable and will be subject to removal without notification. Content and comments containing any of the following forms of content shall not be allowed for posting:

- a. Applicable provincial and federal laws, regulations and policies;

- b. Comments not topically related to the particular site or blog article being commented upon;
- c. Profane language or content;
- d. Personal attacks on individuals or specific groups.
- e. 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;
- f. Sexual content or links to sexual content;
- g. Conduct or encouragement of illegal activity;
- h. Content related to non- County related sales, advertising or promotions;
- i. Content for the purposes of promoting a candidate for municipal, provincial, or federal election;
- j. Information that may tend to compromise the safety or security of the public or public systems;
- k. Content that violates a legal ownership interest of any other party; or
- l. Content that is believed to be inappropriate in the opinion of the Communications Coordinator or County Manager.

Notwithstanding the above, the County reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law.

4. Protocols:

The social network content moderators will review the County's social networking sites regularly to ensure that they remain in compliance with the policy guidelines for appropriate content. Content not in compliance shall immediately brought to the attention of the Communications Coordinator or County Manager.

Content that is flagged by the Communications Team for potential removal will be reviewed by the Communications Coordinator and/or County Manager to determine the appropriate course of action.

Content or status updates that generate negative feedback from the public or feedback that is sensitive or controversial in nature will be reviewed by the Communications Coordinator and/or County Manager to determine the appropriate course of action.

Content or status updates that request feedback from the general public will be reviewed and approved by the Communications Coordinator and/or County Manger before they are posted.

5. Employee Expectations and Personal Responsibility:

Staff should consider the following when discussing, sharing or commenting on County business when posting as official corporate social media content moderators or when discussing, sharing or commenting on County business on personal social media sites, networks and/or personal websites:

Use of an employee's County email address, communicating in an official capacity, or discussing County business – on personal or corporate social media sites and/or personal websites – will constitute conducting County business.

Employees representing the County as social media content moderators – and those who choose to discuss County business within their posts to personal social networking sites and/or personal websites – must conduct themselves at all times as a representative of the County and in accordance with this policy and all human resource and administrative policies, and takes into consideration the following:

- Confidentiality of Information;
- Freedom from Harassment;
- Internet Usage;
- Public Criticism; and
- Violence in the Workplace.

Any County employee engaged in online, electronic dialogue that involves information about County business – including dialogue or information posted to personal social networking sites and/or personal websites – is also required to meet a standard that mandates:

- **Transparency of Origin.** The County requires that employees disclose their employment or association with County in all communications with citizens, customers, the media or other County stakeholders when speaking on behalf of County.
- **Accurate Information.** Communications on the County's behalf, on all social networking sites, should be based on current, accurate, complete and relevant data. The County will take all reasonable steps to assure the validity of information communicated via any channel, but it is the employee's responsibility to assure accuracy in the first instance. Anecdotes and opinions will be identified as such

- Ethical Conduct. The County will not conduct activities that are illegal or contrary to the County's corporate policies.
- Protection of Confidential and Proprietary Information. County employees must maintain the confidentiality of information considered confidential, including company financial and business information, citizen and/or customer personal information, personal information about County Council, partner and/or supplier information, personal employee data, or any information not generally available to the public.

To protect personal information, the County's Communications Team will not cite vendors, suppliers, clients, citizens, co-workers, or other stakeholders in posts, blogs, or comments without their previous approval.

County-staff-to-County-staff communication for the purpose of conducting official County-related business should not take place using any social media tool.

Recognizing the benefit of monitoring online stakeholder input into County issues – and the potential need for the County to respond to and/or correct information – the Communication Team can access social media sites including: Facebook pages, Twitter feeds, YouTube channels, blogs and discussion forms – during work hours provided that they are related to or contain posts or discussions related to County business.

Corporate responses to online postings, blogs and discussion forums about County-related business will be co-ordinated through the Communications Team.

Staff will not use the County logos or any other corporate/County images or iconography on personal social media sites and/or personal web sites or to promote a product, cause, or political party or candidate.

County employees who fail to comply with this policy will be subject to discipline up to and including termination of employment. In addition, depending upon the nature of the policy violation or the online channel/page content, participants may also be subject to civil and/or criminal penalties.

6. Records Management and Retention:

Posts/user content which are considered to be official records of the County:

- Must be accessible and readable during their entire retention period.

- Must only be deleted/purged in accordance with the County's Records Retention Schedule.
- Must meet the requirements for deletion/purging under *The Municipal Government Act* regarding destruction as well as the *Freedom of Information and Protection of Privacy Act*.

Deleted posts/user content which contains the personal information of people must be retained for a minimum of one (1) year from the date of the post if no other retention period applies to the post.

Posts/user content which is considered to be transitory records of the County may be deleted/purged from the website as soon as they are no longer needed.

Even after being deleted/purged, copies of posts/user content may remain viewable in cached and archived pages or if other users have copied and stored their user content

and therefore, may be disclosable under applicable privacy legislation and under the rules of discovery for litigation.

The County's social media moderators will be responsible for ensuring that applicable content is retained for the appropriate period of time under the County's records retention schedule.

7. Privacy Policy:

Posts/user content containing personal information must be in compliance with:

- The requirements for the collection of personal information as prescribed within *Freedom of Information and Protection of Privacy Act*.
- The requirements for use and disclosure of personal information as prescribed within *Freedom of Information and Protection of Privacy Act*.
- The requirements for securing personal information as prescribed within *Freedom of Information and Protection of Privacy Act*.

Whenever possible, notification of the following must be visible and precede any data collection fields for personal information:

- Online communities are not private; even posts/user content submitted to a limited-access (password protected) community may be accessed by a wider audience than originally intended.
- Personal information, which includes IP address, is being collected, managed, processed and/or stored by a third-party service provider and is therefore, not in the sole domain, custody and control of the County.
- Personal information may cross the border to a foreign jurisdiction and will therefore be subject to the governing laws of that jurisdiction.
- All social network sites and entries shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure.

8. Copyright, Branding, Logos:

Departments comply with the *Canadian Copyright Act* and ensure that the ownership rights associated with works subject to copyright are fully respected in all applications.

All communications materials including text, photographs, images, and multimedia materials that are authorized, accepted, and paid for by the County can be used for all and any future reproductions required for any communications by the County. The County retains limited copyright to the original materials. These finished materials can only be reproduced with the permission and acknowledgment of County.