

TO: David Chanski, City Administrator/Clerk  
FROM: Daniel Eick, Assistant City Administrator  
RE: City social media & communications policy  
DATE: July 26, 2023

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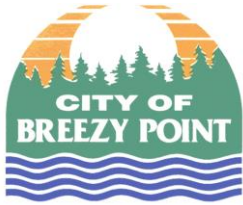


### **Summary**

At the direction of the City Council staff has been working to develop various improvements to the City's communications and planning processes. A critical part of that process is the development and implementation of a standard communications policy and its associated performance guidelines. A copy of the proposed City of Breezy Point Social Media & Communications Policy is included below.

### **Council Action**

Staff is seeking Council approval of the attached City of Breezy Point Social Media & Communications Policy.



# City of Breezy Point

## The City of Breezy Point, Minnesota Social Media & Communications Policy

### I. PURPOSE

The City of Breezy Point (the City) has an overriding interest in managing, approving, and supporting the proper use of public networking tools to enhance communications, streamline processes and foster productivity. This policy establishes the City's position on the utility and management of media, both physical and digital, and provides guidance on its management, administration, and oversight.

To better address the fast-changing landscape of communications, and better publish information digitally and physically, the City recognizes the need and value of communications to enhance public participation, collaboration and information exchange. As such, the City will utilize physical and digital media to further the City's strategic goals, promote its values, and provide customer service online where appropriate. Use of internet-based communications and social media websites by the City shall be for official City purposes only.

Guidelines outlined in this policy shall not be construed or interpreted in any way to infringe upon a person's right to free speech under the Minnesota or United States Constitution.

### II. DEFINITIONS

**Social Media** refers to the various activities that integrate technology, social interaction, and content creation. Through social media, individuals or groups can create, organize, edit or comment, combine and share content. Social media uses many technologies and forms, including social-networking, blogs, wikis, photo-sharing, video-sharing, podcast, social bookmarking, mashups, widgets, virtual worlds, microblogs, Really Simple Syndication (RSS) and more.

**Physical Media** refers to physical materials used to store or transmit information in communications used for the physical distribution of content to residents and customers. Examples of this include, without limitation, white papers, printed newsletters or fliers, electronic signage, tapes, compact discs, DVD's, CD-Rom's, portable hard disc's, etc.

**Digital Media/Signage** consist of digital displays utilizing technology such as LCD, LED, projection, and e-paper to display digital images, video, web pages, data, or text.

**Social Networks** use technology to communicate, share information and encourage user engagement. Social media platforms have been identified as limited public forums where speech by certain group(s) or discussion of certain subject(s) is or can be held. Regulation of these platforms by the City shall be subject to all applicable State and Federal Government regulations.

**Social Media Account** means any registration, login credential, tool, forum, platform, website, or network that is created or maintained by a department or contracted service for the purpose of establishing or perpetuating a social media presence. Not all forms of social media may be appropriate for use by City departments, contracted services or programs and all accounts must obtain approval from the associated Departmental or City controlling entity.

**Social Media Content** includes any materials (physical or digital), documents, photographs, videos, graphics, and other information that is created, posted, distributed, or transmitted using social media internet sites or social media tools.

**Posts** are considered speech whether in a written message, picture, graphic, advertisement, notification, feed, stream, transmission, broadcast, podcast, video, instant message, text message, blog, microblog, status update, wall post, comment, and any and all other forms, means or attempts at collaboration or communication that is uploaded, posted to, or otherwise displayed on or transmitted by, any social media account or network.

**Profile** is the identification of the agency or person that manages or owns a social media account.

**Hashtags (#)** are short words or phrases used within a message to identify a keyword or topic of interest and facilitate a search for it. Hashtags are generally preceded by the pound sign (#) and are maintained by the associated social media platform.

**Tag or Tagging** someone or some business or organization means a link is created to that person's or organization's profile. The person/organization that is tagged in a post will be notified and the post may be added to the person's/organization's timeline or newsfeed.

### III. SCOPE

The scope of this policy includes the use of social, physical, and digital media by The City as communications platforms and the acceptable use of said media by employees or contractors of the City when conducting business.

#### A. Goals for City Use of Social, Physical, and Digital Media

1. To provide City information to residents and businesses.
2. To enhance the City's communication efforts.
3. To serve as a source to build awareness, interest and quality of life in the City.
4. To provide rapid disbursement of supplemental emergency information to augment existing emergency information systems.
5. To attract the public to the City's website.
6. To attract the public to City services and events.
7. To disseminate concise and relevant information to City followers.

### IV. ROLES & RESPONSIBILITIES

#### A. Roles

Authorized media users include City of Breezy Point personnel responsible for the use, administration, management, monitoring and/or retention of physical, social, and digital media related tools or websites and/or media content in the name of, or on behalf, of the City. These administrators include the City Administrator, the Chief of Police, and their designee(s).

#### B. Responsibility of Administrator/Designee(s)

1. The primary point of contact for the City in media related communications and

holds accountability for effective oversight, coordination, and management of information for assigned social, digital, and physical media.

2. Control access and maintain security for any related social media accounts or physical communications material (properly store documents, secure password maintenance, or deactivate social account access due to change in staffing where necessary).
3. Assign and regulate access to social media pages for other assigned designees and editors; limit social media account access to those with a clear business purpose, including, but not limited to, those authorized to post content on City social media accounts on behalf of the City.
4. Ensure that a Media Strategy Plan is submitted to the City Administrator's Office before any new communications strategy or tool is utilized by a department, program, service, or individual. Respond to all inquiries related to communications development or planning regarding new or current media.
5. Manage media related communications, such as adding or creating content and responding to inquiries where necessary. Informing the City Administrator or Chief of Police of concerns when appropriate.
6. Review active media, press, and account activity daily during normal business hours for exploitation or misuse.
7. Consolidate or delete social media accounts that are inactive or infrequently updated.
8. Monitor and measure social media, analyzing effectiveness and facilitating continuous improvements.
9. Attend available training and/or meetings regarding government communications.
10. Employ best practices for media and communications use by governments.
11. Collaborate with records management to ensure that the City is adhering to all applicable federal, state, county and City laws and regulations.

## V. POLICY

### A. General

1. All media is considered an extension of City communications and shall comply with related policies. The City website (<https://www.breezypointmn.gov/>) will remain the primary internet presence.
2. All use of social, physical, or digital media shall comply with all applicable federal, state, county and City laws, regulations, and policies. This includes adherence to, but will not be limited to, established laws and policies regarding copyright, records retention, Freedom of Information Act (FOIA), Minnesota Government Data Practices Act, First Amendment, Americans with Disabilities Act (ADA), Health Insurance Portability and Accountability Act (HIPAA), privacy laws, and others as they apply to digital or physical media. This also includes City design and branding standards; policies relating to Information Technology and other relevant policies established by

the City; and norms of professional business communication.

3. All use of media shall directly support the City's strategic goals. The most appropriate use of social, physical, and digital media tools is as an informational channel to broadcast City messaging to the widest possible audience.
4. All use of social, physical, and digital media shall be directly approved by the appropriate administrator/designee(s) and shall not include information supporting, enacting, or providing a service for a non-government or private sector entity.
5. Any individual with access to City social media accounts shall:
  - a. Not use their social media account for personal use, to promote or reply to personal contacts or to provide personal information or opinions.
  - b. Keep all communication on social media professional and follow established policies regarding workplace professionalism.
  - c. Not place any City technology at risk due to use of social media.
  - d. Individuals with access to City social media accounts do not have an expectation of privacy regarding their use of City social media.

B. Use

1. The City Administrator, or an authorized designee(s), shall develop and implement relevant communication's Master Planning for all platforms as outlined in this document. Final approval for any new social, physical, or digital media planning is given to the Office of the City Administrator and is dependent upon said approval prior to execution.
2. The Office of the City Administrator and Chief of Police, or an authorized designee(s), will administer the City's official media accounts and responsibilities. Official City communications will be used for purposes of connecting, engaging, and informing the community to raise awareness of policy information, City business, accomplishments, events, programs, services, news, and updates, conduct community outreach and engagement, and disseminate time-sensitive and emergency alerts.
3. No official City media, whether digital or physical, shall be used as a political, charitable, religious, or fundraising platform including, but not limited to, campaigns and fundraising for election to public or private office or public or private ballot issues; general advertising/promotion of third-party businesses; or for lobbying. The City, however, reserves the right to post neutral information regarding upcoming relevant elections.
4. As a limited public forum, speech and opinions expressed on City social media platforms will be monitored during business hours and the City will only participate in conversations as appropriate. City account managers should be aware hiding and deleting posts may violate Federal free speech regulations. Any post edited, hidden, removed or otherwise moderated will be treated as a public record. Removal of content will cite the violation of policy or standard in writing and be logged.
5. Prior to posting on any social media site, each authorized employee shall sign an

acknowledgement of receipt of this policy indicating they have read and understand all policy provisions and agree to be bound by them as such.

C. Content

1. *All official City of Breezy Point Content Made by Authorized Users* will be used to share general information and increase public awareness of City policies, programs, services, news/updates, as well as serve as an immediate form of communication. All material shall be consistent with the City of Breezy Point's mission, vision, and values.
  - a. Types of acceptable information released by an official designee or City account, in a text, image or video format include, but are not limited to, information about a City-sponsored or endorsed program, service or event, policy decision/outcome, agenda summaries, general information or history about the City, public safety prevention and information, and alerts and/or notifications made on behalf of the City.
  - b. Unacceptable content includes information on litigation or claims that could be brought against the City; non-public information; personal, sensitive, or confidential information; and medical information that violates a persons' Health Insurance Portability and Accountability Act (HIPAA) protections. Additionally, content promoting, fostering or perpetuating discrimination on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, status with regard to public assistance, or military and veteran status or depicting profane, obscene, violent or pornographic content and/or language is in violation of this policy and subject to removal as such.
  - c. Display City branding on all material including official City logo/seal unless associated branding is already posted where the material is stored.
  - d. Display official website, address, contact number/information, and official email account on all material unless associated information is already posted where the material is stored.
  - e. Comply with accessibility requirements.
  - f. Content should be strategically crafted and mindful of those with mobile devices where possible.
  - g. Enhance the City of Breezy Point, while being professional and user friendly.
2. *Comments and Responses*
  - a. Comments and replies on City posts from the public are allowed and will be monitored by the aforementioned administrator or their designee for unacceptable content including defaming, harassing, threatening or otherwise violating the legal rights of others, including their privacy; misrepresenting one's person, background or character; posting any defamatory, infringing, obscene, false or unlawful material; selling, advertising or exchanging any

goods or services unless expressly allowed; statements/threats or calls for violence or attacks of sexual assault or sexual exploitation, including derogatory terms related to sexual activity; calling for self-injury suicide or harm of a specific person or group of people; posting any copyrighted material; and/or spam or bot-generated content; and those listed in Section V.C.4.

- b. Responses from the City to comments/replies from the public will be approved at the discretion of the City Administrator, Chief of Police, or their designee(s) but will only be provided in situations where a specific question is asked about a City related policy, program, service or event and there is specific response, or respond to correct an inaccuracy in a discussion and there is misinformation about a City policy, program, service or event.
- c. The City reserves the right to hide a comment or content in violation of unacceptable practices without prior notification should it violate this policy or relevant State or Federal Government regulations (see also Section VIII.A.).

### 3. *Sharing, Liking and Following*

- a. The City of Breezy Point reserves the right to like, share, retweet, or re-post content from another social media account. A like, share or re-tweet of content does not imply or denote an endorsement of that account or content.
- b. The City of Breezy Point social media accounts may like or follow official public local, county, state, and federal government agencies and/or businesses or non-profit agencies contracted to do business on behalf and in conjunction with the City, or as approved by the City Administrator or Chief of Police.

### 4. *Disclaimer of Guidelines*

- a. The City of Breezy Point social media accounts, where possible, as well as the City website, will have the following disclaimer of guidelines posted or provide a link to them:

*Comments expressed on this page do not necessarily reflect the opinions and position of the City of Breezy Point, its Council, administration, officers, or employees.*

*The City of Breezy Point's use of social media is intended to be used for informational purposes only. If you wish to contact the City Council or Administration or to request City services, please visit the City's official website at <https://www.breezypointmn.gov/>.*

*Under Minnesota law, this is a public record. If you do not want your name, profile, comment and/or post released in response to a public-records request, do not post to this page.*

*The City of Breezy Point's Accounts are maintained and moderated by the Office of the City Administrator, Chief of Police, and their designee(s) during normal business hours to ensure that posted comments are constructive and*

*suitable for all readers while respecting a range of opinions and points of view.*

*Anyone posting comments contrary to the platform's Terms of Use may be prohibited from future participation. By participating, users agree to send and receive messages that are both proper and related to the posting, discussion, or forum topic.*

*The following actions are unacceptable practices: defaming, harassing, threatening, or otherwise violating the legal rights of others, including their privacy; misrepresenting one's person, background, or character; posting any defamatory, infringing, obscene, false, or unlawful material; selling, advertising, or exchanging any goods or services unless expressly allowed; statements / threats or calls for violence or attacks of sexual assault or sexual exploitation, including derogatory terms related to sexual activity; calling for self-injury or suicide of a specific person or group of people; posting any copyrighted material; and/or spam or bot-generated content.*

*The City does not endorse any content, viewpoint, product, or service linked from its social media sites and shall not be held liable for any losses caused by reliance on the accuracy, reliability, or timeliness of shared information. The City of Breezy Point reserves the right to hide a comment or content in violation of unacceptable practices without prior notification.*

#### 5. Security

- a. Authorized users should employ strong passwords that cannot be easily compromised.
- b. Account passwords should be periodically changed for security purposes.
- c. Authorized users of accounts should not share access with anyone other than another authorized user or administrator.
- d. Third-party applications may be used if it serves an appropriate and valid business purpose, adds to the user experience, and originates from a trusted source. A third-party application may be removed at any time if the City determines it causes or potentially contributes to a security breach, the spread of viruses, or is otherwise deemed inappropriate.
- e. All relevant State or federal record retention and security storage requirements for media both digital and physical media should be upheld where applicable.

#### D. Employee Guidance for Participating in Social Networking

The City of Breezy Point understands that social networking and internet services have become a common form of communication in the workplace and among stakeholders and citizens. Employees who choose to participate in social networks are doing so voluntarily and, as a City of Breezy Point employee, should adhere to current employee policies.

## VI. EMERGENCIES AND EMERGING INCIDENTS

During emergencies or emerging incidents, all social, physical, and digital media content and posting



must be coordinated with the Office of the Chief of Police (and City Administrator where necessary) as part of its emergency support function. Pre-scheduled social media content should be unscheduled or removed. Depending on the incident, the City Administrator or their designee(s) may be directed by the Chief of Police, or a relevant Emergency Manager, to point to specific social or physical media accounts that will serve as the main source(s) of information. As incidents evolve over time, the City may need to change how social and physical media assets are used from strategic to tactical perspectives and reserves the right to alter communication strategies where required.

## **VII. Procedure**

Account Establishment and Administration shall follow the below guidelines.

### **A. Establishment of an Additional Account on an Existing Social Media Platform**

1. The City Administrator, Chief of Police, or their designee(s) can create additional account(s) and/or merge or delete existing social media platforms currently utilized by the City.

### **B. Establishment of a Social Media Account on a New Platform**

1. The Office of the City Administrator and authorized users can review the City's social media needs. The Office of the City Administrator will determine if and when the addition of a social media platform is necessary based on perceived potential value, function, opportunity and relation to the communication strategy as approved by the City Administrator.
2. The City must be able to immediately edit or remove content from City social media sites that does not adhere to this policy. All passwords, usernames, or other information necessary for removal of content shall be provided to the Office of the City Administrator or Chief of Police at the time of creation of a social media site or account.
3. Only an officially authorized City of Breezy Point email address shall be associated with the account and profile.

### **C. Profile**

1. Where possible, the social, physical, or digital media profiles linked to accounts or services should include a hyperlink back to <https://www.breezypointmn.gov/> for the purpose of providing additional information, resources, documents and other information pertaining to the City.
2. Where possible, the profile should clearly indicate that all contents and materials, physical or digital, are subject to public records laws.
3. Where possible, the profile should also include the disclaimer language listed previously in Section V.C.4 or contain a link originating on the City website clearly denoted as the above disclaimer.

### **D. Optional Training**

Upon designation as a newly appointed City Communication's official, the Office of the City Administrator, Chief of Police, or designee(s) will provide training, if

requested, to the new user(s) on how to access relevant accounts and best practices for use in social, digital, or physical content creation, and branding.

## VIII. PUBLIC RECORDS AND ARCHIVING

### A. Preservation of Media Records

When the City produces social, digital, or physical media to conduct City business, it must preserve all documents and material related to the production as a public record, as it would any other public record. This includes preserving posts and comments made by the public in response to official posts.

1. Comments deemed inappropriate should be hidden, but not deleted, only when in violation of social media conduct guidelines. See Section V.C.2.c.
2. Archive/maintain all media content used in communications (e.g., comments, posts, images, videos, and physical materials as outlined above) in compliance with Minnesota's Public Records laws and applicable County or City policies.
3. Accounts that are archived.
  - a. All official City of Breezy Point social media accounts should be archived. Future accounts may be added at any time.
  - b. Social media accounts are by definition searchable history feeds, but archiving is necessary to maintain records of removed content, edited content and direct messages.
4. Accounts that are not archived:
  - a. Campaign accounts of those running for office or campaign account(s) of incumbents.
  - b. Personal accounts or emails of elected officials, employees, contractors, and officers.
  - c. Public pages and profiles that are followed or linked by official City of Breezy Point accounts.
5. Requests for public records related to content on City's social media accounts shall be made to the Office of the City Administrator.

## IX. SECURITY OF SOCIAL NETWORK

The following strategies can minimize the risk of a security breach related to a City website or resource.

### A. Protection Strategies

1. Follow best practice password guidelines when creating or changing passwords for social media platforms.
2. Never leave computer(s) unattended or unlocked when logged on to a social media account.
3. Only the City Administrator, Chief of Police, and their designee(s) should know login and password to social media account(s).

4. At least two people should have the login and password.
5. If user(s)/moderator(s) change, login and password should also change.

Even with these measures, sites are not immune from criminal attacks. One sign of intrusion is defacement, in which your webpage or resource is replaced with an attacker's message. Another indicator might be complaints of emails containing a virus or fraudulent messages coming from a City account.

**B. Network Attack Protocol**

If the security of any given City website, resource, or account has been compromised:

1. Contact the Office of the City Administrator and Chief of Police as soon as you notice a problem.
2. Change the login and password information for the account immediately if possible.
3. Acknowledge security breach to public followers if necessary to prevent further incidents. The City Administrator or Chief of Police will decide whether an acknowledgement is necessary and assist in developing a communications strategy.
4. Look for signs of damage or altered material and make necessary corrections.
5. Report incident to City Administrator's Office, Chief of Police, and IT Department or associated IT Contractor.