



To: Department Directors

From: Mike Bonfield 
City Manager

Date: November 14, 2013

RE: Internet Social Network Policy

As more and more citizens in our community make the shift towards, or include the use of, social technologies to receive and share information and communicate their opinions, it is vital that the City includes these technologies as part of its efforts to enhance customer service and outreach and increase citizen involvement. Therefore, we have established the attached policy for interaction with Social Media tools and their associate technology.

Should you have any questions or concerns, please feel free to come by and discuss them with me.

**CITY OF ST. PETE BEACH
INTERNET SOCIAL NETWORK POLICY**

Section 1. INTRODUCTION:

Only the use of certain ISN Sites is authorized with a focus of driving visitors to our already established websites.

a) What are common terms used throughout this policy?

Internet Social Networking (ISN) Sites - shall mean Web applications and any similar applications that are utilized as social networking vehicles on the Internet. See Appendix A for a list of ISN sites, which may be utilized by a department if approved by the City Manager.

Contributor - shall mean a City employee who has been designated in writing by the Department Director to have the authority to contribute to that Department's ISN Site on behalf of the City Department.

Information Technology Specialist - shall mean the person so designated by the City Manager or designee.

City Department- shall mean any Department under the oversight and direction of the City Manager.

Departmental Contribution - shall mean any information published to a City ISN Site by a Contributor at the direction of the Department Director.

Section 2. MANAGEMENT/RESPONSIBILITY:

Ultimate oversight authority is vested in the City Manager. This authority may be delegated to Department Directors.

- a) The City Manager or his designee shall be responsible for approving departmental use of an ISN site and overseeing use of City ISN Sites.
- b) The City Manager, at his discretion, has the power to require any City Department to disable and cease use of a Department's ISN Site.
- c) City Manager shall authorize any ISN Site the Department intends to maintain.
- d) Department Directors may establish internal policies or rules for contributions to ISN Sites provided they are approved by the City Manager.
- e) Before establishing a social media account or an ISN site, the Department Director shall:
 - i. Contact the City Manager to discuss objectives and desired outcomes for

utilizing social media and to help determine its effectiveness in reaching the communication objectives.

- ii. Obtain formal approval, which shall specify all authorized users prior to establishing any social media account.
 - iii. Obtain a completed User Agreement Form (Appendix D) for each Authorized User and store that agreement in the employee's personnel file.
 - iv. Establish the social media account using a Stpeteach.org e-mail address created by Information Technology Specialist specifically for the account and provide all access credentials to both the Information Technology Specialist and the City Manager, including all subsequent modifications to credentials, if applicable.
- f) When Establishing the social media account and during Maintenance of the social media account, the Department Director shall:
- i. Include an introductory statement that clearly specifies the purpose and topical scope of the social media presence. Where possible, department social media accounts should link back to Stpeteach.org for the purpose of downloading any forms, documents and other information.
 - ii. Conspicuously post the Terms of Use (Appendix C).
 - iii. Enable features for public comments, if such capability exists, and comply with and enforce the posted Terms of Use Agreement.
 - iv. Make available to the City Manager all content such as text, images, and video placed on social media accounts for possible placement on Stpeteach.org.
 - v. Maintain compliance with all applicable Federal, State and City requirements, policies and procedures relating to records retention and public records requests.

b) What is the primary purpose of using City ISN Sites?

The primary purpose of a City ISN site is to engage citizens via alternative venues and drive quality traffic to our internet sites. ISN's focus is not to have constituents remain within and correspond through the ISN Site but to use it to link to the City internet site so that meaningful information can be exchanged. This technology allows connection with prospective and current constituents where they are seeking information. Driving these initial contacts to our web sites will allow us to advertise City services; provide notice of Government activities; provide information regarding St. Pete Beach to residents and non-residents of the City; maintain and build relationships; and gain market insight.

Section 3. KEY ROLES:

There are four (4) key roles in utilization of ISN Sites. A limited number of designated Contributors prepare Departmental Contribution; they are prohibited from including personal remarks outside the scope of the public purpose for which they participate, in that capacity. The Information Technology Specialist shall monitor overall ISN Site content and research new social networking opportunities. The Information Technology Specialist shall keep the City Manager or his designee apprised of developments.

a) Contributors:

- i. Contributors do not publish anything (on social networking sites) that may be construed as inappropriate (such as obscene or libelous material).
- ii. The identities of Contributors shall be topic/title-based, not staff name based unless providing this information is consistent with the public purpose for use of the ISN Site as determined by the effected Department Director. The Contributor's name shall be available for administrative use.
- iii. Violation of acceptable use may result in revocation of contributor status and disciplinary action.
- iv. Contributors must review and understand this policy and prohibited activities enforced by City of St. Pete Beach and must acknowledge that violations of these policies may result in disciplinary actions by completing a Authorized User Agreement Form. (Appendix D)
- v. Contributors must not edit posts. Any post that violates the Terms of Use should be documented for records retention and then deleted from public view. The comment maker should then be notified that he or she has violated the Terms of Use, specifying any and all Terms of Use that were violated.
- vi. Any published content is persistent in the public domain. The City of St. Pete Beach is responsible for all content published by authorized users. When speaking on behalf of the City, it should be assumed that all communications are in the public domain and available for publishing and discussion in all forms of media.
- vii. Contributors must consult the City Manager before discussing City of St. Pete Beach related matters on social media accounts or in the public domain.
- viii. Contributors must understand the perception of their City of St. Pete Beach association in online social networks. If they identify themselves as a City of St. Pete Beach employee or have a public facing position for which their City of St. Pete Beach association is known to the general public, they must ensure their profile and related content (even if it is personal and not an official nature) is consistent with how they wish to present them as a City of St. Pete Beach

professional, appropriate with the public trust associated with their position, and conforming to existing standards that already exist in City of St. Pete Beach policies.

- ix. Contributors must have no expectation of privacy once they have introduced yourself publicly.
- x. Contributors must ensure all content posted by Authorized Users to City social networking accounts represents the City's point of view and not those of individual employees. If they are in doubt, they must contact the City Manager.
- xi. Contributors must exercise caution while interacting with any external entity, both known and unknown to the user, and the information that the Entity may provide or post. External Information shall not be utilized, commented on, or re-posted, unless the information has been verified or corroborated as true and accurate by independent and/or reputable resources.
- xii. Contributors must remain focused on customer service, the City of St. Pete Beach's mission and existing City of St. Pete Beach commitments. They must not allow Social Media use to interfere with primary job duties, unless such use is a primary duty or an essential job function.
- xiii. Contributors must respect copyright, fair use and financial disclosure laws. They must always protect sensitive information and personally identifiable information. They must not publish or report on conversations that are meant to be pre-decisional or internal to the City of St. Pete Beach unless management has authorized the release of such information.
- xiv. Contributors must ensure social media account implementation and use complies with applicable mandates, including, but not limited to: Section 508 of the Rehabilitation Act of 1973, Chapter 119 Florida Statutes, City Policies and any other applicable Federal, State or City policy.

b) Information Technology Specialist:

- i. Shall maintain a staff inventory which shall track who is contributing to the Internet, on behalf of what Department and specific scope/tasks involved.
- ii. Shall maintain an inventory identifying all ISN Sites and shall monitor site content for inappropriate content.
- iii. Shall develop and administer ISN Site training. Shall review overall City ISN Site content for adherence to primary focus area mentioned in Section I, above.
- iv. Shall provide authorized users information about their ability to access and utilize the social media tools authorized by their Department Director and the City Manager.

- v. Shall create a Stpetebeach.org email address to serve as the official e-mail account for all approved social media accounts.
- vii. Shall review all login credentials to social media accounts to ensure compliance with password strength requirements and compliance with established policies and industry best practices relating to information systems security.
- viii. Shall respond to any requests for guidance or opinion regarding technology or information systems security.

c) City Manager:

- i. Shall review proposals for use of new social media (ISN sites) and provide formal approval or denial.
- ii. Shall provide counsel to the Department as to the appropriate use of the social media tool and guidance as to the types of information that should be released.
- iii. Shall monitor content on each Department social media account to ensure adherence to the guidelines in this policy. Inappropriate use may result in the removal of the department page or account from these Social Media sites.

d) City Attorney's Office (Legal)

- i. Shall review and approves any departmental changes or additions to the Terms of Use Agreement, or the general disclaimer, as requested.
- ii. Shall render opinions on matters regarding disclaimers, terms of use, and privacy concerns as they arise.
- iii. Shall provide opinions on matters of public records.

Section 4. PROTECTIONS:

Use of ISN Sites holds the potential for unintended consequences. Users must remain mindful of internal security, personal privacy, rights of access and creating liabilities.

- a) **Internal Security** - Each social networking site shall be vetted through an internal security assessment to assure no risk to the City technology infrastructure in order to avoid collateral/viral damage.
- b) **Privacy Rights** - Contributing to ISN Site materials for public purposes should not expose individuals to personal identification and personal contact.

Section 5. SECURITY GUIDELINES

In general, approved users should show caution when interacting with external entities, those both known and unknown to the user. If at all in doubt of the legitimacy of any information sent to them, they must avoid said information.

The following guidelines should be adhered to:

- a) Employ strong passwords, with the assistance of Information Technology Specialist, which cannot be easily compromised by brute force attacks.
- b) Periodically change passwords to Social Media accounts, and immediately communicate any changes to Information Technology Specialist.
- c) Refrain from adding, installing, attaching or linking to any additional external services or applications that may potentially grant or enable access to the content, information or posts within the Social Media account.
- d) Use caution when accessing links received from External Entities.
- e) Exercise caution when utilizing shortened links (links that have been shortened for ease of relaying the original link), as these may lead to a malicious site. Avoid clicking on shortened links. Consider requesting the link be re-sent in another form.
- f) Be watchful for spoofed emails and/or website (seemingly official-looking communications that lead the user to a malicious website or attempt to solicit the user's personal or financial information). Consult the Information Technology Specialist regarding any security related matter.

Section 6. TERMS OF USE

It shall be the policy of the City of St. Pete Beach that the Terms of Use (Exhibit "C") must be continuously and conspicuously posted on each Social Media Account established and maintained by the City of St. Pete Beach, if such capability exists. The agreement shall also be posted on stpetebeach.org for easy access:

- a) City Departments setting up ISN Site accounts shall use Department e-mail accounts, Department name and phone number when possible.
- b) City Departments should restrict the "Find People" and "Follow People" options. Department Directors are discouraged from "following" private citizens or commercial profiles from within their government social networking profile. While the City cannot stop all people from being "Friends", "Fans" or "Following Us", Cities should not click onto the profiles of our "Friends", "Fans" and "Followers" without receiving approval from the City Manager
- c) City Departments should disallow comments and discussions on social profiles and refrain from participating in dialogue and online discussions with social profile visitors. Department Directors may allow exceptions to this rule where

allowing comments and discussions are necessary in order to achieve the public purpose for which the Department participates in the ISN Site.

- d) Accessibility Rights - ISN sites are governed by Section 508 of the Rehabilitation Act of 1973 regarding compliance and web accessibility for people with visual and hearing disabilities. Risks can be mitigated by following these standard operating procedures
 - i. For video captions and transcriptions, when available, include captions within videos. Maintain Section 508 compliant videos, captions and transcripts on the Department's website and attempt to link back to the Department website from the ISN Site.
 - ii. Regarding photos, name the photo after the description before uploading it to the social networking site. Write text captions and descriptions when the ISN Site makes these form fields available.
- e) **Liability Concerns –**
 - i. Regarding any copyright, slander, libel, general negligence, Sunshine, First Amendment or other concerns, contact the City Attorney's Office.

Section 7. SUNSHINE LAW AND PUBLIC RECORDS LAW COMPLIANCE:

Because of the need to assure compliance with these laws, certain policy constraints will be required. Public records law compliance mandates the primary purpose outlined in the introductory section to drive traffic to our existing websites where we are in control of preservation and retention. Care must be exercised by all members of Sunshine boards, committees or groups to avoid sharing information on ISN Sites that may be read by other members of their group.

- a) Any ISN Site content is a public record per Section 119 of the Florida Statutes. The exact responsibilities of the public body to retain these "documents" has not been clarified by an authoritative body therefore at this time the City Attorney's Office is prohibiting Contributors from deleting any work product created for any ISN site.
- b) Section 286 of the Florida Statutes prohibits members of public boards from meeting outside of the Sunshine. A violation of this Law may occur where two (2) members of the same board respond and reply to one another via an ISN Site. No elected officials or appointed officials of the St. Pete Beach City Government may contribute to or control any aspect of City governmental ISN Sites that relate to matters that may come before their Sunshine bodies.
- c) Under no circumstances should a Department create a public record in response to a public records request by altering the format in which the record currently exists without obtaining prior approval from the City Attorney's Office.

- d) These protocols and procedures may be supplemented in order to assure compliance with Sections 119 and 286 of the Florida Statutes.

Section 8. **PROHIBITIONS:**

In addition to those contained herein, please review the prohibitions in Appendix B.

Appendix A
Specific Social Media ISN Sites

A.1 General Considerations:

- i) The demographic profile of the intended target audience combined with the purpose and goal of the social networking initiative are the primary considerations for determining the appropriate use of internet social media marketing.
- ii) City Departments, after City Manager approval, are limited to using one of the ISN sites listed below.
- iii) In order to avoid creating new material on ISN Sites, use existing material from existing websites or previously published documents.
- iv) The City Manager's oversight of Department ISN Sites shall include developing new protocols; branding changes; policy changes; technical announcements/issues; providing written authorization prior to initiating any pilot program; and quality control, accuracy and appropriateness of all Departmental Contributions. (See Appendix C.)
- v) Departments using ISN Sites not included in the below Sections A.2 – A.5, prior to the effective date of this Policy may be allowed to continue such use by providing the City Manager a list all additional sites that the Department uses.

A.2 Twitter© (micro-blogs) - Twitter© sends short text messages to subscribers essentially saying "Hey check this out" and therefore is innocuous as long as the messages are appropriate. Conditions of use for Twitter© are:

- i) Provide contributor inventory to Information Technology Specialist and City Manager.
- ii) Messages must be appropriate for City Government context.
- iii) Limit quantity of tweets so as not to become a public annoyance.
- iv) Messages must be "teasers" referring to the City website for additional info. (Tweet example - "Great New cost savings program! Go here for info.")
- vi) Tweeter Identities (names/personalities) must be topic/title-based and shall not be staff name based.
- vii) There shall not be any links from the City Website to personal Twitter© sites.

A.3 Facebook© – Facebook© is simply a global-scale website collection of personal websites. Conditions of use for Facebook© are:

All new Facebook© sites must be reviewed and approved by the BTS Information Technology Specialist and City Manager.

- i) Department Directors shall manage Contributor content.
- ii) The City department and Information Technology Specialist shall view any new Facebook© sites to advise if they are consistent with the City branding, copyrights and message.
- iii) Department Directors shall determine whether to enable Walls. Enabling this option will require greater monitoring of the page by the Department.

A.4 YouTube© (video sharing) - YouTube© is a web community for sharing videos under

ten (10) minutes in length. Conditions of use of YouTube© are:

- i) This is a venue to offer short promotional videos (Parks and Heritage Village, for example).
- ii) The Department Director shall review and approve any videos made for YouTube©.
- iii) YouTube© is not a replacement for the City Streaming video system but rather another venue for promoting City Department programs.

A.5 **Blog** – Blog is a type of website usually maintained by an individual with regular entries of commentary, descriptions of events or other material such as graphics or video. Entries are commonly displayed in reverse-chronological order.

- i) Blogging by Contributors is not authorized unless approved by the City Manager or Department Director.
- ii) Allowing comments is a decision to be determined by the Department Director. Fully consider the dilemma of allowing comments. If allowing comments, utilization will be much higher due to active participation, but problems may arise. If blocking comments/post-backs, utilization may be significantly lower because it is not a "participative" environment.

Appendix B
Prohibitions

B.1 Employees:

- i) City Department employees shall not represent themselves as members of the City Government workforce on social networking sites regarding matters specific to their official duties unless providing this information is necessary and consistent with the public purpose use of the ISN Site.
- ii) City Department employees shall not disclose any confidential or proprietary information of the City on any personal web application.
- iii) City Department employees shall not create unauthorized web or ISN Sites that intend to represent or present itself as a City sponsored or authorized web or ISN Site.

B.2 City Government:

- i) No employee or volunteer shall access the personal (non-county) e-mail account of any City employee without first receiving authorization from that employee.
- ii) Links to web or ISN Sites or applications of elected officials shall not be allowed or accepted. Such links shall be removed from any City sponsored web site upon detection.

Appendix C
Term of Use

While this is an open forum, please keep your comments clean and appropriate. Inappropriate comments are subject to deletion by the administrator of this account. If you don't comply with the posting guidelines, an administrator will contact you and your message will be removed. If you post inappropriate content a second time, an administrator will contact you and you will be blocked from posting any more information to the site.

This forum is not monitored at all times. Do NOT use this forum to report emergency situations or time-sensitive issues.

Please keep the following guidelines in mind when posting:

- a) We do not allow graphic, obscene or explicit comments or submissions nor do we allow comments that are abusive, threatening, hateful or intended to defame anyone or any organization or comments that suggest or encourage illegal activity.
- b) 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, gender identity or sexual orientation will not be tolerated.
- c) Content posted by persons whose profile picture or avatar, username or e-mail address contains any of the aforementioned prohibited conduct will not be tolerated.
- d) Content should be related to the subject matter of the social media site where it is posted.
- e) We do not allow solicitations or advertisements. This includes promotion or endorsement of any financial, commercial or non-governmental agency. Similarly, we do not allow attempts to defame or defraud any person or financial, commercial or governmental agency.
- f) We do not allow information intended to compromise the safety or security of the public or public systems.
- g) You participate at your own risk, taking personal responsibility for your comments, your username and any information provided.
- h) All comments are subject to public records law.
- i.) The appearance of external links on this site does not constitute official endorsement on behalf of the City of St. Pete Beach.
- j.) In accordance with various international, federal, state and local laws, the online

user will make every attempt to protect copyright or other intellectual property rights. Credit must be attributed to author or creator of any original written work or image.

- k.) As with more traditional resources, the City does not act in place of or in the absence of a parent. The City is not responsible for enforcing restrictions which a parent or guardian may place on a minor's use of a social media resource.

Appendix D
Social Media/ ISN AUTHORIZED USER Agreement Form

Name: _____ Employee ID: _____

Position/Title: _____

Department: _____

Division: _____

Name of Project _____

Approved by _____

Department Director: (Director Signature) (Date)

Approved by _____

City Manager: (City Manager Signature) (Date)

I agree to use City-approved ISN sites for City business as appropriate and in compliance with the City Internet Social Network Policy. I understand that I must have approval from my Department Director and the City Manager to create a social media account on behalf of the City. I also understand that I am responsible for all postings made by me on City social media/ISN sites including those made in the comments sections.

I acknowledge that all City-approved Social Media/ISN Accounts are considered to be City property and may be monitored by officials of the City. I understand that employees do not have privacy rights in the use of City social media sites/ISN sites and the postings, data, access to or distribution of such materials is subject to Public Records laws.

I agree to abide by all security procedures set in place before accessing or posting to any social media ISN sites. I acknowledge that any abuse of any social media account/ISN site, including violation of the rules and guidelines set forth in this Policy or in any current or future modified Policy and Procedure can be grounds for disciplinary action.

I agree to follow the retention procedure set forth and understand all postings may be subject to records retention requirements, based on their content.

Printed Name

Signature

Date