St. Louis County
Social Media Policy

Policy
It is the policy of St. Louis County ("County") to determine, at its discretion, how its web-based social media platforms and resources will be designed, implemented and managed as part of its overall communication and information sharing strategy. Additionally, this policy provides guidance on best practices for personal use of social media sites.

Scope
This policy applies to all County employees, officials, appointed commission members, volunteers, consultants and contractors. Further, this policy applies to professional or personal use of any existing or proposed social media sites sponsored, established, registered or authorized by St. Louis County as well as personal social media use by County employees and agents.

Definitions
Administrator: A County employee responsible for managing a County social media account.

Agents: County employees, officials, appointed commission members, volunteers, consultants, contractors or anyone who represents the county in an official capacity. Also may be referred to as representatives.

Content: Refers to any written copy, photos, graphics, videos, live-video streams, comments or any form of communicative content exchanged between parties.

Social media: Internet and mobile-based applications, websites and functions, other than email, for sharing and discussing information, where users can post photos, video, comments and links to other information to create content on any imaginable topic. This may be referred to as "user-generated content" or "consumer-generated media." Social media includes, but is not limited to:

- Social networking sites such as Facebook, LinkedIn, X, online dating services, mobile apps and blogs
- Social news sites such as Reddit and Buzzfeed
- Video and photo sharing sites such as YouTube, Instagram, SnapChat, and Flickr
- Wikis, or shared encyclopedias such as Wikipedia
- An ever-emerging list of new web-based platforms generally regarded as social media or having many of the same functions as those listed above

Protected Class: Protected class is a term that describes characteristics or factors that cannot be targeted for discrimination and harassment, which include: race, color, creed, religion, national origin, sex, gender identity, sexual orientation, marital status, age, sexual orientation, status with regard to public assistance, disability, genetic information, veteran status or activity in a local Human Rights Commission or any other characteristic protected by law in all terms, conditions, and privileges of employment.

Responsibilities
Agents have the responsibility to use social media resources in an efficient, effective, ethical and lawful manner pursuant to all existing County and departmental policies. Stating, sharing or posting discriminatory comments that would have the effect of creating a hostile or abusive working environment based on a protected class status or that would impact the County's ability to serve the public in a non-discriminatory fashion is prohibited.

All individuals covered by this policy are expected to become familiar with it and comply with all of its provisions. Enforcement of this policy is a shared responsibility of all employees and agents.

New employees will receive a copy of this policy with their New Employee Orientation packet. Current employees will receive a copy of this policy via County-wide email. Supervisors will be asked to discuss the policy with their employees. Any violation of this policy may result in disciplinary action up to and including discharge.

Background

Social networking in government serves two primary functions: to communicate relevant and timely news, information and events and urgent notifications of critical incidents that may affect residents, business owners and visitors; and to engage, interact with and solicit feedback from community members. Information that is distributed via social networking must be accurate, consistent, and timely and meet the information needs of the County's customers. Since social media is used for social networking, this policy seeks to ensure proper use of the County's social media sites by its representatives.

St. Louis County strives to maintain a positive and informative social media presence. County representatives have the responsibility to use social media resources in an efficient, effective, ethical and lawful manner pursuant to all existing County and departmental policies. This policy also provides guidelines and standards for County representatives regarding the use of social media for communication with residents, colleagues and all other followers. Posting of any content on any social media platform managed by the County by any County agent constitutes acceptance of this policy.

Procedures

St. Louis County Social Media Use

Employees and other agents with administrator access are responsible for managing social media accounts. Facilities or departments wishing to have a new social media presence must initially submit a request to the County's Communications Manager in order to ensure social media accounts are kept to a sustainable number and policies are followed. All approved sites will be clearly marked as the St. Louis County site and will be linked with the official County website www.stlouiscountymn.gov. No one may establish social media accounts or websites on behalf of the County unless authorized in accord with this policy. It is preferred that third-party social media websites are not the only place in which the public can view St. Louis County information. Information posted to a third-party media website may also be provided in another publicly available format, such as the St. Louis County website if deemed appropriate.

Administration of all social media websites must comply with applicable laws, regulations, and policies as well as proper business etiquette. No employee or agent may administer any County social media account without express written approval from the Communications Manager or the County Administrator, and completion of any required training.

County social media accounts accessed and utilized during the course and scope of an employee's performance of his/her job duties may not be used for private or personal purposes or for the purpose of expressing private or personal views on personal, political or policy issues or to express personal views or concerns pertaining to County employment relations matters.

No social media website may be used by any County employee or agent to disclose not public data, including private data on individuals and confidential data on individuals. If there is any question as to whether information is not public data, contact Human Resources.

When using social media sites as a representative of the County, employees and agents will act in a professional manner. Examples include but are not limited to:

- Adhere to all County personnel and Computer Use policies
- Use only appropriate language and content
- Not post, provide or use not public data, including private data on individuals and confidential data on individuals, as part of any content added to a site
- Not negatively comment on community partners or their services, or do so as part of any content added to a site
- Not provide information related to pending decisions that would compromise collective bargaining
- Not post content including personal attacks, insults or threatening language
- Not post content which is subject to copyright, trademark right or other intellectual property right of any third party without the express written permission of the third party
- Be aware that content added to a site is subject to open records/right to know laws and discovery in legal matters or court cases
- Be mindful regarding the appropriateness of content
- Comply with any existing code of ethical behavior established by the County

Be aware that content will not only reflect on the writer, but also on St. Louis County as a whole, including elected officials and other County employees and agents. Make sure information is accurate and free of spelling and grammatical errors.

Social media forums which have a moderation of comments feature should be used over those that do not, whenever possible. Where moderation is available, comments from the public will be moderated by designated County staff with administrative rights before posting. Where moderation prior to posting is not an option, sites will be regularly monitored by designated staff with administrative rights.

St. Louis County staff with administrative rights will not edit any posted comments. However, comments posted by members of the public will be removed if they are not relevant to the topic of the post at issue or constitute obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, or child pornography (also known as child sexual abuse material).

Personal Social Media Use

St. Louis County respects employees' and agents' rights to post and maintain personal websites, blogs and social media platforms and to use and enjoy social media on their own personal devices during non-work hours. The County encourages employees and agents to exercise good judgement and common sense, and act in a prudent manner with regard to website and internet postings that reference St. Louis County, its employees, its agents, its operation or its property. Employees and agents and others affiliated with the County are not permitted to use a County brand, logo or other County identifiers on their personal sites, nor post information that purports to be the position of the County without prior authorization.

County employees and its agents are not permitted to use a county email address when registering, creating or posting on a social media account; nor identify themselves as County representatives when responding to or commenting on blogs with personal opinions or views. If an employee chooses to identify him or herself as a St. Louis County employee, and posts a statement on a matter related to County business, a disclaimer similar to the following must be used: "These are my own opinions and do not represent those of the County."

Personal use of social media websites during business hours should be limited to break and lunch periods, and employees and agents must adhere to the guidelines outlined in any and all County policies. Employees and agents should also be familiar with the Data Ownership section of this policy (outlined below).

There may be times when personal use of social media (even if it is off-duty or using the employee's own equipment) may impact the workplace and become the basis for employee coaching or discipline. Examples of situations where this might occur include, but are not limited to:

- Cyber-bullying, stalking or harassment
- Release of not public data, including private data on individuals and confidential data on individuals; if there are questions about what constitute not public data, contact Human Resources
- Unlawful activities
- Misuse of County-owned social media
- Inappropriate use of the County's name, logo or the employee's position or title
- Using County-owned equipment or County-time for extensive personal social media use
- Dating, romance or break-ups between co-workers

Each situation will be evaluated on a case-by-case basis because the laws in this area are complex. If you have any questions about what types of activities might result in discipline, please discuss the type of usage with the Human Resources Advisor assigned to your Department.

Data Ownership

All social media communications or messages composed, sent, or received on County equipment in an official capacity are the property of St. Louis County and will be subject to the Minnesota Government Data Practices Act ("MGDPA"). This law classifies certain information as available to the public upon request. St. Louis County also maintains the sole property rights to any image, video or audio captured while an employee or agent is representing the County in any capacity.

The County retains the right to monitor social media use by employees and agents on County equipment and will exercise its right as necessary. Users should have no expectation of privacy. Social media is not a secure means of communication. Any social media communications or messages composed, sent, accessed or received on County equipment for personal use may be subject to the MGDPA. Even if a matter is a public record, employees and agents may not repeat, disseminate, or share information that they learned in the course of their employment that they would otherwise have no reason to know. This applies to both County and personal social media communications.

Violations of the MGDPA may be prosecuted in accordance with Minnesota Statutes § 13.09 and can constitute just cause for termination of employment or other disciplinary or administrative sanction.

Policy Violations

Violations of the Policy may subject the employee or agent to disciplinary or administrative action up to and including discharge from employment.

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RESOLUTION NO. 16-651 *(Rescinded by Board Res. 24-487)*

RESOLUTION NO. 24-487

Revised October 1, 2024