

## Clerk Village of Pinckney

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**From:** David Stoker <dstoker@cstmlaw.com>  
**Sent:** Thursday, May 2, 2019 1:16 PM  
**To:** President Village of Pinckney  
**Cc:** Gwen Kamm; Clerk Village of Pinckney  
**Subject:** RE: Legal opinion on Facebook  
**Attachments:** Livingston County Social Media Policy.pdf; Livingston County Social Media User Guidelines.pdf; Ingham Co Policy 223 Use of Social Media.pdf; Dearborn Social Media Use Policy - dearborn.pdf; Dearborn Facebook Standard Policy.pdf; Dearborn Facebook Comments Policy.pdf; Dearborn Twitter Policy.pdf; Dearborn Youtube Policy.pdf; Lake Isabella Social Media Policy.pdf

Linda,

Yes, a policy is important, and there should also include a plan to monitor the website and the postings that appear on it on a regular basis and timely matter. I have attached the County's Social Media Policy and User Guidelines, as well as the Ingham County policy as a samples, both of which our office worked on. The Livingston webpage for its policies and to the links to the County various Facebook pages is at:

<https://www.livgov.com/communications>

MML also has a section on its website that reviews social media policies at:

[http://www.mml.org/resources/information/Social\\_Media.html](http://www.mml.org/resources/information/Social_Media.html)

From that page, the most detailed is the series of policies of the City of Dearborn, which are linked to at that MML website and I have attached, *(though perhaps more detailed than needed)*.

The shortest, if only a brief policy is desired, may be the Village Lake Isabella sample on the MML site, which I have also attached *(though it likely is not encompassing enough)*.

However, note that in each of these policies have someone specifically assigned to monitor the sites.

Some other resources include a good webpage on setting up a social media program from the New Jersey State League of Municipalities, with links to several useful topics:

<https://www.njlm.org/432/Social-Media-Resource-Center>

The National League of Cities also has a review of the process at:

<http://www.nlc.org/sites/default/files/RISC-2011-Social-Media-Policies.pdf>

A good quick article on what is often missed in these policies is at:

<https://www.govtech.com/gov-experience/4-Common-Mistakes-in-Government-Social-Media-Policies.html>

Let me know if there are questions or further assistance is needed.

David G. Stoker

Cohl, Stoker & Toskey, P.C.  
(517) 372-9000  
[dstoker@cstmlaw.com](mailto:dstoker@cstmlaw.com)

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**From:** President Village of Pinckney [mailto:President@villageofpinckney.org]  
**Sent:** Monday, April 29, 2019 8:47 AM  
**To:** David Stoker  
**Cc:** Gwen Kamm; Clerk Village of Pinckney  
**Subject:** Legal opinion on Facebook

Hi, Dave:

Council is requesting that I solicit a legal opinion on Facebook -- what sort of page the Village should have, what kinds of interaction and open posting it should allow. If you know of any "official" guidelines for hosting and posting, please share.

I'd like to share this with Council at the May 13 meeting.

Thanks,

Linda Lavey

## CITY OF DEARBORN FACEBOOK COMMENT POLICY



Welcome to the City of Dearborn, Michigan's Official Facebook page, which is maintained and monitored by staff members in the City's Department of Public Information.

We like comments and interaction from residents and visitors. After all, that's what social media is about, right? We will be courteous and professional in our postings and ask that you do the same. Reasonable arguments for opposing views are encouraged. The City is not responsible for settling disagreements between users, nor will a comment be removed solely at the request of a user. The City reserves the right to delete or censor comments with content that:

- contains a personal attack, insult, racial slur or any other derogatory term
- defames any person or organization
- is off-topic and unrelated to the original post
- uses foul language or is sexually explicit, including "masked" profanity
- promotes hate or discrimination of any kind
- is blatant spam, including advertising commercial services or products
- encourages illegal activity or violates any local, state or federal law
- contains private or personal information
- endorses candidates or a particular stance on an active ballot measure or specific legislation
- is reported as abuse
- contains random or unintelligible text
- compromises the safety or security of the public or public systems
- violates a legal ownership interest of any other party
- contains images, videos or links to sites that do not conform to these guidelines
- contains viruses or computer code

Repeated violations of the above comment policy may cause the author to be permanently blocked from the City of Dearborn's Facebook page.

We understand that social media is a 24/7 medium; however, our moderation capabilities are not. We may not see every inappropriate comment right away. We trust in the maturity of our community to ignore personal attacks and negative speech or respond politely. If a user posts a comment that requires a response, it will be answered within two business days between 8 a.m. and 5 p.m.

A posted comment (which could be in the form of text, image, video or hyperlink) is the personal opinion of the original author--not of the City of Dearborn--and publication of a comment does not imply endorsement or agreement by the City of Dearborn.

The City of Dearborn is not responsible for the content provided on "related," "promoted" or "sponsored" ads that are accessible from this Facebook page. All viewers should note that these related ads and comments expressed on them do not reflect the opinions and position of the City of Dearborn government, its officers or employees.

The City of Dearborn does not collect, maintain or otherwise use the personal information stored on any third party site in any way other than to communicate with users on that site. Users may remove themselves at any time from the City's "friends" or "fan" lists. Users should be aware that third party websites like Facebook have their own privacy policies and follow these policies accordingly.

**This comment policy may be revised at any time to ensure its continued use is consistent with its intended purpose as a limited forum.** If you have any questions or comments about this policy, please feel free to contact the City's Department of Public Information at 313-943-2285.

Revised April 18, 2013

# CITY OF DEARBORN FACEBOOK STANDARD



## Purpose

Facebook is a social networking site. Businesses and governments have joined individuals in using Facebook to promote activities, programs, projects and events. This standard is designed for City departments looking to drive traffic to department Web sites at CityofDearborn.org (including CampDearborn.com, DearbornLibrary.org, DearbornFordCenter.com, DearbornTheater.com, DearbornHills.com) and to inform more people about City activities and services. These standards should be used in conjunction with the City's social media use policy and social media "best practices" guidelines. As Facebook changes, these standards may be updated as needed.

## Establishing a page

When a department director determines that a City department has a business need for a Facebook account, he or she will submit a request to the director of public information and complete a social media worksheet. Once approved, the digital media coordinator will consult with the department director or his/her designee on how to set up its business page on Facebook.

## Content

1. Type of 'pages'
  - a. City departments will create 'pages' in Facebook not 'groups' or 'personal profiles' acting as pages. Facebook 'pages' offer distinct advantages including greater visibility, customization and measurability. Community pages will currently be accepted as is unless there is a copyright/trademark issue.
  - b. For 'type' description, choose 'government.'
2. Boilerplate
  - a. The City's digital media coordinator can assist with standardizing the department's Facebook page, including providing a timeline cover photo and the City's logo. All Facebook pages must display both a timeline cover photo and either City logo or department logo.
  - b. Departments will include a mission statement/introduction in the "About" section of the page as well as department details of interest to the public, such as business hours, street address, department phone number and/or email address. A City boilerplate sentence should follow the department/program description and be placed in the "Company Overview" section:

*[Insert department] is a department of the City of Dearborn, www.CityofDearborn.org. This page is for general public information only. Should you require a response from the City or wish to request City services, you must call [insert department name here] at [insert telephone number].*

*Please also be aware that, under certain circumstance, content appearing on this page may be subject to Michigan's public records laws and subject to disclosure by the City as required by law. This may include information about you that you make available through your privacy settings on this site on your own pages.*

If comments are turned on, the department Facebook page should include a link to the City's social media policies ([www.cityofdearborn.org/socialmediapolicies](http://www.cityofdearborn.org/socialmediapolicies)), including the full text of the City's Facebook Comment Policy, which page administrators will adhere to while moderating page comments.

3. Link to the City
  - a. A link to [www.CityofDearborn.org](http://www.CityofDearborn.org) will be included in the "Contact Info" section.
  - b. City department and project pages should be page favorites of other City Facebook pages.
4. Page naming
  - a. Page names should be descriptive of the department.
  - b. Departments will choose carefully with consideration for abbreviations, slang iterations, etc. For instance, "Dbn" is the widely accepted abbreviation for "Durban" on Twitter. Using the full word "Dearborn" is recommended when naming any page.
  - c. The director of public information will approve proposed names.
5. Page administrators
  - a. A successful page requires "babysitting." Each department Facebook page requires a main administrator who is responsible for monitoring the Facebook page on a daily basis and sustaining the page long term. Department will designate a back-up administrator in the primary administrator's absence.
  - b. The department's Facebook administrator is responsible for making sure content is not stale and that questions from page visitors are answered in a timely manner. Posting a new status update once per day is ideal. The minimum a page should be updated is once per week. Posts on behalf of the City should be approved by the department's Facebook administrator or a designated alternate.
  - c. Facebook administrators must work with the digital media coordinator on producing and sharing a monthly content calendar.
  - d. Page administrators managing City accounts are required to meet regularly with the digital media coordinator and other City social managers to discuss content ideas, best practices, policies, etc.
  - e. The digital media coordinator should be given administrative access to all Facebook pages.
6. Comments
  - a. Comments to a department's Facebook timeline generally will be allowed but may be turned off on a case-by-case basis with request from the department and approval from the director of public information.
  - b. Page administrators shall be responsive to constituents who communicate via Facebook's comment and personal message functions. Communication with constituents and fans will be timely and consistent

with existing protocols. Supplying a response within two business days is expected. A same-day reply is preferred when possible.

7. Style
  - a. City Facebook pages will be based on a template that includes consistent City branding. The Department of Public Information will advise departments on City branding elements. See the City's main Facebook account as an example.
  - b. Departments will use proper grammar, standard AP style and follow the City's own stylebook while avoiding jargon and abbreviations. Facebook is more casual than most other communication tools but still represents the City at all times.
8. Posts
  - a. Facebook pages should be refreshed with a new post at least once per day, with the minimum being once per week. Fan engagement should be used as a gauge for the timing and frequency of posts.
  - b. Departments should not automate Facebook updates. For example, a Twitter account should not be linked for the purpose of posting tweets automatically to a Facebook page. Updates can, however, be scheduled directly on Facebook, or using a tool such as Hootsuite.com.
  - c. Keep the content of your status updates relevant to your department. Some cross-promotion can occur, and may even be encouraged at times, related to other City departments on social networks. In general, be selective regarding which non-departmental updates are provided on a department page.
  - d. Departments are encouraged to be creative with status updates, utilizing images, videos, questions and 'games' whenever possible to add interest and keep 'fans' engaged.
9. Applications
  1. There are thousands of Facebook applications. Common applications can allow users to stream video and music, post photos, and view and subscribe to RSS feeds. While some may be useful to the page's mission, they can cause clutter and security risks.
  2. An application should not be used unless it serves a business purpose, adds to the user experience, comes from a trusted source and is approved by the director of public information.
  3. An application may be removed at any time if there is significant reason to think it is causing a security breach or spreading viruses.

**This social media use policy may be revised at any time.**

**Revised April 18, 2013**

# CITY OF DEARBORN SOCIAL MEDIA USE POLICY



## **Purpose**

To address the fast-changing landscape of the Internet and the way residents communicate and obtain information online, City of Dearborn departments may consider using social media tools to reach a broader audience. The City encourages the use of social media to further the goals of the City and the missions of its departments, where appropriate.

The City of Dearborn has an overriding interest and expectation in deciding what is "spoken" on behalf of the City on social media sites. This policy establishes guidelines for the use of social media.

## **Goals**

To strengthen the connection between City government and the community by providing timely, interesting, accurate and relevant information about living in, working in and visiting Dearborn including insight about Dearborn's government, neighborhoods, commerce, history and future.

The main function of any City social media account should be to ensure that current residents are aware of all the services available to them and that they are informed in a timely manner of any relevant news affecting their lives in Dearborn. Social media sites should also serve as a forum for facilitating positive discussion on city matters, events and services.

## **Approved social media platforms**

1. Facebook
2. Twitter
3. YouTube
4. Foursquare
5. Instagram

See related "standards" documentation for guidelines on acceptable uses of Facebook, Twitter, YouTube and Foursquare for City business.

Additional social media platforms may be proposed for use, and approved by the director of the Department of Public Information, if a department can demonstrate a solid strategy for utilizing a new platform in such a way that it would further the goals of the City and the mission of its department.

## **Local, state and federal laws**

City of Dearborn social media sites shall comply with all federal, state and local laws including but not limited to:

- First Amendment Freedom of Speech
- Freedom of Information Act
- Privacy Laws
- Public Record Laws
- Copyright laws

## **Administration and management of social media platforms**

1. Administration of City of Dearborn social media sites
  - a. The director of the Department of Public Information will maintain a list of social media platforms that are approved for use by City departments and staff.
  - b. All new social media tools proposed for City use will be approved by the director of the Department of Public Information.
  - c. The director of the Department of Public Information will maintain a master list of all official City of Dearborn social media sites.
  - d. Departments wishing to create and use a social media account for City business must submit a request to, and receive approval from, the director of public information.
  - e. A department will have only one account on each of the social networks, unless otherwise approved by the director of public information.
  - f. Departments must register account information, including usernames and passwords, with the director of the Department of Public Information. City departments also are advised to connect their accounts to the City of Dearborn's main social media dashboard for crisis communication purposes.
  - g. Departments will inform the director of public information of any account or administrative changes to existing department social media sites, including termination of an account.
2. Administration of department social media sites
  - a. As is the case for City websites, departmental staff will be responsible for the content and upkeep of any social media sites their department may get approval to create. Department directors must designate an employee to administrator its social media account/s and submit the employee's name to the director of public information.
  - b. The Department of Public Information must also have administrative access to all City social media sites. Department

- staff should provide a list of login names and passwords, as well as make a designee from DPI into an administrator on any City Facebook pages
- c. City employees serving as social media managers will be provided with, and must adhere to, the City's social media use policy, the City's standards for each social network he/she will be managing, the City's social media "best practices" guidelines, the City's social media guidelines for City of Dearborn employees and the City of Dearborn stylebook.
3. All City of Dearborn social media sites shall comply with all appropriate City of Dearborn policies and standards, including but not limited to:
    - a. Email policy
    - b. Internet Use Policy
    - c. Facebook Standard
    - d. Twitter Standard
    - e. YouTube Standard
    - f. Foursquare Standard
    - g. Social Media "Best Practices" Guidelines
    - h. Social Media Guidelines for City of Dearborn employees
    - i. City of Dearborn Stylebook
  4. For each social media tool approved for use by the City the following documentation will be developed and adopted:
    - a. Operational and use "best practice" guidelines
    - b. Standards and processes for managing accounts on social media sites

## **Guidelines on acceptable use**

### General

The City of Dearborn's websites (CityofDearborn.org, CampDearborn.com, DearbornLibrary.org, DearbornFordCenter.com, DearbornTheater.com, DearbornHills.com) will remain the City's primary and predominant internet presences.

The best, most appropriate City of Dearborn uses of social media tools fall generally into two categories:

- As channels for disseminating time-sensitive information as quickly as possible (example: emergency information).
- As marketing/promotional channels that increase the City's ability to broadcast its messages to the widest possible audience.

Wherever possible, content posted to City of Dearborn social media sites will also be available on the City's main websites.

Wherever possible, content posted to City of Dearborn social media sites should contain links directing users back to the City's official websites for in-depth information, forms, documents or online services necessary to conduct business with the City of Dearborn.

The City will approach the use of social media tools as consistently as possible, enterprise wide.

### User comments

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 City departments and members of the public. City of Dearborn social media articles and comments containing any of the following forms of content shall not be allowed:

- contains a personal attack, insult, racial slur or any other derogatory term
- defames any person or organization
- is off-topic and unrelated to the original post
- uses foul language or is sexually explicit, including “masked” profanity
- promotes hate or discrimination of any kind
- is blatant spam, including advertising commercial services or products
- encourages illegal activity or violates any local, state or federal law
- contains private or personal information
- endorses candidates or a particular stance on an active ballot measure or specific legislation
- is reported as abuse
- contains random or unintelligible text
- compromises the safety or security of the public or public systems
- violates a legal ownership interest of any other party
- contains images, videos or links to sites that do not conform to these guidelines
- contains viruses or computer code

The above guidelines must be displayed to users or made available by hyperlink. Any content removed based on these guidelines must be retained, including the time, date and identity of the poster when available (see the City of Dearborn Facebook, Twitter, YouTube and Foursquare standards).

The City reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law.

### Corrections

Erroneous information needs to be corrected as quickly and transparently as possible. Serious errors need to be brought to the attention of your department director or the director of public information.

#### Deleting content or comments

If it is determined that content previously posted by a City social media manager should be deleted, consult with your department director or director of public information. If a decision is made to delete previously posted content, it is best to explain to constituents why you are deleting the content.

City social media managers may not delete comment postings simply because they may be critical of the City or City officials. If user content is positive or negative and in context to the conversation, then the content should be allowed to remain, regardless of whether it is favorable or unfavorable to the City. If the content is ugly, offensive, denigrating and/or completely out of context, then the content should be rejected and removed according to the City's official comment policy for that specific social platform.

Content submitted for posting that is deemed not suitable by a City social media manager shall be retained pursuant to the records retention schedule along with a description of the reason the specific content is deemed not suitable for posting.

**This social media policy may be revised at any time.**

Revised April 18, 2013

# CITY OF DEARBORN TWITTER STANDARD



## Purpose

Twitter is a micro blogging tool that allows account holders to tweet up to 140 characters of information to followers. By maintaining a Twitter account, City departments can communicate information directly to their customers, alerting them to news and directing them to [CityofDearborn.org](http://CityofDearborn.org) (including [CampDearborn.com](http://CampDearborn.com), [DearbornLibrary.org](http://DearbornLibrary.org), [DearbornFordCenter.com](http://DearbornFordCenter.com), [DearbornTheater.com](http://DearbornTheater.com), [DearbornHills.com](http://DearbornHills.com)) for more information. These standards should be used in conjunction with the City's social media use policy and social media "best practices" guidelines.

## Establishing an account

When a department determines it has a business need for a Twitter account, it will submit a request to the director of public information and complete a social media worksheet. Once approved, the digital media coordinator will consult with the department on how to set up its business account on Twitter.

## Content

1. Boilerplate
  - a. Twitter accounts shall serve three primary purposes:
    - i. Get emergency information out quickly
    - ii. Promote City-sponsored events, activities, programs and projects
    - iii. Refer followers to content hosted at [www.CityofDearborn.org](http://www.CityofDearborn.org)
  - b. The City's digital media coordinator can assist with standardizing a department's Twitter account and provide the City's logo or other images appropriate for the account. All imaging, including Twitter backgrounds, must meet city branding standards and be approved by the Department of Public Information.
  - c. Account names should be descriptive of the department and begin with "Dearborn" (DearbornPD, DearbornFire, etc) except in the rarest of cases. Departments will choose carefully with consideration for abbreviations, slang iterations, etc. The director of public information will approve proposed names.
  - d. Twitter bios will include department name and phone number or email address. If appropriate the following will be added: Tweets monitored 8 a.m to 5 p.m. Mon-Fri.
2. Link to the City
  - a. A link to [www.CityofDearborn.org](http://www.CityofDearborn.org) will be included in the profile area of a department Twitter account, unless the department manages an external website (like [CampDearborn.com](http://CampDearborn.com), [DearbornLibrary.org](http://DearbornLibrary.org), [DearbornFordCenter.com](http://DearbornFordCenter.com), [DearbornTheater.com](http://DearbornTheater.com), [DearbornHills.com](http://DearbornHills.com)).
  - b. Department accounts should follow other City accounts on Twitter.
3. Account administrators

- a. A successful Twitter account requires "babysitting." Each department Twitter requires a main administrator who is responsible for monitoring the Twitter account on a daily basis and sustaining it long term. Department will designate a back-up administrator in the primary administrator's absence.
  - b. Department's Twitter administrator is responsible for making sure account is not stale. Tweeting at least once per day is encouraged, with 3-5 tweets per day an ideal. Tweets on behalf of the City should be approved by the department's Twitter administrator or a designated alternate.
  - c. Twitter administrators shall be responsive to constituents who communicate via Twitter's @reply or direct message functions. Communication with followers will be timely and consistent with existing protocols. Supplying a response within two business days is expected. A same-day reply is preferred when possible.
  - d. Twitter administrators must work with the digital media coordinator on producing and sharing a monthly content calendar.
  - e. Administrators managing City Twitter accounts are required to meet regularly with the digital media coordinator and other City social managers to discuss content ideas, best practices, policies, etc.
  - f. The Department of Public Information must have administrative access to the account, including login name and password. If the password is changed, DPI must be notified immediately.
4. Style
- a. City Twitter accounts will be consistent with City branding. The Department of Public Information will advise departments on City branding elements. See the City's main Twitter account as an example.
  - b. Departments will use proper grammar, standard AP style and follow the City's own style guide while avoiding jargon and abbreviations as much as possible. Twitter is a casual communication tool but still represents the City at all times.
5. Tweets
- a. Twitter accounts should be refreshed with a new tweet at least once per day, with the minimum being one tweet three times per week.
  - b. Twitter is a fast-paced communication tool with an ideal output ranging from 3-5 tweets per day. Tweets should be timed so they are published throughout the day, not in clusters of mere minutes. The goal is to tweet no more than once per hour.
  - c. Departments should not automate Twitter updates. For example, a Twitter account should not be linked for the purpose of posting tweets automatically to a Facebook page. Tweets can, however, be scheduled using a tool such as Hootsuite.com.
  - d. Keep the content of your tweets relevant, timely and informative according to your department. Some cross-promotion can and should occur related to other City departments as appropriate.
  - e. Twitter content shall mirror information presented on [www.CityofDearbon.org](http://www.CityofDearbon.org) and other existing information dissemination mechanisms. Twitter administrators shall ensure that information is posted correctly the first time. Twitter does not allow for content editing.

- f. Departments are encouraged to be creative with tweets, utilizing images, videos, questions and 'games' whenever possible to add interest and keep 'followers' engaged.
- 6. Retweeting, favoriting and responding
  - a. Twitter administrators are welcome to retweet and share material posted by official City-branded accounts (@cityofdearborn, @DearbornRec, @DearbornLibrary, @DearbornTV). Positive tweets from non-city accounts may also be retweeted, though discretion is urged.
  - b. Twitter administrators should always respond to tweets or direct messages containing questions, and are encouraged to engage with users
  - c. Administrators may choose to "favorite" tweets containing positive messages about City programs, events and services

**Revised April 18, 2013**

## **CITY OF DEARBORN**

### **YouTube.com Policy**

**Revised April 18, 2013**

Welcome to the City of Dearborn, Michigan's Official YouTube Channel, which is maintained and monitored by staff members in the City's Department of Public Information.

We like comments and interaction from residents and visitors. After all, that's what social media is about, right? We will be courteous and professional in our postings and ask that you do the same. Reasonable arguments for opposing views are encouraged. The City is not responsible for settling disagreements between users, nor will a comment be removed solely at the request of a user. The City reserves the right to delete or censor comments with content that:

- contains a personal attack, insult, racial slur or any other derogatory term
- defames any person or organization
- is off-topic and unrelated to the original post
- uses foul language or is sexually explicit, including "masked" profanity
- promotes hate or discrimination of any kind
- is blatant spam, including advertising commercial services or products
- encourages illegal activity or violates any local, state or federal law
- contains private or personal information
- endorses candidates or a particular stance on an active ballot measure or specific legislation
- is reported as abuse
- contains random or unintelligible text
- compromises the safety or security of the public or public systems
- violates a legal ownership interest of any other party
- contains images, videos or links to sites that do not conform to these guidelines
- contains viruses or computer code

Repeated violations of the above comment policy may cause the author to be permanently blocked from the City of Dearborn's YouTube Channel.

We understand that social media is a 24/7 medium; however, our moderation capabilities are not. We may not see every inappropriate comment right away. We trust in the maturity of our community to ignore personal attacks and negative speech or respond politely. If a user posts a comment that requires a response, it will be answered within two business days.

A posted comment (which could be in the form of text, image, video or hyperlink) is the personal opinion of the original author--not of the City of Dearborn--and publication of a comment does not imply endorsement or agreement by the City of Dearborn. By posting any comments, the user agrees to indemnify the City of Dearborn from and against all liabilities; damages and costs incurred which arise out of or are related to the posted content.

The City of Dearborn is not responsible for the content provided on "related," "promoted" or "response" videos that are accessible from this YouTube channel. All viewers should note that these related videos and comments expressed on them do not reflect the opinions and position of the City of Dearborn government, its officers or employees.

The City of Dearborn does not collect, maintain or otherwise use the personal information stored on any third party site in any way other than to communicate with users on that site. Users may remove themselves at any time from the City's "friends" or "fan" lists. Users should be aware that third party websites like YouTube have their own privacy policies and follow these policies accordingly.

This comment policy may be revised at any time to ensure its continued use is consistent with its intended purpose as a limited forum. If you have any questions or comments about this policy, please feel free to contact the City's Department of Public Information at 313-943-2285.

####

**Approved: March 27, 2018  
Resolution No. 18-122**

A. Purpose.

Ingham County is committed to ensuring that Internet conduct of its departments comports with all applicable laws and does not damage our reputation and business interests. The County has a legitimate business interest in monitoring internet activity, regardless of where or when it occurs. Specific concerns include activity that could violate an individual's privacy, or otherwise adversely affect an individual or vendor we interact with, our reputation, the reputation of others, the trust others place in us, or our working relationship with other organizations.

Ingham County is required under the Health Information Portability and Accountability Act of 1996 (HIPAA) to ensure that any protected health information (PHI) that we create, receive, use, or store is not improperly used or disclosed through any means, including electronic. Ingham County also has a fundamental interest in protecting confidential and proprietary information about the organization as well as our reputation.

The intent of this policy is not to restrict the flow of useful and appropriate information but to minimize the risks, legal and otherwise, to Ingham County and its employees for improper activity and disclosures. The intent of this policy is to help avoid claims against Ingham County or its personnel for issues like HIPAA violations, invasion of privacy, breach of confidentiality, and defamation or slander. This policy is also intended to provide guidelines for maintaining a respectable and ethical work environment and to ensure that County departments are acting in a manner consistent with our mission.

This policy is not intended or designed to prohibit the lawful exercise of employees' rights under applicable federal or state law, including constitutionally protected free speech, whistleblowers reports, or the ability of employees to engage in certain "protected concerted activity" under the Michigan Public Employment Relations Act. This policy will not be applied in any way that might limit such applicable legal rights of Ingham County personnel.

B. Applicability.

This policy is generally applicable to all employees and departments of Ingham County. Portions of this policy are specifically applicable to those employees entrusted with representing Ingham County on Social Media. These provisions shall not apply to social

media activities that involve criminal investigation or prosecution activities undertaken by the Sheriff's Office, Prosecuting Attorney's Office or the Courts.

C. Definitions.

1. **Account Manager:** Employee who has been authorized to post Social Media content on behalf of an Ingham County department, including but not limited to Public Information Officers, communications managers, and program leads. This individual needs to file a signed copy of this policy with the Social Media Specialist.
2. **Alternate Account Manager:** Employee who has been authorized to post Social Media content on behalf on an Ingham County department when the Account Manager is unable, no longer an Ingham County employee, or on leave from the County. This individual needs to file a signed copy of this policy with the Social Media Specialist.
3. **Brand Standards:** Refers to the graphic standards and guidelines that govern the use of the Ingham County logo, nameplate, color scheme, and visual identity.
4. **Departments:** Offices and agencies that utilize County-owned computer equipment.
5. **Innovation and Technology (IT) Department:** The department responsible for information management and governance, system maintenance, and security policies.
6. **Mobile Apps:** Technologies that can be downloaded to smartphones and tablets and accessed on the go; provides publishing abilities to account manager who work at a County worksite or offsite.
7. **Social Media:** Websites and applications that enable users to create and share content or to participate in social networking. These include, but are not limited to: Facebook, Instagram, YouTube, Snapchat, Twitter, Reddit, and LinkedIn.
8. **Social Media Action Plan (SMAP):** Official document departments are required to complete before creating new Social Media pages; answers key questions related to the use of Social Media, including target audience, goals, and resources.
9. **Social Media Specialist:** Designated employee(s) from Ingham County responsible for Social Media governance and policy compliance.
10. **Vendor:** Refers to a person or business that provides services under terms specified in a contract.

D. Roles and Responsibilities.

1. The IT department will:
  - a. Maintain a list of approved Social Media applications that departments may utilize.
  - b. Keep repository of and share Board approved standards that are representative of Ingham County's goals and initiatives.
  - c. Evaluate and approve SMAPs.
  - d. Be able to edit or remove inappropriate content from a department's Social Media page as directed by this policy, the Controller/Administrator, the Board, and/or other authority.
  - e. Conduct periodic tests and review of all department Social Media pages to ensure all account logins and passwords are up to date.
  - f. Setup Social Media accounts and settings for departments prior to use by a department.
  - g. Review new types of Social Media for effectiveness, efficiencies, and security.
  - h. Manage the program for documenting account managers, account logins, and passwords for the purpose of emergency management.
  - i. Consider record retention and public record requirements whenever implementing Social Media.
  
2. Departments will:
  - a. Oversee and manage Social Media pages for their department.
  - b. Designate and train account managers in proper use of Social media as defined in this policy.
  - c. Monitor the access levels of vendors working with the department on Social Media.
  - d. Provide the IT department with up-to-date lists of Social Media pages, account logins, and passwords for the purpose of emergency management.
  - e. Change Social Media passwords every ninety (90) days or immediately if account manager(s) are removed as administrators or leave Ingham County employment.
  - f. Manage record retention of Social Media in conformity with Ingham County and State of Michigan recordkeeping requirements.
  - g. Provide IT with a SMAP for each Social Media application it wishes to utilize.
  - h. Designate an Account Manager and an Alternate Account Manager to be the primary and the back-up manager of all department Social Media pages.

- i. Perform annual assessments and reviews of the department SMAP and, if necessary, make the appropriate changes.
  - j. Use only County email addresses for official County Social Media pages.
3. Account Managers and Alternate Account Managers will:
- a. Uphold brand standards and values when representing a department on Social Media.
  - b. Manage Social Media in accordance with the Ingham County Policies and Procedures.
  - c. Work with the IT department to employ best practices for Social Media use.
  - d. Monitor and measure Social Media, analyzing effectiveness and making recommendations to the department for continuous improvement.
  - e. Respond to questions and inquiries within 24 business hours and flag concerns when appropriate.
  - f. If an Account Manager cannot answer a question or inquiry, the Account Manager will direct the constituent to the correct department.
  - g. Read and agree with the terms set forth in this policy. A signed copy needs to be filed by the IT department.

E. Implementation.

1. Ingham County departments that use Social Media shall have a communications strategy that aligns with Ingham County Policies and Procedures. The IT department will provide guidance for departments.
2. Departments must complete a SMAP that identifies all of the following criteria:
  - a. Overall vision (*aspiration of a future state*) for Social Media strategy
  - b. Why a specific Social Media application is the right fit
  - c. Goals (*with specified outcomes*)
  - d. Objectives (*specific steps that will be taken to meet goals*)
  - e. Target audiences
  - f. Customer Service plan – Detail customer service expectations and develop plan to ensure consistency.
  - g. Resources and staff time needed
  - h. Marketing and public outreach
  - i. Last annual review
  - j. Department Head approval
  - k. Identity of an Account Manager
  - l. Identity of an Alternate Account Manager
  - m. What corrective action(s) will be taken upon discovery of an accidental, incorrect, or inappropriate post

3. Departments that already have Social Media accounts and pages must submit a SMAP within ninety (90) days of the approval of this policy by the Board of Commissioners.
4. Once the SMAP is completed, the IT department will evaluate requests for Social Media, and verify account managers.
5. If a department wishes to work with a vendor, agency, partner, stakeholder, and/or other government entity to promote services and engage in public outreach, the department must submit a Resolution for approval to the Board of Commissioners. Authorization forms are not to be used. Only County employees or registered vendors may manage Social Media pages on behalf of Ingham County departments due to security and compliance concerns.

F. Social Media Use.

1. Professional Use
  - a. Only Account Managers may post content to Social Media pages on behalf of a department.
  - b. Account Managers shall not disclose confidential or proprietary information acquired by way of your official position with the County. This restriction applies whether the information is disclosed on professional or personal Social Media accounts, or by any other method.
  - c. Employees shall not use personal Social Media accounts for work purposes. This prohibition is necessary to facilitate compliance with public records laws and protect information on personal accounts from public disclosure. Employees shall direct such activity to work accounts.
  - d. Employees should not work on Social Media after hours without prior approval. This is considered overtime and failure to obtain prior authorization may be cause for corrective action.
2. Personal Use
  - a. Employees may access personal Social Media accounts at work for limited personal communications as long as it does not interfere with work tasks. Please refer to Ingham County's Use of County Resources policy.
  - b. Employees shall not use a County email address when using Social Media accounts in a personal capacity.
  - c. Employees shall not release confidential information including but not limited to employee information, policies, labor relations, court rulings, investigations, or financial information on any personal media account.
  - d. While using County resources, employees shall not engage in any activity not in compliance with federal, state or local laws or Ingham Policies and Procedures.

G. Engaging with the Public.

1. Social media posts made on behalf of Ingham County shall not include any form of profanity, obscenity, or threatening language. Social Media posts shall not violate copyright or trademark restrictions.

It is not appropriate to engage in arguments with members of the public who may be critical of your department. Comments or posts on Social Media sites can typically be seen by anyone and usually cannot be deleted.

Departments shall have an approved procedure to address offensive remarks on Social Media accounts to be included in their SMAP. Questions regarding the content of a comment or post, shall be directed to a manager, department head, or IT.

2. Social Media pages managed by Ingham County departments shall include a terms of use statement, such as, “Ingham County reserves the right to remove posts that include threatening language and those which violate a copyright, trademark, or the Terms of Service of this Social Media site.”
3. Ingham County welcomes dialogue with the public, however comments are subject to public disclosure laws and comments that violate the following will be taken down:
  - a. Potentially libelous comments
  - b. Obscene or explicit language
  - c. Hateful or mean-spirited comments
  - d. Personal attacks, insults, or threatening language
  - e. Plagiarized material or material that violates intellectual property rights
  - f. Private or personal information published without consent
  - g. Commercial promotions or spam
  - h. Comments that are off topic or that link to material that is off topic
  - i. Comments that embed images from external sources

H. Public Records.

1. Content published on Social Media pages that relates to the conduct of government actions shall be retained and managed by departments in compliance with Ingham County records retention and State of Michigan recordkeeping requirements. Departments should set all privacy setting on Social Media pages to public.

Social Media pages shall include a statement illustrating that all content may be subject to public disclosure.

2. Each comment, post, photo, and list of individuals connected to a Social Media networking site under Ingham County control shall be considered as an open record. Social Media accounts used for County business, including personal accounts may be subject to the Freedom of Information Act (MCL 15.231 *et seq.*), even if the work was done on personal time and equipment.

I. Security.

1. Departments must practice appropriate password management. Passwords should always be kept private but Account Managers should also practice the following when considering Social Media passwords:
  - a. Passwords must change every ninety (90) days and immediately after the password or Social Media site accessed has been, or is suspected of being, compromised. Passwords must also change immediately if Account Managers are removed as administrators or leave county employment.
  - b. Once a password has changed, it is the duty of the Account Manager to immediately report it to IT.
  - c. Do not use automated login options on Social Media pages such as the “Keep me logged in” feature. This is to prevent unauthorized access to County Social Media pages should a computer or digital device be compromised or stolen.
  - d. Do not use a third-party program such as Last Pass to remember Ingham County Social Media passwords. Passwords shall always be available to the Account Manager, Alternative Account Manager, and IT.
  - e. IT shall be contacted if additional security guidance is needed.

J. Social Media Tools.

1. Applications such as HootSuite, which is a desktop application that allows users to manage Social Media accounts such as Facebook, Twitter, and LinkedIn all in one place, called a dashboard, shall not combine professional and personal Social Media pages. This helps prevent accidental posting of personal information from official County Social Media pages.

Employees who use desktop applications such as HootSuite to manage County Social Media pages, shall use an Ingham County email address and a password unique to the application.

2. Account Managers should use different mobile apps for professional and personal use of Social Media.

K. Disciplinary Action.

Employees found to have violated this policy may be subject to disciplinary action up to and including dismissal from employment pursuant to the County's Policies and Procedures and applicable collective bargaining agreements, and, if applicable, may be subject to prosecution under federal or state laws.

# Village of Lake Isabella

## Social Media & Website Policy

As a means of increasing communication with the residents it serves, the Village of Lake Isabella maintains two social media outlets. The first is a community blog maintained by the Village Manager. The second is the Village's official Facebook page.

### SECTION 1: FACEBOOK

#### I. Village Employee Conduct

The lines between public and private, personal and professional are blurred in online social networks. By virtue of identifying oneself as an employee of the Village of Lake Isabella online the employee carries an obligation to conduct his/her self in a professional and civil manner. To that extent employees should use disclaimers on personal sites that reflect the content contained therein is in no relation to their professional duties as an employee of the Village of Lake Isabella.

#### II. User Conduct

1. This code of conduct shall apply to all users of the Village's Facebook page, including Village staff, Village Council members, and members of Village Boards and Committees.
2. Comments are the opinion of the poster only, and publication of a comment does not imply endorsement or agreement by the Village of Lake Isabella.
3. Comments shall relate to the topic being discussed in the original post, and should be intended to further a civil discussion.
4. Comments shall not contain profanity, racial slurs, or other derogatory terms.
5. Comments shall not encourage illegal activity.
6. Comments shall not violate a legal ownership interest, such as a copyright or trademark.
7. Comments shall not contain personal or defamatory attacks.
8. Comments shall not contain random or unintelligible text.
9. Comments shall not endorse candidates seeking office, or advocate a stance regarding a ballot proposal.
10. Comments shall not advertise commercial products or services
11. Comments shall not direct users to other websites or Facebook pages.
12. There is no right to privacy on the Village's Facebook page as the page is a public forum.
13. The Village reserves the right to block or remove any comments that violate this policy, or are illegal, threatening, or contain defamatory comments.

14. Comments may be retained by the Village of Lake Isabella, and may be subject to requests under the Freedom of Information Act.
15. Anonymous postings, or multiple postings by the same user or individual using a fictitious or different name is not permitted.
16. The Village reserves the right to ban users that continually violate this code of conduct.
17. The Village Manager or his /her designee is hereby empowered to the moderator of all comments and posts to the Village's Facebook page.

## **SECTION 2: VILLAGE BLOG**

### **I. Content & Posting**

1. The Village Manager may elect to keep and update a blog highlighting the Village of Lake Isabella. The intent of this blog is promote the Village and also provide information in a more detailed form to residents of the community.
2. The content of said blog is to be informative and may include links to relevant sites and documents.
3. Comments shall adhere to the same standards as those listed for the Village's Facebook page.

## **SECTION 3: VILLAGE WEBSITE**

### **I. Content**

1. The Village Manager shall have the sole authority to administer the content of the Village's website unless specifically directed to modify the website per a majority of the Village Council.
2. The Village's website shall not link to candidate sites, sites advocating a position on a ballot proposal, or the personal blogs, social media sites, or homepages of staff, Council members, or board/commission members.
3. Approved meeting minutes are to be posted within 1 week of the date of their approval.
4. Public Hearing notices are to be posted as they become available.

## **SECTION 4: RESPONDING TO COMMENTS**

When responding to comments on either the Village's blog or Facebook page, the moderator is directed to process comments per the "Post Response Flowchart" provided by DePaul University, which is attached.



# Livingston County Social Media Policy

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## 1. Purpose:

Livingston County supports the use of social media technology to enhance communication, collaboration, and information exchange to further the goals of the County where appropriate. This document establishes County-wide social media use policies and procedures. This policy may evolve as new technologies and social media sites change.

## 2. Applicability

This policy is applicable to all Livingston County employees, including contract employees, volunteers, service providers, interns, students, and contractors performing business on behalf of Livingston County (collectively referred to as “users”).

## 3. Responsibilities

**3.1** The Livingston County Social Media Policy was approved by the Livingston County Board of Commissioners on August 17, 2015.

### 3.2 The Chief Information Officer or Technology Committee will:

- Evaluate and approve all new Social Media Action Plans with input from the Communication Specialist.
- Have final authority to edit or remove official social media sites and any content therein.

### 3.3 The Communication Specialist will:

- Maintain a list of approved social media networks and sites for official use.
- Evaluate all new Social Media Action Plans.
- Work directly with departments to coordinate social media strategies.
- Provide training to departments on best practices and implementation on an ongoing basis.
- Maintain a log file of social media networks, passwords, registered email addresses, date established, and a list of authorized site users for the purpose of emergency management.
- Ensure all social media sites have the correct security settings according to each social media network’s guidelines found in the Livingston County Social Media Handbook.
- Ensure all social media sites are kept current.
- Create standards for measuring effectiveness of social media, working with departments to establish reporting techniques and measures of success.
- Stay current with social media networks and functionality.

### 3.4 Department Directors will:

- Determine and establish a Social Media Action Plan for each social media account requested.

- Designate and oversee a departmental Social Media Coordinator and a back-up Social Media Coordinator.

### **3.5 Social Media Coordinators will:**

- Ensure the department's social media sites are regularly maintained and kept current.
- Ensure content posted to the department's official social media sites is appropriate, professional, and consistent with the County's policies.
- Work with the Communication Specialist to employ best practices for the department's social media use.
- Keep the Department Director informed of the department's social media sites and activities.

## **4. Procedures**

### **4.1 County Social Media Technology Use**

County and department use of social media technology shall conform to the policies, protocols, and procedures contained, or referenced, herein.

1. Comply with all applicable Federal and state laws, ordinances, regulations, and county policies. This includes, but may not be limited to laws and county policies regarding personally identifiable information, personally identifiable health information, copyright, records retention, First Amendment, Health Insurance Portability and Accountability Act (HIPAA), Hatch Act of 1939, The Privacy Act, privacy laws, fair use and financial disclosure laws, employment related laws, and county Workforce and Information Technology policies.
2. Be familiar and carry-out social media activity in accordance with the Livingston County Social Media Handbook.

### **4.2 Requirements for Departmental Social Media Use**

Departments who choose to utilize social media shall:

1. Complete a Social Media Action Plan for each requested social media account that identifies the department's mission, goals, objectives, audiences, and measures of success. The Social Media Action Plan shall be submitted to the Communication Specialist, Chief Information Officer, and Technology Committee for review and approval.
2. Designate a Social Media Coordinator and back-up Social Media Coordinator responsible for overseeing the department's social media activities, policy compliance, and responding to comments completely, accurately and in a timely manner.

3. Ensure that the department's social media sites are monitored daily. If the department's Social Media Coordinator is unable to monitor the site, the back-up Social Media Coordinator will be responsible for monitoring the site and responding to comments.
4. Department Directors shall designate appropriate usage levels including identifying what social media accounts individuals are approved to use, as well as defining roles.
5. Individuals approved for site use and defined roles shall be entered on the Social Media Action Plan.

#### **4.3 Authorized Use**

Livingston County respects the right of any employee to engage in online social networking using the Internet, other technology, and social media networks during their personal time. This includes instant messages, text, video, photos, and audio. While we respect the employee's right of self-expression, in order to protect the County's interests and ensure employees focus on their job duties, employees must adhere to the following guidelines.

1. Non-exempt Employees may not engage in such activities during work time or at any time with County equipment or property without Director's approval. See the Livingston County Information Technology Resources Policy.
2. Information published on social media networks that has to do with any aspect of work must comply with the all confidentiality requirements, HIPAA, and Livingston County Policies (e.g. the policy prohibiting harassment and discrimination). Information related to persons receiving services from the County must not be disclosed. The privacy rights of fellow employees must be respected.
3. Employees may not "friend" or "follow" an individual currently receiving service from Livingston County. This also applies to the individuals' caregivers and guardians. See department guidelines.
4. Livingston County departments or employees may not create a social networking site or service to conduct County business without a Social Media Action Plan and approval from the Chief Information Officer.
5. If the employee mentions the County while engaging in social networking and also expresses a view or opinion regarding the County's actions, the person must specifically note that the statement is his/her personal view or opinion and not the view or opinion of the County. This standard disclaimer does not by itself exempt program supervisors, managers, coordinators, and the leadership team from a

special responsibility when using social networks. See department guidelines.

6. By virtue of your position as a Livingston County employee, you are held to a higher standard than general members of the public, and your online activities should reflect such professional expectations and standards.
7. Users must immediately report violations of this policy to their program manager or supervisor, as well as to the Human Resources Director.
8. All program managers and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination from employment, professional discipline, or criminal prosecution, in accordance with Livingston County's Personnel Policies, Discrimination and Hostile Workplace Policies, Confidentiality Polices, and Information Technology Resources Policy.

#### **4.4 Approved Social Media Networks**

Departments shall only utilize County approved social media networks for hosting official County social media sites.

1. Social Media Action Plans will be reviewed by the Communication Specialist and approved by the Chief Information Officer and Technology Committee prior to public release.
2. Social media sites that are created without approval from the Chief Information Officer and Technology Committee will be in violation of this policy. Employees who violate this policy are subject to discipline up to and including termination from employment, professional discipline, or criminal prosecution, in accordance with Livingston County's Personnel Policies, Discrimination and Hostile Workplace Policies, Confidentiality Polices, and Information Technology Resources Policy.
3. For each approved social media network, usage guidelines will be developed to optimize County use of the network and will be available in the Livingston County Social Media Handbook.
4. The Communication Specialist is responsible for the creation of Livingston County's social media sites under the review of the Chief Information Officer and Technology Committee.
  - A. Social media sites will be created using official County email accounts.

- B. Passwords will be created and maintained by the Communication Specialist and will conform to password requirements. Passwords shall be promptly reset when authorized access is removed.
  - C. Department Directors shall notify the Communication Specialist immediately in the case of termination for any employee with authorized use of social media.
  - D. The Communication Specialist will maintain a log file of social media networks, passwords, registered email addresses, date established, and a list of authorized site users.
5. The Chief Information Officer and Technology Committee have the final authority to deactivate a social media site.
  6. Departments that establish a social media site will be required to use Hootsuite to manage the site's activity.
    - A. A department will use one Hootsuite account that is shared amongst the Social Media Coordinators and Department Head.
    - B. Departments will be charged back for their monthly Hootsuite fee.

#### **4.5 Authenticity Establishment**

Livingston County's social media sites shall be created and maintained with identifiable characteristics of an official County site.

1. All social media sites shall be created using an official Livingston County email account.
2. All social media sites shall display elements identifying them as an official County site. This includes displaying the statement, "Official site of Livingston County," the Livingston County logo, the departmental logo, official County contact information, and a link to the department's website.
3. All social media sites shall display a link to the Livingston County Social Media Policy and Social Media User Guidelines.

#### **4.6 Site Content**

Departments are responsible for establishing and maintaining content posted to their social media sites.

1. Social media content shall fully comply with all of the Livingston County Human Resources policies and the IT Resource Policy.
2. County social media sites shall be monitored regularly and prompt corrective action shall be taken when an issue arises that places, or has the potential to place the County at risk. Social Media

Coordinators shall review site activity and content daily for comments and misuse.

3. Content posted to all social media sites may be considered public records subject to disclosure and shall not disclose confidential or proprietary information.
4. All social media sites shall provide a link to the Livingston County Social Media Policy and Livingston County Social Media User Guidelines.
5. Wherever possible, links should direct users back to the County's official website for more information, forms, documents, or online services. Social media should not serve as a duplication of efforts, but as a way to further the goals and mission of the County.
6. The following forms of content posted by external and authorized users may be subject to removal if they contain:
  - A. Comments not topically related;
  - B. Profane language or content;
  - C. Content that promotes, fosters, or perpetuates discrimination of protected classes;
  - D. Sexual content or links to sexual content;
  - E. Solicitations of commerce or advertisements including promotion or endorsement;
  - F. Conduct or encouragement of illegal activity;
  - G. Information that may tend to compromise the safety or security of the public or public systems;
  - H. Content intended to defame any person, group, or organization;
  - I. Content that violates a legal ownership of interest of any other party, such as trademark or copyright infringement;
  - J. Violent or threatening content;
  - K. Disclosure of confidential, sensitive, or proprietary information;
  - L. Disclosure of Health Insurance Portability and Accountability Act (HIPAA) information;
  - M. Disclosure of personally identifiable information;
  - N. Disclosure of personally identifiable health information;
  - O. Disclosure of social security numbers or information;
  - P. Disclosure of Payment Card Industry Data;
  - Q. Identical posts by the same user or multiple users
7. Unacceptable content and individual violators shall be promptly documented with a screenshot or printout, emailed to the

Communication Specialist for record retention, and then removed immediately. The Communication Specialist will contact the County Administrator and Counsel on any legal issues.

8. Individuals (e.g., friends, fans, or followers) who continue to post inappropriate content shall be banned.

#### **4.7 User Behavior**

The same standards, principals, and guidelines that apply to Livingston County employees in the performance of their assigned duties apply to employee social media technology use that has to do with any aspect of work.

1. County employees authorized to use social media technology shall do so only within the scope defined in their departmental Social Media Action Plan and in compliance with all Livingston County Human Resources policies and the IT Resource Policy.
2. Social Media Coordinators performing County social media work beyond work hours shall receive pre-authorization from their Department Director.

#### **4.8 Security Compromise**

1. If a compromise is identified on any official County social media site, the appropriate Department Director and Communication Specialist should be notified immediately.
2. The Communication Specialist will immediately change appropriate passwords to isolate the incident.
3. The Communication Specialist will alert the Chief Information Officer, Human Resources, and Counsel if necessary of a security compromise.
4. The Communication Specialist will release a message alerting the site's audience that an incident occurred and steps are underway to recover the account.
5. The Communication Specialist will archive compromising content, delete the content, and restore normal site settings and features.
6. After normal site settings are recovered the Communication Specialist will audit the list of social media accounts, password holders, and digital services to ensure no further vulnerabilities exist.

### **5. Record of Updates**

This policy will evolve as new technologies and social media sites change. Please refer to this record of updates for the latest changes.

- **DATE OF BOARD ADOPTION:** This policy rescinds and replaces the Online Social Networking Policy (Resolution 2011-12-349.)



# Livingston County Social Media User Guidelines

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Livingston County welcomes dialogue with the public. The purpose of Livingston County's social media presence is to present information relevant to the purpose and mission of the County. We encourage you to engage with Livingston County via social media, but please be aware that these are moderated sites and not public forums.

By participating in Livingston County's social media sites, you agree to the following terms:

- Users will treat others with respect.
- Users take personal responsibility for their posts and any information provided.
- Users warrant that they own or have permission to post the information in their postings.

Please be aware that your postings are subject to public disclosure laws and are screened daily. Livingston County reserves the right to delete postings that contain the following:

- Comments not topically related;
- Profane language or content;
- Content that promotes, fosters, or perpetuates discrimination of protected classes;
- Sexual content or links to sexual content;
- Solicitations of commerce or advertisements including promotion or endorsement;
- Conduct or encouragement of illegal activity;
- Information that may tend to compromise the safety or security of the public or public systems;
- Content that violates a legal ownership interest of any other party, such as trademark or copyright infringement;
- Violent or threatening content;
- Disclosure of information in violation of Health Insurance Portability and Accountability Act (HIPAA);
- Disclosure of personally identifiable information;
- Disclosure of social security numbers or information;
- Disclosure of Payment Card Industry Data;
- Identical posts by the same user or multiple users

Livingston County reserves the right to delete posts that are objectionable or offensive in nature, not relevant, or inaccurate. Repeat violators of this policy may be banned from all future posts at the sole discretion of Livingston County.

If you have any questions about Livingston County's Social Media User Guidelines, please contact the Communication Specialist at [communications@livgov.com](mailto:communications@livgov.com).