

Social Media Policy

Policy Type: Corporate Communications

Policy Title: Social Media Policy

Policy Approved By: Northumberland County Council

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Applicable To: County representatives – permanent, contract or student employees, third party providers, members of Council, and volunteers – who use social media in either a professional or personal context

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Social Media Policy Statement

Northumberland County recognizes the value of social media not only as an additional medium through which to share news and information with the community, but also as a mechanism for strengthening two-way communication with residents and stakeholders; engaging in dialogue and soliciting feedback to help shape programs, policies and services.

This policy provides County representatives – permanent, contract or student employees, third party providers, members of Council, and any volunteers – who use social media in either a professional or personal context, with guidance as to roles and responsibilities related to direct or indirect references to the County, including staff, residents, stakeholders, services, priorities, policies, and other County business.

Definitions

1. Social media

A collection of web-based applications and practices that people use to share curated content, profiles, opinions, and experiences, engage in discussion with individuals and groups, and build relationships. Applications include, but are not limited to:

- a. Microblogs (Twitter);
- b. Blogging platforms (Tumblr; WordPress);
- c. Photo/video sharing platforms (i.e. Instagram; Flickr; YouTube);
- d. Social news sites (i.e. Digg, Reddit);
- e. Social networking sites (Facebook; LinkedIn);

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- f. Collaborative content creation (Wikipedia);
- g. Message boards and chat rooms;
- h. Online newspaper/magazine comment sections.

The absence of, or lack of explicit reference to, a specific site or application does not limit the extent of the application of this policy.

2. County representative

Any of the County's permanent, contract or student employees, third party providers, members of Council, and volunteers.

3. Social Media Account Manager

Individuals approved by the director of a department to manage a business unit's online presence, including posting content and communicating on behalf of the business unit using approved social media platforms.

Objectives

The objective of this policy is to establish clear expectations and standards for County representatives active on social media platforms, so that the integrity and brand of the organization is assured throughout these engagements, and there is a coordinated approach to County-led social media activities across all departments. This policy will:

1. Provide representatives with guidelines for engagement in social media platforms for approved business purposes.
2. Establish clear expectations around personal use of social media by County representatives to ensure consistency with County values and policies.
3. Establish clear expectations for dissemination of information in accordance with County policies and procedures, and with adherence to any legislated acts.
4. Confirm a standard set of Terms and Conditions of Use for County social media properties by members of the public.
5. Manage Northumberland County's brand identity and integrity.
6. Protect Northumberland County's reputation.

Scope

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This Policy applies to all County representatives across all social media platforms. It applies to all County-managed social media accounts as well as social media accounts managed by representatives for either personal or professional purposes, both during and outside of office hours. Each representative is responsible for reading and complying with this policy.

Procedures

1.0 Personal use of social media

Northumberland County recognizes that County representatives participate in social media and/or set-up online communities during their own personal time. This policy does not restrict personal use.

The policy does take a broad view of accountability. Those who identify themselves as a County representative in their personal use of social media must hold themselves to the same level of professional conduct as required by relevant County policies and procedures. All County representatives are responsible for using social media in a way that positively reflects and protects the identity and reputation of Northumberland County, as well as improves public communications.

In personal use of social media, representatives shall:

- Refrain from making any comment or posting any material that might otherwise cause damage to the County reputation or bring it into disrepute.
- Refrain from posting any content that is or could be interpreted as obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful.
- Ensure their conduct on social media aligns with other pertinent County policies, including but not limited to:
 - a. Acceptable Use (Information Technology Policy No. IT-P-01)
 - b. Code of Conduct (Human Resources Policy No. HR 4.3.1)
 - c. Workplace Bullying, Harassment & Violence (Human Resources Policy No. 4.23.2)
 - d. Confidentiality (Human Resources Policy No. 4.3.3)
 - e. Records Retention Program (Records Management Policy No. RM-02)
 - f. Freedom of Information and Protection of Privacy Act (Corporate Policy No. Corporate 2016-02)

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- g. Accessible Web Content (Communications Policy)
- Not reveal, disclose, or discuss:
 - a. County business that has confidentiality requirements;
 - b. Identifiable and/or personal information about another employee or community member that is not publicly known or without their explicit consent;
- Upon becoming aware of a breach of these requirements, report this to their supervisor in a timely fashion. The supervisor will collaborate with the Communications Department and the Corporate Services Department to determine next steps.

1.1. Elected officials and social media

It is recommended that members of County Council who establish personal social media accounts refer to the Social Media Policy as a general guideline for management of these personal accounts.

In a report received by Northumberland County Council in June 2021, the County's Integrity Commissioner noted that the open social media accounts of elected officials are "akin to the 'town square'" and that "persons may be blocked from participating, but only on notice, and for proper reasons."

The Terms and Conditions of Use in this policy provide parameters for engagement with members of the public on social media platforms, including conduct expectations and conditions under which a user may be blocked/banned from an account.

1.1.1. Key considerations

The open, transparent nature of social media can present procedural considerations for elected officials. It is important to note that:

- Communications via social media channels are not considered official County correspondence in the way email and letters to and from the Warden are deemed to be official. Nonetheless comments made on social media channels are subject to the same public and media scrutiny as any other forms of communication.
- Social media should not be used to conduct official County business, other than to informally communicate with the public.
- Council members should not engage in discussions – or receive new information – on subjects pertaining to closed public hearings.
- Members of Council who establish personal social media accounts can have links to these accounts posted to their profile at [Northumberland.ca/MeetYourCouncil](https://www.northumberland.ca/MeetYourCouncil). In the

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spirit of social media, Council members are encouraged to link back to Northumberland.ca/MeetYourCouncil.

- Links to these personal social media accounts may remain in place during general municipal elections on the basis that those running for re-election are still elected officials who continue their Council duties during election periods.
- Council members are permitted to use their portrait and group photographs in their social media communications.

2.0 Professional use of social media

2.1. Establishment of corporate social media accounts

Corporate social media accounts will be established in consultation with the pertinent department director and the Communications Department to determine the appropriate approach and platform to meet the communication needs and goals of the department. A 'Social Media Account Creation Form' must be submitted to the Communications Department to initiate this process.

The department shall appoint (a) Social Media Account Manager(s) to manage its social media presence, ensuring regular updating, monitoring and governance of the account. The Social Media Account Manager shall:

- Create the social media account, subject to the procedures outlined in this policy.
- In creating the account, identify communications@northumberland.ca as the account recovery email address.
- Where the social media platform permits, include an introductory statement which clearly specifies the purpose of the account (such as in the 'Profile' or 'About' sections of various platforms).
- Where the social media platform permits, include the Social Media Disclosure Statement.
- Submit account IDs and passwords to the Communications Department for recording in a secured, centralized password management system accessible only to the Director of Communications, the Communications Officer, and the Director of IT.
- Update social media account passwords on a yearly basis and provide updated information to the Communications Department.

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2.2. Social Media Account Managers

The following procedure describes the terms of engagement and related processes for Northumberland County Social Media Account Managers. Social Media Account Managers are the only employees with permission to communicate through social media on behalf of the County.

The Social Media Account Manager will:

- Review and comply with the County's Social Media Policy, and be trained on any department-specific protocols or procedures where appropriate, before engaging in social media.
- Comply with relevant corporate policies, including but not limited to:
 - h. Acceptable Use (Information Technology Policy No. IT-P-01)
 - i. Code of Conduct (Human Resources Policy No. HR 4.3.1)
 - j. Workplace Bullying, Harassment & Violence (Human Resources Policy No. 4.23.2)
 - k. Confidentiality (Human Resources Policy No. 4.3.3)
 - l. Records Retention Program (Records Management Policy No. RM-02)
 - m. Freedom of Information and Protection of Privacy Act (Corporate Policy No. Corporate 2016-02)
 - n. Accessible Web Content (Communications Policy)
- Adhere to the Terms and Conditions of Use of the relevant social media platform/website, as well as copyright, privacy, accessibility, defamation, contempt of court, discrimination, harassment, and other applicable laws.
- Share and comment on only that information which is designated for the public domain.
- Ensure posts are accurate and respectful of the community and audience.
- Engage their manager and the Communications Department as appropriate to assess any negative or sensitive comments posted directly to a County social media account, or identified on a given social media platform through monitoring, and determine whether and how best to respond.
- Update the information on social media as often as possible. If a campaign ends or the social media platform becomes outdated, ensure the page/account is deleted/deactivated.

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- Post the County Social Media Disclosure Statement, where possible, on applicable social media platforms, referring to the complete Terms and Conditions of Use (see Appendix A) on the County website. These Terms and Conditions detail both the County's commitment to updating and responding via a given channel, as well as the principles by which the County will govern content posted to this channel.
- Upon becoming aware of a breach of these requirements, report this to their supervisor in a timely fashion. The supervisor will collaborate with the Communications Department and the Corporate Services Department to determine next steps.

The Social Media Account Manager will not:

- Be the first to make an announcement (unless specifically given permission to do so) regarding major, political or embargoed information. If unsure, the Social Media Account Manager will discuss with their manager and/or the Communications Department.
- Post or respond to material that is obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful, other than to advise the individual responsible for the post that they will be blocked if such conduct continues. (See Terms and Conditions of Use in Appendix A).
- Promote personal opinions or endorsements of – or content that could be considered endorsement of - political campaigns.
- Share any confidential or secure information, make any comment, or post any material that might otherwise cause damage to the County reputation or bring it into disrepute.

3.0 Use of Photos/Video

- Photos/videos must meet all Code of Conduct requirements.
- Photos/videos must relate to a County program, service, or priority. Photos/videos of a personal nature related to a representative's personal activities outside of work that are unconnected to County operations and priorities should not be posted to County social media accounts.
- Consent will be assumed for photos/videos of large-scale events or other activities that are part of everyday County business.
- Where photos/videos are taken of smaller group/individual activities, the photographer will advise individuals that these will be posted to County web/social media channels.
 - a. Where an individual requests that photos/videos including their image not be used, the photographer will ensure adherence to this request.

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- b. Where a photo/video has been posted, and an individual requests that this be removed due to their image being included, the Social Media Account Manager will make every effort within reason to comply with this request.

4.0 Accessibility

Northumberland County's Web Content Accessibility Policy establishes direction supporting Northumberland County's compliance with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, as required for all public sector organizations. WCAG Guidelines include requirements related to the accessibility of social media content. This is in accordance with section 14 of the Integrated Accessibility Standards (O. Reg. 191/11) under the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

In accordance with the AODA and the procedures outlined in the County's Web Content Accessibility Policy, all Social Media Account Managers shall:

- Include manual alt text on all images (see help centre instructions for pertinent platforms);
- Provide captions that convey all spoken words and significant audible sounds in all videos pre-recorded after 2012 (please refer to the 'Videos' section of the Northumberland County Web Content Accessibility Policy for more information); and
- Follow best practices for accessible writing including using plain language, Friendly URLs, and spelling out acronyms the first time they are used in each post.

5.0 Records Retention

All content created and collected through social media is subject to the County's Records Retention By-Law No. 27-12.

For any content posted by a member of the public to a County social media account that is removed because it is deemed in violation of this policy or any applicable law, a record will be retained by the Social Media Account Manager, and have supporting documentation, including the time, date, identity of poster, reason for removal, and any required incident reporting.

6.0 General Guidance

All users of social media should:

- Understand that online content is not private. Social media platforms may have different levels of access. Some are open to anyone, and others restrict membership. Although postings, comments, and content on restricted access communities (password

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protected) may seem like a private conversation, the content may still become publicly accessible and available (i.e. nothing is ever off the record).

- Consider that posted content can exist for an indefinite period of time and could be shared by others.
- Avoid identifying, discussing or posting the multimedia of others – including clients, partners, vendors, or co-workers – unless you give credit to the content owner.
- Be aware that redirecting to another site may imply an endorsement of its content.
- Only those authorized by the County may use any and all approved County corporate or program branding or logos in communications. The County logo should not be used in personal social media activities.

The County reserves the right to:

- Restrict or remove, without notice, any content from a County social media channel that is deemed in violation of this policy or any applicable law.
- Block/ban specific users from the County's social media channels who, after being provided with notice of conduct requirements as stipulated in the Terms and Conditions of Use for posting to County social media channels, continue to post in a manner that is in violation of this policy.
- Withdraw access to social media by departments, business units, or Social Media Account Managers at any time for failure to comply with the requirements of this policy or its related procedures.

7.0 - Breach of Policy

Violation of this policy may result in disciplinary action up to and including dismissal.

Review

This policy will be reviewed annually to ensure that it continues to meet the needs of the organization.

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Appendix “A”: Social Media Terms and Conditions of Use

The Social Media Disclosure Statement should be posted, where possible, on applicable social media platforms, referring to the complete Terms and Conditions of Use posted on the County website. The Disclosure Statement outlines general guidelines for the social media channel:

- “Northumberland County welcomes your opinions, and encourages open, respectful discussion about the topics posted. We reserve the right to modify or remove content that is off-topic, contains advertising, uses offensive or inappropriate language, defames or infringes on someone’s rights, or is in violation of law. To review the full Terms and Conditions of Use for Northumberland County social media accounts, please review our Social Media Policy available at Northumberland.ca/SocialMedia”.

The full Terms and Conditions of Use detail both the County’s commitment to updating and responding via a given channel, as well as the principles by which the County will govern content posted to this channel by both Social Media Account Managers and members of the public.

Introduction

The following terms and conditions are in place to govern the use of social media platforms managed by Northumberland County (‘the County’). By visiting and/or posting on these platforms, users agree to follow the terms and conditions below.

Hours of Operation

The County is committed to using its social media channels as an effective method of communication with interested users. All sites will be monitored during regular business hours of Monday to Friday 8:30 A.M. to 4:30 P.M.

Excellent customer service is a priority for Northumberland County, and every attempt will be made to respond to inquiries via social media in a timely manner during office hours. However, turnaround times are impacted by staff availability and resources across the corporation, and there will be instances when response times may be extended.

In addition, there are some situations that are best dealt directly with specific departmental staff, and responses may therefore be limited to providing relevant department contact information for further discussion. The County encourages members of the public to contact us with official communication via traditional channels (phone, email, in-person).

The County assumes no responsibility for lack of service due to channel-related downtime or issues.

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Code of Conduct

Northumberland County seeks to foster an inclusive and welcoming online community where people interact and share perspectives and ideas in a thoughtful and respectful manner. To build and maintain such collaborative spaces, the Code of Conduct requires those posting to County social media accounts to adhere to the following:

- Be fair and respectful
- Aim for accuracy
- Add value
- Follow the law
- Stay on topic and avoid inappropriate topics
- Respect intellectual property
- Do not post spam or other commercial messages
- Protect privacy – your own and others’
- Protect confidential information

Guidelines for participation

Content, comments, or links posted to County social media channels that contain any of the following will not be acknowledged, and may be modified or removed:

- Any illegal activity or encouragement of illegal activity;
- Solicitation of commerce;
- Any confidential information including but not limited to any personal information or personal health information of others;
- Promotion of political candidates;
- Content that violates legal ownership interests of any other party including but not limited to any unauthorized use of copyrighted materials or trademarks.

Users may not use the County name or any related moniker to endorse or promote any product, opinion or cause. Representation of users’ opinion as endorsed by the County is strictly prohibited.

The County is not responsible for the authenticity or suitability of content posted to its social media platforms by users.

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Health & Safety

In accordance with Northumberland County's Vision, Mission and Core Values, and with the commitment to protect County employees from harm and harassment in the workplace, the County will not condone any of the following on social media:

- Abusive, profane, derogatory, or offensive comments;
- Slanderous or defamatory remarks, obscene language or sexual content;
- Content that promotes, fosters, or encourages discrimination based on race, creed, colour, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation;
- Information that may compromise the safety or security of the public, public systems or employees of the County.

Account moderation

Should comments or other content posted to a County-managed social media channel violate the Code of Conduct, the following steps will be taken:

- **Step 1:** The County will remove the comment/post/tweet without notice (if not possible to remove directly, the County will request that the source remove the post). In the event of a second offence, the County will remove the post and advise the source that they will be blocked if the conduct continues, as per the Terms and Conditions of Use.
- **Step 2:** If the County's request does not result in the removal of the offensive content/the discontinuance of the offending conduct, the County will block the user account.
- **Step 3:** The Social Media Account Manager will retain a record of the content along with supporting documentation, including the time, date, identity of poster, reason for removal, and any required incident reporting.

The County reserves the right to block specific user accounts from the County's social media accounts whose activities do not comply with this Social Media Policy.

Privacy

The County will adhere to all applicable legislation regarding privacy and freedom of information. The County is subject to Ontario's Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56 ("MFIPPA") and other privacy legislation.

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Users should be aware that personal and other information contained in electronic correspondence (or printed copies of this electronic correspondence) directed to the County is subject to MFIPPA. This information may be deemed releasable under this legislation and the anonymity of the sender and confidentiality of any information contained in the correspondence cannot be guaranteed.

Records Retention

All content created and collected through social media is subject to the County's Records Retention By-Law No. 27-12.

For any content posted by a member of the public to a County social media account that is removed because it is deemed in violation of this policy or any applicable law, a record will be retained by the Social Media Account Manager, and have supporting documentation, including the time, date, identity of poster, reason for removal, and any required incident reporting.

Use of Collected Information

Unless explicitly stated, the County does not collect or distribute information garnered through the use of social media platforms for commercial or marketing purposes.

The County will not use any information provided by users for any purpose that is not consistent with the purpose for which the information was provided as stated on the social media platform.

Disclaimer

- The third party social media sites that the County chooses to use are provided on an "as is" and "as available" basis. The County makes no representations or guarantees around the site's security, operation, information, privacy setting changes, content, or material included on these sites.
- Any comments, images or videos that are posted by any third parties are not representative of the County. The County cannot guarantee the privacy of users on any third party owned sites. Users are subject to the terms and conditions of the social media application on which they post information. Users should be sure to review the third party terms and conditions on social media sites prior to agreeing to engage in posting comments or information on their site.
- The County is not responsible for any losses or damages incurred as a result of using third party social media sites. Individuals who choose to use these sites do so at their own risk and are aware of the potential liabilities; as such they accept that they have no legal recourse against the County related to such use.

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- The third party site is able to change their settings without sending notification to the County or to users. The County is not responsible for the lack of notification around these changes and as such will not be liable for any damages of any kind arising from the use or inability to use these sites.
- If another social media site lists the County or any of its departments, programs or services as a link on their own site, it does not imply an endorsement or sponsorship by the County of that website or its creator.
- By interacting via the County's social media channels, users are aware and give their consent to have their information become a part of the public record and may be used in County documentation. The County has the discretion as to which information and comments are saved from social media sites to become a part of this documentation.
- By using this social media platform you acknowledge that you have read and are agreeing to the Terms and Conditions of Use for County social media channels and for the third party social media site.

Modification of Terms and Conditions of Use

The County reserves the right to change the Terms and Conditions of Use at any time and at its sole discretion. Continued use of a social media site constitutes a user's agreement to all of the aforementioned terms and conditions of use.

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Appendix B: Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand Northumberland County's **Social Media Policy**. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the procedures outlined in this policy, I may face disciplinary action up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____