SOCIAL MEDIA
Standard Operating Procedures

Lee County Government
Lee County Social Media Standard Operating Procedures: Version 1.6

Updated: October 2016

Purpose:
To address the needs of citizens in a rapidly changing technological environment, Lee County provides information through interactive social media platforms. These standard operating procedures establish guidelines for the creation and use of such social media sites as Facebook, Twitter, YouTube, etc.

Mission:
Because Lee County seeks to enhance transparency and public dialogue, and because the public expects to participate in the social media experience, Lee County encourages the use of social media sites for two-way communication by those county departments that serve the public, where appropriate.

Creating New Social Media Pages:

Lee County Administration must provide written approval of all county department social media sites prior to their creation.

1. Submit requests for approval to Lee County Website Content Coordinator, including: 1) type of social media account and 2) concept, target audience and plan for promoting/cross-promoting the site(s).
2. Read the Social Media Archiving Agreement on p. 7 to determine if it must be submitted with request for approval.
3. If approved, you will need to create a free Gmail account to be used by the department’s designated content manager(s) for the sole purpose of creating and maintain its social media sites. **Do not send correspondence from this Gmail account.** You must provide the Gmail login information to Website Content Coordinator. If your department doesn't already have one, request that ITG create a social media “sm” email address – format: departmentsm@leegov.com – **to which you must forward your Gmail email.** Multiple content managers, also known as administrators, can log into either account and post representing the department with a department logo icon. (More personalized posts from specific topic experts would require an identifying name/title signature line at the end of each post).
4. Upon approval of Facebook, Twitter or YouTube accounts, use the corresponding document (found in the Webmasters & Social Media intranet site’s shared documents, or provided upon request) containing specific instructions on how to properly set up your specific type of social media account with only those permitted functions and features of an official Lee County Government department site.

Updating Existing Social Media Pages:
If a department previously created a social media page(s) under a personal email or individual county email address, switch it over to a department social media Gmail account (linked to your leegov.com “sm” email) for account administration as soon as possible.

Submit a request for a new “sm” email address to the Website Content Coordinator. ITG will create the “sm” email address for your department. For Facebook, the department’s designated administrator must log into to the Facebook Account -> Account Settings -> Settings tab to make the change. (Any exemptions to the “sm” email address require county administration approval. Submit request to Website Content Coordinator.) Work with Website Content Coordinator to bring existing site(s) into compliance with County- permitted functions and features.

Passwords:
Lee County’s Website Content Coordinator must have access to edit or remove content from all departments’ social media sites. The department’s designated content manager will make the Website Content Coordinator an administrator and provide login and password information via telephone because emails are public record. If any social media administrators leave County employment, passwords must be changed. Notify Website Content Coordinator of any changes.

Public Comment Policy and Removing Posts:
Any posts that violate the Lee County Public Comment Policy must be removed immediately. Hide violating posts whenever possible; delete if necessary after taking a screenshot. All official Lee County social media pages must contain the complete policy disclaimer printed in bold below when possible. County admin will insert a custom tab onto each department’s Facebook page. On sites without tabs, create a link to a page that you post on your department website or to the page on the County’s main website at http://leegov.com/socialmediapolicy. Notify the Website Content Coordinator if any social media site does not permit this.

LEE COUNTY PUBLIC COMMENT POLICY

The purpose of this site is to encourage courteous communication between Lee County and the public. Comments will not be edited by staff, but may be deleted if found to be in violation of this policy.

Posts (including screen names/images) that contain any of the following shall not be allowed:

- Obscene, profane, violent, threatening, hateful, harassing or offensive language or content
- Personal attacks of any kind, including discrimination based on race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, physical appearance, sexual orientation or financial status
- Defamation or accusations of criminal conduct or immoral activity. If a person believes there is a legitimate complaint against the County or a County employee, contact the appropriate department director via telephone or email.
- Sexual content or links to sexual content
- Solicitations, advertisements or endorsements of any financial, commercial or
non-governmental agency
- Conduct or encouragement of illegal activity
- Violating copyrights or trademarks
- Compromising the safety or security of the public or public systems
- Invasion of an individual’s right to privacy
- Promoting or opposing political campaigns or ballot measures
- Off-topic posts or repetitive copied posts

Lee County is not liable for the content of comments posted to this site and reserves the right to restrict or remove any content deemed in violation of this social media policy or any applicable law. This comment policy is subject to amendment or modification at any time.

Under Florida law, all content on any Lee County social media site is subject to the public records law, Chapter 119, Florida Statutes. Florida has a very broad public records law. Most written communications to or from Lee County employees and officials regarding County business is considered public record available to the public and media upon request. Any communication made through social networking websites may be subject to public disclosure. Any public disclosure requests must be directed to County Administration.

[end of public comment policy]

Records Retention and Florida’s Public Records Law:
Lee County’s social media pages are subject to Florida’s public records law. County Administration is using searchable records retention programs that archive our social media pages as well as to archive the Gmail email accounts used to manage the pages.

If you receive a public records request, contact the Website Content Coordinator for retrieval. Certain third-party add-on applications cannot be archived by the programs. If you still opt to use them, you will be required to sign the Archiving Agreement on p. 7 and manually back up your data every two weeks. You must get County Administration permission before adding any apps to your social media sites.

Posting/Updating/Answering Questions:

1. The department director will designate one or more social media administrators. They will have access to the Gmail and/or leegov.com “sm” email password to edit the page, including post messages and photos and reply to citizen comments/questions.

2. The department director will determine an updating schedule (MINIMUM REQUIREMENT: Post updates and check for citizen comments awaiting reply once per workday. Hide anything that violates our posting policy immediately. If you do not have the option to hide, delete after taking a screen shot.)

3. The department director will decide if designated administrators must get his/her approval prior to posting. Keep in mind that timeliness in posting responses is important.
4. If you have more than one type of social media account, use the HootSuite Social Media Dashboard to schedule updates, coordinate multiple social media administrators and more. Provide Website Content Coordinator with your Hootsuite login information.

5. Write posts specific to each type of social media. DO NOT set up automatic reposting of one type of social media onto another type. The public will notice that it’s not a live person maintaining the site.

6. If a social media administrator does not know the answer to a citizen question, he/she should contact the department’s appropriate topic expert to get the correct answer and respond as quickly as possible.

7. If you accidently post an inaccurate statement, correct the false information immediately and acknowledge your mistake.

8. Correct inaccuracies posted by citizens, but don’t engage in heated debates. You are representing Lee County. Do not post your own personal, political or religious comments or beliefs, or anything that violates the county’s public comment policy.

9. No County employee’s personal email addresses should be posted on these sites.

10. If volunteers have been given authorization to post to your social media site, it must be stated in your “About” section.

11. If a citizen’s post accuses a county employee of inappropriate behavior, notify the appropriate department director and remove the post in accordance with the posting policy.

12. Department information posted on social media sites should also appear on the department’s website, whenever possible.

13. References to information posted on the department’s website should have hyperlinks back to the website.

14. Post time-sensitive information as quickly as possible (such as emergency information, closings, etc.)

15. Post advance notice of events as a marketing/promotional tool.

16. If multiple people are posting as “the department,” keep a consistent, chatty tone (when appropriate).

17. More social media sites are allowing the use of hashtags to create searchable conversations. When appropriate, create short, simple hashtags that are easy to remember (no underscores, no spaces). Make sure your hashtag isn’t already being used by looking it up on the social media site you plan to use it on. Coordinate with your department PIO to use the same hashtags in social media and press releases to promote your events.

18. To share information regarding hurricanes or other local emergencies, direct your followers to the Lee County Emergency Operations Center's social media sites for official information.

**Posting Images (Photos/Clip Art):**
Be careful not to infringe on copyrights when posting images, whether photographs or clip art. Even if you have the right to post an image, you may be required to credit the photographer or artist.
Consent for Images

Florida's Right of Publicity Law protects against unauthorized publication of a person’s name or likeness for commercial purposes, under Section 540.08, Florida Statutes.

When taking photos or videos of the public for use on the website, in social media or for other marketing purposes:

- Consent forms are not required for the use of a person’s image as a member of the public at a Lee County event that is open to the public, as long as you don’t name or otherwise identify the person. If you identify the person, written consent is required to be signed by the person, or by parent/guardian if younger than 18.

- Do not use any person’s name or image to promote a product or service of Lee County (commercial purpose) without written consent.

The County Attorney's Office can provide approved consent form language if needed.

DO NOT POST anything that can identify the victim of an accident (person’s name or image, vehicle license plate, etc.), per the HIPAA health information privacy rule.

You may post these images:

- Original images created by Lee County employees.
- Original images created by professional photographers/artists if they have granted Lee County permission to post.
- Images with a Creative Commons license (attribution may be required)

Use of Personal Devices to Post to County Social Media Sites:

If you have been granted permission to post to your department’s social media site, always try to use a County-issued desktop computer or County-issued mobile device for greater security. If you don’t have access to a County-issued device and need to post in a timely fashion, you have the option to post using your personal device if you ensure that your personal information is kept separate from County information:

- Log in as the County page, not as yourself, when posting to the County social media site.
- Log in as yourself, not the County, when posting to your personal social media sites.
- Never post personal information to the County social media site.

Please remember that official County business, regardless of device used, is subject to the Public Records law. You could have to turn your device over for discovery upon request during legal action.
Personal Use of Social Media:
Employees who wish to be fans or followers of Lee County social media sites are encouraged to create a personal account that is used solely for professional purposes to protect your privacy. Any of your personal information viewable by the public must abide by the County’s values, ethics and employee conduct expectations, as found in your employee handbook, regardless if you identify yourself online as a county employee.

Existing Policies:
County use of social media sites will comply with all provisions of Florida law, resolutions, ordinances and policies of Lee County. Without limitation, these laws and policies will include Chapter 119, the Florida Public Records Act; Computer Resources, Policy 204; Behavior of Employees, Policy 101; and laws governing the appropriate use of the Internet. Lee County is not liable for content that is posted by personnel not acting in the course of their authorized public duties.

Web Metrics:
Most social media sites offer some type of web metrics that capture data to track user trends and can allow us to reach a target audience. Please monitor the web metrics for your social media sites to determine what features and topics are popular among your followers.

Social Media Policy Updates:
Social media is constantly evolving. This SOP will be updated/revised as necessary. Please contact Lee County's Website Content Coordinator if new social media features are offered for your site(s) before you implement them. If you have any suggestions for how Lee County can improve its use of social media platforms, or ways in which this policy can be improved, please let us know. Also, if you notice inaccuracies, discrepancies or inappropriate postings on any Lee County social media sites, please notify the Website Content Coordinator.

SOCIAL MEDIA ARCHIVING AGREEMENT

Lee County social media sites must be archived to comply with Florida’s Public Records Law.

If your department is applying for approval to activate a social media account that Lee County is unable to automatically archive for you (contact website content coordinator for current list), you MUST sign the following agreement and submit it to the Website Content Coordinator prior to activating the account.
__________________________ will take full responsibility to meet Florida’s Lee County Department Public Records laws by manually archiving all content on ________________________ social media site(s) in a searchable format at least once every two weeks in perpetuity unless and until an automatic archiving system becomes available. I understand that unintentional violations are punishable by a fine of up to $500; intentional violations are punishable by up to one year in jail and/or a fine of up to $1,000.

____________________________________  __________________________
Department Director    Department Social Media Webmaster

_________________________    __________________
Date       Date