City of Two Harbors
Communications Policy

Communications, Social Media, Email and Text Message Guidelines
Adopted March 13, 2017

PURPOSE

The City of Two Harbors strives to provide the public accurate and timely information, communicated in a professional manner, and in accordance with the laws regarding public information and data practices.

This policy provides guidelines for all external communications from the city using various mediums including:

- Printed materials such as newsletters, articles, and brochures.
- Electronic materials such as email, postings to web sites or social media sites.
- Media relations such as requests for interviews, news releases, and media inquiries.
- City owned signs

The city recognizes that elected officials, representatives or employees (hereinafter “City Representatives”) may sometimes comment on city matters outside of official role as an employee of the City of Two Harbors. Therefore, this policy also provides guidelines for City Representatives when communicating as a private citizen on matters pertaining to city business.

GENERAL GUIDELINES FOR ALL COMMUNICATIONS (OFFICIAL AND PERSONAL)

All City Representatives and representatives have a responsibility to help communicate accurate and timely information to the public in a professional manner. If any mistakes are noticed or suspected in the information communicated to the public, such mistakes shall be brought to the attention of the City Administrator. Regardless of whether the communication is in the City Representatives’ official city role or in a personal capacity, City Representatives must comply with all laws related to trademark, copyright, software use etc. City Representatives must also follow all city policies that may apply. Examples of relevant policies include:

- **Technology and Computer Use Policy.** City Representatives may use city technology for personal reasons on a limited basis provided it does not interfere with normal work. The city reserves the right to inspect all electronic data made utilizing a city-owned computer or related system. This policy should be reviewed and complied with in full.

- **Respectful Workplace Policy.** City Representatives cannot publish information that is discriminatory, harassing, threatening, or sexually explicit. This policy should be reviewed and complied with in full.

- **Data Practices Policy.** City Representatives cannot disclose private or confidential information and must route data practices requests to the responsible authority. City
Representatives are also bound by the City’s Data Practices Policy with respect to access to data in the City’s Possession. This policy should be reviewed and complied with in full.

- **Political Activity Policy.** City Representatives cannot use city resources or participate in personal political activity while on city time or while discharging city responsibilities. No City Representative may act in a manner that suggests that the city either supports a particular candidate or political issue, or endorses the personal political opinions of the City Representative. This policy should be reviewed and complied with in full.

### ADDITIONAL GUIDELINES FOR OFFICIAL CITY COMMUNICATIONS

**The City Scene Newsletter (Official Publication of the City of Two Harbors)**

All submissions for the City Scene Newsletter must be directly related to a program or service provided by the City of Two Harbors and must be approved by **City Administrator**. Outside groups or agencies requesting submissions into the City Scene may only be allowed to do so if the request is directly related to a current city program or service.

**Liquor Store Message Board**

The City of Two Harbors liquor store message board shall promote city activities or public information, city sponsored events, and only if former are not being posted, the activities of non-profit organizations. All requests for messages must comply with the provisions outlined on the liquor store sign message request form.

**Handling General Requests:**

All City Representatives are responsible for communicating basic and routine information to the public in relation to their specific job duties. Requests for private data or information outside of the scope of an individual’s job duties should be routed to the appropriate department, to the data practices responsible authority, or the City Administrator.

**Handling Media Requests:**

With the exception of routine events and basic information that is readily available to the public, all requests for interviews or information from the media shall be routed through the City Administrator. Media requests include anything intended to be published or viewable to others in some form such as television, radio, newspapers, newsletters, and web sites. When responding to media requests, City Representatives should follow these steps:

1. If the request is for routine or public information (such as a meeting time or agenda) provide the information and notify City Administrator of the request.
2. If the request is regarding information about city personnel, potential litigation, controversial issues, an opinion on a city matter, or if you are unsure if it is a “routine” question, forward the request to the City Administrator. An appropriate response would be, “I’m sorry, I don’t have the full information regarding that issue. Let me take some basic information and submit your request to the appropriate person who will get back to you as soon as he/she can.”
3. Ask the media representative’s name, questions, deadline, and contact information.

**Communicating on behalf of the city**
The City Administrator and department directors are authorized to communicate on behalf of the City in interviews, publications, news releases, on social media sites, and related communications. Other City Representatives may represent the city if approved by one of these individuals to communicate on a specific topic. When speaking on behalf of the city:

- The person speaking must identify themselves as representing the city. Account names on social media sites must clearly be connected to the city and approved by City Administrator.
- All information must be respectful, professional and truthful. Corrections must be issued when needed.
- Personal opinions generally do not belong in official city statements. One exception is communication related to promoting a city service. For example, if a City Representative posted on the city’s Facebook page, “My family visited Hill Park this weekend and really enjoyed the new band shelter”. City Representatives who have been approved to use social media sites on behalf of the city should seek assistance from the City Administrator on this topic.
- City Representatives need to notify the City Administrator if they will be using their personal technology (cell phones, home computer, cameras, etc) for city business. City Representatives should be aware that data transmitted or stored may be subject to the data practices act.

ADDITIONAL GUIDELINES FOR PERSONAL COMMUNICATIONS

It is important for City Representatives to remember that the personal communications of City Representatives may reflect on the city, especially if City Representatives are commenting on city business. The following guidelines apply to personal communications including various forms such as social media (Facebook, Twitter, blogs, YouTube, etc), letters to the editor of newspapers, and personal endorsements.

- Remember that what you write is public, and will be so for a long time. It may also be spread to large audiences. Use common sense when using email or social media sites. It is a good idea to refrain from sending or posting information that you would not want your boss or other City Representatives to read, or that you would be embarrassed to see in the newspaper.
- The City of Two Harbors expects its City Representatives to be truthful, courteous and respectful towards supervisors, co-workers, citizens, customers and other persons associated with the city. Do not engage in name-calling or personal attacks.
- If you publish something related to city business, identify yourself and use a disclaimer such as, “I am a representative of the city of Two Harbors. However, these are my own opinions and do not represent those of the City of Two Harbors.”
- City resources, working time, or official city positions cannot be used for personal profit or business interests, or to participate in personal political activity. For example, a building inspector could not use the city’s logo, email, or working time to promote his/her side business as a plumber.
- Personal social media account names or email names should not be tied to the city (e.g. MosquitoHeightsCop)
CITY DEPARTMENT SOCIAL MEDIA SITES (CITY HALL, LIQUOR STORE, POLICE, ETC.)

To comply with the Data Practices Act, City Social Media Sites should be set up by an authorized City Representative and the comments and replies shall be deactivated. This eliminates the need for constant monitoring for offensive or negative comments and provides easier compliance with data practice regulations. All accounts shall provide a contact email and telephone number where comments and questions are to be directed.

All posts, comments and replies on any official social media account of the City are subject to the data practices and records retention policies.

EMAIL RETENTION GUIDELINES

Emails may contain information that qualifies as an official government record. These emails and any attached electronic documents must be kept in accordance with the city’s records retention schedule. For example, an email from a citizen to the city clerk complaining about junk on a neighbor’s property is a government record. Pursuant to the General Records Retention Schedule for Minnesota Cities, it must be maintained for 7 years. However, the subject matter of most city emails does not qualify as a government record. For example, an email from a department head requesting an administrative assistant to complete a routine task, or an email asking whether anyone wants to go out to lunch would generally not qualify as official government records. These transitory or personal emails should generally be deleted when they are no longer needed. Also duplicate copies generally do not qualify as official government records.

Emails that do not qualify as government records do not need to be retained according to a record retention schedule. There are good reasons to dispose of emails and other electronic documents when they are no longer needed. Emails take up memory and affect the efficient operation of city computers. Even if emails are not government records, they are still considered data under the Minnesota Government Data Practices Act and would have to be produced in response to a data practices request. Emails not qualifying as official government records should be deleted on a regular basis.

TEXT MESSAGE GUIDELINES

If city employees or officials use text messages for official government business, their text messages may be official government records subject to records management laws. Text messages are also government data and subject to the Minnesota Government Data Practices Act.

QUESTIONS

Questions related to this policy should be directed to City Administrator.