Town of Belleair Social Media Policy

Objectives/Purposes

This Town of Belleair ("Town") Policy Governing Town Use of Social Media ("Policy") functions to provide policies and procedures for Town utilization of social media services to ensure consistency with the Town's brand and message. This Policy is narrowly tailored in recognition of the Town's compelling and significant interests, which includes but are not limited to: ensuring compliance with federal, state, and local law, Florida's public records law and the Florida Sunshine Law; to promote and maintain an efficient workplace and work environment for Town business; the provision of services that benefit the public health, safety, and welfare. Adequate and ample alternative channels to convey various Town-related commercial or personal messages exist that are not limited or affected by this Policy, including but not limited to: speaking during public comment portions of Town meetings; posting or creating content on websites or social media services that are not Town social media accounts; or using alternative means of communication that do not involve Town websites or social media services. Such alternative methods are reasonable for the affected speaker to communicate directly to his or her intended audience.

This Policy is also intended to function as a guide and clear communication to users of the Town's social media services of the best lawful practice and operational realities in utilizing Town social media services when used for purposes relating to or perpetuating Town business. The Town intends to operate its social media applications in two different formats relating to the government speech doctrine versus the creation of a designated or limited public forum. For Town-utilized social media services where the Town has disabled the ability of the public to comment or post, or in the event such disabling is unavailable, removed, or deleted, or the Town has otherwise communicated or posted a statement that the Town is not seeking or soliciting public comment or postings, then the Town-utilized social media services shall function solely as an expression of the Town's government related speech and viewpoint. Such government speech shall relate to the Town's preservation of the ability to promote itself and Town-related news and events, to share governmental related messages and opinions that the Town and its Commission desires to communicate, and to otherwise craft and limit the content and views of the speech of the Town in order to convey information for the purposes set forth herein as the Town desires in its sole discretion as selected by the Town Manager or designee (subject to the direction and control of the Town Commission). At its core, the Town's government speech shall be justified based upon the premise that, in order to function, the Town must have the ability to express certain points of view on most issues, including control over that expression, without providing for the expression of contrary views.

In contrast, in circumstances where the Town *actively solicits, encourages, or permits public comments or postings from the public* and has not otherwise disabled (or deleted public comments from a Town-utilized social media service where disabling comments is unavailable), then the Town-utilized social media services shall be construed as creating a designated or limited public forum in accordance with the topical and expressive parameters provided in this Policy. The Town retains the exclusive right to treat Town-utilized social media services as designated or limited public forum or, alternatively, as a forum for the sole expression of the Town's government speech alone at any time and without notice. Such conversion or modification of a traditional or limited

public forum to a forum only allowing the Town's government speech may occur through disabling all comments on the particular social media service, or if the ability to disable comments is unavailable, through the Town's clear communication that public comments or posts are not solicited, will no longer be accepted, and will be deleted as soon as practicable under the circumstances. At all times, however, utilization of Town social media services is intended primarily as a means for the Town to express its own content and viewpoint consistent with the government speech doctrine, to inform and educate the public, to efficiently and timely perform Town-related tasks, and to otherwise provide an alternative avenue for the Town itself to directly communicate to the public.

Responsibilities:

The Town Manager or designee is ultimately responsible for the maintenance and monitoring of all Town social media accounts in accordance with this policy. The Town Manager's Office is the primary point of contact for each Town department/operating unit, and will provide an overview and training of this social media policy and its implementation.

The Town Clerk's Office will oversee the records management program with support from the Town Manager's Office. The Town's Information Technology consultant will provide the necessary technology services, security, guidance, and technical assistance for effective social media usage. Authorized users are responsible for actively engaging in social media by posting pertinent information on behalf of the Town on a consistent basis and in compliance with this social media policy.

Policy:

It is the policy of the Town to adopt a procedure to guide all interaction with social media platforms and its accompanying guidelines that provides a standard approach to the collaboration and sharing of information on and in various public domains to provide consistent communication across all media.

<u>Social Media Usage</u>

- While social media platforms provide an effective forum for building relationships and conveying information, these platforms do not serve as the Town's sole or even primary means of communication with residents, businesses, and others. The Town's social media accounts are intended to be used for secondary informational purposes only.

- Social media is a particularly ineffective tool for communicating about complex issues. The Town will use more appropriate means to communicate detailed information about complex issues and to discuss concerns with citizens and others.

- Practical and legal considerations may sometimes constrain, prevent, or prohibit discussion of certain topics, such as court cases, through this medium.

- Comments that offer thoughtful criticism of the organization (not individuals) and Town initiatives shall not be removed or altered (where the Town has chosen to create a limited public forum) except as provided for in this policy.

- The Town reserves the right to restrict or remove any content that is deemed in violation of this policy or any applicable law. The Town's social media articles, posts or comments containing any of the following forms of content shall not be allowed and shall be removed as soon as possible:

  ► Profane language or content
  ► Comments not topically related to the post being commented upon
  ► Personal or character attacks
  ► Content that promotes, fosters, or perpetuates discrimination
  ► Sexual content or links to sexual content
  ► Advertisements not authorized by the Town
  ► Hyperlinks to third party websites or advertisements regarding third party events unless the Town has become a co-sponsor of the event
  ► Illegal conduct or encouragement of illegal activity
  ► Information that may compromise the safety or security of the public or public systems
  ► Content that violates a legal ownership interest of any other party
  ► Content related to a political campaign including, but not limited to content pertaining to fundraising activities promoting or opposing any person campaigning for election to a political office

- Users shall be informed that by posting to the Town's social media sites the Town relinquishes any and all responsibility and liability for any materials that the Town deems inappropriate for posting, which cannot be removed in an expeditious and otherwise timely manner.

- These guidelines must be readily available for review to residents and community groups by hyperlink on the Town's website. Any content removed based on these guidelines must be retained, including the time, date and identity of the poster when available, in accordance with the Town's policy on the retention of such information.

<u>General Procedures and Maintenance of Town-owned Accounts</u>

- The Town will utilize one central account and, upon the approval of the Town Manager, accounts for individual Town departments with desired social media networks (e.g., Facebook, Instagram, X, and others). Individual Town departments, units, and employees must, with authorization of the Town Manager, only utilize authorized accounts to convey desired Town communications.

- An introductory statement that clearly specifies the purpose and topical scope of the Town's social media presence will be included on all platforms used.

- Management of social media accounts and initiatives shall lie primarily within the Town Manager or designee.

- The Town Manager may give a limited number of staff members access to social media accounts and passwords, and permission to post as "the Town of Belleair" or as a representative of the Town Department.

- Town staff members who are not Authorized Users may request that the Town Manager or designee post a message from the Town on their behalf.

- The Town Manager's Office will provide training on social media usage for authorized users in the Town.

- The Town shall not post purposefully inaccurate information. If an inadvertent inaccuracy is posted, a correction will be published as soon as possible.

- Designated Town staff members may post comments/replies without advance review or permission of Town management. However, if staff members have concerns or desire advance review, they may request such from the Town Manager or designee.

- Pursuant to Florida Statutes § 106.113(2), the Town, or a person acting on behalf of the Town shall not expend or authorize the expenditure of public funds for a political advertisement or any other communication sent to electors concerning an issue, referendum, or amendment, including any state question, that is subject to a vote of the electors. This prohibition applies to a communication initiated by the Town or a person acting on behalf of the Town, irrespective of whether the communication is limited to factual information or advocates for the passage or defeat of an issue, referendum, or amendment. This prohibition does not preclude the Town or a person acting on behalf of the Town from reporting on official actions of the Town Commission in an accurate, fair, and impartial manner; posting factual information on the Town's website or in printed materials; hosting and providing information at a public forum; providing factual information in response to an inquiry; or providing information as otherwise authorized or required by law.

- The Town will not edit others' comments. However, if others' comments are not in compliance with the standards for content listed above, the comments will be removed.

- Any content removed based on this guideline will be retained, including the time, date, and identity of the poster when available, in accordance with public records laws.

<u>Guidelines for Authorized Users</u>

- Social media posts made by the Town must pertain to Town news or Town-sponsored/partnered events only.

- As part of the interactive approach to using social media, the Town Manager or designee may follow, message, like, tag, share, and repost posts that contain content that is relevant to the Town's mission. However, in no circumstance may the Town follow, message, like, tag, share, or re-post content of any candidate for Town Commission or other political office.

- The Town's authorized users will approach the use of social media tools as consistently as possible.

- At all times, authorized users shall use good judgment when posting.

- Employees must refrain from posts that may be interpreted as offensive, obscene, demeaning, or inflammatory.

- Documents or information made confidential under Florida's Public Records Act shall not be posted.

- At times, authorized users may determine other means/tools are more appropriate ways to respond to citizen comment or may determine that it is best not to respond to a comment at all.

- In general, individual complaints, concerns, or service requests maynot be addressed via social media.

- Authorized users shall not engage in back-and-forth conversation regarding topics that are complex, controversial, or otherwise sensitive.

- Authorized users, in consultation with the Town Manager or designee, will determine when an issue raised by others has reached a stage that requires a Town response on the account.

- A standard reply may be used to direct users with concerns related to sensitive or complex issues. This standard reply shall be substantially similar to the following:

  > The Town of Belleair is very interested in the insights and concerns expressed here. However, complex topics typically are not effectively discussed in forums such as this. If you wish to voice your concerns further or obtain additional information, please attend a Town Commission meeting to address your concern.

<u>Guidelines and Limitations for all Users</u>

- All Town employees, including authorized users of the Town's social media accounts, and Town officials shall govern themselves in a professional manner that reflects positively on the Town when using social media. Users should always focus on providing high-quality customer service and worthwhile information in a timely manner.

- The conversation shall always remain civil and respectful and all authorized users, employees, and Town officials must refrain from using content in violation of this policy.

- Inaccurate information posted by non-employees may be addressed and corrected, on a factual basis only.

- Repeated violations of this policy shall result in removal of access to the service and be grounds for disciplinary action for Town employees.

- Town of Belleair social media accounts are not monitored for emergency communication. To report an emergency, please call 911.

- This Social Media Policy shall be revised by the Town Commission as needed. Posts/comments to the Town's social media accounts shall constitute acceptance of this policy.

Last revised October 2025