

**CITY OF KENOSHA  
INTERNET MEDIA POLICY**

**I. POLICY**

Internet media communication tools facilitate interactive information sharing, interoperability, and collaboration. Commonly referred to as “social media” web sites, such as Facebook©, Twitter©, MySpace™, YouTube©, Flickr®, Blogger, and LinkedIn®, have large user bases and are, thus, increasingly useful outreach and communication tools for local governments. However, City of Kenosha social networks and personal social networks of employees and affiliates, must be kept separate at all times.

**II. PURPOSE**

The purpose of this policy is to establish guidelines for Covered Personnel concerning conduct for City Networking/Websites and Personal Networking/Websites.

**III. DEFINITIONS**

- A. Blog** – A blog (short for web-log) is a personal outline journal, irrespective of length, that is frequently updated and intended for general public consumption. Blogs generally represent the personality and opinion of the author or reflect the purpose and opinion of the website that hosts the blogs. Blogs may also contain links to other web sites the author favors that support or reject a point being made on a post.
- B. Chat Room** – A way of communicating by sending text messages to people in the same chat room in real-time. The term can mean any technology ranging from real-time online chat over instant messaging and online forums to fully immersive graphical social environments.
- C. Covered Personnel** - “Covered Personnel” shall include any City officer or employee (but shall specifically exclude any elected official), whether appointed, paid or unpaid, full or part time, any member of any City Board, Committee, Commission or Authority, any approved volunteer, and any employee of the Library, Museum, Housing Authority, Water Utility and Storm Water Utility. Covered personnel shall also mean, for purposes of §30.06 F. Code of General Ordinances – City of Kenosha, a former employee.
- D. City Networking/Websites** - “City Networking/Website” shall include any blog, chat room, forum, social networking site and/or website, under the direction and control of the City of Kenosha, including all City departments, any City Board, Committee, Commission or Authority, as well as the Library, Museum, Housing Authority, Water Utility and Storm Water Utility.
- E. Forum** – An online discussion group where users can post comments and thoughts, either anonymously or with personal identity.

- F. Personal Networking/Websites** – any blog, chat room, forum, social networking site and/or website created or configured by an individual for individual, social, or entertainment purposes.
- G. Social Networking Site** – A website or service that enables users to create public profiles within that website and form relationships with other users of the same website. Social networking sites can be used to describe community-based websites, online discussions forums, chat rooms and other social spaces online.
- H. URL** – Abbreviation of Uniform Resource Locator, the global address of documents and other resources on the World Wide Web. For example, <http://www.google.com> is the URL for Google.com. It is the address where the website Google can be found.
- I. Website** – Any computerized document, file, or menu accessible on the Internet and/or World Wide Web.

#### **IV. ACCEPTABLE USE**

All City Networking/Websites shall be operated in conformance with, and be consistent with applicable state, federal, and local laws, regulations, and policies including all information technology security policies. This includes any applicable records retention time periods.

##### **A. SEPARATE PERSONAL AND PROFESSIONAL ACCOUNTS**

Covered Personnel shall not blur or combine their personal and professional lives when operating City Networking/Websites or Personal Networking/Websites.

##### **B. PERSONAL USE**

Covered Personnel are allowed to have Personal Networking/Websites. These sites must remain personal in nature and be used to share personal opinions or non-work related information. The Covered Person must maintain a distinction between sharing personal and official City views. In addition, Covered Personnel should never use their City e-mail account or password in conjunction with Personal Networking/Websites.

1. When operating your Personal Networking/Websites, prominently display a disclaimer on the homepage that states: “The opinions expressed on this site are the views of the author alone as well as those of anyone who may post to the site.” Use this statement to ensure that your stated views and opinions are understood to be your own and not those of the City. A disclaimer is required when you:
  - i. refer to the work done by the City;
  - ii. comment on any City related or issues; or
  - iii. provide a link to a City website.
2. Covered Personnel are responsible for the purposeful or inadvertent disclosure of any confidential information or information that violates the privacy rights or other rights of a third party.

3. The City is free to view and monitor any Covered Personnel's Personal Networking/Websites at any time without consent or prior approval. If the City, in its own discretion, determines that a Covered Personnel's Personal Networking/Website is violating the terms-of-service of a specific media site that the City is monitoring, it may petition to the Administrator and/or Host of the site to remove any non-conforming information.
4. Covered Personnel are prohibited from making statements about the City or any other Covered Personnel that would be considered harassing, threatening, libelous or defamatory.
5. All postings on any Covered Personnel's Personal Networking/Websites are subject to all municipal codes and ordinances as well as all employment rules.
6. Covered Personnel found violating any part of this Internet Media Policy are subject to discipline, up to and including termination.

### **C. PROFESSIONAL USE**

All City-related communication through internet media outlets should remain professional in nature and should always be conducted in accordance with the organization's communications policies, practices, and expectations. Covered Personnel must not use internet networking sites for political purposes, to conduct private commercial transactions, or to engage in private business activities. Covered Personnel should be mindful that inappropriate usage of City Networking/Websites can be grounds for disciplinary action up to and including termination. All City Networking/Websites are subject to these best practices guidelines:

#### **1. Respect:**

You are required to:

- i. Be respectful of all individuals and communities with which you interact online;
- ii. Be polite and respectful of other opinions, even in times of heated discussion and debate;
- iii. Adhere to the Terms of Use, and seek to conform to the cultural and behavioral norms, of the internet media platform being used; and
- iv. Respect registered trademarks, privacy, financial disclosure and other applicable laws when publishing on social media platforms. Check with your supervisor if you are not certain about what you can reproduce or disclose on social media platforms.

## **2. Be Clear As To Identity:**

When creating internet media accounts that require individual identification, Covered Personnel should use their actual name, not pseudonyms. Any employee using his or her name as part of a “City” application of social media should be mindful of the following:

- i. Do not assume privacy. Only post information that you are authorized to disclose.
- ii. Use different passwords for different accounts (both social media and existing work accounts). Using the same password for all accounts increases the vulnerability of the accounts being compromised.

## **V. APPROVAL PROCESS**

City Networking/Websites should make clear that they are representative of the City and that the site follows the City's Internet Media Policy. Wherever possible, City internet media sites should link back to the official City website for forms, documents, online services and other information necessary to conduct business with the City.

Covered Personnel which wishes to install a City Networking/Website shall submit a request, in writing, to the Department Head and/or Manager responsible for that specific department, group and/or organization. An application form is available for this purpose on the City Intranet site (a copy is also attached to this policy for illustration). Each request shall contain information about which specific internet media site(s) will be used, the intended audience, and general goals of establishing the site. The application will identify the staff or volunteer(s) who will be responsible for creating and overseeing the social media site, and acknowledgment of the City's Internet Media policy. All City Networking/Websites shall display a contact individual responsible for maintaining and/or administering the site as well as a method to contact this individual. (Note: City Networking/Websites set up for the purpose of assisting Law Enforcement for criminal investigation work is exempt from this requirement.) Each site administrator shall be responsible for monitoring the City Networking/Website for conforming to the City's Internet Media Policy.

The Department Head and/or Manager will play an active role in the implementation and regulation of all City Networking/Websites under their area of responsibility as well as having the ultimate responsibility for adhering to all terms and conditions of the City's Internet Media Policy.

If the request is approved, the site administrator must submit the IP address of the City Networking/Website, as well as all login and password information to the City Information Technology Director or his/her designee.

## **VI. BRANDING**

City Networking/Websites should make clear that they are maintained by a department, group and/or organization of the City and that they follow the City's Internet Media Policy. Wherever possible, City Networking/Websites should link back to the official City website for forms, documents, online services

and other information necessary to conduct business with the City.

City Networking/Websites shall be branded, as practical, in order to communicate a clear association with the City. Clear association includes, but is not limited to, the display of the City Web logo, department/agency brands, City contact information and a hyperlink, as practical, to the City's official Website, [www.kenosha.org](http://www.kenosha.org).

## **VII. TERMS OF SERVICE**

Covered Personnel should be aware of the Terms of Service (TOS) of the particular form of media. Each form of internet "social" media has its own unique TOS that regulate how users interact using that particular form of media. Any person using a form of social media on behalf of the City should consult the most current TOS in order to avoid violations. If the TOS contradict the City's Internet Media policy, then a decision must be made about whether use of such media is appropriate. The Department Head and/or Manager responsible for the proposed City Networking/Website who's TOS may conflict with the City's Internet Media Policy shall meet with City Administration in order to determine the appropriateness of the site.

## **VIII. CONTENT OF POSTS AND COMMENTS**

Covered Personnel using City Networking/Websites to communicate on behalf of the City should be mindful that any statements made are on behalf of the City; therefore, Covered Personnel should use discretion before posting or commenting. Once these comments or posts are made they can be seen by anyone and may not be able to be "taken back." Consequently, communication should include no form of profanity, obscenity, sexual content, discrimination, statements that may compromise public safety, or registered trademark violations. Likewise, confidential or non-public information should not be shared. Covered Personnel should always consider whether it is appropriate to post an opinion, commit oneself or the City to a course of action, or discuss areas outside of one's expertise. If there is any question or hesitation regarding the content of a potential comment or post, it is better not to post. There should be great care given to screening any social media communication made on behalf of the City as improper posting and use of social medial tools can result in disciplinary action.

City departments, groups and/or organizations, who have received authorization to host a City Networking/Website, are responsible for managing and maintaining its content. Departments shall monitor their sites for comments requesting responses from the City and for comments in violation of this policy. The City reserves the right to restrict or remove any content that is deemed in violation of this Internet Media policy or any applicable law or regulation.

## **IX. POSTS AND COMMENTS ARE PUBLIC RECORDS**

Like e-mail, communication via City Networking/Websites is a public record. This means that both the posts of the site administrator and any feedback by other employees or non-employees, including citizens, will become part of the public record.

- A. Because others might not be aware of the public records law, local governments should include the following statement (or some version of it) somewhere on the social networking Web site:

## **PUBLIC RECORD NOTICE**

City Networking/Websites are subject to the Freedom of Information Act and Wisconsin Public Records Law. Any content maintained in a social media format that is related to City business, including a list of subscribers, posted communication, and communication submitted for posting, may be a public record subject to public disclosure.

- B. All comments or posts made to local government account walls or pages are public, not private.
- C. Covered Personnel who receive messages through the private message service offered by some social media sites should encourage users to contact them at a public e-mail address maintained by the City. For private messages that Covered Personnel do receive, they should be treated as work related e-mails and therefore, as public records.
- D. Site Administrators should set all privacy settings to public (except site management controls).

## **X. SECURITY**

From a security standpoint, you should be mindful of how to best prevent fraud or unauthorized access to the City Networking/Website. In almost every case where an attacker accesses a system without authorization, they do so with the intent to cause harm. In order to minimize the possibility of a security breach, the site administrator must:

- A. Ensure that they are aware of which information to share, with whom they can share it, and what not to share;
- B. Attend security awareness and training to educate users about the risks of information disclosure when using social media, and make them aware of various attack mechanisms; and
- C. Ensure that they are aware of Privacy Act requirements and restrictions. Educate users about social networking usage policies and privacy controls to help them better control their own privacy in any profile they use for work-related activities and more effectively protect against inadvertent disclosure of sensitive City information.

## **XI. RECORDS MANAGEMENT AND PRESERVATION**

Communication through City Networking/Websites is considered a public record. All City Networking/Websites shall adhere to applicable state, federal and local laws, regulations and policies, including all Information Technology and Records Management policies of the City, as well as other applicable City policies. Freedom of Information Act and the Wisconsin Public Records Law apply to social media content and therefore, must be able to be managed, stored and retrieved to comply with these laws.

City Site Administrators must assume responsibility for public records and comply with the record management policies of the City.

## **XII. BREACH OF POLICY**

Failure to comply with this Policy may result in disciplinary action. This disciplinary action may involve a verbal or written warning or, in serious cases, termination of your employment, or termination from your position.

**City of Kenosha  
Internet Media Policy  
Acknowledgment of Receipt**

This is to acknowledge that I have received a copy of the City of Kenosha Internet Media Policy.  
I have read, received and will abide by the City of Kenosha Internet Media Policy.

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Name (printed)

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Signature

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Date signed

(After this page has been signed and dated, detach and return this page to the City of Kenosha Human Resources Department where it is will be retained in your personnel file. Employees should keep their copy of this policy with their other employment information for further reference.)