

# Flathead County Communications Policy and Procedures

## Purpose

The purpose of this policy is to establish guidelines, procedures, and requirements for providing internal and external respectful and responsive communication in accordance with the approved Core Values of Flathead County.

## Scope

This policy applies to all Flathead County employees, contractors, volunteers, consultants, vendors, boards, committees and agencies who engage with internal or external communications on behalf of the county.

## Limitations

External communications with the media should have a public purpose and serve public interest. Policies apply to all Flathead County employees' while they are at work and are therefore representatives of their employer. Employees should refer to the State Code of Ethics when speaking as an individual citizen outside their employment or professional capacity with Flathead County to ensure their rights and responsibilities are clear.

Elected Officials are unique and reserve the right to communicate independently of these guidelines. Elected Officials are invited and encouraged to use this policy to guide their external and internal communication efforts.

## Administration

Department heads and Elected Officials are responsible for policy implementation within their departments and employee compliance with the policy. All non-elected Flathead County employees represent Flathead County when speaking to the media in their professional capacity. Department heads are asked to consider these guidelines in an effort to ensure coordinated County-wide communications and accurate public information.

## **POLICY GUIDELINES**

### **1. COMMUNICATIONS WITH MEDIA SOURCES**

#### Definitions

**Media** – a term that refers to all individuals and organizations who maintain print, broadcast or digital communication vehicles for public consumption. This definition includes newspapers, magazines, television, blogs, digital news sites and other vehicles.

News Note
If an outlet is unknown or unfamiliar to a County department or employee, the Public Information Officer will assist to determine the credibility and validity of the media outlet.

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**Routine Media Request** – a request for information about the County that is readily available and non-controversial. Examples include: general information about public events, meetings, public projects, or County programs or services.

**Non-Routine Media Request** – a request that requires some preparation before a response is issued. Examples include: an interpretation of policy, a request for employment records for a County employee, a public records request that may involve litigation, an inquiry about a high-profile project or event, or a response to a public emergency or disaster.

## General Procedures for Communications with the Media

**Media Inquiry Process:** At a minimum, a county employee and/or Elected Official will acknowledge the request and provide an estimate of when a response will be forthcoming. It is appropriate for either a department administrative staff member or the Public Information Officer to return this call. It is the responsibility of the County employee contacted by the media to respond appropriately once prepared and available for interview.

News Note
News organizations are driven by a competitive nature to be “first”. While a media deadline is important and should be noted – it should not preclude from gathering and verifying facts. Take the time to get it right.

**Staff Member:** In order to properly coordinate across departments and inform the Board of County Commissioners, with the exception of routine media requests, media inquiries received by County staff should be referred to the department head and the Public Information Officer along with the reporter’s name, phone number, topic of story and deadline as soon as possible. The staff member receiving the inquiry should inform the media representative that the department head or the Public Information Officer will respond as soon as he/she is available. The Public Information Officer should be notified about routine and non-routine media inquiries following the request. Non-routine media requests should be discussed with the Public Information Officer prior to response to ensure an enterprise-wide response is provided. Oftentimes, more than one County department is approached by the media for a story. By briefing the Public Information Officer of interview requests, staff can better facilitate media interactions across departments. This ensures the County communicates a thorough message to the public.

As even seemingly routine media requests may be used to contribute to a larger story that may become controversial, it is important that the Public Information Officer be informed each time there is a contact from a media representative. An email to that effect will suffice.

The Public Information Officer can sit in on any interview to provide support and feedback. County staff should also be aware that when they present an item at a commissioners’ public meeting, what they say during that meeting may be quoted in the media. Media may or may not follow up with the staff member, depending on whether they have additional questions.

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## County Spokespersons

In most cases, there will be one spokesperson designated to respond to each media inquiry. A County Commissioner, Elected Official or the County Administrator will likely be the spokesperson for County-wide issues and a department head for department-level issues. The Public Information Officer is available to assist in coordinating a timely, accurate and thorough response.

Exceptions regarding departmental spokespersons may be made at the discretion of the department head.

News Note
<p><b>Preparation:</b> Taking the time to prepare for an in-depth interview can be difficult, especially on short notice. However, the more time you can give to a reporter to answer his/her questions increases the likelihood that information will be accurate and in the appropriate context. The PIO can help you prepare for an interview.</p>

## Sensitive or Controversial Issues

Because sensitive or controversial issues have the potential to consume the most time providing accurate and thorough information, the Public Information Officer should be notified immediately when a sensitive or controversial issue is identified or when an emergency situation occurs so that a response can be prepared as soon as possible. County staff should not wait until there is media interest before contacting the Public Information Officer. In an emergent situation (i.e., fire, flood, earthquake or other emerging incident) the Flathead County Board of Commissioners, County Administrative Officer, or Flathead County Sheriff will communicate with the Public Information Officer and other appropriate elected officials and/or staff.

Sensitive or controversial issues may include but are not limited to:

- Existing or potential threats to public safety, welfare or property;
- Legal claims or lawsuits filed against Flathead County or any of its employees or agents;
- Issues that may affect the County's public image, public trust, or citizen confidence.

Sensitive and controversial issues of interest to the media may be best assessed by asking the following:

- Is the issue a threat, existing or potential, to life, health or property?
- Could a negative interpretation of the issue affect public confidence in, or opinion of, Flathead County government and/or its departments?
- Is the issue of particular interest to the general public?
- Are there legal ramifications, existing or potential, raised by the issue?
- Has more than one member of the media inquired about the same issue?
- Has someone threatened to go to the media about the issue?
- Is there unusual interest by a person or small group of people about a seemingly routine issue?

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## **Legal Issues**

Inquiries regarding pending litigation, exposure to litigation or settled litigation should be referred to the County Attorney, the County Administrator, the Public Information Officer, or the person designated to speak on behalf of the issue.

## **Personnel Issues**

Inquiries regarding personnel-related information should be referred to the Human Resources Department (HR). The Public Information Officer can coordinate an appropriate response with the County Administrator and the HR Director. Staff members, under no circumstances, should discuss personnel issues with the media.

## **Public Safety Issues**

During a major emergency (i.e., severe weather, wildfire, etc.), the procedure for handling the media is contained in the County's Emergency Operations Plan. Depending on the nature of the emergency, the Public Information Officer could be a representative of the Sheriff's Office, the Office of Emergency Management, the Health Department, or the Commissioners' Office. Because the Sheriff's Office and Emergency Management Department operate on a 24/7 schedule and their work generates a high volume of media calls, those departments have designated personnel as media spokespersons for routine public safety issues and follow specific guidelines when releasing information.

## **Financial or Tax Issues**

Inquiries regarding Flathead County finance or tax should be referred to the County Administrative Officer, Finance Director, and/or the Treasurer. The Public Information Officer can coordinate a response.

## **Digital and Social Media**

Content generated from unknown bloggers, other editors of social media sites, or digital news sites should be directed to the Public Information Officer, who will evaluate the media outlet and determine an appropriate response.

## **Errors in Reporting**

Errors in reporting should be brought to the attention of the Public Information Officer, who will coordinate a correction with the designated media outlet, if appropriate.

## **County-initiated Communications**

The Public Information Officer, when directed, will proactively contact the media. This includes issuing news releases and media advisories and personal contacts with reporters, editors, and bloggers. Departments seeking publicity for events or activities should request assistance from the Public Information Officer at least two weeks in advance of the date of desired media coverage, unless emergency work or last minute changes occur. Departments issuing their own media release are requested to share them with the Public Information Officer.

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Departments should submit requests for communication assistance once a need is identified to ensure that the Public Information Officer has adequate time to coordinate and provide support.

Occasionally, news briefings or news conferences may be held to provide media with in-depth information about an issue or to announce or respond to an issue of significance. The Public Information Officer can schedule and support such media events if desired.

## 2. SOCIAL AND DIGITAL MEDIA

### Definitions

**Social Media** – Websites and applications that enable users to create and share content or to participate in social networking. Often referred to digital media.

**Blog** – A website containing a writer’s or group of writers’ own experiences, observations, opinions, etc., and often having images and links to other websites. The term is an abbreviated form of ‘web log.’

### Policy and Procedures for Social Media

The County encourages and supports the use of social media to further the goals of Flathead County and the missions of its departments, where appropriate, keeping in mind that not all forms of social media may be appropriate for use by County departments.

Information posted to a social media site can add to the public’s understanding of a department or of a specific project. Flathead County communications through social media sites and other digital applications carry the same weight as the County’s official website, and content is maintained with the same level of accuracy, integrity, and timeliness.

The most appropriate uses of social media tools fall into two general categories:

- As channels for disseminating time-sensitive information as quickly as possible (example: emergency information).
- As marketing or promotional channels to increase the County’s ability to broadcast its messages to the widest possible audience.

Wherever appropriate, content posted to Flathead County’s social media sites should contain links directing users back to the County’s official website for in-depth information, forms, documents or online services necessary to conduct business with the County.

Inappropriate use of social media includes, but is not limited to, personal communications; profane language or content; content that promotes or fosters discrimination prohibited under federal and state law; sexual content or links thereto; content regarding private commercial or political activities; and disclosure of confidential or proprietary information. Inappropriate use of social media may be grounds for disciplinary action.

### Site Creation

A department head should advise the Public Information Officer before developing social media tools. Pages and related content must represent the County department, not any individual. The Public Information Officer is available to provide professional and technical assistance.

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News Note
Approved Flathead County social media sites are Facebook, YouTube, Twitter, Instagram and LinkedIn.

## Website

Flathead County's principle website(s) will remain the primary internet presence.

## Social Media Account Security

The Flathead County Information Technology Department is responsible for Administrative support for social media account security. All departments with existing social media accounts are required to set up administrative access with the Information Technology Department. Any new accounts will be set up through the Information Technology Department, which will then grant permissions to the appropriate department staff.

## Social Media Account Archiving

Flathead County Information Technology department will manage the archiving of all Flathead County social media data to meet statutory requirements.

## Site content management

The department head should designate an employee to 'own' authority of the site. Content should be reviewed daily and regularly updated. The department head is ultimately responsible for all site content. The Commissioner's Office may recommend termination of any site to the department head if content is inappropriate, not applicable to the County, serving little to no public purpose or is infrequently updated.

News Note
Social Media sites use complex and proprietary algorithms to help broaden its appeal to users. Frequent posting can expand the reach of the site and contact more users. But too much posting can limit reach. <b>It is generally recommended to post 1 time per day, and no more than 2 times per day.</b> In fact, some studies have even found a drop in engagement if posting more than that. Aim for quality over quantity.

## Employee Commitment

County employees are obligated to be aware of and comply with the Flathead County Electronic Communications Policy and the applicable provisions of Flathead County Human Resources Policies. Before engaging in any activity involving social media, the designated 'owner' of the department's site should read "Social Media Guidelines Use" form and confirm their review of the guidelines with their department head.

## User Interaction and Comments Policy

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County-created social media postings allowing comments must be structured to focus discussions on County services and programs. Because Flathead County is a public agency subject to the First Amendment, we are limited in our ability to moderate or delete comments from the public, even those considered vulgar, disrespectful or otherwise inappropriate. Any County-affiliated social media site that allows comments should include the following advisory:

*“The purpose of this site is to present matters of public interest to Flathead County, including its many residents, businesses and visitors. We encourage you to submit your questions, comments and concerns in a respectful manner. Please note that as a public agency subject to the First Amendment, Flathead County is limited in its ability to moderate or delete comments in a public forum. This includes comments that some may deem vulgar, disrespectful or otherwise inappropriate. Comments and communications may be subject to the terms of service of the service provider, which is beyond County control.”*

Generally, only comments with obscenity and direct actionable threats are subject to removal. If staff believe a comment meets this threshold, they must consult with the County Attorney’s Office before removing it.

If staff encounter a comment that does not reflect the County’s values but the County Attorney’s Office determines it cannot be removed, staff are encouraged to add to (edit) the original post and/or reply to the comment with the following language:

*“EDIT: Comments on this post do not reflect the viewpoint or values of Flathead County. As a public agency subject to the First Amendment, Flathead County is limited in its ability to moderate or delete comments in a public forum.”*

Departments shall monitor public comments and take prompt corrective action when an issue arises that challenges the accuracy of County information or questions County operations or services. Best practice is to leave the comment published and respond with accurate information.

### **Mistakes**

County-generated information containing misinformation or factual errors shall be corrected as soon as the mistakes are identified, and remedial action should be taken as appropriate to the situation. It is recommended that information is not deleted, but rather reposted correctly, noting the correction. Even if a post has been deleted from a social media platform, it has not truly been erased. The content is still hosted on that server and is often available to the public. If the platform allows posts to be edited, the page manager should also add the correction to the top of the original post. This will ensure that the accurate information is included if users continue to share the original post.

News Note
Deleting and reposting has the tendency to look conspicuous, while correcting an error demonstrates taking responsibility for the error and ensuring accurate information is now being shared. It is recommended that an editor check with the PIO before deleting any official Flathead County social media post.

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## **Public Records**

Public records include those in electronic form according to Montana law (2-6-110, MCA). Communications to or from County personnel through social media are considered public records and may be required to comply with applicable records retention policies.

The department is responsible for responding completely and accurately to any public records requests arising from the social media sites it maintains.

## **3. LOGO AND BRANDING**

To effectively communicate the breadth of programs and services Flathead County provides, the County has adopted a standard logo, for use in official County communications. This includes all printed and digital materials, signage and videos.

To further a clear, consistent and professional identity, departments should use the Flathead County seal. This includes use of the provided templates for letterhead, envelopes, business cards and any other printed materials that feature the logo. Departments should update any digital materials, such as email signatures and digital letterhead, with the Seal.

Departments that serve more specific audiences and have developed branding tailored to those audiences can continue to use that branding.

## **4. EMPLOYEES ACTING AS PRIVATE CITIZENS GUIDELINES**

### **Acting as a Private Citizen Generally**

Any contact with the media should not include reference to the employee's position with the County or include a statement such as "I work for the county, but I'm acting as a private citizen." This language publicly acknowledges your role within the community and your words are likely then attributed to the County. Letters to the editor should not be prepared on County time, printed on County letterhead, mailed at County expense, or emailed from a County email address. Telephone contact with reporters outside of County professional capacity must not be made on County time using County telephones. Calls to radio talk shows shall not be made on County time using County telephones.

### **Employee Social Media Participation**

Flathead County understands that employees may maintain or contribute to personal blogs, message boards, conversation pages and other forms of social media outside of their job functions and may periodically post information about their jobs or Flathead County's activities on these outlets. If an employee posts Flathead County or job-related information, they should exercise good judgment and abide by Flathead County policies.

Personal participation on external media platforms should not use Flathead County's name as part of any online identity (i.e., username, "handle" or screen name), nor should they speak as a representative of the County.