



# Social Media Use Policy

Policy # WF020  
Effective:

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Policy Owner: Director, Office of Communications and Public Engagement

Policy Contact: Social Media Coordinator

## Policy Statement

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The policy outlines the Minnesota Department of Transportation's (MnDOT) authority over official social media accounts, provides guidelines for engagement to anyone who chooses to communicate with official MnDOT social media accounts, and establishes guidance for employee use of personal social media accounts.

### ***Establishing MnDOT social media accounts***

MnDOT employees are prohibited from establishing MnDOT accounts on social media platforms unless specifically authorized by MnDOT's Director of Communications and Public Engagement. Content posted by MnDOT must comply with [MnDOT Social Media Account Standards](#).

MnDOT accounts may "follow", "like", "subscribe", "connect" or otherwise associate with other accounts such as fellow MnDOT, state agency, and federal accounts. Associations with other accounts do not constitute an endorsement.

### ***Posting on MnDOT social media accounts***

MnDOT social media accounts are limited public forums. This policy establishes the [Social Media Community Rules](#) that provide guidelines for engagement to anyone who chooses to communicate on or with official MnDOT social media accounts.

### ***Employees' use of personal social media accounts***

Comments posted by employees that impede the services provided by MnDOT, disrupt MnDOT's workforce or operations, interfere with important working relationships, or negatively impact the ability of MnDOT to carry out its mission, may result in discipline, up to and including discharge.

Nothing in this policy shall prohibit or infringe on speech or expression that is protected by law. Each situation will be evaluated on a case-by-case basis.

## Reason for Policy

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MnDOT uses social media to conduct state business by communicating with and delivering messages directly to the public and encouraging citizen involvement, interaction and feedback. MnDOT social media content will not serve as a replacement for postings, notifications, and public hearings as required by law or agency policies. The

Office of Communications and Public Engagement owns MnDOT social media accounts. This policy exists to ensure that MnDOT's content on social media platforms is accurate, consistent with MnDOT communications strategies, and adheres to [MnDOT Social Media Account Standards](#).

The policy communicates the [Community Rules](#) that apply to comments, questions, and messages on or directed at MnDOT social media accounts. The policy also communicates the requirements regarding the use of social media and informs employees of acceptable conduct when interacting on social media, including on personal social media accounts.

Official MnDOT social media accounts are subject to state and federal laws and agency policies.

## Applicability

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All MnDOT employees must comply with MnDOT policies.

Key stakeholders affected by this policy include:

- Office of Communications and Public Engagement
- Office of Human Resources
- Office of Equity and Diversity
- Office of Chief Counsel
- Managers and Supervisors
- Office Directors/District Engineers
- MnDOT Employees

## Definitions

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### **Content**

Posts, writings, material, documents, photographs, graphics, videos, links, or any information that is created, posted, distributed, or transmitted on a social media platform.

### **Official Social Media Account\***

An official, MnDOT-created presence on a third-party social media platform.

### **Not Public Data**

Any data collected, created, maintained or disseminated by a state agency which has a classification other than public. Not public data include data that are private, confidential, nonpublic, or protected nonpublic data as those terms are defined in the Minnesota Government Data Practices Act, [Minn. Stat. §13.02](#).

### **Personal Social Media Account**

A social media account that is solely for personal use.

### **Social Media Platform\***

An external, third-party website or mobile application that focuses on building an online community of people. Examples include, but are not limited to, Facebook, Twitter, Instagram, and LinkedIn.

\*Note: MnDOT does not own any social media platforms but manages its official accounts on the platforms. MnDOT has a limited ability to change settings offered by the platform. MnDOT accounts may be terminated by the platform provider at any time.

## Responsibilities

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### Office of Communications and Public Engagement

- Manage implementation of MnDOT's social media strategy.
- Ensure that MnDOT's social media accounts are monitored during regular business hours. Employees may post content at other times to coincide with events, or as unusual or emergency circumstances dictate.
- Maintain content and respond to comments on MnDOT social media accounts.
- Monitor and enforce [MnDOT Social Media Community Rules](#) across all MnDOT social media accounts.
- Approve the creation of MnDOT accounts on social media platforms.
- Upon termination of employment, remove an employee's administrative access to all MnDOT social media accounts.
- Approve staff and contracted suppliers to act on MnDOT's behalf in posting and responding on social media accounts.
- Oversee the work of other MnDOT offices who are approved to post content on approved social media accounts.
- Deactivate or terminate accounts no longer in use or on social media platforms that offer little benefit to MnDOT communication goals. Accounts may also be terminated at the discretion of the Director of Communications and Public Engagement.
- Maintain and update the [MnDOT Social Media Community Rules](#) and [MnDOT Social Media Account Standards](#) as necessary.
- Develop and provide social media training and education to all employees in collaboration with the Office of Human Resources.
- Report possible policy violations to the Office of Human Resources and/or the Office of Equity and Diversity for review and action.
- Work with the Office of Chief Counsel to ensure compliance with the policy, including records retention.

### Managers and Supervisors

- Ensure all employees complete relevant training and are aware of this policy.
- Document and take timely and appropriate action when a complaint is made alleging violations of this policy and cooperate with the Office of Human Resources and/or the Office of Equity and Diversity in the investigation process.

### Office of Human Resources and Office of Equity and Diversity

- When appropriate, consult and conduct investigations of an employee's social media activity.
- Consult and coach employees, supervisors, and managers on the appropriate course of action for violations.
- Consult with the Office of Chief Counsel on legal issues that arise as a result of policy violations, including those involving First Amendment questions. The Office of Equity and Diversity may also consult with counsel from Minnesota Management and Budget (MMB) or the Attorney General's Office directly,

but any high profile matters or matters likely to result in litigation must be brought to the attention of the Chief Counsel.

- Consult with the Office of Audit on audit issues that arise as a result of policy violations.

#### **Office of Chief Counsel**

- Advise the Office of Communications and Public Engagement of statutes, regulations, and case law requiring modification to the policy or procedures.
- Advise the Office of Human Resources and Office of Equity and Diversity of statutes, regulations, and case law needed to interpret the policy, including questions involving the First Amendment, and determine if the policy has been violated.
- Consult with Minnesota Management and Budget (MMB) and the Office of Attorney General as needed or when litigation is likely.
- Alert appropriate personnel when records need to be preserved for litigation.

#### **Office Directors/District Engineers**

- Authorize employees in their respective areas to request approval from the Office of Communications and Public Engagement to post content to official MnDOT social media accounts.

#### **Policy Owner (Director, Office of Communications and Public Engagement)**

- Review the policy every year, or sooner as needed, to ensure policy remains up-to-date.
- Ensure that procedures, forms, resources, and training associated with the policy remain current.
- Work with the Policy Coordinator to revise the policy and/or confirm its accuracy.
- Communicate policy revisions, reviews, and retirements to stakeholders.

#### **Employee Personal Social Media Use**

##### ***Conduct***

- Employees must not engage in behavior that would adversely affect their work, job duties or ability to function in their position, disrupt the work environment, or negatively impact the ability of MnDOT to carry out its mission. If an employee engages in such behavior, **even if it is not during work time or is on a personal device**, personal social media use may become the basis for discipline.
- Do not use personal social media to speak on behalf of the agency, or to indicate you are representing the interests of the agency.
- Avoid inappropriate or excessive use of social media while at work.
- Employees agree to follow [MnDOT's Social Media Community Rules](#) when interacting on or with official MnDOT social media accounts.
- Report questionable social media use to your supervisor, the Office of Human Resources, or with the [Report Wrongdoing / Questionable Activity Form](#).

##### ***Identification***

- Do not use your state email address to create or use personal social media accounts, unless it is required to administer MnDOT social media accounts.
- Do not use the MnDOT logo or any of its variations as a personal profile photo.
- Do not use any MnDOT website URL (e.g. "mndot.gov" or "dot.state.mn.us") in the biography portion of a personal social media account, or where it could be perceived as an official MnDOT social media account.

- Never conduct official business through a personal social media account.  
Example: an employee may not correspond with a consultant about MnDOT business through their personal social media account.
- Employees must wait until MnDOT information meant for public consumption is officially published by MnDOT for its intended business purpose before posting it to their personal account.
- Employees play a role in ensuring the accuracy of MnDOT social media accounts. These accounts are closely monitored, so if an employee sees unanswered questions, communications staff are likely working on a response. However, if an employee finds misinformation on an official MnDOT site, such as inaccurate posts or comments that could mislead the public, the employee should alert communications staff by sending an email to: [socialmedia.DOT@state.mn.us](mailto:socialmedia.DOT@state.mn.us).

### **Content**

- Comments posted must not:
  - impede the services provided by MnDOT;
  - disrupt MnDOT's workforce or operations;
  - interfere with important working relationships; or
  - negatively impact the ability of MnDOT to carry out its mission.
- Be aware that regardless of intent, personal social media use may be perceived as expressing the agency's position or representing the agency as a whole.
- Have limited expectation of privacy on social media platforms, regardless of privacy settings. Private communications posted on the Internet can easily become public.
- Do not post data that is not public on social media.
- Ensure that MnDOT documents or information visible in the background of a photo does not contain not public data.

### **Official MnDOT Social Media Use by Authorized Employees**

- Do not establish MnDOT social media accounts, unless authorized by the Director of Communications and Public Engagement.
- Do not post not public data on social media.
- Comply with [MnDOT Social Media Account Standards](#).

## **Resources & Related Information**

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### **Forms**

- [Report Wrongdoing / Questionable Activity Form](#)

### **Processes, Procedures, and Instructions**

- [State of Minnesota Branding](#)
- [MnDOT Social Media Community Rules](#)
- [MnDOT Social Media Account Standards](#)

### **Resources**

- [Appropriate Use of Electronic Communication and Technology Policy](#)
- [Code of Ethics](#)
- [Violence-Free and Respectful Workplace Policy](#)
- [Sexual Harassment Prohibited Policy](#)

- [Other relevant MnDOT policies](#)
- Business Data Catalog (BDC) – accessible from employee Intranet

## History & Updates

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Title: *Social Media Use Policy*

<b>Revision</b>	<b>Date</b>	<b>Comments</b>
Initial Adoption	3-9-2020	Policy #HR020 adopted Note: Due to the COVID-19 pandemic, the policy was signed but was never implemented (i.e. posted and communicated).
1 <sup>st</sup> Revision		Clarify responsibilities of Office of Chief Counsel and Office of Equity and Diversity. Renumber as #WF020. Post and communicate policy.
2 <sup>nd</sup> Revision		
3 <sup>rd</sup> Revision		

## Authorization

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### Policy Owner:

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

**Governance Committee** has reviewed this policy and recommends approval:

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

### Responsible Senior Officers:

Signature: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

## Policy Review

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This policy has been reviewed by the Policy Owner, the policy content is current, and no significant modifications are needed. Minor modifications have been noted in the "Comments" section.

Date	Policy Owner Signature	Comments