



# TOWN OF NANTUCKET

## *Board of Selectmen*

### SOCIAL MEDIA POLICY

*Adopted: January 9, 2013*

*Effective: January 9, 2013*

*Applicability: All Town and County Departments*

#### ***I. Purpose***

This policy sets forth general guidelines that must be adhered to with respect to utilization of social media sites for official Town of Nantucket (“Town”) purposes. Questions regarding this Policy must be directed to Town Administration. These guidelines may be supplemented by more specific administrative procedures and rules as may be issued or required by Town Administration or designated authorities. This Policy may be amended from time to time, and is meant to be read in conjunction with all other applicable policies and procedures of the Town of Nantucket.

#### ***II. Definitions***

1. “Social media” refers to websites that facilitate user participation, networking, cloud based platforms, and collaboration through the submission of user-generated content. Social media in general includes tools such as blogs, wikis, Twitter (microblogging sites), Facebook and LinkedIn (social networking sites), YouTube (video sharing sites) and Del.icio.us (bookmarking sites).
2. “Social media identity” or “User identification” or “Account” or “username” is a specific user identity or account that has been officially registered and recognized on a third party social media site.
3. “Blog” is an abridgement of the term web log and is a website with regular entries of commentary, descriptions of events, or other material such as graphics or video.
4. “Moderator” or “Webmaster” is an authorized Town official, employee or designee who reviews, authorizes and allows content submitted by Town officials, employees and the public to be posted to an official Town social media site.

## Town of Nantucket Social Media Policy

### **III. Policy**

1. All Town social media sites shall be:
  - a. Approved by Town Administration or its designee; and
  - b. Published using social media platform and tools approved by the Town's Information Technology Department ("IT").
2. Official postings for the Town will be done by Town Administration, or its designee(s).
3. The Town reserves the right to restrict or remove any content that is deemed in violation of this Policy, any applicable law or regulation, or anything that Town Administration deems inappropriate.
4. All social media sites and entries shall clearly indicate that any content posted or submitted is subject to public disclosure.
5. All social media sites shall clearly indicate they are maintained by the Town and shall have the Town's contact information prominently displayed.
6. Each Town social media site shall include an introductory statement, which clearly specifies the purpose and topical scope of the blog/social media/social networking site. Where possible, social media sites should link back to the official Town Internet site ([www.nantucket-ma.gov](http://www.nantucket-ma.gov)) for forms, documents and other official information.
7. Each Town social media site shall indicate to users that the site is subject to a third party's website Terms of Service. Furthermore, each Town social media site shall indicate that:

*[The social media site provider] could collect personal information through the user's use of the social media site; and that this personal information may be disseminated by the third party; and that such dissemination may not be governed or limited by any state, federal or local law or policy applicable to the Town of Nantucket.*
8. Departments have the option of allowing employees to participate in existing social media sites as part of their job duties, or allowing employees to create social media sites as part of their job duties subject to Town Administration approval. Cabinet Chiefs may allow or disallow employee participation in any social media activities in their departments.
9. All Town social media sites shall adhere to applicable state, federal and local laws, regulations and policies including the Public Records Law, Public Records Retention Schedules, Open Meeting Law, Copyright Law and other applicable Town policies.
10. Public Records Law and e-Discovery laws and policies apply to social media content. Accordingly, such content must be able to be managed, stored and retrieved to comply

## Town of Nantucket Social Media Policy

with these laws. Furthermore, once such content is posted on a social media site, it should stay posted, unless it is removed because it is deemed in violation of the Policy or any applicable law or regulation.

11. The Town's social media content and comments containing any of the following forms of content are prohibited from posting:
  - a. Comments not topically related to the particular site or blog article being commented upon;
  - b. Profane, obscene, or vulgar language or content;
  - c. Content that promotes, fosters or perpetuates discrimination on the basis of race, color, gender, gender identity, national origin, religion, ancestry, age, sexual orientation, disability, maternity leave, genetic information, or active military status;
  - d. Sexual content or links to sexual content;
  - e. Conduct or encouragement of illegal activity;
  - f. Information that may tend to compromise the safety or security of the public or public systems, or
  - g. Content that violates a legal ownership interest of any other party.
12. All Town social media moderators shall be trained regarding the terms of this Policy, including their responsibilities to review content submitted for posting to ensure compliance with the Policy.
13. Where appropriate, the Town IT security policies shall apply to all social media sites and articles.
14. Officials and employees representing the Town via social media sites must conduct themselves with all applicable rule, regulations, and policies (including personnel policies) of the Town.
15. Town or department social media sites may cite but cannot endorse (either with approval or disapproval) vendors, suppliers, clients, citizens, co-workers, political parties, candidates or other stakeholders.
16. Employees found in violation of this Policy may be subject to disciplinary action, up to and including termination of employment.

### ***IV. Employee Guidelines for Use of Social Media Sites***

1. **Computer Use Policy.** All employees are responsible for understanding and following the Town's Computer Use Policy, in addition to this Policy.
2. **First Amendment Protected Speech.** Although the Town can moderate the social media sites that accept comments from the public, such as wikis and blogs, to restrict speech that is obscene, threatening, discriminatory, harassing, or off topic, employees

## Town of Nantucket Social Media Policy

cannot use the moderation of media sites to restrict free speech with which the employee or the Town merely disagrees. Users have some First Amendment rights in posting content to public social media sites hosted by municipalities. Moderators must respect those rights by posting all comments other than those excluded for specific legitimate reasons, as referenced above.

3. **Copyright Law.** Employees must abide by laws governing copyright and fair use of copyrighted materials owned by others. Employees must never reprint whole articles or publications without first receiving written permission from the publication owner. Never quote more than a short excerpt of someone else's work and, if possible, provide a link to the original.
4. **Protect Confidential Information.** Never post legally protected personal information that you have obtained from the Town (eg. Information that is not public record under the Public Records Law, G.L. c. 66, §10 and G.L. c. 4, §7(26)), or whose dissemination is restricted under applicable federal or state privacy laws or regulations. Ask permission about policies or plans that have not been finalized within the Town, unless you have received explicit permission from Town Administration or your supervisor to post draft policies or plans on the department's or Town's social media sites for public comment.
5. **Consider Your Content.** As informal as social media sites are meant to be, if they are on a government domain or have a government identity, they are official government communications. Social media sites will be sought out by mainstream media – so a great deal of thought needs to go into how you will use the social media in a way that benefits both the Town and the public. Employees should not comment about rumors, political disputes, or personnel issues, for example.
6. **Handling Negative Comments.** Because the purpose of many social media sites, particularly department blogs and wikis, is to get feedback from the public, you should expect that some of the feedback you receive will be negative. Some of the ways to respond to negative comments include:
  - a. Providing accurate information in the spirit of being helpful;
  - b. Respectfully disagreeing;
  - c. Acknowledging that it is possible to hold different point of view.
7. **Respect Your Audience and Your Coworkers.** Do not use ethnic slurs, personal insults, obscenities, or engage in any conduct that would not be acceptable in the workplace. Do not be afraid to be yourself, but do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenity, threats of violence, etc.) but also proper consideration of privacy and of topics that may be considered objectionable or inflammatory – such as party politics or religion. Do not use your department's social media presence to communicate among fellow Town employees. Do not air your personal differences with your fellow Town employees or your personal affiliations on your Town or department's social media sites.

## Town of Nantucket Social Media Policy

8. **Use the Social Media Site of Identity Only to Contribute to your Town or Department's Mission.** When you contribute to your social media site or identity, provide worthwhile information and perspective that contributes to your Town or department's mission of serving the public. Social media sites should be used in a way that contributes to the Town or department's mission by:
  - a. Helping you and your co-workers perform your jobs better;
  - b. Informing citizens about government services and how to access them;
  - c. Making the operations of your department transparent and accessible to the public;
  - d. Creating a forum for the receipt of candid comments from residents about how government can be improved; and
  - e. Encouraging civic engagement.