

**TOWNSHIP OF FERGUSON
PERSONNEL RULES & REGULATIONS**

Subject: Social Media Policy	Date of Adoption: April 20, 2015	Section	Page No.
Employees Affected: All Employees	Date of Revision:	33.0	33.10

FERGUSON TOWNSHIP SOCIAL MEDIA POLICY

I. Definitions

- A. Blog – A self-published diary or commentary on a particular topic that may allow visitors to post responses, reactions, or comments. The term is short for “Web Log.”
- B. Page – The specific portion of a social media website where content is displayed and managed by an individual or individuals with administrator rights.
- C. Social Media – A category of Internet-based resources that integrate user-generated content and user participation. This includes, but is not limited to, social networking sites (Facebook, MySpace), microblogging sites (Twitter, Nixle), photo- and video-sharing sites (Flickr, YouTube), wikis (Wikipedia), blogs, and new sites (Digg, Reddit).
- D. Wiki – Web page(s) that can be edited collaboratively.

II. Purpose

- A. The purpose of this policy is to regulate the usage of Township social media pages to enhance effective and efficient communication services to Township residents. The objective of Township use of social media is to promote better communications, provide greater access to information, foster greater transparency, allow for increased accountability, encourage broader participation, and provide a vehicle for collaborative problem-solving on issues of concern or interest to Township residents.
- B. This policy intends to clearly define the permissions and restrictions that shall be enforced on various users of Township social media pages. These include Township staff, personnel designated to post on behalf of the Township, citizens, interested readers, and elected and appointed officials.
- C. This policy proposes to regulate the behavior of employees of the Township with regard to all social media usage; specifically, to provide guidelines for usage during work hours.
- D. This policy proposes to ensure that all Township use of social media is compliant with applicable federal, state, and local laws. These include, but are not limited to, Freedom of Information Act, Pennsylvania Right-to-Know Law, First Amendment, Pennsylvania Sunshine Act, and any applicable information security policies established by the Township.

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III. Policy

A. The Township has determined that the use of social media can be most effective for disseminating Township communications, such as engagement opportunities; employment announcements; important communications from elected officials; updates from Township authorities, boards, and commissions; and communicating other news and events to subscribers of Township social media accounts.

B. Comment and Posting Policy

- i. While it is recognized that the Township's social media pages are designed primarily as an informative tool for residents and interested readers, responses to Township posts are welcome provided the content of the responses does not violate the provisions of Part III Section B. iii. and iv. of this policy.
- ii. Because the ability of Township staff to respond to comments on social media pages is limited, it is recommended that inquiries made regarding social media posts be delivered via email or by contacting a Township representative directly.
- iii. Comments and responses to Township social media posts shall directly relate to the content of the original posts. Comments and responses that do not directly relate to the content of the original posts shall be promptly deleted.
- iv. Additionally, the Township of Ferguson reserves the right to delete any content that contains:
 1. Vulgar language;
 2. Spam or unauthorized solicitations of any kind;
 3. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability, or sexual orientation;
 4. Promotion of particular services, products, or political organizations;
 5. Copyright or trademark infringement;
 6. Personally identifiable medical information;
 7. Any information that could potentially compromise the safety, security, or proceedings of public systems or any criminal or civil investigations;
 8. Sexual content or links to sexual content; and/or
 9. Content that violates the terms of use of the social medium in which it exists.

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- v. Where possible, social media pages shall clearly indicate they are maintained by the Township and shall have the Township contact information prominently displayed.
- vi. Where possible, social media pages should state that the opinions expressed by visitors to the page(s) do not reflect the opinions of the Township, its staff, or elected or appointed officials.
- vii. Social media pages shall clearly indicated that posted comments will be monitored and that the Township reserves the right to enforce the provisions of Section B. of this policy.
- viii. Social media pages shall clearly indicate that any content posted or submitted for posting is subject to public disclosure.

C. Guidelines for posting to social media websites on behalf of the Township

- i. All posts shall be approved by the Township Manager, Assistant Township Manager, or relevant Department Head.
 - 1. Exception: Approved communications issued via Constant Contact may be posted to social media pages without additional approval of the Township Manager, Assistant Township Manager, or relevant Department Head.
- ii. Social media posts and commentary should, where possible, direct the reader back to the Township's website for more detailed information on the topic.
- iii. Only Township staff designated by the Township Manager shall be permitted to post content on behalf of Ferguson Township.
- iv. Posts shall contain information that is of interests to residents including, but not limited to:
 - 1. Events and announcements;
 - 2. Job opportunities;
 - 3. Updates on ordinances, resolutions, and other action of the Board of Supervisors;
 - 4. Explanation and clarification on actions of the Board of Supervisors;
 - 5. Solicitations for resident input in the form of surveys and polls;
 - 6. Pictures of Township and regional amenities such as parks, neighborhoods, scenery or community events;
 - 7. Updates to the Township website including agendas and minutes, photos, and new functionality; and

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8. Appropriate newsworthy department announcements such as, but not limited to road closures, detour information, winter weather alerts, open houses, criminal investigations, safety tips and new development information.

D. Those designed to post to social media pages on behalf of the Township shall be considerate of the following:

- i. As a Township spokesperson, it is important to conduct yourself in a manner consistent with the high ethical and moral standards expected of a government employee;
- ii. Adhere to all Township policies and codes of conduct and observe conventionally accepted protocols;
- iii. When possible, opinion and commentary will be omitted from social media posts;
- iv. Identify themselves as a member of Township staff; and
- v. Not conduct political activities or personal business.

IV. Personal Use

A. Precautions and Prohibitions

- i. Employees of Ferguson Township are prohibited from accessing and updating personal social media pages during their scheduled work period. This restriction does not apply during scheduled break or lunch periods.
- ii. Township personnel shall not post, transmit, or otherwise disseminate information to which they have access as a result of their employment without written permission from the Township Manager or his designee.
- iii. Township personnel may not divulge information gained by reason of their authority; make any statements, speeches, appearances, and endorsements; or publish materials that could reasonably be considered to represent the views or positions of the Township without express authorization of the Township Manager or his designee.
- iv. Township personnel should be aware that they may be subject to civil litigation for:
 - 1. Publishing or posting false information that harms the reputation of another person, group, or organizations (defamation);

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2. Publishing or posting private facts and personal information about someone without their permission that has not been previously revealed to the public, is not of legitimate public concern, and would be offensive to a reasonable person;
3. Using someone else's name, likeness, or other personal attributes without that person's permission for an exploitative purpose; or
4. Publishing the creative work of another, trademarks, or certain confidential business information without the permission of the owner.
- v. Township personnel should be aware that privacy settings on social media sites are constantly in flux, and should never assume that personal information posted on such media is protected.
- vi. Township personnel should expect that any information created, transmitted, downloaded, exchanges, or discussed in a public online forum may be accessed by the department at any time without prior notice.
- vii. Reporting violations – Any employee becoming aware of or having knowledge of a posting or of any website or webpage in violation of the provisions of this policy shall notify his or her supervisor immediately.

V. Miscellaneous Provisions

A. Applicability of federal, state, and local laws

- i. Nothing contained in this policy is intended to, nor shall be construed as superseding any applicable federal, state, or local laws or rights and liberties including, but not limited to, those provided by the First Amendment, the Freedom of Information Act, the Pennsylvania Right-to-Know Law, the Pennsylvania Sunshine Act, and any applicable information security policies established by the Township.
- ii. All relevant records retention schedules apply to social media formats and social media content. Retention and disposition of social media information will be the same as information that exists in any other form of media, whether paper or electronic. For example, the retention period that shall apply to a social media posting about an employment announcement shall be the same as a paper employment announcement.

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B. This policy is intended to supplement the Township's General Information Technology Policy. Nothing in this policy is intended to, nor shall be construed as superseding the provisions of the General Information Technology Policy, as may be amended.

VI. Exceptions

A. No exceptions to any provisions expressed in this policy will be permitted without the written consent of the Township Manager unless specifically mentioned within this policy.

VII. Penalties

A. Penalties associated with violations of this policy shall be at the sole discretion of the Township Manager.

B. Penalties may include, but are not limited to, temporary or permanent removal of status as a designated Township spokesperson on social media pages, revocation of access to the Township's computer network, suspension, termination, or any other consequence deemed relevant by the Township Manager given the nature of the offense.