

The Town of Grand Island

Social Media Policy

Official Accounts

1. Purpose. The Town of Grand Island (“Town”) maintains “official” social media accounts (“Official Accounts”) for the purpose of communicating with the members of the public in the most effective ways possible. This Policy gives direction to Town employees, elected officials, and other authorized persons regarding the creation, maintenance, and posting of content through Official Accounts. It also provides direction to Town employees and elected officials with respect to social media use through accounts other than Official Accounts.

This Policy is intended to ensure a cohesive online presence for the Town; enable and encourage efficient and civil communication and positive engagement with members of the public; and protect the Town and its employees and elected officials from the potential harm and legal exposure related to online communications.

For purposes of this Policy, social media refers to the creation and exchange of information among individuals through Internet based applications and includes, but is not limited to, information in the form of text, pictures, videos, links to other sites, or any other type of communications posted to a social media site. Examples of social media sites include, but are not limited to, Facebook, Twitter, Instagram, and YouTube. It is understood that social media is an evolving communications tool and that new resources may become available over time.

2. Establishment and Ownership Official Accounts; Site Administrators. The Town Board shall establish, oversee and have access to all Official Accounts and the Town’s overall online presence. Official Accounts will include the “Town of Grand Island” accounts on social media sites, Department-specific Official Accounts for the Police Department and Recreation Department, and any other Town Board-approved Department-specific Official Accounts. The Town Board may establish one or more officers or employees to serve as a Communication Manager for Official Accounts. Should any Department find it necessary to establish a Department-specific Official Account, the Department Head should contact the Communications Manager or the Town Supervisor to discuss obtaining approval from the Town Board to establish the Official Account. Under no circumstances will an Official Account representing an individual position (e.g., a Department Head) be approved.

The Town Board shall designate a Site Administrator for each Official Account. Where the Official Account is Department-specific, the Department Head will generally serve as Site Administrator. Site Administrators must abide by this Policy in all respects when creating, maintaining, and posting content to an Official Account.

All Official Accounts are considered the property of the Town and as such, do not transfer if a Site Administrator terminates employment with the Town or no longer serves in a capacity consistent with Official Account management with the Town.

3. Passwords and Security. Site Administrators must provide credentials (i.e., user names and passwords) for each Official Account to the Communications Manager upon creation and any time log in credentials may change. EXCEPTION: Facebook and other sites requiring personal account information are an exception to the foregoing rule. Usernames and passwords will not be required for such accounts because Site Administrators must use personal accounts to manage pages. Rather than providing personal information, Site Administrators of Official Accounts on Facebook are required to add the Communications Manager as an administrator Official Account. The Communications Manager must have full access to maintain the Official Account in the absence of the Site Administrators. It is advised that Site Administrators also add a secondary back-up administrator to the page, if applicable.

All passwords used for Official Accounts must be adequately complicated to prevent cyberattacks. Passwords should never be sent through email. If at any time a cyberattack on or involving an Official Account is suspected, the Site Administrator must immediately contact the Communications Manager, try to regain access to the Official Account, and change the password if possible. Whenever passwords for Official Accounts are updated, the updated password shall be provided to the Communications Manager.

4. Content. Only the designated Site Administrator for each Official Account will post content to that Official Account. Official Accounts will be used strictly for conveying information about the Town to the public. The Town official website will be the Town's primary and predominant Internet presence. Wherever possible, content posted to Official Accounts will be available on the Town's official website. All content should be complementary of the Town's website and content posted on the social media sites should contain links to the Town's official website. Social media "profile pictures" should clearly represent the Town either with the official Town seal or other identifying marker of Town Department.

Any person or department who is not a Site Administrator wishing to post content to any Official Account shall submit a request to appropriate Site Administrator or Town Board with all necessary information and media, including text, photos/videos and links. Subject to any oversight the Town Board determines necessary and appropriate from time to time, the Site Administrator has the right to approve or deny the request based on the guidelines contained herein. Only content approved by the Site Administrator or Town Board shall be posted. It is the responsibility of the relevant Department Head to ensure that that all content submitted for posting has been fully vetted and is free from error.

Site Administrators should remember that when creating, maintaining, and posting through Official Accounts, they are representing the Town government. Accordingly, they must conduct themselves at all times as a representative of the Town using the highest standards of decorum concerning language and content and abide by all Town policies and procedures in relation to all posts.

The Communications Manager will routinely monitor content on all of the Town's Official Accounts to ensure compliance with this Policy and applicable laws.

5. Account Management. Because the purpose of Official Accounts is for the Town to communicate with the members of the public, where there is an option to do so, accounts should generally be established in such a manner as to limit communications to content created by and approved by the Town in accordance with the policy. However, where it is necessary because of the type of social media account to allow public comment, the following disclaimer shall appear on all Official Accounts where possible or, alternatively will be contained in a page on the Town's website and be linked directly to the Official Account:

As a public entity, the Town must abide by certain standards to serve all its constituents in a civil and unbiased manner. The Town shall be the sole owner of all of its social media accounts and reserves the right to not publish or remove any postings which contain inappropriate content, including, but not limited to:

- *Libelous comments;*
- *Obscenity;*
- *Derogatory or inflammatory comments about an individual's gender, race, age, disability, religion, national origin, or other protected characteristic.*
- *Incitements to violence;*
- *Speech integral to criminal conduct; and*
- *Content appearing to be "spam".*

Town social media sites are intended to be informational. Users should not use these forums for making any official communications to the Town; for example, reporting crimes or misconduct, reporting dangerous conditions, requesting an inspection, giving notice required by an statute, regulations or ordinance, such as, but not limited to, notices of claims.

It is understood that the Town of Grand Island's social media sites are not monitored 24 hours a day, 7 days per week and immediate responses to any requests via post, direct message, etc. may not occur. The Town reserves the right to not reply or decline to reply to any/all comments posted to its social media accounts. It is also understood that the Town will not automatically "friend", "like", or "connect" to users who follow, comment or "like" Town posts.

Content posted by a member of the public to any Town social media shall not reflect the opinions or policies of the Town.

Site Administrators will maintain accounts in accordance with this disclaimer, however will obtain approval of the Communications Manager (who, in turn, will consult with the Town Supervisor and the Town Attorney where appropriate) before removing any post or "blocking" any user.

6. Terms of Service. Site Administrators are required to be familiar with, and to abide by, the Terms of Service (TOS) of the relevant social media site for each Official Account for which they serve as Site Administrator.
7. Compliance with Law. All Official Accounts and content posted thereon shall adhere to applicable federal, state and local laws, regulations and policies.
8. Public Records. All content posted on or through Official Accounts, including comments submitted, comments removed, and a list of subscribers or “followers”, is considered a public record and subject to the New York State Freedom of Information Law and will be retained and maintained by the Town Clerk pursuant to the record retention policy.

Elected Officials

Any elected officials who post through Official Accounts must abide by this Policy in all respects.

Elected officials who choose to create, maintain, or use social media accounts (other than Official Accounts) are solely responsible for the content of such accounts and any liability that may arise from same. The Town recognizes that elected and appointed officials may choose to express themselves through such accounts; however, this right of expression should not interfere with the operation of the Town.

Elected officials should assume that, if any Town business or communication is conducted on a social media account (even a non-Official Account), the account will be considered a public record and will be subject to the New York State Freedom of Information Laws (FOIL), as well as applicable sections of the records retention schedule. Elected officials are also reminded that conversations with other Town elected officials social media accounts may trigger Open Meeting Law concerns. Finally, elected officials may not “block,” remove, or otherwise censor public comment on social media accounts (even non-Official Accounts) except as permitted by applicable law.

Employees

Town Employees may not create, maintain, or post content using Official Accounts except as permitted under this Policy. Employees should also refer to and abide by the Social Media Policy and other relevant policies set forth in the Town’s Employee Handbook.

This Policy shall be reauthorized yearly at the Town’s organizational meeting held in January of every year.