

City of  
**GREENFIELD, MASSACHUSETTS**  
**OFFICE OF THE MAYOR**

**SOCIAL MEDIA  
POLICY AND PROCEDURES**

**PURPOSE:**

This document defines the social media policy for the City of Greenfield, MA, referred to herein as "the City". This policy is intended to provide guidelines to ensure that social media tools are used properly and to address potential risks. The City recognizes that the secure use of social media can enhance communication, collaboration, and information exchange; streamline processes; and foster productivity. To address the fast-changing landscape of the Internet and the way residents communicate and obtain information online, City departments may consider using social media tools to reach a broader audience, and further the goals and missions of departments, where appropriate. The City has an overriding interest and expectation in deciding what is "spoken" on its behalf on social media sites.

This policy is not meant to address one particular form of social media; rather social media in general, as advances in technology will occur and new tools will emerge. The City also recognizes the role that social media sites play in the personal lives of some City personnel. The personal use of social media can have bearing on City personnel in their official capacity. This policy establishes guidelines for the use of social media, management of social media and provides guidance on management, administration, and oversight.

**DEFINITIONS:**

- **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."
- **PAGE:** The specific portion of a social media website where content is displayed, and managed by an individual or individuals with administrator rights.
- **POST:** Content an individual shares on a social media site or the act of publishing content on a site.
- **PROFILE:** Information that a user provides about himself or herself on a social networking site.
- **SOCIAL MEDIA OR SOCIAL MEDIA PAGE:** A category of Internet-based resources that integrate user generated content and user participation. This includes, but is not

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limited to, social networking sites (Facebook, MySpace), microblogging sites (Twitter, Nixle), photo and video sharing sites (Instagram, YouTube), wikis (Wikipedia), blogs, and news sites (Digg, Reddit).

- **SOCIAL NETWORKS:** Online platforms where users can create profiles, share information, and socialize with others using a range of technologies.
- **SPEECH:** Expression or communication of thoughts or opinions in spoken words, in writing, by expressive conduct, symbolism, photographs, videotape, or related forms of communication.
- **CITY PERSONNEL:** Anyone performing services for a city or town or holding a municipal position, whether paid or unpaid, including full- and part-time municipal employees, elected officials, volunteers, and consultants. This is the same definition as a municipal employee under the Massachusetts conflict of interest law, M.G.L. c. 268A. This term is interchangeable with “City-employee”.

## **EXTERNAL SOCIAL MEDIA POLICY**

### **1. PURPOSES OF OFFICIAL CITY-SANCTIONED SOCIAL MEDIA PAGES:**

Social media is a valuable tool when seeking to convey information about public announcements, public meetings, and press releases. Social media can be used to make time-sensitive notifications related to storms, weather-related delays and cancellations, road closures, and special events. Social media can be used for community outreach and engagement. Persons seeking employment and volunteer positions use the Internet to search for opportunities, and social media can be a valuable recruitment mechanism.

### **2. CITY-SANCTIONED SOCIAL MEDIA PAGE REQUIREMENTS:**

- A. Each City-sanctioned social media page shall include an introductory statement that clearly specifies the purpose and scope of the Department’s presence on the platform, and the City’s Terms of Use as a “limited public forum”, as contained in this document, section 5.
- B. All City-sanctioned social media pages shall be approved by the Mayor or Communications Director and shall be administered by the City Information Technology (IT) Department. The City will have a maximum of 10 Social Media pages, unless more are expressly approved by the Mayor.
- C. Social media page(s) should link to the City’s official website.
- D. Social media page(s) shall be designed for the target audience(s) such as youth, or library users.



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- E. All official City-sanctioned communication through social media should remain professional in nature and should always be conducted in accordance with the City's policies, practices and expectations. Employees must not use official City-Sanctioned social media for political purposes, to conduct private commercial transactions, or to engage in personal communication or private business activities.
- F. All City-sanctioned social media pages shall clearly indicate they are maintained by the City and shall have City contact information prominently displayed.
- G. Social media content shall adhere to all applicable laws, regulations, and policies, including all information technology and records management policies.
- H. Social media pages should state that the opinions expressed by visitors to the page(s) do not reflect the opinions of the City. This is outlined in the City's Terms of Use, as contained in this document, section 5.
- I. Pages shall clearly indicate that posted comments will be monitored and that the City reserves the right to remove obscenities, off-topic comments, personal attacks, and unfounded claims regarding City policies and City personnel.
- J. Pages shall clearly indicate that any content posted or submitted for posting is subject to public disclosure.

### **3. TERMS OF USE:**

This statement should be edited to apply to each department, and clearly posted in the "about" section or Introductory Section of each City-sanctioned social media page:

*"Terms of Use:*

*The purpose of this page is limited to specific subject matter pertaining to the XXX Department of the City of Greenfield, thus off-topic comments are also subject to rejection or removal.*

*The opinions expressed by visitors to this page do not reflect the opinions of the City of Greenfield.*

*This social media page serves as a limited public forum and all content published is subject to monitoring. User-generated posts will be rejected or removed when the content is:*

- 1. off-subject or out of context,*
- 2. contains obscenity or material that appeals to the prurient interest,*
- 3. contains personal identifying information that is not a matter of public record, or sensitive personal information,*
- 4. contains offensive terms that target protected classes,*
- 5. is threatening, harassing or discriminatory,*
- 6. incites or promotes violence or illegal activities,*



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7. *contains information that reasonably could compromise individual or public safety,*
8. *advertises or promotes a commercial product or service, or any entity or individual,*
9. *promotes or endorses political campaigns or candidates, or*
10. *Is a personal attack."*

*All content on this social media page is subject to public records law, M.G.L.: Part I: Title X: Section 66."*

#### **4. PUBLIC RECORDS:**

- A. Content is subject to public records laws. Relevant records retention schedules apply to social media content. City of Greenfield's social media pages are subject to public records law (M.G.L.: Part I: Title X: Section 66.").
- B. Any content maintained in a social media format related to City business, including communication posted by the City and communication received from citizens, is a public record. The Department maintaining each social media page is responsible for responding completely and accurately to any public records request for social media content.
- C. Applicable retention requirements apply regardless of the form of the record (for example, digital text, photos, audio, and video). The Department maintaining a site shall preserve records pursuant to a relevant records retention schedule for the required retention period in a format that preserves the integrity of the original record and is easily accessible. Furthermore, retention of social media records shall fulfill the following requirements:
  - a. Social media records are captured in a continuous, automated fashion throughout the day to minimize a potential loss of data due to deletion and/or changes on the social networking site.
  - b. Social media records are maintained in an authentic format (i.e. ideally the native technical format provided by the social network, such as XML or JSON) along with complete metadata.
  - c. Social media records are archived in a system that preserves the context of communications, including conversation threads and rich media, to ensure completeness and availability of relevant information when records are accessed.
  - d. Social media records are indexed based on specific criteria such as date, content type, and keywords to ensure that records can be quickly located and produced in an appropriate format for distribution (e.g. PDF).
  - e. The City utilizes an automated archiving solution provided by ArchiveSocial to comply with applicable public records law and fulfill the above record

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retention requirements. The City of Greenfield's archive is available at: [secure.archivesocial.com](http://secure.archivesocial.com). The IT department will oversee management of this archive, and can assist departments.

## INTERNAL SOCIAL MEDIA POLICY

### 5. PROFESSIONAL USE BY CITY PERSONNEL:

- A. Only individuals authorized by the City, via the Mayor or Communications Director, and issued credentials by the City's Information Technology Department, may publish content to a City-sanctioned social media page.
- B. City personnel representing the City via social media outlets shall do the following:
  - 1. Conduct themselves at all times as representatives of the City and, accordingly, shall adhere to all City standards of conduct and observe conventionally accepted protocols and proper decorum,
  - 2. Identify themselves as a member of the City,
  - 3. Not make statements about the guilt or innocence of any suspect or arrestee, or comments concerning pending prosecutions, nor post, transmit, or otherwise disseminate confidential information, including photographs or videos, related to City training, activities, or work-related assignments without express written permission, and
  - 4. Not conduct political activities or private business.
- C. The use of City computers by City personnel to access social media is prohibited without authorization. City personnel cannot use City computers to conduct personal business or blogging or social networking activities.
- D. City personnel use of personally-owned devices to manage the City's social media activities or in the course of official duties is prohibited without express written permission, on file in HR and with IT. Permission will be granted in certain situations.
- E. Employees shall observe and abide by all copyright, trademark, fair use, and service mark restrictions in posting materials to electronic media. Employees should obtain appropriate permissions for reproduction of images or video. Guidelines on Fair use: <https://www.copyright.gov/title17/92chap1.html#107>
- F. Employees should use care in spelling, grammar, and follow applicable City style and communications guidelines.
- G. City employees should be mindful that inappropriate usage of City-Sanctioned social media can be grounds for disciplinary action.

### 6. PERSONAL SOCIAL MEDIA USE BY CITY PERSONNEL:

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- A. Barring state law or binding employment contracts to the contrary, City personnel shall abide by this policy when using social media.
- B. City personnel are defined as a municipal employee under the Massachusetts conflict of interest law, M.G.L. c. 268A. All City employees may have personal social networking and social media sites.
- C. Express only your personal opinions. Never represent yourself as a spokesperson for the City. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of the City”. If you do publish a blog or post online relating to the work you do or subjects associated with the City.
- D. City personnel are free to express themselves as private citizens on social media sites. But please be respectful. If you decide to post complaints or criticisms, avoid using statements, photographs, video or audio that could reasonably be viewed as malicious, bigoted or prejudiced (e.g., racist, homophobic), obscene, threatening or intimidating or that might constitute unlawfully discriminatory and/or harassing statements or conduct or bullying. Maintain the confidentiality of trade secrets and other, private confidential information to which you have access as City personnel. Do not post internal City reports, policies, procedures or other internal related City confidential communications. If you have any questions concerning whether information you intend to post or disseminate is confidential City information, contact the City’s Human Resources Department.
- E. As public employees, City personnel are cautioned that speech on- or off-duty is not protected speech under the First Amendment and may form the basis for discipline if it is obscene, threatens violence, defames another person or entity or contributes to the creation of a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or City policy. City personnel should assume that their speech and related activity on social media sites will in many cases reflect upon their office and this City. When using social media, City personnel should be mindful that their speech becomes part of the worldwide electronic domain.
- F. City employees must never use their City-issued email account or password in conjunction with a personal social networking or on a social media page or site.
- G. The use of City computers by City personnel to access personal social media is prohibited. City personnel cannot use City computers to conduct personal business or blogging or social networking activities.
- H. City personnel shall not post, transmit, or otherwise disseminate any confidential information to which they have access as a result of their employment without written permission from the Mayor or designee.
- I. City personnel shall not make any statements, speeches, appearances, and endorsements; or publish materials that could reasonably be considered to represent the views or positions of this City without express authorization.




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- J. City 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 organization (defamation);
  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.
- K. City personnel should be aware that privacy settings and social media sites are constantly in flux, and they should never assume that personal information posted on such sites is protected.
- L. City personnel should expect that any information created, transmitted, downloaded, exchanged, or discussed in a public online forum may be accessed by the City at any time without prior notice.
- M. City personnel are prohibited from retaliating against any person for reporting a possible deviation from this policy or for cooperating in an investigation of a reported deviation from this policy.
- N. City employees should be mindful that violations of this social media policy can be grounds for disciplinary action up to and including termination.

**Approved:**

  
Roxann Wedegartner  
Mayor

  
Diana Letourneau  
Human Resources Director

Date 4.14.2022

Date 4/20/2022



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