

SPRING LAKE TOWNSHIP SOCIAL MEDIA POLICY

I. Purpose

- A. This document defines the social media policy for Spring Lake Township (the “Township”). The Township may consider using social media platforms to reach a broader audience.
- B. It is the Township’s intent to utilize social media platforms to enhance communication, collaboration, and information exchange with the public in support of the goals and objectives of the Township. As such, the Township has an overriding interest and expectation in deciding what is “spoken” on its behalf on social media sites.
- C. This Social Media Policy (the “Policy”) is intended to establish guidelines for the Township’s use of social media platforms to promote the effective, efficient, and orderly use of social media platforms to promote accurate and reliable communication with the public.
- D. This Policy applies to all Township employees, contractors, and officials (collectively referred to as “Employees”). This Policy also governs comments by the general public on Township-maintained social media sites.
- E. For purposes of this Policy, social media includes all websites and applications that enable users to create and share content or to participate in social networking. Examples include blogs, wikis, Facebook, Twitter, YouTube, podcasts, videos, photos, and online posts to newspaper articles, as approved by the Township Manager.

II. General Provisions

- A. Establishment of Township-Maintained Social Media Sites
 - 1. The establishment of Township-maintained social media sites is subject to the approval of the Township Manager.
 - 2. Administrative access to Township social media accounts will be limited to the Township Manager, Webmaster, Department Heads, and any other designated Employees.
 - 3. Township social media sites shall clearly state that they are maintained by the Township and shall contain a link to this Policy.
 - 4. The Township Manager reserves the right to terminate any Township social media site at any time without notice.
- B. Compliance with Applicable Laws and Requirements
 - 1. Township social media sites shall be managed consistent with the Open Meetings Act, 1976 PA 267, and Employees are prohibited from any activity that would violate it.

2. Township social media sites will comply with usage rules and regulations required by the site provider, including privacy policies, and shall adhere to all applicable federal, state, and local laws, regulations, and policies.
3. Township-maintained social media sites are subject to the Freedom of Information Act (“FOIA”), 1976 PA 442. Any content maintained on a Township social media site that is related to Township business, including a list of subscribers, posted communication, and communication submitted for posting may be considered a public record and subject to public disclosure.
4. Nothing in this Policy shall be interpreted or applied to limit or interfere with an Employee’s right to engage in lawful activities protected by state or federal law, or from disclosing non-confidential and non-proprietary information pursuant to their lawful right to do so.
5. The Township prohibits the taking of any retaliation action against any Employee for reporting a possible deviation from this Policy or from cooperating in any investigation related to it. Any Employee who retaliates against another for such conduct will be subject to disciplinary action, up to and including termination.

III. Guidelines for Posts

A. Township Postings Guidelines

1. The goal of the Township-maintained social media sites is to serve as an online information source focused on Township issues, projects, news, and events. These sites are not intended to create a public forum.
2. The content of Township social media postings shall pertain to Township-related or sponsored/supported news, issues, programs, meetings, services, and events. Content can include, but is not limited to, information, photographs, videos, and hyperlinks. Wherever possible, links to more information will direct users back to the Township’s official website.
3. Content posted to official Township social media sites shall not be a substitute for any public notice requirements mandated by federal, state, or local law.
4. Postings may not contain any personal information except for the names of Employees whose job duties include being available for contact by the public. Postings may not contain any confidential Township information including, but not limited to, pending Township litigation, personnel matters, or anything that would be exempt from disclosure under FOIA.
5. Any Employee authorized to post items on any of the Township-maintained social media sites shall do so for authorized Township business only.
 - a. While posting on behalf of the Township, Employees may not express personal views or concerns through such postings. All postings on any Township-maintained

social media site shall reflect only official goals, objectives, policies, and views of the Township.

- b. Employees who are authorized to post on the Township's behalf must ensure that the communication is honest, factual, and accurate and that it is consistent with the Township's values and professional standards.
6. The Township reserves the right to monitor, prohibit, restrict, block, suspend, terminate, delete, or discontinue an Employee's access to any social media sites on any Township-owned equipment or Township accounts at any time, without notice and for any or no reason and in its sole discretion. Employees do not have any right to or expectation of privacy with respect to their use of social media on Township-owned equipment. Further, all passwords to access Township-owned equipment or Township-maintained social media accounts must be maintained by the Employee and recorded with the Township Manager. The Township Manager must be informed of any password changes within 24 hours of the change.

B. Employee Personal Posting Guidelines.

1. Any such postings must be made on personal equipment and on personal time.
2. If the personal posting relates to the Township in any way, it must include the following disclaimer: "This posting represents my own views and does not represent the Township of Spring Lake's position or opinion in any way."
3. Posting may not include any confidential information or any personal information about any Employees.
4. The Township's conduct rules, including those that prohibit discrimination, harassment, and threats of violence, apply to social media activity. Employees must be respectful to others involved with the Township. For example, prohibited activity includes statements, photographs, videos, or audios that could be viewed as malicious, obscene, threatening, or intimidating, or that could be viewed as disparaging Employees or other individuals involved with the Township, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or other status protected by law or Township policy.

C. User Postings Guidelines. The following terms of use shall apply to any users of Township-maintained social media sites, and the Township shall display these terms where appropriate.

The Township welcomes comments and questions from the public on its social media sites. The site is intended to serve as a mechanism for communication between the Township and members of the public. Users are hereby notified that any posted content may be a public record subject to public disclosure under the Freedom of Information Act. Users are also expected to comply with the following rules and understandings:

1. Communications made through social media sites shall in no way be deemed to constitute legal notice to the Township or any of its officers, employees, agents, or representatives, with respect to any existing or potential claim or cause of action against the Township or any of its agencies, officers, employees agents, or representatives, where notice to the Township is required by any federal, state or local law, or rule or regulation.
2. The Township shall have full permission or rights to any content posted by the Township, including photographs and videos.
3. Comments posted to any of the Township-maintained social media sites will be monitored, and the Township reserves the right to remove certain forms of published content, including the following:
 - a. Activity that would be excluded from the Constitutional protections of the First Amendment, including activity that would be considered defamatory, obscene, indecent, hate speech, or fighting words;
 - b. Activity that the author does not have the necessary rights, licenses, and consents to post;
 - c. Activity that constitutes spam, incoherent or excessive links or codes, unauthorized advertising, or solicitation;
 - d. Activity that contains sensitive or personally identifiable information or otherwise invades another individual's privacy; and
 - e. Activity that violates or encourages the violation of any applicable state or federal law or regulation.
4. Comments that are removed from a Township social media site shall be documented and recorded. The comment and context, as well as who removed the comment and the reason for removal, shall also be recorded and retained in accordance with any applicable Freedom of Information Act requirements.
5. A comment posted by a member of the public on a Township social media site is the opinion of the commentator or poster only, and the posting of a comment does not imply endorsement of, or agreement by, the Township, nor do such comments necessarily reflect the opinions or policies of the Township. The Township does not guarantee the authenticity, accuracy, appropriateness, or security of external links, websites, or linked content.