

TOWN OF BIG FLATS SOCIAL MEDIA POLICY

1.0 Policy Statement

Using social media technologies can help the Town of Big Flats engage citizens and make government more open and transparent. The Town can use these technologies to increase collaboration, greater participation and improved operational efficiencies between and among Town workforce members. This policy sets forth responsibilities of the Town using social media technologies as well as rules and expectations for the responsible use of social media by Town workforce members in their official capacities so that they can access social media for professional use.

1.1 Use of Social Media Tools

The Town can use social media tools in a variety of ways to further its mission and engage its constituencies. Social media sites can consist of public facing sites used to communicate and engage the citizenship and promote transparency. Private internal social media technologies may also be used as a business tool to increase collaboration, greater participation and improved operational efficiencies among State workforce members.

1.1.1 Town of Big Flats Government Entity Social Media Sites

The creation, maintenance, and discontinuance of the Town's social media sites is the sole responsibility of the Town of Big Flats. The Town Supervisor or his/her designee is responsible for maintaining Town's social media site(s), including but not limited to securely maintaining the location and access rights associated with such sites.

Content

When posting on Town owned or maintained social media sites, only users authorized by the Supervisor or his/her designee may post on behalf of the Town government pursuant to an established content approval process. Supervisor approval is not required for postings to non-public, internal-facing, Town government approved social media technologies. Content posted on any Town government entity social media site must comply with all applicable Federal and State laws, regulations and policies as well as any terms of use/terms of service applicable to the social media site being used. Town government entities are required to create a moderation (i.e. preview, accept, reject) process for all user-generated content (i.e., comments, file uploads, etc.) in order to help ensure compliance with laws, terms of use, security risk mitigation and the purposes of this policy. If technically feasible the Town government entities may disable features on their managed social media sites that allow users to post content such as comments, videos, or other types of shared files in order to manage their sites.

Content management should be overseen by the Supervisor or his/her designee and the attorney for the town

Social Media Use Statement

A “Social Media Use” statement outlines the expectations of all of those using a specific social media technology, whether Town workforce or external users. All Town government entity social media sites must prominently display or link to the following statewide Social Media Use statement or a Social Media Use Statement that is substantively similar to the following:

Statewide Social Media Use Policy

The Town of Big Flats engages others through many digital outlets, including a Facebook web page and a website at www.bigflatsny.gov. Communicating with the Town through social media enables you to contact us in a direct and meaningful way.

Social media sites such as Facebook and Twitter pages are located within host sites that maintain their own terms of service, terms of use, privacy policies or other rules (“Terms of Service”) governing the use of these sites. You are subject to the TOS of the host site when you visit a Town agency social media site. Information (photos, videos, messages etc.) you share with or post to Town agency pages may be used by the owners of the host site for their own purposes pursuant to its TOS. For more information, consult the host website's TOS which is usually located on the first page of their sites.

The Town of Big Flats may also host its own social media sites; whose site-specific Terms of Service govern your use of those sites. You agree that any information you post on a Town of Big Flats social media site is irrevocably, permanently licensed to the Town of Big Flats and may be treated by the Town as public information subject to disclosure to third parties. If a copyright is indicated on a video, photo, graphic or other material, permission to copy the material must be obtained from the original source of the material before posting.

Communications made to the Town of Big Flats through a Town of Big Flats social media site will not be considered formal public comment and shall not constitute official legal notice to the Town or requests for records under the Freedom of Information Law. Such submissions will not be acknowledged.

Disclaimer

Many social media tools generate advertisements for third party websites and applications as a source of revenue. To safeguard against potential liability issues, the Town of Big Flats has developed and will post a disclaimer in a prominent location on

each of its social media web pages that contains these advertisements. All disclaimers must be approved by the Town government's legal counsel before being posted. The following is the Town of Big Flats official disclaimer:

Disclaimer

“Thank you for visiting the Town of Big Flats web site or other social media that officially belongs to the Town. The opinions and beliefs expressed by users on this site are those of the users and do not necessarily reflect the views or opinions of the Town of Big Flats. Comments posted on this site are not considered formal public comments and are not promised or guaranteed to be accurate, current, or complete. The Town of Big Flats assumes no responsibility for and expressly disclaims responsibility for updating these sites to keep information current or to ensure the accuracy or completeness of any posted information. The Town of Big Flats is not required to preserve indefinitely all material posted to its digital outlets. Links or advertisements provided on these sites may have been placed there by the social media host site and not the Town of Big Flats. Their placement does not constitute an endorsement of the content, viewpoint, accuracy, opinions, policies, products, services, or accessibility of those items by the Town of Big Flats. Once you follow a link to another site from these sites, including another site maintained by the State or another town, you are subject to the terms and conditions governing the use of that website.”

1.2 Use of Social Media by Town Workforce Members In Their Official Capacities

Town workforce members may use social media technologies in their official capacities and on behalf of the Town government they work for if authorized by the Town of Big Flat's Supervisor or his/her designee. The Town of Big Flats may also authorize Town workforce members to use social media technologies to (a) increase collaboration among Town workforce members, (b) support greater participation in the Town government entity's operations, where appropriate, and (c) improve operational efficiencies within the Town government entity.

Town workforce members must adhere to the following rules when using such technologies through Town IT resources and/or in their capacities as a Town workforce member. Town workforce members:

- Shall abide by all applicable policies, terms of use and work rules including the NYS IT policy on Acceptable Use of Information Technology (IT) Resources, regarding the use of the Internet and information technology resources when using social media tools in their capacity as Town workforce members. The use of social media tools on Town IT resources will be monitored by the same method as defined in those policies and work rules. See:

<https://its.ny.gov/document/acceptable-use-information-technology-it-resources-policy> and also see below.

- Are responsible for all of their own online activities
- Shall not discuss or post confidential, proprietary or otherwise restricted information.
- Shall obtain the necessary authorizations by the Town Supervisor or other designee, as appropriate, to communicate on behalf of the Town government.
- When speaking on behalf of the Town government, must be transparent when participating in any online community; they should disclose their identity and affiliation with the Town government.
- Shall communicate in a professional manner.
- Shall abide by copyright and other applicable laws. A user's comments and posts may be permanently available and open to being republished in other media. Users should be aware that libel, defamation, copyright and data protection laws apply to postings on social media websites.
- Must obtain permission before publishing photographs, videos, or music not owned by the publisher from the creator of those items. This should be done by a release and they should consult with the Town Attorney before posting them on a Town site. If it is intended to quote an individual that person's permission should be obtained in writing. It is acceptable to publish photos of people taken at a public place or function. If the photographer is a Town employee, then he/she should attempt to get a release to publish from as many people as possible. These public photos are not to be used in any commercial activity or purpose without written consent of the person(s) in the photograph. If there is any uncertainty, consult with the Town Attorney before publishing.

State workforce members should be aware that there is a reasonable chance that their posting on social media sites could be misconstrued as a position of the Town government if the Town workforce member posts material while using their official title, or posts material with a description of their work at a State government entity. In such circumstances, users can use a disclaimer such as the following where technically feasible to avoid this situation: "The views and opinions expressed are those of the author and do not necessarily reflect those of the Town of Big Flats government."

1.3 Legal Issues

The legal issues regarding the use of social media may differ across State governmental entities. Therefore, before the implementation of social media technologies, the Town government should be aware of the legal issues relevant to their organization.

Specifically, the Town government needs to make sure that the tools they use do not violate any privacy laws, New York State information technology and records policies and laws, requirements of Federal law, copyrights, Terms of Use policies or contracts.

1.4 Mitigation of Security Risks

For successful integration of social media into an organization's operations, it is important that special consideration be given to securing the organization's information and systems from malicious activity. The Town government should review the NYS Information Security Policy as well as NYS Information Technology Policy, IT Best Practice Guideline for Secure Use of Social Media which provides best practices for the secure use of social media by the Town government. The Town government should realize that the use of social media within the organization does pose a risk that can be limited but never eliminated.

2.0 Policy Compliance

This policy shall take effect upon publication and shall be reviewed at least once every two years to ensure relevancy.

3.0 Related Documents

The statewide IT policies in the "Security" category relevant to this policy may be found here -- www.its.ny.gov/tables/technologypolicyindex.htm/security -- including:

Acceptable Use of Information Technology Assets

Secure Use of Social Media

Information Security Policy

Identity Assurance Policy/Standard

Security Logging Standard

NYS IT policy on Acceptable Use of Information Technology (IT) Resources, regarding the use of the Internet and information technology resources when using social media tools is set forth below:

Use of Social Media

1. The use of public social media sites to promote Town activities requires written pre-approval of the Town Supervisor or other designee. Approval is at the discretion of the Town Supervisor or other designee and may be granted upon demonstration of a business need and review and approval of service agreement terms by the Town Attorney, if appropriate. Final approval by the Supervisor or other designee will define

the scope of the approved activity, including, but not limited to, identifying approved users.

2. Unless specifically authorized by the Supervisor, the use of Town email addresses on public social media sites is prohibited. In those instances, in which users access social media sites on their own time utilizing personal resources, they must remain sensitive to expectations that they will conduct themselves in a responsible, professional, and secure manner with regard to references to the Town and Town staff. These expectations are outlined below.
3. **Use of Social Media within the Scope of Official Duties**
 - a. The Town Supervisor, or designee, must review and approve the content of any posting of public information, such as blog comments, tweets, video files, or streams, to social media sites on behalf of the Town. However, Supervisor approval is not required for postings to public forums for technical support, if participation in such forums is within the scope of the user's official duties, has been previously approved by his or her supervisor, and does not include the posting of any sensitive information, including specifics of the Town's information technology infrastructure. In addition, Supervisor approval is not required for postings to private Town approved social media collaboration sites (e.g., Yammer). Blanket approvals may be granted, as appropriate.
 - b. Accounts used to manage the Town's social media presence are privileged accounts and must be treated as such. These accounts are for official use only and must not be used for personal use. Passwords of privileged accounts must follow New York State information security standards, be unique on each site, and must not be the same as passwords used to access other Town information technology resources.
 - c. Information posted online on behalf of the Town may be subject to the record retention/disposition provisions of the Arts and Cultural Affairs Law , www.archives.nysed.gov and may be subject to Freedom of Information Law (FOIL) requests.

4. Guidelines for Personal Use of Social Media. Staff should be sensitive to the fact that information posted on social media sites clearly reflects on the individual and may also reflect on the individual's professional life. Consequently, staff should use discretion when posting information on these sites and be conscious of the potential perceptions of and responses to the information. It is important to remember that once information is posted on a social media site, it can be captured and used in ways not originally intended. It is nearly impossible to retract, as it often lives on in copies, archives, backups, and memory cache.

Users should respect the privacy of Town staff and not post any identifying information of any Town staff without permission (including, but not limited to, names, addresses, photos, videos, email addresses, and phone numbers). When you choose to post comments on social media sites, you are legally responsible for those comments.

If a personal email, posting, or other electronic message could be construed to be an official communication, a disclaimer is strongly recommended. A disclaimer might be: "The views and opinions expressed are those of the author and do not necessarily reflect those of the Town of Big Flats government." Users should not use their personal social media accounts for Town official business, unless specifically authorized by the Supervisor. Things posted on personal social media accounts that relate to the Town government may also be subject to FOIL requests. Users are strongly discouraged from using the same passwords in their personal use of social media sites as those used for work, in order to prevent unauthorized access to Town resources in the event that the password is compromised.

The Town of Big Flats Supervisor always has the right to delete or modify anything posted on a Town owned or managed site that he/she deems to be inappropriate, inaccurate or otherwise objectionable. The poster should be notified of any changes made.