

POLICY NO. P21-02

SOCIAL MEDIA POLICY

CITY OF COLDWATER AND BOARD OF PUBLIC UTILITIES

(Effective Date: 09/13/2021)

1. **Purpose.** This policy establishes guidelines for the City of Coldwater’s (“the City”) use of social media as a way to convey information about the City, its events and activities. The main purpose behind the City’s use of social media sites is to disseminate information from the City, about the City, to the public in a civil and unbiased manner.

2. **General Policy.** For the purposes of this policy, “Social Media” means any facility for online publication and commentary, including without limitation, blogs, wikis, content hosting sites such as Flickr and YouTube, and social networking sites such as Facebook, Instagram, LinkedIn, and Twitter. This policy is in addition to and complements any existing or future City policies regarding the use of technology, computers, smart phones, e-mail and the internet. By its use of Social Media, the City does not intend to establish a general purpose public forum, but rather to establish a limited purpose forum for the communication of events and information.

Wherever possible, City Social Media sites should link back to the official City of Coldwater website at <http://www.coldwater.org> for forms, documents, online services and other information necessary to conduct business with the City. The City has an overriding interest and expectation in deciding what is “spoken” on behalf of the City through Social Media.

The establishment and use by a City department of a City Social Media site is subject to approval by the City Manager and/or the Director of the Coldwater Board of Public Utilities. Each City Social Media site shall establish guidelines for the use of the site, including, but not limited to the following:

- a. Identify the purpose of the site, which may include the dissemination of general information about the City or about a specific department or a specific City activity, event, or project.

- b. Identify the City department that will be directly responsible for creating content for the site and monitoring the content.

- c. Each City Social Media site must make clear that it is maintained by the City of Coldwater and that it will follow this Social Media Policy.

- d. To the extent possible, City Social Media sites must link back to the City's website for forms, documents, online services, and other information necessary to conduct business or use City services.
 - e. The City's website at <http://www.coldwater.org> must remain the City's primary and predominant Internet presence.
3. **Comment Policy.** As a public entity, the City must abide by certain standards in order to serve all of its constituents in a civil and unbiased manner. To that end, the following rules apply to comments on City Social Media sites. These standards shall be published on each City Social Media site:
- a. The main purpose for establishing a City Social Media presence is to disseminate information to residents of the City.
 - b. Although posts and comments may be encouraged on some City Social Media sites, these sites are intended to be *limited public forums* and they are moderated by City staff. All posted content (comments, links, photos, etc.) must be related to discussion of City programs, services, projects, issues, events, and activities.
 - c. A comment by a member of the public on a City Social Media site is the opinion of the commentator or poster only, and publication of the comment does not imply endorsement of or agreement by the City or the department with the comment, nor do such comments necessarily reflect the opinions or policies of the City or the department.
 - d. Comments containing any of the following inappropriate forms of content shall not be permitted and are subject to removal and / or restriction by the City and the City reserves the right to restrict or remove any content that is deemed in violation of this policy or any applicable law:
 - 1. Profane, vulgar, or obscene comments.
 - 2. Violent or pornographic content or language or links to such content.
 - 3. Comments not related to the business of the City, including random or unintelligible comments.
 - 4. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, gender, national origin, religion, age, sexual orientation, gender identity, marital status, or mental or physical disability.
 - 5. Defamatory or personal attacks against any person or organization.

6. Threats to any person or organization.
 7. Comments or content that are hateful or incite violence.
 8. Solicitation of commerce, including but not limited to advertising of any business or product for sale.
 9. Conduct in violation of any federal, state or local law.
 10. Encouragement of illegal activity.
 11. Information that may tend to compromise the safety or security of the public or public systems.
 12. Content that violates a legal ownership interest, such as a copyright, of any party.
 13. Comments in support of, or in opposition to, any political campaign or ballot measure.
- e. Additionally, comments that contain the following personally identifiable information (PII) should be immediately removed. PII includes the following:
1. Social security numbers.
 2. Financial account numbers.
 3. Dates of birth.
 4. Names of minor children.
 5. Individual taxpayer identification numbers.
 6. Personal identification numbers.
 7. Other unique identifying numbers.
- f. All users of third-party social media sites such as Facebook, Instagram, etc., are also subject to the third-party site's own policies. The City has no control over a third-party's policies unless otherwise stated. Further, the City has no control over content, commercial advertisements, or other postings produced by the third-party social media site that appear on the City's Social Media as part of that site's environment.

- g. Any content removed based on these guidelines must be retained by (the department administrator of the social media) consistent with Michigan public record retention law, including the content, time, date, and identity of the poster, when available.
- h. Freedom of Information Act and discovery rules and policies apply to social media content and therefore content must be able to be managed, stored and retrieved to comply with these laws. Users of all City social media must adhere to all applicable federal, state and local laws, regulations and policies.
- i. Any content maintained in a social media format that is related to City business, including a list of subscribers and posted communication, is a public record. Content related to City business shall be maintained in an accessible format pursuant to City policy and practice so that it can be produced in response to a legal request. Wherever possible, such sites shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure.

4. **Administration.**

- a. The department responsible for the maintenance of the Social Media site shall monitor the site for comments requesting responses from the City and for comments in violation of this policy.
- b. The City reserves the right to deny access to the Social Media site to any individual who violates this policy at any time, with or without prior notice.
- c. The following language may be used to warn individuals about their posted content: “Your recent post is in violation of the City of Coldwater Social Media Policy. Please refrain from posting inappropriate content in the future. If you do not refrain from posting such content, we will block you from this forum. Thank you for understanding.”
- d. The social media policy must be displayed to users on the social media site or the site must contain information for users about where they may find the social media policy.

5. **Copyright Policy.** Material made available via official City Social Media sites is the property of the City of Coldwater and is intended for informational purposes only. Any re-use, transmission, duplication, or distribution of any material found on an official City Social Media site must be clearly attributed to the City of Coldwater. Commercial uses of copyrighted materials found on City Social Media sites is expressly prohibited without express written consent from the City of Coldwater. Any and all trademarked or copyrighted logos or taglines may not be used for any non-governmental purpose.