

City of Manchester Social Media Policy

Overview

The purpose of this Social Media Policy is to:

- **Educate** city employees and the community
- **Empower** social media advocacy
- **Encourage** employee use of social media to share accurate information

Purpose

The City of Manchester supports the use of social media technology to enhance communication, collaboration, and information exchange to meet the City's business mission and goals. This policy assists employees in making responsible decisions about their use of social media while acting in their official capacity or acting on behalf of the City.

This policy works to follow best practice guidelines to educate, empower, and encourage the professional use of social media and at the same time, prevent misuse and prevent the release of inappropriate information.

Employees and volunteers representing the City or acting in their official capacity through social media outlets, or participating in social media features on City websites, must maintain a high level of ethical conduct and professional decorum as defined in the Human Resources Workplace Communications/Email Policy. Failure to do so is grounds for revoking privilege to participate on official City social media sites and other social media features, and could be subject to disciplinary action if in violation of the City's Workplace Communications/Email, Confidentiality, Workplace Violence, and Sexual Harassment Policies.

Any conduct that adversely affects one's job performance, the performance of fellow employees, or otherwise adversely affects members, customers, suppliers, people who work on behalf of the City of Manchester, or City of Manchester's legitimate business interests may result in disciplinary action up to and including termination. Violation of any city policy regarding the use of social media, will be subject to disciplinary action up to and including termination.

Consistent with R.S.A. 98-E, this policy shall not be interpreted or applied in any manner that prevents any city employee or volunteer acting in the personal capacity from discussing or commenting on any matter concerning a governmental entity or its policies.

Applicability:

This policy shall apply to:

- All employees of the City of Manchester.
 - Employees shall mean:
 - Regular full-time employees;
 - Part-time employees;
 - Interns;
 - Temporary/Seasonal employees;
 - Official volunteers;
- Employees who have access to official social media accounts;
- This policy shall not apply to elected officials of the City of Manchester.

Definition of Social Media

Social media, as used herein, is defined as a network, website, application, platform, or some combination thereof that facilitates user participation, networking and collaboration through the submission of content by an individual user. Examples of social media include but are not limited to blogs, wikis, microblogging sites (Twitter), social networking sites (Facebook - META), photo sharing sites (Flickr, Instagram), journal or diary, personal websites, chat rooms and video sharing sites (YouTube, TikTok, Snapchat). The term “social media” should be read to include all means of communicating or posting information or content of any sort on the internet whether or not associated or affiliated with the City of Manchester, as well as any other form of electronic communication.

Relationship to Other City of Manchester Policies

Except where expressly indicated, this policy should be interpreted as not to contradict any other policy adopted by City of Manchester and current in effect at the time of adoption.

Types of Social Media Accounts Managed by the City

Official City Social Media Accounts will be archived by the City of Manchester and may include the following platforms:

- Facebook - META Page (City, Department, Public Figure)
- Instagram (Department, Public Figure)
- Twitter (City, Department, Public Figure)
- YouTube (City, Department)

The City recognizes that social media platforms are constantly evolving, and new platforms will undoubtedly be added in the future. A list of Official City Social Media Accounts can be found on the City’s Website: <https://www.manchesternh.gov/Residents/e-Services/Alert-Notifications>

Personal Use

The City shall not infringe on an employee's right to have personal social media accounts. These accounts remain personal in nature and are to be used to share personal opinions and content at the sole discretion of the individual user. Employees should exercise caution when commenting or acting on any social media platform and make clear when they are commenting or acting in their personal capacity as opposed to commenting or acting in their official capacity and be familiar with the following guidelines:

- Avoid referencing the employee's position, role, or employment with the City when commenting or acting in a personal capacity on a social media platform;
- If posting or acting in their personal capacity on a social media platform is permitted under R.S.A. 98-E, an employee of the City of Manchester should avoid wearing any uniform, badge, official insignia, or clothing that would cause a reasonable person to conclude that the employee is acting or commenting in their official capacity, or as a spokesperson for the City of Manchester;
- An employee who is concerned that their individual social media accounts or posts could be construed as either an Official City Social Media Account or post in their official capacity or on behalf of the City, is encouraged to consider using a disclaimer. If the employee is concerned about their personal account being mistaken for an Official City Social Media Account, then it is suggested that the disclaimer be placed in a prominent position on the personal account platform homepage such that all visitors to the page are put on reasonable notice. If the employee is concerned that an individual post or comment on a social media platform may be viewed as a statement in their official capacity or as a spokesperson for the City, then the employee may want to consider adding a disclaimer to the individual post. An example of disclaimers are as follows:
 - Account Disclaimer:** "This account is a personal account of the named individuals. All content of this account including any comments, activities, or postings are the responsibility of the platform and the individual users. The views expressed herein are the views of the individual and are not the views of their employer or the individual in their employment capacity."
 - Post Disclaimer:** "This post or comment is being made in my individual and personal capacity and does not reflect the views of my employer or my views in my employment capacity."
- In some cases, a personal account must be used to publish content to an Official City Social Media Account. (Ex. Facebook - META requires a personal account to post to City pages).
- Employees should recognize and understand that the content and messages they post on social media websites may be public depending on a number of variables, and that if disclosed or discovered, may subject the individual employee to scrutiny;
- Individual employees are not authorized to speak on behalf of the City, department or division on personal accounts;
- Social media may not be used to circumvent other City website policies or City Ordinances;

- City employees must never use their City e-mail account or password in conjunction with a personal social media account;
- Absent approval by a Department Head and Information Systems, no employee shall use their personal social media account to post or comment on behalf of the City, a department of the City, a division of the City or in their official capacity. Approval shall only be granted when dictated by necessity.

Employees are hereby advised and reminded that actions, comments, and posting on their personal accounts could violate City policy. These policies include but are not limited to the City's Harassment and Discrimination Policies, Confidentiality Policies, Ethical rules, and Code of Conduct, and may subject the employee to disciplinary action up to and including termination. Employees are hereby advised and reminded that all social media use must comply with all applicable laws, rules, and regulations.

Retaliation is prohibited

The City of Manchester prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from, or violation of this policy, or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

For further guidance, questions or more information, please contact Human Resources at (603) 624-6543.

Professional Use

All official City-related communication through social media outlets must be professional in nature and must always be conducted in accordance with the City Social Media Policy, City Policies, all applicable laws, rules, and regulations as best practice expectations.

- All City social media accounts need to state clearly and visibly that they are operated by the City of Manchester or on behalf of the City of Manchester;
- All City social media accounts must have an appropriate and relevant username or handle, and include a link to the City website where applicable;
- City social media accounts should be "verified" accounts to ensure that the public knows that they are authentic. Information Systems shall be responsible for the verification of all proposed City Social Media Accounts;
- The content of any page, home screen, homepage, account page associated with any City social media account should only pertain to City-sponsored or City-endorsed programs, services, and events. This content may include, but is not limited to,

information, photographs, videos, and approved hyperlinks. It shall be the responsibility of the particular City Social Media Account user to obtain all necessary releases and permission before posting any materials that may require either permission or a release;

- All employees shall refrain from using social media while on work time or on City of Manchester equipment, unless it is work-related as authorized by your manager or consistent with the City of Manchester Equipment Policy;
- Employees must not use official City social media sites for political purposes, to conduct private commercial transactions, to engage in private business activities, or for any other private, non-City related uses;
- City employees must be mindful that inappropriate usage of official City social media sites can be grounds for disciplinary action as defined in the Human Resources employee handbook, in addition to any other consequences under the law;
- Official City social media accounts, as well as the entire City website is intended to be used only to express the official views of the City of Manchester and are subject to all laws, rules, regulations, policies, best practices guidelines, and standards. An employee shall not use an official City social media account to express their personal views or values;
- Only individuals who have successfully completed social media training conducted by the Information Systems Department are authorized by the City to publish content to a City web site or an official social media account that is purported to be an official action, comment, statement, representation, or post of the City of Manchester.

Government Social Media and the Constitutions

As a government user of social media, the City is mindful of its obligations and the safeguards in place under both the Federal and New Hampshire Constitutions. For example, the City acknowledges and agrees that government agencies must uphold an individual right to freedom of speech as set forth in both the Federal and New Hampshire Constitutions. Consistent with its obligations under both the Federal and New Hampshire Constitutions, **posts, comments, messages, or any interaction on these platforms may not be deleted, hidden or blocked by the City.**

Public Records Law (RSA: 91-A)

The official City social media accounts are subject to the applicable public records laws. Any content maintained on an official social media account related to City business, including communication posted by the City and communications and/or comments received from any other user, is a public record and as such may be subject to disclosure under the law. The Department maintaining the official City social media account is responsible for responding completely and accurately to any public records request pertaining to said social media account.

Social Media Decision Makers and Partners

- Elected Officials
- Director of Information Systems
- Human Resources
- City Solicitor
- Social Media Committee
- Outside Consultants (Ex. Archive Social)

Approval, Registration and Setup

To avoid confusing the public, a consistent approach to the setup of all official City social media accounts by all City departments is important. There are also many security issues that need to be appropriately addressed to insure both the public and the City are protected.

Official City social media accounts will be set up only by the Information Systems Department at the request of the departments that want to utilize them. The security settings implemented will be selected based on the social media platform intended to be used, and taking into account the interest of protecting the City and the public. Social media platforms include, but are not limited to Twitter, Facebook, Instagram, Google, and YouTube. Before a new platform can be considered it must be reviewed by the Social Media committee to determine whether the proposed platform is largely in compliance with all relevant policies and concerns of the City. Any submission to the Social Media Committee for review and consideration must establish the following:

1. Use of the particular social media has been approved by the department head of the department seeking to establish an official City social media account for the platform. The department head of the owning department is responsible for the content posted to the site.
2. A preliminary plan which includes a statement of purpose for the platform specific account must be provided to the Information Systems Department (hereinafter, "ISD") for their review prior to approval, implementation and setup. Implementation of an official City social media account is dependent on a satisfactory review of the statement of purpose by the ISD.
3. All the email contacts used to setup and maintain the official City social media account will be valid City email addresses associated with an employee or group of employees currently employed.
 - a. ISD will maintain a list of all official City social media accounts, with the corresponding City emails and passwords that are associated with them. This ensures the City will have access and control of the official City social media

account when the employee who updates the site leaves the employment of the City or changes roles.

4. Social media platforms are considered a supplementary information distribution channel and are not the only distribution channel of City information.
 - a. Social media platforms change in popularity, features, and cost more frequently than traditional communication channels. The department must have alternate or backup plans to disseminate critical information that is used regularly, in the event the social media platform is no longer a viable option. The City website will always have critical information posted.
5. The initial setup for all City social media accounts will be done by the Information Systems Department with input from the requesting department.
 - a. This will ensure that all official City social media accounts have:
 - i. a government organization setup;
 - ii. a standard naming convention;
 - iii. a consistent look and feel;
 - iv. appropriate security settings;
 - v. "Terms of Use" policies which are clearly visible, or linked from the City website;
 - vi. a link to the City website;
 - vii. a listing on the City's social media webpage;
 - viii. and new accounts are verified by the platform.
 - b. Any security changes to the platform must be approved by ISD prior to implementation
6. If the social media platform allows comments to be posted, the owning department must develop their own Limited Public Forum Policy that states specifically what types of comments are allowed. ISD has a standard template to assist the departments with the development of their Limited Public Forum Policy. The owning department must also monitor their official City social media account(s) daily.
7. Any employee who is using an official City social media account must ask for permission before posting someone's image, information, or intellectual property on the respective platform. Any employee who is using an official City social media account shall not post information about employees, citizens, vendors, patients or clients being served by the City without first obtaining their **written consent**.

Social Media Content Standards

"Everything I post reflects upon me, my employer, and my profession whether on duty or off." - Chief Chris Hsiung, Police Chief, Mountain View Police, CA.

Any employee using an official City social media account to post on a social media platform shall use the following standards:

- Good grammar, spelling, brevity, clarity and accuracy which are essential for every social media post
- When referencing “Official” City business be sure to include a link to the information on the City website
- Public figure pages should follow all other city accounts
- Avoid jargon, obscure terminology, slang, and acronyms
- Do not post any images that are copyrighted without written permission
- Include links that lead users back to official sources on City website(s)
- City employees may not publish content on City social media sites that includes but is not limited to:
 - Information that is not on the City website
 - Information deemed confidential by the City, Department and/or Division
 - Copyrighted material without written permission from the owner
 - Profane, racist, sexist, sexual, or derogatory content or comments
 - Political views
 - Any private views or opinions of a City employee
 - SPAM (unsolicited messages that are commercial in nature)
 - Commercial, private, or political endorsements

Endorsements and Acknowledgments

In some cases, The City of Manchester is allowed to acknowledge businesses, non-profits, individuals or public figures if it pertains to official city business. Under no circumstances should the City endorse any non-city companies, non-profits, individuals or public figures. Definitions and examples of “Endorsements and Acknowledgements” are listed in the Social Media Best Practices Document during training. If you are unsure if your post is an endorsement, please consult the City Solicitors office.

Economic Development

In accordance with the City of Manchester Website Policy, the Manchester Economic Development social media accounts may link to and interact with commercial sites, businesses and individuals for the purpose of promoting economic development in the City of Manchester, NH.

Records Retention

Social media sites contain communications sent to or received by the City and its employees. Such communications may be considered public records and therefore are subject to the Freedom of Information Act and RSA 91-A, also known as “The Right to Know Law”

The following retention requirements apply to all social media posts, comments, and messages, 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:

- 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 media site;
- Social media records are maintained in an authentic, unaltered format along with their complete metadata;
- 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;
- 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);
- Each City employee who administers one or more social media networking sites on behalf of the City has self-service, read-only access to search and produce relevant social media records to fulfill public information and legal discovery requests as needed;
- The City utilizes an automated archiving solution to comply with applicable public records law and fulfill the above record retention requirements.

Moderation of Third Party Content

All official City social media accounts on their homepage or webpage shall contain the following statement, to the extent that inclusion of the statement is possible or practical:

This City social media site serves as a **limited public forum** and all content published is subject to monitoring. As a **limited public forum**, City social media sites must clearly and explicitly state that they are not an open forum, and that they are limited to specific topics and comments. User-generated posts will be rejected or removed by the platform when in violation of the platforms Terms of Use and/or Community Standards. These standards must be regularly, and uniformly enforced. In some cases, this may include reporting a violation to police (example:

threats of physical violence). Violations of the Terms of Use and/or Community Standards include content which:

- Contains slanderous statements;
- Contains obscenity or materials that are of a sexual, or otherwise inappropriate nature;
- Contains personal identifying information or other sensitive personal information;
- Contains offensive terms that target protected classes and are otherwise racist and sexist
- Is threatening, harassing, or discriminatory;
- incites or promotes violence or illegal activities;
- Contains information that reasonably could compromise individual or public safety;
- Advertises or promotes a commercial product or service, or any entity or individual SPAM.

It is the City's policy to NOT DELETE any post, comment or message on social media. In the rare occasion that a post, comment or message is deleted because they violate the Terms of Use, the post, comment or message should be documented prior to deletion. This can be done by taking a screenshot of the comment and post in its entirety, including the name or username of the poster, and properly saving it. This should also include the name of the person who deleted the information and the name of the person who authorized/requested the removal of content. Before removing any content, please consult with the City Solicitor's Office.

NOTE: Content may not be deleted solely because it is negative towards or critical of the City. Content may not be deleted solely because it expresses a certain viewpoint with which the City, or an employee thereof disagrees.

Negative Comments: As a limited public forum, those who manage City social media accounts must be aware of First Amendment concerns and abide by all laws protecting the freedom of expression. City accounts may draw negative or critical comments including from employees or volunteers posting in their individual capacities. When a person posts negative or critical comments to a City social media account on a social media platform which do not otherwise violate the Terms of Use as listed above, rather than remove the comment or post, those managing the social media site should respond respectfully, and if appropriate provide relevant information. This will also protect the City from a violation of public records laws.

[Public Figure Accounts](#)

Public figure accounts are accounts associated with limited public figures. These accounts are maintained by the City and archived separately for each individual that posts to the accounts. Public figure accounts must abide by the same rules as departments and divisions.

Examples:

- Mayor (MHT_Mayor)
- Chief of Police (MHT_MPDChief)
- Fire Chief (MHT_MFDChief)
- Public Works Director (MHT_DPWDirector)

In addition to these public figure accounts there may be instances where a City employee (example: Individual Fire or Police officer) may want to set up an official account. This is not recommended and these individual accounts are not supported by the ISD for set up and archiving. If an individual account is set up it is still responsible for following the City social media policy.

Social Media for Boards and Commissions

Boards and Commissions for the City of Manchester are overseen by the sponsoring department and ultimately the department head.

Official information for these committees can be found on the Manchester City Website and then shared to the appropriate accounts. Boards and Commissions do not have official social media accounts. If they have information to be shared with the public it should first be posted to the City website, then it can be posted through department social media channels with a link to official information. If the department does not have any social media channels, then it can appoint someone to post to the City of Manchester account if necessary.

Members of Commissions and/or Boards shall not respond to, "like", "share", retweet or otherwise participate in any published postings, or use the site or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body.

Compromised Accounts

If you are authorized to post to an official City social media account(s) and your account gets hacked or otherwise compromised in any fashion, you shall immediately inform the ISD by phone or email so that your account can be removed from City pages and passwords and/or access can be reset and restored.

Additional Questions and Comments

If you have questions regarding City social media accounts, you can contact the following:

- Information Systems Department - (603)624-6577
- Human Resources Department – (603)624-6543
- City Solicitor Department – (603)624-6523

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