

Introduction

The Town of Brookline encourages departments and employees to use social media to enhance communications with the public in support of its mission, within the specific parameters as detailed in this policy. This policy sets forth guidelines that Town employees/authorized users must follow when using social media. Questions regarding this Policy should be directed to Human Resources.

This policy addresses two distinct uses of social media:

- a. **Work-Related Social Media Use.** The use of social media that is sanctioned as part of an employee's job function (e.g. when an employee/authorized user posts on behalf of the Town on a Town or other account). This use is addressed in Section 2 of this policy, *Social Media For Work*.
- b. **Personal Use of Social Media.** An employee's personal use of social media (e.g. logging into a personal Facebook™ account and providing personal updates to a personal Facebook™ page while at work during work hours). This use is addressed in Section 3 of this policy, *Personal Use of Social Media*.

“Employee” and “Authorized User” includes those users who are approved by the Town to contribute to or moderate Town social media sites or to provide comments or updates to the Town’s social media identities. “Social media sites” refers to websites that facilitate user participation, networking, and collaboration through the submission of user generated content. “Social media identity” is a specific user identity or account that has been registered on a third party social media site (such as the Whitehouse account on Twitter™ or an employee's personal account on Facebook™) that is associated with the Town, a Town official, or a designated employee. “Social media” in general includes tools such as: blogs, wikis, micro-blogging sites, such as Twitter™; social networking sites, such as Facebook™ and Linked In™; video sharing sites, such as YouTube™; and bookmarking sites such as Delicious™.

1. Employee Responsibilities

It is the responsibility of Town employees who use social media to read, understand, and follow this policy. Users are expected to exercise reasonable judgment in interpreting this policy and in making decisions about the use of the Town’s social media sites and identities. Any person with questions regarding the application or meaning of this policy should seek clarification from his or her Department Head or supervisor. Failure to observe this policy may subject individuals to disciplinary action, up to and including termination of employment.

2. Social Media For Work

A Town social media site or identity may be used only in connection with contributing to the Town's mission. *Personal use of the Town's social media sites and identities is prohibited.*

Purposes of the Town's social media sites and identities consistent with the Town's mission include:

- Targeted communications and media relations
- Promoting and encouraging community engagement and communication with the public
- Providing information about Town resources, operations, services and events

This section outlines the policy for Town of Brookline employees/authorized users contributing to or moderating Town social media sites or providing comments or updates to the Town's social media identities. In addition to the topics addressed below, social media content and use must be in compliance with the Town's existing policies, including, as may detailed below, the Town's Policy on the Use of Information Technology Resources ("IT Use Policy"), the Town's Policy Against Discrimination, Sexual Harassment and Retaliation, and the Town's Policy Against Fraudulent Conduct, Misappropriation and Corruption, and the Town's Terms of Use applicable to public participation on Town social media sites.

Guidelines For Work-Related Social Media Use:

- Follow the Rules.** Follow the Town's IT Use Policy and Terms of Use. It is imperative that employees know and follow the Town's IT Use Policy, Terms of Use, and any additional policies applicable to use of the Town's information technology resources. The Town's social media sites or identities are "information technology resources" under the IT Use Policy.
- Be Respectful.** Abide by the Town's Policy Against Discrimination, Sexual Harassment and Retaliation and otherwise communicate respectfully. Never communicate in a way that a reasonable person would perceive as offensive, harassing, defamatory or insulting. Do not post profane, obscene, or vulgar language or content. Do not post content that promotes, fosters or perpetuates discrimination on the basis of protected class such as race, color, sex, gender identity, national origin, religion, ancestry, age, sexual orientation, disability, maternity leave, genetic information, or military status. Remember that our public includes people of diverse backgrounds, customs, values and points of view. Refrain from topics that may be considered sensitive or objectionable, such as religion and party politics.

- c. **Follow Open Meeting Law Regulations.** The Massachusetts Open Meeting law prohibits a quorum of a public body from deliberating outside of a posted meeting. Be aware that a series of individual postings on a social media site cumulatively may convey the position of a quorum of a governmental body regarding a subject within its jurisdiction, and may constitute improper deliberation among the members of a board or committee.
- d. **Respect Protected Speech.** The Town's social media sites do not accept comments from the public, however, other forms of incoming communications with the Town through social media sites may be possible. Members of the public have some First Amendment rights in posting content to public social media sites hosted by government agencies. Authorized Users should respect those rights with the exception of those comments, messages or other communications excluded for specific legitimate reasons, such as comments that violate the Terms of Use section of the Town of Brookline Policy on the Use of Information Technology. For example, language that incites violence, includes threats, obscenities or are defamatory in nature should be reported to a supervisor and promptly removed.
- e. **Abide by Copyright Law.** Town social media users must abide by laws governing copyright and fair use of copyrighted material owned by others. Never reprint whole articles or publications without first receiving written permission from the publication owner. Never quote more than a short excerpt of someone else's work and, if possible, provide a link to the original.
- f. **Protect Confidential Information.** Employees are prohibited from publishing information that would be non-public record pursuant to the Massachusetts Public records Law if contained in a document, or that is proprietary or otherwise confidential or private under federal and state law, including, but not limited to, the Massachusetts Privacy Law (Mass. Gen. Laws ch. 214, s. 1B), the Massachusetts Fair Information Practices Act (Mass. Gen. L. ch. 66A), the Massachusetts Public Records Law (Mass. Gen. L. ch. 149, s. 52C), Executive Order 504, or other Federal or State privacy laws or regulations. Examples of such information that may not be disclosed include, but are not limited to, information about or reflecting a person's medical or psychiatric condition, criminal record, injury, workplace discipline or other confidential personnel matters, social security or State driver's license number, birthdate, or other private or sensitive information the publication of which the subject could be considered an invasion of privacy.
- g. **Be Transparent.** Social media sites will contain communications sent to or received by Town officials and employees, and are therefore "public records" under the Massachusetts Public Record Law.

Authorized Users of Town social media accounts must be compliant with public records requirements and be aware that all social media comments and messages exchanged with the Town of Brookline are public record. Contact the Town's IT Department or Town Counsel for questions or concerns regarding this requirement.

- h. Correct Mistakes.** If an error is made, be upfront about the mistake and quickly provide the correct information. When appropriate, modify an earlier post to make it clear that content has been corrected and/or edited due to an error. Supervisors should be notified if an authorized user makes and corrects a mistake using a Town of Brookline social media account.
- i. Be Cautious with Content.** As informal as social media sites are meant to be, if they are on a Town domain or a Town social media identity, they are official Town communications. Social media sites will be sought out by mainstream media as well as the general public. Thought needs to go into how to use social media to benefit the Town and the public. Employees/Authorized Users should not comment about rumors, political disputes, or personnel issues, for example.
- j. Identify Yourself.** Be clear when speaking on behalf of the Town. Employees/Authorized Users should identify themselves by name, and, when relevant, role or position in the Town when discussing Town-related matters on a Town social media site or in connection with a Town social media identity. Employees should clearly state when they are speaking for themselves and when they are speaking on behalf of the Town. From time-to-time, Town employees/Authorized Users may be asked on a social media site (such as a blog or wiki) to explain how the Town will apply certain laws, policies or practices to a particular situation. If the response to the question is uncertain and/or involves the employee's interpretation, the employee/Authorized User should first consult their supervisor.
- k. Think Before You React.** The purpose of many social media sites is to communicate information to the public. Employees can expect that some external posts from the public may contain inaccuracies or be negative in tone. Do not engage with the commentator. When you see a misrepresentation made about the Town, consult your supervisor to determine if a response is warranted or necessary.
- l. Media Inquiries.** The Town's social media site or identity may lead to increased inquiries from the media. If an employee/Authorized User is contacted by a reporter, media questions should be referred to the Department Head and/or the Town Administrator's Office.

3. Personal Use of Social Media

- a. Follow the Rules.** Follow the Town's IT Use Policy, if using social media at work. Employees engaging in personal use of social media at work must know and follow the Town's IT Use Policy and any additional Town or Department policies applicable to the use of information technology resources.

In addition, personal use of social media must be in conformity with relevant portions of the Town's workplace policies and all relevant laws and regulations including Town policies against harassment and discrimination, confidentiality policies, ethics rules, code of conduct, and other policies, as well as with state ethics law, Federal Copyright law, and other applicable laws and regulations. Some of these policies, for example the Town's Policy Against Discrimination, Sexual Harassment and Retaliation, could apply to employee actions performed outside of work at third-party sites. Specific departments may have their own supplemental policies on personal use of social media. Employees are responsible for knowing and following any and all such policies.

- b. Speak for Yourself.** Employees' personal use of social media should not be attributable to the Town or to the employee's job function in the Town. Personal use of social media may not be conducted in a manner that would lead a reasonable reader to think that the employee is speaking for or on behalf of the Town. Use of an image of the Town seal, a Town uniform, logo, emblem or other material that specifically identifies the Town or a Town Department must be approved by the Department Head, unless done so for the purpose of engaging in concerted activities relative to workplace issues (for example, wages or working conditions) as may be guaranteed by labor laws. If you communicate on social media in a way that associates yourself with your Town job, you must also communicate that you speak for yourself and not for the Town, for example, a Twitter profile could read "Tweets are my own."
- c. Use Your Best Judgment.** Refrain from personal use of social media sites that could be disruptive to the workplace or to Town operations. This policy is not intended to infringe upon an employee's right to speak publicly as a private citizen on matters of public concern to the extent guaranteed by constitutional provisions on free speech, or to communicate with other employees or employee representatives for the purpose of engaging in concerted (joint) activities relative to workplace issues (for example, wages or working conditions) as may be guaranteed by labor laws - the Town recognizes these rights.

That said, Town employees must consider that their communications using personal social media are or may become public, and may be discoverable in litigation. Personal social media communications have the potential to sow discord in the workplace and interfere with Town operations, where, for example, an employee communicates about sensitive or private matters involving another Town employee or a Town resident, or disparages and harasses another Town employee or a Town resident. Some communications may discredit the Town, the employee or the employee's Department and adversely affect the employee's or Town's effectiveness and operations, for example, where the employee uses gross profanity, comments regarding his or her personal drunkenness or illegal drug use, or posts obscene or sexually explicit material. It is particularly important to be thoughtful about content when you identify your work affiliation (e.g., by disclosing your Town email address). This is an evolving area of the law; therefore, Town employees should use their best judgment at all times when engaging in personal social media use.

- d. **Protect Confidential Information.** Except to the extent that it is their right to do so under the federal and state constitutions and the labor laws as described at the beginning of this Section 3(c), Town employees are prohibited from discussing Town business. In addition, Town employees are prohibited from disclosing non-public record, confidential or propriety information the employee obtained as the result of Town employment. (See Section 2(f) for illustrations.)

4. Social Media Action Plan

Town of Brookline departments that use social media should have a full communications strategy that aligns with the Town of Brookline efforts to engage and inform the public. To effectively fit social media into your communications strategy, departments must complete this Social Media Action Plan (SMAP) that identifies goals, objectives, target audiences, authorized users, resources, and more. If your department does not have a compelling reason to launch a new social media page (see below), you should plan to instead leverage some of Town of Brookline's existing social media pages. Goals for social media pages at the Town of Brookline include:

- Targeted communications and media relations
- Promoting and encouraging community engagement and communication with the public
- Providing information about Town's resources, operations, services and events

Social Media Action Plan

INSTRUCTIONS

Departments and/or workgroups who wish to open a social media account on behalf of the Town must complete this Social Media Action Plan (SMAP). The purpose of the SMAP is to identify the goals, objectives, target audiences, resources, authorized users, supervisors, and more of the social media account(s). If your department/workgroup does not have a compelling reason to launch a new social media page (see below), the SMAP Committee will assist you in leveraging some of Town of Brookline’s existing social media pages. Goals for social media pages at the Town of Brookline (TOB) include:

- Targeted communications and media relations
- Providing information about Town’s resources, operations, services and events
- Promoting and encouraging community engagement

The Town Department Head should complete the Social Media Action Plan (SMAP). Completed SMAP should be submitted to the SMAP Committee, care of Stephanie Orsini, Assistant to the Town Administrator, sorsini@brooklinema.gov. Please allow at least 5 business days for a response from the committee, and plan accordingly. Departments and/or workgroups should expect that their social media action plan will be reviewed on a regular basis by the SMAP Committee to determine if the goals of the communication strategy are being met and if not, how we can work together to achieve those goals.

Section I: Department Information

For all new social media pages, departments must submit this form to the SMAP Committee. It is recommended that each department have a SMAP on record for the social media pages being used to engage the public online.

1. Department:			
2. Your Name:		3. Email:	
4. Supervisor:		5. Email:	
6. Today’s Date:		7. Launch Date:	
8. Provide a brief overview of your overall communication goals, and explain why the social media page(s) you are proposing are a good fit for these goals.			
GOALS:			

Section II: Strategy

Departments should have a full communications plan that includes social media as a part of that strategy. This SMAP is designed to assist you in identifying those goals for any new social media page.

ACCOUNTS	1. What are the specific social media account(s) you would like to open?
	<p>_____ Facebook _____ Twitter _____ Instagram</p> <p>_____ You Tube _____ LinkedIn _____ Other: _____</p> <p>_____ Other: _____ _____ Other: _____</p>
STRATEGY	2. What specific actions will help you achieve the goals?
	<p> </p>
PEOPLE	3 Who is your target audience? How does social media help you reach your target audience?
	<p> </p>
SOURCES	4. Have you considered using existing TOB accounts? How does a new social media account help you in a way that existing accounts do not?
	<p> </p>
ACTIVITY	5. How often do you plan on posting on the each of the ACCOUNTS checked off above?
	<p><i>Draw up guidelines of when you will be posting along with the anticipated number of posts for each account requested. Include whether these posts will be during work hours, after work hours, weekends</i></p>

<p>APPROVED USERS</p>	<p>2. Who is the designated Social Media User (SMU) authorized to use this page? Who is the back-up authorized user? How much time should they spend on maintain this account/accounts?</p> <p>1. Designated SMU: _____</p> <p>2. Back Up SMU: _____</p> <p>3. Other Authorized User: _____</p> <p>4. Supervising Manager: _____</p> <p>5. Estimate the time required for designated SMU's to maintain account(s):</p>
<p>SUCCESS</p>	<p>4. For each account, what does success look like? What objective measures will you use to gauge your performance? How often will you evaluate your performance?</p>
<p>OVERSIGHT</p>	<p>1. Who is the designated supervisor for oversight of the social media accounts and the Social Media Users? How will oversight be provided?</p>
<p>PROMOTION</p>	<p>1. How will you promote and integrate social media into your communications plan?</p>
<p>SIGNATURE</p>	<p>Signed: _____ Date: _____</p> <p>Name: _____ Title: _____</p> <p>Committee: <input type="checkbox"/> Approved Date: _____ <input type="checkbox"/> NOT Approved Date: _____</p>