

# **City of Milwaukee Social Media Policy**

## **BACKGROUND**

The evolution of the internet has increasingly transformed the nature of web site content from static presentation of information to creation of interactive applications that encourage dialogue and collaboration. These two-way applications, otherwise known as “Web 2.0”, include web sites such as blogs, wikis, social networking sites, and video-sharing sites among others.

The City of Milwaukee encourages its departments to communicate, collaborate, and exchange information in support of the City’s mission, using social media technologies. Interactive social media web applications such as Facebook, Twitter, and LinkedIn offer enormous opportunities to City of Milwaukee residents to interact directly with their City government. Using these tools, constituents may request services, report problems in their neighborhoods, or express opinions to elected officials and policymakers. Moreover, by opening more direct channels of communication with residents, the City will enhance its ability to respond more quickly to their needs

These opportunities, however, do not come without risk and potential costs. To ensure proper and appropriate use of these new resources, the City has established the following Social Media Policy. The policy prescribes the actions that employees and representatives of the City must follow when posting in an “official” capacity using social media. It also strives to maintain compliance with state and local laws regarding public records, open meetings, record retention, and elections.

## **GENERAL**

For purposes of this policy, “social media sites” are defined as interactive online pages that allow for and encourage multiple postings or interactions and whose information is constantly altered by its readers and producers. Examples of these sites include blogs, wikis, RSS feeds, and web sites such as Facebook, Twitter, GovLoop, YouTube, LinkedIn, Flickr, MySpace, LiveJournal and others.

Any information or materials posted to such sites by City employees representing the City of Milwaukee using tools provided either by the City or the web site is considered “social media content.” “City-related content” will be determined based on the substance of the information or materials posted rather than the identity of the poster, the equipment used, or the site on which it is posted. For purposes of this policy “City-supported” or “City-sponsored” social media web sites are defined as sites created and/or maintained by designated City employees and used for the purpose of posting City-related social media content.

All official City presence on social media sites is an extension of the City’s existing information systems and networks. To ensure that the City’s website ([www.city.milwaukee.gov](http://www.city.milwaukee.gov)) remains the primary and predominant internet presence for the City of Milwaukee and the central repository for the City’s web-based information, wherever possible, content posted to City social media sites must also be made available on the City’s website. Social media content should contain links directing users back to the City’s official website for in-depth information, forms, documents or online services necessary to conduct business with the City.

## **AUTHORIZATION AND ACCESS**

City departments that choose to participate in social media must designate an individual or individuals who will act as spokespersons for the City and the department on various social media websites. To ensure consistency of message, departments should limit the number of staff personnel authorized to post to social media sites. Employees must have prior authorization to act as a spokesperson for the City before posting official comments regarding City-related business on social media sites. City departments must also ensure that any and all contractors, vendors, or agents of the City who may represent the City in postings to social media sites will comply with all policies, rules, and requirements regarding such actions.

Departments should routinely review access privileges for specific employees to determine if continued access to social media sites remains warranted. Decisions on allowing continued access should be based on the needs of the department and the employee's job responsibilities. The City of Milwaukee reserves the right to deny access to post information on City-sponsored social media sites to any employee or representative of the City who violates this Social Media Policy. Any reference in this document to "employee" or "City employee" shall be considered to include any contractor, vendor, or agent working for or representing the City but not in City employ.

Notwithstanding other provisions of this policy, the policy does not intend in any way to limit or restrict the ability of City employees to speak as private citizens on matters relating to City business. City employees may post comments, questions, or opinions on social media sites, including City-sponsored sites, so long as they make clear that they are acting as private citizens and that their statements in no way represent the official position of the City.

#### OFFICIAL AND ACCEPTABLE EMPLOYEE USE

Once granted access by the department, employees may post to social media sites in an official capacity only information that pertains to City of Milwaukee business or operations. City employees, in their role as designated representatives of the City of Milwaukee, must never post personal information to a City-sponsored social media site. Instead, City representatives who wish to post personal information on social media sites must maintain separate personal pages on sites such as Facebook or Twitter. Personal messages and the like received on an "official" page must be referred to the owner's personal page. Messages relating to City business sent to a personal page must be forwarded to an official City page.

The same principles and policies that govern interactions with the public generally apply also to social media. Employees representing the City of Milwaukee on social media sites must, at all times, conduct themselves in accordance with all state and local laws and all existing City policies. The City requires all employees who participate in social media on behalf of their departments to adhere to and follow all existing work rules and the City's Code of Ethics.

With the exception of elected officials, City employees posting official information to social media sites generally may do so only for the department they represent. They may post information or links to information already published on existing City web pages or social media sites but may not post any new or original materials relating to the activities or operations of other City departments, governments, organizations, or individuals without prior approval from the group or person discussed. City representatives should refer any questions, comments, or discussion outside of their department's responsibility or their personal expertise to an appropriate responder within their own or another City department.

Elected officials, however, hold unique positions in the operations of City government. They must respond to the needs of and answer directly to the constituents who elected them. This requires elected officials to become knowledgeable about all aspects of City government. It also creates expectations that they have the ability to speak on a wide range of City issues and operations, across any and all functional and departmental boundaries. For this reason, elected officials and their representatives are exempt from provisions of this policy restricting employees from posting information regarding other departments.

Employees representing the City of Milwaukee on social media sites must act responsibly in the posting of material and in their online demeanor. Employees must respond honestly to appropriate queries and should not become hostile or argumentative. They should always exercise good judgment regarding the content and potential need for confidentiality (omitting addresses, phone numbers, and other personal data) of posted information.

Employees representing the City must refrain from using social media tools to express personal opinions or concerns. They may never use their access as City representatives to social media sites for personal gain or to promote endeavors of relatives, friends, or associates. Employees and Elected Officials may not post information on City-sponsored social media sites that is protected under copyright, trade secret, or is proprietary in nature without the express written permission from the lawful holder of the information, prior to posting on a City-sponsored site.

Departments must ensure that their employees constantly monitor material posted to social media sites to:

- Respond promptly to questions or replies.
- Replace stale, outdated, and/or incorrect information.
- Remove inappropriate content (as defined below.)

## USER RESPONSIBILITIES

The City of Milwaukee participates in and provides information through social media sites as a public service. The City anticipates that users will use such sites as a means of conveying useful information to and engaging in productive discourse with elected officials, City employees and other representatives.

The City expects that all participants on City-sponsored social media sites, including City employees, other representatives and users will display respect and civility when posting comments or information. The City of Milwaukee reserves the right to remove comments and/or materials solely at its discretion if the City deems that comments and/or materials:

- Are profane, obscene, violent, or pornographic in language or content;
- Promote, foster, or perpetuate discrimination on the basis of gender, race, creed, color, national origin or ancestry, age, disability, lawful source of income, marital status, sexual orientation, gender identity, past or present membership in military service, or familial status;
- Unlawfully defame or attack an individual or group;
- Make direct or indirect threats against any person or organization;

- Support or oppose a political campaign or a ballot measure;
- Advertise or solicit business for a personal or private business or endeavor;
- Promote or endorse any financial, commercial, or non-governmental agency
- Defraud or defame any financial, commercial, or non-governmental agency
- Violate any federal, state, or local law or encourage any illegal activity;
- Violate any existing copyrights, trade secrets, or legal ownerships;
- Compromise the safety and/or security of the public or public systems; or
- Are unrelated to the original topic.

## LEGAL REQUIREMENTS

Public records laws of the State of Wisconsin and local ordinances may require retention of any information, materials, and/or discussion on social media sites that involve City of Milwaukee employees and relate to official City business. Individual City departments will be responsible for ensuring proper retention of content posted by their employees to social media sites.

For purposes of complying fully with existing laws, retention of social media content as public records would likely include any comments, queries, information, or materials submitted by end users, including under certain circumstances, personal information submitted voluntarily such as the user's name and/or address. Departments will retain these records in an accessible and usable format that preserves the integrity of the original records for the period designated by appropriate records retention schedules.

Communication among members of governmental bodies using social media may constitute a "meeting" under the Wisconsin Open Meetings Law. For this reason, members of these bodies are strongly discouraged from interactions with other members on social media sites, including practices such as or similar to "friending."

The rapidly-changing nature of social media sites, both in terms of the technology they use and unpredictable swings in their popularity, would almost instantly render useless any proposals for implementing specific technology for backup and retention of social media content. To assist departments in adjusting to rapid changes in social media sites and Public Records law, the City's Chief Information Officer (CIO) will provide directives to departments regarding the most cost-effective options for retaining and storing specific types of social media content. The CIO will inform departments no less than annually, or more frequently, as needed.

Various social media sites adhere to their own policies regarding the privacy of site users. The City of Milwaukee makes no claim to protect or preserve the privacy of users who interact with employees or representatives of the City via these sites beyond those protections which the site owner provides. Further, the City of Milwaukee retains the right to review all information or materials written or contributed by City employees on City social media sites, therefore designated City representatives should have no expectation of privacy when posting to City social media sites.

The content of all communications posted by City employees on City-sponsored social media sites is the sole property of the City of Milwaukee. Unless prohibited or otherwise provided for by the terms of service enforced by social media sites used by the City, postings made by other users may also be considered City property.

Violation of this policy by a City employee may result in discipline up to and including discharge. Users should be aware that the information made available by the City of Milwaukee on social media sites may not be timely, accurate or complete. Any communication from or to the City through these sites will not be considered legal or official notice for any purpose. The City of Milwaukee reserves the right to revise or modify this policy at any time, without prior notice.