



*City of Milwaukee*

## Social Media Policy

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| NIST Reference:<br>AT – Awareness and Training | Implementation Date :<br>June 1, 2011 | Revision Number :<br>1.0 |
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### SOCIAL MEDIA POLICY

#### PURPOSE

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 platforms including those for sharing updates, short posts, multimedia, photos, videos, community discussions, and professional networking provide significant avenues for Milwaukee's residents to directly connect 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.

The Social Media 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.

#### SCOPE

This policy applies to authorized individuals, designated by department management to act as a spokesperson for the City on various social media channels.

#### GENERAL POLICY

Any information or materials posted to Social Media channels by City employees representing the City of Milwaukee 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 channels on which it is posted. For purposes of this policy "City-supported" or "City-sponsored" social media channels are defined as those 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 channels is an extension of the City's existing information systems and networks. To ensure that the City's website ([milwaukee.gov](http://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.



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#### 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 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.

It is recommended that departments have several staff members with full rights to all social media channels to ensure continuity and maintain access to pages during personnel changes. Account information should be stored securely and shared with other administrators. 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.

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#### OFFICIAL AND ACCEPTABLE EMPLOYEE USE

Special considerations should be made when creating new social media accounts. Prospective content creators should utilize the Social Media Account Request Form and Strategy Plan (available on the MINT) to determine audiences, choose a platform, set goals, and set success metrics for social media engagement. Employees should prioritize the creation of department-specific accounts rather than those focused on individual programs or campaigns. All current City department and elected official account information should be prominently displayed on the "Connect With Us" page of the City of Milwaukee official website ([milwaukee.gov/connect](http://milwaukee.gov/connect)). The link to this policy, <https://city.milwaukee.gov/SocialMediaPolicy>, must be included in the general account information of the social media account so that the audience may easily find the City policy governing use of the account.

Employees should look to guidance, resources, and training from the City's Social Media Collaborators Group to stay current in the continuously evolving social media environment. More details about the group can be found on the MINT Brand Guide and Assets webpage.



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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 posting in an official capacity must have this responsibility listed in their job description. 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. 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.

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.

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 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 existing work rules and the City’s Code of Ethics.

City employees posting official information to social media sites should focus content on the department they represent. When sharing information from other departments, social media managers must make a good faith effort to first check with the department to verify the information they would like to share is correct and relevant. Further, the social media manager should make an effort to mention the department in the post either by tagging, linking to a web page, or listing the department’s name. 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. 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 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).



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#### 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 based on 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;
- Advertise or solicit business for a personal or private business or endeavor;
- Promote or endorse a specific financial or commercial entity.
- 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.

When available, automated keyword filters should only be used to assist removal of comments that are “profane, obscene, violent, or pornographic in language or content.” All comments should be reviewed manually with an objective of viewpoint neutrality.

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#### RECORD KEEPING

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



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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.

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.

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.

City records are prohibited from being permanently stored solely on social media platforms. Only copies of documents may be stored on social media for extended periods. City records (including documents, photos, videos, or any other City record) created for social media are to be transferred by the user as soon as practical to City systems that are routinely backed up and archived.

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#### ACCESSIBILITY

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Milwaukee, Wisconsin, will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. The City of Milwaukee strives to ensure that all forms of communications are accessible to all people.

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#### BRANDING

Social media channels and content must adhere to City of Milwaukee branding guidelines available on the MINT Brand Guide and Assets webpage. City employees posting official information to social media sites should use only approved art



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files to maintain consistent use and ensure the integrity of the City logo. Employees should use square logos designed for social media profile images and City, department, and program logos on social media graphics.

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#### COPYRIGHTED CONTENT

Social media managers must respect third parties' intellectual property rights. City employees must comply with the Copyright Law of the United States of America and related laws contained in Title 17 of the United States Code and other Federal policies and directives when posting images, text, video, and audio files protected by copyright on official OPM blogs or third-party social media accounts.

When using content such as videos or images that are not owned by the City of Milwaukee, social media managers must receive express permission from the owner prior to posting. With permission, City employees must include written credit for the content being used within the post. For City-owned content, such as services provided by the City photographer, written credit is not needed.

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#### SECURITY

City employees posting official information to social media sites should create strong account passwords of at least 12 characters using a mix of uppercase, lowercase, numbers, and symbols. Choose passwords that meet the highest standard of "strength" as indicated by the social media platform. Passwords should not be shared with those who do not have administrative access to the accounts. City employees should use multi-factor authentication whenever possible as an extra layer of security.

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#### POLITICAL ACTIVITY

Elected officials should differentiate between official City accounts and political or campaign accounts by clearly stating the title and purpose of the account prominently on the page. Directives under Section 11.33, Wis. Stats., prohibit the production and distribution of information at public expense by candidates for public office after the first day authorized for the circulation of nomination papers for an election. These restrictions also apply to city staff acting on behalf of a candidate, as outlined in Hatch Restrictions: Employees must avoid certain types of political activities that are prohibited by the Hatch Act, 5 U.S.C. §§7321-7326, including engaging in political activity while on duty and soliciting political contributions. Guidance includes the following:

- Mailings: No mailing of 50 or more pieces of substantially identical material may be made. It is not permissible to mail substantially identical pieces on different days if the total is 50 or more.
- Mailings such as liquor license surveys or notices relating to special assessment matters (if 50 or more copies are required) may be sent by the City Clerk on department letterhead at a Council member's request.



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- Distribution of Materials: Section 11.33 also applies to the distribution for campaign purposes of any business cards, pamphlets, reports, or other material that has been produced at public expense.
- Electronic Media: Section 11.33 also covers electronic mail, social media tools and city web pages. Therefore the following are prohibited by elected officials who are candidates for office:
  - The distribution of 50 or more substantially identical e-mail messages or a single email to 50 or more recipients.
  - Use of E-Notify.
  - Posting to a city-sponsored social media site.
  - Posting to a city sponsored social media site from city-owned devices.
  - Use of city-sponsored text alerts.
  - Updating an elected official’s web page. (The City Clerk’s Office may continue to post information on the city’s web site pertaining to official business.)
- Aldermanic E-Notify categories will be shut down and all links to social media sites and city text alerts will be removed from aldermanic web pages. These will be restored when the council member is no longer a candidate.

**EXCEPTIONS**

Exceptions to this Policy for mission essential functions or for law enforcement purposes must be filed with and approved by the CIO.

**ENFORCEMENT**

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.

**REVISION HISTORY**

| Revision | Date           | Changes  |
|----------|----------------|--|
| 0.0      | June 1, 2011   | Initial Release  |
| 0.1      | July 8, 2019   | Format Revision, Background and General Information edited to remove outdated information. |
| 1.0      | September 2023 | Updated Content  |