

Policy Number Section II-14	USING SOCIAL MEDIA TO COMMUNICATE WITH THE PUBLIC	Adopted: 10-25-12
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- 1) The purpose of this policy is to establish the Grand Traverse County Road Commission’s policy for using and utilizing social media intended for external use to communicate with the public regarding Road Commission matters.
- 2) The Manager and/or Board will designate employee(s) eligible to post on social media sites on behalf of the Road Commission.
- 3) All postings must conform to internal/external communication policies and must not violate any laws and/or existing Grand Traverse County Road Commission (“Road Commission”) policies and Employee Handbooks.
- 4) The objective and purpose of utilizing Social Media is to educate and inform both employees and the public on relevant Road Commission topics in order to meet its mission to upgrade and maintain a safe and efficient road system. The Road Commission establishes its Social Media sites as a limited public forum for such purposes.
- 5) All social media (Internet, Facebook, Twitter, etc.) postings, whether done on a Grand Traverse County Road Commission site or a personal site when acting in an official capacity on behalf of the Road Commission must be done in an accurate, professional manner without any expectation of privacy. This policy does not apply to Road Commission employees using social media in their personal capacities.
- 6) When you are working in your official capacity while online, you are representing the Road Commission. Remember that you are “speaking” for the Road Commission when you are working in your official capacity. Set forth below are several general ethics areas of concern:
 - a. Do not say anything online that you would not say in a speech in your official capacity.
 - b. Do not misuse your Road Commission position for your own gain or to help others inappropriately.
 - c. Do not endorse any product, service, company, non-profit organization or any other enterprise unless specifically authorized to do so by the Road Commission Board.
 - d. Do not divulge nonpublic information. This includes any information designated as confidential, privileged, or any other type of information that may not be disclosed, even if someone else asks you for it.
 - e. Do not engage in any partisan political activity.
 - f. Do not fundraise for any organization.
 - g. Do not utilize the Road Commission Social Media site to engage in political activity prohibited under the Michigan Campaign Finance Act, MCL 169.257.
- 7) Posts should aim to be personable, open, responsible and courteous while offering useful or thought-provoking ideas.
- 8) Be thoughtful when posting pictures and video of people. While there is no expectation of privacy at a public event, be aware that there could be restrictions around whose photo you post depending on the circumstances and venue. Photos of minors shall not be posted without parental consent.
- 9) Misuse of this privilege may result in disciplinary action.
- 10) Except for content set forth in paragraph 13 below, all public postings from all persons or entities related to the purpose of the site will remain on the social media site with an appropriate response as indicated. The Road Commission as a governmental entity may not discriminate based upon the viewpoint of the speaker or speech.
- 11) As needed, the designated employee(s) will confer with staff on subject matters requiring more detailed or politically sensitive responses.
- 12) Should inaccurate information be posted, timely acknowledgements and corrections will be made.
- 13) Content submitted to a Road Commission Social Media site shall be moderated by a trained moderator. The moderator will ensure that posted comments containing any of the following form of content shall not be allowed for posting:
 - a. Comments that are in violation law or encourage violation of law
 - b. Comments that promote, foster, or perpetuate discrimination on the basis of race, religion,

gender, marital status, familial status, national origin, age, mental or physical or other protected status under applicable law.

- c. Comments or links to sites that contain obscene, indecent, sexual, or profane language or material.
 - d. Comments that contain threats or defamatory statements.
 - e. Comments that solicit commerce or promote or endorse services or products.
 - f. Information that may tend to compromise the safety or security of the public or public systems.
 - g. Content that violates a legal ownership interest of any person or entity, including the posting of copyrighted material.
- 14) Individuals who consistently violate these guidelines will be blocked as users on Road Commission Social Media sites.
- 15) Content submitted for posting that is removed by the Road Commission moderator shall be retained pursuant to the Road Commission records retention schedule along with a description of the reason the specific content was deemed not suitable for posting.
- 16) Anonymous postings shall not be allowed.
- 17) All Road Commission Social Media sites should contain a statement notifying commenters that their comments are being moderated pursuant to this policy and may be removed for the reasons set forth in this policy, their comments and the information provided in connection with their comments, including identification information, may be subject to disclosure under the FOIA or in litigation, and by submitting their comments they are granting the Road Commission or anyone viewing the Social Media site irrevocable permission to copy, distribute, make derivatives, display or perform the submitter's work publicly and free-of-charge.
- 18) All content posted on any Road Commission Social Media site shall be retained as a public record pursuant to the Road Commission's record retention policy.