

**SOCIAL MEDIA/WEBSITE COMMENT POLICY – TOWNSHIP OF WASHINGTON,  
GLOUCESTER COUNTY, NJ**

## Purpose

This policy sets forth guidelines for the establishment and use by the Township of Washington (“Township”) of all social media sites (including but not limited to Facebook, Instagram, and Twitter) as a means of conveying the Township of Washington-related information to its residents, employees and visitors.

For purposes of this policy, “social media” is understood to be the content created by individuals, using accessible, expandable and upgradable publishing technologies, through and on the Internet. Examples of social media include Facebook, blogs, RSS, YouTube, Second Life, Twitter, LinkedIn, Instagram, and others. For purposes of this policy, “comments” include information, articles, pictures or other information posted by any person or entity other than the Township.

## Scope

This policy shall apply to all Municipal agencies and departments as well as any affiliated government or non-government agency or official permitted by the Township to post on Township social media sites.

## General Policy

1. The establishment and use by any municipal department of the Township’s social media sites are subject to approval by the Township Administrator or his/her designees. All Township social media sites shall be administered by Washington Township’s Information Technology (“IT”) staff or designated third party provider.
2. The Township social media sites should make clear that they are maintained by the Township and that they follow this Social Media Policy.
3. Wherever possible, the Township social media sites should link back to the official Township website for forms, documents, online services and other information necessary to conduct business with Washington Township.
4. The Township shall designate an employee or volunteer to monitor content (the “Social Media Coordinator”) on the Township social media sites to ensure adherence to both this Social Media Policy and the interests and goals of the Township. Washington Township has the right and will restrict or remove any content that is deemed in violation of this Social Media Policy or any applicable law. Any content removed based on these guidelines will be retained by the Social Media Coordinator pursuant to the applicable

Township retention policy, including the time, date and identity of the poster, when available.

5. These guidelines must be displayed to users or made available by hyperlink.
6. The Township will approach the use of social media tools as consistently as possible, enterprise wide.
7. The Township website at [www.townshipnj.com](http://www.townshipnj.com) will remain the Township's primary and predominant internet presence.
8. The Township social media sites and this Policy are subject to all applicable federal and NJ laws and regulations, including the Open Public Records Act, as well as applicable record retention requirements.
9. Any content maintained in a social media format that is related to the Township's business, including a list of subscribers, posted communication, and communication submitted for posting, may be a public record subject to public disclosure.
10. Employees representing the Township's government via its social media sites must conduct themselves at all times as a representative of the Township and in accordance with all its policies.
11. This Social Media Policy may be revised at any time.

## Comment Policy

1. As a public entity, the Township of Washington must abide by certain standards to serve all its constituents in a civil and unbiased manner.
2. The intended purpose behind establishing the Township social media sites is to disseminate information from the Township, about Washington Township, to its residents, employees and visitors.
3. Comments containing the following inappropriate forms of content shall not be permitted on The Washington Township social media sites and are subject to removal and/or restriction by the Township Administrator or his/her designees:
  - a. Comments not related to the original topic, including random or unintelligible comments;
  - b. Profane, obscene, violent, or pornographic content and/or language, or sexually suggestive or links to such materials. Any image or link containing minors or suspected minors in sexual situations will be reported to law enforcement.
  - c. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, or national origin, marital status, status with regard to public assistance, physical or mental disability or sexual orientation;
  - d. Defamatory or person attacks;
  - e. Threats to any person or organization;
  - f. Comments in support of, or in opposition to, any political campaigns or ballot measures;
  - g. Solicitation of commerce, including but not limited to advertising of any business or product for sale;

- h. Postings in violation of any federal, state, or local law or social media company rules and regulations;
  - i. Encouragement of illegal activity;
  - j. Information that may tend to compromise the safety or security of the public or public systems; or
  - k. Content that violates legal ownership interest, such as a copyright. The Township does not permit or allow copyright infringing activities and/or infringement of intellectual property rights on its website or social media sites and will remove any and all content and Submissions if properly notified that such content and/or Submission infringes on another's intellectual property rights.
  - l. Private contact information such as names, addresses and phone numbers no matter how easily obtained elsewhere.
  - m. Photographs or videos.
  - n. Personal information of a person other than the poster.
  - o. Spamming or repetitive content.
  - p. Comments from children under 13 cannot be posted in order to comply with the Children's Online Privacy Protection ACT. By posting on a Township social media site, users acknowledge that they are at least 13 years old.
4. A comment posted by a member of the public on any Township social media site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of, or agreement by, the Township, nor do such comments necessarily reflect the opinions or policies of the Township.
  5. Any attempt to hack or otherwise compromise the Township's internet or social media sites will be reported to law enforcement and the perpetrator will be denied access to the sites.
  6. The Township reserves the right to deny access to its social media sites for any individual, who violates the Township's Social Media Policy, at any time and without prior notice.
  7. Municipal Departments shall monitor their social media sites for comments requesting responses from the Township and for comments in violation of this Policy.
  8. When a Township employee responds to a comment, in his/her capacity as a Township employee, the employee's name and title should be made available, and the employee shall not share personal information about himself or herself, or other Township employees.
  9. All comments posted to any Township Facebook site are bound by any applicable terms and conditions Facebook's Statement of Rights and Responsibilities, located at <http://www.facebook.com/terms.php>, and the Township reserves the right to report any violation of Facebook's Statement of Rights and Responsibilities to Facebook with the intent of Facebook taking appropriate and reasonable responsive action. All Township policies are applicable to interactions on the social media sites when acting in the official capacity and representing the Township.
  10. No "friending" or other special relationship between a Township employee and a third person is permitted.

11. Social media sites are not to be used for making any official communications to the Township, for example, reporting crimes or misconduct, reporting dangerous conditions, giving notice required by any statute ordinance or regulation (e.g. notice of claim). Prominent notice of this paragraph shall be displayed on every Township social media site, along with the appropriate contact information for submitting such a communication.

## Breach of Policy

1. Breach of this Policy by any Township employee may result in disciplinary action up to and including dismissal. Any evidence of such occurrence shall be immediately referred to the Township Administrator for review and prompt corrective action if confirmed.
2. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether our equipment or facilities are used for the purpose of committing the breach.
3. Any member of staff suspected of committing a breach of this policy will be required to cooperate with our investigations, which may involve handing over relevant passwords and login.
4. Staff may be required to remove internet postings which are deemed to constitute a breach of Policy, as determined by the Township Administrator, subject to applicable archiving and retention requirements.
5. Any Township social media site created, administered or maintained by a Township employee or volunteer remains the property of the Township, including all the followers and friends generated by the site. If the person who created the site leaves the employment of the Township, they must relinquish everything related to the site including user names and passwords.

## Terms of Use Disclosure (to be posted on all Township Social Media Sites)

### A. Information Disclaimer

By visiting this site, you understand and agree that the Washington Township government site is provided "AS IS". Washington Township government makes every effort to provide accurate and complete information on this website. The information contained herein is not official nor in any way shall it be deemed to constitute legal notice where such legal notice is required by law. The information contained in this site is provided as a service and convenience to people needing information about the Township of Washington government. Portions of the information on this site may be incorrect or not current. Township of Washington government, its officers, employees or agents shall not be liable for damages or losses of any kind arising out of or in connection with the use or performance of information, including but not limited to, damages or losses caused by reliance upon the accuracy or timeliness of any such information, or damages incurred from the viewing, distributing or copying of those materials.

### B. Linking Policy

#### Links TO External Sites

The Township of Washington government site contains links to outside websites. These websites are not owned, operated, controlled or reviewed by the Township of Washington government. These links are provided solely as a courtesy and convenience to you, the visitor.

The Township of Washington government, its officers or employees, exercise no control over the organizations, views, accuracy, copyright or trademark, compliance or the legality of the material contained in these outside websites. The Township of Washington government, its officers or employees, do not sponsor, endorse, or approve the information, content, proceeds, materials, opinions or services contained on such outside websites. The visitor proceeds to these outside websites at his/her own risk. The Township of Washington government specifically disclaims any and all liability from damages, which may result from the accessing of a third-party site, which is linked to the Township of Washington government website or from reliance upon only such information.

### C. Endorsement Disclaimer

Reference in this website to any specific commercial products, processes, or services, or the use of any trade firm or corporation name is for the information and convenience of the public, and does not constitute endorsement, recommendation, or favoring by the Township of Washington government or its officers, employees or agents.

### D. Copyright and Trademark Limitations

Township of Washington government makes no warranty that materials contained herein are free of copyright or trademark claims or other restrictions or limitations on free use or display. Making a copy of such material may be subject to copyright or trademark laws.

### E. Use of Material from this Site

The Township of Washington government has made the content of these pages available to the public and anyone may view, copy or distribute *Township of Washington government information* found here without obligation to the Township of Washington government for non-commercial, personal use only, unless otherwise stated on particular material or information to which a restriction on free use may apply.

The design of this site, original graphics, and original content are all copyrighted by the Township of Washington and may not be re-engineered, distributed, modified, transmitted, re-used, reposted, or duplicated without the express written permission of the Township of Washington in each instance. All requests to use any part of the original design, code, graphics or content of this site should be made via e-mail to the Township Administrator.

### F. Unauthorized Modifications

Unauthorized attempts to modify or otherwise alter any information or image stored on any Township of Washington government website may result in criminal prosecution.