

# MEMO

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Date: November 14, 2022

To: Historical Commission, EAC

From: Jon Altshul, Township Manager

Re: Consider Draft Social Media Policy

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At its meeting on November 7, the Board of Supervisors asked for feedback from the Commissions on the attached draft social media policy prior to the Board considering the matter for adoption.

**1. General Policy**

- 1.1. The Westtown Township website is the primary means of online communication with Township residents and the public. The Township's official social media presence will serve to supplement its website and should direct visitors back to the website as appropriate.
- 1.2. The Township recognizes that a social media page may contain third party content including, but not limited to, advertisements or hyperlinks placed by the social media site owners or their vendors, over which the Township has no control. The appearance/occurrence of such content does not indicate endorsement by Westtown Township, its employees or its Board of Supervisors.
- 1.3. Participation in social media is on a voluntary, as needed basis at the will of the Township. The Township reserves the right to terminate any Township social media participation at any time without notice.
- 1.4. The Township Manager shall designate a staff member to serve as the Account Manager of all Township social media accounts. The Account Manager shall be responsible for posting all content to the Township's social media accounts, and ensure compliance with this policy, in consultation with the Township Manager.
- 1.5. Except for video sharing platforms, such as YouTube, Advisory Commissions to the Board of Supervisors are not permitted to have their own social media accounts. However, all video sharing platforms associated with Advisory Commissions shall be subject to this policy, including content review by the Account Manager.
- 1.6. The Township Manager shall have final decision-making authority over compliance with this Policy.

**2. Content Guidelines**

- 2.1. The content of Township social media shall only pertain to Township-sponsored, Township-endorsed, or Township-recognized programs, services, events, and/or notifications. Content recommended by Township Advisory Commissions shall be consistent with programs, services, events, and/or notifications that have been discussed and generally agreed to in public meetings with the Board of Supervisors.
- 2.2. The Account Manager may not express his or her personal views or concerns on Township social media accounts. Social Media posts shall only reflect the specific factual communications of the Township. The Account Manager's goals shall be in line with basic objectives outlined in this policy.
- 2.3. The Account Manager shall observe and abide by all copyright, trademark, and service mark restrictions in posting materials to social media.
- 2.4. Consistent with Township Resolution 2020-14, the Account Manager shall delete video recordings of public meetings on the Township YouTube page (or successor platform) after 180 days of the recorded meeting date. However, posted video recordings of events or activities other than public meetings shall not be subject to deletion pursuant to Resolution 2020-14
- 2.5. Posts on Township social media pages shall not contain any of the following:
  - 2.5.1. Content that is not appropriate for all ages
  - 2.5.2. Remarks in support of, or opposition to, political campaigns, candidates or ballot measures.
  - 2.5.3. Statements or facts that cannot be readily verifiable. As a general rule, technical or science-related statements or facts should be supported by federal or state government sources.

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- 2.5.4. Profane language or content.
  - 2.5.5. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, or status with regard to public assistance, national origin, physical or mental disability, or sexual orientation.
  - 2.5.6. Threats to any person or organization.
  - 2.5.7. Sexual content or links to sexual content.
  - 2.5.8. Gambling or related content.
  - 2.5.9. Conduct or encouragement of illegal activity or content in violation of any federal, state or local law.
  - 2.5.10. Information that may compromise the safety or security of the public or public systems.
  - 2.5.11. Promoting or advertising a commercial enterprise or business or commercial solicitation (unless deemed as a benefit for Township sponsorship by the Township Manager).
  - 2.5.12. Content that violates a legal ownership interest of another property.
  - 2.5.13. Remarks of a personal or private business nature.
  - 2.5.14. Content posted by automatic software programs or bots.

### 3. Moderation of Comments

- 3.1. Certain social media platforms may, but are not required to, allow for comments. Comments posted on a Township social media page shall be monitored and moderated by the Account Manager.
  - 3.1.1. The Township Manager may disable comments on a case-by-case basis
  - 3.1.2. Comments which violate Section 2.5 *supra* of this policy shall be deleted or otherwise removed by the Account Manager.
  - 3.1.3. The Township reserves the right to block comments from social media users who violate this policy. Users must also comply with all terms of use established by the social media provider or platform. Any content removed based on this policy must be retained in accordance with the applicable Township retention schedule, with proper memorialization of the time, date and identity of the poster, when available.
  - 3.1.4. Comments or concerns expressed on the social media sites do not serve as official communication to the Township. To officially report a concern, residents should contact the Township by phone (610-692-1930) or by the email addresses available on the Township's website ([www.westtownpa.org](http://www.westtownpa.org)).
  - 3.1.5. Notwithstanding 3.1.4 *supra*, the Account Manager shall review comments regularly to determine if the comment requires an official reply from the Township.
- 3.2. Comments which include any of the following shall be deleted, hidden, or otherwise removed by the Account Manager:
  - 3.2.1. Obscene, profane, vulgar, threatening, harassing, or defamatory language.
  - 3.2.2. Comments in support of, or opposition to, political campaigns, candidates or ballot measures.
  - 3.2.3. Personal attacks against other commenters, Township staff, or Township elected officials.
  - 3.2.4. Comments which violate copyright law.
  - 3.2.5. Comments promoting or advertising a commercial enterprise or business.
- 3.3. Township social media sites are subject to Pennsylvania public records laws. Any content maintained in a social media format that is related to Township business, including the list of subscribers and posted communications, is a public record. Content related to Township business

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shall be maintained in an accessible format so that it can be produced in response to a request. Wherever possible, such social media sites shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure. Furthermore, State and Township record retention schedules apply to social media formats and social media content. The Township shall preserve records required to be maintained pursuant to the applicable Township record retention scheduled for the required retention period on a Township server in a format that preserves the integrity of the original record and is easily accessible.

#### 4. Use of Personal Social Media Accounts

4.1 Township staff and appointed members of Township Commissions are encouraged to use their personal social media accounts to post content that publicizes scheduled Township events or activities, as this is an effective compliment to the Township's marketing and public information activities.

4.2 Notwithstanding 4.1 *supra*, Township staff shall not use their personal social media accounts to discuss or comment on Township business, decisions, policies or events or to advocate for or against policy questions that are before the Board of Supervisors or may reasonably come before the Board of Supervisors in the future. Violations of this provision are subject to the Section 703 ("Progressive Discipline") of the Employee Handbook

4.3 Also not withstanding 4.1 *supra*, appointed members of Township Commissions are reminded that they are representatives of the Township in their appointed capacity. As a best practice, members of Township Commissions shall not use their personal social media accounts to discuss or comment on Township business, decisions, policies or to advocate for or against policy questions that are before the Board of Supervisors or may reasonably come before the Board of Supervisors in the future, while representing themselves as members of a Township Commission.

At the time of publication, Westtown Township maintains the following social media accounts:

- <https://www.facebook.com/WesttownTownshipPA/>
- [https://www.youtube.com/channel/UCpeMKfH\\_U\\_VpJ7FHo0TkwtA/videos](https://www.youtube.com/channel/UCpeMKfH_U_VpJ7FHo0TkwtA/videos)