



City of Boston

# Social Media Policy

Digital Engagement Roadmap for City of Boston Government Social Media

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# **City of Boston Social Media Policy**

***Updated 3. 14; Prepared by L. Crudele***

## **Introduction**

This policy exists in order to provide guidance, best practices and a common mission for the administrators of the City of Boston’s broad social media catalog. Guidelines support consistency, security, engagement and efficiency. Given the rapidly evolving landscape of digital media, guidelines are subject to change through the oversight of the Community and Social Technology Strategist (heretofore referred to as the “CSTS”) via the City of Boston Department of Innovation and Technology. Guidelines are intended to foster engagement between the City of Boston government and constituents in order to improve quality of life and a basis for consistent and reliable operation; Social Media Liaisons are encouraged to provide feedback in order for this document to best support their goal as stewards of public service and constituent engagement.

## **City of Boston Social Media Mission Statement**

The City of Boston broadly embraces social media as a tool to educate, increase access to City services, encourage community engagement, and increase transparency. Social media offers the opportunity to better understand the community we serve, and offers a rapid method for information transmission. The City of Boston Social Media Liaison team adheres to social media best practices in order to most effectively meet these goals.

## **Social Media Policy**

### **A. Definition of Social Media**

Scalable, universally-accessible web and mobile technologies used in the transfer of user-generated content, including conversations and other types of media.

*Examples of common social media platforms include*

- social networks (Facebook, LinkedIn);
- blogs (Wordpress), microblogs (Twitter, Tumblr);
- social curation (Reddit, Pinterest);
- media sharing (YouTube, flickr, Vimeo, Instagram).
- crowd funding (Kickstarter, IndieGogo)

## Applicability:

Policy applies to all existing and future social media accounts representing departments, programs, initiatives or individuals acting on behalf of the City of Boston. City of Boston social media accounts are City of Boston property, subject to public records and ethics law, and access may be revoked in the event of improper operation, guidelines to follow.

## **B. Social Media Team Structure**

### *Community and Social Technology Strategist:*

This position, housed in the City of Boston Department of Innovation and Technology, will oversee all City account activity in the following manner, including but not exclusive to:

- Oversee citywide social media usage
- Guide Social Media Liaisons, stationed across departments, in the creation and operation of social media accounts & campaigns
- Provide training and guidance
- Research, designate and deliver approved tools for social media operations
- Maintain inventory of City social media properties
- Have direct access to all City social media accounts
- Enforce adherence to Social Media Guidelines

### *Social Media Liaisons:*

Social Media Liaisons are designated staff members, working in concert with an agency/department's communication strategy, who have administrative access to any official City of Boston social media presence.

#### *Use of Social Media Liaison Distribution List:*

Email distribution list is to be used by liaisons to receive CSTS-distributed information toward the goal of consistency and adherence to best practices. Liaisons should submit requests for distribution to CSTS.

## **Basic requirements for City of Boston accounts**

### **Creation of new social media presence**

- Social liaisons must consult with CSTS before creating or embarking in the operation of any social media account or tool.

- a. **Consultation.** Upon embarking on an anticipated social media initiative, departments must notify the CSTS and complete a consultation. The Social Media Liaison & CSTS will work together to create a social media strategy to best express goals. The consultation will include an evaluation of the request, identification of appropriate tools, and an authorization for staff to administer an account along with appropriate support.
  - i. Whenever possible, use a boston.gov registered email address to register an external account.
  - ii. Google Hangouts on Air & Google products: In accordance with policy wherein social media activity shall be linked to Boston.gov accounts, all Hangout activity must be requested through CSTS, who will work with Google team to authorize user access to functionality. User and CSTS will identify the appropriate channel to house archived video activity; any subsequent episode of Hangout on Air activity must also be requested and approved via CSTS. As in the creation of any new social asset, all social sharing functionality of Google products, including Google+, shall not be initiated without prior approval of CSTS.
- The Social Media Liaison will submit the following information to the CSTS:
  - Name of all account administrators
  - All login information required to access account, including originating email account.
  - Facebook account admin privileges
  - Signed Creative Brief
  - Signed “New Asset Agreement” form
- Every City of Boston Social Media account must contain the following content in their profile:
  - Clearly-branded department name or function. *Twitter:* amend with “BOS.”
  - Appropriate official visual identity: a logo as avatar, or in the event a department lacks a logo, an appropriate representative photo will be chosen. CSTS may work with liaison to obtain or develop such collateral. Reserve City Seal use for @Notifyboston. CSTS will provide guidance for updated formatting.
  - Link to official boston.gov departmental homepage.

### **Operational Overview**

1. Each agency is responsible for generating its respective source content and maintaining daily operation and publication to social media outlets. Please designate at least one deputy administrator who will support social media efforts when the lead is on vacation or there is a change in personnel in order to avoid gaps in communication.

2. The CSTS reserves the right to access any City of Boston account in order to amplify content or distribute emergency information.
3. Social media accounts, their use, and all information that they contain must be consistent with applicable state and federal laws, as well as local laws, regulations, and policies (including all information technology security policies).
4. A Social Media Liaison may not release any information of a nature that has not been approved for public distribution, nor any information relating to the unauthorized identification of private persons, such as home address or medical status, as well as content that violates intellectual property and copyright terms of others.
5. Every operator of a City of Boston social media property must submit to CSTS a completed Receipt of Social Media Policy form, available at the end of this document and in the City of Boston document library on the Hub.

### **Constituent Service Requests and Questions**

1. If a subject expert is not located in your immediate department and cannot resolve a question directly, please consult with Constituent Services for assistance before directing the constituent to call 4500. Set their expectations: reply that you are investigating further and will get back to them soon. If the setting is Twitter, reply by ccing @notifyboston.
  - i. Example: @YOURFEED: @constituent, I'm not sure, but let's confer with @notifyboston MT: @constituent I'm having trouble paying my parking ticket online.
  - ii. Set expectations for timeframe and answer requests within 24 hours, even if to inform that you are investigating a full answer.
2. For most accounts, it is reasonable to operate mostly during business hours, though it is highly advisable to employ content scheduling in order to extend reach beyond a typical workday. However, please reply **within 24 business hours**.

### **External Terms of Service**

It is the responsibility of the Agency user(s) to read and understand each social media platform's Terms of Service prior to the creating of a social media account. By creating an account via third party social media such as Facebook or Twitter, each user is subject to the platform's respective Terms of Service in addition to any guidelines set by the City. Be aware of rights management terms for sites that may reserve the right to transfer uploaded content; in order to avoid copyright infringement, rely on original content. Carefully observe guidelines for operating contests, which may be informed by legal requirements or other restrictions, the violation of which could result in account termination by the provider.

## **Comment management & Official External User Terms**

1. City of Boston agencies offer the following guidelines for comments (such as those posted to a Facebook page), which should be included in social media profiles as this link: <http://bit.ly/soctos>. Full text:

### ***Social Media Terms of Use for Visitors***

*Your engagement makes the City of Boston a better place. The City of Boston welcomes conversation but reserves the right to moderate comments in accordance with City policies. All social media comments and messages exchanged with the City of Boston are public record.*

### ***Conduct***

*We expect conversations to follow the rules of polite discourse and we ask that participants treat each other, as well as our employees, with respect. Comments may be monitored and may be subject to removal based on, but not limited to, the following qualities: comments featuring profanity and vulgar or abusive language; sexually harassing content; obscene content; threats of physical or bodily harm; discriminatory language on the basis of race, gender, ethnicity, national origin, sexual orientation, gender identity or expression, disability, age, marital status, or religion; and content of a commercial nature. Comments straying from the designated topic may also be subject to removal.*

### ***Copyright***

*Users agree to grant a non-exclusive, irrevocable, royalty-free license to the rest of the world for their submissions to this site under the Creative Commons Attribution 3.0 License. A copy of this license is available [online](#).*

*The City of Boston respects the intellectual property of others, and we ask users of our Social Media sites to do the same. In accordance with the Digital Millennium Copyright Act (DMCA) and other applicable law, we have adopted a policy of terminating, in appropriate circumstances and at our sole discretion, users, subscribers, or account holders who are deemed to be repeat infringers. We may also at our sole discretion limit access to our site and/or terminate the accounts of any users who infringe any intellectual property rights of others, whether or not there is any repeat infringement.*

*If you believe that any material on this site infringes upon any copyright which you own or control, or that any link on this site directs users to another Web site that contains material that infringes upon any copyright which you own or control, you may file a notification of such infringement with our Designated Agent as set forth below. Notifications of claimed copyright infringement must be sent to the City of Boston's Designated Agent for notice of claims of copyright infringement. Our Designated Agent may be reached as follows:*

*Jose Gonzalez, Designated Agent  
City of Boston Legal Department*

P: 617-635-4936

E: [Jose.Gonzalez@boston.gov](mailto:Jose.Gonzalez@boston.gov)

## **Privacy**

*With respect to content collected through this site, the City of Boston follows its [Privacy Policy](#). For content collected via external sites, please refer to a social media platform's respective Terms of Service policy.*

*To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as social security numbers, driver's license numbers, financial account numbers, credit or debit card numbers, or phone numbers in your comment.*

- 2. If a comment is subject to removal, a screenshot of the original comment must be taken and forwarded to the CSTS, dated with written explanation. The CSTS will maintain a record of such deletions.*

## **Security**

### *Passwords*

Social Media Liaisons should use strong passwords; combinations of characters that do not reference words found in the dictionary, personal information, or the account's information, are best, and should utilize a spectrum of character types. Do not share a password with anyone other than another authorized user whose name has been submitted to the CSTS, and the CSTS. Do not authorize anyone else as an account administrator without seeking approval from the CSTS.

- Avoid strings that can be found in a dictionary: hackers use dictionaries to crack passwords. Using *special characters* in your password (the characters above the numeric on the keyboard, such as the ampersand (&), pound sign (#), and percent sign (%), is an effective way to ensure you don't have a password that is in a dictionary. Some ways to use special characters are:
  - Substitution: Substitute letters with *special characters*, such as swapping an asterisks ("\*") for "O"s or the at sign ("@") sign for "A"s
  - Padding: Pad the password with *special characters*, such as adding a dollar sign ("\$\$") at the start and end of the password
  - Pass Phrase: Construct a password phrase, i.e. choose a sentence you like, use the first letter of each word for the password, and then do additional special character substitution.

- Once you construct a strong password then you can use that as your root password and customize it (with a suffix or prefix) for each instance of the password for use on other web sites or applications. For example, you could add the suffix “#AMZ” at the end for the Amazon instance of your root password.
- Change your password at least every 90 days.
  - When an administrator leaves their position, remove administrative access to the social account, changing passwords where applicable at that time.
- Use passwords at least eight (8) characters long
- The City of Boston *Password Policy* can be found in the Document Library on The Hub, which contains a complete list of password guidelines.

### *Phishing*

1. Never respond to emails or direct messages (DM) requesting that you modify an account via email, enter your account credentials, or other such prompt. Instead, visit the home site directly. If such a DM appears and you suspect the content may be of valid concern, contact the sender directly via another means to confirm. If you have received a suspicious message from another member of the social media team, please inform them, as well as the CSTS, via alternate means such as email or telephone.
2. Regularly review the home feeds, outboxes and “favorite” fields of your social accounts to make sure nothing has been published without authorization.
3. In the event that an account has been compromised, such as when a user has identified an account sent unauthorized Direct Message SPAM, follow these steps:
  - i. Change account password to new, strong password
  - ii. Review authorized external apps
  - iii. Update password where needed via social media management platforms
4. In the event that such an event has produced an unauthorized public communication, proceed as follows:
  - i. Take a screenshot of the event, recording the date of occurrence
  - ii. Delete the message
  - iii. Following the password update, *and only then*, deliver a subsequent message via the same platform i.e. “Our account has recently been compromised. Do not click the recent DM link from us; we have taken steps to improve security and apologize for the inconvenience.”
5. Further guide to passwords and security on Twitter:  
<https://support.twitter.com/articles/76036-safety-keeping-your-account-secure#>



## **Privacy and Permitted Use (excerpted, DoIT IT Resource Use Policy)**

1. As indicated in the DoIT Information Technology Resource Use Policy, employees have no expectation of privacy in information stored on City computers or devices, or contained in any social media account created for or used for Agency purposes. Furthermore, there is no expectation of privacy when employee conduct concerns the Agency or its clients. See DoIT Privacy Policy in the *Resources Appendix* for more information.

*Ethics:* All of the laws, guidelines, and rules that apply to you as a City employee extend to your use of social media. These include, but are not limited to:

- Code of Ethics
- Conflict of Interest
- Open Meeting Laws
- Public Record Laws

*Disciplinary action:* Agencies may treat acts or omissions occurring in the context of social media in the same manner as any other employee act or omission. Failure to abide by policies established for use of social media may result in the loss of any social media privileges. As with any policy, violation may also result in disciplinary action.

## **Personal conduct of City of Boston employees via social media**

### **1. *Release of Information***

Official city information approved for release should be publicized first via official city accounts over social media, not via an employee's personal account. Employees may re-share a piece of content once it has originated from the official channel.

### **2. *Personal Accounts***

All users of social media should understand the public and transferrable nature of social media, regardless of security settings. Only manage constituent service conversations using officially established and approved City of Boston social media channels. Should an employee use their private account to manage constituent service, the account will be subject to all expectations of a City of Boston social media resource, including all terms of this document.

- i. Only with the express permission and involvement of a Department head/communications manager may an individual use a personal account in order to

comment on behalf of an organization. In doing so, the individual must identify their full name, official title and department in the conversation at that time.

- ii. If your personal profile identifies your professional affiliation, please add a disclaimer indicating that views, statements or opinions expressed via that account are not necessarily those of the City of Boston.

### **3. Political Activity**

- i. Subject to certain exceptions for elected officials and employees who hold policy-making positions, Massachusetts law generally prohibits City of Boston employees from using their public position to engage in political activity, whether election related or non-election related. Accordingly, City of Boston employees must carefully consider whether their use of City of Boston social media tools may be considered impermissible political activity. For example, City employees may not use a City's Facebook or Twitter account to post a link to a partisan political group or campaign website, request political contributions, or support the election of a candidate for political office.
- ii. **Hatch Act.** Additionally, some City employees who work in connection with programs financed in whole or in part by federal loans or grants are subject to additional restrictions on their political activities pursuant to the federal Hatch Act. City programs that typically receive federal funding include public welfare, housing, and transportation. The Hatch Act prohibits City employees subject to its provisions from, among other things:
  - a. using their official authority or influence for the purpose of interfering with or affecting the result of an election or nomination for office; or
  - b. directly or indirectly coercing or advising a City employee to contribute anything of value to a party, organization, or person for political purposes.
- iii. Although employees may use their *personal* social media accounts to advocate for or against political parties, partisan political groups, or candidates for partisan public office while off-duty and away from the workplace, they may not refer to their official titles or positions with the government while engaged in such efforts.
- iv. For example, an employee does not violate the Hatch Act if they identify their official position in the "Work" section of their personal Facebook page or write a post that states, "I am voting for candidate X," and does so outside the bounds of their professional capacity.
- v. However, an employee violates the Act if he or she posts via personal page stating, "As an employee for the City, I know that candidate X is the best candidate." Additionally, a supervisor is in violation of the Act if they write on a subordinate's

personal Facebook wall that contributions should be made to a particular political candidate.

- vi. Due to the intricate nature of rules around prohibited political activities, if you have questions, please contact the City’s Law Department at 5-4936.

## **Public Records Retention**

As a general rule City of Boston social media accounts are subject to the Massachusetts Public Records Law (Chapter 7, Section 4, Clause 26). Any content maintained in a social media format that is related to City business, or that is developed or used for approved business purposes, including a list of subscribers and posted communication, is a public record.

### **Public Access**

The Agency maintaining the account is responsible for responding completely and accurately to any public records request through social media. Content shall be maintained in an accessible format enabling its production in response to a request. Whenever possible, such accounts shall clearly indicate that content posted or submitted for posting is subject to public disclosure. Users shall be notified that public disclosure requests must be directed to the relevant Agency public disclosure officer.

### **Records Retention**

Chapter 66 of the General Laws and Chapter 68 of the Acts of 1988 govern the management and retention of the City’s official records. To comply with these laws, the City’s records management policies and records retention schedule provide requirements and guidelines for managing the life cycle of all City records regardless of medium.

To implement the policies and retention schedule, individual Agencies are responsible for developing procedural plans (“file plans”) for the systematic disposition of Agency records in accordance with the retention schedule. The laws, policies and retention schedule apply to social media formats and content as they do to other format and content. Any City Agency maintaining a social media account shall preserve records for that account for the required retention period on a City server in a format that preserves the integrity of the original record and is easily accessible.

After identifying social media content as official records, the Agency must apply a retention period based on its Agency file plan or City or State retention schedules, or work with the Archives and Records Management Division to formulate an appropriate retention period. The following records series on the Citywide Record Retention and Disposal Schedule may commonly apply to items posted on social media:

ADM-04      Publications – Department Produced or Sponsored

ADM-05      Public Relations Files -Historically Significant

ADM-09	Correspondence/Subject Files - Historically Significant
ADM-10	Correspondence/Subject Files – Program Administration
ADM-11	Transitory Correspondence
ADM-28	Recordings, Audio and Visual - Other Recordings

If social media records are not adequately covered by these or other records series in the retention schedule, the Agency should work with the Archives and Records Management Division to determine an appropriate retention period.

### Questions and Concerns

For any questions regarding Record Retention for Social Media, including what constitutes a public record or what is an appropriate record retention period, you may contact the following individuals:

- **Patrick T. Collins**  
*Document & Records Management Analyst*  
 Department of Innovation & Technology  
**Phone:** (617)-635-4292  
**Email:** [Patrick.Collins@boston.gov](mailto:Patrick.Collins@boston.gov)
  
- **John McColgan**  
*Deputy Archivist*  
 Archives and Records Management Division  
**Phone:** (617)-635-1195  
**Email:** [John.McColgan@boston.gov](mailto:John.McColgan@boston.gov)

### C. Policy and compliance

CSTS will monitor accounts and work in concert with social liaison team toward the goal of creating a dynamic and mutually rewarding digital engagement between City departments and constituents. In the unfortunate event that an account is

- a) created without consultation
- b) Operates outside the terms of this document in a way that cannot be reconciled with CSTS

The CSTS will retain the right to assume operation until a suitable working process is reestablished.

## **Additional Contacts**

Lindsay Crudele  
Community and Social Technology Strategist  
5-2249; [Lindsay.crudele@boston.gov](mailto:Lindsay.crudele@boston.gov)

City of Boston Web Team:  
5-1999; [WEBteam@boston.gov](mailto:WEBteam@boston.gov)

Jose Gonzalez, Legal Department  
5-4936; [Jose.Gonzalez@boston.gov](mailto:Jose.Gonzalez@boston.gov)

## **Appendices**

Appendix A. Receipt and Acceptance of Social Media Policy  
Appendix B. Creative Brief for New Projects and Accounts  
Appendix C. New Asset Creation Release Form