

	Policy:	Social Media Policy
	No.:	COM-03
	Effective Date:	26 August 2025
	By-Law No.:	2025-1988
	Review Date:	(4 years from effective date)

1.0 POLICY STATEMENT

It is the policy of the Township of Lanark Highlands to support the use of social media and other forms of digital communication as part of its overall communications strategy. The Township recognizes that effective service delivery includes providing information to the public in a fair, timely, respectful, and transparent manner.

This policy establishes the framework for the use of social media by the Township, ensuring that corporate accounts are used consistently, professionally, and in alignment with applicable legislation and Township standards.

The Township's official website (www.lanarkhighlands.ca) remains the primary and authoritative source of municipal information. Corporate social media accounts are intended to complement the Township's web presence and provide additional avenues for public engagement and communication.

2.0 SCOPE

This policy applies to Townships employees, Committee members, volunteers and Council members who make public statements on Township social media sites and other social networks that discuss, share, or comment on the Township. This policy also applies to members of the public who use, comment, or post on Township social media sites and social networks.

The policy applies to all social media accounts used by the Township of Lanark Highlands.

3.0 DEFINITIONS

In this policy:

CAO shall mean the Chief Administrative Officer.

Employee shall mean an employee of The Corporation of the Township of Lanark Highlands.

Digital Communication shall mean information that is shared using the Internet or mobile communication network for any purpose (i.e.: information sharing, marketing, public engagement, etc.).

Public Record shall mean anything which is created in the regular course of conducting Township business and which documents the business of the Township, regardless of format. Public records documents decisions, policies, procedures, transactions, activities, commitments, obligations, ownership, entitlement, legal rights, etc. of the Township and are

relied upon by the Township as proof of such to support Township business.

Public Statement shall mean a declaration made by a Township employee, official, or representative in any public forum, which relates to the Township, its employees, and/or its business. This includes statements made on personal social media accounts which the public can view, public online forums or discussions, social networking pages, and elsewhere in the public record.

Social Media shall mean any digital communication channel, application, or service that enables users to create, share, and interact with content or with one another in a virtual community or network. This includes, but is not limited to, platforms for publishing text, images, video, audio, or interactive media; facilitating online conversations; or providing avenues for public feedback and engagement.

Social Media Content shall mean content that is planned and developed by the Township's departments and posted or intended to be posted on the Township's social media. This refers to any posts, notices/media releases, documents, photographs/graphics, videos, links, or other information that is created, posted, distributed, or transmitted via social media.

Social Media Moderators shall mean Town staff who are designated to post, update, monitor, and review content on corporate social media, and who are also responsible for social media governance, strategy and implementation, and who work directly with all municipal departments and stakeholders to lead social media initiatives.

Township shall mean The Corporation of the Township of Lanark Highlands.

4.0 ROLES AND RESPONSIBILITIES

Council Members, Employees, Committee Members and Volunteers

4.1 It is the responsibility of all Council members, employees, Committee members and volunteers to ensure compliance with this policy. Issues concerning potential noncompliance with this policy will be brought to the attention of the Chief Administrative Officer to ensure compliance with this policy.

Members of Council

4.2 Members of Council are responsible for adhering to the provisions set out in Sections 5.13-5.16 of this Policy when using social media.

Social Media Moderators

4.3 Social Media Moderators designated to write, post, and respond on official Township social media accounts shall act as public representatives of both their department and the Township as a whole. In fulfilling this role, Moderators shall adhere to professional standards, follow best practices for online communication, and exercise sound judgment in all interactions. Moderators must at all times recognize that they are representing the Township of Lanark Highlands when engaging on official social media platforms.

5.0 SPECIFIC DIRECTIVES

Public Engagement on Township Social Media

- 5.1 The Township shall use social media as a communication tool to enhance public awareness and understanding of Township programs, services, and initiatives.
- 5.2 Members of the public are invited to engage with Township social media content and are expected to treat fellow users, Township staff, Council, and the municipality itself with respect in all interactions.
- 5.3 The Township recognizes that members of the public may express concerns, opinions, or perspectives that do not align with municipal decisions. Constructive and respectful dialogue is encouraged; however, inappropriate content, as defined in this Policy, will not be tolerated and may be subject to removal.
- 5.4 All official Township social media accounts shall include a visible disclaimer, where platform functionality allows, that outlines expectations for respectful engagement and notifies users that third-party comments do not represent official communications of the Township. The disclaimer shall also direct users to the Township's official website as the primary source of authoritative municipal information.

Administration of Township Social Media Accounts

- 5.5 Only designated Social Media Moderators are authorized to post content on official Township of Lanark Highlands social media accounts.
- 5.6 Social Media Moderators shall provide centralized oversight and regular monitoring of official Township social media accounts. Monitoring shall occur during regular business hours (Monday to Friday, 8:30 a.m. to 4:30 p.m., excluding statutory holidays), to ensure content accuracy, appropriate public engagement, and compliance with this Policy.
- 5.7 Social Media Moderators shall make every reasonable effort to respond to constructive questions and concerns posted on official Township social media accounts. Where a response is warranted, the goal shall be to provide a reply within two (2) business days; response times may vary depending on staff availability and the complexity of the inquiry.
- 5.8 Login credentials and passwords for Township social media accounts shall be treated as confidential information and shall be securely stored and managed by the designated Social Media Moderators.

Standards of Conduct on Social Media for Township Representatives

- 5.9 Employees and Members of Council who choose to promote or share Township events, programs, services, or initiatives on personal social media accounts shall do so by sharing original content posted on official Township social media accounts, in order to support accuracy, consistency, and compliance with public records requirements.
- 5.10 Employees, volunteers, committee members, and Members of Council act as representatives of the Township when engaging in any online content related to the Township, its operations, services, policies, or procedures. In doing so, they shall adhere

to Township branding and conduct standards, and must comply with all applicable Codes of Conduct. This requirement applies both when engaging on official Township social media pages and when participating in online discussions involving Township matters on other public platforms.

Employee Use of Personal Social Media

5.11 Employees may engage in personal use of social media as private citizens. However, such activity shall not interfere with their performance of duties, impair workplace relationships, or negatively affect the reputation or public perception of the Township. Employees shall refrain from any speech or conduct on social media that may cause deliberate harm or disruption to the Township's operations or mission.

5.12 Employees who identify themselves as Township employees on personal social media accounts shall not post confidential or sensitive information about the Township. Employees who are unsure whether certain information is confidential must seek guidance from their supervisor, the Social Media Moderator, or the CAO before posting.

Reeve and Council Use of Social Media

5.13 The Reeve and Members of Council shall use social media in a manner that is consistent with their roles and responsibilities under the Municipal Act, 2001, and the Township's Code of Conduct. In all online activity related to Township matters, Members of Council shall:

- a) Represent the public and consider the well-being and interests of the Township;
- b) Ensure accountability and transparency in Township operations.

5.14 When responding to public comments regarding Township matters on social media or other online platforms, Members of Council shall clearly identify themselves as Members of Township Council.

5.15 If social media content or online discussions result in media inquiries or raise potential legal questions, Members of Council shall promptly bring such matters to the attention of the CAO for appropriate handling.

Sharing and Re-Posting Content

5.16 When sharing or re-posting content that is not owned by the Township, content that includes external links can be shared or re-posted if:

- a) It connects the public with information and services provided by upper-tier governments or government-funded agencies or boards;
- b) It provides further information on a subject matter. Such information must be provided by an official and/or accredited source; or,
- c) It is from a Township-affiliated organization, a service club, or a registered charity; or
- d) Content promoting events can be shared or re-posted if the event:
- e) Occurs within the boundaries of the Township and/or Lanark County
- f) Is open to the public
- g) Has one of more of the following attributes:
- h) Funded in full, in part, or sponsored by the Township;
- i) Organized by a Township advisory committee;
- j) Organized or funded by another level of government;
- k) Organized by a government-funded agency or board;

- l) Organized by a registered charity operating within the Township;
- m) Organized by a service club operating within the Township; or,
- n) Not a commercial or for-profit business.

Prohibited Content and Moderation

5.17 The Township, at its sole discretion, reserves the right to monitor, remove, or disable comments or content on its social media platforms that includes, but is not limited to, the following:

- a) Profane, obscene, explicit, sexual, or pornographic language, images, or content, including sarcastic, disrespectful, or aggressive comments.
- b) Personal attacks, harassment, or bullying directed toward individuals or groups, including Council members, staff, members of the public, or organizations.
- c) Discriminatory content that promotes, fosters, or perpetuates discrimination based on any ground protected under the Ontario Human Rights Code.
- d) False, unsupported, defamatory, or misleading statements, including impersonation or misrepresentation of individuals, organizations, or Township officials.
- e) Commercial solicitations, advertising, or promotion of businesses or services not affiliated with or endorsed by the Township.
- f) Political promotion or opposition, including support for or opposition to any candidate or political party in a municipal, provincial, or federal election.
- g) Content that promotes or encourages illegal activity or could compromise public safety, security, or Township operations.
- h) Content that violates privacy, including personal information protected under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), or images or information about identifiable individuals without prior written consent.
- i) Spam, repetitive, off-topic, or automated content, including posts from anonymous, robot, or bot accounts and unsolicited external links.
- j) Content that infringes on copyright or intellectual property rights, or otherwise violates municipal policies, including Human Resources, Health & Safety, or other applicable policies.

Comment Management:

5.18 The Township, at its sole discretion, reserves the right to limit or disable public commenting, either temporarily or permanently, on any social media platform or post, where necessary to maintain a respectful environment, prevent abuse, or protect the integrity of communications.

5.19 When a comment or content is removed from an official Township social media account, the Social Media Moderator shall document the action by retaining a record of the removed content (such as a screenshot), along with the rationale for its removal, in accordance with Township record-keeping practices.

5.20 If a member of the public believes a submission on any Township social media account violates the Township's Social Media Policy, they shall report it to the Social Media Moderator(s). Any content that is deemed inappropriate will immediately be dealt with and, if an issue arises, will be brought to the attention of the CAO who will review the scenario and determine a course of action.

Social Media Disclaimer

5.21 All official Township social media accounts shall include a visible disclaimer, where platform functionality allows, stating that third-party comments and content do not represent official communications of the Township of Lanark Highlands. The disclaimer shall also direct users to the Township's official website as the primary and authoritative source of municipal information.

Records Management and Freedom of Information Compliance

5.22 Social media content created, posted, or shared by the Township may constitute a municipal record under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), depending on its nature and context.

5.23 The Clerk, in consultation with Social Media Moderators and relevant staff, shall ensure that social media content determined to be a municipal record is appropriately captured, stored, and retained in accordance with the Township's Records Retention By-law and records management practices.

5.24 Content subject to MFIPPA may include, but is not limited to: official announcements; posts communicating municipal decisions, programs, or services; public feedback that informs decision-making; and public correspondence directed to the Township through its official social media platforms.

5.25 Where feasible, the Township shall use appropriate tools and methods (such as screenshots, archiving, or platform-based retention) to capture relevant social media records in a format that supports access, searchability, and retrieval in response to freedom of information requests.