

## **EAST BERLIN BOROUGH GENERAL COMMUNICATION POLICY**

**General Principle:** The Borough of East Berlin, Pennsylvania supports open and responsive local government. Integrity, transparency and accountability are our guiding principles. This policy will be posted and stored in a Communication Policies Notebook at the Borough Hall office and on the Borough website.

To ensure a consistent, positive approach, the following general communication policy is effective as of September 4, 2019, unanimously approved by East Berlin Borough Council.

- A. East Berlin Borough officials and employees will strive to maintain a civil and respectful work atmosphere at all times.
- B. Courtesy, respect, and honesty will guide the Borough's communications with each other, residents, local businesses, local organizations and the general public.
- C. The Borough Council must ensure that all officials and all employees are aware of their responsibility to develop and maintain good communication practices. These practices must be conducted free of discrimination, harassment and bullying, and be respectful of confidentiality and privacy. The Borough Council will monitor and improve these communication practices on a regular basis.
- D. Official communications by Borough officials and employees must comply with Federal and State laws and regulations, with special focus on the Pennsylvania Sunshine Act, and in accordance with Borough policies.
- E. The Borough sign, website, social media accounts, email accounts, and any means used for official communication must not be used by Borough officials or employees for personal or political purposes.
- F. Borough officials and employees must not include in personal conversations, email communication, or posts on the Borough website or social media sites any information that has been classified as confidential.
- G. The Borough Council must ensure that all officials and all employees are aware that all official forms of communication (including written correspondence, email, text, social media post, and website content) are considered public record and may be disclosed under Pennsylvania's Right-to-Know Law.
- H. When Borough employees communicate (by phone, email and/or in person) with members of the public about issues that are or will be before the Borough Council, the employee will record in a Communication Log the following: date, name and contact information, and message details. This Communication Log will be made available to all Borough Council members and archived for future reference.
- I. The Borough Secretary and/or a trained designee (staff, volunteer or contractor) will be the administrator(s) of the Borough website, the primary electronic means of communication with the public. Website content and practices must be based on

guidelines established by the Borough Council to ensure neutrality, accuracy and relevance. Borough Council members may serve in advisory roles, but no elected official may serve as the website administrator.

- J. Official Borough documents must be converted into PDF's ("portable document format" or equivalent format that cannot be edited or altered) before being attached to official emails or posted on the Borough website or social media sites. Draft working documents that are shared electronically between Borough officials, commission members, staff, and/or other governmental agencies may be in editable form, as necessary and appropriate.
- K. Borough employees will offer relevant, current and accurate information to the entire Borough Council on a regular basis to enable council members to be as effective and informed as possible in their various roles and responsibilities.
- L. The Borough will maintain a public relations program that may include: a municipal website and social media presence; newsletters; emergency alerts; annual reports; town hall meetings; and direct involvement of citizens or local groups in commissions, advisory committees, special programs, initiatives and/or events.
- M. The Borough Secretary/Treasurer will assist the Borough Council in managing the public relations program to promote the municipality and provide information to the public in a positive, accurate and timely manner. The Borough Council will review the program annually through various metrics to determine its effectiveness at reaching Borough residents.
- N. Technology that is necessary for effective internal and external communications must be updated in fiscally responsible ways on a regular basis.
- O. All communication with the Borough Solicitor, other than at a scheduled meeting or under the direction of Borough Council at a scheduled meeting, will be limited to only the Borough Council President, Vice President and/or Mayor.
- P. Policies that further define the Secretary/Treasurer's communications with the Borough Council, and who he or she reports to for direction, will be adopted and periodically reviewed by Borough Council and placed in the Borough's Personnel Manual.

## **EAST BERLIN BOROUGH EMAIL COMMUNICATION POLICY**

**General Principle:** The Borough of East Berlin, Pennsylvania encourages employees and public officials to use email communication in responsible, ethical and productive ways. This policy will be posted and stored in a Communication Policies Notebook at the Borough Hall office and on the Borough website.

To ensure a consistent, positive approach, the following policy is effective as of September 4, 2019, unanimously approved by East Berlin Borough Council.

- A. Borough Council members, Borough Secretary/Treasurer, Police Chief and head of Borough maintenance must without exception use Borough email accounts for municipal business. Other Borough officials/staff and/or commission/board chairpersons may use Borough email accounts for municipal business. All official emails must be archived for future reference.
- B. The Borough Council must ensure that Borough employees understand that they have no right to privacy with respect to their personal email accounts accessed by means of Borough equipment, or on Borough time. In addition, public records laws may bring this type of use under scrutiny by the media and the general public.
- C. If, for any reason, Borough officials or employees use private email accounts for municipal business, it is recommended that they be archived in a separate email folder in the event disclosure is requested or required.
- D. Everyone who contacts the Borough by direct email or through its website must receive an official response within two business days by the Borough Secretary/Treasurer or appropriate Borough official.
- E. Borough officials and employees must limit using email communication among themselves to simple housekeeping and administrative matters. When members do communicate among themselves within these tight boundaries, all members and, as appropriate, other borough officials and staff must be included in the communication to ensure transparency. However, private, serial discussions that can be construed as official deliberations, over email or via any medium, may violate Pennsylvania's Sunshine Act, especially if they involve a quorum of council members.
- F. Email communication sent to the Secretary/Treasurer's email inbox from other public agencies and local non-profit organizations that are intended for the Borough Council will be forwarded to all Borough Council members. These include invitations, meeting minutes, reports, notices and other information that is considered essential and relevant as determined and periodically reviewed by the Borough Council.

## EAST BERLIN BOROUGH SOCIAL MEDIA POLICY

**General Principle:** The Borough of East Berlin, Pennsylvania encourages employees and public officials to consider how web-based social media sites can play a role in enhancing communication, collaboration and information exchange with residents of East Berlin Borough. This policy will be posted and stored in a Communication Notebook at the Borough Hall office and on the Borough website.

To ensure a consistent, positive approach, the following policy is effective as of September 4, 2019, unanimously approved by East Berlin Borough Council.

- A. The Borough Council must ensure that Borough employees understand that they have no right to privacy with respect to their personal social media accounts accessed by means of Borough equipment, or on Borough time. In addition, public records laws may bring this type of use under scrutiny by the media and the general public.
- B. Whether or not a public profile on personal social media accounts indicates that the account owner is a member of the Borough Council or works for the Borough, the audience may think that content represents Borough Council decisions and/or policies. It is important to understand that even if great care is taken, personal social media accounts still may be considered official extensions of the Borough, thus turning all posts, comments, and private messages, including deleted ones, into public record and subject to disclosure under Pennsylvania's Right to Know Law.
- C. The Borough Council must approve use of any social media site by the Borough. Every social media site used by the Borough must be linked to the Borough website. As necessary, disclaimer(s) must be posted on the Borough website that distinguish official social media accounts of the Borough from those that may mimic an official account in name or content.
- D. Posts on Borough social media sites must be informational in nature, including the following: legal notices; Borough Council, Planning Commission, Parks and Recreation Commission and Zoning Hearing Board schedule; Commission/Zoning Hearing Board vacancies; trash/recycling notices; emergency notices, resolutions, ordinances and other public documents that are proposed or have been adopted, in accordance with the Pennsylvania Sunshine Act and other relevant statutes, community-wide events; and other official information deemed important by the Borough Council for the public to know.
- E. The Borough Secretary and/or a trained designee (staff, volunteer or contractor) must be the administrator(s) and (moderator(s) of the Borough's social media sites. Borough council members may serve in advisory roles, but no elected official may serve as the official administrator or moderator.
- F. Borough employee(s) who represent the Borough in an online role (on the Borough website and/or social media sites) must conduct themselves in the utmost professional manner in accordance with the borough's General Communication Policy and relevant policies in the Borough's Personnel Handbook. The social media site moderator(s) must

exhibit neutrality and strict adherence to the Borough's social media policy and guidelines/rules established by the Borough Council. The Borough Council must ensure that the moderator(s) is/are trained to distinguish between a prohibited category of speech and a protected viewpoint.

- G. Since the Borough considers their accounts on social media sites to be "Limited Public Forums," the Borough will moderate public discussions and reserves the right to delete unacceptable submissions. Categories of prohibited speech that are subject to deletion must be prominently posted on the Borough's website and social media accounts. Any content that is removed based on these policies may be archived with date, time and identity of the Borough employee/official who removed content and person that made the post/comment/message. This practice protects the Borough in the event of a complaint or legal challenge.
- H. The following must be posted on all social media sites used by the Borough of East Berlin. The list of prohibited speech applies to Borough administrator(s) who post on social media sites and members of the public who post comments:

*While the East Berlin Borough official website is and will remain the primary electronic means of communication with the public, the Borough may use social media sites to provide information and to interact with residents, businesses and visitors about municipal issues. The Borough considers these moderated discussion sites to be "Limited Public Forums". Comments must relate to the purpose or topic established by the Borough. Social media sites are public, and therefore hold both benefits and risks. All content, including posts and comments, may be subject to Pennsylvania's Right-to-Know Law. The Borough reserves the right to delete unacceptable submissions. Deleted content and comments may be archived. The following list of examples of unacceptable content and comments is not intended to be all-inclusive:*

- *Vulgar or obscene language;*
- *Sexually explicit or violent language, images, cartoons, jokes, messages or other like material;*
- *Threats, profanity, personal attacks or insults, or material that could be considered to be harassing, defamatory, fraudulent, abusive, offensive or discriminatory;*
- *Comments or content that contains hate speech or constitutes, promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, genetics, status with regard to public assistance, national origin, physical or intellectual disability, sexual orientation, or any other classification protected by applicable federal, state, or local law or regulation;*
- *Any comment that advocates illegal activity;*
- *Promotion of particular services, commercial transactions, products, or political organization;*
- *Opposition or promotion of any person campaigning for election to a political office;*
- *Non-public information concerning securities or that constitutes insider-trading or forwarding looking statements;*
- *Infringement on copyrights, trademarks, trade secrets, licenses, or any other intellectual property;*
- *Personally identifiable or protected medical or personal information;*

- *Information that may compromise the safety, security or proceedings of public systems or any criminal or civil investigations.*

*DISCLAIMER: Please note that monitoring will not occur 24/7/365. Therefore, East Berlin is not liable for inappropriate or offensive comments that may be posted during a non-Borough monitored time frame. Neither the Borough of East Berlin government nor any Borough officer, official, or employee of the Borough warrants the accuracy, reliability or timeliness of any information published by this system, nor endorses any content, viewpoints, products, or services linked from this system, and shall not be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of such information. Please note that public comments and/or content expressed on this site do not reflect the opinions and/or positions of the Borough of East Berlin government, its officers, officials or employees. If you have questions concerning the operation of this online, moderated discussion site, please contact the Borough at (717) 259-9224.*