

THE CORPORATION OF THE MUNICIPALITY OF STRATHROY-CARADOC

BYLAW NO. 23-18

**A BYLAW TO ESTABLISH A MUNICIPAL COMMUNICATIONS POLICY FOR
THE MUNICIPALITY OF STRATHROY-CARADOC**

WHEREAS the Council of The Corporation of the Municipality of Strathroy-Caradoc deems it expedient to establish a Municipal Communications Policy;

**NOW THEREFORE BE IT ENACTED BY THE COUNCIL OF THE
CORPORATION OF THE MUNICIPALITY OF STRATHROY-CARADOC AS
FOLLOWS:**

1. **THAT:** the “Municipal Communications Policy” attached to and forming part of this bylaw be approved;
2. **THAT:** this bylaw shall come into force and effect on the date of its final passage in Open Council.
3. **THAT:** Bylaw 25-12 being a bylaw to adopt a Corporate Website and Social Media Policy, is hereby rescinded.

**Read a FIRST, SECOND AND THIRD TIME AND FINALLY PASSED IN OPEN
COUNCIL this 19th day of March, 2018.**

Mayor

Clerk



Municipal Communications Policy

1.0 INTRODUCTION AND BACKGROUND

Cohesive and effective communications is an active process that, when done correctly, permeates every branch and department of an organization. It is essential to the effective administration of public policy, to the promotion of sustainable economic development, and it is integral to overall professionalism and staff and resource management.

Effective Communications is a term that denotes measured and thoughtful written and verbal transmissions and interaction with media, the public and with stakeholders in business, the social sector and internally to the Corporation. It also includes a monitoring and fulsome analysis of information received as a consequence of any public and/or feedback process. In effect, effective communications is an active and deliberate two-way process.

Direction needs to be provided to all officials of the Municipality regarding the basic requirements of corporate identity management within the municipality and standards set for municipal messaging at every level.

2.0 DEFINITIONS

Brand Identity: indicates how the municipality wants its inhabitants to perceive its brand.

Brand Management: the process of maintaining, improving and upholding a brand so that the name is associated with positive results. Besides corporate identity, brand management involves a number of important aspects such as customer relations and satisfaction, business processes, staff motivation and communication. Brand management is built on a marketing foundation, and focuses directly on the brand and how that brand can remain favourable to customers/stakeholders.

Communications Designate of the CAO: the Chief Administrative Officer or an individual or Committee designated by the CAO to exercise a specific function denoted within this policy.

Confidential Material Information: any material information not widely disseminated within or external to the Corporation which, if disclosed, would be unduly detrimental to the Corporate interests. For example, immediate disclosure might interfere with the Corporation's pursuit of a specific objective or strategy, with ongoing negotiations, or with its ability to complete a transaction.

Corporation: the Municipality of Strathroy-Caradoc, its Committees, Departments and/or any other branch or division falling under the operational or legislative control of the Municipality of Strathroy-Caradoc.

Corporate Identity: the means by which the municipality is recognized. It is also a means of conveying the ways in which it carries out, and values inherent in, its activities.

Disclosure Committee: a committee of Corporate personnel with a primary function to assist the Chief Administrative Officer (CAO) in fulfilling his/her oversight responsibilities with respect to certification of disclosure controls and procedures required under law. The Committee serves as an independent and objective party to help develop and monitor the Corporation's disclosure system.

Employee: Refers to any person, including a volunteer, who is acting or seen to be acting in an official capacity on behalf of the Municipality.

General and Routine Information: information that would not otherwise be classified as material information, and which is not otherwise required to be kept confidential because of privacy laws.

Image: the impression clients or consumers have of the municipality's total personality (real and imaginary qualities and shortcomings).

Material Change: a change in the business, operations, or capital of the Corporation that would reasonably be expected to have a significant effect on the financial or operational plans or situation of the Corporation, and includes a decision to implement such a change made by the CAO, or an authorized member of Senior Management.

Material Information/Fact: any information relating to the business and affairs of the Corporation that when publicly released would significantly affect, or would reasonably be expected to have a significant effect on the Corporation.

Municipality: the Municipality of Strathroy-Caradoc, its Committees, Departments and/or any other branch or division falling under the operational or legislative control of the Municipality of Strathroy-Caradoc.

Municipal Personnel: any agent or person employed by the Corporation, as well as the Council, appointees of Council, volunteers acting for the Corporation; contractors, agents and representatives when acting as such.

Museum: the Museum Strathroy-Caradoc (colloquially known as the Strathroy-Caradoc Museum) is a division of the Municipality tasked with the preservation and showcasing of local heritage.

Secured: placement and/or storage of an item, package, information or material in a location that is accessible only to a person authorized to access it.

Selective Disclosure: disclosure of confidential material information to one or more individuals or companies and not broadly to the investing public.

Senior Officer/Senior Management: includes the CAO and all Directors of the Corporation.

Website: Refers to the Municipal website and all subsites and/or websites maintained by and/or funded via Municipal resources unless otherwise specified in this policy or within an applicable regulation or statute enacted by another government with jurisdiction.

3.0 PURPOSE

- To provide clear rules, guidelines and structures for the deployment, management and oversight of all internal and external communications undertaken or authorized by the Municipality, including the release of information about the Municipality to the general public, media, customers, potential investors, and to other stakeholders;
- To establish messaging that underscores and promotes the corporate identity;
- To maintain continuity and consistency in all expression and applications of the corporate identity; and
- To compliment the Municipal Branding Policy and other authorized communications and marketing initiatives advanced by the Municipality of Strathroy-Caradoc.

4.0 SCOPE

This policy applies to all Strathroy-Caradoc employees, volunteers, agents and to the whole Council with respect to all information (general, confidential, or material) in whatever form or means, regarding the Corporation that is shared between the Corporation and Corporate personnel, and other parties.

For clarity, the Chief Administrative Officer (CAO) shall be primarily responsible for the general maintenance, advancement and stewardship of this policy and, to assist with this, the CAO may strike a staff Communications Advisory Committee comprised of municipal personnel representing key departments of the Corporation. The CAO, or a designate, will Chair such a Committee and that Committee will deliberate and make recommendations to the CAO with respect to the administration of this policy.

In cases of conflict or confusion, the Chief Administrative Officer (CAO) of the Municipality of Strathroy-Caradoc shall be empowered to make any and all necessary alterations or clarifications needed to ensure the equitable and effective application of this policy.

During times of the CAO's absence, the Director of Corporate Services, will be authorized to undertake all duties of the CAO with respect to corporate communications.

5.0 GENERAL

The custodian of Corporate messaging is the CAO and Council. In this capacity, the CAO shall, with the input and guidance of the Council:

- Establish key messaging for the Municipality (see Appendix 1);
- Ensure key messaging supports the brand identity established by Council;
- Ensure consistency and coherence in communications objectives and methodologies;
- Manage the resources necessary for effective communications;

- Oversee and manage the Municipality's social media and web presence;
- Oversee and manage the Municipality's communications output; and
- Oversee and manage communications linkages and key priorities across the Corporation.

For clarity, the above includes all Municipal communications (print, audio, electronic, verbal etc.) of the Corporation; whether internal or external.

6.0 OBJECTIVES

The Corporation has both a legal and moral obligation to ensure that all information relevant to the business and affairs of the Corporation is, if and when applicable, disclosed in an appropriate, fulsome and honest manner. This policy will assist the Corporation in satisfying the objectives above, and in assigning responsibility for the implementation and oversight of these policies and procedures. For clarity, the primary objectives of this policy are:

- To ensure material information is disclosed in a timely, consistent, and appropriate manner;
- To provide clear guidelines for the broad dissemination of material information pursuant to all applicable legal requirements and best practices;
- To prevent the improper use or premature disclosure of confidential material information under the care and control of the Corporation;
- To ensure that information is managed and/or released in a manner that is open and transparent while simultaneously ensuring the stewardship and preservation of the corporate brand and image;
- To provide guidance for all municipal staff with respect to the proper protocols and practices as they relate to all communications including social and conventional media practices, marketing and brand management relating to the Corporation and to municipal business; and
- To provide direction for all municipal personnel in the appropriate treatment of material, confidential, general, and routine Corporate information.

7.0 DISCLOSURE OF INFORMATION

The Corporation is committed to timely, accurate, and complete disclosure of material information in an appropriate manner. The Municipality recognizes that it must meet the disclosure expectations of stakeholders and as prescribed by all relevant legislation and regulation. Every effort shall be made by Municipal staff and officials to ensure compliance occurs. Similarly, confidentiality and protection of sensitive information is a key priority for the Municipality. Unauthorized and/or inadvertent release or communication of information is unacceptable and should be prevented whenever possible.

This policy recognizes, within the aforementioned context, that the Municipality shall research, devise and execute a communications strategy with the objective of favourable outreach, promotion, information sharing and/or risk mitigation as deemed necessary.

Directors are responsible for ensuring that all requests received by their department, under any and all legislative access mechanism, are immediately communicated to the CAO and/or to the Communications Designate of the CAO in a timely manner.

7.1 DISCLOSURE COMMITTEE

A Disclosure Committee shall be established by the CAO. The Committee shall be tasked to recommend (to the CAO) and maintain (under the guidance and supervision of the CAO), a structure by which all formalized information of a personal nature shall be released. In effect, this staff Committee shall serve as the access to information branch of the Municipality. This Committee shall also undertake special tasks, as assigned by the CAO, relating to information disclosure. For example, should an unauthorized information disclosure occur, the Disclosure Committee could be mandated to investigate any breach and to report to the CAO for mitigation and/or corrective measures as are necessary.

7.2 COMMUNICATIONS COMMITTEE

The CAO may strike a staff Communications Advisory Committee comprised of municipal personnel representing key departments of the Corporation. The CAO, or a designate, will Chair such a Committee and that Committee will deliberate and make recommendations to the CAO with respect to the Municipal communications and, when appropriate, on the administration of this policy.

7.3 COMMUNICATIONS DESIGNATE OF THE CAO

The CAO may appoint Communications designate(s) to assist with the administration of this policy.

8.0 PREVENTION OF INFORMATION LOSS

To prevent the inadvertent loss or misappropriation of information under the care and control of the Municipality, the CAO shall be responsible for establishing and communicating control guidelines and directives for all staff. For example, all staff and volunteers should be aware of the following:

1. Documentation and supporting materials (paper and electronic) shall not be taken home unless first authorized by a Director or the CAO. For clarity, all Directors are authorized to take work home unless notified otherwise by the CAO;
2. All off-site documentation must be secured at all times;
3. Sensitive information received by virtue of employment with the Municipality is not for public disclosure unless appropriately authorized;
4. Keys, radios, documents, computer equipment etc. should never be left unattended in any unsecured location or automobile; and
5. Loss, damage or theft of any Municipal property or materials must be reported to a Director or to the CAO immediately.

8.1 CONFIDENTIALITY AGREEMENTS

Confidential material information under the care and control of the Municipality is subject to strict confidentiality restrictions and care must be taken to ensure the information is used only to further the approved business purposes of the Corporation.

Access to confidential material information is restricted to authorized persons who should be aware of their confidentiality obligations. To assist with this, the CAO may use confidentiality agreements where required to fortify this protection.

Wherever practical, confidential material information should:

- be identified as such;
- be stored in locked cabinets to which access is restricted;
- be removed promptly from meeting rooms at the conclusion of meetings;
- be subject to secure limited access of electronically stored computer information;
- *not* be discussed in places where the discussion may be overheard; and
- *not* be copied unnecessarily or discarded where others can easily retrieve it.

9.0 MEDIA RELATIONS, PUBLIC COMMENTS, AND DESIGNATED SPOKESPERSON

9.1 MEDIA RELATIONS POINT OF CONTACT

All media relations activities are coordinated by the CAO or a Communications Designate of the CAO.

Unless otherwise authorized by the CAO or a Communications Designate of the CAO, media-relations activities and media interviews are restricted to Members of Council, the CAO and/or a Communications Designate of the CAO.

In addition, whenever possible, the Mayor or a designated and/or appropriate member of Council shall be the primary spokesperson for the Municipality on non-technical and/or operational matters of governance. This includes matters such as:

1. Political matters;
2. Emergency situations (as designated by the Mayor); and
3. Community matters of a non-operational manner.

In specific circumstances, exceptions can be made by the CAO, the Mayor or the Council.

For example, from time-to-time, Senior Officers and/or other subject-matter experts may be called upon to speak to the media regarding specific areas of responsibility or subject matter. These opportunities will be pre-arranged in consultation with the CAO or the Communications Designate of the CAO.

Unless in conflict with the operational or business requirements of the Corporation, media deadlines are to be respected wherever possible. Municipal personnel who are not authorized to serve as spokespersons will not respond on behalf of the Municipality to any enquiry from, or initiate communication with, the media. All media enquiries must be referred to the CAO or the Communications Designate of the CAO as soon as possible for follow up by an appropriate and designated spokesperson.

9.2 ROLES AND RESPONSIBILITIES OF THE DESIGNATED SPOKESPERSON

The designated spokesperson has a duty to speak truthfully and openly to the best of his/her knowledge regarding the Municipality, subject to the disclosure restrictions as discussed in the previous sections.

9.3 PUBLIC COMMENTS AT MEETINGS/CONFERENCES

Municipal personnel who are invited to make speeches or presentations at community/industry/stakeholder groups, conferences, or public meetings, as a part of their normal area of responsibility, should receive the approval of their supervisor prior to accepting such invitations. Should such an opportunity be pursued, the roles and responsibilities of the designated spokesperson stipulated above will apply.

9.4 PUBLIC STATEMENTS OF PERSONAL OPINION

Municipal personnel should refrain from making public statements of personal opinion regarding the Municipality or municipal business and from presenting a personal opinion regarding the Municipality as a fact.

9.5 DUTY OF LOYALTY

Common law imposes, on all employees, the fiduciary duties of confidentiality and loyalty to one's employer, prohibiting them from disclosing or using their employer's confidential material information to the employer's detriment. In the broadest sense, the Corporation extends this responsibility to each and every person employed by the Corporation, and requires all employees to act with good faith, honesty, and loyalty.

10.0 RELEASE OF INFORMATION

10.1 PRINCIPLES OF MATERIAL INFORMATION DISCLOSURE

When releasing material information, the Corporation will adhere to the following:

- Where a determination has been made to disclose material information, such information will immediately be broadly disclosed to the public;
- Disclosure must include any information the omission of which would make the rest of the disclosure misleading (half-truths can be misleading);

- Unfavourable information must be disclosed as promptly and completely as favourable information;
- Disclosure on the Corporate website does not by itself constitute adequate disclosure of material information;
- No selective disclosure will be permitted for media purposes. Confidential material information must not be disclosed to selected individuals unless specifically directed by the CAO; and
- Disclosure must be corrected if the Corporation subsequently learns that earlier disclosure by the Corporation contained an error at the time it was given.

10.2 UNINTENDED SELECTIVE DISCLOSURE

If confidential material information has been inadvertently disclosed to any person not bound by a confidentiality obligation, legal intervention or counsel must be secured immediately to remedy the situation. Upon becoming aware of an unintentional selective disclosure, Municipal personnel are required to advise the CAO of the circumstances immediately.

10.3 NEWS RELEASE

News releases containing material information will be issued as soon as practicable via a protocol approved by the CAO. In addition, the news release will be transmitted to major and local media (as appropriate), as well as being posted on the Corporate website and social media platforms.

Corporate Services, via a Communications Co-ordinator, is responsible for the appropriate dissemination of information once approved for release by the CAO or a Communications Designate of the CAO.

10.4 ROUTINE INFORMATION REQUESTS

Enquiries from the public for general and routine information can be answered by the appropriate employee/Manager/Director if the information requested is contained within records/publications previously released for public distribution and if the information falls under the operational control of the said employee/Manager/Director. If an employee/Manager/Director is unsure if they should release any information, clarity must be sought from a supervisor prior to any information release.

Enquiries from the public cannot be answered if the enquiry is regarding Corporate activities that constitute confidential material information. If such an enquiry is made, the employee/Manager/Director will respectfully decline the request as containing confidential or proprietary information.

10.5 RESPONDING TO RUMOURS OR GENERAL SOCIAL MEDIA POSTS

In general, no comment will be made in response to rumours or speculation regarding the Corporation. However; certain exceptions may be made under the

direction of the CAO or a Communications Designate of the CAO (for example, if the safety or security of the public is subject to speculation). If such an exception is authorized, section 11.0 of this policy will apply. Also see Appendix II for additional clarification.

11.0 ELECTRONIC COMMUNICATIONS AND THE CORPORATE WEBSITE

All communications, including electronic communications, must comply with the relevant laws and with this policy. This includes email, the internet, social media, an intranet, and the internal network of the Municipality. Proper precautions should be taken when using electronic communications to discuss confidential material information. Additional clarity as it relates to the Municipal website and social media can be found in Appendix II.

A Communications Co-ordinator is responsible, under the direction of the CAO and/or the Communications Designate of the CAO for monitoring and updating information on the Corporate website and social media platforms. As of April 1st, 2018, postings on the Corporate website and social media platforms will (whenever appropriate and possible) adhere to the following principles:

- Postings will incorporate one or more of the municipality's established and approved key messages relating to brand identity (see Appendix I);
- Additions to the website, specifically press releases and pdfs, will include the date they were posted;
- Information posted on the website will be kept current;
- The website, and documents posted to it, will be AODA-compliant whenever possible; and
- Links from the Corporate website to external third-party websites will be worded in such a way as to make it clear to users that they are leaving the Municipal website. As well, all links to external sites will open those sites in a new browser window or tab to emphasize the fact that users are leaving the Municipal site.

11.1 INTERNET DISCUSSION FORUMS, CHAT ROOMS, BULLETIN BOARDS AND ELECTRONIC MAIL (EMAIL)

Due to the immediacy of electronic information, Municipal personnel are discouraged from participating in discussions about the Corporation on internet discussion forums, chat rooms, or bulletin boards. Municipal personnel may not, at any time, discuss confidential material information. Posting on official Municipal social media forums by unauthorized municipal personnel is restricted. Also see Appendix II for additional clarification.

11.2 QUIET PERIODS OR BLACKOUTS

From time-to-time, communications blackouts may be prescribed by the CAO.

12.0 REPORTING OF SIGNIFICANT EVENTS

The CAO must be immediately informed of all relevant deaths, emergency situations and especially unusual incidents involving the Municipality. The CAO must be immediately informed of all legal actions involving the Corporation.

13.0 DATA AND RECORD KEEPING

Where practicable, spokespersons will keep notes of telephone conversations with stakeholders and members of the public. Spokespersons should consult the CAO or the Communications Designate of the CAO if questions arise concerning communications practice, policy or the release of information.

14.0 GOVERNING RULES AND REGULATIONS

This policy needs to be read in conjunction with other requirements that govern the release and retention of information.

The Municipality of Strathroy-Caradoc accepts the doctrine of federal/provincial paramountcy as it relates to all municipal policies, procedures and by-laws. For clarity, this acceptance means that, where there is an inconsistency or overlap between any validly enacted municipal policy, procedure or by-law and a lawful and relevant federal or provincial directive, statute or regulation, the federal or provincial directive, statute or regulation shall take precedence and override the cited municipal provision to the extent of resolving the inconsistency.

Exemption from compliance with these guidelines will only be granted on the basis of a national emergency, extreme urgency or other extraordinary reasons considered appropriate by the CAO.

15.0 BREACH OF POLICY GUIDELINES

Non-compliance of this policy is furthermore deemed as a breach and will be referred to the relevant source for corrective measures and/or disciplinary action.

16.0 POLICY REVIEW

This policy must be informally reviewed at least once each year and be altered or amended when amendments to legislation and/or other policies necessitate amendments to this policy.

APPENDIX I (Key Messages)

In keeping with Section 5 of this Policy, below represents sample key messages of the Corporation. As per Section 5, the custodian of Corporate messaging is the CAO and Council. In this capacity, the CAO shall, with the input and guidance of the Council keep a list of key messages that support the Corporate Brand. Moreover, the CAO shall review this list annually and present any changes to Council (if required) for their information.

Key Messages

1. Fiscal prudence continues to guide the actions of Council and staff.
2. Council and staff are focused on public service and community betterment.
3. The Municipality of Strathroy-Caradoc is a great place to live, work and play.
4. Strathroy-Caradoc is open for business.
5. Strathroy-Caradoc boasts a skilled workforce, reliable transportation, advanced telecommunications networks, and a welcoming population.
6. In Strathroy-Caradoc we cherish our history and look forward to a future that is bright and prosperous for every resident.
7. The preservation and showcasing of history, for the purposes of outreach, education and for the general betterment of the population, is an important function of the Municipality.

APPENDIX II

(General Website and Social Media Guidelines and Procedures)

In keeping with Section 5 of this Policy, below represents general website and social media guidelines and procedures. As per Section 5, the custodian of this information is the CAO and Council. In this capacity, the CAO shall, with the input and guidance of the Council keep this document current and relevant. Moreover, the CAO shall review this Appendix annually and present any changes to Council (if required) for their information.

Nothing contained in Appendix II supersedes items noted within the main body of this policy.

1. WEBSITE PURPOSE

The Municipality of Strathroy-Caradoc maintains multiple websites. The primary sites are www.strathroy-caradoc.ca; and www.strathroymuseum.ca. For the purpose of this document, websites shall be collectively referred to as Municipality of Strathroy-Caradoc website or websites unless specified otherwise.

The Municipality of Strathroy-Caradoc website replicates, in an electronic manner, many of the services offered by municipal staff and officials. The primary purpose of the municipality's website is to convey information to users; not necessarily to facilitate real-time dialogue between the users.

Communications made through social media shall not constitute legal notice to the Municipality of any of its agencies, officers, employees, agents or representatives, with any respect to existing or potential claims or cause of action against the municipality or any of its agencies, officers, employees, agents or representatives, where notice to the municipality is required by any federal, provincial, or local laws, rules, or regulations.

1. A) Website Goals

The goals of the Municipality of Strathroy-Caradoc's website are:

- To provide information about municipal programs, services, activities, amenities, and events;
- To provide, as resources permit, an electronic way of allowing residents to conduct various types of business with the Municipality;
- To promote the Municipality of Strathroy-Caradoc's economic, social, and cultural quality of life and/or opportunity; and
- To further the interests of local agencies, associations, and businesses that support the municipality's goals, policies, and purposes.

1. B) Hyperlink Guidelines

The purpose of the Municipality's website is to provide information about its government, services, and attractions. The Municipality's website may, from time-to-time, provide

hyperlinks to websites outside the municipality's website. The municipality is not responsible for, and does not endorse, the information on any hyperlinked website unless the Municipality's website specifically states otherwise. The following criteria will be used by the municipality to decide whether to grant requests for hyperlinks from its website.

The municipality's website may provide hyperlinks to websites for:

- Government and educational institutions;
- Organizations with some economic or subject matter relationship to the municipality (including but not limited to those contracting with the municipality, those sponsoring municipal activities or programs, and those participating in municipal activities or programs);
- Generally recognized community or civic organizations with a connection to the Municipality;
- Organizations providing information about art, cultural, and sporting activities in the municipality; and/or
- Organizations related to the municipality's tourism industry or opportunities.

The municipality's website shall not typically provide hyperlinks to websites for:

- Candidates for any elected office, other than as permitted in the *Strathroy-Caradoc Use of Corporate Resources Policy*;
- Sources advocating positions or practices that are inconsistent with the values espoused by the Municipality (i.e.: content seeking to incite crime, violence or gender inequality);
- Discussion groups, chat rooms, bulletin boards, and other largely unedited content created by individuals who are not owners, operators, or agents of a Strathroy-Caradoc website;
- Partisan political organizations; and/or
- Individual or personal home pages;

Websites that have been approved and linked from the municipality's website, but subsequently demonstrating any of the above categories of content, will typically be unlinked from the municipality's website without notice or compensation of any kind.

1. C) Privacy Guidelines

The protection of individual privacy is a primary concern to the Municipality of Strathroy-Caradoc, and is governed by local, provincial and federal laws and regulations. Accordingly, the Municipality has created a privacy statement in order to demonstrate and guide its commitment to privacy. The following statement discloses the Municipality's information gathering and dissemination practices as they relate to the Municipal website.

No personally identifiable information is automatically collected about visitors who simply browse the municipality's website or who download information from it.

The Municipality's web servers maintain logs of user activity in order to help manage the website. Information stored in these logs does not identify the user personally. The logs store such things as the domain name and IP address from

which a user accessed the municipality's website; the type of browser and operating system they used; the date and time they accessed the website; the pages they visited; and the country or region of the world from which they accessed the website.

The Municipality uses this information internally to learn how many visitors the website has, where they are coming from, which parts of the municipality's website are of most interest to visitors, for security, and other facts that will help improve the website and the services offered.

The municipality values user feedback. If users participate in a survey or send an email, their email address and any other information they have volunteered will be collected. Visitors who request services through this website may be required to furnish additional information in order to provide the service requested. The additional information collected will be no more specific than if the visitor were requesting the service by any other means, including by telephone or an in-person visit to a municipal facility. The Municipality may share this information with another government agency or organization if the disclosure is required as part of the service requested. Information may also be made available to police if the information is material to a police investigation or if the Municipality is ordered to disclosed the data by a court.

While no website can protect itself against all eventualities, every effort is made to protect any sensitive personal information provided by users. The Municipality will not rent, sell or give away any information identifying users individually (name, address, phone number, etc.) to third parties for marketing purposes.

As a government agency, the municipality is governed by freedom and access to information statutes as enacted from time-to-time by senior levels of government. Users must understand that some business they conduct with the Municipality of Strathroy-Caradoc becomes a matter of public record. Public records, as defined by the appropriate statute, and not made confidential elsewhere in law, may be posted for electronic access through the website. This includes most municipal permits applied for, or requests for a municipal service. These same records have long been open for public inspection by anyone requesting them in person, by mail or by telephone at the appropriate government office. All information on the municipal website is public information.

1. D) Disclaimer of Liability

The Municipality of Strathroy-Caradoc shall not be held liable for any improper or incorrect use of the materials or information contained on the website and assumes no responsibility for any user's use of them. In no event shall the Municipality of Strathroy-Caradoc be liable for any damages, whether direct, indirect, incidental, special, exemplary or consequential (including, but not limited to, business interruption or loss of use, data, or profits) regardless of cause, and on any theory of liability, whether in contract, statute, strict liability, or tort (including negligence or otherwise) arising in any way out of the use of this website or the materials and information contained on Municipal websites, even if advised of the possibility of such damage. This disclaimer of

liability applies to any damages or injury, including but not limited to those caused by any failure of performance, error, omission, interruption, deletion, defect, delay, computer virus, communication line failure, theft, or destruction of data, whether for breach of contract, tortious behavior, statutory liability negligence, or under any other cause of action.

Users are encouraged to consult with appropriate and accredited professional advisors for advice concerning specific matters before making any decision, and the Municipality of Strathroy-Caradoc disclaims any responsibility for positions taken by individuals or corporations in their individual cases or for any misunderstanding and losses, directly or indirectly, on the part of any user.

1. E) Disclaimer of Warranties / Accuracy and Use of Information

The materials posted on the municipal website are provided “as is” and without warranties of any kind expressed or implied. To the fullest extent permissible under applicable law, the Municipality of Strathroy-Caradoc disclaims all warranties, expressed or implied, including but not limited to, implied warranties of merchantability, fitness for a particular purpose and title to any of the materials provided on this website. The Municipality of Strathroy-Caradoc does not represent or warrant that the functions contained in the materials will be uninterrupted or error-free, that defects will be corrected, or that this website or the server that makes it are free of viruses or other harmful components. The Municipality of Strathroy-Caradoc does not warrant or make any representations regarding the use or the results of the use of the materials in this website, or through links to other websites, in terms of their correctness, accuracy, reliability or otherwise. The user (and not Municipality of Strathroy-Caradoc) assumes the entire cost of all necessary servicing, repair, or correction.

Changes are made periodically to many municipal documents, including municipal by-laws, regulations, guidelines, and schedules, and these changes may or may not be reflected in the materials or information present on the Municipality of Strathroy-Caradoc’s website. Additionally, because the website is frequently under development, materials and information may be deleted, modified or moved to a different part of the website by the municipality without advance notice.

2. ONLINE SOCIAL MEDIA GUIDELINES

Background

Every day, people discuss and debate municipal services and issues in online conversations. The Municipality of Strathroy-Caradoc recognizes the importance of engaging in these online conversations and is committed to engage in online social media in an appropriate manner.

This document serves as a general framework for the Municipality of Strathroy-Caradoc social and online engagement and is categorized into the following sections:

- Recommended Social Media Tools;
- Guiding Principles for Online Social Media;
- Online Social Media Contributors; and

- Monitoring.

Social Media Channels

The Corporation may utilize online social media platforms such as: Facebook, Twitter, Instagram, YouTube and other options that emerge from time-to-time.

Each municipal social networking platform will, if technically possible and appropriate, include an introductory statement to clearly specify the purpose. Where possible, the social networking site should link back to the official Municipality of Strathroy-Caradoc website for more in-depth information.

Facebook Vision Statement

We welcome Facebook postings. Before posting to the Facebook page, it is to be noted, the information on the page is for the purpose of sharing municipal-related information only. The Municipality of Strathroy-Caradoc is not responsible for the comments made by fans or members of this page and reserves the right to remove any content that is inappropriate. Posting on the Facebook page by fans or members is not considered “official” notice to the Municipality.

Facebook Rules of Conduct

Content, posts, photographs, and comments containing any of the following content may be removed at the discretion of the Municipality of Strathroy-Caradoc:

- Comments unrelated to the Municipality of Strathroy-Caradoc;
- Profane language or content;
- Content that promotes, fosters, or perpetuates discrimination (race, creed, colour, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability, or sexual orientation);
- Sexual content or links to sexual content;
- Commercial advertising;
- Content encouraging illegal activity;
- Information that may compromise the safety or security of the public or public systems;
- Violation of legal ownership interest of any other party (copyright and intellectual property infringement);
- Content for the purposes of promoting a candidate for municipal, provincial, or federal election;
- Content deemed inappropriate by the Municipality of Strathroy-Caradoc.

Twitter Vision Statement

Our goal is to provide a service that allows visitors, residents and ratepayers to discover and to learn about Strathroy-Caradoc. We respect the ownership of the content we share and will demonstrate and demand a respectful tone in all exchanges.

YouTube Vision Statement

The Municipality of Strathroy-Caradoc may create/maintain a YouTube channel for posting videos showcasing Strathroy-Caradoc.

Guiding Principles for Social Media for Municipal Staff

These online social media principles are intended to outline how Municipality of Strathroy-Caradoc values should be demonstrated in the social media space and to guide staff participation in this area, both when staff are acting on behalf of the Corporation or participating personally. It must be understood that all comments made by staff, whether online or in-person, may have an impact on their employment status, even if the comments are made during off-work hours.

For clarity, terms such as “municipal staff” and “employee” are intended to reference any person (including volunteers) acting in a capacity as an agent for the Corporation.

Principles and Values Expectations

- **Transparency in social media engagement:** The Municipality does not condone manipulating the social media conversation by creating “fake” posts designed to mislead followers and control a conversation. Every website, “fan page,” or other online destination that is ultimately controlled by the Municipality must make that fact known to users and must be authorized according to applicable internal protocols in order to track and monitor the Municipality’s online presence.
- **Protection of our citizens’ privacy:** The Municipality will be conscientious regarding any personally identifiable information collected, including how that information is collected, stored, used, or shared; all of which shall be done pursuant to applicable legal and regulatory expectations.
- **Respect of copyrights, trademarks, rights of publicity, and other third-party rights in the social media space, including user-generated content:** The Municipality shall be respectful of all intellectual property rights. This belief will be asserted by defining the Municipality’s online and social media contributors whose responsibility will lie in speaking/responding on the Municipality’s behalf. These individuals will work with appropriate staff and departments to make informed and sound responses.
- **Online and Social Media Contributors**
Just as with traditional media, the Municipality has an opportunity – and a responsibility – to effectively manage the Corporation’s and/or community’s reputation online and to selectively engage and participate in online conversations that mention the Municipality.

The recommendation is to utilize and maintain a single corporate account for each approved social media platform. This approach will:

- Allow for efficient use of time and resources to build followers to a single account;
- Minimize credibility risk;
- Provide consistency;
- Provide a single-desk point of access for Municipal information;
- Minimize legal risks through dedicated oversight of content; and
- Provide transparent oversight, control and management of accounts.

It is understood that the Strathroy-Caradoc Police, the Strathroy-Caradoc Fire Department and the Museum shall have the ability to utilize and maintain social media accounts and identities separate from the primary Municipal accounts (when approved by the CAO or a Communications Designate of the CAO). It is also understood that the outputs associated with those accounts shall adhere to all Municipal policies as though they were the primary Municipal accounts.

It is important to emphasize the difference in speaking “on behalf of the Municipality” and speaking “about” the Municipality. For clarity on this point, consult the Corporate Communications Policy (and see below).

The following concepts and principles constitute an informal guide how social media contributors must represent the Municipality in an official capacity when they are speaking “on behalf” of the Municipality. Lack of online compliance shall be subject to progressive discipline as appropriate:

- **Be recognized as an official social media contributor:** Any person who officially represents the Municipality must be recognized by the Chief Administrative Officer prior to beginning or continuing these activities.
- **Follow the Corporation’s policies:** Representatives of the Municipality must act with honesty and integrity in all matters. This commitment is true for all communications.
- **Be mindful that you are representing the Corporation.** Representatives of the Municipality must convey the same positive, respectful and informative spirit and tone that the Municipality instills in all of its communications. Profanity, inappropriate use of language or images, lack of respect and misinformation would not be tolerated in the physical workplace and the same standards and policies apply online.
- **Fully disclose your affiliation with the Municipality:** All those who are communicating on behalf of the Municipality should disclose their name and their affiliation. It is never acceptable to use aliases or otherwise deceive people.
- **Keep records:** Municipal spokespeople are expected to track and retain records associated with their interactions. Because online conversations are often fleeting and immediate, it is important to keep accurate records when officially representing the Municipality. This is required as online statements are held to the same legal standards as traditional media and communication outputs.
- **When in doubt, do not post:** Employees are personally responsible for their words and actions, wherever they are. Online contributors must ensure that all posts are completely accurate and that they do not reveal non-public information about the Corporation. If there is any doubt with respect to the appropriateness of any post or interaction - DO NOT POST. In circumstance of uncertainty, the CAO shall be consulted prior to posting.

- **Give credit where credit is due and don't violate others' rights:** The Municipality and/or its spokespeople shall not claim authorship or ownership of anything that is not so owned. Copyrights, trademarks, publicity rights, or other rights shall not be used or referenced without the necessary permissions of the rights-holder.
- **Remember that even the smallest posts can have large ramifications:** Municipal spokespeople must be mindful that the way that you answer an online question might be accurate but can be misinterpreted or misconstrued. A "comprehensive view" is encouraged during all conversations and communications exercises.
- **Know that the Internet is permanent:** Once information is published online, it is part of a permanent record, even if removed or deleted. If a complete thought, along with its context, cannot be expressed in a character-restricted space (such as Twitter), a link to an online space where the message can be expressed completely and accurately shall be provided.