

Social Media Policy - Borough of Metuchen, New Jersey

Purpose

This policy sets forth guidelines for the establishment and use by the Borough of Metuchen ("the Borough") of all social media sites (including but not limited to Facebook and Twitter) as a means of conveying Metuchen-related information to its residents, employees and visitors. The Borough has an overriding interest and expectation in deciding what is "spoken" on behalf of the Borough on its social media sites.

For purposes of this policy, "social media" is understood to be content created by individuals, using accessible, expandable, and upgradable publishing technologies, through and on the Internet. Examples of social media include Facebook, blogs, MySpace, RSS, YouTube, Second Life, Twitter, LinkedIn, Delicious, and Flickr. For purposes of this policy, "comments" include information, articles, pictures. It also includes other communication medium created by the Borough including but not limited to Nixle, reverse 911 and/or Metuchen TV.

Scope

This policy shall apply to all Municipal agencies and departments as well as any affiliated government or non-government agency or official and/or commission or council permitted by the Borough to post on Borough social media sites.

General Policy

1. No Borough of Metuchen social media site shall be established without prior approval of the Borough Administrator. The use by any municipal department of the Borough's social media sites are subject to approval by the Borough Administrator or his/her designees. All Metuchen social media sites shall be administered by the Borough Administrator and/or his/her designee.
2. The Borough social media sites shall clearly set forth that they are maintained by the Borough and that they follow this Social Media Policy.
3. Wherever possible, the Borough social media sites should link back to the official Metuchen website for forms, documents, online services and other information necessary to conduct business with Metuchen.
4. The Borough of Metuchen social media sites are not to be used for making any official communications to the Borough, for example, reporting crimes or misconduct, reporting dangerous conditions, giving notice required by any statute by, ordinance or regulations such as but not limited notices of claim. Prominent notice of this paragraph shall be displayed on every Borough social media site, along with the appropriate contact information for submitting official communications.
5. This social media policy shall be placed on the Metuchen Borough Website and all social media sites.
6. The Borough Administrator and/or his/her designee shall monitor Borough social media sites to ensure adherence to both this Social Media Policy and the interest and goals of the Borough. Metuchen has the right and will restrict or remove any content that is deemed in violation of this Social Media Policy or any applicable law. Any content removed based on these guidelines will be retained by the Borough Administrator and/or her/her designee pursuant to the applicable Borough retention policy, including the time, date and identity of the poster, when available.
7. These guidelines must be displayed to users or made available by hyperlink.
8. The Borough will approach the use of social media tools as consistently as possible, enterprise wide.
9. The Metuchen website at www.Metuchennj.org will remain the Metuchen's primary and predominant internet presence.

10. The Borough social media sites and this Policy are subject to all applicable federal and NJ laws and regulations, as well as applicable record retention requirements.
11. Employees representing The Borough's government via its social media sites must conduct themselves at all times as a representative of The Borough and in accordance with all its policies.
12. This Social Media Policy may be revised at any time by approval of the Borough Council.

Comment Policy

1. As a public entity the Borough must abide by certain standards to serve all its constituents in a civil and unbiased manner.
2. The intended purpose behind establishing the Borough social media sites is to disseminate information from the Borough, about Metuchen, to its residents, employees and visitors.
3. Comments containing any of the following inappropriate forms of content shall not be permitted on The Borough social media sites and are subject to removal and/or restriction by the Borough Administrator and/or his/her designees.
 - a. Profane, obscene, violent, or pornographic content and/or language, or sexually suggestive or links to such materials. Any image or link containing minors or suspected minors in sexual and/or provocative situations will be reported to law enforcement.
 - b. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, or national origin, marital status, status with regard to public assistance, physical or mental disability or sexual orientation;
 - c. Defamatory attacks;
 - d. Threats to any person or organization;
 - e. Solicitation of commerce, including but not limited to advertising of any business or product for sale;
 - f. Conduct in violation of any federal, state or local law;
 - g. Encouragement of illegal activity;
 - h. Information that may tend to compromise the safety or security of the public or public systems; or
 - i. Content that violates a legal ownership interest, such as a copyright, of any party the Borough does not permit or allow copyright infringing activities and/or infringement of intellectual property rights on its website or social media sites and will remove any and all content and Submissions if properly notified that such content and/or Submission infringes on another's intellectual property rights.
 - j. Private contact information such as names, addresses and phone numbers no matter how easily obtained elsewhere.
 - k. Personal information of a person other than the poster.
 - l. Spamming or repetitive content.
 - m. Comments from children under 13 cannot be posted in order to comply with the Children's Online Privacy Protection ACT. By posting on a Borough media site, users acknowledge that they are at least 13 years old;
4. A comment posted by a member of the public on any Metuchen social media site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of, or agreement by, The Borough, nor do such comments necessarily reflect the opinions or policies of the Metuchen.
5. Any attempt to hack or otherwise compromise the Borough's internet or social media sites will be reported to law enforcement and the perpetrator will be denied access to the sites.
6. Metuchen reserves the right to deny access to its social media sites for any individual, who violates the Metuchen Social Media Policy, at any time and without prior notice.

7. Municipal Departments shall monitor their social media sites for comments requesting responses from The Borough and for comments in violation of this policy.
8. When a Borough employee responds to a comment, in his/her capacity as a Borough employee, the employee's name and title should be made available, and the employee shall not share personal information about himself or herself, or other Borough employees.
9. All comments posted to any Metuchen Facebook site are bound by any applicable terms and conditions Facebook's Statement of Rights and Responsibilities, located at <http://www.facebook.com/terms.php>, and The Borough reserves the right to report any violation of Facebook's Statement of Rights and Responsibilities to Facebook with the intent of Facebook taking appropriate and reasonable responsive action. All Borough policies are applicable to interactions on social media sites when acting in an official capacity and representing the Borough.

Breach of Policy

1 Staff may be required to remove internet postings on Borough social media sites which are deemed to constitute a breach of Policy, as determined by the Borough Administrator subject to applicable archiving and retention requirements.

2. Any social media site created by a Borough employee, Borough official and/or Borough entity and/or commission and/or Borough official remains the property of the Borough, including all the followers and friends generated by the site. If the person who created the site leaves the employment of the Borough, or leaves a Borough commission, they must relinquish everything related to the site including user names, passwords and/or access codes or information.

Terms of Use Disclosure (to be posted on all Borough Social Media Sites)

A. Information Disclaimer

By visiting this site, you understand and agree that the Metuchen government site is provided "AS IS". Metuchen government makes every effort to provide accurate and complete information on this website. The information contained herein is not official nor in any way shall it be deemed to constitute legal notice where such legal notice is required by law. The information contained in this site is provided as a service and convenience to people needing information about Borough of Metuchen government. Portions of the information on this site may be incorrect or not current. Borough of Metuchen government, its officers, employees or agents shall not be liable for damages or losses of any kind arising out of or in connection with the use or performance of information, including but not limited to, damages or losses caused by reliance upon the accuracy or timeliness of any such information, or damages incurred from the viewing, distributing, or copying of those materials.

B. Linking Policy

Links To External Sites

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C. Endorsement Disclaimer

Reference in this website to any specific commercial products, processes, or services, or the use of any trade firm or corporation name is for

the information and convenience of the public, and does not constitute endorsement, recommendation, or favoring by Borough of Metuchen government or its officers, employees or agents.

D. Copyright and Trademark Limitations

Borough of Metuchen government makes no warranty that materials contained herein are free of copyright or trademark claims or other restrictions or limitations on free use or display. Making a copy of such material may be subject to copyright or trademark laws.

E. Use of material from this site

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F. Unauthorized Modifications

Unauthorized attempts to modify or otherwise alter any information or image stored on any Borough of Metuchen government website may result in criminal prosecution.

SOCIAL MEDIA POLICY BOROUGH OF NEW MILFORD, NEW JERSEY

PURPOSE

The Borough of New Milford (Borough) has a compelling interest in what is presented on behalf of the Borough on social media sites. This policy sets forth guidelines for the creation and use of all social media sites by Borough entities, employees and volunteers that wish to convey or disseminate Borough-related information to its residents, employees and visitors.

DEFINITIONS

"Social media" shall include but not be limited to Facebook, blogs, MySpace, RSS, YouTube, Twitter, LinkedIn, Delicious, Flickr, Google Plus, Instagram, Pinterest, websites, discussion blogs and forums, XING, Digg and Reddit and shall extend to and include all future forms of social media.

"Borough-related information" shall refer to comments, information, articles, pictures, photos and other images. Content on Borough-created social media sites such as Nixle and reverse 911 may only be posted by duly authorized personnel.

"Borough entity" shall refer to boards, commissions, committees, departments and any other group organized or created by the Borough or reporting to it.

SCOPE

This policy shall apply to all Borough entities and the volunteers and employees who are members of those entities acting in their capacity as members.

This policy does not apply to individuals who post as individuals and not on behalf of the Borough or a Borough entity.

The Borough's official website shall remain www.NewMilfordBoro.com.

GENERAL POLICY

A social medium may be created and/or used by Borough entities so long as its creation and/or use conform to the requirements listed herein.

The creation and use of social media sites by Borough entities are subject to prior approval by the Borough Administrator.

Any Borough entity, employee or volunteer that receives permission from the Borough Administrator to create or use social media shall clearly state that it is authorized to do so by the Borough and that it follows this Social Media Policy.

Social media shall be used solely to convey information about the entity posting it. No

personal information or personal opinions shall be posted by the entity, employee or volunteer.

Any Borough entity creating or using a social medium shall designate a member(s) of that entity to post and monitor the site.

This Social Media Policy shall be posted on the official Borough website.

All social media sites created or used by Borough entities authorized to do so shall have a hyperlink to this Social Media Policy on the Borough website.

Where appropriate, the social media sites created/used by Borough entities shall link back to the official Borough website for forms, documents, online services and other information necessary to conduct business within the Borough.

Borough entities shall not use social media to make any official Borough communications to the public other than those specifically referencing the activities of that entity. Accuracy of information is of vital importance and must be considered a priority when posting.

The use of social media by Borough entities may be monitored by the Borough Administrator or other individual so designated by the Borough Administrator to insure adherence to both this Social Media Policy and the interests and goals of the Borough.

The Borough has the right to and will restrict or remove any content that it deems in violation of this Social Media Policy, any applicable law or for any other reason it deems appropriate.

All Borough entities, employees and volunteers creating/using social media sites are subject to all applicable federal and New Jersey laws and regulations as well as applicable record retention requirements.

All Borough entities and their members as well as elected officials representing the Borough's government via its/their social media sites shall conduct themselves at all times as representatives of the Borough and in accordance with all of its policies.

All postings by Borough entities should be spelled correctly and use good grammar.

Any social media sites created by a Borough employee, Borough volunteer, Borough official and/or Borough entity remains the property of the Borough, including all the followers and friends generated by the site and may be deleted by the Borough if it deems it appropriate to do so.

All site names, passwords and/or access codes or information or changes to these shall be filed with the Borough Administrator and updated within two days of any change.

If the person who created the social medium site leaves a Borough entity, the passwords and/or access codes to the site shall be changed and the new information filed with the Borough Administrator within two days of the change.

This Social Media Policy may be revised at any time by approval of the Borough's Mayor

& Council.

COMMENT POLICY

1. All comments, articles and the like posted on social media by Borough entities and their members must be civil and unbiased.
2. The following are prohibited and postings containing any of the following are subject to removal by the Borough.

Profane, obscene, violent, sexually suggestive or pornographic content and/or language or links to such materials.

Images or links containing minors or suspected minors in sexual and/or provocative situations. These will be reported to law enforcement.

Photographs or images of children without permission of their parents or guardians.

Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, national origin, marital status, sexual orientation, physical or mental disability or the receipt of public assistance.

Defamatory, racist and anti-Semitic remarks.

Threats to any person or organization.

Solicitation of commerce including, but not limited to, advertising of any business or product for sale with the exception of Borough-sponsored events and/or items.

Solicitation of political support or political contributions.

Conduct in violation of any federal, state or local law or ordinance.

Encouragement of illegal activity.

Information that may tend to compromise the safety or security of the public or public systems.

Content that violates a legal ownership interest, such as a copyright or other infringement on intellectual property rights.

Private contact information such as names, addresses, phone numbers, email addresses.

Personal information about a person without that person's permission.

Spamming or repetitive content.

Comments from and participation of children under 18 in compliance with the

Children's Online Privacy Protection Act.

3. A comment posted by a member of the public on any entity-created social media site is the opinion of the commenter or poster only and publication of a comment does not imply endorsement of or agreement by the Borough nor do such comments necessarily reflect the opinions or policies of the Borough. Such a comment may be removed, however, if the Borough deems it appropriate to do so.
4. Any attempt to hack or otherwise compromise the Borough's Internet or social media sites will be reported to law enforcement and the perpetrators will be denied access to the sites.
5. The Borough reserves the right to deny access to any social media sites created/used by Borough entities to any individual who violates the Borough's Social Media Policy at any time and without prior notice.
6. Borough entities shall monitor the comments on their social media sites for violations of this policy.
7. In the event a Borough employee responds to a comment in his/her capacity as a Borough employee, the employee's name and title shall be included in the response.
8. No Borough employee or volunteer shall share personal information about him/herself or other Borough employees or volunteers. No Borough entity shall share personal information about any member of the entity.
9. In the event that the Borough creates its own Facebook page, all comments posted are bound by Facebook's Statement of Rights and Responsibilities. The Borough reserves the right to report any violation of Facebook's Statement of Rights and Responsibilities to Facebook with the intent of Facebook taking appropriate and reasonable responsive action.
10. All Borough policies are applicable to interactions and postings on social media sites when acting in an official capacity and representing the Borough.

BREACH OF POLICY

Internet postings on Borough social media sites that are deemed to constitute a breach of this Policy as determined by the Borough Administrator shall be removed subject to applicable archiving and retention requirements. If a social media site is frequently in violation of this Policy, it shall be permanently deleted.

Any entity found by the Borough Administrator to have violated any aspect of this Policy shall be banned from having a presence on social media for a period of time deemed appropriate by the Borough.

Any Borough employee or volunteer found by the Borough Administrator to have violated any aspect of this Policy shall be banned from having a presence on social media for a period of time deemed appropriate by the Borough.

Any illegal activity shall be reported to the appropriate authorities.

SOCIAL MEDIA and PUBLIC OUTREACH POLICY & PROCEDURE – BOROUGH OF WALDWICK, NEW JERSEY

PURPOSE

This policy sets forth guidelines for the establishment and use by the Borough of Waldwick ("the Borough") of its Social Media sites and public outreach tools (Facebook, YouTube, Twitter, Website, Electronic Sign, E-mail Blast, Public Access TV PowerPoint and any future approved media – hereinafter collectively "Social Media") as a means of conveying Borough-related information to its residents, employees and visitors. The Borough has an overriding interest and expectation in deciding what is "spoken" on behalf of the Borough on its Social Media sites and what information get disseminated through its public outreach tools.

The purpose of this Social Media and Public Outreach policy is to establish enforceable rules for the use of Social Media by Borough officers and employees when engaged in Borough business. Social Media and Public Outreach tools at this time refers to Facebook, YouTube, Twitter, Website, Electronic Sign, E-mail Blast, Public Access TV PowerPoint and any other communication whether or not such communication is open to response or comment. Rules are necessary to assure that communications made on behalf of the Borough are properly authorized and in correct form; that communications to the municipality by means of social media which can be viewed by the public are appropriate and pertinent; that all communications to the municipality is related to the posted municipal information; and that the sender is clearly and fully informed that a message received by means of Social Media is not a substitute for required reporting procedures.

For purposes of this policy, "social media" is understood to be content created by individuals, using accessible, expandable, and upgradable publishing technologies, through and on the Internet. Examples include Facebook, YouTube and Twitter. "Public Outreach Tools" is understood to be content created by individuals and published on the Website, Electronic Sign, E-mail blast and Public Access TV PowerPoint. For purposes of this policy, "comments" include information, articles, pictures, and any other written or communicated words or phrases.

SCOPE

1. This policy shall apply to all Municipal agencies and departments as well as any affiliated government or Waldwick sponsored clubs or organizations, and organizations hosting an event for a non-profit organization in Waldwick or official and/or commission or council permitted by the Borough to post on Borough Social Media sites and Public Outreach Tools.

GENERAL POLICY

The objective of the use of Social Media and public outreach tools by the Borough or its departments is to expand and facilitate the dissemination of information from the Borough to its residents, taxpayers and the general public.

1. No Borough Social Media site shall be established without prior approval of the Borough Council. The following Social Media sites and Public Outreach tools are approved under the direction of the Borough Administrator or his/her designee – Facebook, YouTube, Twitter, Website, Electronic Sign, E-mail Blast and TV Public Access PowerPoint. The Borough Social Media site and public outreach tools shall be administered by the Borough Administrator or his/her designee. The Administrator or his/her designee shall designate a representative from any Borough Department or Organization to administer their own social media sites in accordance with this policy.
2. The Borough Social Media sites and public outreach tools shall clearly set forth that they are maintained by the Borough and that they follow this Social Media and Public Outreach Policy.
3. Wherever possible, the Borough Social Media sites should link back to the official Borough website for forms, documents, online services and other information necessary to conduct business with the Borough.
4. The Borough Social Media sites are not to be used for making any official communications to the Borough, for example, reporting crimes or misconduct, reporting dangerous conditions, requesting an inspection, giving notice required by any statute by, ordinance or regulations such as but not limited to notices of claim. Prominent notice of this paragraph shall be displayed on every Borough Social Media site, along with the appropriate contact information for submitting official communications.
5. This Social Media policy shall be placed on the Borough Website and all Borough Social Media sites and public outreach tools.
6. The Borough Administrator or his/her designee shall monitor Borough Social Media sites and public outreach tools to ensure adherence to both this Social Media and Public Outreach Policy and the interest and goals of the Borough. The Borough has the right and will restrict or remove any content that is deemed in violation of this Policy or any applicable law. Any content removed based on these guidelines will be retained by

the Borough Administrator and/or her/her designee pursuant to the applicable Borough retention policy, including the time, date and identity of the poster, when available.

7. These guidelines must be displayed to users or made available by hyperlink.
8. The Borough will approach the use of Social Media tools as consistently as possible, Borough-wide.
9. The Borough website at www.waldwicknj.org will remain the Borough's primary and predominant internet presence.
10. The Borough's Social Media sites and this Policy are subject to all applicable federal and NJ laws and regulations, as well as applicable record retention requirements.
11. Employees and Volunteers representing the Borough's government via its Social Media sites shall conduct themselves at all times as a representative of the Borough and in accordance with the Employee Rules and Regulations manual.
12. This Social Media and Public Outreach Policy may be revised at any time by approval of the Borough Council.
13. This policy governs all Social Media and public outreach tools used by or on behalf of the Borough and/or its departments.
14. The Borough shall have a single municipal presence on Social Media approved for use, a Borough Police Twitter account and a Volunteer Fire Department Facebook Page.
15. All Borough presence and activity on Social Media are an integral part of the Borough's information networks and must comply with all rules and policies governing the Borough's computers and electronic media.
16. All Borough use of Social Media is responsible for complying with applicable federal, state, and county laws, regulations, and policies. This includes adherence to established laws and policies regarding copyright, records retention, Freedom of Information Act (FOIA), Open Public Record Act (OPRA), First Amendment, privacy laws, sunshine laws, and information security policies (if applicable) established by the Municipality.
17. All Municipal policies are applicable to interactions on Social Media sites when acting in an official capacity and representing the Municipality.

COMMENT POLICY

1. As a public entity the Borough must abide by certain standards to serve all its constituents in a civil and unbiased manner.
2. The intended purpose behind establishing the Borough Social Media sites and public outreach tools is to disseminate information from the Borough about the Borough to its residents, employees and visitors.
3. A comment posted by a member of the public on any Borough Social Media site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of, or agreement by, the Borough, nor do such comments necessarily reflect the opinions or policies of the Borough.
4. Any attempt to hack or otherwise compromise the Borough's internet or Social Media sites will be reported to law enforcement and the perpetrator will be denied access to the sites.
5. The Borough reserves the right to deny access to its Social Media sites for any individual who violates the Borough of Waldwick's Social Media and Public Outreach Policy at any time and without prior notice.
6. All comments posted to any Borough sites are bound by any applicable terms and conditions of Facebook's Statement of Rights and Responsibilities, located at <http://www.facebook.com/terms.php>, and the Borough reserves the right to report any violation of Facebook's Statement of Rights and Responsibilities to Facebook with the intent of Facebook taking appropriate and reasonable responsible action. All Borough policies are applicable to interactions on Social Media sites when acting in an official capacity and representing the Borough.
7. All comments posted to any Borough sites are bound by any applicable terms and conditions of Twitter's Terms of Service, located at <https://twitter.com/tos>, and the Borough reserves the right to report any violation of Twitter's Terms of Service to Twitter with the intent of Twitter taking appropriate and reasonable responsible action. All Borough policies are applicable to interactions on Social Media sites when acting in an official capacity and representing the Borough.
8. All comments posted to any Borough sites are bound by any applicable terms and conditions of YouTube's Terms of Service, located at <https://www.youtube.com/t/terms>,

and the Borough reserves the right to report any violation of YouTube's Terms of Service to YouTube with the intent of YouTube taking appropriate and reasonable responsible action. All Borough policies are applicable to interactions on Social Media sites when acting in an official capacity and representing the Borough.

9. All comments posted to any future Social Media medium or site shall be bound by such site's applicable terms and conditions regarding such posting or commenting.
10. No Borough employee, Borough elected official, vendor performing work or providing services to the Borough, or volunteer may post or comment on a Borough Social Media site.
11. Persons posting prohibited content are subject to being barred from posting comments on Borough Social Media.

PROHIBITED CONTENT

Comments containing any of the following inappropriate forms of content shall not be permitted on the Borough's Social Media sites or public outreach tools and are subject to removal and/or restriction by the Borough Administrator or Chief of Police or their designees.

- a. Profane, obscene, violent, or pornographic content and/or language, or sexually suggestive or explicit content links to such materials. Any image or link containing minors or suspected minors in sexual and/or provocative situations will be reported to law enforcement;
- b. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, or national origin, marital status, status with regard to public assistance, physical or mental disability or sexual orientation;
- c. Reference to any political party or activity of a political party
- d. Reference to any religious belief
- e. Reference to any private interests group or activity of a private interests group
- f. Defamatory attacks;
- g. Threats to any person or organization;
- h. Solicitation of commerce, including but not limited to advertising of any business or product for sale;
- i. Conduct in violation of any federal, state or local law;
- j. Encouragement of illegal activity or illegal activity;

- k. Information that may tend to compromise the safety or security of the public or public systems;
- l. Content that violates a legal ownership interest, such as a copyright, of any party the Borough does not permit or allow copyright infringing activities and/or infringement of intellectual property rights on its website or Social Media sites and will remove any and all content and submissions if properly notified that such content and/or submission infringes on another's intellectual property rights;
- m. Private contact information such as names, addresses and phone numbers no matter how easily obtained elsewhere, unless given approval by the organization; Personal information of a person other than the poster;
- n. Spamming or repetitive content;
- o. Comments from children under 13 cannot be posted in order to comply with the Children's Online Privacy Protection Act. By posting on a Borough Media site, users acknowledge that they are at least 13 years old. Parents are responsible for any minor child's posting or comments;
- p. Content that incites violence;
- q. Comments unrelated to the particular post being commented upon;
- r. Comments containing vulgar, offensive, threatening or harassing language, personal attacks or accusations; and,
- s. Persons posting prohibited content are subject to being blocked and barred from posting comments on Borough Social Media.

BREACH OF POLICY

1. The Borough Administrator or Chief of Police or their designee shall be required to remove internet postings on Borough Social Media sites which are deemed to constitute a breach of Policy, as determined by the Borough Administrator or Chief of Police subject to applicable archiving and retention requirements.
2. Any Social Media site created by the Borough remains the property of the Borough, including all the followers and friends generated by the site. If the person who created the site leaves the employment of the Borough, they must immediately relinquish all

information related to the site including user names, passwords and/or access codes or information.

TERMS OF USE DISCLOSURE *(to be posted on all Borough Social Media Sites)*

A. Information Disclaimer

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B. Linking Policy -- Links To External Sites

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C. Endorsement Disclaimer

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D. Copyright and Trademark Limitations

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E. Use of material from this site

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F. Unauthorized Modifications

Unauthorized attempts to modify or otherwise alter any information or image stored on any Borough of Waldwick website may result in criminal prosecution.

PROCEDURE:

This procedure sets forth the guidelines to having information posted on the Borough of Waldwick's Social Media sites by an organization other than the Borough.

1. Borough of Waldwick information, Borough events and meeting announcements, and emergency notifications take precedent over any other announcements.
2. Requests, including the text of the proposed messages, must be e-mailed to the Borough Administrator and/or his/her designee at least ten (10) days prior to posting the information. The request must contain the following information: full name of organization, time, date and place of the event, contact name, e-mail address and telephone number.
3. Information shall be e-mailed as a Microsoft Word Document in paragraph form (Times New Roman, 12 Font), no PDF or fliers will be accepted.
4. Organization shall include a maximum of two (2) dates of when to post the information.
5. Information will be disseminated for 2 weeks prior to the event.
6. Only Waldwick sponsored clubs or organizations, and organizations hosting an event for a non-profit organization in Waldwick shall be permitting to seek approval to post information on Borough of Waldwick's Social Media sites and public outreach tools.
7. Every effort will be made to accommodate all requests. If many requests are received for the same period of time, the postings will be determined on a first come, first serve basis. The dates of postings, their duration, and content are the final decision of the Borough Administrator and/or his/her designee.

This procedure sets forth the guidelines to having information posted on the Borough of Waldwick's electronic sign by an organization other than the Borough.

1. Borough of Waldwick information, Borough event and meeting announcements, and emergency notifications take precedent over any other announcements.
2. Requests, including the text of the proposed message, must be e-mailed to the Borough Administrator and/or his/her designee at least ten (10) days prior to the event. The request

must contain the following information: full name of organization, time, date and place of the event, contact name, e-mail address and telephone number. The information requested to be posted must be kept to the barest minimum. The sign can hold 3-4 lines of 16-22 characters, depending on the font size.

3. Event announcements will be placed on the sign no more than five (5) days prior to the event. Date(s) and duration of postings will be determined by the number of postings requested. Announcement will be removed the following day after the event.
4. Only Waldwick sponsored clubs or organizations, and organizations hosting an event for a non-profit organization in Waldwick shall be permitting to seek approval to post information on Borough of Waldwick's Social Media sites and public outreach tools.
5. Every effort will be made to accommodate all requests. If many requests are received for the same period of time, the postings will be determined on a first come, first serve basis. The dates of postings, their duration, and content are the final decision of the Borough Administrator and/or his/her designee.

Building Local Government Social Media Policies

Social media is a new world of opportunity for local governments to communicate with citizens and receive feedback. Its risks are similar in nature to those of other types of communication, but with a different twist because material circulates so widely and there are many potential contributors. One recommended tool for addressing these risks is to adopt a social media policy. But what should be in that policy? It is not an easy question to answer.

Many local government social media policies are posted online, but this is an area where one size definitely does not fit all. Social media policies do not stand in isolation. They usually incorporate related policies by reference, and policies that address other issues are often amended to include social media specific provisions. Thus, social media policies are often a web of interrelated policies. Each government must take an individual approach to ensure that all these diverse parts come together to meet its unique needs.

Pools have a strong interest in their members' management of social media risks. They can help their members develop a social media policy by providing suggestions about what a social media policy should do. To assist RISC member pools in this outreach, NLC-RISC has prepared these recommendations about the building blocks for a social media policy. This resource can be used by the pool as a starting point for preparing its own guidelines or can be distributed to pool members under its name.

Control and structure of the government's official social media

Failure to control when and how social media sites are being created and used on behalf of the government sets the stage for losses. The first task for a social media policy is to establish the control structure for the government's official social media program. Three major issues are who has the authority to:

- Establish and terminate official social media accounts.
- Develop and implement the government's social media strategy.
- Develop and enforce a social media policy.

Some governments centralize control over their official social media presence. Centralized programs restrict who can establish an account and require prior review by an identified authority for all posts or comments on behalf of the government. Centralized control has an advantage from the risk control

perspective. It establishes authority and accountability and reduces the chances of a deviation from policy that results in liability.

Other governments decentralize control over their official social media presence to accommodate their operations' different goals and objectives. For example, emergency management may want to tweet alerts and recreation may want to post its activities on a Facebook page. A government might give those operations significant control over their social media presence so they can more nimbly accomplish their goals.

Not all decentralization is the same. The most decentralized approach is a policy that gives some guidelines about acceptable and prohibited use but otherwise allows agencies the freedom to establish social media accounts and pursue their own strategies. A more conservative approach would be a policy that decentralizes day-to-day control subject to general guidelines, but requires prior approval to establish a social media site and designates someone to monitor all the government's social media resources and order necessary changes. For risk control purposes, the more conservative approach offers the advantage of consistent oversight to ensure compliance with policy, combined with a degree of freedom to allow operations to take full advantage of the real-time nature of social media.

Small governments that plan relatively limited use of social media – for example a single Facebook page for the city – will probably use centralized control. Larger governments are likely to have a more decentralized social media program. Both will benefit from a social media policy that outlines the government's official position on social media, identifies who is authorized to participate in the government's official social media sites, and guides them on its implementation. Most of the approaches outlined below are consistent with either a centralized or decentralized approach.

Public records

One of the most difficult issues in local government use of social media is how to comply with the state's public records laws. Some social media posts are akin to casual conversation, but others pertain to official government business. Even comments posted by members of the public may qualify as public records, including those that have been removed as violating the public comment policy. How to draw the line between social media content that does and does not qualify as public records, identify the content that must be retained, and develop an archiving system are all issues of concern to governments using social media.

Many social media policies simply require compliance with the local government's existing public records policy. Three specific social media policy

provisions that an government can consider to facilitate compliance with public records laws are:

- Post all original content to the government's website and use the social media site as a secondary outlet.
- Link back to the official government website for additional information.
- Require employees who post public records to a social media site to ensure that the original document is retained in a manner that complies public record policy.

Guidelines for employee use of the government's official social media

Guidelines for employee use of the government's official social media are a critical part of a social media policy. Even if only one employee posts and responds to comments, that employee must know what is expected and the government must have some way of holding the employee accountable.

The guidelines for use derive from what can go wrong in a social media environment. Some of the major concerns are the following:

- Bad information that misleads the public and causes harm
- Violation of intellectual property rights
- Disclosure of private or confidential information
- Harassment
- Defamation

Any of these can lead to claims and lawsuits. The goal of guidelines is to prevent adverse outcomes.

Guidelines for employee use of the government's official social media encourage some conduct and prohibit other conduct. Some examples of useful positive requirements include:

- Be honest and transparent.
- Post only within one's area of expertise.
- Post only useful information.
- Keep it professional - avoid confrontation.
- Be accurate.
- Correct errors, and if modifying an earlier post, identify the change.
- Be responsive to citizen concerns.
- Adopt a user name that follows a standard format and clearly identifies the user as a city employee.

Employees should be prohibited from posting:

- Information about actual or potential claims and litigation involving the government.
- The intellectual property of others, without written permission.

- Photographs of employees or members of the public, without written permission.
- Defamatory material.
- Any personal, sensitive or confidential information about anyone.
- Obscene, pornographic or other offensive/illegal materials or links.
- Racist, sexist, and other disparaging language about a group of people.
- Sexual comments about, or directed to, anyone.
- Political campaign materials or comments.
- Threatening or harassing comments.
- Other information that is not public in nature.

The policy should also address the sanctions that will be imposed for breach of the policy. Be consistent with, or simply incorporate by reference, the employee discipline policy.

Many of these issues may already be addressed in other policies that can be incorporated by reference or used as a resource. In particular, any code of conduct or ethics should be incorporated by reference. Be consistent with or incorporate by reference website, information technology, communication, media relations, public information and privacy and confidentiality policies should also be considered.

Guidelines for employee use of other social media

Many employees already have purely personal social media accounts they use to interact with friends and family. They also may participate in “professional” social media that are related to their work or profession, but are not their employer’s official site and usually are not a part of their job. An example of professional social media is GovLoop, a social networking site for government workers. Another example is LinkedIn. An employee also might establish a page on what is traditionally a personal social media site, such as a Facebook, for purposes of networking with professional colleagues.

Active participants in professional social networks can gain useful information that will help them do their jobs better, but they may also be more likely to discuss the details of their job on those sites. Their identification with a specific employer means that their posts can easily reflect upon the employer.

Personal and professional social media sites pose risks to the government even if employees access them when they are off-duty and using their own personal devices. Major risks include:

- Disclosure of private or confidential information
- Posting photographs of fellow employees or citizens without their permission

- Harassment
- Retaliation
- Defamation

Looking first at purely personal social media, the entity has little control over employees' actions in their free time using their own personal social media accounts and their own devices. Despite this lack of control, the exposures for the government are very real. Employees sometimes use their personal social media to discuss their jobs and post work-related photographs or information that expose the government to liability or compromise its confidential information. Many interact with co-workers, even with their supervisors/subordinates, and real or perceived slights, harassment, retaliation or discrimination can follow them into the workplace.

Many employees also use personal social media during work hours, either through the government's or the employee's personal technology, such as a smart phone. Personal use of social media through government technology has all the same risks identified above, as well as:

- Reduced work performance
- Downloading to government servers and distributing the same inappropriate content that may be accessed through the Internet.
- Inappropriate use of government property for political, commercial or criminal activity.

A government can prohibit social media at work and adopt blocking and/or monitoring programs for its own technology equipment. These techniques likely will not eliminate the use of personal social media at work, as many employees now have access to social media through their smart phones. However, they will help keep inappropriate content off government servers.

Monitoring employee use of social media and disciplining employees for violating a no-use policy have their own risks. Employees may claim that monitoring invades their privacy and constitutes an unreasonable search. Whether or not the government routinely monitors employees, notify employees in writing that they have no expectation of privacy in their use of government technology. Include the notice in the government's technology policy. If the government needs to access the employee's computer, the notice provides a defense. Also avoid taking job action against an employee based solely on monitoring results. Other factors, such as performance, should be considered.

Professional media sites pose many of the same risks as purely personal sites. They are also more likely to be accessed during work time using the government's technology, often with the government's explicit approval or encouragement. Because professional social media specifically relates to

professional interests, the employee is more likely to be identified with the government and discuss its business than on a purely personal social media site. Disclosing confidential information, casting the government in an unfavorable light, and misrepresenting the government's position are all risks.

To address these risks, consider including in the social media policy:

- A requirement that employees include in any post related to the government or their job on a personal or professional site a disclaimer that the posting reflects their own opinion, and not that of the government.
- By reference, policies that relate to conduct and ethics, privacy and confidentiality, harassment, retaliation and other relevant conduct.
- If monitoring employee use of social media at work, written notice of the nature and scope of monitoring.
- Notice that employees have no reasonable expectation of privacy when using government technology.
- If access of personal social media through government technology is permitted, notice that employee use of personal social media at work must be brief, not interfere with performance of the employee's duties or with the workplace, and not involve commercial, political or other prohibited activities.

Guidelines for elected official use of social media

Elected officials' use of the government's official social media or their personal or professional social media can raise many of the same risks just discussed with regard to employees. Elected officials who use the city's official social media should be subject to the same requirements as employees. (For open meetings purposes, discussed below, they may not want to use the official social media.) Many local governments have codes of ethics for elected officials, sometimes combined with the code for employees, which can be adopted by reference into the social media policy.

A risk that is different for elected officials is possible violation of the state's open meetings laws through the use of social media. A quorum of lawmakers holding a discussion about public business through social media may constitute a meeting that is subject to the open meetings law. This could happen through the official government social media, and some governments consequently prohibit elected officials from participating in their official social media. Equally problematic is elected officials' use of their own social media to communicate in their official capacity with members of the public. Informal communication with constituents is generally acceptable, but discussion of public business is risky, especially if it involves other elected officials. The dynamic nature of social media and the sheer volume of posts may make it difficult to track who is involved in the discussion and detect when the open meetings line has been crossed.

Another potential risk associated with elected official use of social media is use of government resources for political purposes. Elected officials are increasingly using social media for campaign purposes. Elected officials who use the same social media for communicating with constituents as they do to campaign risk violating the law against using government resources for political purposes.

To address these risks, consider including in the social media policy:

- Recognition that elected official use of social media to discuss public business may violate the open meetings law.
- A prohibition against elected officials using any social media (personal, professional or the government's official social media) to discuss public business.
- A requirement that a social media site used by an elected official to communicate with constituents include a link back to the city's official website for detailed information.
- A requirement that elected officials who use social media for campaigning establish separate social media for that purpose and not access that social media through government technology.

Public comment on the government's official social media

Some governments use their social media as a one-way communication tool to flow information to members of the public. Those governments disable comment features on their social media. Others view social media as an opportunity to receive information and feedback from the public and enhance operations. For example, members of the public might be encouraged to post a report of potholes, rather than calling.

The benefits of public comments have accompanying risks. A member of the public may post content that is inappropriate by being off-topic, defamatory, harassing, obscene or pornographic, criminal, or commercial. Or a citizen may just post an opinion that is critical about some aspect of the local government.

The risks of permitting public comments include:

- Failure to act on information reported by a member of the public resulting in harm to someone. If a member of the public posts a comment about a dangerous condition on public property, the government has notice. If it does not take action to address the dangerous condition and someone is injured or killed, a lawsuit may result.
- Although it would seem obvious that posts to social media are not private, members of the public who post may be disturbed if their comments are disclosed as public records under the state's open records law.

Other significant risks associated with public comment arise from what the government does (or does not do) to manage it. These include:

- Failing to monitor and remove inappropriate comment.
- Government employees responding inappropriately (in a harassing manner) to public comments.
- Violating the free speech rights of members of the public by removing comment based on the viewpoint or opinion expressed.

To address these risks, consider including in the social media policy:

- A public comment policy for posting on the social media site that does the following:
 - Identifies viewpoint neutral criteria that will be used to determine when a comment or link posted by a member of the public will be removed, which can include comments that are off-topic, obscene or pornographic, defamatory, harassing, commercial, criminal, political, or that violate the intellectual property rights of others.
 - Reserves the right to remove posts that violate the policy.
 - Gives notice that the comments are monitored only during business hours, and thus information conveyed after hours will not be received until the next business day.
 - Gives notice that comments are subject to disclosure as public records.
- Procedures and responsibility for monitoring of public comments and removal of inappropriate comments in accordance with the public comment policy.
- Procedures and responsibility for monitoring, responding to, and taking timely action to act upon information conveyed via public comments.

Conclusion

There are risks to undertaking any new activity, but social media is a powerful tool for local governments looking for new and cost-effective ways to engage their citizens. Just be sure to adopt social media with due consideration and planning. This means having clear objectives, knowing the target audience, selecting the right social media for the task, and taking the time to develop the right policy. Social media evolves quickly, so it is a good practice for the social media policy to remain platform neutral, and to review and revise it frequently to meet the changing environment.



Children's Online Privacy Protection Rule: A Six-Step Compliance Plan for Your Business

Tags: [Privacy and Security](#) [Children's Privacy](#)

Related Rules: [Children's Online Privacy Protection Rule \("COPPA"\)](#)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the [COPPA Rule](#), which spells out what operators of websites and online services must do to protect children's privacy and safety online. For example, if your company is covered by COPPA, you need to have certain information in your privacy policy and get parental consent before collecting some types of information from kids under 13.

Effective July 1, 2013, the FTC updated the COPPA Rule to reflect changes in technology. Violations can result in law enforcement actions, including civil penalties, so compliance counts.

Here's a step-by-step plan for determining if your company is covered by COPPA — and what to do to comply with the Rule.

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- [Step 4: Get Parents' Verifiable Consent Before Collecting Personal Information from Their Kids.](#)
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- [Step 6: Implement Reasonable Procedures to Protect the Security of Kids' Personal Information.](#)
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Step 1: Determine if Your Company is a Website or Online Service that Collects Personal Information from Kids Under 13.

COPPA doesn't apply to everyone operating a website or other online service. Put simply, COPPA applies to operators of websites and online services that collect personal information from kids under 13. Here's a more specific way of determining if COPPA applies to you. You must comply with COPPA if:

Your website or online service is directed to children under 13 and you collect personal information from them.

OR

Your website or online service is directed to children under 13 and you let others collect personal information from them.

OR

Your website or online service is directed to a general audience, but you have actual knowledge that you collect personal information from children under 13.

OR

Your company runs an ad network or plug-in, for example, and you have actual knowledge that you collect personal information from users of a website or service directed to children under 13.

To determine if you're covered by COPPA, look at how the Rule defines some key terms.

“Website or online service”

COPPA defines this term broadly. In addition to standard websites, examples of others covered by the Rule include:

- mobile apps that send or receive information online (like network-connected games, social networking apps, or apps that deliver behaviorally-targeted ads),
- internet-enabled gaming platforms,
- plug-ins,
- advertising networks,
- internet-enabled location-based services,
- voice-over internet protocol services,
- connected toys or other Internet of Things devices.

“Directed to children under 13”

The FTC looks at a variety of factors to see if a site or service is directed to children under 13, including the subject matter of the site or service, visual and audio content, the use of animated characters or other child-oriented activities and incentives, the age of models, the presence of child celebrities or celebrities who appeal to kids, ads on the site or service that are directed to children, and other reliable evidence about the age of the actual or intended audience. If your website doesn't target children as its primary audience, but is “directed to children under 13” based on those factors, you may choose to apply COPPA protections only to users under age 13. If that's what you decide to do, you must not collect personal information from any users without first collecting age information. For users who say they are under age 13, don't collect any personal information until you have obtained verifiable parental consent.

“Personal information”

Each of these is considered personal information under COPPA:

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from other links on your site won't do the trick.

To comply with COPPA, your privacy policy should be clear and easy to read. Don't add any unrelated or confusing information. Here's what your policy must include:

- A list of all operators collecting personal information. Name each third party operator, such as an advertising network or social network plug-in, that collects or maintains children's personal information through your site or service. For each, include a name and contact information (address, telephone number, and email address). If more than one is collecting information, it's okay to give contact information for only one as long as that company will respond to all inquiries from parents about your site or service's practices. Even so, you still have to list all third parties in your privacy policy.
- A description of the personal information collected and how it's used. Your policy must describe:
 - the types of personal information collected from children (for example, name, address, email address, hobbies, etc.);
 - how the personal information is collected — directly from the child or passively, say, through cookies;
 - how the personal information will be used (for example, for marketing to the child, notifying contest winners, or allowing the child to make information publicly available through a chat room); and
 - whether you disclose personal information collected from kids to third parties. If you do, your privacy policy must list the types of businesses you disclose information to (for example, ad networks) and how they use the information.
- A description of parental rights. Your privacy policy must tell parents:
 - that you won't require a child to disclose more information than is reasonably necessary to participate in an activity;
 - that they can review their child's personal information, direct you to delete it, and refuse to allow any further collection or use of the child's information;
 - that they can agree to the collection and use of their child's information, but still not allow disclosure to third parties unless that's part of the service (for example, social networking); and
 - the procedures to follow to exercise their rights.

Step 3: Notify Parents Directly About Your Information Practices Before Collecting Personal Information from Their Kids.

COPPA requires that you give parents "direct notice" of your information practices before collecting information from their kids. In addition, if you make a material change to the practices parents previously agreed to, you have to send an updated direct notice.

The notice should be clear and easy to read. Don't include any unrelated or confusing information. The notice must tell parents:

- that you collected their online contact information for the purpose of getting their consent;
- that you want to collect personal information from their child;
- that their consent is required for the collection, use, and disclosure of the

information;

- the specific personal information you want to collect and how it might be disclosed to others;
- a link to your online privacy policy;
- how the parent can give their consent; and
- that if the parent doesn't consent within a reasonable time, you'll delete the parent's online contact information from your records.

In certain circumstances, it's okay under COPPA to collect a narrow class of personal information without getting parental consent. But you may still have to give parents direct notice of your activities. (See the [chart at the end](#) for a list of those limited exceptions.)

Step 4: Get Parents' Verifiable Consent Before Collecting Personal Information from Their Kids.

Before collecting, using or disclosing personal information from a child, you must get their parent's verifiable consent. How do you get that? COPPA leaves it up to you, but it's important to choose a method reasonably designed in light of available technology to ensure that the person giving the consent is the child's parent. If you have actual knowledge that you're collecting personal information from a site or service that is directed to children, you may get consent directly or through the child-directed site or service.

Acceptable methods include having the parent:

- sign a consent form and send it back to you via fax, mail, or electronic scan;
- use a credit card, debit card, or other online payment system that provides notification of each separate transaction to the account holder;
- call a toll-free number staffed by trained personnel;
- connect to trained personnel via a video conference;
- provide a copy of a form of government issued ID that you check against a database, as long as you delete the identification from your records when you finish the verification process;
- [answer a series of knowledge-based challenge questions](#) that would be difficult for someone other than the parent to answer; or
- verify a picture of a driver's license or other photo ID submitted by the parent and then comparing that photo to a second photo submitted by the parent, [using facial recognition technology](#).

If you will use a child's personal information only for internal purposes and won't disclose it, you may use a method known as "email plus." Under that method, send an email to the parent and have them respond with their consent. Then you must send a confirmation to the parent via email, letter, or phone call. If you use email plus, you must let the parent know they can revoke their consent anytime.

You must give parents the option of allowing the collection and use of their child's personal information without agreeing to disclosing that information to third parties. If you make changes to the collection, use, or disclosure practices the parent already agreed to, you must send the parent a new notice and get their consent.

Check the chart for the narrow exceptions to the general rule that you must get parental consent before collecting personal information from kids. Even if you fall within an exception to the consent requirement, you still may have specific notice requirements.

Step 5: Honor Parents' Ongoing Rights with Respect to Personal Information Collected from Their Kids.

Even if parents have agreed that you may collect information from their kids, parents have ongoing rights — and you have continuing obligations.

If a parent asks, you must:

- give them a way to review the personal information collected from their child;
- give them a way to revoke their consent and refuse the further use or collection of personal information from their child; and
- delete their child's personal information.

Any time you're communicating with a parent about personal information already collected from their child, take reasonable steps to ensure you're dealing with the child's parent. At the same time, make sure the method you use to give parents access to information collected from their kids isn't unduly burdensome on the parent. Under COPPA, it may be okay to terminate a service to a child if the parent revokes consent, but only if the information at issue is reasonably necessary for the child's participation in that activity.

Step 6: Implement Reasonable Procedures to Protect the Security of Kids' Personal Information.

COPPA requires you to establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. Minimize what you collect in the first place. Take reasonable steps to release personal information only to service providers and third parties capable of maintaining its confidentiality, security, and integrity. Get assurances they'll live up to those responsibilities. Hold on to personal information only as long as is reasonably necessary for the purpose for which it was collected. Securely dispose of it once you no longer have a legitimate reason for retaining it.

Looking for more about the Children's Online Privacy Protection Rule? Visit the Children's Privacy page of the FTC's Business Center. For additional advice, read Complying with COPPA: Frequently Asked Questions. Visit consumer.ftc.gov for general information about protecting kids' privacy online. Email us at COPPAhotline@ftc.gov if you have other questions.

Chart: Limited Exceptions to COPPA's Verifiable Parental Consent Requirement

In general, you must get a parent's verifiable consent before collecting personal information from their child. But there are some limited exceptions to that requirement that allow you to collect information without parental consent. Keep in mind that the kind of information you may collect under each exception is narrow. You can't collect anything more. Also, if you collect information

under one of these exceptions, you can't use it or disclose it for any other purpose.

Reason you may collect information without parental consent	The kind of information you may collect	Other limits on how you may use the information	If you collect information under this exception, what you must tell parents in your direct notice
To get verifiable parental consent	<p>child's and</p> <p>parent's name and online contact information</p>	<p>You must delete</p> <p>their contact information if you don't get consent within a reasonable time.</p>	<p>You must:</p> <ul style="list-style-type: none"> • tell parents you collected their online contact information so you can obtain their consent; • tell them their consent is required for the collection, use or disclosure of personal information collected from the child, and that you won't collect, use or disclose any personal information from the child without the parent's consent; • describe the additional items of personal information you intend to collect from the child and other ways for the child to disclose personal information if the parent provides consent; • hyperlink to your privacy policy; • describe the

Reason you may collect information without parental consent	The kind of information you may collect	Other limits on how you may use the information	ways parents can provide information under this exception, what you must tell parents in your direct notice of collection, use or disclosure of personal information
			<p>information collected from the child; and</p> <ul style="list-style-type: none"> • tell parents that if they don't provide consent within a reasonable time, you will delete their online contact information from your records.
To give voluntary notice to a parent about their child's participation on a site or service that doesn't collect personal information	parent's online contact information		<p>You must:</p> <ul style="list-style-type: none"> • tell parents you collected their online contact information to let them know about their child's activities on a site or service that doesn't collect personal information; • tell them their online contact information won't be used for any other purpose; • tell them they may refuse their child's participation and require that you delete their contact information; and • hyperlink to your privacy policy.

Reason you may collect To respond directly to parents' specific one-time request (for example, if the child wants to enter a contest)	The kind of information child's you may online collect contact information	You can't use other limits on the information how you may to contact the use the child again and information you must delete it after you	If you collect information under this exception, what you must tell No direct notice is required. direct notice
		respond to the request.	

To respond directly more than once to a child's specific request (for example, if the child wants to receive a newsletter)	child's and parent's online contact information	You can't combine this information with any other information collected from the child.	<p>You must:</p> <ul style="list-style-type: none"> • tell parents you collected their online contact information to let them know their child has asked for multiple online communications; • tell parents you collected their child's online contact information to provide the multiple communications they asked for; • tell parents the online contact information won't be used for any other purpose and won't be disclosed or combined with other information; • tell parents that if they don't opt out, you may use the child's online contact information for that purpose; and
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	The kind of	Other limits on	<ul style="list-style-type: none"> • hyperlink to your privacy policy.
Reason you may collect information without parental consent	information you may collect	how you may use the information	information under this exception, what you must tell parents in your direct notice

To protect a child's safety	child's and parent's name and online contact information		You must: <ul style="list-style-type: none"> • tell parents you collected the names and contact information to protect a child's safety; • tell parents the information won't be used or disclosed for any other purpose; • tell parents they may refuse to permit the use of the contact information and require you to delete it; and • hyperlink to your privacy policy
To protect the security or integrity of your site or service, to take precautions against liability, to respond to judicial process, or — as permitted by law — to provide information to law enforcement	child's name and online contact information		No direct notice is required.

Reason you may collect information without parental consent	The kind of information you may collect	Other limits on how you may use the information	If you collect information under this exception, what you must tell parents in your direct notice
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<p>To provide support for internal operations of your site or service.</p> <p>This includes:</p> <ul style="list-style-type: none"> maintaining or analyzing the functioning of the site, performing network communications, authenticating users of the site or personalizing content, serving contextual ads or frequency capping, protecting the security or integrity of the user or the site, legal or regulatory compliance, or fulfilling a child's request under the one-time contact or multiple contact exceptions. 	<p>persistent identifier</p>	<p>You can't use the information to contact a specific person, including through behavioral advertising, to amass a profile on a specific person, or for any other purpose.</p> <p>You can't use this exception if you collect personal information other than a persistent identifier.</p>	<p>No direct notice is required.</p>
<p>If you have actual knowledge that a person's information was collected through a child-directed site, but their previous registration indicates the person is 13 or over</p> <p>This exception applies only if:</p> <ul style="list-style-type: none"> you collect only a persistent identifier and no other personal information; the person affirmatively interacts with your site or 	<p>persistent identifier</p>	<p>You can't use this exception if you collect information other than a persistent identifier.</p>	<p>No direct notice is required.</p>

service to trigger the collection; and Reason you may collect information without parental consent • you have already conducted an age-screen of the person indicating he or she is 13 or over.	The kind of information you may collect	Other limits on how you may use the information	If you collect information under this exception, what you must tell parents in your direct notice
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For More Information

The FTC works for the consumer to prevent fraudulent, deceptive, and unfair practices in the marketplace and to provide information to businesses to help them comply with the law. To file a complaint, visit ftc.gov or call toll-free, 1-877-FTC-HELP (1-877-382-4357); TTY: 1-866-653-4261. Watch a video, [How to File a Complaint](#), to learn more. The FTC enters consumer complaints into the [Consumer Sentinel Network](#), a secure online database and investigative tool used by hundreds of civil and criminal law enforcement agencies in the U.S. and abroad.

June 2017

Your opportunity to comment

The National Small Business Ombudsman and 10 Regional Fairness Boards collect comments from small businesses about federal compliance and enforcement activities. Each year, the Ombudsman evaluates the conduct of these activities and rates each agency's responsiveness to small businesses. Small businesses can comment to the Ombudsman without fear of reprisal. To comment, call toll-free 1-888-REGFAIR (1-888-734-3247) or go to www.sba.gov/ombudsman.