



POLICY 2026-01 (VILLAGE SOCIAL MEDIA POLICY)

PURPOSE: The purpose is to establish guidelines for the formation and use by the Village of social media sites as a means of conveying information to the public about the Village’s mission, meetings, activities, and current issues. The Village has an overriding interest and expectation in protecting the integrity of the information posted on its social media sites and the content that is attributed to the Village and its officials.

A. INTENT

The Village of Hobart (“the Village”) recognizes that the internet provides unique opportunities to participate in interactive discussions and share information on various topics. To reduce risks, avert distraction and loss of productivity, and to ensure all IT resources are being used appropriately, the Village expects and requires its Employees to adhere to the following rules and guidelines regarding such social media use. This policy governs the use, administration, management, monitoring, and retention of social media and social media content, consistent with state, federal, and local laws and regulations, and in line with the Village’s mission, vision, and core values.

B. DEFINITIONS

The definitions related to this policy include:

EMPLOYEE

Any person who performs services for wages or salary under a contract of employment, express or implied, for the Village.

ELECTED OFFICIAL

Any person who has been chosen by election to the Village Board, or any other elected Village body, or has been appointed to fill a vacancy on the same.

FORUM

An online platform where users can post comments, information, images, or other electronic content, either anonymously or with personal identity.

LIMITED PUBLIC FORUM

A forum that is intentionally restricted to a particularized subject matter or content such that the Village can control external posts to be specific to that limited use.

LINK OR HYPERLINK

A hypertext file or document which connects a user to another location or file, typically activated by clicking on a highlighted word or image on the screen.

MALWARE

Software that is intended to damage or disable computers and computer systems or electronic communication devices.

PERSONAL IDENTIFICATION INFORMATION

Information and documents as defined under Wisconsin Statute Sections 943.201(1)(a) and(b) (Unauthorized use of an individual's personal identifying information or documents).

PERSONAL SOCIAL MEDIA ACCOUNTS

Any blog, chat room, forum, social media site and/or website created or configured by an individual or entity for individual, social, or entertainment purposes which are wholly separate and distinct from any Village-Related Content or Village Social Media Sites.

POSTS

Comments, information, images, or other electronic content left by a user/person on a blog, social media site, or other website.

PUBLIC USER

Any person or entity utilizing a personal social media account that is not acting in their capacity as the Social Page Administrator and/or their designee.

PUBLISH

Comments, information, images, or other electronic content that is made or disseminated via social media, websites, or other publicly open electronic forum.

SITE OPERATOR

The entities that manage or control each social media platform (e.g. Facebook, Google, Instagram, LinkedIn, etc.)

SOCIAL MEDIA

Internet technologies that facilitate and promote interactive communication, participation, and collaboration. Examples of social media include, but are not limited to, the web sites and applications Facebook, LinkedIn, X, Instagram, Tumblr, Pinterest, and YouTube, and the interactive tools and functions they provide to users.

SOCIAL MEDIA CONTENT

Any messages, materials, documents, photographs, videos, graphics, and other information that is created, posted, distributed, transmitted, or published using Social Media internet sites or Social Media tools.

SOCIAL PAGE ADMINISTRATOR

The Village employee designated by the Village Board with oversight of Village Social Media Sites with authority to create, use, publish, post, administer, manage, monitor, and/or retention of Social Media, Social Media tools or web sites, and/or Social Media Content, in the name of or on behalf of the Village. The Social Page Administrator has the authority to authorize one (1) designee, who shall all have the same authority as the Social Page Administrator.

VILLAGE-RELATED CONTENT

Any messages, materials, documents, media, information, or similar uses of social media that is published or otherwise made public and relates to an official function or policy of the Village, Authorized User, or Village Officer.

VILLAGE SOCIAL MEDIA SITES

Social media sites, pages, and/or accounts used for the purpose of posting Village-Related Content, and over which the Village or Social Page Administrator or Designee has control over all posting, except for advertisements or hyperlinks by the social media site's owners, vendors, or partners. Village Social Media Sites shall supplement, and not replace, the Village's required notices and standard methods of communication. All official Village presence on social media sites is an extension of the Village's existing information systems and networks.

VISITOR

Any person or entity who is not acting in the name of or on behalf of the Village or any Village officers, departments, boards, commissions, committees and authorities, volunteers and employees, that uses, posts, views, or otherwise utilizes a Village Social Media Site.

VOLUNTEER

A person recognized and authorized by the Village to perform services for the Village without promise, expectation, or receipt of compensation for services rendered. The receipt of reimbursement for authorized expenses does not constitute compensation as used herein.

C. OWNERSHIP OF VILLAGE SOCIAL MEDIA SITES, DATA, AND INFORMATION

1. OWNERSHIP. Any and all social media and other online accounts and profiles created or used on behalf of the Village or otherwise managed or maintained by a Social Page Administrator or Designee for the purpose of promoting or marketing the Village or Village-Related Content. The Village owns all Village Social Media Sites regardless of the employee who opens the account or uses, manages, or accesses it. Village Social Media Sites include any and all log-in information, data, passwords, trademarks, and content related to the profile or account, including all followers, subscribers, and contacts.

2. NON-OWNERSHIP. Village Social Media Sites do not include any social media accounts or profiles that are created or used by an employee exclusively for an employee's own personal use. Individuals shall not create, develop, or maintain any Village Social Media Sites without following this Policy's Authorization and Access process. All approved Village Social Media Sites shall, where possible, be registered, in whole or in part, using the Village's name and contact information. After registration, the log-in and password information for each of the Village's Social Media Sites shall be kept by the Social Page Administrator and/or their designee and Village Clerk and any password changes must be recorded by the next business day with Village Clerk. The Social Page Administrator will ensure that a minimum of two administrators (including themselves) with full management rights and appointed by the Village are in place on each Village Social Media Site at all times for security and access purposes.

3. If you have any questions about creating or managing a social media account on behalf of the Village, please review the Village's Social Media Policy in its entirety for guidelines and restrictions related to the creation, development, and maintenance of any Village Social Media Site and all business use of social media or contact the Village Administrator.

4. Upon the Village's request at any time during the course of employment or immediately upon and after a Social Page Administrator and/or their designee's separation of employment from the Village for any reason, they agree to cease accessing, using, updating, and modifying the Village Social Media Sites. The current Social Page Administrator should change passwords or remove page access within 48 hours following termination of their predecessor or designee. Upon the Social Page Administrator and/or their designee's separation of employment from the Village for any reason, the Village will retain ownership and control of all Village Social Media Sites created or used during the course of their employment, including all related data and information. Prior to their separation of employment, they agree to provide to the Village

the log-in information, including usernames and passwords when they exist, for each Village Social Media Site that they created, used, or managed. The Social Page Administrator and/or their designee also agree to assist the Village, both prior to and after their employment (as may be necessary), with the transition and maintenance of each Village Social Media Site created or used by them during the course of their employment, including providing all information that may be necessary to ensure that the Village is able to access and control the Village Social Media Sites. Administrative accounts shall be tied to a Village email account where possible.

D. GENERAL PRACTICES

1. Village Social Media Sites shall contain the following information in a prominent place on the site:
 - (a) Clearly state that such sites are maintained by the Village and that the sites comply with the Village's Social Media Policy. This will contain a link to the policy which will be on the Village's website.
 - (b) The comment policy for the site will be listed.
 - (c) Stated purpose of the page/site.
 - (d) Notification that violations of comment policy will result in blocking the user
 - (e) Official Contact (i.e., the Social Page Administrator)
2. Village Social Media Sites shall link back to the Village's official website for forms, documents, online services, and other information necessary to conduct business with the Village.
3. Village Social Media Sites are considered Limited Public Forums that the Village may disable all comments if possible. If comments are allowed or unable to be disabled, the Village may moderate comments according to this Policy's User Responsibilities.
4. The Village's Social Media Policy shall be displayed to users and made available by hyperlink.

E. AUTHORIZATION AND ACCESS

1. In order for any Village department to establish a Village Social Media Site, a request must first be provided to the Village Administrator and approved by the Village Board. Requests for Village Social Media Sites must include a plan to utilize the site and assign a Social Page Administrator and their designees to regularly update and periodically monitor the sites.
2. To ensure consistency of Village-related messages, the Social Page Administrator and/or their designee are the sole Village Employees authorized to post to their approved Village Social Media Site(s). The Social Page Administrator and/or their designee must also ensure that any and all contractors, vendors, or agents of the Village who may represent the Village in postings to social media sites will comply with all policies, rules, and requirements regarding such actions.
3. The Village reserves the right to deny access to post or publish content on Village's Social Media Sites to any Employee or representative of the Village who violates this Policy. Any reference in this document to "Employee" or "Village employee" shall be considered to include any contractor, vendor, or agent working for or representing the Village but not in the Village's employment.

4. Notwithstanding other provisions of this Policy, the Policy does not intend in any way to limit or restrict the ability of Village Employees to speak as private citizens on matters relating to Village business. Village Employees may post comments, questions, or opinions on social media sites, including any Village Social Media Sites, so long as they make clear that they are acting as private citizens and that their statements in no way represent the official position of the Village.

F. TRAINING

The Social Page Administrator and/or their designee, as well as all employees, representatives and Elected Officials of the Village, will receive training that, at a minimum, addresses legal issues concerning the appropriate use of social media sites, as well as privacy, civil rights, dissemination and retention of information posted.

G. OFFICIAL AND ACCEPTABLE USE

1. Only information that pertains to Village-Related Content or operations shall be posted to Village Social Media Sites for informational use only. Such examples include but are not limited to:

- (a) Announcements.
- (b) Investigative requests for information.
- (c) Requests that ask the community to engage in projects that are relevant to the Village's mission.
- (d) Traffic information.
- (e) Press releases.
- (f) Recruitment of personnel.
- (g) Information shared for educational purposes surrounding local government.

2. The Village will not allow third party content on any Village Social Media Site unless it pertains to Village business or operations.

3. Information posted, when possible and appropriate, should include a link to the Village of Hobart website (www.hobartwi.gov) or a subdomain thereof. When appropriate, posts may include relevant contact information.

4. Village Social Media Sites are not constantly monitored. The Social Page Administrator and/or their designee may monitor sites when they are posting or updating information. The Village may take action consistent with this policy if it's made aware of posts, comments, and other content that violate this Policy.

5. The Social Page Administrator and/or their designee must never post personal information to a Village's Social Media Site. Instead, the Social Page Administrator and/or their designee, or any Village employee who wishes to post personal information on social media sites must maintain separate personal pages on sites such as, but not limited to, Facebook, LinkedIn, X, Instagram, Tumblr, Pinterest, and YouTube. Personal messages and the like received on an "official" page must be referred to the owner's personal page. Messages relating to Village business sent to a personal page must be forwarded to an official Village page.

6. The same principles and policies that govern interactions with the public generally apply also to social media. The Social Page Administrator and/or their designee must, at all times, conduct themselves in accordance with all state and local laws and all existing Village policies. The Village requires the Social Page Administrator and/or their designee to adhere to and follow all existing work rules, the Village's Code of Ethics, and local, state, and federal laws.

7. Elected Officials hold unique positions in the operation of the Village government. By virtue of their position and authority, Elected Officials have the potential to generate records anytime the Elected Official creates content or otherwise posts or publishes content related to a Village function or related to the authority of the Elected Official. Regardless of the intent of the Elected Official, the Village may incur liability for Elected Officials actions on social media and as such, Elected Officials are strongly encouraged to use proper discretion and compliance with this all policy and all related policies involving community engagement. Elected Officials are the record custodians for their content posted and shall adhere to all local, state, and federal laws.

8. The Social Page Administrator and/or their designee representing the Village on social media sites must act responsibly in the posting of material and in their online demeanor. The Social Page Administrator and/or their designee must respond honestly to appropriate queries and should not become hostile or argumentative. They should always exercise good judgment regarding the content and potential need for confidentiality (omitting addresses, phone numbers, and other personal data) or posted information.

9. The Social Page Administrator and/or their designee may never use their access as Village representatives to social media sites for personal gain or to promote endeavors of relatives, friends, or associates. The Social Page Administrator and/or their designee may not post information on Village-sponsored social media sites that is protected under copyright, trade secret, or is proprietary in nature without the express written permission from the lawful holder of the information, prior to posting on a Village-sponsored site. This applies to elected officials as well. Many social networking sites allow the installation of extra applications, programs, and skins to enhance the experience. Many of these extra applications contain Trojans, viruses, and other malware. Never install any extra applications on any social networking site.

10. If content is posted to someone else's social media website using an associated Village identity, the content is considered a public record. Village-hosted social media pages/websites and all content on those pages are public records. The Social Page Administrator and/or their designee must develop a method to record this public record information in a way that allows them to respond legally to public record requests.

11. The Social Page Administrator and/or their designee may spend funds, if provided in the annual Budget, on advertisements or features designed to increase the reach of a Social Media Site or post from funds budgeted for marketing or advertising.

H. USER RESPONSIBILITIES

1. All users of Village Social Media Sites, including any Visitors, Public Users, Employees, and Social Page Administrators or designees, are restricted from posting or publishing content including but not limited to:

(a) Any abusive, discriminatory, inflammatory or sexually explicit materials, depictions, or content. This includes content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status in regard to public assistance, national origin, mental or physical disability, or sexual orientation, or any other legally protected status.

(b) Any information violating individual rights, including confidentiality and/or privacy rights and those provided under state, federal or local laws.

(c) Any information that could compromise the safety and security of Village operations, Village Employees, members of the Village, victims, suspects, or the public.

(d) Any content that advertises third party marketing materials or commercial interests not otherwise supported or consistent with Village-Related Content.

(e) Any content containing language or content that is threatening, obscene, violent, abusive, pornographic, or otherwise illegal.

(g) Not releasable under public records laws or that may tend to compromise the security of the Village, its investigations, networks, or information systems.

(h) Unlawfully defame or attack an individual or group.

(i) Support or oppose a political campaign.

(j) Violate any existing copyrights, trade secrets, or legal ownerships.

(k) Contain links to websites that are intended to defraud, defame, or victimize the public or any financial, commercial, or non-governmental agency.

(l) Content that is unrelated to the Limited Public Forum

2. The Village reserves the right to remove comments and/or materials solely at its discretion if the Village deems those comments and/or materials: violate any part of this policy, or local, state, or federal law.

3. Any content removed based on these guidelines must be retained - including the time, date, identity of the poster, identity of the staff who removed it, and the reason for the removal.

I. LEGAL REQUIREMENTS

1. Public records laws of the State of Wisconsin and local ordinances may require retention of any information, materials, and/or discussions on social media sites that involve Village Employees and Elected Officials and relate to official Village business. The Social Page Administrator and/or their designee will be responsible for ensuring proper retention of content posted to social media sites.

2. For purposes of complying fully with existing laws, retention of social media content as public records would likely include any comments, queries, information, or materials submitted by end users, including under certain circumstances, personal information submitted voluntarily such as the user's name and/or address. The Social Page Administrator and/or their designee will retain these records in an accessible and usable format that preserves the integrity of the original records for the period designated by appropriate records retention schedules.

3. The Village may utilize a third-party archiving service to comply with applicable public records law and fulfill record retention requirements.

4. Communication among members of governmental bodies using social media may constitute a “meeting” under the Wisconsin Open Meetings Law. For this reason, members of these bodies are strongly discouraged from interactions with other members on social media sites.

5. Various social media sites adhere to their own policies regarding the privacy of site users. The Village makes no claim to protect or preserve the privacy of users who interact with employees or representatives of the Village via these sites beyond those protections which the site owner provides. Further, the Village retains the right to review all information or materials written or contributed by users on Village Social Media Sites, therefore, users should have no expectation of privacy when posting to Village Social Media Sites.

6. The content of all communications posted by the Social Page Administrator and/or their designee on Village Social Media Sites is the sole property of the Village. Unless prohibited or otherwise provided for by the terms of service enforced by social media sites used by the Village, postings made by other users may also be considered Village property.

7. Violation of this policy by any Village employee may result in discipline up to and including discharge.

8. Visitors should be aware that the information made available by the Village on social media sites may not be timely, accurate or complete. Any communication from or to the Village through these sites will not be considered legal or official notice for any purpose.

9. The Village reserves the right to revise or modify this Policy at any time, without prior notice.

J. PUBLIC USERS

1. Village Social Media Sites are considered Limited Public Forums accounts.

2. If interactive communications are permitted on Village Social Media Sites, the terms of use for visitors to the social media page will be posted prominently on the Village Social Media Site page, unless prohibited by the terms of use governing the social media account and the site operator.

3. Each discussion or thread with interactive communication capabilities must have a specific and declared topic or description of the topic which may be addressed by users in the comments or discussion section. Posts may be removed if they are not directly related to those topics or are determined to be an unacceptable use. See User Responsibilities of this Policy.

4. Visitors to the Village’s Social Media Sites must comply with the terms of use and privacy policies of the site operator and are subject to the site operator’s practices regarding the collection and retention of passive information (e.g. cookies) and other information from and about visitors.

5. All postings or publications on the Village’s Social Media Sites will be retained by the Village, regardless of whether the content is posted by a visitor, public user, or Social Page Administrator, as required by applicable law, Policy and/or procedure.

6. Content may be subject to public records and disclosure laws, as well as discovery in litigation.

7. Visitors to any of the Village’s Social Media Site pages should have no expectation of privacy or confidentiality with respect to any content they post or publish to the site, and the Village has no responsibility for maintaining any such privacy or confidentiality.

8. Content published by a member of the public on any Village Social Media Site is the opinion of the commenter or poster only, and publication of a comment does not imply any endorsement or agreement by the Village, nor do such comments necessarily reflect the opinions or policies of the Village.

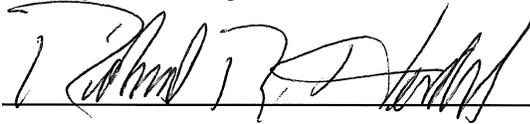
9. Communications or publications that are unacceptable uses, as defined in User Responsibilities Section of this policy, may be removed by the Social Page Administrator and/or their designee and documented by them of why the post was removed. Any content removed based on these guidelines must be retained - including the time, date, identity of the poster, identity of the staff who removed it, and the reason for the removal.

K. COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS

All of the Village's other policies that might apply to social media use remain in full force and effect. Employees should always adhere to them when using social media. Social media should never be used in a way that violates any other Village policies or employee obligations. If your social media activity violates any of the Village's policies in another forum, it will also violate them in an online forum. Employees who violate the Village's policies may be subject to disciplinary action.

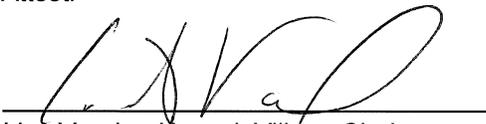
This policy shall take effect immediately and supersedes Policy 2023-06 (Social Media Policy).

This policy has been approved by the Board of Trustees of the Village of Hobart, Brown County, Wisconsin, at a regular meeting of the Board, held on January 20, 2026.



Richard Heidel, President, Hobart Village Board

Attest:



Lisa Vanden Heuvel, Village Clerk



Aaron Kramer, Village Administrator

