

Leading With Respect Handguides

AMO's Handguide 6
Using Social Media and
Online Platforms

6



Association of
Municipalities
of Ontario

AMO's Leading With Respect Handguides provide practical resources, tips, and tools that elected officials and senior staff can adapt, rebrand, and use to foster civility and respect in municipal governance across Ontario.

There are eight guides in the series.

1. An Introduction to AMO's Leading With Respect Handguides
2. Responding to Constituents
3. Chairing Meetings Effectively
4. Holding Public Meetings
5. Fostering Civility at the Council Table
6. **Using Social Media and Online Platforms**
7. Self-Care for Municipal Leaders and Staff
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6.0 Using Social Media and Online Platforms

Social media is now a common venue for civic communication, but it is not a neutral or cost-free tool for municipalities. While these platforms can help reach residents quickly, they also introduce legal, operational, and democratic risks that require careful judgement about when and how they are used.

When used appropriately, social media can support municipal work by sharing information about council decisions and local priorities. It can be used to set the record straight when misinformation and disinformation is swirling. The vacuum left by the retreat of news media and journalism at the local level means that social media is the only way for council and staff to disseminate information to residents in a timely manner.

Different platforms serve different purposes, and municipalities can choose channels based on their communication objectives and the audiences they aim to reach:

Facebook is a common starting point for community engagement and institutional updates;

X (formerly Twitter) is better suited for real-time information, event coverage, and responding to public inquiries;

TikTok & Instagram can be effective for reaching younger residents through visual content;

AI tools such as Grok on X have been the subject of recent controversy and underscore the importance of ongoing risk assessment, content moderation, clear account controls, and careful oversight of automated or algorithmic features.

At the same time, online behaviour shapes offline civic life. Harassment and abuse affect who feels able to participate, who is willing to engage publicly, and who considers running for office or working in municipal roles. Poorly managed platforms can narrow participation and weaken public trust. The informal nature of social media also creates legal and ethical exposure: accounts and posts are often perceived as extensions of official authority, creating risks related to conduct, privacy, and the use of public resources.

6.1 Moderation Principles for Online Forums and When to Disengage

Without clear moderation standards, online engagement can quickly expose municipalities to legal risk, privacy and data breaches, and staff harm. The principles below provide a defensible baseline for managing these risks while preserving open civic discussion.

① Publish Your "House Rules"

You cannot enforce rules you have not posted. Before moderating content, publish a Social Media Community Policy or Terms of Use and link to it prominently. This policy provides the authority to hide or remove content. At minimum, prohibited content should include:

- Discrimination or harassment
- Threats, illegal activity, or copyright violations
- Spam or commercial solicitation
- Demonstrably false information related to elections, public health, or safety

② Enforce Behaviour, Not Opinion

(Viewpoint Neutrality)

Moderation must be viewpoint-neutral. Distinguish between **what** is being said and **how** it is expressed. Criticism of council or staff is protected political speech. Abusive, threatening, or discriminatory conduct is not. Removing content based on disagreement rather than behaviour may violate Charter protections.

3 Protect Privacy

(No Casework in Public)

Social media is not a secure channel. Public threads are inappropriate for handling service requests or sharing personal information.

- Remove posts containing personal or identifying details
- Redirect residents to a secure channel, explaining the privacy rationale

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Use a Graduated Response

Apply the least intrusive intervention needed:

- Hide spam or irrelevant content
- Preemptively disable comments on certain hot-button topics
- Delete material that clearly violates posted rules (retain records)
- Block only after repeated violations or credible threats

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Documenting Evidence for Potential Legal Action

If legal action may be pursued, it is important to preserve thorough and accurate records of all relevant interactions:

Screenshots: Capture clear images of all messages, comments, posts, or images. Ensure each screenshot shows timestamps and the sender's username or profile URL.

Detailed Log: Maintain a chronological record of incidents, noting the date, time, platform, and a concise description of what occurred.

→ Note that some may view any of these actions as preventing dissent or infringing on free speech, and escalation is possible; seek legal advice on an appropriate policy when uncertain.

Moderation Analogy:

A municipal page is like a community notice board. Residents may criticize municipal decisions, but they may not deface the "board", post threats, or use it for commercial advertising. Moderation removes harmful conduct—not unpopular opinions.

Disengagement Decision Tree

Engaging online does not mean you are required to suffer abuse. "**Don't feed the trolls**" is a core tenet of digital survival. Use this decision tree to determine when to engage, when to ignore, and when to block.



Step 3
Is the comment designed to provoke or disrupt?
(off-topic, repetitive, insincere, inflammatory)

Yes → Do not engage.

Hide spam or repetitive posts if needed to keep the thread usable.

No → Proceed to Step 4

Step 4
Does the comment contain abuse or threats?

(hate speech, threats of violence, sexual content, defamatory attacks)

Yes →

- 1. Record:** Screenshot for your files.
- 2. Remove or Block:** Apply your posted rules.
- 3. Report:** Flag to the platform; escalate threats to police or the integrity commissioner as required.

No → Reassess or seek staff advice before responding.

Pulse check:

When in doubt, ask: Will this response advance service—or escalate the conflict?
If engagement adds heat rather than clarity, disengagement is the appropriate professional choice.

6.2 Personal vs. Official Account Guidance

One of the most common pitfalls for elected officials and senior staff is the blurring of lines between a "personal" opinion and an "official" statement. In the municipal context, how you set up and use your account determines your liability, your ability to moderate comments, and your obligations under your Code of Conduct and privacy legislation (such as the Municipal Freedom of Information and Protection of Privacy Act).

The "Official" Test

According to the Toronto Integrity Commissioner, an account is likely considered official (and therefore subject to Council Codes of Conduct and records retention rules) if it meets any of the following criteria:

Identity: You use your official title (e.g., "Councillor," "Mayor," "CAO") in the handle, username, or profile description.

Resources: The account is managed using municipal devices (computers, smartphones) or maintained by municipal staff or volunteers.

Contact Info: You list your city hall or municipal email address/phone number for registration or contact.

Branding: You use the municipal logo or other corporate imagery.

Promotion: The account is linked from the municipality's official website or your official constituency site.

The "Personal" Test

To maintain a truly personal account where you retain greater control over content and blocking, you must strictly separate it from your office.

No Official Business: You cannot use the account to make official announcements, solicit public input on municipal decisions, or issue orders.

Clear Disclaimers: Clearly state that views are your own.

No Municipal Resources: You cannot engage in this account during working hours or using municipal hardware.

The "Hybrid" Trap:

Many officials attempt to run "hybrid" accounts. Be warned: if you mix personal family photos with official policy announcements, the account will likely be treated as official by integrity commissioners and the courts. If you use your title, you are trading on the influence of your office, and the Code of Conduct applies.

Election Year Scrubbing

During an election period, the distinction becomes critical to avoid using municipal resources for campaigning. You generally have two options:

- 1. Separate Accounts:** Maintain a distinct "Re-Elect" account funded entirely by your campaign. This is the safest approach.
- 2. Conversion:** If you use your official account for campaigning, you must "scrub" it during the election period. This involves removing references to your official title, removing municipal logos, and ensuring no staff or city devices are used to update it.

6.3 Policies to Consider for Online Platforms

To professionalize your digital governance and protect against liability, your municipality should consider adopting or updating three specific types of policy documents. These examples are drawn from established Canadian municipal frameworks.

External "House Rules" (Community Guidelines)

You need a public-facing document linked in your bio or "About" section that explicitly grants you the licence to moderate. Without this, blocking users may be seen as arbitrary or discriminatory.

Prohibited Content: Clearly list what is not allowed. This can include: insulting, threatening, or harassing language; promotion of illegal activity; spam; and content that violates another person's privacy.

Right to Remove: State clearly: "We reserve the right to hide and/or remove content that does not abide by these Guidelines".

Disclaimer on Endorsements: State that "following," "liking," or "sharing" content does not constitute an official endorsement of the views expressed.

Internal Elected Official Guidance

(Code of Conduct application)

This internal policy clarifies how the Code of Conduct applies to digital actions, specifically distinguishing between "Official" and "Personal/Election" accounts to prevent the misuse of municipal resources.

The "Official" Definition: Define an account as official if it uses a corporate email for registration, uses the municipal logo, or is maintained by municipal staff/devices.

Election Year Protocol: Mandate that during an election period, official accounts must either be "scrubbed" of municipal branding and titles or kept distinct from new campaign accounts. No municipal resources (computers, staff time) can be used for campaign content.

In-Camera Confidentiality: Explicitly prohibit the use of social media during in-camera meetings to prevent inadvertent disclosure of confidential information or real-time broadcasting of privileged proceedings.

Service Level Expectations

(Terms of Use)

Manage public expectations regarding response times and service requests to protect staff workflow and resident privacy.

Not for Formal Complaints: State clearly that social media is not the venue for official complaints or complex service requests because platforms are not confidential. Direct these to a secure web form, email, or phone number.

Availability: Define monitoring hours (e.g., "Mon-Fri, 9am-5pm"). Explicitly state that accounts are not monitored 24/7 to avoid liability during emergencies.

Privacy Warning: Remind users that social media is a public record. Warn them never to post personal details (addresses, file numbers) on the public feed.

Learn More

Organization	Links
Office of the Integrity Commissioner Toronto: <u>Use of Social Media by Council Members (PDF)</u>	toronto.ca
<u>Ombudsman Toronto</u> <u>Social Media Policy (PDF)</u>	uwaterloo.ca
<u>Ombudsman Ontario</u> <u>Approach to Social Media Engagement</u>	ombudsman.on.ca
<u>City of Victoria</u> <u>Forum Etiquette & Moderation</u>	engage.victoria.ca
<u>City of Markham</u> <u>Social Media Community Guidelines</u>	markham.ca
<u>City of Peterborough</u> <u>Social Media Policy (PDF)</u>	peterborough.ca
<u>Samara Centre for Democracy</u> <u>The 2023 Toronto Mayoral By-election Report</u>	samaracentre.ca
<u>UK Parliament</u> <u>Corporate Use of Social Networking Sites (PDF)</u>	parliament.uk
<u>UK Department for Work & Pensions</u> <u>Guidance on Social Media Policy</u>	gov.uk

Organization	Links
UK Society of Local Council Clerks <u>Civility and Respect Guide to Social Media</u>	<u>slcc.co.uk</u>
UK City of London <u>Employee Handbook: Social Media Policy (PDF)</u>	<u>democracy.cityoflondon.gov.uk</u>
UK City of London <u>Social Media FAQs (PDF)</u>	<u>democracy.cityoflondon.gov.uk</u>
USA Office of the Chief Technology Officer <u>Social Media Access and Use Policy</u>	<u>octo.dc.gov</u>
USA Office of Personnel Management <u>Social Media Policy (PDF)</u>	<u>opm.gov</u>
USA Association of Washington Cities <u>Guidelines for Elected and Appointed Officials Using Social Media</u>	<u>wacities.org</u>
USA New York State <u>Social Media Policy</u>	<u>ny.gov</u>
USA Election Assistance Commission <u>Social Media Comment Policy</u>	<u>eac.gov</u>
Knight First Amendment Institute at Columbia University <u>Social Media for Public Officials 2.0 Factsheet</u>	<u>knightcolumbia.org</u>



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