

**USE OF CITY SOCIAL MEDIA**

**DATE:** July 2, 2013

**POLICY NO.:**

**REVISION NO.:**

**APPROVED:** 

**DEPARTMENT:** Administration

**I. PURPOSE**

The City of Signal Hill has a need to maintain consistent and accurate communication with its various constituencies and thus an overriding interest in deciding who may speak and what is spoken on its behalf. This policy's purpose is to aid in meeting the City's goals by establishing procedures for the use of social media in accordance with existing City policies and directives. This policy is meant to provide guidance to City departments and City employees who post information or create pages on social media sites on behalf of the City.

This policy applies to employees, contractors, volunteers, and any other person or entity participating in social media on behalf of the City of Signal Hill as part of their duties. All preexisting and proposed social media websites and online community accounts created by City employees during the course and scope of their employment are subject to this policy.

**II. DISCUSSION**

Social media sites provide the City with a new form of communication tool that provides the ability to disseminate information to members of the community wherever they are. However, understanding how to take advantage of these new communication tools in the context of government is complex.

Social media networking venues enable the City to choose to operate an interactive site and invite responsive posts by readers or to use the sites as a one-way communication tool to disseminate information for the benefit of the public. The City has evaluated the pros and cons of operating an interactive social media site and believes utilizing one-way communications best serves the City's capability to manage its social media sites while providing a new source for information to the community. Use of such sites by City departments shall be for official City purposes only.

This policy is meant to help employees who use social media on the City's behalf to minimize the risks while maximizing the benefits of these developing technologies. In the event an employee violates civil and criminal laws, that employee may be personally liable for the content placed on the social media site.

### III. GOALS OF SOCIAL MEDIA

- A. Provide more City information to a greater number of Signal Hill residents and businesses
- B. Enhance current communication efforts
- C. Serve as a source to build awareness and interest
- D. Provide rapid disbursement of emergency information
- E. Draw the public to the City website
- F. Draw the public to City services and events
- G. Disseminate timely, relevant information that is clear and concise, thus avoiding overwhelming Signal Hill followers with frivolous information

### IV. POLICY

This policy is the City's official position governing use of social media. The City has an overriding interest and expectation in deciding what is announced or spoken on behalf of the City on social media sites. This policy establishes internal procedures for the use of social media.

- A. The City's official website, [www.Cityofsignalhill.org](http://www.Cityofsignalhill.org), will remain the City's primary means of Internet communication.
- B. The establishment of City social media sites is subject to approval of the City Council. Upon approval, these sites shall bear the name and official City seal and logo, and shall be branded as "the official site of the City of Signal Hill."
- C. City social media sites shall link back to the City's official website for further information, documents, forms, etc.
- D. Social media will not be the primary tool used for disseminating emergency information. Emergency information may be released on social media sites, but not before release on the City's website, Nixle, or other emergency information systems.
- E. City social media sites shall be managed consistent with the Brown Act. Members of the City Council, City Commissions, and any boards or committees established by the City shall not respond to or participate in any published postings, or use the site to respond to, post, blog, engage in serial meetings, or otherwise discuss, deliberate, or express opinion on any issue within the subject matter of the jurisdiction of the body.
- F. All social media sites utilized by the City shall be one-way communication tools and shall not permit comments or postings except for those authorized by department heads in accordance with this Policy. The City Council shall specifically authorize any site which provides a two-way communication tool and which allows for public

comments said social media site shall not be utilized until amendments to this Policy are made.

- G. The City Manager or his/her designee reserves the right to terminate any City social media site at any time without notice. The City Manager or his/her designee shall notify the City Council of his/her decision to terminate the use of an approved social media site.
- H. City social media sites shall comply with usage rules and regulations required by the site provider, including privacy policies.
- I. All City social media sites shall adhere to applicable federal, state, and local laws, regulations and policies. This includes laws and policies regarding copyrights, records retention, Freedom of Information Act, First Amendment, privacy laws, and information security.
- J. The City's social media sites shall comply with the City's Conflict of Interest code and applicable ethics rules and policies.
- K. The City's social media sites are subject to the California Public Records Act. Any content maintained in a social media format that is related to City business, including a list of subscribers and posted communication is a public record. The City's social media sites shall clearly indicate that any articles and/or any other content posted or submitted for posting may be or are subject to public disclosure requests and shall contain the following disclaimer language, "This site is intended to serve as a vehicle for communication between the City of Signal Hill and the public. All public records requests should be directed to the office of the Signal Hill City Clerk."
- L. Each department shall be responsible to ensure that all posted content is kept and preserved in accordance with the City's records retention schedule in an appropriately labeled folder on a City server in a format that preserves the integrity of the original record and is easily accessible.
- M. Users and visitors to the City's social media sites shall be notified of the intended purpose of the site via the City's privacy policy and terms of use through links back to the City's website.
- N. The City Manager or his/her designee reserves the right to restrict, review, or remove any content that is deemed in violation of this policy or any applicable law.
- O. The City reserves the right to change, modify, or amend all or part of this policy at any time.

- P. All posts made by the City shall reflect the official views of the City. Any employee authorized to post items on any of the City's social media sites shall not express his/her own personal views or concerns through such postings.

## **V. PROCEDURE**

When posting on social networking websites or other social media channels on behalf of the City, employees are, in effect, serving as the voice of the City. Therefore, all posting shall be in accordance with the guidelines set forth below.

### **A. Employee Access**

1. Only department heads and employees authorized by his/her department head are authorized to post the department head's approved material on a social media site on behalf of the City.
2. Any employee authorized to post items on any of the City's social media sites shall review, be familiar with, and comply with the social media site's use policies, and terms and conditions.
3. City employees shall:
  - a. Not post personal comments or personal photos.
  - b. Be transparent and truthful – honesty or dishonesty will be quickly noticed in the social media environment. Always be careful and considerate. Once the words are out there, you cannot get them back.
  - c. Be timely – departments should review the site at least once each week to ensure that content is current, accurate, and appropriate.
  - d. Be cautious – ensure your efforts to be transparent, do not violate the City's privacy, confidentiality, and legal guidelines. Do not publish any material that is meant to be confidential or internal to the City.
  - e. Be responsible – what you write is ultimately your responsibility so treat it seriously. If you are uncomfortable, discuss the issue with your department head.
  - f. Admit mistakes – be upfront and quick with a correction, and notify your department head.

### **B. Account Management**

Establishing an account on a social media site provides a department with the full range of tools and capabilities for that site including posting information.

1. The specific social networking site must be approved in advance by the City Council.
2. The Administrative Services Officer/Finance Director shall be responsible to maintain list of all social networking application domain names, maintain names of all employee administrators of these accounts, and maintain list of associated user identifications and passwords. The signed policy acknowledgement forms shall be kept in an employees' personnel file.
3. Each department head will designate a staff member to post authorized information and ensure the site is up to date.
4. Designated staff shall participate in training in the use of the specific social media site to be used prior to being allowed to post on a social media site. Training will be provided by the City.
5. Each department will have only one account per social media site.
6. Posting information on social media site on behalf of the City is subject to applicable policies of the City regarding use of City computers and technology.
7. All City social media sites shall utilize authorized City contact information for account setup, monitoring, and access. The use of personal email accounts or phone numbers by any City employee is not allowed for the purpose of setting up, monitoring, or accessing a City social media site.

#### C. Acceptable Use

Social media use is for city communication and for the purpose of fulfilling job duties, in accordance with City goals and objectives detailed in this policy, and not for personal use.

1. Employees shall follow regulations and policies according to the City's Electronic Mail policy.
2. Use of City provided Internet and email is a privilege. Unauthorized use, violation of this policy, or violation of the Internet Use Policy may result in the loss of access for the user and depending on the seriousness of the infraction, may result in disciplinary action.
3. There are restrictions and limitations to use of the Internet and its related technologies. Personal use may be subject to public records laws and bring this use under scrutiny by the media and public.

4. Postings shall be made during normal business hours except in the event that emergency information must be disseminated or as directed by the Department Head.
5. Except as expressly provided in this policy, accessing any social media site shall comply with all applicable City policies pertaining to communications and the use of the Internet by employees, including email.

#### D. Employee Conduct

Be sure that all content associated with your department is consistent with the City's values and professional standards.

1. Use every effort to keep posted information factual and accurate.
2. Strive for transparency and openness.
3. Correct any information communicated that is later found to be in error.
4. Protect privacy and honor permissions granted by approved social media sites.
5. Review, respect and follow the rules of the social media site.
6. Each authorized employee posting on behalf of the City shall conduct themselves at all times as a professional representative of the City and shall review, be familiar with, and comply with all policies and procedures regarding social media (as further referenced herein).
7. Prior to posting on any social media venue, each authorized employee shall sign an acknowledgement of receipt of this policy indicating that he/she has read and understands all of its provisions and agrees to be bound by same.
8. All posts shall be consistent with written or published information by the City. Any employee authorized to post items on any of the City's social media sites shall not express his/her own personal views or concerns through such postings.
9. Except as expressly provided in this policy, accessing any social media site shall comply with all applicable City policies pertaining to communications and the use of the Internet by employees, including email.
10. Personal devices are subject to subpoena in a lawsuit. Authorized employees shall only use City owned equipment to work on social media sites on behalf of the City.

## E. Content

Departments are responsible for establishing, publishing, and updating their pages on social media sites. Although it will be the department's responsibility to maintain the content, the City Manager or his/her designee will monitor the content on each of the City's pages to ensure that a consistent Citywide message is being conveyed and ensure adherence to this Social Media Policy.

1. Responsibility for creating content is given to the department head who authorized the creation of the social media account.
2. All departments shall use a consistent template as drafted or created by the Finance Department.
3. City social media sites may contain content, including but not limited to, advertisements or hyperlinks over which the City has no control. The City does not endorse any hyperlink or advertisement placed on the City social media sites by the social media site's owners, vendors, or partners.
4. Posts shall be timely, informative, and related to the interests of the Signal Hill Community.
5. Departments will use proper grammar and shall avoid jargon, abbreviations, and acronyms.
6. The City must be able to immediately edit or remove content from social media sites that does not adhere to this policy. All passwords, usernames or other information necessary for removal content shall be provided to Administrative Services Officer/Finance Director at the time of creation of a social media site.
7. Posted content shall comply with the following:
  - a. Present the City in a positive light.
  - b. Pertain directly or be closely related to the interests of the City of Signal Hill.
  - c. Contain information that is freely available to the public and that is not made confidential by any policy of the City, or by any other local, state, or federal law, e.g., press releases, news, events, street closures, traffic issues, weather, police announcements, job postings, emergency notices.
  - d. The content of City social media sites shall only pertain to City-sponsored or City-endorsed programs, services, and events. Content includes, but

is not limited to, information, photos, video, and hyperlink directing users back to the City's official website for in-depth information, forms, documents, or online services necessary to conduct business with the City.

- e. The City shall ensure and maintain full permission or rights to any content posted by departments, including photos and video.
- f. All content on the City social media sites must be approved by the department head prior to posting.

8. Posted content shall not include the following:

- a. Content shall not contain any personal information except the names of employees whose job duties include being available for contact by the public.
- b. Postings shall not include photos or images of anyone who can be identified without first obtaining a signed release of any such person, or parent of a minor, so depicted, except for publicly obtained pictures/videos involving public social events.
- c. Postings or sites shall not include or incorporate the City's logo or seal unless approved in advance by the department head (see Signal Hill Municipal Code Chapter 1.02).
- d. Content of the postings shall not include content as follows:
  - a. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation;
  - b. Sexual content or links to sexual content;
  - c. Solicitations of commerce;
  - d. Conduct or encouragement of illegal activity;
  - e. Information that may tend to compromise the safety or security of the public or public systems;
  - f. Content that violates the legal ownership interest of any other party;
  - g. Political, campaign or election content;
  - h. Any content that violates any local, county, state or federal law or regulation.



- e. All employees are on notice that the following areas are considered unprotected speech under the First Amendment and are not permitted on any City affiliated site:
  - a. Defamatory remarks
  - b. Advocating illegal activity
  - c. Fighting words that can cause imminent harm
  - d. Obscenity or profanity.
- 9. Any video posted to a third party site must also be posted to the City's website for archive purposes.

#### F. Security

- 1. Department heads or his/her designee will maintain complex passwords.
- 2. Administrative Services Officer/Finance Director will hold all username and passwords for social media accounts.
- 3. All attachments will be scanned using anti-virus tools before they can be posted.
- 4. An application must not be used unless it serves an appropriate and valid City purpose, adds to the user experience, and comes from a trusted source. All new social media tools and applications proposed for City use will be approved by the Administrative Services Officer/Finance Director or his/her designee. An application may be removed at any time by the IT Department if the Administrative Services Officer/Finance Director determines that it is causing a security breach or spreading virus.
- 5. The City reserves the right to implement or remove any functionality of its social media site when deemed appropriate by the Administrative Services Officer/Finance Director.
- 6. The site must provide a mechanism for staff to remove City placed posts that violate City policy.

#### G. Legal Issues

All City of Signal Hill social media sites shall adhere to applicable state, federal, and local laws, regulations, and policies including all Information Technology and Records Management City policies and other applicable City policies.

- 1. Freedom of Information Act and e-discovery laws and policies apply to social media content and therefore content must be able to be managed, stored and retrieved to comply with these laws.

2. City of Signal Hill social networking sites are subject to California public records laws. Relevant City of Signal Hill records retention schedules apply to social networking content. Records required to be maintained pursuant to the City's records retention schedule shall be maintained for the required retention period in a format that preserves the integrity of the original record and is easily accessible using the approved City platforms and tools.
3. All social network sites and entries shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure.
4. City social media sites shall comply with usage rules and regulations required by the site provider, including privacy policies.
5. Disclaimers (e.g., "Posts and comments to and from me, in connect with the transaction of public business, are subject to California Public Records Law and may be disclosed to third parties.")
6. Use of personal social media sites to discuss City business may be used in a lawsuit or internal investigation and may expose an employee to personal and professional liability. Employees are not allowed to use their own personal social sites to conduct or comment about City business or a public record. Failure to follow this policy may expose employees to violation of California's public record and public meeting laws. Employees are also hereby warned that any business related statements can be exposed in a public records request and used against the employee in court. Social media sites offer the employee no protection from libel, privacy or other civil or criminal actions.

## **V. EXCEPTIONS**

There are no exceptions to this policy. See separate City policies mentioned in this document.

## **VI. DEFINITIONS**

**Acceptable Use:** Guidelines on how employees are expected to use social media tools while at work, including issues such as time of use, purposes of use, and types of equipment.

**Account Management:** Procedures for creation, maintenance, and destruction of social media accounts.

**City Social Media Sites:** Social media sites which the City establishes and maintains, and has control of all postings (excluding advertisements or hyperlinks on the social media

vendor's website). The City social media will supplement, not replace, the City's official website for all notices and events.

**Employee(s):** Shall include all City employees (full-time, part-time, temporary and seasonal), volunteers, contractors, consultants, vendors and other persons at the City, including all personnel affiliated with third parties who have access and/or authorization to use City Social Media Sites.

**Employee Access:** The degree to which authorized employees are allowed to access social media sites while at work and the procedures for gaining access.

**Legal Issues:** Legal considerations, parameters and requirements for use of social media.

**Post:** Items of information, articles, photos, video, etc., placed on a City social media site.

**Security:** Security procedures for safeguarding City data and infrastructure.

**Social Media:** The term "social media" is used to refer to various activities that integrate technology, social interaction and content creation. Social media allow people, business and governmental entities to create online content and organize, edit or comment on it, as well as combine and share it. Social media use many technologies and forms, including web feeds, blogs, photo and video sharing, podcasts, social networking and more. Social media is an Internet based communication tool with a focus on immediacy, interactivity, participation, and information sharing.

ATTACHMENT "A"

CITY OF SIGNAL HILL  
EMPLOYEE ACKNOWLEDGEMENT: SOCIAL MEDIA POLICY

I hereby acknowledge receiving a copy of the Social Media Policy, and receiving Social Media training. I was given reasonable opportunity to ask questions during the training session, and clearly understand the material. I also understand that any questions concerning this policy may be addressed to the Deputy City Manager.

I understand that the City's social media system and computer network are for City business only and that I am not to establish and/or use a private social media account. I further understand that all information contained on or communicated through the social media system and computer network are subject to monitoring, review, and disclosure. Consequently, I may not assume that any information stored on or communicated through any City system or network is confidential or private. To the contrary, I acknowledge I have no reasonable expectation of privacy in any communications, data or information on any City system, network or equipment. Finally, I understand that violation of this Policy may result in disciplinary action, up to and including termination.

Name (printed) \_\_\_\_\_

Signature \_\_\_\_\_ Date: \_\_\_\_\_

Department and Title \_\_\_\_\_