



SOCIAL MEDIA POLICY AND PROCEDURE

Policy No: 33-100

Effective Date: December 1, 2022

Division: City Manager’s Office

Distribution: All Departments

Related Policies:

Last Revision: January 18, 2012

Purpose

The City of Woodland (“The City” or “City”) has a public service need to communicate with the community via social media platforms. The City also has an overriding interest in directing what is communicated and how it is shared as it strives to effectively reach residents wherever they consume information, whether in more traditional media or on social media platforms.

In general, the City supports the use of social media to enhance communication and information sharing to further the goals of the City and the public service missions of its departments. “Social media” means content created by individuals, using accessible, expandable, and upgradable publishing technologies, through and on the internet. Examples of social media include, but are not limited to, Facebook, Twitter, Blogs, RSS, YouTube, LinkedIn, Instagram, Nextdoor, and Flickr.

This document establishes protocols and guidelines for posting content, information, articles, pictures, videos, or any other form of communication on a social media platform on behalf of the City that supports high quality, accurate online communication as well as the use of social media that mitigates risk from the use of technology. This policy is subject to revision as needed and shall apply to all City departments, officials, and employees, volunteers, and any consultants, providers, and contractors acting in an official capacity and when communicating with the public on behalf of the City unless expressly provided.

APPROVALS	
Name: Ken Hiatt	Signature: 
Title: City Manager	Date: December 1, 2022

Roles and Responsibilities

Communications Manager Role

The Communication and Strategic Policy Manager (hereafter referred to as “Communications Manager”) will maintain the City’s general social media accounts (those using the account handle or title “City of Woodland”) and help develop strategies to share key information and engage Woodland residents. The Communications Manager shall ensure that the City is regularly retaining all City social media posts, associated comments, and other generated material as contemplated by this Policy and in accordance with the City’s Records Retention Schedule. This includes regularly reviewing department use of social media, enforcing compliance with this policy, and providing feedback regarding social media use.

Department Heads and Designees Roles

With guidance from the Communications Manager and within the guidelines of this policy, department heads and their social media designees may establish and terminate social media use at the department level and set goals regarding their department’s social media presence.

Prior to authorizing use of social media for City-related purposes, department heads shall consider potential drawbacks. Analysis of these drawbacks should include:

- Employee productivity
- Ability to maintain an ongoing, consistent social media presence
- Potential outlet for exposure or leakage of sensitive information

In addition, department heads shall also consider the potential benefits of social media use. Analysis of these benefits should include:

- Delivering information to people on their preferred and/or most-used platforms
- Sharing key information via multiple channels (newspaper, social media, website, etc.) and formats (text, video, graphics, etc.)

Department-level violations of this policy may result in the removal of administrative access and/or the removal of City-affiliated accounts.

All City social media accounts shall utilize authorized City contact information for account set-up, 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.

Access, Management, and Strategy

Acceptable Uses

Social media is for official City Department communications with the purpose of promoting the City's broad goals and specific programmatic interests. Personal use is not acceptable. Accounts may interact with community members to share credible information or answer questions, but the primary purpose of the City's accounts is to inform the community about resources, news, and other City-related items.

Management

As mentioned above, the Communications Manager administers and moderates the City's social media accounts and enforces this Policy. The Communications Manager approves City use of social media platforms upon consultation with the City Attorney, and, when appropriate, Human Resources. The Communications Manager also works with the Information Technology Manager to protect City information and technology assets in that use. All approvals should come in the form of written email communication.

Content posted on a social media platform may also be subject to third-party, site-specific terms of use. The City reserves the right to report violations of a third-party platform's terms of use. The City also reserves the right to report any posting on any social media platform, whether a City social media account or not, to law enforcement.

Strategy

Social media strategies should broadly include a discussion of target audiences, objectives, staff resources, technical capabilities, and potential benefits.

While using social media in an official capacity or engaging with a comment/post, account administrators should continually ask themselves:

- Am I sharing factual, accurate information?
- Am I using clear, plain language that is easily understandable?
- Does this comment require an official City reply? Should this issue be handled offline and/or with a particular City staff member?
- Is there misinformation being spread that I could easily correct?
- Did I make a factual or grammatical mistake?
- Am I posting thoughtful, respectful, inclusive content?

If staff members have questions about content, such as if a comment requires a reply or if a post violates this policy, they should contact the Communications Manager.

Security, Passwords, and Emergencies

During emergencies that activate the Emergency Operations Center (EOC), all social media content and postings must be coordinated with the Public Information Officer (Communications Manager), or designee, as part of the emergency public information support function.

Employees may manage accounts from personal mobile devices such as smart phones. If used, these devices must be protected by a passcode or a similar security measure.

Depending on the incident, staff may be directed to post about specific information or resources. The Communications Manager, in their capacity as Public Information Officer, may work with department designees to publish content directly to any official City social media site during an emergency.

Should the Public Information Officer (Communications Manager) be unavailable or unable to execute their duties, password and login information for all City social media accounts must be maintained in the City's secure shared drive.

Content Guidelines, Comments, and Deletions

Guidelines for Posts by City Representatives and Employees on City Social Media Platforms

- The content of City social media platforms should pertain to City-sponsored or City-endorsed programs, services, events, and events in the City's broad public interest. Content includes, but is not limited to, information, photographs, videos, and hyperlinks.
- When applicable, content posted to the City's social media platforms should contain hyperlinks directing users back to the City or City department's official website for in-depth information, forms, documents or online services necessary to conduct business with the City.
- The City shall have full permission or rights to any original content posted by the City, including photographs and videos.
 - In accordance with AB 1475, the police department shall not post booking photos of an individual arrested on suspicion of committing a nonviolent crime on social media unless:
 - The suspect is a fugitive or an imminent threat to an individual or to public safety and releasing or disseminating the suspect's image will assist in locating or apprehending the suspect or reducing or eliminating the threat;

- A judge orders the release or dissemination of the suspect's image based on a finding that the release or dissemination is in furtherance of a legitimate law enforcement interest; or,
 - Exigent circumstances necessitate the dissemination of the suspect's image in furtherance of an urgent and legitimate law enforcement interest.
- An authorized City representative posting on a City social media account shall review, be familiar with, and comply with the terms of use of the social media platform's policies and terms and conditions.
- City social media sites shall be managed consistent with the Brown Act. Members of City legislative bodies, including advisory committees and commissions, shall not prepare, respond to, "like," re-tweet, "share," or otherwise participate in any City social media site posting on a subject matter within their legislative or decision-making jurisdiction. Further, a member of a legislative body shall not use any social media site, or any other form of electronic communication to discuss, deliberate, or exchange views or opinions with any other official who serves with him/her as a member of the same legislative body, in relation to any issue within the subject matter jurisdiction of that legislative body in a manner that would violate the Brown Act's prohibition on serial meetings. This prohibition shall not otherwise limit any official's First Amendment rights to free speech and expression via social media.
- An authorized City representative posting on a City social media account shall not express their own personal views or concerns through such postings. Instead, postings on any City social media account shall only reflect the views of the City.
- Postings must contain information that is freely available to the public and not be confidential as defined by any City Policy, or state or federal law.
- Postings may not contain any personal identifiable information, except for the names of City representatives whose job duties include being available for contact by the public, or in cases when law enforcement agencies can and should share information in accordance with Government Code section 6254 (f)(1).

Unacceptable Content - Guidelines for the Public

Posts and comments by the public on City accounts are welcome but will be monitored regularly. The City reserves the right to delete or hide comments, mentions, or other social media submissions that contain:

- Vulgar, profane, obscene, or sexually explicit content or links to such content
- Personal attacks or abusive, harassing, or threatening content, in whatever form, or a link to such content
- Potentially libelous or defamatory comments
- Content that promotes, fosters, or perpetuates discrimination on the basis of actual or perceived race, creed, color, sex, ethnicity, age, religion, gender, marital status, status with regards to public assistance, ancestry, national origin (i.e., place of origin, immigration status, cultural or linguistic characteristics, or ethnicity), physical or mental disability, medical condition, socioeconomic status, sexual orientation, gender identity, gender expression, or any other category protected by federal, state, or local laws
- Spam, advertisements, and solicitation of commerce
- Promotion of illegal activities
- Content that promotes or opposes political organizations or specific figures
- Content in support of, or in opposition to, political campaigns, candidates or ballot measures, or a link to such content
- Personal political views
- Infringements on copyrights or trademarks
- Personal and/or identifiable private information, such as medical information
- Information that may compromise the safety, security, or proceedings of public systems, any criminal or civil investigations, or public health efforts, including vaccination campaigns
- Content that violates a legal interest or right of any other party
- Content discovered to have been posted using a fake account or a “bot”
- Content that is not topically related to a particular posting that is the subject of comment in relation to the posting in question
- Content inconsistent with this Policy or other City policies
- Any conduct in violation of local, state, or federal law

In addition, official City accounts should never post content that contains or could be interpreted to contain any of the above bullet points.

This policy, including these content guidelines and the list above, shall be displayed to all users, made available by hyperlink on all City social media sites, and shall be posted on the City’s website and maintained as a public record at the City Clerk’s office.

Hiding / Blocking / Deleting Policy

The City reserves the right to refrain from posting, or to remove or otherwise restrict content that is not consistent with this Policy and other City policies, or that it is in violation of applicable law(s). Such administration and moderation shall also include ensuring compliance by City with all applicable federal, state, county, and local laws, regulations, and policies. The City reserves the right to remove content posted to its social media accounts that violates its guidelines and this Policy, but must retain a record of any such removed content in line with this Policy.

If it is determined that any social media post needs to be corrected, amended, or clarified, the City will determine what modification or supplement to the earlier social media communication is needed.

An employee seeking a correction should raise any concern with their supervisor in writing and include a copy to the Communications Manager. Any modification to a published post must be retained in accordance with the procedures described in this Policy.

The City reserves the right to deny access to City social media content for any individual who persistently violates the City's Social Media Policy. To the extent possible, the City shall provide the offending individual with at least one warning prior to denying access to City social media accounts. This denial of access can take the form of "hiding" or deleting offending comments and/or "blocking" users from following City accounts.

The City reserves the right to implement or remove any functionality of any City social media account, when deemed appropriate by the Communications Manager, the City Manager, or department heads, as appropriate. This includes, but is not limited to, information, articles, pictures, videos, or any other form of communication that is posted on a City social media site. Notwithstanding the foregoing, the City's removal of any third-party's post on a City social media site shall not be based on the individual or entity's expressed viewpoint.

The City shall retain a true, correct, and complete copy of any posting removed based on this Policy, including the time, date and identity of the poster, which shall be retained in line with the City's adopted Records Retention Schedule, with a minimum retention of no less than two (2) years.

Except as expressly provided in this Policy, any social media account access shall comply with all applicable City policies pertaining to communications and the use of the internet by employees, including email content.

It is understood that social media is a 24/7 medium, however, the City’s moderation capabilities are not. The City may not see inappropriate content right away, and trusts in the maturity of the community to ignore inappropriate or harmful speech until it can be reviewed and/or removed.

Compliance with Platforms’ Rules and Regulations

All posts from City pages must comply with various social media platforms’ terms, rules, and regulations. Similarly, all comments and engagement with City content on social media must comply with that platform’s terms. The City reserves the right to report any violation of a platform’s terms with the intent of the platform taking responsive action.

Employee Conduct and Personal Use of Social Media (also listed in employee handbook)

As ambassadors and public servants, employees using their personal social media accounts should conduct themselves at all times as professional representatives of the City of Woodland and in accordance with all applicable City policies. Employees that fail to use social media platforms in a manner consistent with this policy and all other City of Woodland conduct-related policies may be subject to disciplinary action.

In general, the City discourages employees from interacting with other actors on social media regarding City issues and topics. When an employee does choose to post, interact, or engage with City-related issues or topics, employees are encouraged keep the interactions factual, transparent, short, and credibly-sourced.

When employees use social media, all City of Woodland conduct-related policies remain in effect, including the policy against harassment in the workplace and various disciplinary action procedures.

The City is not responsible for the contents or accuracy of material posted when a City representative bound by this Policy is using social media in a personal capacity, as opposed to posting on a City social media account in an authorized capacity. Publication of such content on a personal social media site does not constitute an endorsement by the City. City representatives acting in a personal capacity should do everything reasonably practicable to make certain that it does not appear to other social media users or the public that he or she is speaking for the City.

The City recognizes that Council members, City officials, employees, contractors, volunteers, and other City representatives have the right to express their personal views through personal social media usage. However, City representatives bound by this Policy must understand that non-public information (e.g., personal privacy information, proprietary information, confidential information, information pertaining to pending or threatened litigation, personnel matters, attorney-client privileged and attorney work-product

information, information subject to government privileges, etc.) may not be conveyed through social media unless and until the release of such information becomes lawful and has been authorized by the City in accordance with Federal or State law.

City representatives bound by this Policy shall not use official City email accounts when establishing, setting up, or using social media accounts for personal or non-City/non-official activities.

City representatives bound by this Policy shall not use their City position, title, or authority to endorse any product, service, company, non-profit organization, or any other enterprise on social media unless such endorsement is authorized by the Communications Manager, the City Manager, or designee in compliance with this Policy.

When City representatives bound by this Policy use social media in their respective personal capacities, posts related to City business may be deemed public records under the California Public Records Act. When a City representative publishes a social media post, or engages in an exchange about City business via his/her personal social media account, he/she may transform that otherwise personal social media account into an account subject to Federal and State laws; including but not limited to the California Public Records Act, record retention requirements, and First Amendment principles, among others. This conduct may also limit the ability of City officials to legally “block” third parties from viewing or posting on that purportedly personal social media site. City representatives may avoid transforming their personal social media accounts into accounts subject to this Policy and Federal and State open government laws by, among other things, not holding the social media account out as an official City account, and not engaging in discussions of City business on that social media account.

Policy and Legal Concerns

Archiving and Records

Staff cannot delete or hide comments from social media posts unless they violate the terms listed above. Department designees must share a record of any deleted content with the Communications Manager, who will retain a copy of every deleted item/comment in the City’s secured shared network drive. This record should include a screenshot of the content before its removal.

No expectation of privacy exists with respect to any content maintained on City social media platforms.

Compliance

Any City social media account must comply with all applicable Federal, State and County laws, regulations and policies. This includes adherence to established laws and policies regarding copyright,

records retention, the California Public Records Act, the First Amendment, privacy laws, employment laws, and information security policies.

Misuse and abuse of City social media platforms and/or related software is a violation of the City's Social Media Policy, and may result in disciplinary action up to and including revoked access to City social media accounts, and for City employees, dismissal from employment and referral for criminal prosecution.

Additionally, failure of City employees or officials to abide by this Policy, following its adoption, may result in one or more of the following:

- Disciplinary action, up to and including termination (for City staff);
- Removal from office (for City officials);
- Censure (for City officials);
- Breach of contract (for consultants);
- Revocation of electronic device privileges; and
- Judicial enforcement against the City directly, by the requesting party.

Content and Photo Releases

Permission must be granted to the City of Woodland for photos/videos not already in the public domain. If the source where content was acquired says no credit is needed, it may be used without attribution. Otherwise, staff shall add attribution to the post.

In addition, unless already in the public domain, account administrators must obtain photo release waiver from the parents/guardians of minors. This includes situations in which the owner's permission has already been given, but to a different entity that is not a City-affiliated account. If hosting a joint event, staff should simply make sure that the waiver releases content to all the entities that may use it. Photo release forms can be obtained from the Communications Manager.