



# City of Santa Clarita POLICY/PROCEDURE

Number III-27

## MEDIA COMMUNICATIONS AND SOCIAL MEDIA POLICY

ORIGINAL ISSUE

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CATEGORY: PERSONNEL

RESPONSIBLE DEPARTMENT: CITY MANAGER'S OFFICE

### STANDARD MANAGEMENT PROCEDURE

#### I. PURPOSE

The City of Santa Clarita ("City") has an overriding interest and expectation in deciding what is presented as the City's official position to media representatives. This policy establishes the City's guidelines with respect to providing effective media relations and ensuring that accurate and appropriate information is released to the news media.

The City recognizes that social media plays an increasingly important role in society and communication. This policy is to establish guidelines on the use of social media sites by the City as an additional means of conveying City-related information to the public and maximizing the promotion of City-managed programs and services. This policy also is designed to establish lawful and proper parameters for employees' personal use of social media while employed with the City.

While social media presents many benefits, such as community engagement through an interactive platform, it also presents certain risks of liability to the City. This policy is intended to mitigate associated risks from use of social media technology where possible. This policy is in addition to and complements the City's Use of Electronic Communications Systems Policy III-13.2 regarding the use of technology, computers, social media, e-mail and the internet.

The City has an overriding interest and expectation in protecting the integrity of information posted on its social media pages and deciding what is "spoken" on behalf of the City. This policy applies wholly to the City and all City employees. There are additional provisions of this policy that apply to City employees who use social media sites and/or technology on behalf of the City.

Although social media provides an interactive platform, the City intends to create only a limited public forum subject to the restrictions set forth in this policy as well as any host social media site's terms of use. All questions relating to this policy should be directed to the Communications Division Manager.

#### II. DEFINITIONS

A. "Social media sites" refers to interactive platforms and technologies which allow entities or individuals to post or publish content through and on the internet. Social media uses

many technologies and platforms, including social networking, blogs, wikis, photo and video sharing, and more.

B. "City social media page" means a page on a social media site which the City establishes and maintains, and over which it has control over all postings, except for advertisements or hyperlinks by the social media site's owners, vendors or partners. The City has approved several social media platforms for its official social media presence, and is constantly assessing emerging platforms. No additional social media platforms are to be utilized without express authorization from the Communications Manager.

C. "City social media team" refers to those City employees specifically authorized by the City to create content or to post or comment on a City social media page on behalf of the City. The City social media team is comprised of the Communications Manager, Communications staff, designated members of Technology Services, Economic Development and Arts and Events Divisions, and other individuals designated by the Communications Manager. Only members of the City social media team may post or comment on behalf of the City. Members of the City social media team must be provided this policy and sign the acknowledgement (attachment A) prior to the creation of any content.

D. "Employee" means any person employed by the City of Santa Clarita, including full-time, part-time, temporary, seasonal, and probationary employees.

E. "Post," "Comment" or "Share" means information, articles, pictures, videos, hyperlinks or any other form of content or communication posted on any City social media page.

### III. POLICY FOR PERSONAL USE OF SOCIAL MEDIA

A. While employees may voluntarily choose to engage with the City on its social media pages, the City does not encourage or require any employee to follow or "like" City social media sites.

B. The personal use of social media by a City employee in a manner that violates any City policy or procedure will not be tolerated, and may be grounds for disciplinary action, up to and including termination. Employees are expected to comply with the same ethical and performance standards on-line as in the workplace. Using social media in a way that adversely impacts the employee's job, co-workers, the City, or the public is prohibited.

C. Employees may not post any content on the internet or social media that constitutes or contains City confidential, proprietary, privileged, private, personnel, or other non-public information.

D. Employees may not use their official City email addresses to create or maintain any personal social media page(s). City employees are prohibited from using the City logo or informal logo, representing the City, or representing that they speak on behalf of the City. Employees must also make clear in any on-line activity that the views and opinions they

express about work-related matters are their own, have not been reviewed by the City, and do not necessarily represent the views and opinions of the City.

E. This policy is not intended to prohibit conduct permitted by Section 3502 of the Meyers-Milias-Brown Act or any other state or federal law. Accordingly, City employees are expressly permitted to discuss wages, hours, working conditions, and union-related activity without fear of reprisal. However, personal grievances, offensive, demeaning, defamatory, abusive and inappropriate remarks about colleagues and City officials is not protected activity and may lead to discipline if found to violate applicable City policies.

#### **IV. POLICY FOR CITY SOCIAL MEDIA COMMUNICATIONS**

A. The City's official website at [www.santa-clarita.com](http://www.santa-clarita.com) is the City's primary source and means of internet communication. To the extent possible, a link to the City's official website shall be included on any City social media page. Wherever possible, City social media pages should link back to the official City website for forms, documents, online services and other information necessary to conduct business with the City. Information posted by the City on social media pages will supplement and not replace required notices and standard methods of communication.

B. Not all forms of social media may be appropriate for use by the City. Any social media page established on behalf of the City must be approved by the Communications Manager. Consideration shall be given to the overall nature, theme and suitability for use for City purposes.

C. City social media pages should make clear that they are maintained by the City and state that they follow the City's use of social media policy and the host site's terms of use. City social media pages are City property and are not for personal use or benefit.

D. City social media sites shall bear the name of the City. If feasible, City social media sites shall also bear the City's official logo or informal logo as designated by the City's graphics standards. Wherever applicable, City social media sites shall be classified and registered with the service provider as "Official" and/or Government Entity sites. The social media team shall take advantage of all options provided by the service provider for Government Entity sites that provide additional protections for the City.

E. Photos and other images may be posted only when they are the property of the City or the owner has provided consent for use. All photos posted by the City on its social media pages shall be for use in marketing and promotion of City programs and services. Under no circumstances will the City use photos of individuals who expressly ask that their photos not be made public or photos of children without the express written consent of a parent or legal guardian.

F. Many social media sites allow the City to "like" or "follow" other site users or to share content posted by other site users. Express permission to like or follow any entity, organization, or individual must be obtained from the Communications Manager. Sharing or re-posting content is permissible if relevant to City business, programs, services, or

events and the City has full permission or rights to do so; however, **sharing or re-posting political, social or religious material is prohibited.**

G. Content posted on a City social media page may be subject to the California Public Records Act. Any content maintained in a social media format that is related to City business, posted communication, communication submitted for posting, and removed content, may be a public record subject to public disclosure.

H. Members of the City social media team who are authorized to post content on behalf of the City on its social media pages must conduct themselves at all times as a professional representative of the City and in accordance with all City policies, and will be provided this policy and sign the acknowledgement (attachment A).

## V. SITE MANAGEMENT AND CONTENT

A. Before creating any new City social media page, the Communications Manager shall work with the City Attorney to review the host site's contract, terms of use, rules and regulations. Members of the City social media team shall not execute or enter into a contract for web services, internet applications, or any other document binding the City, without proper authorization and prior review of the contract by the City Attorney. Clicking a box marked "I agree" or "I accept" constitutes a binding electronic signature and entering into a contract. Prior to clicking any such acceptance box, employees must first print out the contract, determine if they have sufficient authority to bind the City to such a contract, and submit it to the City Attorney for review.

B. All City social media pages must be established by using an official City email address. All log in and password information shall be maintained by the Technology Services Division. The Communications Manager is required to have full, complete and immediate access to administer all aspects of City social media sites. In addition, the City's Technology Services Division shall concurrently maintain all log-in, password, and other administrative credentials for all City social media sites.

C. The City's social media pages are to be used for informational purposes and all content must pertain to the City and/or City business, programs, services or events. Confidential, proprietary, privileged, private, personnel, or other non-public information is not to be posted or discussed on any City social media page.

D. The City shall have full permission and rights to any content posted by or on behalf of the City, including all articles, photographs and videos.

E. City social media pages shall be managed consistent with the Brown Act.

F. No City employee or official may use any City social media site for campaign-related purposes. Such campaign-related purposes include, but are not limited to, the following:

1. Statements in support or opposition to any candidate or ballot measure;

2. Requests for campaign funds or references to any solicitations of campaign funds;
3. References to the campaign schedule or activities of any candidate.

**G.** No City social media site may be linked to any private web site related to a candidate's campaign for elective office, but they may link directly to the home page of the Office of the City Clerk's election-related pages where general election and candidate information can be found.

**H.** Members of the City social media team will be responsible for posting content on the City's social media pages on behalf of the City, monitoring content, responding to comments where appropriate, and ensuring adherence to this policy.

**I.** Members of the City social media team must review the City's social media pages on a daily basis to ensure compliance with this policy.

**J.** Members of the City social media team must immediately alert the Communications Manager to any content posted on the City's social media pages that potentially violates this policy. Members of the City social media team shall not remove content from any City social media page without consulting with the Communications Manager and City Attorney.

**K.** Any member of the City social media team authorized to post content on the City's social media pages shall not express his or her own personal views or concerns. Rather, posting of content by any authorized member of the City social media team shall only reflect the views of the City.

**L.** The City reserves the right to have any content restricted or removed if deemed to be in violation of this policy or any applicable federal, state, or local law. Any such removed content must be retained consistent with the Public Records Act, where applicable, and/or the City's document retention policy, including the date, time and identify of the poster, when available.

**M.** Content in any post or response made on behalf of the City shall not specifically refer to any City vendor, supplier, member, contractor, employee, or official without the approval of the Communications Manager.

**N.** The City Manager reserves the right to terminate any City social media site at any time, with or without notice.

## **VI. COMMENT AND RESPONSE**

**A.** Many social media sites permit and invite posts and comments by site users. By permitting use of this feature, the City does not intend to create a general public forum, and all comments and posts must comply with this policy. In addition, most social media platforms have their own terms of use and standards of conduct. All content posted on a City social media page must comply with this policy and any host site user guidelines.

**B.** The City's commenting policy, set forth below, must be displayed on any City social media page or made available by hyperlink.

**C.** The City intends for its use of any social media to relate solely to matters of City business, programs, services, or events. A comment or post by a member of the public on any City social media page is the opinion of the commenter or poster only and does not imply endorsement of, agreement with, or reflect the opinions or policies of the City.

**D.** The following posts or comments are inappropriate and are subject to removal or restriction by the City:

1. Profane, obscene, violent, or pornographic content and/or language;
2. Content that promotes, fosters, or perpetuates discrimination or harassment on the basis of race, color, national origin, religious creed, ancestry, physical or mental disability, medical condition, pregnancy, childbirth or related medical condition, age, sexual orientation, sex, gender identity, gender expression, genetic information, military or veteran status, marital status, or any other basis protected by applicable state or federal law;
3. Threats to any person or organization or encouragement of illegal activity;
4. Information that tends to compromise the safety or security of City employees, the public, public systems, or the City's technology resources;
5. Content that violates any legal ownership interest, such as a copyright or trademark;
6. Content containing personal information, such as home addresses, phone numbers, social security numbers, dates of birth or driver's license numbers;
7. Solicitation of commerce, including any advertising or business services or products for sale;
8. Content that violates any federal, state or local laws;
9. Comments in support of or opposition to any political campaigns or ballot measures;
10. Comments not related to City posts, business, information, announcements, and events, or comments not related to the original topic, including random or unintelligible posts.

The above list is not necessarily exhaustive and the City reserves the right to remove or restrict any post or comment that violates the purpose or spirit of this policy.

**E.** The City reserves the right to report a user directly to the host site if a post, comment or other content by the user violates the host site's terms of use.

**F.** No post, comment, or other content shall be removed solely because it is critical of the City, its' officials, employees or programs, or because City staff disagrees with the viewpoint of the comment, content or submittal.

G. Any member of the City social media team authorized to post on the City's social media pages shall use his or her best judgment in deciding whether or not to respond to a post or comment, and shall avoid engaging any user in an argumentative or offensive manner. Any member of the City social media team who encounters an inappropriate situation or abuse by a user of the social media site shall immediately report the situation to the Communications Manager.

H. Any response by an authorized employee made on behalf of the City shall comply with all terms of this policy.

I. Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

J. This policy may be revised at any time upon approval by the City Manager. Every attempt will be made to provide prior notice of any changes. However, when deemed necessary in order to fully protect the City's interests, the interests of the public and City employees, and to more fully protect the safety of the public and public systems, this policy may be changed without notice.

## **VI. MEDIA INQUIRIES AND RELATIONS**

A. The Communications Manager serves as the point person to provide public information to the media. The Communications Manager may refer members of the media to other City staff for public information queries as it pertains to their area of expertise. City staff is required to provide accurate public information as requested by the media in a timely manner.

B. Media inquiries and relations may include, but are not limited to, responding to media requests for information and interviews, issuing news releases, providing public statements and commentary, managing media investigations, and holding media briefings and conferences and media events.

C. The City Manager and the Communications Manager must be informed immediately of inquiries from the news media that relate to sensitive or controversial issues, potential or ongoing litigation, ongoing negotiations or personnel matters, and must be made aware immediately of potentially sensitive issues when it is anticipated that those issues may reach the media. The City Manager will communicate directly with the Communications Manager, the appropriate department head and other City officials as necessary, including the City Attorney and Human Resources Manager, on an as-needed basis to develop strategies for each issue and to determine an appropriate spokesperson.

D. City staff must immediately alert the Communications Manager if contacted by the press on any issue. City staff is not to provide opinions regarding City issues or public information. Nor should staff comment on policy related issues. Any such inquiry must be referred to the Communications Manager.

E. City employees must be authorized by their department head to speak with the media. The

Communications Manager must be made aware of any such authorization or approval.

F. City departments may not issue news releases directly to the media. City departments must work directly with the Communications Manager to share information with the press.

G. Members of the media are permitted to enter public areas without permission. If a member of the media seeks to visit or access non-public City facilities or premises, he or she must send a request directly to the Communications Manager. The media shall be permitted to attend any public meeting.

**VII. EXCEPTIONS**

There are no exceptions to this Policy without the express authorization of the City Manager.

**VIII. AUTHORITY**

By the authority of the City Manager.

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Kenneth W. Striplin  
City Manager