



Approved: _____

SUBJECT: SOCIAL MEDIA POLICY

PURPOSE: To establish citywide guidelines, protocols, and procedures for the use by City staff of third-party platforms – commonly known as social media sites, channels, and technology.

General Policy: To establish citywide guidelines for use by City of Claremont staff of third-party platforms, commonly known as social media sites, channels, and technology.

Provisions:

A. Purpose

1. Claremont regards social media and any official online and Internet presence as a means of augmenting and enhancing traditional communication methods and to engage, convey information to, and communicate with members of the public in order to meet City missions and goals. This policy applies to all City employees, officers, volunteers, and any consultants, providers, and contractors acting in an official capacity and when communicating with the public on behalf of the City.
2. The City intends for its use of any social media site to relate solely to matters of City business and does not, in any way, intend to nor actually create general public forums.
3. For purposes of this policy, social media sites are defined as services through which multiple users can easily publish and share a wide variety of content, including written commentary, pictures, and video/audio files via the Internet.
4. The City has an overriding interest in protecting the integrity of the information posted on its social media sites and the content that is attributed to the City or its officials while, at the same time, mitigating and/or eliminating associated risks from the use of such technology.
5. If the City changes its direction on social media use, this policy will be revised and social media activity shall be adjusted accordingly. Any questions relating to this policy should be directed to the City Manager's Office.
6. While this policy acknowledges that social media is a way to engage with others, this policy is not intended to require City, nor any City employee, nor contractor acting in an official City capacity to actually use social media. City will periodically conduct a risk assessment of the use of social media technology and sites and determine whether the use of social media sites is

appropriate and whether appropriate risk mitigation controls can be implemented.

B. General Policy

1. Primary Communication: While City-approved social media sites are to be used for the purpose stated above, they are not intended to replace nor serve as the primary means of this City's communication with anyone. The City does have an official website. This website shall remain the primary means of online communication with the public.
2. City Identification: To the extent possible, City social media sites shall be consistently branded and contain visual elements/graphics clearly identifying such sites as official City sites, and distinguishing them from non-professional or personal use. Such identification of official City social media sites shall include the use of the City logo, contact information including an official City email address, link to the official City website, and links to other City social media sites, as applicable.
3. PIO Administration: The Public Information Officer is responsible for the administration of the City's social media sites, enforcement of this policy, and securing protection of City information and technology assets against potential destructive technical incidents in the context of social media use. Approval of City social media sites under consideration by this City shall be made by the City Manager following consultation from City legal counsel, human resources, and risk management personnel, as appropriate.
4. Monitoring/Approval: Administration of the City's social media sites shall include, but is not limited to, regular monitoring of each site, as well as reviewing and approving all content for the City's social media sites. The City reserves the right to refrain from posting or to remove any content that is not consistent with this and other City policies or that it is in violation of applicable law(s). Such administration shall also include ensuring compliance by City and authorized posters on City's behalf with all applicable federal, state, county, and local laws, regulations, and policies.
5. Corrections: If it is determined that any social media communication needs to be corrected, amended, or clarified, City will determine what modification or supplement to the earlier social media communication is needed. Employees seeking a correction should raise any concern with the Public Information Officer.
6. List of Sites: The Public Information Officer shall maintain a list of all City social media sites that are approved and operating.
7. Accuracy/Review: The Public Information Officer must maintain accurate City information on social media sites and check for exploitation and misuse by

- reviewing and updating each social media site as necessary and appropriate on a regular basis.
8. Establishment/Use: The establishment and use by any City department of City social media sites are subject to approval by the City Manager.
 9. Only employees authorized in writing by the City Manager may establish and moderate City social media sites. Authorized employees may also be designated for appropriate levels of social media use, as follows: publish, edit, comment, or view only.
 10. City social media sites shall be established using only an official City email address.
 11. Compliance: Only employees who are authorized by the City Manager may post on social media sites (including City social media sites and non-City social media sites) on behalf of the City. Employees representing the City on social media sites shall conduct themselves at all times as a professional representative of the City and shall comply with all City policies and codes of conduct.
 12. Authorization: When a City employee, who has been authorized to post on behalf of the City, posts on a social media site on behalf of the City, the employee's full name, title, and contact information should be made available. Other than the foregoing, the employee shall not share personal information about himself or herself, or any other City employee. Those authorized to speak on behalf of the City in a social media setting shall address issues only within the scope of their specific authorization.
 13. City social media sites shall clearly state that such sites are officially maintained by the City and that the sites comply with the City's Social Media Policy.
 14. Passwords: City social media passwords shall not be shared with unauthorized personnel.
 15. Site Termination/Duty of Care: The City reserves the right to terminate official City social media sites at any time without notice. The use of social media by this City is not intended to create any contract with anyone at any time or in any way, nor is any use of social media by this City intended to create any expectation of action to be taken by City. The public is warned that there is no reasonable expectation that City, nor any emergency services of the City, will respond to any social media posting. City's use of social media is not intended to, nor do they create nor may they be relied upon to create, any rights enforceable by law by any party in a civil or criminal action, nor do they create any obligation or duty of care.
 16. Right to Amend: Technology, social media capabilities and scope, and online behaviors are changing constantly. Because of this constant adjustment and

- adaptation, the City reserves the right to change, modify, or otherwise amend all or part of this Policy at any time.
17. Employee Violations: Any City employee who violates this Policy may be denied access to all City social media sites and subject to disciplinary actions.
 18. Elected Officials: City social media sites shall be managed consistent with the Brown Act, the Political Reform Act, and the California Election Code. Elected and appointed members of this City shall not respond to any published postings, nor use any social media site or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body, or for any political purpose.
 19. Public Records Act: City social media sites are subject to the California Public Records Act. Any content maintained on an official City social media format that is related to City business, including a list of subscribers, posted communications, and communications submitted for posting, may be considered a public record and subject to public disclosure. California Public Records Act requests for the production of social media site content shall be referred to the City Clerk and City legal counsel for review and further handling.
 20. Official Postings: In general, official postings on City social media sites should reflect information that can be found on City's official website or by other official communication means. Social media use on City's behalf is not intended to be a source for original or new City content. If original or new content is created within a social media setting and on City's behalf, it must be captured and maintained in a recordkeeping system that comports with City's Record Retention Policy.
 21. Laws: All City of Claremont City social media sites shall adhere to applicable Federal, State and local laws, as well as City policies and regulations.
 22. Business Purposes: City social media sites shall be maintained by designated City of Claremont City employees and may be used for business purposes only. The City's Social Media Policy governs use of any City administered social media site; regardless of whether the site(s) is (are) accessed from City computers or from computers outside the City.
 23. Restrictions/Removal of Content: The City of Claremont City reserves the right to restrict or remove any content that is in violation of any applicable law or the City's Social Media Policy. Any content which is removed will be retained by the City for a reasonable period of time, and will include the time, date, and user name (or screen name) of the content originator, when possible.
 24. Sponsored by City: All social media sites established and administered by the City of Claremont City will clearly state that they are sponsored by the City

and shall either provide or link to the City's Social Media Policy and Comments Policy.

25. Links: Whenever possible, all City of Claremont City social media sites shall be linked via the appropriate technology to the City's website for forms, documentation, online services and any other information or services necessary to conduct business with the City.
26. Website: The City of Claremont City's website: www.ci.claremont.ca.us will remain the City's primary repository of information regarding City operations, policy, and business.
27. Staff Time: All staff time used on Social Media sites will be to conduct City business only.

C. Content

1. Compliance: City social media sites should be used to communicate City missions and messages where there is a legitimate business purpose to do so. Those authorized to post social media content on behalf of City should carefully weigh options and risk management concerns when deciding whether to use social media at all. Announcements and other City-generated content should be objective and descriptive; use a polite and professional tone; contain only information that is freely available to the public (do not post any content that is not considered public information) and that is not made confidential by any policy of the City, or by local, state or federal law; and such content should comply with all local, state and federal rules, regulations and policies.
2. Third-Party Sites: Third-party social media sites officially used by City should not be the only place in which the public can view City information to the extent possible.
3. Employee/Contractor Posts: When an employee or contractor posts to social media in an official City capacity, the City is responsible for that content. Employees and contractors authorized to post on the City's behalf and in an official capacity should remember that standards of ethical behavior and other City policies apply to online postings. Employees and contractors posting on the City's behalf, when authorized to do so, should assume there is no expectation of privacy when using social media tools on the City's behalf.
4. Disciplinary Action: The failure to comply with this and other applicable policies of City will be reviewed on a case-by-case basis and may result in disciplinary action.
5. City Standards: As a public agency, the City abides by certain standards to serve all constituents in a civil and unbiased manner. As such, the City

has implemented Social Media Comment and Content Moderation policies.

6. Copyright Law: Images, text, video, audio files, and other content are subject to the Copyright Law of the United States of America and related codes, policies, and directives. For questions regarding copyright issues, contact City's legal counsel.
7. City's Right to Restrict: City social media content, including comments, pictures, or other material, containing content that is determined to be detrimental to the purpose of the City's social media sites, shall not be allowed and is subject to removal and/or restriction. Consistent with the purpose of this use of City social media sites as a Limited Public Forum, City reserves the right to moderate, monitor, remove, prohibit, restrict, block, suspend, terminate, delete, discontinue or reject comments and access to comments if they are:
 - i. Profane, obscene, pornographic, abusive, threatening, racist, defamatory, offensive or contain violent language
 - ii. Trolling (posts that are deliberately offensive, provocative, or disruptive and intended to hijack our content, deflect our information off-track, upset someone or create angry responses from employees or other visitors)
 - iii. Messages that are a violation of existing law or regulation
 - iv. Violations of the intellectual property rights of others
 - v. Spam (unsolicited messages that are usually intended as advertising or messages that are repeatedly posted on the same site)
 - vi. Attacks or calls-to-action for attacks on specific groups
 - vii. Intended to harass, threaten or abuse an individual or are defamatory, derogatory, or are personal attacks on any Claremont official, employee, resident, or business person
 - viii. Hateful or discriminatory comments regarding or comments that promote, foster, or perpetuate discrimination or harassment on the basis of race, ethnicity, religion, gender, disability, sexual orientation, political beliefs, or a protected class under local, state, or federal law
 - ix. Links or comments containing sexually explicit content material
 - x. Links to malicious software or sites
 - xi. Cyber-stalking or threats to an individual or organization, or intended to collect or post private information and data without disclosure (e.g., doxxing)
 - xii. Messages that relate to confidential, private, or proprietary information

- xiii. Messages that are inappropriate, in poor taste, or otherwise contrary to the purposes of our site or the business of Claremont
 - xiv. Self-promotion
 - xv. Solicitation of funds
 - xvi. Unsolicited business proposals and inquiries
 - xvii. Reports of criminal or suspicious activity (please contact Claremont Police Department at 909-399-5411 or 911)
 - xviii. Encouragement of illegal or unlawful activity
 - xix. Any form of legal and/or administrative notices or processes
 - xx. Posts not in compliance with our social media host's own terms and conditions
 - xxi. Posts that attempt to or do take over a thread in ways that are contrary to these terms and conditions (including random or unintelligible posts)
8. Opinions/Endorsement: Any unofficial or non-authorized content, and all content posted by a member of the public on the City's social media site, are the opinions of the person making the post. Appearance of content on the City's social media sites does not necessarily imply endorsement of, nor agreement by, the City, nor does such content necessarily reflect the opinions or policies of the City.
9. Violations: The City reserves the right to deny access to City social media sites for any individual who violates this Policy, at any time and without prior notice.
10. City Standards/Third Party Sites: For any social media site approved by City, City may develop additional usage or other standards to optimize City's use of such third-party site.
11. Reporting Violations: Any content posted on a social media site may also be subject to third-party, site-specific rules or policies. The City reserves the right to report any such violations of a third-party site's rules or policies. The City also reserves the right to report any post to law enforcement.

D. Updating and Monitoring Content

1. City Staff will not be moderating discussions or comments on social media platforms. Social media platforms allow for the users to have discussion and express different opinions. The purpose of the City's social media presence is to provide another means of providing information about the City's operation to the public, not to control what is being said about City operations.
2. Designated staff shall monitor the City's social media sites daily during business hours and as needed on weekends. Upon notice of

comments/content violating the Social Media Policy, staff shall remove the content. Content removed for violating the policy shall be archived.

E. Code of Conduct for City Employees

1. All employees shall be provided with a copy of this policy and directed to familiarize themselves with it. Employees' use of social media sites for official business is governed by this policy, as well as applicable City Rules and Regulations. Disciplinary action, up to and including dismissal, may be imposed for violation of this policy by employees of the City of Claremont. If findings warrant, disciplinary action will be initiated in accordance with all relevant sections of the City's Personnel Rules and Regulations.

F. Privacy

1. This City shall establish a Website Privacy Policy. Although some third-party social media providers might be exempt from privacy policy requirements, City will abide by its policy with respect to City's official website. However, City cannot guarantee nor enforce such privacy policies on third-party sites. City will periodically review the privacy policies of third-party social media sites to make a risk assessment as to the continued use of such third-party offerings.

G. Disclaimer

1. City cannot control and is not responsible for unofficial and other content on social media sites.

Revisions:
6-13-17 (new policy)