

CITY OF CULVER CITY
ADMINISTRATIVE POLICY STATEMENT

Policy Number: IV-03

Effective Date: January 30, 2017

Subject: Social Media Administration and Guidelines

Source/Authority: Information Technology/City Manager

Purpose and General Policy:

The intended purpose in establishing City of Culver City (“City”) social media sites is to disseminate information from and about the City to members of the public. This Social Media Administration and Guidelines Policy (“Policy”) is intended to provide policies, procedures and guidelines for the administration of City social media sites by City employees and ensure that use of City social media sites by City officials, as well as the public, is appropriate. Further it establishes the acceptable use of social media sites by the City as a means of conveying information to members of the public; to increase the public’s knowledge, trust, and use of City services; and to promote the value and importance of the City’s mission, meetings, services and activities.

To address the fast-changing landscape of the Internet and the way the public communicates with and obtains information online, City departments may consider participating in social media platforms to reach a broader audience. City departments may utilize social media and social network sites to further enhance communications with various stakeholders and stakeholder organizations in support of City goals and objectives. Social media facilitates further notification/discussion of City issues, operations and services by providing members of the public the opportunity to participate via commonly used Internet tools and platforms. This Policy also establishes security guidelines for management and access to City Social Media Sites.

The City has an overriding interest and expectation in protecting the integrity of the information posted on its social media sites, in the name of and on behalf of the City, and the content that is attributed to the City and its officials.

Scope:

This Policy applies to all Social Media Administrators (including employees, contract employees, independent contractors and volunteers, who are authorized as Social Media Administrators) and their Department Directors. This Policy does not apply to Social Media Sites of the City’s elected or appointed officials used

solely for campaign or personal purposes, or content on employees' personal social media accounts that is not in conflict with City policies, rules and regulations.

This Policy also applies to the public's use of City Social Media Sites.

Except as expressly provided in this Policy, a Social Media Administrator's access to a City Social Media Site or any other social media site shall comply with all applicable City policies pertaining to communications and the use of the Internet and email by employees, as well as any other relevant City policies, resolutions and ordinances.

To the extent there is any conflict between this Policy and any other departmental social media policy, this Policy shall control.

Definitions:

Social Media or Social Media Sites – Internet-based technology communications tools with a focus on immediacy, interactivity, user participation, and information sharing, where its content is created by individuals, using accessible, expandable, and upgradable publishing technologies, through and on the Internet. These media include, but are not limited to, social networking sites, forums, weblogs (blogs, vlogs, and microblogs), online chat sites, and video/photo posting sites or any other such similar output or format. Examples of social media include, but are not limited to, Facebook, Twitter, LinkedIn, Nextdoor, Instagram, Snapchat and YouTube.

City Social Media Site – A Social Media Site established, maintained for and used by the City to communicate with the public on City business, and over which the City has control of all pages, sections or posting locations. City Social Media Sites shall supplement, and not replace, the City's required notices and standard policies, practices and methods of communication.

City Posts or City Postings – Information, articles, comments, photographs, graphics, videos or any other form of communication posted by the City on a City Social Media Site.

Public Comments – Information, articles, comments, photographs, graphics, videos or any other form of communication posted by a member of the public on a City Social Media Site.

Commenter – Any member of the public who posts information, articles, comments, photographs, graphics, videos or any other form of communication on a City Social Media Site

Social Media Administrators – City employees expressly authorized and designated by their Department Directors to establish, maintain and/or oversee their department’s City Social Media Site(s). A Social Media Administrator’s authority is limited to actions that directly reflect guidance from the Social Media Administrator’s Department Director and are consistent with this Policy and the policies and procedures of the Social Media Administrator’s department and the City.

City’s Official Website – The City’s official Internet website at www.culvercity.org (or any domain owned by the City).

Chief Information Officer – The Chief Information Officer for the City of Culver City or his or her designee.

Responsibility:

- The Information Technology (IT) Department shall maintain the City’s official Web presence via Social Media/Networking and the Internet. The City’s Official Website will remain the City’s primary means of Internet communication and predominant Internet presence. The public’s general comments or communications concerning the City or a City department, and public service requests should be directed to the City’s Customer Service Center on the City’s Official Website.
- The IT Department shall administer security and monitoring measures that support this Policy. Content on City Social Media Sites is subject to oversight by the City Manager, the Chief Information Officer and the IT Department to ensure adherence to this Policy and the interest and goals of the City.
- All City departments that want to engage in Social Media/Networking in an official capacity shall coordinate this activity with the IT Department and with the permission of the City Manager or their designee.
- The responsibility for assuring compliance with the provisions of this Policy rests with the applicable Department Director, the department Social Media Administrator and any other authorized employee involved with the establishment, maintenance and monitoring of the department’s City Social Media Site.
- All Social Media Administrators engaged in social media and social networking shall be responsible for staying informed regarding this Policy and all other City policies related to this activity.

- Social Media Administrators shall not grant access to City Social Media Sites to any other employees, unless specifically authorized by the Social Media Administrator's Department Director and the IT Department.
- Each Social Media Administrator is responsible for ensuring their City Social Media Sites are regularly maintained, reviewing the information posted to the City Social Media Sites to ensure the content is appropriate, professional, and consistent with this Policy, all other applicable City policies and the purpose for which the City Social Media Site exists, and monitoring their City Social Media Site for comments or other interactions. Social Media Administrators shall at all times keep their Department Director informed of the department's social media and networking tools and activities.
- Social Media Administrators are responsible for ensuring that all City Postings on a City Social Media Site are accurate, professionally presented, respectful, relevant, and on topic with the department's mission. Care must be taken to ensure that grammar and spelling are correct. Mistakes must be corrected quickly. Social Media Administrators are also responsible for ensuring that Public Comments posted to a City Social Media Site are consistent with this Policy.
- Social Media Administrators representing the City on City Social Media Sites shall conduct themselves at all times as a professional representative of the City and in accordance with all City policies.

Procedures:

- The establishment of any City Social Media Site shall require approval from the City Manager and/or his designee, the Chief Information Officer, and the requesting Department Director. [Requests to establish a department-specific City Social Media Site](#) must contain an explanation of the business necessity for establishing such a site.
- For City Social Media Sites and tools in existence prior to the effective date of this Policy, departmental Social Media Administrators shall submit a [request for approval](#) for each of their department-specific City Social Media Sites to the Chief Information Officer. Such requests must be submitted within 90 days of the effective date of this Policy, unless an extension is approved in writing by the Chief Information Officer.
- The City Manager and or his/her designee reserves the right to terminate any City Social Media Site at any time without prior notice.

- Social Media Administrators shall utilize official City contact information for account set-up, maintenance, monitoring and access. The use of personal email accounts or phone numbers by any Social Media Administrator is not allowed for the purpose of setting-up, maintaining, monitoring or accessing a City Social Media Site. Social Media Administrators responsible for setting up or maintaining a City Social Media Site(s) shall provide their administrator's access, login, and password information to their Department Director and the IT Department. Any changes in administrator access, login or password information must be reported immediately to the Department Director and IT Department.
- All City Social Media Sites shall adhere to applicable federal, state, and local laws, regulations and policies including, but not limited to, this Policy, and all other Information Technology Policies, Administrative Policies, and City Council Policies. Social Media Administrators shall be required to sign a written statement acknowledging they have read and understand this Policy, and agree to administer all City Social Media Sites accordingly.
- Social Media Administrators' maintenance and monitoring of, and City Postings to, their City Social Media Sites shall be conducted during normal business hours. After-hours or weekend maintenance, monitoring and City Postings shall only be made with advanced approval of the Social Media Administrator's Department Director.
- City Social Media Sites shall comply with usage rules and regulations required by the Social Media Site provider, including privacy policies. All content of, City Postings to, and Public Comments on any City Social Media Site are subject to the Terms of Service (TOS) of the individual Social Media Sites and may be used by the owners of the individual Social Media Site for their own purposes. Social Media Administrators are responsible for reviewing and complying with the individual Social Media Site's TOS.
- City Social Media Sites are subject to the California Public Records Act (Government Code Section 6250, et seq.) and associated laws and policies and must be able to be managed, stored and retrieved to comply with these laws. Any content maintained on a City Social Media Site that is related to City business, including a list of subscribers, posted communication and communication submitted for posting, may be considered a public record and subject to public disclosure as required by law. The IT Department shall process and respond to any request for public records related to City Social Media Sites.
- City Social Media Sites shall be managed consistent with the Brown Act. Public Comments or Public Postings by elected and appointed officials (including, but not limited to responses to, "likes", "shares", retweets or other participation in any published postings or use of a City Social Media

Site or other Social Media Site or any form of electronic communication) for the purpose of discussing, deliberating, or expressing opinions on any issue within the subject matter jurisdiction of the body, which would constitute a serial meeting or is otherwise inconsistent with the Brown Act, shall not be permitted.

- The City reserves the right to restrict or remove any content from its City Social Media Sites that it deems, in its sole discretion, to be in violation of this Policy or any other applicable law or policy (including, but not limited to copyright and/or trademark law), to be the intellectual property of any third party, to pose a threat to the City's technology system or its security. Any content removed based on this Policy shall be retained by the IT Department for a reasonable period of time, including the time and date of the City Posting or Public Comment and the identity of the individual or entity responsible for the City Posting or Public Comment, when available.
- The City Manager may change, modify or amend all or part of this Policy at any time.

Content Guidelines:

- These Content Guidelines shall govern, as applicable, the content of City Postings, posted by Social Media Administrators, as well as Public Comments posted by Commenters.
- All City Social Media Sites shall bear the name, City seal and/or official logo of the City.
- This Social Media Administration and Guidelines Policy shall be displayed to users of City Social Media Sites or made available by hyperlink.
- Each City Social Media Site shall include an introductory statement (where possible) clearly specifying the purpose and topical scope of such site; shall clearly state that such site is maintained by the City and that the site is subject to the City's Social Media Administration and Guidelines Policy.
- Content posted to City Social Media Sites must contain hyperlinks directing users back to the City's Official Website for forms, documents, online services or other information necessary to conduct business with the City, whenever possible.
- Content will use proper grammar and, where possible, avoid jargon. Social Media tools are often more casual than most communication tools, but all City Social Media Sites shall represent the City appropriately and professionally.

- The City shall have full permission or rights to any content posted to a City Social Media Site by the City, including photographs and videos.
- Commenters posting photos warrant that they have taken the photograph and have obtained any necessary permission from any third party if that third party or third party's intellectual property appears in the photograph. Photos remain the property of Commenter, but by posting a photo, Commenter agrees to allow the City to display and use his or her photo on City Social Media Sites and grants the City a perpetual, worldwide non-exclusive license to reproduce, distribute, display and create derivative works of Commenter's photo in connection with the City of Culver City and promotion for the City of Culver City. By posting a photo, Commenter releases and holds the City harmless from any and all liability arising from or related to Commenter's posting of his or her photo(s).
- Any Social Media Administrator authorized to post items on any of the City's Social Media Sites as the City shall not express his or her own personal views or concerns through such City Postings. Instead, City Postings on any City Social Media Site by an authorized Social Media Administrator shall only reflect the views of the City.
- City Postings must contain information that is freely available to the public and not be confidential as defined by any City policy or federal or state law.
- City Postings may NOT contain any personal information, except for the names and titles of and official information relating to employees whose job duties include being available for contact by the public.
- City Postings and Public Comment may contain links to external sites, including other Social Media Sites, that are government sites, City-related sites, sites with specific ties to the City or sites that provide public information that help the City fulfill its mission.
- The City reserves the right to implement or remove any functionality or content of its City Social Media Sites, when deemed appropriate and possible. 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.
- Postings to and Public Comment on City Social Media Sites shall NOT contain any of the following:
 - ❖ Comments not topically related to the particular subject or article being commented upon;

- ❖ Comments in support of, or opposition to, political campaigns, candidates or ballot measures (this does not apply to educational information or materials provided by the City pertaining to City ballot measures or related Public Comment in response thereto);
 - ❖ Profane language or content;
 - ❖ 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/gender identification, as well as any other category protected by federal, state or local laws;
 - ❖ Sexual content (including nudity) or links to sexual content;
 - ❖ Solicitations of commerce, including, but not limited to, advertising of any business or product for sale, commercial promotions and spam;
 - ❖ Conduct in violation of any federal, state or local law, or encouragement of illegal activity;
 - ❖ Information that may tend to compromise the safety or security of the public or public systems;
 - ❖ Content that violates a legal ownership interest of any other party;
 - ❖ Potentially libelous comments;
 - ❖ Personal attacks, insults, or threatening language;
 - ❖ Private or personal information published without consent;
 - ❖ Hyperlinks to material that is not directly related to the discussion.
- Public Comment posted on any City Social Media Site is the opinion of the Commentator only, and publication of a Public Comment does not imply endorsement of, or agreement by, the City of Culver City, nor do such Public Comments necessarily reflect the opinions or policies of the City of Culver City.

Violation/Enforcement:

The City reserves the right to deny access to City Social Media Sites to any individual, who violates this Policy, at any time and without prior notice.

Any employee or other agent of the City found to have violated this Policy may also be found in violation of other applicable City policies pertaining to communications and the use of the Internet and email by employees, may be subject to access termination without prior notice, and/or may be subject to appropriate disciplinary action, up to and including termination of employment, in accordance with applicable laws, rules and procedures. Violation of state and local laws will be referred to the proper authorities.

In addition, any violation may result in the removal and/or suspension of the City's Social Media Site that has been compromised.

Responsible Departments:

- Information Technology Department
- Administrative Services Department
- Office of the City Manager
- Office of the City Attorney

Approved: _____ 

City Manager