



City of Twentynine Palms

ADMINISTRATIVE REGULATIONS SOCIAL MEDIA POLICY

EFFECTIVE DATE

The City of Twentynine Palms declares this document effective as of August 23, 2022.

PURPOSE

This Policy establishes guidelines for the City of Twentynine Palms ("City") use of social media as a means of conveying information about City events, programs and activities. Utilizing social media also enables the City to communicate with the public in a direct and meaningful way. The City has a strong interest and expectation in regulating the information posted on its social media in the name of and on behalf of the City. The purpose of this Policy is to ensure that the City's social media outlets maintain the professional image of the City and meet legal standards. The Policy shall establish oversight, administration and management guidelines for departmental use of social media to further the goals of the City.

SCOPE

This Policy applies to City of Twentynine Palms employees and any other representatives acting on behalf of the City or any of its Departments and Divisions. Where the Policy names City staff, any consultant acting on behalf of the City may be substituted.

All City Social Media Accounts shall comply with City policies and standards, including but not limited to: Email and Internet use, computer use, employee conduct, ethical standards, and conflict of interest, and political activity.

DEFINITIONS

"Elected/appointed City Officials" means City Council Members and people appointed by the Council to serve on an advisory body (e.g., commission, committee, task force).

"Public Information Officer" means a position designated by the City Administrator to have administrative responsibility for implementing, overseeing, and ensuring that the Social Media policy is effectively communicated to and applied by Departments choosing to utilize social media.

"Department Director" means a City employee with the authority to determine and establish social media activity at the department or division program level, appoint staff to manage social media account(s), and periodically monitor use.

"Authorized Employee" means any City employee or employees authorized by a Department Director to post and establish social media presence at the department or division program level.

"Social Media" means publicly accessible technologies used to publish and/or share information using the Internet. Examples of social media include: Facebook, YouTube, Twitter, LinkedIn, Instagram, Pinterest, Nixle, Nextdoor, blogs and OpenGov.

"City Social Media Account" means an account on social media authorized by the City as described in this policy.

"Post" means the addition of information of any kind (e.g., text, links, photos, videos) to social media.

"Public Comment" means a post made in connection with a City Social Media Account by anyone other than an authorized member of City staff.

"Limited Public Forum" means a public forum that is moderated and limited to certain types of speech by the government.

"Speech" means an expression or communication of thoughts or opinions in spoken words, in writing, by expressive conduct, symbolism, photographs, videotape, or related forms of communication.

"User" means any person or entity interacting with a City Social Media Account via Public Comment.

STAFF AUTHORITY

City staff shall operate City Social Media Accounts and post items on behalf of the City to social media only as authorized by the City Manager or his/her designee(s). The City Manager or his/her designee(s) will maintain a list of all authorized City Social Media Accounts, including the log-in information and staff/department(s) authorized to post to those accounts.

ELECTED & APPOINTED CITY OFFICIALS

Elected/appointed City Officials shall not post items on behalf of the City to social media. If elected/appointed City officials have their own personal social media accounts, the City recognizes that they may elect, in their personal capacity, to post items relevant to City business. In such situations, the City's existing rules and practices provide that elected/appointed City officials shall make clear that they are speaking for themselves only, not for the City or for their elected/appointed body. Likewise, elected/appointed City Officials may ask limited questions of City staff to obtain information, but interactions with staff beyond such questions should be directed to the City Manager.

Elected/appointed City officials shall individually ensure they comply with all applicable laws (e.g., free speech laws, the Brown Act, public records laws, Twentynine Palms Municipal Code, etc.). For example, elected/appointed City officials should be careful not to use social media (e.g., "post," "like," "share," "retweet") in a manner that could constitute an improper serial meeting or otherwise violate the Brown Act.

GENERAL GUIDELINES

Staff shall follow these general guidelines when operating/interacting with any City Social Media Account:

1. Limit Posts to dissemination of information about the City;
2. Make clear when a social media account is operated by the City;
3. The City's website (www.29palms.org) shall remain its primary internet presence. Posts shall link to the City's website for detail (e.g., forms, documents, announcements);
4. Posts shall supplement, not replace, legally required notices and standard methods of communication;
5. Posts must be professional, respectful and factual;
6. Posts shall not contain sensitive personal information;
7. Ensure all necessary permissions have been obtained for posts (e.g., photos);
8. Regularly visit and maintain all authorized City Social Media Accounts;

9. Promptly close any City Social Media Accounts that are no longer needed/active (per direction of City Manager or his/her designee).

STAFF RESPONSIBILITY REGARDING PUBLIC COMMENTS

City staff shall configure City Social Media Accounts to allow for public comments, including responses to posts by the City. Such City Social Media Accounts shall be limited public forums moderated by staff.

Public Comments containing any of the following content are deemed inappropriate by the City and shall not be permitted in connection with a City Social Media Account. Posts containing such content are subject to removal and/or restriction by the City:

1. Content unrelated to the City and/or not directly related to the topics of discussion;
2. Violent, pornographic or explicit content;
3. Content promoting discrimination on the basis of race, creed, color, age, religion, sexual orientation, gender, national origin or any other protected class;
4. Content threatening any person or entity with violence;
5. Solicitations of commerce, including but not limited to advertising of any business or product for sale;
6. Violations of any law and/or promotion of illegal activity;
7. Content compromising public safety or security;
8. Content containing profane language;
9. Private or personal information posted without consent;
10. Potentially libelous information;
11. Reproduced or borrowed content that reasonably appears to violate third party rights, intellectual property rights, copyright law or trademark law;
12. Content that poses a threat to the City's technology system or its security.

City staff shall obtain authorization from the City Manager before removing and/or restricting Public Comment based on these guidelines. Any Public Comment removed based on these guidelines shall be retained in a manner consistent with the City's document retention policy.

Any Public Comment posted in connection with a City Social Media Account is solely representative of the opinion of the person or entity who posted the content. The presence of that content in connection with a City Social Media Account shall in no way imply City endorsement of, or agreement with, the content.

When applicable, designated City staff shall respond to comments on City posts when additional information is requested. Appropriate responses will be given on a reasonable timeline, as approved by the Public Information Officer, City Manager, or otherwise designated individual.

BRANDING CONSISTENCY

City social media accounts need to incorporate branding reflective of the City's official brand. The goal of City branding is to create a cohesive, consistent and professional image both visually and in written correspondence. A consistent identity will help build and maintain the City's reputation, strengthen the way audiences see the City and cohesively connect the departments.

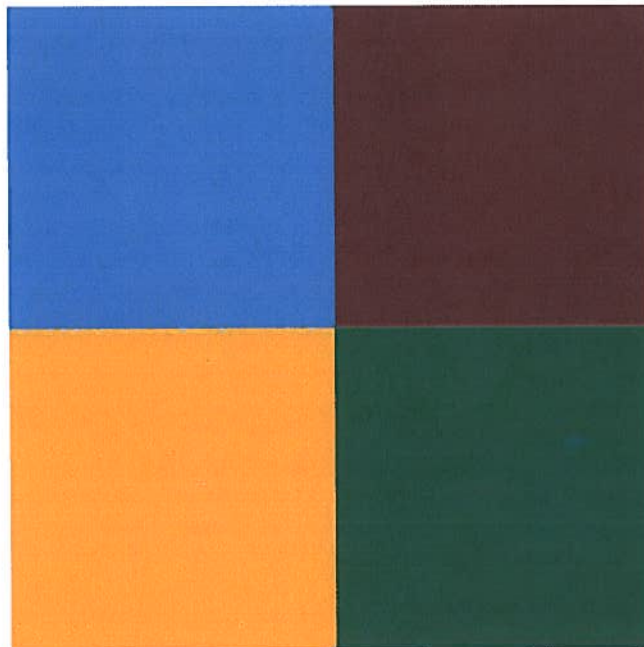
The City seal is an essential cornerstone of the City's branding. On social media, the seal will be used to represent the City without words.

The proper placement or treatment of the seal is essential when drafting a social media post:

- Use proper placement to help eliminate crowding and interference with the seal.
- Avoid stretching or distorting the seal.
- The seal may be made bigger if it remains uniform and proportional.

To ensure the integrity and visibility of the seal, it should be kept clear of competing text, images and graphics. The seal should be given adequate space on all sides when incorporated into a photo.

The social media account's profile picture, header and images within posts must fall in line with the City's official seal and affiliated colors, which also includes black and white:



All posts on official City platforms will include the following:

1. Written caption
 - a. When able, contains a meaningful, clear call-to-action
 - b. Always include a caption to ensure ADA compliance
2. Graphic
 - a. Either original content or legally sourced
 - b. Contains relevant information, as related to the caption
3. When City seal is incorporated, it must adhere to branding standards listed above

CONTENT GUIDELINES FOR PUBLIC COMMENTS/REPLIES

1. Authorized Employees should be aware that it is not always possible or recommended on social media networks to disable the feature that allows or permits responsive posts by members of the public. By permitting use of this feature, the City does not intend to create a general public forum, and all Public Comments and Posts must comply with this Social Media Policy. In addition, most social media networks have their own terms of use and standards of conduct. All content posted on a City Social Media Account must comply with this Social Media Policy and any host site user guidelines. In such an event, the following regulations apply:
 - a. The Authorized Employees for each City Social Media Account that allows public Posts will post the Social Media Policy and make it readily accessible to anyone wishing to post a Public Comment. Any changes to the "terms of use" policy must be approved in advance by the City Manager or City Attorney (or their respective designees).
 - b. To the extent that members of the public are permitted to post content on a City Social Media Account, Authorized Employees should only respond to a Post by a member of the public if they are answering a question or providing direction. All posts responding to a particular Post must be positioned as a response to benefit the entire social media audience or addressing a concern that is being shared. It may not be necessary to respond to every Post.
 - i. The same applies to private Messages by Facebook Messenger or Instagram where a question is being asked. Only answer to those questions that are relevant and make sure the answers are thorough as if you were talking to a public audience. Spam-related messages should be ignored.
 - ii. Timeliness in your response is important: responding within 24 hours is always a good practice, or on a Monday following a weekend post.
 - c. Some authorized social media networks provide the ability to hide or delete posts from the public. If the Authorized Employees wish to hide or delete a Post or Public Comment, they need to coordinate with the City Manager and

possibly the City Attorney. If the Post is to be deleted, there is a documentation process for public records that needs to be followed first. Standard practice for social media is that, once a Post is published, it cannot be deleted. It can be edited as long as it does not change the original intent of the Post.

- d. No Post, Public Comment, or other content shall be removed solely simply because it is critical of the City, its officials, employees or programs, or because City staff disagrees with the viewpoint of the Public Comment, content or submittal.
- e. The Authorized Employee should make a practice of reviewing their assigned City Social Media Account(s) and all associated content not less than once each workday. If the Authorized Employee will be absent for more than one (1) workday for any reason, the Department Director or their designee is responsible for performing the review.

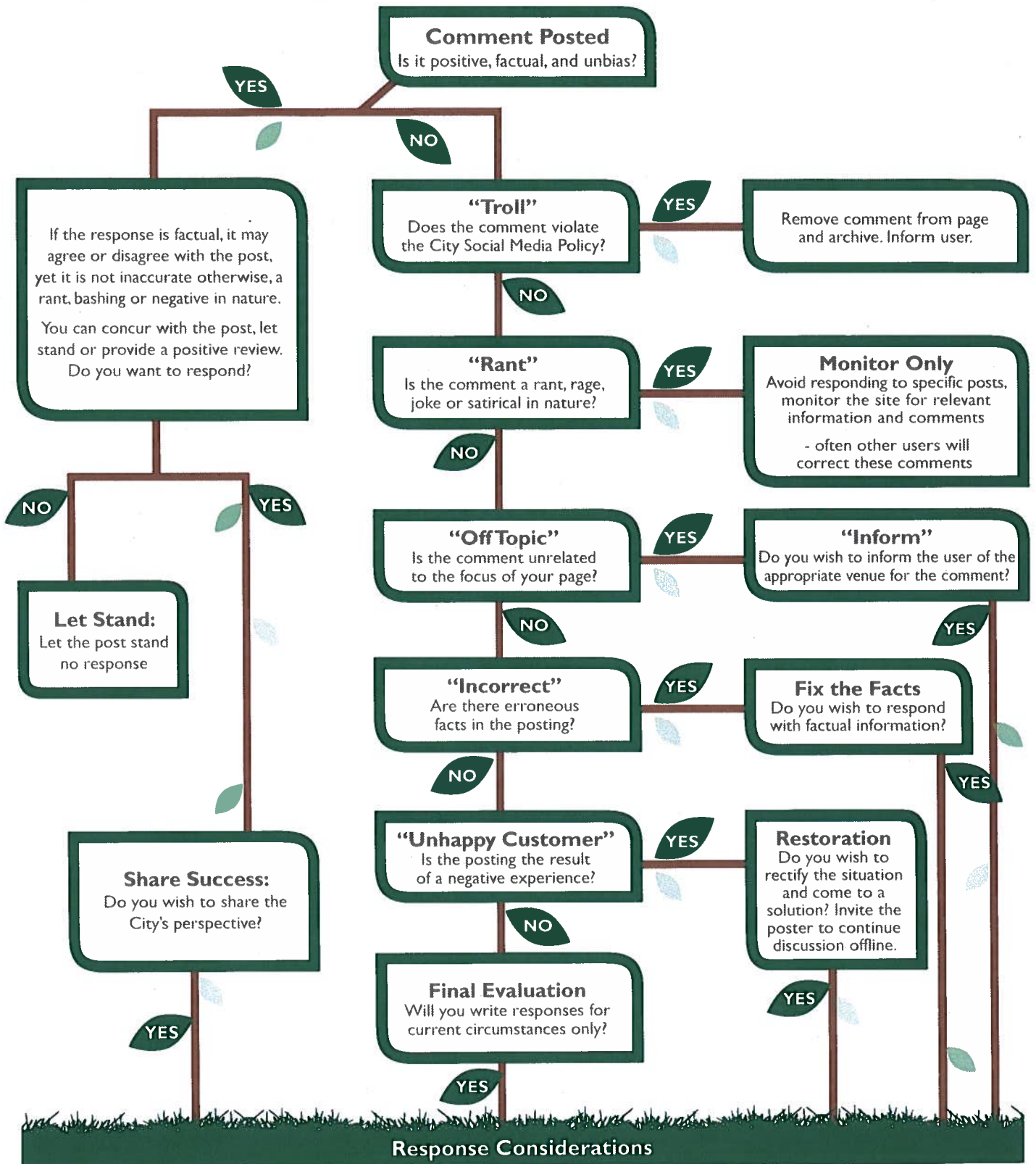
EMPLOYEE ENGAGEMENT ON CITY SOCIAL MEDIA ACCOUNTS

Any Authorized Employees shall review, be familiar with, and comply with the City's Social Media Policy, the social media sites' use policies and terms and conditions and any related guidelines issued by the Public Information Officer, or designee. Authorized Employees posting social media on behalf of their individual departments or division shall also be subject to any more restrictive terms if established by their department or division and such more restrictive terms shall not be limited by this policy.

Postings on any of the City Social Media Accounts sites by an Authorized Employees should only reflect the views or concerns of the City. Any postings made by Authorized Employees on a City Social Media Account will be viewed by the public as coming from the City, and shall reflect an accepted City of Twentynine Palms' voice and validity.

City employees have NO right of expectation of privacy when using City systems. City reserves the right to monitor City Social Media Accounts.

Authorized Employees representing the City government via City Social Media Accounts must conduct themselves at all times as representatives of the City. Authorized Employees shall comply with any applicable City and Department policies. Those that fail to conduct themselves in an appropriate manner shall be subject to appropriate disciplinary actions.



Transparency – Disclose your City connection
Cite Your Source – When you a reference to a law, regulation, policy or other website, where possible provide a link or at a minimum, the cite.

Respect Your Time – Do not spend more time than the response is worth
Use a Professional Tone – Respond in a tone that reflects positively on the City

NO LIABILITY/GUARANTEE

The City operates its Social Media Accounts as a public service to provide information about the City. The City assumes no liability for any inaccuracies its Social Media Accounts may contain and does not guarantee its Social Media Accounts will be uninterrupted, permanent or error-free. All users of Social Media should review and understand all applicable privacy and other policies, including those established by third parties.

DISCLOSURE

This policy shall be available from the City Clerk.

RECORDS

All posts associated with City Social Media Accounts shall be treated as public records subject to public disclosure under the California Public Records Act. City staff should consult with the City Clerk and City Attorney for guidance regarding current requirements governing records retention and disclosure.

REVISIONS

This policy may be revised by the City Manager at any time.

Approved By: _____



Frank J. Luckino, City Manager

Date: August 23, 2022