CITY OF BEVERLY HILLS

DEPARTMENT OF PUBLIC WORKS & TRANSPORTATION

MEMORANDUM

TO:	Public Works Commission
FROM:	Christian Di Renzo, Sr. Management Analyst
DATE:	November 8, 2012
SUBJECT:	Discussion of the City's social media policy
ATTACHMENTS:	Social Media Policy

Staff has invited Ms. Huma Ahmed, Community Outreach Manager, to discuss the City's social media policy and provide broad context with respect to the Public Works & Transportation Department's outreach and marketing initiatives.

City of Beverly Hills
Social Media Policy

1.0 Purpose

The purpose of this policy is to address the quickly growing and changing landscape of the Internet, which also covers the use of Social Media or "Web 2.0." These changes have affected the means by which residents communicate and obtain information online. Departments within the City of Beverly Hills ("City") may consider using social media tools to reach a broader audience. The use of social media outlets is encouraged to further the goals of the City and the objectives of its departments, where appropriate.

Although beneficial, the use of social media presents challenges. This policy establishes a city-wide social media policy intended to address those challenges and guide all City of Beverly Hills social media usage.

This policy applies to all City Departments and all City employees who use social media sites and/or technology on behalf of the City. All preexisting and proposed social medial websites and online community accounts created by City employees on behalf of the City during the course and scope of their employment are subject to this policy.

2.0 General Information

2.1 The City has an overriding interest and expectation in deciding what is "spoken" on behalf of the City on the internet, and specifically on Social Media Sites. This policy establishes guidelines for the use of social media.

2.2 Any posting to a City Social Media Site will be done only with the approval of the Deputy City Manager of Public Affairs or his/her designee.

2.3 Information posted by the City on City Social Media Sites will supplement, and not replace, required notices and standard methods of communication.

2.4 City Social Media sites are subject to the California Public Records Act. 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, subject to public disclosure, and subject to the City's document retention schedule.

2.5 The best and most appropriate City use of Social Media Sites falls generally into three categories: 1) Methods for disseminating time-sensitive information as quickly as possible (*e.g.*, emergency information); 2) Marketing/promotional outlets which increase the City's ability to broadcast its messages to the widest possible audience; and 3) Establishing focus groups for specific audiences pertaining to City services.

3.0 Definitions

City Social Media Sites. City Social Media Sites means Social Media Sites which the City establishes and maintains accounts, and over which it has control over all

postings, except for advertisements or hyperlinks by the Social Media Site's owner, vendors or partners. City Social Media Sites shall supplement, and not replace, the City's required notices and standard methods of communication.

Social Media. Social Media are primarily Internet-based tools that allow users to create, edit, organize, comment upon, discuss and share information. The public interaction on these sites and the resulting community-generated content is commonly referred to as web 2.0. There are many social media venues, and new venues appear frequently. The social media venues listed below have been approved for City use, and the Deputy City Manager of Public Affairs or his/her designee may authorize the use of additional social media venues that are similar to the venues listed below:

Facebook - a social networking site, www.facebook.com, that is useful for promoting programs, activities, projects, and events.

Twitter - a micro-blogging tool that allows account holders at www.twitter.com to text ("tweet") up to 140 characters of information to followers. Using Twitter accounts, the City can communicate announcements, news, traffic alerts, etc. directly to followers and direct them to City websites for more in-depth information.

Vimeo – a video sharing site at www.vimeo.com that is useful for delivering public service announcements and program information.

YouTube - a video sharing site at www.youtube.com that is useful for delivering public service announcements and program information.

Flickr - an image and video hosting website, web services suite, and online community platform.

Posts or Postings. Post or postings mean information, articles, pictures, videos or any other form of communication posted on a City Social Media site.

4.0 Procedures

4.1 Creating Department or Other Social Media Sites

4.1.1 The Deputy City Manager of Public Affairs or his/her designee will manage and oversee all content on each City Social Media Site to ensure adherence to the Social Media Policy, including appropriate use, message and branding that is consistent with the goals and objectives of the City of Beverly Hills.

4.1.2 Prior to creating a Social Media Site, departments should consider the need and value of a department- or program-dedicated site versus relying on the City-wide site or City website to disperse department or program information. Since Social Media Sites lose the interest of their audiences when not updated regularly, department staff should calculate the time and effort it will take to maintain a site so that visitors continue to find value over time. As a rule of thumb, Social Media Sites should be updated at least once per week.

4.1.3 Departments must obtain approval from the Deputy City Manager of Public Affairs or his/her designee prior to creating a Social Media Site.

4.1.4 All City Social Media Sites shall utilize authorized City contact information for account set-up, monitoring and access, which shall be provided by the City's Information Technology Department. 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.

4.1.5 The Deputy City Manager of Public Affairs or his/her designee will review department requests to establish Social Media Sites and has the sole authority to establish and/or terminate City accounts and pages.

4.1.6 Once approval is received from the Deputy City Manager of Public Affairs or his/her designee, the department must use the common Social Media Site format and guidelines to create the Social Media page in order to ensure appropriate information is posted and to maintain consistency with other City Social Media Sites. Any variation from common format requires prior approval from the Deputy City Manager of Public Affairs or his/her designee.

4.1.7 Each Department Head, where applicable, shall appoint a specific staff member(s) to maintain and monitor the Social Media Site. Department Heads are responsible for ensuring their staff follows the procedures set forth in this Social Media Policy. If a staff member assigned to maintain and monitor a Social Media Site ceases to be an employee of the City, the Department Head shall immediately contact the Deputy City Manager of Public Affairs or his/her designee, and the Chief Information Officer to ensure that password(s) are revised and other appropriate actions are taken.

4.1.8 Those designated and authorized to utilize Social Media are responsible for regularly posting information, monitoring comments, removing any prohibited content as set forth in this policy and saving content required under the Public Records Act as described herein. All log-in information, including passwords, shall be provided to the Deputy City Manager of Public Affairs or his/her designee for each City Social Media Site.

4.1.9 The Deputy City Manager of Public Affairs or his/her designee shall maintain a list of all City Social Media Sites, including login and password information, to allow for the immediate alteration or removal of content that is inappropriate or inconsistent with this Social Media Policy.

4.1.10 The Deputy City Manager of Public Affairs or his/her designee will monitor the City's Social Media Sites and their content to ensure adherence to the City's Social Media Policy and all other City policies.

4.1.11 The City shall not create a City Social Media Site on any Social Media website that does not provide a mechanism for a designated employee to remove posts that violate City policy.

4.1.12 The City reserves the right to terminate any City Social Media Site at any time without notice.

4.2 Information Posted on Social Medial Sites—City Posted Information

4.2.1 Those designated and authorized to utilize Social Media are responsible for complying with applicable federal, state, and local laws, regulations, and policies. This includes adherence to established laws and policies regarding copyright, records retention, Public Records Act, First Amendment, privacy laws, acceptable use of City owned or controlled digital equipment, Internet access, and information security policies established by the City of Beverly Hills.

4.2.2 Those designated and authorized to utilize City Social Media Sites are representing the City of Beverly Hills via Social Media Sites and must conduct themselves at all times as representatives of the City of Beverly Hills.

4.2.3 Those designated and authorized to post on City Social Media Sites shall not express their own personal views or concerns through such postings. Instead, postings on any of the City's Social Media Sites shall reflect the views of the City.

4.2.4 The City of Beverly Hills website (www.beverlyhills.org) will remain the City's primary and predominant internet presence. Wherever possible, content posted to City Social Media Sites will also be available on the City's main website. Content posted on City Social Media Sites should contain links directing users back to the City's official website for in-depth information, forms, documents, or online services necessary to conduct business with the City.

4.2.5 Information posted to City Social Media Sites becomes public information and there should be no expectation of privacy in regards to the information posted on these sites.

4.2.6 All City Social Media Sites shall clearly indicate that they are maintained by the City and shall prominently display City contact information. Branding the City's social media pages as "the official site of the City of Beverly Hills" is required. All City-maintained Social Media pages shall include the Beverly Hills Shield Design Mark and the following language: "This is the official (Facebook, Twitter YouTube, etc.) page for the City of Beverly Hills, Department Name, California."

4.2.7 Where possible, City Social Media Sites shall clearly indicate that content posted or submitted for posting on the site is subject to public disclosure. The following language should be clearly visible on the wall page: "The City of Beverly Hills' page is to provide general public information only. Should you require a response from the City of Beverly Hills or wish to request City services, you must go to www.beverlyhills.org or call the City at (310) 285-1000. Any comments submitted to this page are public records subject to disclosure under California law."

4.2.8 City Social Media Sites shall clearly indicate that emergency responders are not monitoring City Social Media Sites and the following language shall be clearly visible on the wall page: "This site is not actively monitored by City of Beverly Hills emergency personnel. If you have an emergency or need emergency assistance, you should call 911."

4.2.9 All information posted to City Social Media Sites on the City's behalf must:

- Directly pertain to City of Beverly Hills sponsored or City endorsed programs, services and events;
- Present the City in a positive light and a professional manner;
- Contain information that is freely available to the public and not be confidential as defined by any City policy or local, state or federal law;
- Not contain any personal information except the names of employees whose job duties include being available for contact by the public;
- Not include content that is contrary or detrimental to the City's mission, values, image and interests;
- Not contain religious messages or advocate or promote religious beliefs;
- Not contain content in support of, or in opposition to, any political candidate or ballot measure;
- Comply with all local, state, and federal laws;
- Not contain profane language or content;
- Not contain sexual content or links to sexual content;
- Not contain content that promotes, fosters or perpetrates discrimination on the basis of race, creed, color, age, religion, gender, marital status or status with regard to public assistance, national origin, physical or mental disability or sexual orientation, as well as any other category protected by federal, state or applicable local laws; and
- Not contain solicitations of commerce or conduct or encourage illegal activity.

4.2.10 Employees administering a City Social Media Site on behalf of the City of Beverly Hills are expected to understand the current terms of service for that site.

4.2.11 The City shall have full permission or rights to any content posted by the City, including photographs and videos. City Staff shall obtain waivers from any person who appears in a photo that is posted by City Staff to a City Social Media Site.

4.2.12 Violation of these standards may result in the removal of City pages from the social media outlets and may cause disciplinary action to be taken as determined by the City Manager or his/her designee in compliance with the City's Personnel Rules and Regulations.

4.2.13 A Comment Policy Notice must be displayed on all City Social Media Sites that allow posts, indicating that the discussion is moderated and inappropriate content will be removed, to read as follows: "Comments posted to this page will be monitored. The City of Beverly Hills reserves the right to remove any comment that violates the City of Beverly Hills Social Media Policy, including but not limited to comments that: contain profane, obscene, or pornographic language or content; threatens or defames any person or organization; supports or opposes political candidates or ballot measures; promotes illegal activity; violates federal, state, or local laws; promotes discrimination on an unlawful basis; or discusses topics not related to the particular issue or subject discussed on the City's Social Media Site."

4.2.14 Authorized users shall be provided a copy of this Social Media Policy and are required to acknowledge their understanding and acceptance by signing and dating the last page of this document and returning the original copy to the Deputy City Manager of Public Affairs or his/her designee and retaining a copy for their records.

4.2.15 City Social Media Sites may contain content, including but not limited to, advertisements or hyperlinks over which the City has no control. The City does not endorse any hyperlink or advertisement placed on City Social Media Sites by the Social Media Site's owners, vendors or partners.

4.3 Information Posted by Outside Individuals

4.3.1 Posted content (including comments, photos, and links) must be related to the topic posted by the City or will be removed.

4.3.2. Comments containing any of the following inappropriate forms of content shall not be permitted on City of Beverly Hills Social Media Sites and shall be removed by the Deputy City Manager of Public Affairs or his/her designee:

a. Comments unrelated to the original topic or article;

b. Comments in support of, or in opposition to any political campaigns or ballot measures;

c. Profane, obscene or pornographic language or content or links to such language or content;

d. Solicitations of commerce, including but not limited to advertising of any business or product for sale, except for information posted by businesses that have a business license issued by the City and/or a store-front or office space in the City;

e. Content that conducts or encourages illegal activity;

f. Any information that is illegal to disseminate or that might compromise the safety or security of the public or public systems;

g. Content that violates a legal ownership interest, such as a copyright, of another party;

h. Defamatory statements;

i. Threats of violence or injury to any person, property, or organization;

j. Content that violates any federal, state or local law;

k. Content that promotes, fosters, or perpetuates discrimination on the basis of race, color, creed, sex, age, religion, national origin or ancestry, physical or mental disability, veteran status, parentage, marital status, medical condition, sexual identity, sexual orientation, as well as any other category protected by federal, state, or local laws.

4.3.3. Comments on topics or issues not within the legislative jurisdiction of the City of Beverly Hills shall be removed.

4.3.4 If comments do not otherwise violate this policy, then the content should be allowed to remain, regardless of whether it is favorable or unfavorable to the City of Beverly Hills.

4.3.5 A comment posted by a member of the public on any City Social Media Site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of or agreement by the City of Beverly Hills, nor do such comments necessarily reflect the opinions or policies of the City of Beverly Hills.

4.3.6 The City of Beverly Hills reserves the right to remove any content that is deemed to be in violation of this Social Media Policy or any applicable law.

5.0 General Social Media Guidelines

Social media offers a new model for public interaction, but like much of the content on the Internet, it is not necessarily secure or accurate, and the benefits it provides, such as facilitating the sharing of useful information and fostering increased public engagement, are not without challenges.

City staff must follow the City's procedures set forth in Section 4. In addition, Staff should abide by the following additional guidelines, which are meant to help employees who use Social Media on the City's behalf address the challenges while maximizing the benefits of these developing technologies.

5.1 Be transparent and truthful - Your honesty, or dishonesty, will be quickly noticed in the social media environment. Always be careful and considerate. Once the words are out there, you cannot take them back.

5.2 Be timely - The employee should review the web page at least once each workday to ensure that comments and content are current and accurate.

5.3 Be cautious - Make sure your efforts are transparent and do not violate the City's privacy, confidentiality, and legal guidelines. Do not publish any material that is confidential. Never comment on anything related to legal matters or personnel issues without first consulting with the Deputy City Manager of Public Affairs or his/her designee. Also, protect your own privacy. What you publish is widely accessible and will be around for a long time, so consider the content carefully.

5.4 Perception trumps reality - In online social networks, the lines between public and private, personal, and professional are blurred. By identifying yourself as a City employee, you are automatically creating perceptions about the City and your expertise.

5.5 Be judicious - use good judgment in responding to a post. Engaging any person posting in an argumentative or offensive manner should be avoided. If such a comment warrants a response, take the conversation off-line. When in doubt, ask your Department Head or the Deputy City Manager of Public Affairs or his/her designee.

5.6 Be responsible – What you write is ultimately your responsibility so treat it seriously and with respect.

5.7 Admit mistakes - If you make a mistake, admit it, be upfront and quick with your correction, and notify your Department Head and the Deputy City Manager of Public Affairs or his/her designee.

5.8 Be thoughtful - If you are about to publish something that makes you even slightly uncomfortable, take a minute to review this policy and try to figure out what is bothering you. If you are still unsure, consult your Department Head or the Deputy City Manager of Public Affairs or his/her designee.

6.0 Records Management and Requests for Information

6.1 Under certain circumstances, content appearing on the City's Social Media Sites may be subject to the California Public Records Act ("Act") and subject to disclosure by the City if requested. Accordingly, the City's use of Social Media shall be documented and maintained in an easily accessible format that tracks account information and preserves items that may be considered a record subject to disclosure under the Act or required to be retained pursuant to the Government Code.

7.0 Terms of Service

Each type of Social Media used by the City maintains a "Terms of Service" agreement ("Terms"). All comments posted to any City of Beverly Hills Social Media Site are bound by these "Terms" and the City of Beverly Hills reserves the right to report any user violation.