

# Administrative Instruction Section II No. #21

#### OFFICE OF THE CITY MANAGER

## Social Media Policy

Supersedes:

February 3, 2014

Effective Date:

September 15, 2025

#### A. Purpose

The City has an overriding interest and expectation in deciding what is "spoken" on behalf of the City through the use of Social Media. This Administrative Instruction ("Al" or "Policy") establishes policies for the establishment and use of Social Media by the City as a means of conveying information about the City and its events and activities to its residents.

This Policy also sets forth the City's interest and expectations regarding Employees' use of Social Media. This Policy applies to all employees (including full-time, part-time, contract, temporary, hourly, and seasonal employees), officials, consultants, contractors, volunteers, and other individuals who are granted access to the City's website, electronic communications, City network, and/or Social Media.

Employees are encouraged to consult with their supervisor(s) regarding any questions arising from the application or potential application of this Policy.

Nothing in this policy shall be applied to prohibit or infringe upon any communication, speech, or expression that is protected or privileged under law. This includes speech and expression protected under state or federal constitutions as well as labor laws or other applicable laws. Nothing in this policy shall be applied to deny any Employee their right to engage in protected rights with other Employees regarding working conditions or the terms and conditions of employment.

#### B. Definitions

The following definitions shall apply to this Policy:

- 1. "Employee[s]" include all Employees who work for the City, including full-time, part-time, contract, temporary, hourly, and seasonal employees), officials, consultants, contractors, and volunteers.
- 2. "Social Media" and "Social Media Sites" are understood to be Content created

by individuals using accessible and variable technologies through the Internet which include social networks, blogs, video sharing, podcasts, wikis, links, message boards, and online forums. Current technologies include: picture-sharing, wall-postings, e-mail, instant message, and music-sharing to name a few. Examples of Social Media applications include, but are not limited to, Wikipedia (reference), Facebook (social networking), RSS (web feed), YouTube (video sharing), Instagram (photo and video sharing), X (formerly known as Twitter, social networking and microblogging), Threads (Instagram's microblogging app), Linkedln (business networking) and news media comment sharing/blogging.

- **3.** "Blogs or Blogging" includes any electronic medium or platform, whether maintained by the Employee or by other persons, in which viewers share information and/or opinions.
- 4. "Comment or Comments" means a response to a municipality's posting or Social Media content or posting submitted by a commenter, and includes information, articles, pictures, videos, or any other form of communicative content posted or shared on Social Media Sites.
- **5. "Commenter"** is a municipal Employee or official or a member of the public who submits a comment for posting in response to the content of a particular City posting or Social Media content.

## C. General Policies

All City Social Media Sites must contain the following information:

- 1. Making clear that the City Social Media Sites are maintained by the City and that they follow this Social Media Policy.
- 2. The City's website at <a href="www.ssfca.gov">www.ssfca.gov</a> will remain the City's primary and predominant Internet presence.
- 3. To the extent possible, the use of Social Media will link back to the City's website for forms, documents, online services and other information necessary to conduct business with or utilize the services of the City.

The establishment and use by any City department of City Social Media Sites is subject to prior approval by the City Manager or their designee. Following approval by the City Manager's Office, proper use of Social Media shall be the responsibility of the Department sponsoring the Site.

A Department-designated coordinator(s) will be responsible for monitoring content on Department-specific or City Activity/Event/Project-specific Social Media Sites to ensure adherence to this Policy. In approving the use of a City Social Media Site, the City Manager's Office or their designee, in coordination with any City Department as may be needed, may establish Site--specific guidelines for the use of a Social Media Site, including but not limited to approved use of City logos, a specific purpose of the Site, which may include the dissemination of general information about the City or the dissemination of information regarding a specific City Department or City Activity, Event or Project.

This Social Media Policy may be revised at any time.

## D. Monitoring of Social Media Content

It shall be each authorized Department-designated coordinator's responsibility to maintain their respective Social Media Site and monitor content published to the Site. The City's content requirements must be displayed to users or made available by hyperlink.

All authorized Department-designated coordinators must either: 1) set the Social Media Site so that all comments must have prior approval before being posted to the Site, or 2) monitor the content, including comments, of the Site at least once every forty-eight (48) hours. Failure to properly monitor the Site may result in loss of authority to manage a City-sponsored Social Media Site and/or removal of the Social Media Site altogether.

The City reserves the right to restrict or remove any content that is deemed in violation of this Policy or any applicable law. Any content removed based on these guidelines must be retained by the Department's coordinator for two years, including the time, date, and identity of the poster, when available. The Department shall follow any applicable requirements of the City's document retention policy for retaining content.

Nothing in this Policy is intended to prohibit or infringe upon any communication, speech, or expression that is protected or privileged under law. This includes speech and expression that is protected under state or federal law.

## **Content Guidelines**

- 1. City Social Media Sites content shall only pertain to City-sponsored or City-endorsed programs, services, and events. Approved content includes, but is not limited to, information, photographs, videos, and hyperlinks.
- 2. City Content posted to City Social Media Sites must contain hyperlinks 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 whenever possible.
- 3. The City shall, at all times, have full permission or rights to any content posted by the City, including photographs and videos.
- 4. Any employee authorized to post items on any of the City's Social Media Sites shall review, be familiar with, and comply with the respective Social Media Site's use policies and terms and conditions.
- 5. Any employee authorized to post items on any of the City's 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 by an authorized City employee shall only reflect the views of the City.
- 6. Postings must contain information that is freely available to the public and not be confidential as defined by any City policy, state, or federal law.
- 7. Postings may not contain any personal information, except for the names of employees whose job duties include being available for contact by the public.

## **Unauthorized Comments**

## 1. Off-Topic Content

Comments not related to the business of the City (or a specific department, if applicable), or not relevant to the original topic of discussion; this includes hyperlinks to unrelated material.

## 2. Violent, Obscene, or Graphic Material

Content that is violent, profane, obscene, or pornographic; includes graphic depictions of violence, mutilation, dismemberment, or disfigurement of humans or animals; or contains any matter prohibited under Chapter 7.5 (beginning with Section 311) of Title 9, Part 1 of the California Penal Code.

## 3. Hate Speech and Discrimination

Content that promotes, fosters, or perpetuates discrimination or harassment on the basis of race, creed, color, age, religion, gender, gender identity, sexual orientation, national origin, or any other protected class.

## 4. Threats, Defamation, and Harassment

Content that threatens, defames, or harasses any person or organization, or holds individuals or groups up to public ridicule, embarrassment, or derision.

## 5. Incitement or Endorsement of Illegal Activity

Content that promotes, encourages, or appears to encourage illegal or unlawful behavior, goods, or services, or includes conduct in violation of any federal, state, or local law.

## 6. Political Campaigning

Content that supports or opposes (or appears to support or oppose) any ballot measure, referendum, initiative, or candidate for elected office.

## 7. Religious Advocacy

Content that advocates for or against any religion or religious belief.

## 8. Promotion of Adult-Oriented Material

Content that promotes or appears to promote adult films (rated X or NC-17), sexually explicit video games (rated A or M), adult entertainment venues, escort services, or other adult-related goods or services.

## 9. Commercial Solicitation or Spam

Content that solicits commerce, advertises or promotes a non-governmental event, business, or product for sale; includes spam, junk mail, chain letters, pyramid schemes, or other promotional materials—unless providing support to official City programs or services.

## 10. Security and Privacy Violations

Content that may compromise the safety, security, or privacy of the public, City staff, or City systems, including the unauthorized release of personal or confidential information.

## 11. Copyright or Intellectual Property Violations

Content that infringes on legal ownership rights, such as copyrights or trademarks, of any party.

#### 12. Malicious Software

Posts or links that contain malware, such as viruses, worms, trojans, rootkits, spyware, adware, or any other unwanted software.

## 13. Employee Conduct

Employees are prohibited from posting material related to their employment with the City that constitutes harassment, hate speech, libel, or disruption to the workplace. Such content is subject to immediate removal and may result in disciplinary action.

## Reporting/Removal of Unauthorized Comments

The City requires that Department-designated coordinators immediately notify the City Manager's Office if there is any posted material that may be inappropriate, that violates this Policy, or any City policy, is illegal, or that potentially infringes the copyrights or other rights of any persons. The City Manager's Office will investigate and respond to all reports of potential violations of this Policy.

Any content removed based on these guidelines must be retained by the sponsoring Department for two years, including the time, date, and identity of the poster, when available. Upon removal of content, the coordinator shall notify the commenter that their response has been deemed inappropriate and removed due to inconsistency with the City's content requirements.

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

## E. Employee Use of Social Media

When using Social Media, whether on a City device, (computer, phone or tablet), or on a personal device, Employees shall comply with all applicable City rules, policies, practices, or operational guidelines including, but not limited to those prohibiting discrimination, retaliation, sexual harassment, breach of confidentiality, and defamation.

When using any internet Site or social networking Site, whether City-owned or personal, Employees shall not post any information that divulges confidential information or the internal operations or procedures of the City, or any personal, identifying information, home phone numbers or home addresses, with regard to any services rendered by the City, or any member of the public receiving such services, unless specifically authorized by that individual.

City logos and graphics are the property of the City and may not be used in any way on personal Social Media Sites.

When a City employee comments or responds to a comment, in their capacity as a City employee, said comments or responses shall be made only from an official account established by the City for such purposes. No City employee making comments or responses in his or her capacity as a City employee shall share personal information about himself or herself, or other City employees, government officials, or members of the public.

When using Social Media on behalf of the City, or on City devices or networks, or while on duty, City Employees shall comply with the following:

- 1. Employees shall comply with City rules, policies, practices, or operational guidelines related to message retention, use of passwords, system availability, back-up procedures, and calendaring.
- 2. Employees are expected to use the City's internet Sites and social networking Sites solely for legitimate business purposes on behalf of the City in a manner consistent with this policy and any other applicable Administrative Instructions.
- 3. City personnel are discouraged from posting any work-related complaints or specific grievances regarding the City's elected officials, management, and supervisory staff of the City but are requested to instead use the procedures in place for complaints as set forth in the City's Personnel Rules or applicable Memorandum of Understanding. Nothing in this policy shall be applied to deny any Employees their right to engage in protected activity with other Employees regarding their working conditions or the terms and conditions of employment, or to infringe on any communication, speech, or expression that is protected under law.
- 4. Wherever practical, employees will verify facts, cite sources, present balanced views, acknowledge and correct errors, spell check, and check grammar before publishing any content.

Employees are reminded that even on personal accounts, their social media presence may be perceived as connected to the City, and we encourage mindfulness and professionalism when posting online.

## F. No Expectation of Privacy

As with any use of the Internet, Employees are advised that they should have **no expectation of privacy or confidentiality** while using the City's Social Media networking Sites, networks, or computers. Subject to any restrictions imposed by state and/or federal law, such Employee postings can be reviewed by anyone, including the City. The City may monitor comments or discussions about the City, its managers, Employees, or agents posted on the Internet by anyone, including Employees and non-Employees. The City reserves the right to use content-management tools to monitor, review, or block content on the City Social Media Sites that violate the City Employees' Use of Social Media policy.

## **G.** Identification as an Employee of the City

Employees who use or are members of social networking Sites, music and movie collaboration Sites, and blogs are hereby on notice, by receipt of this policy, that by identifying themselves on these websites as City Employees, they are also to some extent identifying themselves as representatives of the City. As such, all Employees who list the City as their employer on these

social networking Sites, blogs, or collaboration websites should take responsibility for representing the City in a professional manner. The City encourages Employees **not to list** the City as their employer when making posts to internet Sites and/or blogs or similar websites.

## H. Records Management and Requests for Information

City Social Media Sites are subject to the California Public Records Act. Any content maintained in a Social Media format that is related to City business, including a list of subscribers, posted communication, and communication submitted for posting, may be a public record subject to public disclosure. 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 California Public Records Act or required to be retained pursuant to the Government Code.

In addition, the City Social Media Sites shall be managed consistent with the Brown Act requirements. Members of City Council, Commissions and/or Boards shall not respond to published postings, blog or otherwise use a Social Media Site to engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body.

## I. Terms of Service

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

#### J. Acknowledgment

Upon request, City Employees must sign a written acknowledgment (Attached as Appendix A to this Policy) that they have received, read, understand, and agree to comply with the City's Employees' Use of Social Media policy.

#### **K.** Violations of City Policy

- 1. Any employee with knowledge about the misuse of Social Media in any manner shall report incidents immediately to their supervisor, Department Head, the City Manager's Office, and the Director of Human Resources.
- 2. The City prohibits retaliation or adverse employment action against any Employee for reporting a possible violation of this policy or for participating in an investigation regarding a possible violation of this policy. Any Employee who retaliates against another Employee for reporting a possible violation of this policy may be subject to disciplinary action, up to and including termination.
- 3. Violation of the City's policy regarding the use of Social Media may result in disciplinary action, up to and including termination.

## Contact for this Policy

• Communications Manager

Sharon K. Rana 3

• City Manager

Sharon K. Ranals City Manager

Dated: September 15, 2025

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