

## CITY OF GEORGETOWN

### SOCIAL MEDIA POLICY

*Issued: Aug. 24, 2021*

#### **A. PURPOSE**

The role of technology in the 21<sup>st</sup> century workplace is constantly expanding. Social media tools, like Facebook, Twitter, and Instagram, can improve interactivity between government agencies and the public, reaching new and different populations from traditional media sources. Additionally, social media sites have become popular means of information exchange for City employees.

The City of Georgetown recognizes the importance of the internet in shaping the public opinion of our City, along with its current and potential services, elected officials, employees, business partners, visitors, and residents. This policy is intended to assist appointed staff members, elected officials, and City employees in the use and management of social media, in both their official and personal capacities.

Specifically, this policy informs social media use for the following:

- **Personal accounts of City employees**
- **Official accounts of the Mayor and City Council**
- **Authorized accounts for the City of Georgetown**

The City of Georgetown endorses the secure use of authorized social media accounts to enhance communication, collaboration, information exchange, and public engagement, education, and awareness. Official City of Georgetown communication tools, including social media, should be used in ways that provide clear communication, maximize transparency, encourage engagement, foster trust, maintain the security of the City network, and are in keeping with the City's professional standards.

This policy will be reviewed on a regular basis to ensure all City social media practices continue to uphold the goals of the City.

#### **B. DEFINITIONS**

**Authorized accounts** are social media accounts created and maintained by, for, or on behalf of the City of Georgetown, and which involve **City business**. Authorized accounts shall bear the official title of any City of Georgetown department, division, service area, or employee that maintains the account. Authorized accounts must be archived and are subject to open records requests. *See PROFESSIONAL USE* section

**Authorized agent** is any City employee (including, but not limited to, elected officials and public information officers) who has been authorized to post to authorized or official social media accounts on behalf of a City of Georgetown elected official, department, or service area.

**City business** refers to subject matter of social media posts that satisfies both criteria below:

- 1) The posts directly relate to the City (e.g., City programs, initiatives, work, services, and other, similar activities); and
- 2) The City employee posts to the page as part of his or her job.

**Official accounts** are social media accounts of the Mayor and City Council, which are created and administered by the City of Georgetown to communicate with members of the City Council district and conduct other City business. City staff not working for Mayor or Council offices will not be responsible for content creation or day-to-day management. *See ADDITIONAL REQUIREMENTS FOR ELECTED OFFICIALS below.*

**Personal accounts** are social media accounts maintained and managed by City of Georgetown employees for their own, personal use and that are not affiliated with, sponsored by, or directly associated with the City. Employees who identify, or can be identified, as City of Georgetown employees are advised to follow the requirements laid out in the “Personal Use” section of this policy.

*See PERSONAL USE section.*

**Records management** refers to the requirement that all social media content be archived to ensure compliance with state and federal records retention and open records laws.

**Social media** refers to online technologies used to communicate, share information, and listen to public feedback. This includes (but is not limited to) third-party pages such as Facebook and Twitter, but that is not an all-inclusive list. Social media are used as communications tools to amplify City information, including emergency alerts, public engagement opportunities, and general awareness of City news and services.

**Social Media Action Plan** is an official document that departments are required to complete before creating new City of Georgetown social media pages. It outlines key questions related to the use of social media, including target audience, goals, and resources. The action plan must be approved by the Communications and Public Engagement Department prior to creating a new account.

## **C. CONFIDENTIALITY**

Confidential City information may not be shared on any social media channel. This includes information subject to copyrights or other licensing agreements, information referenced or discussed at closed City Council meetings, contract evaluation reports prior to award, and all other information that is exempt from disclosure under the Texas Public Information Act. City employees may not divulge confidential City information on any social media account or page, whether as a City employee, as an authorized agent, or as a private citizen.

## **D. LEGAL LIABILITY**

All employees must recognize that they and the City may be liable for anything written or posted online. This includes, but is not limited to, commentary, content, or images that are defamatory, pornographic,

confidential, proprietary, harassing, libelous, in violation of copyright laws, or that creates a hostile work environment.

## **E. PRIVACY POLICY**

The City of Georgetown, as a government entity, conducts public business, and its records are generally available for public review. Nevertheless, the City is committed, to the extent allowable by law, to protect and secure your personal information contained in City records. Third-party social media platforms, like Facebook and YouTube, have their own privacy policies. Please refer to the privacy policies of any social media platform used for more information, as you are no longer on a City website and are subject to the privacy policy and conditions of that website.

## **F. PERSONAL USE**

City of Georgetown employees may access their personal accounts at work for limited personal communications, as long as it does not interfere with job duties.

When creating and using personal accounts, employees are prohibited from:

- Using a City of Georgetown email address (i.e., creating a personal Facebook or Twitter account using their georgetown.org email address);
- Using a brand, logo, emblem, or other City identifiers, such as the Script G or official uniform, without posting a disclaimer in their profile, as described below;
- Linking to a City website URL without posting a disclaimer in their profile, as described below; and
- Using the City in their identity or username.

If an employee identifies themselves as a City of Georgetown employee when conducting personal social media activities, uses a brand, logo, emblem or other City identifiers, or posts a link to a City website URL, the employee must make it clear that they are speaking on his or her own behalf, and not on behalf of the City of Georgetown. They also should consider stating in their profile that their comments are not representative of City of Georgetown government. Examples include:

- *Twitter bio*: Tweets are my own.
- *Blog or website bio*: While I work for the City of Georgetown, anything I publish is my personal opinion and not necessarily the opinion or position of the City of Georgetown.

Whether or not an employee specifies on their personal social media accounts that they work for the City of Georgetown, their employment with the City is public record. Employees should be mindful that whenever they discuss issues online, whether in a personal or professional capacity, their comments can be tied back to their employment with the City of Georgetown. Additionally, personal accounts could be obtained and used in criminal trials, civil proceedings, in department investigations, and to assess bias that would erode public trust in the City of Georgetown.

Employees may not disclose confidential information from any department. Employees should honor the privacy rights of City officials, employees, and others by seeking permission before writing about or displaying internal City happenings that might be considered a breach of privacy or confidentiality.

Employees are discouraged from using City computers for personal business; however, an employee who accesses a **personal account** from City-owned, City-leased, or City-provided technology has no right to privacy of any information created, stored, transmitted, accessed, or viewed from that technology. The City may review, read, or otherwise monitor all internet activity and websites that are accessed. Social media access by employees while on duty using City property will be subject to the rules and guidelines set forth by the City's Information Technology Department.

Nothing in this policy is meant to prevent an employee from exercising his or her right to protected First Amendment speech; making a complaint of discrimination or other workplace misconduct; engaging in lawful collective bargaining activity; expressing an opinion on a matter of public concern that does not unduly disrupt City operations; or engaging in other activity protected or privileged by law, including (but not limited to) speech and/or expression protected under federal or state constitutions, as well as labor laws and other applicable laws. Speech that significantly harms the City's ability to provide public services may result in discipline, up to and including termination.

## **G. PROFESSIONAL USE**

This section lays out requirements and best practices for **official and authorized City accounts**, including those for elected officials and City departments. Additional requirements for **official accounts** for Mayor and City Council are found later in the policy. *Refer to DEFINITIONS above for a better understanding of applications for this section of the policy.*

### **Roles and Responsibilities**

Communications and Public Engagement Department (CAPE) will:

- Maintain a list of authorized and official social media accounts, corresponding authorized agents, and log-in information for security, archiving, and emergency response.
- Reinforce brand standards.
- Evaluate and make final determinations and recommendations for all social media channels, including requests to create new, deactivate old, and/or consolidate existing social media accounts.
- Ensure all content on authorized and official accounts are regularly archived.
- Work with departments to coordinate social media strategies, tactics, and campaigns, including for public engagement, programs, and events.
- Provide resources, training materials, and workshops on emerging and industry best practices.
- Set standards, metrics, and benchmarking to measure effectiveness of social media, including working with departments to establish consistent reporting.
- Serve as a resource to departments, including providing resources, answers to questions, and support as it relates to this policy and social media practices.

- Update this and other relative policies regularly.

Authorized agents will:

- Provide CAPE an updated list of authorized and official accounts, authorized agents, and log-in information, particularly when any of that information changes.
- Ensure the retention of stories or other temporary posts that are designed to disappear within a set period of time by saving the content to the City server.
- Verify accounts through the platforms that allow verification (e.g., Twitter and Facebook).
- Add one of the following phrases to the account profile:
  - Terms of use: <https://bit.ly/2XKrbq2>
  - This is a City of Georgetown government page. All content is a public record and may be subject to public disclosure. The City reserves the right to remove posts that violate the City or platform's Terms of Use: <https://bit.ly/2XKrbq2>
- Regularly post content to authorized and official accounts.
- Continuously monitor authorized and official accounts for questions from residents, rumors about the City or department that should be addressed, and other potential issues the City should prepare for. *It is not appropriate to engage in arguments with members of the public.*
- Respond to questions for information within one business day. If you do not immediately have the answer, respond that you are working on it, and when they can expect an update.
- Regularly track the effectiveness of posts and pages and adjust social media strategy as needed.
- Work with CAPE and other communications professionals in the City to develop, enhance, and use best practices.
- Not delete posts or comments left on authorized or official accounts.
- Uphold brand standards and values.
- Use City funding and follow purchasing policies to pay for any advertisements on authorized or official accounts
- Take proper measures to ensure social media security, including but not limited to:
  - Enabling two- or multi-factor authentication when possible.
  - Changing passwords immediately if authorized users are removed as administrator or leave City employment.
  - Changing passwords at least every six months.
  - Changing passwords immediately after authorized or official account has, or is suspected of being, compromised.
  - *NOTE: CAPE will manage these steps for official accounts.*

### **Guidelines for general use**

Authorized and official accounts for the City of Georgetown should remain professional in nature and always be conducted in accordance with the City's brand standards, values, policies, and expectations, as well as local, state, and federal open records and meetings laws.

The City of Georgetown recognizes the following goals as they relate to social media:

- Increase awareness about and engagement with the City, the services we provide, and the people who provide those services through coordinated social media campaigns.
- Cultivate the City of Georgetown’s brand in order to better establish a consistent, identifiable, trusted voice in the community.
- Maintain open, professional, and responsive public communications.
- Improve trust with the community and increase the consistency of key messages through engagement and collaboration.
- Share timely and important content with all relevant stakeholders.

The expectations of professional use of City of Georgetown social media are:

- **Authorized agents** are prohibited from posting to authorized or official social media accounts and content that is:
  - Obscene, pornographic, or racist
  - Potentially libelous
  - Hate-oriented
  - Personal attacks, insults, or threatening language
  - Plagiarized or copywritten
  - Private, personal information without written consent
  - Commercial promotions (that is not promoted pursuant to City business or authorized advertising or sponsorship) or spam
  - Hyperlinks or comments not directly related to the discussion
- Authorized accounts (not official accounts) should refrain from including any opinions regarding City employees, policies, programs, or practices.
- Posts on authorized or official accounts, including those posted by authorized agents or those from the public, shall not be deleted unless they meet one or more of the criteria laid out in **Monitoring public comments** below. If a post contains inaccurate information, authorized agents may edit the post, but make it clear how the post has been edited.
- There is no expectation of privacy with social media postings on authorized or official accounts. The City reserves the right to monitor the use of its devices or networks and to retrieve all social media postings.
- Employees may not disclose confidential information from any department.
- The establishment and use of authorized or official accounts is subject to approval by CAPE.
- Departments often work with outside consultants to promote services and engage in public outreach. While these relationships are crucial to the City of Georgetown’s success, consultants will not manage social media pages on behalf of City of Georgetown departments due to security and compliance concerns.

### **Monitoring public comments**

By definition, social media accounts encourage the exchange of ideas and information, allowing users to ask questions and voice their opinions. Some of these comments may be negative or unsavory. Authorized agents are not allowed to delete content under any circumstances. Authorized agents are allowed to **hide** comments **ONLY** when the comments contain one or more of the following:

- Obscenity: Authorized agents are encouraged to set any profanity filters offered by the third-party platform to the strongest possible.
- Defamation: The statement must be false, an assertion of fact, and cause damage.
- Actual threats: A communicated intent to inflict harm or loss in another that usually very specific. A test for this is whether you could charge the statement criminally.
- Spam.
- Illegal activities: Committing a crime, attempting to commit a crime, or encouraging others to commit a crime.
- Links to malware.
- Promotes illegal discrimination by government, like encouraging discriminatory hiring practices.
- Material that infringes on a copyrighted material.

*The default position for any authorized or official account of the City of Georgetown is not to hide any comments. Because social media accounts constitute limited public forums, similar to Council meetings, the bar to hide comments is high, and should be done in consultation with CAPE prior to action.*

### **Guidelines for content creation**

The City of Georgetown’s social media content includes any information posted on social media, including words, pictures, videos, and links. The City’s social media content should attract followers and interaction, encourage engagement, share relevant and timely information, and educate and inform followers about City business.

Social media content posted to authorized or official City accounts should:

- Link back to a City URL whenever possible. **While interactions with posts about public engagement opportunities should be monitored and included in reporting, official responses to requests for feedback should be directed to the formal channels (i.e., Survey Monkey).**
- **Be scheduled at optimal engagement times.**
- Include some kind of visual element to accompany the text, with local images, custom graphics, and videos taking precedence over stock images.
  - If an image or graphic has text on it, it should always include an alternative text tag.
  - Authorized agents also should ensure any images or graphic depictions are diverse and inclusive of the Georgetown population.
  - Photos of a member(s) of the public, as well as City employees, should have the subjects’ permission for its use, particularly if the image will be used in advertising.
  - While GIFs and memes can be effective on social media, authorized agents should use them with caution, keeping the origin and context of the content in mind, as well as the account’s audience.

### **H. ADDITIONAL REQUIREMENTS FOR ELECTED OFFICIALS**

This section applies only to **official accounts**. As noted in DEFINITIONS above, official accounts refer to social media accounts of the Mayor and City Council that are created and administered by the City of

Georgetown to communicate with members of the City Council district. Administration includes ensuring records are retained, accounts are handed over to newly elected officials, and this policy is followed. City staff will not be responsible for content creation or day-to-day management.

### **Ethics**

All officials are expected to abide by City of Georgetown ethics policies when on official or personal accounts and on other social media sites.

### **Separation of Account Purposes**

Elected officials are encouraged to maintain separate campaign and official accounts on social media platforms. Official accounts can only contain content related to City business. Content that advocates for candidates or other ballot measures is prohibited on official accounts, because official accounts are resources of the City of Georgetown.

### **No Links to Personal Social Media Sites**

Official accounts must not include hyperlinks to personal accounts.

### **Account Continuity**

Official accounts are to remain with the City, and not the person in the elected or appointed position. Posts to an official account are City data. CAPE must retain access to these accounts for continuity. City staff will not be responsible for content creation or day-to-day management.

### **Account access**

CAPE has created social media accounts for the Mayor and City Council districts on Twitter, Facebook, and Nextdoor, which are available to elected officials upon request. Prior to the elected official gaining access to the official account, the elected official must go through training on this policy and social media best practices.

If an elected official wants an official account on another platform, he or she must submit the request to the City Manager and CAPE.

### **Existing accounts**

Elected officials who have existing social media accounts they want to use for official purposes must:

- Ensure their pages comply with this policy and other legal requirements for communication for elected officials, including the types of content allowed.
- Provide CAPE the log-in information to the accounts they want to use in an official capacity, so the City can archive records.
- Update the profile information to include the date at which posts transitioned to official use, and stop interacting with posts made before then.

Elected officials who want to transition an existing page to an official page may share posts from the official page to their existing page, to help direct followers to the new account.

### **Naming Conventions**



CAPE will determine the uniform naming conventions for official accounts.

Official accounts will have uniform naming convention and URLs. The page, profile, or account name may include the current elected official's name; however, the page's username (i.e., in the URL on Facebook or handle on Twitter) must remain office-specific. The usernames and handles should be consistent across social media platforms.

### **Account template**

Elected officials should use their official City headshot as the profile photo and a photo from the district as the banner image.

### **City Data and Archiving**

All communications and engagement conducted on official accounts are considered City data. This data must be archived and managed in accordance with the Texas Public Information Act, retention laws, and approved retention schedules. Posts and comments, regardless of who created them, will be archived. Officials may not retain official accounts or access to any official accounts in a personal capacity after departing the City, because accounts are City data.

### **Account Transition**

When an elected official leaves office, the official account will transfer to the new office holder. The accounts will be updated to reflect the newly elected official.

### **Political activity**

All elected officials are prohibited from using official accounts to:

- a. Engage in any political activities, such as to campaign for re-election;
- b. Endorse any candidates for any office;
- c. Influence or compel any person to apply for membership in or become a member of any political organization;
- d. Pay or promise to pay a political contribution.

Officials may use their personal accounts or other social media sites for these types of activities. Officials must not use official accounts to engage in any activity or conduct that violates federal, state, or local law, or circumvents election or campaign requirements.

### **Content**

Content posted to official accounts for elected offices must:

- a. Be in compliance with all local, state, and federal laws and these procedures;
- b. Be relevant to the respective office;
- c. Not include personal, political, or campaign information;
- d. Not include grassroots lobbying or solicit support for a position;
- e. Not generate, circulate, solicit, or encourage signing petitions;
- f. Not include any advertisement, endorsement, or solicitation from any private individual firm, business, organization; and

- g. Not imply the City endorses or favors a specific product, commodity, or service, unless the business, organization, or individual has an official partnership with the City.
- h. Follow existing guidelines related to the City logo and branding

Elected officials are encouraged to use official accounts to:

- Solicit feedback from their constituents prior to an official vote, to help inform their opinion.
- Share explanations of their vote after it has been cast.
- Share City updates and public engagement opportunities.
- Interact with constituents.

### **Avoiding prejudgment bias and ex-parte contacts in quasi-judicial proceedings**

An elected official shall not post on an official account, or on their personal accounts, their own comments that could be construed as advocating for a position on an action that will be taken by the City Council in a quasi-judicial proceeding. An example of a quasi-judicial proceeding would be a City Council determination on whether to revoke a business license.

If an official or personal account of an elected official contains comments that are not those of the elected official and that relate to any action that will be taken by the City Council in a quasi-judicial setting, the comments should be forwarded to the City Secretary's Office prior to the hearing for appropriate inclusion in the Council record, based on whether the public comment is accepted for the particular type of quasi-judicial determination at issue. When there is not sufficient time prior to the hearing to forward the comments, the elected official can disclose the information on the record at the time of the hearing.

### **Open Meeting and Public Business**

The Texas Open Meeting Act governs whether communications must be discussed in an open meeting or constitutes a meeting. Elected officials must not use official accounts to discuss matters that can only be discussed in an open meeting under the Texas Open Meeting Act.

Use of official accounts by elected officials does not violate the Open Meetings Act as long as the use is limited to exchanges with all members of the general public.

## **I. CREATING NEW ACCOUNTS**

When planning to launch new **authorized or official social media accounts**, departments and elected officials will work with CAPE to complete a **social media action plan** that addresses key questions, including:

- Overall vision for social media strategy.
- Description of why the account is needed/differs from existing channels.
- Current communications channels.
- Goals and objectives.
- Target audiences, including an explanation for how no existing channel reaches or includes that audience.
- Resources and staff time needed and available.

- Marketing and public input opportunities.
- Equity considerations.
- Records retention.
- Success metrics.

Once the social media action plan is finished, CAPE will evaluate the request, and make corresponding recommendations.

## **J. AUTHORIZED AND OFFICIAL SOCIAL MEDIA ACCOUNTS: TERMS OF USE**

*These terms of use will be posted to the City's website, and authorized and official accounts must include a hyperlink in the account profile.*

Requests for emergency services should be directed to 9-1-1 and not through this site.

To better serve the public, the City of Georgetown and its elected officials ("City") uses engagement tools and websites, including social media channels, to provide the public with information. Content placed on this site by the City is government speech.

Comments, posts, replies and messages, if allowed on this site, are public and are subject to disclosure pursuant to the Texas Public Information Act. The City may reproduce any pictures or videos posted to this site in any of its publications or websites. All content will be kept in accordance with the City's retention policies. Please be aware that anything you post may survive deletion, whether by you or others.

The purpose of City social media sites is to discuss matters of public interest in and to the City as identified and raised by the City for discussion. If posts are allowed on this site, you must address your comments to the specific topic(s) raised by the City.

Users who submit content to this site agree they have read, understand and agree to the following terms and conditions. The City's Terms of Use are in addition to those upheld by the social media platforms (i.e., Facebook and Twitter).

### **Terms of Use**

1. I am submitting content voluntarily and on my own behalf.
2. The content I post reflects my own original thoughts or work.
3. I understand the City has the right to re-post or share any content, photos or videos that I submit on this Site.
4. I understand any content I provide may be considered a "public record" under state law.
5. I understand and agree that unless specifically identified as a resource for receiving requests for information under the state public information laws, this Site is not a proper vehicle for making data requests under state law and any such requests must be made in writing under City procedures as outlined on its website [georgetown.org](http://georgetown.org).

6. I understand and agree that my comments are subject to removal and archiving from this Site, and I understand that others' comments are subject to removal and archiving if my or their comments contain:

- Obscenity: Authorized agents are encouraged to set any profanity filters offered by the third-party platform to the strongest possible.
- Defamation: The statement must be false, an assertion of fact, and cause damage.
- Actual threats: A communicated intent to inflict harm or loss in another that's usually very specific. A test for this is whether you could charge the statement criminally.
- Spam.
- Illegal activities: Committing a crime, attempting to commit a crime, or encouraging others to commit a crime.
- Links to malware.
- Promotes illegal discrimination by government, like encouraging discriminatory hiring practices.
- Material that infringes on a copyrighted.

7. I understand the views and comments expressed on this Site only reflect those of the comment's author, and do not necessarily reflect the official views of the City.

8. Individual complaints, concerns, or service requests may not be addressed via this Site unless the City specifically identifies this Site for that purpose.

9. I understand that to protect my privacy and the privacy of others, I should not include sensitive personally identifiable information, such as social security numbers or financial data. I understand this Site should not be considered secure.

10. I understand that if I have specific questions regarding a City activity or program that involves details I do not wish to share publicly, I should consult with the proper contact person for that City activity or program.

11. I understand posts to this Site may be removed under the City's Social Media Policy and its implementing procedures, and these posts may be retained as government data.

12. I understand the City reserves the right to discontinue this Site at any time.

13. I understand practical and legal considerations may sometimes constrain, prevent, or prohibit discussion by the City on this Site of certain topics, including, but not limited to, litigation and pending investigations.

14. I understand following or "friending" persons or organizations is not an endorsement by the City and is only intended as a means of communication.

15. I understand any references or links to a specific entity, product, service or organization posted by individuals on this Site should not be considered an endorsement by the City.

16. I understand the City does not endorse any product, service, website, company or organization whose advertising or messages may appear on this Site, besides advertising expressly sponsored by the City of Georgetown.

17. I understand the City does not review, sponsor, or endorse any other website(s) linked to this site. I understand the views and opinions of authors expressed on those websites do not necessarily state or reflect the opinion of the City and may not be quoted or reproduced to state or imply any endorsement or approval of any product, person, or service by the City or its Covered Persons or agents.

18. I understand the City is not responsible for and does not guarantee the authenticity, accuracy, appropriateness or security of any link, external website or its content.

**Waiver of Liability**

By accessing this Site, posting, or commenting, I acknowledge having been advised of the foregoing. Because various laws exist that create liability for various actions, including but without limitation defamation, invasion of privacy, false light, breach of contract, procurement violations, violations of due process among many potential areas of exposure for which the City accepts no responsibility based on the actions of others or for hosting this Site, I, for myself, successors and assigns, release and hold harmless and agree to indemnify the City, including its Covered Persons, elected officials, and agents from any and all actions, claims, liabilities and damages of whatever kind and nature arising out of or in connection with my use of this Site.