

Union Sanitary District Policy

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Policy

The Union Sanitary District (the “District”) has an overriding interest and expectation in protecting the integrity, security, and accuracy of information posted on any official District Social Media Pages, as well as content that is attributed to the District and its officials. All District Social Media Pages must comply with this Policy.

Purpose

The District recognizes that Social Media plays an increasingly important role in society and communication. While Social Media presents many benefits such as community engagement, it also presents potential liability to the District. This Social Media Communications Policy (“Policy”) establishes general guidelines on the establishment, use and maintenance of Social Media sites.

Although Social Media provides an interactive platform, the District intends to create only a limited public forum subject to the restrictions set forth in this Policy.

Definitions

- A. “Social Media” refers to interactive online platforms which enable users to create and share content, and which may allow two-way communication between the District and the public. Examples of Social Media platforms include, but are not limited to: Twitter, Facebook, Nextdoor, Youtube, Instagram, and LinkedIn. These platforms can be accessed either through a web browser, a mobile application, or both.
- B. “District Social Media Pages” means Social Media sites, pages, mobile applications, services, or feeds established and maintained by a District Social Media Lead on behalf of the District, and through which information is provided to the general public.
- C. “District Social Media Lead” or “Social Media Lead” refers to those District Employees specifically authorized by the General Manager to create content or to Post or Comment on a District Social Media Page on behalf of the District.
- D. “Employee,” for the purposes of this Policy, includes District Employees and District contractors.
- E. “Posts” or “Postings” or “Comment” or “Comments” means information, articles, pictures, videos or any other form of content or communication displayed on a District Social Media Page, including by members of the public.

Procedure

1. Social Media Leads

- A. District Social Media Leads will be responsible for creating District Social Media Pages, posting content on the District Social Media Pages on behalf of the District, monitoring content, responding to Posts and Comments where appropriate, and ensuring adherence to this Policy.
- B. District Social Media Leads shall not post on any other person's or entity's Social Media site, but may share content, or repost or like content or posts, from another person's or entity's Social Media site, provided such content or posts meets the criteria in Procedure, Section 2(B) below.

2. Social Media Pages

- A. District Social Media Pages shall be created by the District after taking the following factors into account: (1) the objectives, goals, and intended audience of the new Social Media site; (2) the ability of Social Media Leads to update and maintain the Social Media site in a timely manner; and (3) the number of people likely to participate on the Social Media site.
- B. District Social Media Pages are to be used for informational purposes and all content must pertain to or raise awareness of the District and/or District business, programs, services, mission statement, purpose or events. Confidential, proprietary, privileged, private, personnel, or other non-public information is not to be posted or discussed on any District Social Media Page.
- C. The District's official website is the District's primary source and means of internet communication. Information posted by the District on Social Media Pages will supplement and not replace required notices and standard methods of communication.
- D. District Social Media Pages should make clear that they are maintained by the District, state that they follow the terms of this Policy, and include a summary of this Policy.
- E. District Social Media Pages and all content are District property and are not intended for the personal use or benefit of any person or entity other than the District.
- F. Any content by District or third parties on a District Social Media Page, including, but not limited to Comments, deleted Posts, private messages, chats, and "likes" may be subject to the California Public Records Act. Any content maintained in a Social Media format that is related to District business, posted communication, communication submitted for posting, and removed content, may be a public record subject to public disclosure.

- G. Any opinion expressed on behalf of the District, on any District Social Media Page, is not a substitute for a formal statement in a public hearing process.
- H. The District reserves the right to have any content restricted or removed if deemed to be in violation of this Policy or any applicable federal, state, or local law. Any such removed content must be retained consistent with the Public Records Act, where applicable, and/or the District's document retention policy, including the date, time and identity of the poster, when available.
- I. The District shall have full permission and rights to any content posted by or on behalf of the District, including all articles, photographs and videos.
- J. The District is not responsible for any third-party content, including promoted content, which is placed on its District Social Media Pages.
- K. No individual photos or videos of any District Board member shall be used on a District Social Media Page.
- L. District Social Media Pages may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy.
- M. District Social Media Pages may not be used for campaign-related purposes. Such campaign-related purposes include, but are not limited to, the following: (1) statements in support or opposition to any candidate or ballot measure; (2) requests for campaign funds or references to any solicitations of campaign funds; or (3) references to the campaign schedule or activities of any candidate. Further, no District Social Media Page shall be linked to any private web site related to a candidate's campaign for elective office but may be linked directly to the District website's election-related pages where general election information may be found.

3. Comment and Response

- A. Many Social Media sites permit and invite Posts and Comments by site users. By permitting use of this feature, the District does not intend to create a general public forum on the District Social Media Pages, and all Comments and Posts must comply with this Policy and any host site user guidelines.
- B. The District shall include a commenting notice on any District Social Media Page, which shall outline the requirements of this Policy.
- C. All Posts or Comments on District Social Media sites shall be monitored by District Social Media Leads during normal business hours.
- D. The following Posts or Comments are inappropriate and are subject to removal or restriction by the District. The list is not necessarily exhaustive, and the District

reserves the right to remove, restrict or hide any Post or Comment that violates the purpose or spirit of this policy:

1. Comments not related to District posts, business, information, announcements, and events, or Comments not related to the original topic, including random or unintelligible Posts;
2. Profane, obscene, violent, sexual, or pornographic content and/or language;
3. Content that promotes, fosters, or perpetuates discrimination or harassment on the basis of race, color, national origin, religious creed, ancestry, physical or mental disability, medical condition, pregnancy, childbirth or related medical condition, age, sexual orientation, sex, gender identity, gender expression, genetic information, military or veteran status, marital status, or any other basis protected by applicable state or federal law;
4. Defamatory content and/or language;
5. Threats to any person or organization, or hate speech;
6. Content that engages in or encourages illegal activity;
7. Information that tends to compromise the safety or security of District Employees, the public, public systems, or the District's technology resources;
8. Content that violates any legal ownership interest, such as a copyright or trademark;
9. Content that violates another person's right to privacy, including content containing personal information, such as home addresses, phone numbers, social security numbers, dates of birth or driver's license numbers;
10. Content that contains confidential or proprietary information;
11. Content containing false, vicious or malicious statements concerning any employee, the District, or its operations;
12. Any political, campaign or election content, including Comments in support of or opposition to any political campaigns or ballot measures;
13. Solicitation of commerce, including any advertising or business services or products for sale;
14. Content that violates any federal, state or local laws; and
15. Information that may compromise the safety or security of the public, District facilities, or employees.

Notwithstanding the foregoing, the District is not obligated to take such actions, and

the District disclaims any and all responsibility and liability for content or materials that cannot be removed in a timely and expeditious manner.

- E. The District reserves the right to report a user directly to the host site if a Post, Comment or other content by the user violates the host site's terms of use.
- F. The District reserves the right to deny access to District Social Media Pages for any individual who repeatedly violates the terms of this Policy without notice.
- G. A Post or Comment by a member of the public on any District Social Media Page is the opinion of the commenter and poster only and does not imply endorsement of, agreement with, or reflect the opinions or policies of the District.
- H. The District is not liable for any loss or damage resulting from any Posts or Comments on a District Social Media Page.
- I. Any District Social Media Lead authorized to Post on the District's Social Media Pages shall use his or her best judgment in deciding whether or not to respond to a Post or Comment and shall not engage any user in an argumentative or offensive manner. Any response shall be limited to objective, factual information, such as a link to the District's website to provide information. Any District Social Media Lead who encounters an inappropriate situation or abuse by a user of the Social Media site shall immediately report the situation to the General Manager.

Employee Responsibility

Employees are responsible for adhering to the District's policy regarding Social Media communications. It is each employee's responsibility to know, understand and abide by this Policy.

Management Responsibility

Management is responsible for implementing this Policy. Management is also responsible for informing employees of this Policy and for initiating appropriate and prompt action relative to employees who appear to fall within the guidelines of this policy and follow up on any reports of violations.

Approved by: Board of Directors

Author/owner: General Manager

Reviewers: Board of Directors, General Manager, General Counsel, Executive Team, Communications and Intergovernmental Relations Coordinator

Notify Person: Communications and Intergovernmental Relations Coordinator

Review Frequency: 3 years

Next Review: February 2023