

# City of Los Alamitos Administrative Regulation

<b>Regulation:</b>	<b>7.4</b>	<small>DocuSigned by:</small>  <small>040A80B8E29D4FE...</small> <b>Chet Simmons, City Manager</b>
<b>Title:</b>	<b>Social Media Policy</b>	
<b>Authority:</b>	<b>City Manager</b>	
<b>Date:</b>	<b>April 2020</b>	
<b>Revised:</b>	<b>December 12, 2023 October 17, 2024</b>	

**1. Purpose:** The City of Los Alamitos’ use of social media enhances communication and engagement with the public. It is being employed to advance the goals of the City and its departments in efficient operations, inclusion, transparency, and communication of emergent, time-sensitive information in regard to public safety.

**2. Application:** The City shall utilize and manage Official City Social Media Accounts consistently across all of its departments and divisions to advance the City’s vision. This Policy applies to regularly scheduled information releases and should be used in conjunction with Administrative Regulation 9.04 - Public Information Release. Internal procedures may be established to ensure compliance with this policy.

### **3. Regulation:**

#### **A. Official City Social Media Accounts**

The City’s overriding interest and expectation in deciding what is spoken, published, or broadcasted on behalf of the City requires that Official City Content be limited to Official City Social Media Accounts.

The Director of Communications (the “Director”) shall maintain a list of the Official Accounts and the login and password information for each Official Account so the City can immediately edit or remove content in accordance with this policy. Account passwords shall only be shared with the Director of Communications, City Manager, and/or their designee.

The City and the Police Department are each authorized to have one Official Account. The Director of Communications and City Manager may consider additional accounts at their discretion. Official Accounts must comply with all provisions of this policy.

Official Accounts that violate this policy may be removed or closed without notice at the sole discretion and authority of the City Manager, Director of Communications, or designee.

Official Accounts shall comply with all applicable federal, state, and local laws, regulations, and policies. This includes adherence to established laws and policies regarding copyright, records retention, the California Public Records Act, the First Amendment, and privacy and information security policies established by the City.

**B. Authorized Social Media Publishers**

Authorized Social Media Publishers shall:

- Provide monthly content calendars to the Director of Communications.
- Utilize Meta Business Suite to schedule content.
- Regularly review, be familiar with, and comply with the City's policies on the use of Official Accounts.
- Only authorized Social Media Publishers can respond to comments. Refer to Section 8, Managing Public Comment.

**C. Communications on Official City Social Media Accounts**

Only Authorized Social Media Publishers, the Director of Communications, and the City Manager may post, edit, delete, or modify information on Official Accounts.

**4. Procedures**

**A. Official City Social Media Account**

The Director of Communications keeps the Official City Social Media accounts on record. They include, but are not limited to:

City Business shall use the handle @cityoflosal whenever possible.

Instagram: <https://www.instagram.com/cityoflosal/>

Facebook: <https://www.facebook.com/cityoflosal>

The Police Department shall use the handle @losalamitospd whenever possible.

Instagram: <https://www.instagram.com/losalamitospd/>

Facebook: <https://www.facebook.com/losalamitospd>

Social Media Accounts should only be created with the approval of the Department Director, City Manager, and Director of Communications. Contact the Director of Communications prior to creating any social media accounts for the purpose of conducting City business.

New accounts will only be authorized when they are considered an appropriate channel of communication for the City and their use is consistent with this policy. Upon approval and set-up of the account, log-in information will be filed with the Director of Communication.

**B. Legal Disclaimers**

The following disclaimer or a link to this policy shall appear on every social media official City account.

*This account is intended to be a limited forum for communication and discussion about specific topics between the City of Los Alamitos and members of the public. The City of Los Alamitos reserves the right to remove inappropriate comments, including those comments that are not topically related, comments that include profane or obscene language, sexual content, threats, defamatory statements, the encouragement of illegal activity, violations of the legal ownership interests of another party, solicitations of commerce, statements in support or opposition to political candidates or ballot propositions, content that promotes, fosters, or perpetuates discrimination, or information that may compromise the safety or security of the public or public systems. Any content posted may be subject to public disclosure upon request. Activity on this account is subject to all applicable federal, state, and local laws regulations and policies.*

**C. Authorized Social Media Publishers**

Requests to become an Authorized Social Media Publisher shall be made in writing to the Director of Communications using the appropriate form. You will be granted sign-in permissions for the City's account upon approval.

**D. City Issued Social Media Device**

The City may issue mobile phones and/or tablets to employees to ensure the content and quality of social media posts are consistent throughout the City. Media devices issued by the City are City property. Employees must comply with the City if requested to make their City-issued media device available for any reason, including upgrades, replacement, or inspection. Employees who leave the City's employment for any reason must return their City-issued media device.

Administration, Development Services, Recreation, and the Police Department will each be issued one social media device. Each department will designate a custodian to be kept on record with the Director of Communications, along with the passcode to access the device. The media device is intended to improve the quality of the content published and

increase productivity for posting stories and reels. Regularly scheduled posts should still be published in the Meta Business Suite.

These social media devices will have direct access to the City's Official Accounts and should be shared with caution. Departments are encouraged to develop policies for using social media devices specific to their departments and the approval process for posting. The custodian of the devices shall know who has the device at all times and be aware of any content that is being scheduled and posted. The Director of Communications and/or City Manager will reach out directly to the device custodian for any posting issues.

Employees are discouraged from using their personal devices to create content for official city social media accounts.

#### **E. Personal Use of City-Issued Devices**

City-issued social media devices are to be used for social media and content creation purposes. Employees shall not download any other work-related applications, as the social media device will be shared amongst the department. Personal use may result in discipline. Employees are expected to reimburse the City for any costs or charges relating to personal use of the City-issued social media devices.

#### **F. Monitoring and Enforcement**

The City reserves the right to monitor social media activity related to the City. Violations of this policy may result in disciplinary action, including termination of employment.

#### **G. Training and Support**

The City will provide training on responsible social media use. Employees may contact the Director of Communications for guidance on social media use and this policy.

### **5. Generally:**

When using Official Accounts, Authorized Social Media Publishers shall:

- Be respectful, professional, ethical, and comply with all City policies, local, state, and federal laws.
- Use proper grammar and avoid technical terms or abbreviations unless there is a common understanding of its meaning.

- Ensure the information communicated is accurate and complete. If a mistake is made, it should be disclosed and promptly corrected in a response to the original post.
- Be transparent and truthful. Your honesty—or dishonesty—will be quickly noticed in the social media environment. Remember, you may be personally responsible for your content. Always be careful and considerate. Once the words are posted, they can't be retrieved.
- Be judicious. What you publish is widely accessible and will be around for a long time, so consider the content carefully. A social media post could be used in a legal action against the City or its employees.
- Stay current and be consistent with the goals of the City.

## 6. Authorized Social Media:

When using Official Accounts, Authorized Social Media Publishers shall not:

- Post personal information, except for names of City employees whose job duties include being available for contact by the public, or as specifically authorized by the City Manager.
- Post something that makes you even the slightest bit uncomfortable. Ultimately, what you post is your responsibility.
- Post comments, photographs, or videos that could discredit or embarrass the City.
- Express personal views or concerns through postings.
- Reveal confidential information as defined by any City policy or local, state, or federal law.
- Post anything that would infringe upon another's property rights, such as copyrighted material.
- Post anything that would injure another person's or entity's professional or personal reputation.
- Post any content that engages in political or religious advocacy or commentary, or supports or opposes any ballot issue or candidate for office.
- Post any content that is prohibited on Official City Social Media Accounts.

## 7. Prohibited Content

The following is prohibited on Official City Social Media Accounts:

- Profane or obscene language or content;
- Sexual content;
- Threats;
- Defamatory statements;
- Encouragement of illegal activity;
- Violations of a legal ownership interest of any other party;
- Solicitations of commerce;

- Statements in support of or opposition to political campaigns, candidates, or ballot measures;
- Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability, or sexual orientation; and
- Information that may tend to compromise the safety or security of the public or public systems.

## 8. Managing Public Comment

Only Authorized Social Media Publishers with written authorized approval from the Director of Communications may comment and respond to comments on Official Accounts.

Public comments are allowed on Official Accounts. An appropriate legal disclaimer shall be posted on an Official Account or through a link provided to the social media policy hosted on the City's Official webpage. The Authorized Social Media Publisher shall immediately notify the Director of Communications regarding any comment containing prohibited content described in Section 7 of this policy.

Individuals shall not be blocked and content on Official Accounts shall not be deleted simply because they are critical of the City, its officials, or employees, or because the agency or Authorized Publisher otherwise dislikes what the content says or represents. Content may be deleted by the Director of Communications only when it violates this policy.

Any content removed from an Official Account must be retained in accordance with the City's Records Retention Policy, and the time, date, and identity of the poster shall be noted, if that information is available.

### A. Responding to Social Media Comments

When responding to social media comments, Social Media Publishers shall comply with the following guidelines:

- Respond promptly to all comments within business hours.
  - Staff is not required to respond to social media comments outside of established work schedules, except for employees who are exempt, in public safety, or in the City Manager's Office/Administration.
- Responses should be positive, polite, and professional. The Director of Communications shall have the final say over what is appropriate.
- Thank the commenter for being involved in the community and taking the time to share their experience.

- Have a call to action. Invite your customers to do something in the response, like asking them to check out another service or visit your website.
- Refrain from lengthy responses. When possible, keep replies to three sentences.
- If a commenter is unhappy, it's imperative to reach out and resolve the issue proactively.
- Be honest and stick to the facts. Being truthful and honest will help build trust and integrity in your brand.
- Personalize the response. The comments will not be the same, so your responses shouldn't be either. Tailor your message to that specific question or concern.
- Keep responses simple, short, and sweet. In a public forum, it's best not to go into too much detail or ask questions. This will prevent possibly saying something that would upset the customer further.
- Take the conversation offline. Depending on the comment's nature, it could be best to take the conversation into a private space by directly messaging the user and addressing their questions or concerns within the social media platform.
  - If the situation escalates, advise the user Staff will reach out to them directly. Send a direct message to the user requesting their phone number or email address so Staff may contact them. Forward all relevant information to the Director of Communications through e-mail for follow-up.
- Comments should not be ignored.
- Comments should not be deleted. If the comment is inappropriate, contact the Director of Communications immediately.
- Keep the messaging to the facts, and don't promise something your brand can't deliver.
- Do not use obscenities or aggressive language. Always keep the tone positive, polite, and professional.

## **9. Integrating with the City's Website**

The City's website, [www.cityoflosalamitos.org](http://www.cityoflosalamitos.org), will remain the City's primary and predominant means of internet communication. Official City Social Media Accounts shall supplement, but not replace, the City's required notices and standard methods of communication.

All Official City Social Media Accounts shall link back to the City's official website for forms, online services, and other information necessary to conduct business with the City.

## 10. Interacting with Other Social Media Accounts

Interacting with other social media accounts can be a useful tool in informing residents about City activities, policies, and issues. However, Authorized Social Media Publishers should use sound judgment when interacting with other social media accounts because those interactions may easily be misinterpreted. 'Interacting', as used here, includes, but is not limited to, "like(s)," "post(s)," "tweet(s)," or "following" on social media platforms. For example, "liking" or "re-posting" on Facebook and "following" or "re-tweeting" on Twitter can be perceived as an endorsement of that person, account, message, or thing. And those things can change over time. Similarly, "un-liking" or "un-following" can be perceived as a rejection of that person or thing.

Authorized Social Media Publishers must do the following when considering interacting with non-City social media accounts:

- Read all information in the original and any other relevant post, tweet, or link thoroughly before interacting with it to ensure that it enhances community knowledge about City activities, issues, policies, and priorities. If the content does not specifically address the City, it should be of interest to the particular Official Account's audience.

For example, a post about a regional police department's investigation of animal cruelty might be shared by the Long Beach Animal Control's Facebook account.

- Interact with information that is consistent with the City's goals.

In the above example, the Authorized Social Media Publisher should only share the police department's post if it promotes the Animal Shelter's interest.

- Clearly identify the external source of the information (post, tweet, link, etc.). Authorized Social Media Publishers are encouraged to interact with other social media accounts operated by the City, other government agencies, or businesses that are promoting the City's projects or goals. The following are some examples of appropriate account interactions:

- Other Official Accounts.
- Other governments or quasi-government agencies relevant to the subject matter of the particular account.
- City-related organizations, such as the Museum and Chamber of Commerce.
- Art Museum.
- Businesses.
- Relevant media outlets (local, regional, state, trade).

## 11. Social Media Posts Are Public Records

Any content published on an Official Account, including but not limited to lists of subscribers, posted communications, and communications submitted for posting, may be considered a public record for purposes of the California Public Records Act and the City's Records Retention Policy. The department responsible for maintaining the Official Account shall preserve and maintain records in an accessible format so that the records can be reviewed and, when appropriate, produced in response to a request for public records. Include a statement on the Official Account clearly indicating that any content posted may be subject to public disclosure upon request.

## 12. City Employee's Personal Use of Social Media

City employees are not prohibited from using social media platforms to express their opinions and views. However, if it can be reasonably interpreted from the content of the post (e.g., photo, comment, tweet, following, sharing, or video) or from other details provided on the City employee's social media account that the City employee is speaking on behalf of the City on their personal account, the employee shall provide a disclaimer on the account or in the same post stating that their opinions and views do not reflect the opinions and views of the City of Los Alamitos.

This disclaimer aids in protecting City employee's lawful rights. However, the use of this disclaimer does not shield against discipline for violations of this policy. The City reserves its right to regulate what is spoken or expressed on its behalf.

The following are two real-world examples where public employees were disciplined for posts made on their personal social media accounts. In both cases, the discipline imposed was upheld or determined to be lawful as it was reasonable to infer that the employees were speaking on behalf of the city. Please note that the following is not comprehensive. Determining what content could be reasonably interpreted to be protected is highly fact- sensitive and will be determined on a case- by-case basis.

### Example A

The discipline of a public employee for making critical remarks on her personal Facebook account regarding a certain community group was lawful because the employee's comments brought into question her fitness for their position and reflected adversely on their employer. The employee identified her position and place of employment on her personal Facebook account. (*Shepherd v. McGee* (2013) 986 F. Supp. 2d 1211.)

### Example B

The discipline of a public safety officer for posting negative comments about a co-worker's job performance and a superior officer's integrity on their personal

Facebook account, set to private, was lawful because the employer's interest in establishing and maintaining discipline and good working relationships amongst its employees was of greater importance. (*Gresham v. City of Atlanta* (2013) 542 Fed. Appx. 817.) Public safety officers are "classic positions of public trust" and are held to a higher standard than most other public employees.

- Keep in mind that if your conduct on social media platforms adversely affects your job performance or the performance of your co-workers, is detrimental to the mission and function of the City, or otherwise adversely affects members of the public served by the City, people who work on behalf of the City, or the City's legitimate business interests, the City may take disciplinary action against you, up to and including termination.
- Utilize non-work email addresses and phone numbers when establishing personal social media accounts.
- Nothing in this policy inhibits your right to engage in protected concerted activities as specified in the Meyer-Milias Brown Act. Protected concerted activities include the right to form, join, and participate in the activities of employee organizations of the employee's choice for representation on all matters of employer-employee relations.

## 13. Definitions

### **Authorized Social Media Publisher(s)**

A City employee who has been authorized, pursuant to the procedures contained in this document, to use Official City Social Media Accounts.

### **City**

City of Los Alamitos.

### **Communications on Social Media**

Includes, but is not limited to, ideas, photos, videos, news, links, responses, and other content expressed on social media.

### **Defamatory Statement**

Includes, but are not limited to, untrue statements that are presented as fact about another individual which damages their reputation.

### **Legal Ownership**

Refers to intellectual property rights.

### **Official City Social Media Account or Official Account**

A City account on a social media platform that has been approved pursuant to the procedures contained in this document.

**Social Media Platform**

An online platform through which users can establish an account and create online communities to share information. Social media platforms include Facebook, Instagram, LinkedIn, Nextdoor, Twitter, Periscope, Vine, and YouTube.

**Official City Content**

Content that is published on social media platforms consistent with this policy on behalf of the City by department, division, program staff, or consultants at the direction of City employees.

**Exhibit A – Social Media Form**



# CITY OF LOS ALAMITOS

## SOCIAL MEDIA FORM

City Clerk's Office/Director of Communications  
3191 Katella Ave., Los Alamitos, CA 90720-5600  
Phone: (562) 431-3538 Fax: (562) 493-0678

This form is submitted in compliance with Administrative Regulation 7.4, Social Media Policy.  
<https://cityoflosalamitos.org/207/Administrative-Rules-Regulations>

**SOCIAL MEDIA PLATFORM:** \_\_\_\_\_

Department/Division: \_\_\_\_\_

Department Director: \_\_\_\_\_

Department Director Signature: \_\_\_\_\_

### TYPE OF REQUEST (CHECK ALL THAT APPLY):

- Request to Add Social Media Publisher
- Request Authorization to Respond to Social Media Comments
- Request Authorization to be the Custodian of the Social Media Device

Employee Name: \_\_\_\_\_

Employee's Work Email Address: \_\_\_\_\_

Employee's Work Phone Number: \_\_\_\_\_

Custodian's After-Hours Phone Number: \_\_\_\_\_

**By submitting this form, I acknowledge I have that I have read, understand, and agree to abide by Administrative Regulation 7.4, Social Media Policy.**

Employee Signature: \_\_\_\_\_

#### **Director of Communications Office's Use Only**

- Approved       Denied
- Social Media Publisher     Social Media Comments     Custodian of Social Media Device

Comments: \_\_\_\_\_

Username: \_\_\_\_\_ Password: \_\_\_\_\_

Device Number: \_\_\_\_\_ Password: \_\_\_\_\_