




Subject/Title
Social Media Policy

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ADM 15



City Manager

City Manager's Office

Responsible Key Business

PURPOSE:

To provide guidance to City of Charlotte employees in the implementation of social media in order to inform employees of expectations when using social media so that the City achieves high standards in communication that reflect positively on the City and complies with City policies such as logo standards, Internet usage policy, public records retention, personnel information and sponsorships.

POLICY SCOPE:

This policy applies to all City departments and employees and includes all forms of social, digital and mobile media platforms.

Definition

For purposes of this policy, “social media” is an umbrella term that encompasses various City engagement activities while integrating technology, social interaction and content creation to share or exchange information, allow comment on user-generated content or otherwise encourage online discussion about City programs, services, projects, events, activities and other matters of public interest.

1. Use of Social Media

Social media enables the City to reach different demographics in order to achieve certain business and communication goals including the following:

- Transparency in conducting local government business
- Civic engagement regarding City projects, programs and initiatives
- Disseminating information, especially time-sensitive material during public safety emergencies
- Promotion of the City and its services and programs

Social media tools supplement the City’s primary websites and, among other purposes, should drive people to the primary web resources. The City’s primary websites are its primary and definitive repository of accurate information about the City. These sites include but are not limited to CharlotteNC.gov, CharMeck.org, ridetransit.org, cmpd.org, and Charlotteairport.com.

As a rule, City communications posted to social or mobile media sites should also be available on the City’s main websites or contain links directly to the City’s main websites.

2. Prohibited Uses of Social Media

Whether an employee is using social media for personal or official City use, the following are strictly prohibited at all times whether on or off duty and whether using a City or a personal device. This is a representative list and does not include all prohibitions that would violate City policies and procedures.

- Disclosure of confidential information to which an employee has access as part of the employee's role or duties. Examples of such information are a vendor's patented information of which the employee has knowledge due to his/her assignment on a City project; personal, confidential or health information about someone; billing information of customers compiled and maintained by the City; any data collected from a person applying for financial or other types of assistance including, but not limited to, their income, bank accounts, savings account, etc.
- Disclosure of non-public information or legally protected personal information to which an employee has access or has obtained from the City such as someone's address, date of birth, driver's license number, social security number or other personal information.
- Comments about a co-worker, supervisor or any other City employee that are defamatory, vulgar, obscene, threatening, intimidating, harassing or in violation of the City's policies against discrimination, harassment or hostility based on race, religion, color, sex, national origin, sexual orientation, age, disability, political affiliation or on the basis of actual or perceived gender expression through dress, appearance or behavior or any other protected class or characteristic.
- Information related to unlawful activities including, but not limited to, the use, sale or distribution of illegal substances.

3. Personal Use of Social Media

Personal use is defined as use of social media by an employee speaking as an individual. Personal use of social media by a City employee is permitted for social or professional networking purposes. In personal use, the employee is speaking as an individual and not on behalf of the City of Charlotte.

An employee's use and comments made on social media sites are subject to limited First Amendment protections. As a public employee, use of social media is considered an extension of the workplace as it relates to employee conduct.

As a City employee, personal use of social media is subject to these guidelines:

- Where personal use is related to a matter of public concern, it must be conducted in such a manner that a reader would not think the employee is speaking for or on behalf of the City.
- Employees must comply with City policies, including but not limited to Human Resources Standards and Guidelines, the Employee Handbook, the Code of Ethics, [Computer Network and Internet Access Policy](#) and the Protection of Restricted Data Policy.

- Employees should exercise sound judgment and discretion so as not to reflect adversely on the City in contributing to social media sites.
- Personal use of social media may not violate or infringe upon the right of any other person or entity or constitute a criminal offense or create civil liability.
- Personal use of social media while on duty, including during breaks, must not be excessive such that it interferes with the employee’s work or work of others.

Inappropriate personal usage of social media may be grounds for disciplinary action, up to and including termination.

4. Official Use of Social Media:

City departments are encouraged to create and use a social media site to support their services and operations. Departmental engagement in social media is subject to the provisions of this section that include a Social Media Action Plan (4.1), Requirements of Social Media Sites (4.2), Official Use Guidelines (4.3), and Guidelines for Public Comment (4.4).

4.1 Social Media Action Plan

Departments shall submit a Social Media Action Plan to the Web Governance Committee. The purpose of the Social Media Action Plan is to ensure that a business case has been made to warrant the public resources being devoted to the social media site and that its objectives are consistent with the City’s community engagement strategy.

A department’s social media action plan shall include the following:

- Designation of City employees who are approved for official use of social media as spokespersons for the department.
- *Goal and Objectives* of the site or application.
- *Strategy*: Describe how use of the social media supports a larger departmental communications plan or initiatives related to the community engagement strategy. Identify audiences, messages and other tactics.
- *Site Manager*: List a primary contact for the social media site and list all employees authorized to post on the site.
- *Service Delivery & Response*: Outline the plan for fulfillment of service requests that may come in via the site or how responses will be made. Include timeframes for responses.
- *Implementation and Resources*: Include an implementation plan as well as process for managing site accounts such as frequency and protocol associated with posting information.
- *Passwords and Authorizations*: Provide all authorization information necessary for Corporate Communications & Marketing to gain access to social media sites for updates or postings in the absence of the site manager.
- *Public comments*: Determine whether public comments will be permitted and how such comments will be displayed. See Section 4.4 Public Comments.

4.2 Requirements for Social Media Sites

City social media sites and applications, regardless of date of establishment or whether maintained internally or externally, must adhere to City policies and protocols. These include the following:

- *Communications Standards:* All tools must maintain corporate standards in the use of City logos. Variations of the standards can only be approved by Corporate Communications & Marketing.
- *Best Practices:* Use of social media sites shall meet best practices for maintaining social media such as but not limited to frequent updates and accurate information.
- *Public Records and Retention:* All sites are subject to state of N.C. public records laws and retention and shall be based on standards for other public records. *Web Policy:* ex. Linking guidelines/privacy/accessibility.
- *Accessibility:* All sites shall adhere to City web policy concerning linking, privacy and guidelines for accessibility for the disabled.
- *Political Activity:* The social media sites shall not contain any political information or be used for political activity.
- *Internet Security Policies:* All sites shall comply with City policies and procedures for information security.
- *Conduct:* City policies, rules, regulations and standards of conduct apply to employees who engage in social activities while conducting City business.
- *Privacy:* Information created for or posted on social media sites by City employees shall comply with all privacy protection laws to protect the privacy of employees, privacy of citizens and the confidential information that the City maintains.
- *Other Laws:* Sites also shall adhere to all copyright, public records, retention, fair use and financial disclosure laws and other statutes that might apply to the City or department.
- *Third-Party Citations.* Information created for or posted on social media sites by City employees shall not contain citations of vendors, suppliers, clients, citizens, co-workers or other stakeholders without their explicit permission.

Violation of any of these policies could result in the removal of the social media site and/or individual disciplinary action.

4.3 Official Use Guidelines

When a City employee is designated by a department as for official use of social media, the employee shall follow these guidelines.

- *Identify oneself and capacity:* When City-related matters are discussed in one's official capacity, each employee must identify himself/herself and the role held at the City. It is important to clearly articulate when speaking for oneself, when giving an opinion and/or when speaking on behalf of the City. Only speak on behalf of the City when the commentary is permitted under the department's Social Media Action Plan.

- *Employees are personally responsible for what they publish:* Be mindful that information published in social media constitutes a public record and as such will be retained per the regulations of public records law.
- *Be transparent, admit mistakes and respectfully differ:* Promptly admit to and correct mistakes, and do not enter into verbal altercations. Stick to facts when correcting users who have made misrepresentations about the City, using only City sponsored social media sites to provide correct information.
- *Use good judgment:* If the content of what is being published or posted causes discomfort, pause, review and edit the submission; if discomfort remains, discuss it with the department manager before posting.
- *Adhere to all of the same prohibitions that are included in Section 3. Personal Use of Social Media.*

4.4 Public Comment Guidelines – Including the Blockage of and Removal of Comments

City social media sites that permit public comments/postings shall include the following disclaimers:

- Views and opinions expressed are those of the authors and do not reflect those of City of Charlotte officials and employees.
- People who comment shall have no expectation of privacy. Their comments are public records retained and subject to disclosure in accordance with applicable laws and City policies.
- City social media policies are subject to amendment or modification at any time without prior notice.
- Multiple violations of comment standards may result in a public user's comments/postings being banned from City social media sites.
- Limitations may apply to public users. For example, users should be cautioned not to use the site for emergency purposes if the department does not monitor public comments/contacts on a 24-hour-a-day, 7-day-a-week basis. Similarly, users should be cautioned not to use the site when another form of filing and notification or request is required.

All comments/postings shall be retained in accordance with City policies.

Public comments from City social media sites may be blocked, hidden or removed as long as the site manager develops content-neutral comment standards that are included in its Social Media Action Plan.

All comments/postings that are blocked, hidden or removed from City social media sites shall be retained until such time as the City Attorney's Office advises otherwise.

Content-neutral comment standards includes notice that the site is a moderated online discussion site, and that while comments/postings will not be blocked, hidden or removed from the site

based strictly on their content generally, the City reserves the right to block, hide or remove comments/postings that contain the following:

- Vulgar, abusive or threatening language, defamatory statements or nudity in profile pictures or attachments.
- Personal attacks, hate speech or offensive terminology targeting individuals or groups of individuals.
- Suggestions or encouragement of illegal activity.
- Unsolicited business proposals or endorsements/promotion of commercial services, products or entities.
- Infringements of copyrights, trademarks or other intellectual property.
- Endorsements of political parties, candidates or groups.
- Off-topic comments/posts, spam or links to unrelated sites.

5. Oversight of Social Media Sites, Policies & Use

The City Manager has delegated oversight of the City’s use of social media as follows:

The Web Governance Committee is responsible for reviewing and approving departmental Social Media Action Plans. It will review requests for new social media sites to ensure the tools are implemented as effectively and consistently as possible across all City departments. This includes approval for individual employees to engage in social media as City employees and as an official part of their duties.

Corporate Communications & Marketing maintains a list of social media sites approved for use by the Web Governance Committee and will expand or contract the list as social media evolves. Corporate Communications & Marketing will also monitor all City social media sites to ensure adherence to the policy and reserves the right to remove pages or close sites if necessary.