MANAGEMENT POLICIES AND PROCEDURES	
Social Media Communications	**Number: 213**
Approved by: Andrew Clinger, City Manager	**Effective Date: September 9, 2011**
	Page 1 of 14

I. PURPOSE

The purpose of this policy is to provide uniform guidelines by which information regarding City activities, issues, initiatives, and policies will be disseminated using social media tools; to provide guidance for employee use of social media; to outline the City's policy for assessing and managing comments and replies posted on City of Reno social media assets; to provide guidance on the use of linked websites; and to describe the procedures for retaining records of social media posts.

II. REVISION HISTORY

12-02-10 Adopted
09-09-11 Revised

III. REFERENCES

The procedures outlined in Section VIII, Paragraph B in policy number 104, "Workplace Monitoring," apply to the activities described in this policy. Both the "Computer Usage" (303) and the "Electronic Data Transmission" policies (304) apply to the following, in their entirety. The definition of "Internet," Item VI (E) in policy number 304, is construed to include all social networking tools as described below.

Activities described below will also be held to the standards of policy 306 "Website Protocol," as they apply to social media assets, which will be considered an extension of the City's website for this purpose.

Information released under this policy must conform to "Media Communications and Release of Public Information" policy number 201. All City communications, including those related to social media, should be developed within the guidelines in the current Strategic Communications Plan. The City's current Crisis Communications Procedures and Emergency Communications Procedures supersede the procedures described herein, when appropriate.

Websites created by the City shall comply with the American's with Disabilities Act and Policy No. 602. Records of City postings and comments to City social media locations shall be retained in conformance with the Records Retention Schedules, Policy No. 207. This policy incorporates all standards of conduct included in both the "Ethical Standards"

(101) and "Rules of Conduct and Delegation of Disciplinary Authority" (102) policies. Employees may be subject to discipline resulting from their use of personal social media where that use has a negative impact on the City's interests which outweighs the employee's private interests.

IV. FIRST AMENDMENT PRINCIPLES

In addition to other applicable laws, social media issues may implicate First Amendment rights. This section is intended to provide general guidance on First Amendment principles. Consult the City Attorney's office to seek further legal guidance. Most City social media sites should be designed to be either government speech or limited public forums.

Government Speech. Where the City intends to convey its own message, third parties' First Amendment rights are seldom an issue. Speech may be "government speech" where 1) the message furthers some City interest, 2) the City controls the message, and 3) the City is the messenger or controls the messenger and/or message. Where the City uses a third party to convey the City's message, it is still government speech provided the City exercises effective control over the selection and dissemination of the message. For instance, a link to the website of another governmental entity or a private entity's City sponsored activity describing the activity would still constitute government speech, provided the message on the link is what the City wishes to convey, the City retains the right to reject websites, and the City actually reviews a website before consenting to include the link on the City's website.

Forum Analysis. However, when the City opens up a place or means of communication to outside messages, those third party messages are usually not government speech, and may be entitled to different levels of First Amendment protection. How much protection depends on different factors, most importantly, what type of "forum" is created by the City.

A. Traditional Public Forum. Speech in parks, sidewalks and streets enjoys highest levels of protection. Regulation of content is only allowed to further a compelling City interest. Regulation of time, place and manner of expression are permitted if they actually further a significant governmental interest, are narrowly tailored so as not to interfere with more speech than is necessary, the speaker has alternative means of conveying his or her message, and adequate standards prevent arbitrary enforcement that lends itself to content discrimination.

B. Designated Public Forum. The City may intentionally open up a forum to third party communication. An example would be opening an unrestricted feedback section to the public on a website. The standard for

regulating speech in a designated public forum is the same as in a traditional public forum. This is analogous to Public Comment at City Council meetings. Examples of allowable regulation include limiting the number of words or prohibiting obscene language and threats. If a designated public forum is created, any City personnel with the ability to censor communication should be very familiar with First Amendment limitations and consult the City Attorney's Office when in doubt.

C. Limited Public Forum. In a limited public forum, the City creates a channel for a specific or limited type of expression where one did not previously exist, and may reserve the forum for certain groups or for the discussion of certain topics, subject only to the limitation that its actions must be viewpoint neutral and reasonable in light of the purpose served by the forum and all surrounding circumstances.

However, as a cautionary note, where the City intends to create a limited public forum, but fails to properly limit it, or fails to enforce those limits, it may result in the forum becoming a designated public forum.

D. Non-Public Forum. The City may create a non-public forum for a particular purpose or for specific participants, as long as the regulation on speech is reasonable and not an effort to suppress expression merely because public officials oppose the speaker's view. An example is web content that is open only to City employees, or to certain employees within the City.

Non-Work Related Conduct. Employees can be disciplined for non-work related conduct, such as web use, emailing, SMS messaging, or posting inappropriate pictures or videos taken with a personal cell phone while performing official City functions to a social media site, if it becomes public knowledge and the governmental interest asserted to justify its disciplinary action is greater than the employee's First Amendment rights or other interests.

See, generally: *Sutliffe v. Epping Sch. Dist.*, 584 F.3d 314 (1st Cir. 2009); *Page v. Lexington Co. Sch. Dist. One*, 531 F. 3d 275 (4th Cir. 2008); *Dible v. City of Chandler*, 515 F.3d 918 (9th Cir. 2008).

V. PERSONS AFFECTED

All City employees and vendors.

VI. POLICY

The City of Reno recognizes the value of social media for reinforcing brand recognition, engaging constituents and employees in conversation, and for delivering information to the public. The City intendeds to leverage the power and reach of social media to communicate and deliver messages directly to citizens and to encourage citizen involvement, interaction and feedback.

Because the City supports open dialogue and the exchange of ideas, this policy has been created to provide guidelines for staff involved in the use of social media. To best manage online relationships and conversations, only those officially designated by the City of Reno (see "Media Communications and Release of Public Information" policy number 201) have the authorization to speak on behalf of the City.

Given the immediate nature of these tools, the City will take a controlled, strategic approach to the use of social media to ensure information is current and appropriate and that responses to constituent requests and questions are accurate and timely.

Employees involved in social media management are responsible to know and uphold the City of Reno's rules of conduct and ethical standards.

VII. DEFINITIONS

A. Author—An employee who creates content for any communications media employed by the City of Reno.

B. Blog—A contraction of the term "weblog," blogs are websites that contain regular entries of commentary, descriptions of events, or other material such as graphics or video.

C. Comment—A post made in response to a particular blog entry or post on a social media site or forum.

D. Forum—An Internet forum, or message board, is an online discussion site using web applications managing user-generated content, or posts.

E. Microblog—Online services that limit the size of posts. Twitter, for example, limits posts to 140 characters.

F. Post—An entry in a forum, social media site, or blog by an author.

G. Profile Picture—An image that represents the profile owner or user.

H. Social Media—Any website or electronic medium that allows for communication, accessible to anyone via the internet. Examples of social media sites include: MySpace, Facebook, YouTube, Flickr, LinkedIn, Wikipedia, Digg, Reddit, Delicious, StumbleUpon, and Twitter.

I. Spam—Spam is an abuse of electronic messaging systems by sending unsolicited bulk messages.

J. SMS—Short Message Service (SMS) is a standardized communications protocol allowing the exchange of short text messages between mobile telephone devices.

K. User—A duly registered participant in a social media website.

L. Wiki—A collaborative software program or platform that allows web pages to be created and collaboratively edited using a web browser.

VIII. RESPONSIBILITIES

A. The City Manager's Office, through the Public Information Division of Neighborhood Services, is responsible for acting as the City's central public information center; for coordinating the release of information to the public through all available avenues; for selecting, testing, and implementing the use of communications tools, including social media; and for monitoring and responding to public comments, questions, and requests.

B. The Director of Neighborhood Services is responsible for the selection and approval of social media tools for communication with the public about City activities, programs, and policies, accepting the legal terms and conditions on behalf of the City, and setting standards for creating accounts.

C. The Web Services Program Manager reports to the Director of Neighborhood Services and is responsible for supporting and managing social media tools and social media communications, including necessary software and integration into the City's websites, and for coordinating outbound messages on Reno Connect and various social media, as assigned.

D. The Community Relations Program Manager and Public Information Officer report to Director of the Neighborhood Services and are responsible for developing content for use in social media communications related to the City of Reno and for monitoring and responding to public feedback.

E. The Community Relations Program Manager is also responsible for managing and posting City of Reno video assets to appropriate social media outlets.

F. The Reno Direct Call Takers report to the Director of the Neighborhood Services and are responsible for creating and monitoring service requests in response to inquiries generated through social media tools. Staff within the Reno Direct program may also support these activities by monitoring and responding to comments and questions, and by entering service requests based on social media interactions.

G. Department Directors may assign staff additional duties as content editors for social media for official City of Reno social media assets or, upon approval of the City Manager's Office, to manage appropriate departmental social media assets.

H. The City Attorney's Office, upon request, is responsible for reviewing the legal terms and conditions required for creating a social media account and for determining what information is confidential, privileged or otherwise exempt from public disclosure.

I. City Employees are responsible for posting to City of Reno social media assets only if assigned to do so by the appropriate authority within this policy or the "Media Communications and Release of Public Information" policy number 201; and for conducting their personal social media activities in conformance with the "Ethical Standards" (101) and "Rules of Conduct and Delegation of Disciplinary Authority" (102) policies.

IX. PROCEDURES

A. Social Media Communications on Behalf of the City of Reno

1. Selection of Social Media Assets

   a. The asset must be accessible to anyone above the age of 18 and available free of charge to users. No site that limits access to services based on race, ethnicity, religion, sexual orientation, or physical ability shall be used by the City.

   b. Accounts set up for the purpose of communicating with residents on behalf of the City must be created by the City and identified with the name "City of Reno" and use either the arch profile picture or the City logo.

   c. City representatives who set up account profiles should use a City email account (@reno.gov), City or department name, and a City office phone number. All profiles should provide a link to the City's website (www.reno.gov) and include the Reno Direct number (334-INFO) if possible.

   d. Profiles, networking sites, blogs, or other social media assets should have comments limited to authorized users of those sites or require registration to discourage anonymous posts and comments.

   e. Departments wishing to create and manage department-specific social media assets, such as a blog or wiki, should fill out a Social Media Asset Form (available on CORE) and submit it for approval by the Director of Neighborhood Services. The form includes log in documentation so that Public Information personnel can access, monitor, and edit all City-owned assets.

2. Content Development

   a. To ensure efficient use of resources, content developed for social media uses should be located on and linked to the City's official website (www.reno.gov) whenever possible.

b. All content, including photos and videos, must be owned by the City or have the appropriate release or authorization from the copyright holder.

c. Content related to crisis or emergency communications must conform to the policies and procedures contained within the relevant plans.

3. Design and Branding

a. All profiles and pages should be clearly identified as official City of Reno assets, using the arch profile picture or City logo as the identifying image.

b. Profiles and pages should be designed to emulate the City's website, if possible. Otherwise, design colors should be consistent with the official colors in use by the City, as identified in the current Identity Manual, available on CORE.

c. When possible, third-party advertising should be removed or disabled on official City social media pages. If this is not possible, a statement should be added to the effect that the City did not authorize or endorse any advertisement on the site.

4. Management and Monitoring

a. Public Information staff, as assigned by the Director of Neighborhood Services, will make use of available and appropriate online monitoring tools to ensure conformance with this policy, quality, and consistency.

b. Login information, including user name and passwords, must be submitted to the Web Services Program Manager and kept on file.

c. Staff should monitor the list of users who voluntarily "follow" or "friend" our social media assets to ensure that spam, obscene material, material not within the authorized scope of a limited public forum, or strictly commercial messages are not

introduced into the City's communications. Users fitting those categories should, where possible, be given a warning that continued introduction of such messages will result in their access being blocked; followed by blockage where the warning is ignored.

d. Staff should develop and post the purpose of the communications channel somewhere on the site where it is located, clearly identifying the types of comments that are appropriate for that channel, and providing warning that comments or posts not fitting the policies contained in Section C below will be deleted.

B. Use of Social Media by Employees

1. Use of Social Media as an Authorized City Representative

a. As a representative of the City or one of its departments, each employee engaged in social media should take responsibility for what they write, identify themselves as the author, and exercise good judgment and common sense.

b. It is appropriate and desirable for City employees to engage in professional networking and training opportunities through social media. Requests for access to appropriate sites should be made to the Department of Communications & Technology.

c. When posting or responding to posts as a City representative from their personal accounts, employees should always include their name and, when appropriate, title and identify themselves as a City employee. When posting from an official City of Reno account, they should identify themselves when appropriate or if asked.

d. When an employee participates in a blog, wiki, online social network, or any other form of social media as a representative of the City, certain standards of conduct apply:

1. City representatives should always show respect. Avoid ethnic slurs, personal insults, obscenity, or any conduct that would not be acceptable in the City's workplace. Show

consideration for others' privacy and for topics that may be considered objectionable or inflammatory—such as politics and religion.

2. Employees should avoid engaging in arguments, be the first to correct their own mistakes, and indicate if they have altered previous posts.

3. All content and posts should be designed to add value. Employees should strive to provide worthwhile information and perspective.

e. The City promotes transparency and honesty in communications and therefore employees may not post anonymously or use pseudonyms or misleading screen names when representing the City.

2. Guidelines for Private Use of Social Media

a. Confidential, proprietary and non-released City information should not be included in employee's private social media activity. Private and personal information, pictures, and video about or depicting City employees, contractors, customers and constituents gathered through the employee's professional activities must never appear online or be distributed by email or through SMS messaging.

b. An employee's public image in social media, which can be associated with the City, should meet the standards of the workplace rules of conduct. Offensiveness, disparaging comments, untruthful statements, demeaning behavior, nude or obscene pictures and/or video, and illegal substance use are all examples of behavior that is considered inappropriate by representatives of the City of Reno.

c. If an employee has a personal profile on a social media site or has a personal weblog, they should not work on them during their scheduled work time, excluding breaks.

d. For employees with personal blogs and profiles:

1. If an employee can easily be identified with, or identifies themselves as, a City of Reno employee on their blog or other

social media profile, they should make it clear to their readers that the views expressed in their blog entries do not necessarily reflect the City's views. To help reduce the potential for confusion, the following notice—or something similar—should be put in a reasonably prominent place on their site: "The views expressed on this blog are mine alone and do not necessarily reflect the views of my employer, the City of Reno."

2. Employees should work with their direct supervisor if they have any questions about what is appropriate to include in their blog.

3. Employees are encouraged to be respectful to the organization, fellow employees, residents, and other agencies.

4. Employees not acting in their official capacity shall not represent or give the impression that they are acting in their official capacity.

e. Monitoring personal social media, including microblogging, SMS, text messaging, or instant messaging accounts should not interfere with an employee's work for the City.

C. Comments & Replies

1. To encourage engagement and increase transparency, it is the City of Reno's intent to leverage social media as a method of two-way communications. To that end, when the appropriate resources are available, comment and forum features will be activated to allow users to make comments, ask questions, or request services.

    a. When activated, comments and forums should be reviewed every work day, before noon.

    b. Staff will assess the content of each post or comment to determine it meets the standards described below or if it requires a response from the City.

c. Posts or comments requiring a response will be answered with a status of the response within 16 work hours (two work days) and with the full response within five work days. Whenever possible, responses should be made immediately.

d. Posts or comments requiring a service request will be submitted to Reno Direct for inclusion in the customer relationship management system.

2. City employees should immediately remove any comment which violates any local, state, or federal law regarding discrimination, harassment, or violence.

3. In a designated public social media forum created by the City, the City shall delete or reject posts from users that contain content that is obscene, threatening, harassing, maliciously defamatory, copyrighted or commercial.

4. In a limited public social media forum created by the City, in addition to any other limitations imposed on the specific site by the City, the following posts or comments shall be removed or deleted:

   a. Obscene, vulgar, threatening, harassing, or maliciously defamatory comments.

   b. Comments not related to the specified subject or, although portions relate to the specified subject, include substantial unrelated material;

   c. If applicable, comments from persons or groups not within the permitted commentator group or other limitations of the limited forum;

   d. Comments promoting or opposing any person campaigning for election to a political office or promoting or opposing any ballot proposition;

   e. Comments promoting or advertising a business or commercial transaction or containing copyrighted material; or

   f. Overtly self-promoting comments.

5. Comments shall not be deleted or removed based upon the views expressed. Comments will not be edited. Applicable limitations should be posted on the social media site. Hyperlinks may be prohibited in their entirety, or they may be deleted or removed where the linked site includes material falling within the above listed prohibitions.

6. Unless the City specifically states on a social media system that communications on that specific system shall be considered as official communications with the City for a specific purpose, communications made through a social media system will in no way constitute a legal or official notice or comment by or to the City or by or to any official or employee of the City for any purpose. For example, a post or comment that asks that the City provide public records will not be considered a public records request until being sent through the proper channels. Likewise, a social media post or comment related to a business license application or building permit will not be considered by the City. Comments specific to a City license, application, permit, project, etc., should be submitted directly to the appropriate City official, department or division, as indicated at www.reno.gov.

D. Linking Policy and Disclaimer of Endorsement

1. The City shall review and reserves the right to reject any hyperlink to a site not maintained by the City.

2. If any hyperlink to a non-City site is posted by the City or permitted in a comment, the City social media site should note that any link to a site which is not the City's site, is provided solely for our constituent's information and convenience, and may include views not necessarily those of the City. Further, that the City does not control or guarantee the accuracy, relevance, timeliness or completeness of information contained on a linked website and is not responsible for transmissions users receive from linked websites.

3. Inclusion of hyperlinks should be limited, depending upon the type of social media public forum created:

a. Government Speech; where the City is furthering its own message, the City reserves the sole right to exclude any link and shall only include links which further communicate the City's message.

b. If the City creates a designated public social media forum, links shall be excluded if they contain material or depictions which are obscene, threatening, harassing, maliciously defamatory, copyrighted or commercial.

c. If the City creates a limited public social media forum, links may be excluded entirely, or permitted subject to any limitations listed on the site or stated in subsection 4 to subsection C entitled "Comments and Replies," above.

E. Records Retention

1. Content developers will keep electronic copies of all messages created for and distributed on social media by the City of Reno. Messages posted to the City's newsroom or news blog are archived automatically. Records shall be retained in conformance with the Records Retention Schedules, Policy No. 207.

2. When possible, content developers should avoid creating new material on social media sites. Instead, use existing material from existing websites or previously published documents to ensure that other forms of the information are retained.

3. When deleting comments or posts, staff should save a screen capture as a jpeg of the content and send it to a public information employee in Public Information for archiving.

4. The City should retain copies of the legal terms and conditions required for creating a social media account.