

Contra Costa County
DRAFT – Social Media Policy Administrative Bulletin
4/14/23

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Social media is an important tool that can be used as part of a comprehensive communications strategy for providing time-sensitive information and increases the ability for the County to share its messages to the widest possible audience, including audiences that might not seek information through more established messaging channels like radio and television. Social media can help the County government build trust with the community, solve problems, and provide a better understanding of how County government improves the quality of life for Contra Costa County residents.

This policy establishes guidelines governing the use of social media by Contra Costa County departments and employees for informing the public about County programs and services.

I. Definitions

Blog: A self-published diary or commentary on a particular topic that may allow visitors to post responses, reactions, or comments.

Content: Any text, metadata, quick response (QR) codes, digital recordings, videos, graphics, photos, or links on approved sites.

Page: The specific portion of a social media website where content is displayed and managed by an individual or individuals with administrator rights.

Post: The act of publishing content on a site.

Profile: Information that a user provides about themselves on a social networking site.

Public Record: Includes any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.

Social Media Comment Policy: An external facing social media policy used to set guidelines and protocols for public interaction with County content on social media accounts.

Social Media Representative: A County employee designated to establish and/or maintain a social media account on behalf of the County, departments, or divisions. Each representative must be designated by the department or division before they begin utilizing social media on the County’s behalf.

Social Media: Internet-based technology communication tools with a focus on immediacy, interactivity, user participation and information sharing. These online technologies are operated by non-County

hosted services and are used by the Department. Examples include but are not limited to blogs, microblogs, wikis, social and professional networks, video or photo sharing, and social bookmarking.

- Examples include but are not limited to Facebook (social networking), YouTube (video sharing), Twitter (microblogging), Instagram (social networking), Pinterest (social networking) and LinkedIn (professional networking). Social media should be understood to include any web-based tool that allows for open communication on the internet, including but not limited to micro-blog sites (Twitter,) social networking sites (Facebook, LinkedIn, Nextdoor) video-sharing sites (YouTube,) and image-sharing sites (Instagram).

Terms of Service: The set of rules and regulations a provider attaches to a software service or web-delivered product.

II. Social Media Usage

A. PROCESS FOR POSTING SOCIAL MEDIA: When using social media, County departments shall do the following prior to posting content:

- 1) Have a business purpose in posting the media that clearly serves County objectives;
- 2) Review the Terms of Service for the site where the social media will be posted and, as appropriate, obtain approval from County Counsel and the department's CAO analyst before agreeing to the Terms of Service;
- 3) Check that content to be posted complies with County policies, including but not limited to technology use and personnel policies;
- 4) Ensure federal, state, and local laws are followed, including:
 - a) Copyright law: For example, posting a video, image (including individuals' names or likenesses), or music without receiving a license or authorization may violate copyright law;
 - b) Trademark law; and
 - c) Other third-party rights, including individuals' rights of privacy, are respected.
- 5) Direct any questions regarding legal issues, including compliance with trademark and copyright laws, to the Office of the County Counsel.
- 6) Publish using platform and tools approved by the Office of Communications and Media.
- 7) County departments must reset the social media password after a Social Media Representative is removed as a social media account administrator;
- 8) The Office of Communications and Media reserves the right to terminate any County social media site at any time.

B. INFORMATION POSTED ON SOCIAL MEDIA SITES

- 1) Social media should be used by County departments to communicate with the public, but not for other purposes.

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2) To help prevent errors and liability issues, social media postings should be made by a Social Media Representative for the department who has been authorized to do so by the Department Head. The Social Media Representative shall only post content reflecting the views of the County, not his or her personal views or concerns.

3) If a mistake occurs, the department should correct the mistake as soon as it is made aware of the error. If an earlier post is modified, it should be clear that the posting has been corrected. Consider designating corrections with “Fixed link” or “Fact correction” prior to the correction.

4) County departments must moderate sites that allow posts by outside users.

5) County departments may not post the following content and must remove any such content, regardless of whether posted by the County department or outside individuals:

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization
- Highly repetitive posts that amount to harassment
- Obscenity, profanity, and vulgar language
- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence
- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations
- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

For questions about whether a posting falls within one of the above categories or whether a posting containing content not appearing on the list should be removed, the County department should contact the Office of County Counsel prior to taking action to remove the post.

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- 6) County departments should direct users back to the County’s website when appropriate and possible for further information;
- 7) County departments must use branding, such as logo use, on social media postings;
- 8) County departments should include the Social Media Comment Policy (see Appendix A), indicating the discussion is moderated and inappropriate content will be removed, if the profile settings can accommodate it. If the profile settings cannot accommodate the Social Media Comment Policy, the social media site should include a link to the policy. This Social Media Comment Policy must be included, or a link provided to the policy, on all social media sites.
- 9) Direct or indirect communications between members of a legislative body, such as members of the Board of Supervisors, commissions and/or boards, should be strictly avoided to prevent potential violations of the Brown Act or the Better Government Ordinance. Among other precautions, members of legislative bodies should not respond to, “like,” “share,” resend or otherwise express opinions about any issue within the subject matter jurisdiction of the body.

C. Use of Social Media During Countywide Emergency Events

- 1) In the event of an emergency, County departments should coordinate all social media content with the Office of Communications and Media, unless otherwise directed by the County Administrator.
- 2) To ensure that messages are consistent across the various accounts and platforms managed by the County, with permission of the CAO, County Public Information Officer (PIO) or designee, will take the lead in delivering County emergency information via social media and keep the CAO and the Office of Communications and Media informed.
- 3) Depending upon the incident, communication managers may be asked to point to specific departmental social media sites that will serve as the main source of information.

III. The Public Records Act & Retention of Posted Information

- 1) Information posted on County social media sites is subject to the California Public Records Act. Any content that is related to the County’s business, including a list of subscribers and posted communications, may be a public record subject to public disclosure.
- 2) County departments should retain subscriber information and comments posted by outside users on County sites, including those removed by staff, for the period required by law and in accordance with department policy. In addition, when prohibited content is removed the records must include the name of the staff member who removed the content, and the date, time, and reason the content was removed.

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IV. Employees’ Personal Social Media Accounts: The line between personal and professional, public, and private can be easily blurred in social media. The following guidelines, in addition to those in the County’s Administrative Bulletins, must be followed when using a personal social media account:

- 1) Personal social media accounts cannot be used for page management of County, department, or division profiles. Additionally, staff should not use their personal social media accounts to speak on behalf of the County or to present themselves as County representatives
- 2) Employees with personal social media accounts are prohibited from posting confidential information obtained from the County, such as personnel data, medical information, and attorney-client privileged information.
- 3) When commenting on County business, employees, supervisors, or policies on a personal account, employees should take care to make it clear that their personal opinions are their own and do not represent the official policy position of the County.

APPENDIX A

Contra Costa County’s Social Media Comment Policy:

Social media is an important tool that can be used as a channel for disseminating time-sensitive information and as a communications tool which increases the ability of the County to broadcast its messages to the widest possible audience and include new audiences that don’t rely on traditional media channels.

Social media can help us build our community, improve knowledge, solve problems, and provide a better understanding of how our work impacts the quality of life for residents. This policy governs all sites and websites of Contra Costa County. Public comments expressed on our social media channels do not reflect the opinions of the County, nor do we approve the content of any public postings or commentary on our social media channels. You, as the poster, are responsible for the content of your messages. Our social media channels are limited to discussion of matters related to the County and its mission. We welcome all comments, questions, and concerns about these topics that foster discussion and communication.

To further this goal, the County reserves the right to delete, hide comments, without notice, that contain:

- Electioneering for or against candidates or issues, unless such promotion or opposition is inherently related to discussion of an item posted by the County
- Information affiliated with political campaigns
- Confidential information
- Content that is unrelated to the post or work done by the County
- Threats against any person or organization

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- Highly repetitive posts that amount to harassment
- Obscenity, profanity, and vulgar language
- Promotion of discrimination
- Indication or encouragement of illegal activity
- Advocacy of violence
- Spam or links to unrelated sites
- Promotions of services, products or political candidates or organizations
- Infringement of copyrights, trademarks, or other intellectual property
- Information that may compromise the safety, security, or proceedings of public systems or any criminal or civil investigations
- Personal or sensitive information (social security numbers, credit card numbers, medical information, account numbers, banking information, phone numbers, email addresses, postal addresses, and similar materials).

Continued or egregious postings of this sort may prompt the County to further restrict your commenting on official County social media platforms. The County's use of external social media is provided as a public service.

By commenting, you are subject to the Terms of Service of the host site. Posting comments to this site will grant the County and anyone reading this site permission to copy, distribute, make derivatives, display, or perform the commenter's work.

The comments posted on this site do not reflect the views of Contra Costa County or its elected officials and employees. Reference in any comment to a viewpoint, product, service, entity, or organization is solely attributable to the individual commenter. Comments may not be reproduced for the purpose of stating or implying County endorsement or approval of any viewpoint, product, service, entity, or organization. Inappropriate comments may remain posted for a significant amount of time prior to being noticed and deleted by an administrator; however, this should not be construed as an approval of the comment or an exception to the comment policy.

Comments made through the County's online locations will in no way constitute a legal or official notice or comment to the County or any County official or employee for any purpose. Additionally, emails or messages sent via this site may not be viewed or responded to. Communications with County elected officials, officers and employees should be made through correspondence to their physical addresses or County email addresses.

This policy is subject to amendment or modification at any time to ensure that use of this site is consistent with its purpose as a limited forum.