



# CITY OF LAREDO

## SOCIAL MEDIA POLICY

### A. PURPOSE.

The City has a legitimate government interest in effective, efficient, and consistent communications with the public. While the City's website ([www.ci.laredo.tx.us](http://www.ci.laredo.tx.us)) is the City's primary Internet presence, the City recognizes that, when used appropriately, social media may be useful in reaching a broader audience in furtherance of the City's goals. This policy provides guidance for how the City communicates with employees, residents, visitors, businesses and various audiences through social media platforms.

### B. OBJECTIVE.

The objective of this Policy is to maintain the integrity of the City's presence in social media and to ensure that social media is used appropriately and within City guidelines and policies. Given the multitude of concerns (legal, political, and ethical) raised by social networking (Facebook, Instagram, Twitter, etc.), this Social Media Policy ("Policy") establishes prudent and acceptable practices regarding the City of Laredo's official social media sites.

### C. SCOPE.

This policy applies to all City employees, including temporary employees and volunteers for the City of Laredo when working with social media tools on behalf of the City. However, that this policy does not apply to social media sites established by any of the City's elected officials for campaign or personal purposes. Pursuant to Section 2.06 of the City of Laredo Ethics Code, City staff time shall not be used to establish, maintain, or ***directly promote a city official's private social media accounts***. City officials are further individually responsible by law to ensure compliance with laws pertaining to campaigning, open meetings, open records, and all other applicable laws related to private social media accounts.

### D. DEFINITIONS.

***City Social Media Sites*** – Includes the official (primary) and all department (secondary) pages, sections or posting locations in social media websites established or maintained by an employee of the City who is authorized to do so as part of the employee's job and that are used to communicate with the public on City business.

***Social Media*** – Internet-based technology communications tools with a focus on immediacy, interactivity, user participation, and information sharing. These venues include social networking sites, forums, weblogs (blogs, vlogs, microblogs), online chat sites, and video/photo posting sites or any other such similar output or format. Examples include, but not limited to: Facebook, Twitter (X), YouTube, LinkedIn, Instagram, Pinterest, Periscope, Snapchat, Reddit, Vimeo.

***Social media administrators*** – City employees expressly designated by the City Manager or their department directors to maintain oversight of a social media site. A social media administrator’s authority is limited to the policies and procedures of the City.

#### **E. ESTABLISHMENT.**

Effective as of the date of this Social Media Policy’s initial adoption, any new departmental (secondary) social media site of the City must be approved by the City Manager or his or her designee. No other City social media site is permissible. Requests to establish departmental social media sites must contain an explanation of the business necessity for establishing such a site. Said requests are to be submitted to the Public Information Officer who will review and recommend approval or denial of the request to the City Manager’s Office. Attached as **Exhibit A** is the City’s social media sites in existence as of the date of this Policy.

**F. RESPONSIBILITY.** Each department director is responsible for implementing the provisions of this directive and designating a social media administrator. The Public Information Officer, or his or her designee, shall be the social media administrator responsible for oversight of the City’s official (primary) social media sites. All social media administrators of the City shall:

- (1) Ensure the City’s social media sites are regularly maintained and kept current.
- (2) Ensure that all information posted to a City’s social media site is accurate, professionally presented, respectful, relevant, and on topic with the mission. Care must be taken to ensure that grammar and spelling are correct. Mistakes must be corrected quickly.
- (3) Review information posted to the social media sites to ensure the content is appropriate, professional, and consistent with the City’s policies and the purpose for which the site exists. Frequent review of sites that provide opportunity for comment or other interaction is essential.
- (4) Enroll in and maintain archival third party account.
- (5) Be aware that what is posted will not only reflect on the individual and department, but also on the Elected Officials and employees of the City; using caution and care so that no use of social media results in damage to the organization or reputation of anyone within the City of Laredo.
- (6) Under no circumstance should users be blocked from City social media accounts by anyone other than the Public Information Manager. If suspicious activity is noted, staff should report it directly to the social media platform and to the Public Information Manager. The Public Information Manager, after investigating the facts, may block users only in egregious situations where repetitive sending of any of the following is not reasonably controllable by hiding the material: obscene or pornographic material, threats to any person, profane or abusive language, advertising for a commercial entity, product, or service, the originating account cannot be verified, or responses which are outside the scope or purpose of the account. Any person who has been blocked from a City social media account may appeal this decision in writing to the City Manager within ten (10) days of the date on which they were blocked.

- (7) Before posting or scheduling City social media content, confirm all information shared is accurate, timely, and relevant.
- (8) Carefully consider the information you are sharing, as it is widely accessible. All content (both published and deleted/modified) is subject to open records requests. Once social media posts are published, they become a public record and should not be deleted; this applies to both the City content and any public comments received, even those which may be hidden from view. The City, including social media account administrators and content creators are subject to State and Federal record retention laws.
- (9) If the City's contracted vendor cannot archive messages on a particular platform, content creators should save a screenshot of the communication to be retained on a City system.
- (10) If public comments are enabled and/or inherent to the social media platform, departments shall monitor public comments and respond to those comments that may cause misinformation. Comments that are profane or obscene shall be immediately brought to the attention of that social media platform's administration for review and can be hidden if they are **Inappropriate Comments** as defined herein.
- (11) Some social media platforms include features that allow an administrator to hide comments from public view. Hiding comments is only permitted if the comment is an Inappropriate Comment as defined herein. For purposes of this City of Laredo Social Media Policy an **Inappropriate Comment is defined as a comment which meets one of the following conditions:**
  - Comments or videos that are not related to the post topic;
  - Content that violates the Social Media Platform's terms of service;
  - Information about official city business that is legally deemed confidential and should not be made public;
  - Profane, sexual, pornographic or obscene comments or submissions;
  - Discriminatory comments regarding race, ethnicity, religion, gender, gender identity, disability, sexual orientation, political beliefs, or any other form of discrimination directed toward a person, people, or group based on a protected class as per Title VI, Civil Rights Law;
  - Attacks on specific groups or any comments meant to harass, threaten, or abuse an individual;
  - Information that may compromise the safety or security of the public or public systems;
  - Solicitations of commerce and advertisements. This includes promotion or endorsement of any financial, commercial, or non-governmental agency;
  - Political advocacy or commentary;
  - Comments that suggest or encourage violence, illegal activity, or threaten any person;
  - Content that violates a legal ownership interest of any other party;
  - Content that includes personally identifiable information within their comments, including addresses, telephone numbers or email addresses; or
  - Spam, link baiting, or files containing viruses that could damage the operation of other people's computers or mobile devices."
- (12) Respond to comments or messages promptly, especially if a question is asked. Use

discretion when engaging with unsolicited and/or controversial content and ensure the City's response is professional and neutral, using only appropriate language that is not foul, derogatory, disrespectful, inaccurate, threatening or considered harassment. Avoid inserting opinions in a comment thread, and be respectful when a response is necessary to clarify information.

- (13) A City employee posting on a City social media account makes posts representative of the City. Refrain from the expression of personal opinions or positions regarding policies, programs, or practices of other public agencies, political organizations, private companies, or non-profit groups.
- (14) Refrain from the expression of personal positions regarding City employees, policies, programs or practices, and opinions of other public agencies, political organizations, private companies or non-profit groups.
- (15) Ensure comments do not violate the City's privacy, confidentiality, or legal guidelines for external communication. Never comment on anything related to legal matters, litigation, or any associated parties without the appropriate approvals, and be mindful of "no contact" periods for contract awards. Do not provide information related to pending business decisions that would compromise negotiations or including such as part of content added to an account.
- (16) Information that is proprietary, attorney-client privileged, subject to state or federal privacy laws, and information not subject to disclosure under the Texas Public Information Act should NOT be posted on a City social media account. Any questions concerning this standard should be directed to the Public Information Office and City Attorney.
- (17) Ensure content is compliant with Texas Election Code and City ethics.

## **G. LIMITED CONTENT OF CITY SOCIAL MEDIA SITES**

The City's social media sites must be structured narrowly to focus discussions on a particular interest of the City rather than creating a "public forum." Each City social media site shall include an introductory statement which clearly specifies the purpose and topical scope of the blog and social network site. **The City reserves the right to restrict or remove any content that is deemed in violation of this policy or any applicable law.** Information that is proprietary, subject to the attorney-client privilege, or privacy laws, and information not subject to disclosure under the Texas Public Information Act, shall *not* be posted on any City social media site.

Comments from the public are allowed on the City's social media sites and shall be monitored daily to ensure the comments are not in violation of this Policy. Social media sites that allow comments must contain the following text on the site itself or must include a link to the location on the City's website containing the following text:

- (1) “City’s Comment Policy. The purpose of this site is to present matters of public interest in the City of Laredo, Texas. We encourage you to submit comments, but please note that this is not a traditional public forum. Comments posted to this page will be monitored.
- (2) Comments posted by others to the City’s social media accounts don’t necessarily reflect the views or position of the City. “Follows” from a City social media account do not reflect endorsements. The City of Laredo’s social media accounts are designated/limited forums.
- (3) In addition to each social media channel’s individual Content Code of Conduct, the City’s Public Information Office reserves the right to use its discretion to enforce the rules contained in its Social Media Policy. We highly encourage the public to be mindful of the content and comments they post. Any of the following content and comments are subject to being hidden or removed:
  - Comments or videos that are not related to the post topic;
  - Content that violates the Social Media Platform’s terms of service;
  - Information about official city business that is legally deemed confidential and should not be made public;
  - Profane, sexual, pornographic or obscene comments or submissions;
  - Discriminatory comments regarding race, ethnicity, religion, gender, gender identity, disability, sexual orientation, political beliefs, or any other form of discrimination directed toward a person, people, or group based on a protected class as per Title VI, Civil Rights Law;
  - Attacks on specific groups or any comments meant to harass, threaten, or abuse an individual;
  - Information that may compromise the safety or security of the public or public systems;
  - Solicitations of commerce and advertisements. This includes promotion or endorsement of any financial, commercial, or non-governmental agency;
  - Political advocacy or commentary;
  - Comments that suggest or encourage violence, illegal activity, or threaten any person;
  - Content that violates a legal ownership interest of any other party;
  - Content that includes personally identifiable information within their comments, including addresses, telephone numbers or email addresses; or
  - Spam, link baiting, or files containing viruses that could damage the operation of other people’s computers or mobile devices.”

Comments violating the City’s Comments Policy shall be removed promptly. When a person’s comment is removed, the City should try to post a reason for removing the post (i.e. “A comment to this post was removed because it endorsed a political candidate. This is in violation of the City’s comment policy ([link to policy](#))”). Removed comments shall be archived by a third party service provider, at the time of the policy adoption the City has a contract with Archive Social. The City further reserves the right to remove or block repeat individual violators from commenting on any of the City’s social media sites.

## **H. SECURITY.**

Applications (such as streaming video, music, photos, subscriptions to RSS feeds) can cause clutter

and security risks to a social media website. An application may be removed if not determined to serve a City purpose and/or or does not come from a trusted source.

## **I. RECORDS RETENTION AND PUBLIC INFORMATION.**

- (1) Pursuant to Section 441.158 of the Texas Government Code, the Texas State Library and Archives Commission promulgates records retention schedules for records of local governments. The City has schedules and policies for retention of its records. The retention period for a record depends on the content of that record, regardless of the medium in which it is maintained. The general guidelines for archive, capture, and retention of social media content is attached hereto as **Appendix B**. The Public Information Officer and the Departments maintaining a City social media site shall preserve records on a City server for the required retention period in a format that preserves the integrity of the original record and is easily accessible.
- (2) The City of Laredo social media sites are subject to the Texas Public Information Act (TPIA), found in Ch. 552 of the Texas Government Code. Content in City social media, including a list of subscribers and posted communications, is public record. Users of City social media sites shall be notified that public information requests must be directed to the City Attorney's Office as the designated City Public Information Coordinator. Content submitted for posting that is deemed not suitable for posting by the City of Laredo because it is not topically related to the particular social media site objective being commented upon, or is deemed prohibited content based on the criteria in E (2) of this policy, shall be retained pursuant to the records retention schedule along with a description of the reason the specific content is deemed not suitable for posting.

## **J. GENERAL GUIDELINES FOR PARTICIPATION IN SOCIAL MEDIA.**

The City of Laredo understands that social networking and Internet services have become a common form of communication in the workplace and among stakeholders and citizens. Employees that choose to participate in social media while a City employee should adhere to the following guidelines.

- (1) City policies, rules, regulations and standards of conduct apply to employees that engage in social networking activities while conducting City business. Use of a City e-mail address and communication by a city employee in his or her official capacity will constitute conducting City business.
- (2) Employees who participate in social media outlets on or off-duty are subject to the same standards for such communications as set forth herein.
- (3) Although minimal personal computer usage is allowed during the work day for employees, participating in non-work-related social media outlets while on duty is assumed to impact productivity and cause performance issues and therefore is prohibited. This notwithstanding, the City may allow employees to participate in existing social networking sites as part of their job duties.
- (4) Confidential or proprietary information or similar information of third parties who have shared such information with the City of Laredo should not be shared on social media

outlets.

- (5) Employees shall follow all copyright laws, public records laws, retention laws, fair use and financial disclosure laws and any others laws that might apply.
- (6) Employees shall not use their City email account or password in conjunction with a personal social networking site.
- (7) Employees shall not cite vendors, suppliers, clients, citizens, co-workers or other stakeholders without their approval.
- (8) City resources, work time, social media tools, or a City employee's official position shall not be used for personal profit, business interests, or to participate in political activity. For example, a building inspector may not use the City's logo (or its likeness), email, or work time to promote a side business as a plumber.
- (9) Personal or business venture social media account names shall not be in any way tied or similar to the City. For example, City of Laredo Cop would not be an appropriate personal account name.

**APPENDIX A**

**EXISTING SOCIAL MEDIA SITES**



## **APPENDIX B**

# **GENERAL RECORDS RETENTION GUIDELINES**

### **CORRESPONDENCE GR1000-26**

- **General – 2 years**

### **COMPLAINTS GR1000-24**

- **Resolution + 2 years**

### **Advertisements of Upcoming Events -3 Tex. Admin. Code § 6.91(8) (2000)**

- **No archival, capture, or retention required.**

**(Information shared that is cursory and minimal with no lasting importance or need beyond its initial purpose of informing do not require capture and retention).**