



MEMORANDUM

Date: September 14, 2017

To: The Honorable Chair and Members
Pima County Board of Supervisors
Presiding Judge, Superior Court
Elected Officials
Appointing Authorities

From: C.H. Huckelberry 
County Administrator

Re: **Updated Administrative Procedure 3-31, Pima County Social Media Procedure**

Attached is updated Administrative Procedure (AP) 3-31, which governs County staff use of social media.

The major change to this AP is improved guidance regarding the types of content prohibited in these public forums and a deliberative process for removing content or restricting users, including adding a right to appeal to the County Administrator's Office. Minor revisions include requiring departments to adhere to County branding guidelines, adding the Communications Office to administrative control of Public Library social media accounts, and centralizing the purchase of social media content and advertising in the Communications Office.

There has been a great deal of debate and confusion the past few years – within the County and around the country – over moderation of content posted on government social media accounts. Recent legal opinions have begun to bring some clarity to the matter. What is clear is that social media applications create and foster public debate and discussion. They are public forums; and as such, the County has a responsibility to provide proper oversight of these forums so that every member of the public wishing to participate can do so without fear of being bullied, harassed or exposed to vulgar or abusive content. This AP sets rules of decorum similar to the restrictions the County enforces elsewhere and which are sanctioned by state and federal courts, including the United States Supreme Court.

There are more than 40 County social media accounts, and each account has several County staff members responsible for administering those accounts and monitoring the content. Under the previous version of AP 3-31, enforcement of rules of decorum varied from account to account, depending on the interpretation of the rules by the administrators. Such resulted in some content being tolerated on one County account, but not tolerated on another. The revised AP gives the Communications Office primary authority for moderating content on County social media and creating a system of review, warning, sanction and appeal. This system will give members of the public who are violating rules of decorum fair warning so they can edit their

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content and continue to participate in the public forum. However, if content that violates the rules of respectful and fair debate is not revised and is subsequently removed by the Communications Office, the person posting the content will be able to appeal that decision to the Chief Deputy County Administrator. This appellate process will serve as a check on the Communications Office to ensure the rules of decorum are fairly, reasonably and uniformly applied. The Communications Office is also required to document each instance of content or user moderation.

The intent of this revised AP is not to restrict public participation in County social media; rather, its purpose is to encourage as many people as possible to interact and engage with their County government. These communications tools have been significantly beneficial to the County, informing the public about County programs, actions and opportunities. More than 500,000 people each month are seeing County social media content and tens of thousands of County residents each month are liking, sharing and commenting on those posts. This AP sets countywide standards for that content and encourages departments and staff to continue to use social media to inform and engage our constituents.

To implement this revised AP, the Communications Office will coordinate a series of meetings with all County social media account administrators to review the new procedures. Each administrator will be required to acknowledge in writing they received the new AP and were trained on the new moderation rules. In addition, any social media users who have been blocked from using County social media will have that restriction lifted so they will have an opportunity to participate in County social media under the new rules.

CHH/mjk

Attachment



ADMINISTRATIVE PROCEDURES

Procedure Number: _____ 3-31

Effective Date: _____ 04/06/2012

Revision Date: _____ 09/14/2017


County Administrator

SUBJECT: Pima County Social Media Procedure

DEPARTMENT RESPONSIBLE: All County Departments

I. PURPOSE

To address the way the public communicates with and obtains information about the County, Pima County departments may utilize social media to communicate with the public in support of County goals and objectives. This procedure defines the responsibilities of County participants and establishes rules for moderating the public discussion.

II. DEFINITIONS

Social Media: Digital technologies, platforms and online communities that allow publishing, communication and collaboration among individuals and institutions. Various forms of discussion and information-sharing tools exist, including social networks, blogs, video sharing, podcasts, wikis, message boards, and online forums. Examples of social media applications include Facebook, Reddit, Twitter and Instagram.

Branding: Visual guidelines reflecting the County's outward appearance with the primary goal of maintaining a consistent and recognizable appearance.

III. SOCIAL MEDIA GOVERNANCE

The Communications Office is responsible for oversight of all Pima County social media accounts, including the Pima County Public Library.

Departments must receive approval from the Communications Office prior to the creation of any social media account. Departments must provide the Office a specific communications plan for the use of the social media that includes communications goals, the targeted audience and the availability of staff to produce, post and monitor content. Social media accounts must adhere to the County's branding guidelines in accordance with this Administrative Procedure and with Administrative Procedures 3-14 and 3-15.

Responsibilities of the Communications Office

- Approve and set up department accounts
- Maintain administrative access to all accounts
- Establish standard naming conventions for social media platforms

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- Establish branding standards
 - Provide mandatory training to department staff regarding responsibilities for social media accounts.
 - Amplify presence and information through countywide accounts
 - Maintain social media inventory
 - Request and/or publish messages to all or select accounts
 - Be the sole purchaser of social media advertising or sponsored content except for Pima County Public Library accounts
 - Coordinate social media during an emergency
 - Gather statistical data regarding accounts
 - Develop guidelines for the capture and retention of social media records
 - Approve access to volunteers and interns
 - Establish Terms of Use and/or Community Guidelines for acceptable content on County social media and enforce the standards for content posted to County social media by County staff and the public
 - Establish and administer processes for the deletion of content violating the Terms of Use and/or Community Guidelines
 - Establish and administer processes for the blocking of habitual or egregious violators of the Terms of Use and/or Community Guidelines

Responsibilities of Departments

- Make requests via the Online Service Catalog and justify the use of a social media account.
- Designate at least two staff members to monitor accounts, including weekends/holidays, and provide timely responses, if necessary
- Ensure assigned staff attend the mandatory training provided by the Communications Office prior to accessing the social media account
- Ensure assigned staff read and adhere to the requirements of this Administrative Procedure
- Agree that only assigned staff who have attended social media training and are familiar with this Administrative Procedure will be permitted access to the department's social media accounts
- Conform to Communications Office social media standards and best practices, as established by the Office and taught in training

IV. ACCEPTABLE USE OF SOCIAL MEDIA

Social media, when put to their best use, create a public forum for the exchange of information. They should not be seen as a one-way road delivering information to the public. They also serve as a way for members of the public to communicate with their government and with one another. These media should be used in ways that appeal to the broadest possible audience and that are tolerant of multiple points of view and interests. Departments should bear in mind that social media is meant to be social and writing should suit the platform. The Communications Office will provide best practices and methods for using various types of social media in the mandatory training. Departments must ensure all content posted to social media is factual and accurate.

Examples of the types of communication to be distributed include the following:

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- Emergency information
 - Event and observance information
 - Customer service and feedback
 - Public service announcements
 - Employment
 - Public meetings
 - News, information and educational content
 - Community or neighborhood-specific information
 - Ways to communicate with elected and management officials
 - Marketing/promotional/awareness communications
 - Recognition of exceptional staff members

V. PROHIBITED CONTENT

Social media can sometimes be abused by people attempting to shock or prevent others from participating in a public forum or by those who fail to follow generally accepted standards of decorum when communicating in a public sphere. Therefore, the following forms of content shall not be allowed on Pima County social media:

By County Staff

- Comments in support of or opposition to political campaigns or ballot measures
- Criticism of County vendors, partners or contractors
- Profane or vulgar language or content
- Content that degrades others 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
- Threatening or harassing postings
- False information
- Personal attacks
- Sexual content or links to sexual content, except for instances of conveying information about public health
- Content that reveals private, personal information without permission
- Inappropriate photographs, including but not limited to, photographs involving the illegal use of alcohol or drugs, nudity, and scenes of graphic violence
- Conduct or encouragement of illegal activity
- Information that may tend to compromise the safety or security of the public or public systems
- Copyright, trademark, and intellectual property violations
- Solicitations for commerce or fundraising for outside organizations not coordinated, sponsored or organized by a County department

By the Public

- Profane or vulgar language or content
- Content that degrades others 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
- Threatening or harassing postings

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- Personal attacks against other public users of County social media
 - False information that causes harm to an individual or organization
 - Sexual content or links to sexual content
 - Content that reveals private, personal information without permission (doxing)
 - Inappropriate photographs, including but not limited to, photos involving the illegal use of alcohol or drugs, nudity, and scenes of graphic violence
 - Conduct or encouragement of illegal activity
 - Information that may tend to compromise the safety or security of the public or public systems
 - Copyright, trademark or intellectual property violations
 - Solicitations for commerce or fundraising

VI. **DELETING CONTENT AND BLOCKING USERS**

Content posted by County staff and the public on County social media is public record. County departments must adhere to State law and County rules and procedures for the maintenance and retention of public records (Administrative Procedures 4-4 and 4-5). See Section VII below. When content is perceived to violate the County's Terms of Service or Community Guidelines as established in Section V above, County social media administrators and/or editors must do the following:

Content deletion

- **Delete Immediately**
 - Profane or vulgar language or content;
 - Sexual content or links to sexual content
 - Inappropriate photographs, including but not limited to, photographs involving the illegal use of alcohol or drugs, nudity, and scenes of graphic violence;
 - Solicitations for commerce or fundraising

After deletion, the department must send notice of the deletion and the reason for deletion to the Communications Office.

- **Refer for Review by the Communications Office**
 - Content that degrades others 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
 - Threatening or harassing postings
 - Personal attacks against public users of County social media
 - False information that causes harm to an individual or organization
 - Content that reveals private, personal information without permission (doxing)
 - Conduct or encouragement of illegal activity
 - Information that may tend to compromise the safety or security of the public or public systems
 - Copyright, trademark or intellectual property violations

When departments believe content on their social media accounts violates one or more of these guidelines, they are to immediately notify the Communications Office and request it be deleted. The Public Communications Manager and the Social Media Editor will review the content and inform the department as soon as possible whether the content violates the guidelines and should be deleted. Separately, the Communications Office may contact

department social media editors or administrators and request deletion of content that violates the Terms of Service or Community Guidelines. If a department disagrees with the decision to delete content or allow content under question to remain, it may appeal that decision to the Deputy County Administrator responsible for the Communications Office. The Deputy County Administrator's decision will be final.

Members of the public who have their content removed must be informed that they may appeal the decision to the Deputy County Administrator.

Correction of posting or clerical errors need not be sent to the Communications Office.

County staff must report any threats of violence, harassment or information about illegal activity posted on County social media to the appropriate law enforcement agency.

Blocking Users

County social media are public forums and great care must be taken when preventing members of the public from participating in these forums. A single violation of the County's Terms of Use or Community Guidelines should not warrant blocking access to social media accounts (unless the violation is egregious, such as posting pornography or threatening harm or violence). Instead, the content should be deleted and users warned that continued violation of the Community Guidelines could result in the prevention of their ability to post content on County social media accounts. If a user persists in violating the Community Guidelines, department social media administrators may ask the Communications Office to consider blocking the user from using the particular medium. **Only the Communications Office may block a user from a social media account.** The Communications Office will maintain a database of all blocked users by account that will include the date they were placed on the blocked list, the reasons they were blocked, copies of the content violations, and copies of the warnings given to them. Blocked users may appeal the decision to the Deputy County Administrator responsible for the Communications Office. The Deputy County Administrator's decision will be final.

VII. SOCIAL MEDIA RECORDS

Content posted to any social media account is subject to the guidelines of the Pima County Records Program. The Communications Office, in collaboration with the Information Technology Department and the Clerk of the Board, will determine the appropriate method of capturing and maintaining social media records. Social media content, including a list of subscribers, is public record. Requests for these records shall be made in accordance with the provisions of Administrative Procedure 4-4.