



**CITY OF DUBLIN**  
**ADMINISTRATIVE ORDERS**  
**OF THE CITY MANAGER**

<b>ADMINISTRATIVE ORDER 1.27</b>
<b>TO:</b> All City of Dublin Employees
<b>FROM:</b> Megan O'Callaghan, City Manager <i>Megan O'Callaghan</i>
<b>SUBJECT:</b> Social Media Policy
<b>DATE:</b> September 1, 2024
<i>Supersedes and replaces Administrative Order 1.27, dated June 20, 2018 regarding same subject.</i>
<b>PROPONENT:</b> Division of Communications and Marketing

**1. PURPOSE**

A. The purpose of this Administrative Order is to establish a policy for the approved use of social media for official City use, by individual employees and as a limited public forum. This policy establishes and communicates reasonable standards designed to protect the City from unwarranted and unauthorized social media usage. This Policy provides a structure in which social media can effectively be used and prevent occurrences of abuse. Questions regarding this Administrative Order should be directed to the Division of Communications and Marketing (C&M).

B. The City endorses the secure use of social media to enhance communication, collaboration, and information exchange; streamline processes; and foster productivity. This policy establishes the City's position regarding the management, administration and oversight of applicable social media channels.

**2. APPLICABILITY**

A. For the purposes of this Policy, "social media" is any content created by individuals and shared on the internet, including social networks, online forums, blogs and podcasts. Examples of social media sites include, but are not limited to, Facebook, X (Twitter), Instagram, Threads, TikTok, LinkedIn, Flickr, Nextdoor, WeChat, Line, Vimeo, Reddit, Discord, YouTube, Pinterest and Yelp. "Content" includes text, articles, pictures, videos or any other form of communication posted.

B. This policy governs all City-maintained or owned social media sites, all content on City-maintained or owned social media sites and any conduct that violates this policy or any other City policy.

C. It is the responsibility of City staff to be aware of all aspects of this policy. Updates will be communicated through normal City communication methods.

D. The use of social media shall adhere to all applicable state, federal and local laws and regulations, including e-discovery laws, as well as all City policies, rules or Administrative Orders, including without limitation the City's policies against harassment and discrimination.

E. The State of Ohio public records laws and policies apply to City social media postings and content, therefore, content must be able to be managed, stored and retrieved to comply with these laws and the City's records retention policy. All official City-maintained and owned social media accounts should clearly indicate that any content posted is subject to public disclosure.

F. Employees found to be in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

G. It is the responsibility of all City associates to inform City officials of any inappropriate posts on City social media sites of which the associate is aware.

H. Nothing in this policy is intended to interfere with an employee or citizen's lawful rights.

### **3. POLICY**

A. Social media serves as a vast source of information and has quickly evolved into a powerful communication tool used by millions of people around the world. For this reason, it's in the City's best interest to utilize social media channels in disseminating information to the public regarding local government services, projects and events, as a supplement to traditional forms of public information including public meetings, newsletters, news releases and websites. Social media offers members of the public yet another, more instant opportunity to engage in dialogue with the City.

B. Inappropriate or unlawful use of social media, however, has the potential to adversely affect City objectives and missions.

### **4. OFFICIAL CITY USE**

A. The City utilizes social media channels for the dissemination of accurate information about services, projects, events and other public information.

B. The following goals have been identified for use of official social media accounts:

- (1) Be the public's trusted voice on issues pertaining to the City.
- (2) Educate the public about services and projects in the community.
- (3) Relay important safety messages and other urgent alerts as they occur.
- (4) Encourage citizen participation.
- (5) Monitor and respond to inquiries and comments in a responsive manner.
- (6) Engage in conversations with members of the public to enhance their understanding of City information.
- (7) Share pertinent information released by partner agencies and organizations.
- (8) Enhance relationships with the news media.

C. An official City social media account is defined as any social media account created or maintained by the City that represents the City as a whole, a City department or division, a City program or service, or a City event, using official City branding, images, websites or other content that could be perceived as representative of the City. This does not include social media accounts used to represent an individual's personal or professional persona, such as LinkedIn.

## **5. RESPONSIBILITIES**

A. The City's Division of C&M oversees all official social media accounts including but not limited to Facebook, X (Twitter), Instagram, LinkedIn, Nextdoor, WeChat, Line, Flickr, Vimeo and YouTube. The Division of C&M will have administrator privileges for all official City social media accounts and will maintain a secure database of usernames and passwords for all social media accounts.

B. The Division of C&M identifies and authorizes who within the City can publish content using official City social media accounts. Only the Division of C&M can approve and enter into a term of service agreement for new social media channels for official use.

C. When employees not authorized to publish content wish to use official City social media accounts to communicate messages, they will start the process with their Division C&M liaison. The C&M liaison will determine whether and how social media fits

into the City's overall approach to communications and marketing, and discuss appropriate messaging, timelines and individual responsibilities with the employee.

D. Only authorized users are permitted to comment publicly, post content or otherwise represent the City on any social media site or page. Employees not authorized to publish content for an official City social media account are prohibited from purporting to speak on behalf of the City unless specifically approved by the Division of C&M.

E. Where possible, social media sites or pages shall clearly indicate they are maintained by the Division of C&M with contact information prominently displayed.

F. Where possible, City-maintained or owned social media sites or pages should state that the opinions expressed by visitors to the page(s) do not necessarily reflect the opinions of the City, Department or Division.

G. City, Department or Division associates officially representing the City via social media outlets shall do the following:

(1) Conduct themselves at all times as representatives of the City and adhere to all City standards of conduct and observe conventionally accepted protocols and proper decorum.

(2) Identify themselves as a representative or associate of the City.

(3) Not conduct political or religious activities or private business.

(4) Relating to law enforcement matters, not make unauthorized statements about the guilt or innocence of any suspect or arrestee, or comments concerning pending prosecutions, nor post, transmit or otherwise disseminate confidential information, including photographs or videos related to City training, activities or work-related assignments without express written permission from the City Administrator or designees.

## **6. CONTENT MANAGEMENT**

A. Official City social media accounts provide a limited forum for members of the public to discuss issues relevant to the community. The City endeavors to promote democratic and civil discourse. Posts or comments that offer lawful criticism of the City or its Departments and its initiatives are welcome and will not be removed or altered except as provided for in this policy. The City reserves the right, however, to remove content submitted by users that fall in the following categories:

(1) Is libelous, defamatory, harassing, threatening or unlawful.

- (2) Violates another's copyright or intellectual property.
- (3) Condone or promotes illegal activity.
- (4) Is fraudulent or deceptive.
- (5) Solicitations of commerce, spam or other sites or advertisements.
- (6) Sexual content (explicit or implied) or links to sexual content.
- (7) Information that compromises the safety or security of the public or public systems.
- (8) Violates any local, state, federal and/or international laws or regulations.
- (9) Personally identifiable medical information.
- (10) Promotes particular for-profit services or products.
- (11) Information that harms the public welfare or encourages others to act unlawfully.

B. The City does not endorse opinions submitted by users and is not responsible for the accuracy of the claims, information, advice or comments posted by users.

C. The following disclaimer applies to all City-maintained or owned social media sites or pages and will be displayed on the site or page where possible:

*The purpose of this site is to provide a limited forum for matters of public interest in Dublin, Ohio. Users are encouraged to submit questions, comments, and concerns, but please note this is a moderated, limited forum and not a public forum. As such, the City of Dublin reserves the right to delete submissions/postings that contain:*

- (1) Libelous, defamatory, harassing, threatening or unlawful content.
- (2) Violates another's copyright or intellectual property.
- (3) Condone or promotes illegal activity.
- (4) Is fraudulent, deceptive, false or misleading.
- (5) Solicitations of commerce, spam or other sites or advertisements.

- (6) Sexual content (explicit or implied) or links to sexual content.
- (7) Information that compromises the safety or security of the public or public systems.
- (8) Violates any local, state, federal and/or international laws or regulations.
- (9) Personally identifiable medical information.
- (10) Promotes particular services or products.
- (11) Information that harms the public welfare.

The City of Dublin retains the right to remove posts or block individuals who violate these guidelines. The opinions and/or views expressed in the City of Dublin's social media sites represent the thoughts of individual followers and not those of the City of Dublin and its employees.

## **7. PUBLIC RECORD**

The State of Ohio public records laws and policies apply to most social media postings and content, and, therefore, content must be able to be managed, stored and retrieved to comply with these laws and the City's Public Record Policy, Administrative Order 1.18. All official City-maintained and owned social media accounts should indicate that any content posted is subject to public disclosure.

## **8. PERSONAL USE**

A. City employees should understand that social media has inherent limitations because of its internet foundation. It is not possible to ensure privacy, and the potential exists for any given post to be spread. Similarly, it is not possible to authenticate sources, and misappropriation of identity occurs regularly, with reckless, malicious or even criminal intent. Therefore, all information obtained from social media sources should be viewed skeptically. City employees should expect similar skepticism from the public, and, therefore, should use social media only as a supplemental method of information delivery. While this policy is not meant to infringe upon one's First Amendment rights, it is important to note that an employee enjoys no expectation of privacy to information posted into cyberspace even while off duty. Because of this, an employee needs to use "common-sense" when posting comments, photos, opinions or any other information related to his or her employment.

B. The City does not seek to control the purely personal content posted by employees when that content is posted during non-working time, is published using the

staff member's own equipment, is unrelated to and does not identify the employee's position with the City, and is not otherwise disruptive to City objectives.

C. Employees should be aware that their expressed comments and/or opinions may be interpreted as the City's, and thus, discretion should be used when submitting content on official City social media accounts as well as on personal accounts as it relates to the City.

D. Employees should limit personal use of social media while at work to the absolute minimum.

E. City employees are free to express themselves as private citizens on social media sites to the degree their speech does not impair working relationships in the City for which loyalty and confidentiality are important, impede the performance of their job duties, impair discipline and harmony among co-workers, or negatively affect the public perception of the City.

F. City employees are cautioned that speech on- or off-duty, made pursuant to their official duties (owing its existence to the associate's professional duties and responsibilities) is not protected speech under the First Amendment and may form the basis for discipline if deemed detrimental to the City.

G. Employees are encouraged to remember that not every employee chooses to share personal information online and associates should consider the privacy interests of their co-workers before discussing them online. In addition, law enforcement officers are specifically cautioned not to do the following:

(1) Ensure that any display of department logos, uniforms or similar identifying items on personal web or social media pages is consistent with all City policies and any General Order.

(2) Law enforcement officers who are, or who may reasonably be expected to work in undercover operations shall not post any form of visual or personal identification.

H. When using social media, City employees should be mindful that their speech becomes part of the worldwide electronic domain. Therefore, adherence to the City's Administrative Orders, policies and procedures, including but not limited to the City's policy against discrimination and harassment, is required in the personal use of social media.

I. Department personnel may not divulge information gained by reason of their authority; make any statements, speeches, appearances or endorsements; or publish

materials that could reasonably be considered to represent the views or positions of the City without express authorization.

## **9. GUIDELINES**

A. All City officials and employees using social media, whether on City, third party or personal sites, shall adhere to City ethical policies and appropriately maintain the levels of confidentiality with which they have been entrusted. They must respect copyright, medical and financial disclosure laws, and protect sensitive personal, security or operational information from release. They must not use any personal account for discussion of confidential City business or information.

B. Employees should avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage or defame employees or suppliers or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, sexual orientation or any other status protected by law or City policy. Inappropriate postings that may include discriminatory remarks, harassment and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may result in disciplinary action up to and including termination.

C. The City requests that if employees share official City messaging, that the full message, and hyperlink if applicable, is included.

D. Use of an employee's dublin.oh.us email address for creating personal accounts is prohibited. Employees are not authorized to speak or comment on behalf of the City using personal accounts and should indicate any opinions are their own.

E. Those with leadership responsibilities, by virtue of their positions, should consider whether personal thoughts they publish, even in personal venues, may be misunderstood as expressing City positions.

F. Every employee is personally responsible for any content they publish online, no matter the social media platform. Employees who identify themselves as being associated with the City including through photos containing department logos, uniforms or similar identifying items, should take personal responsibility that their online profile or any content posted on any platform is consistent with the standards of the City.

G. When discussing matters related to one's job or the City, employees should identify themselves by using their name and their respective role with the City. Employees should make clear that they are speaking as individuals and not on behalf of



the City. Due to the possibility of interfering with the City's mission, employees should exercise caution before commenting on social media in their official capacity.

H. Employees should not publish sensitive or confidential City-related information on their personal social media sites. Confidential information does not include information relating to the terms and conditions of employment. Employees are encouraged to remember that not every employee chooses to share personal information online, and employees should consider the privacy interests of their co-workers.

I. Departments may adopt additional guidelines for social media use that set out other restrictions beyond these standards, as needed.