

AGENDA ITEM: 6

MEETING DATE: May 27, 2015

TO: Board of Directors

FROM: Hardy Bullock, Director of Aviation and Community Services

SUBJECT: Social Media Policy

RECOMMENDATION:

Approve Policy (PI) #118 USE OF SOCIAL MEDIA BY THE DISTRICT.

Approve Policy (PI) #214 GUIDELINES FOR USE OF SOCIAL MEDIA BY DISTRICT OFFICIALS

DISCUSSION:

The Truckee Tahoe Airport District is developing a social media presence on Facebook. This is designed as a limited public forum with primary connections to our website. With help from social media subject matter experts and legal counsel, Staff has created two policies that govern the use of social media by the District (PI118) and by District Elected and Appointed Officials (PI214). See presentation for detail outlining the progression of work that developed the policies.

FISCAL IMPACT:

Considerable staff time to administrate, post, monitor, respond, and manage our social media messages.

PUBLIC COMMUNICATIONS:

Ancillary collateral in all channels will promote our social media rollout; print, web, radio, video, and newsprint along with e-blast, connected newsletters, and pilot outreach.

ATTACHMENTS:

- 1. Presentation
- 2. PI118
- 3. PI214

Social Media



May 27, 2015

The Plan

- ✓ Develop a social media presence for the District
- 1. Limited initially to Face Book only.
- 2. For the purposes of disseminating District information as a link to our website.
- 3. A LIMITED public forum.
- 4. Not designed to respond to negativity or constructed controversy rather to tell the story accurately in todays environment through todays medium.
- ✓ Develop Policy to Protect the District, its Staff members, Elected/ Appointed Officials
- SDRMA Webinar
- Social Media Experts [Brand Breadcrumbs / Media Leaders / Safe Smart Social]
- 3. Legal Counsel [Traci Park Burke Williams Sorensen LLP]
- 4. PR firm [Fresh Tracks]

Rollout

- ✓ Facebook page created by staff and Dave Sick with Brand Breadcrumbs.
- ✓ Monthly posting schedule and content will be reviewed by the oversight team: Hardy, Kevin, Marc, Seana, Dave, and Greyson.
- √ 3-4 posts weekly, prearranged and scheduled.
- ✓ Initially responses will be handled by the oversight team. Later staff will respond with as needed.
- ✓ Posting or response will not initially occur on weekends or holidays unless it is required by activity or directed by senior staff.
- ** The time required to administrate FB is in addition to routine, programed workload. Additional staff time and resources may be required to sustain the program**

SOCIAL MEDIA POLICIES FOR PUBLIC ENTITIES By Traci Park Burke, Williams & Sorensen LLP

Policy development team should include HR, IT, and Legal, with input from Departments as appropriate.

What are the proper social media pages for a public entity? Twitter, Facebook and LinkedIn are the three most appropriate for official use. YouTube, Instagram and others are redundant, as photos and videos can be posted elsewhere. Keep in mind, the more sites you have, the more time they will take to update, monitor and maintain, and having too many can actually dilute your content and message.

Key Issues to Consider Developing Social Policies Related to the Entity's Own Social Media Presence:

- 1. Since a social media policy is discretionary, the entire thing is subject to collective bargaining.
- 2. Review of the actual contract with each social media site. Be aware of any rights you may be giving up or other key terms of the user agreement. Links to the terms of service for Twitter, Facebook and LinkedIn are included at the end of this memo.
- 3. Include a definition section in your policy that explains key social media terms. Avoid broad sweeping statements in your policy that make unintended commitments. For example, you should not include a statement such as, "The City is committed to open dialogue and free speech for all of its employees, residents and constituents." As you can imagine, such a statement is a potential recipe for disaster! You would be better off with a more narrow policy statement, such as, "This site is intended to serve as a limited public forum."
- 4. It is important to regularly update and post on your account, and to regularly monitor for and remove content that violates your policy. (See tips below). Posting links, photos, videos, newsletters, and upcoming event information is a great way to keep the dialogue open and fresh.

With posting photos or videos: Do you need a release for everyone depicted? This may not be feasible if there is a group shot taken at a community event. Follow your own standard practice for using photos in marketing material. Also, keep in mind that users can post photos, links and other materials in their comments. Like public comments, those items will also need to be monitored.

5. Content posted by a public agency or any of its departments on a social media site likely will be considered a Public Record and must be stored, maintained and retained according to the PRA to the same extent as other public entity material covered by the PRA. The policy should include a statement like, "The City's social media sites

are subject to the PRA. Any content maintained in a social media format that is related to City business, including a list of subscribers, posted communication, and communication submitted for posting, may be a public record subject to disclosure."

- 6. Cross reference your social media policy with other policies, such as electronic communications, workplace harassment, overtime, workplace violence, code of conduct and employment reference policy. (For example, if your agency has a policy of not allowing current employees to serve as a reference for a departing employee, evaluate whether "Endorsing" another LinkedIn member violates that policy).
- 7. Determine whether your agency will maintain one master social media presence, or whether individual departments will have their own presence.

Allowing individual departments to have their own social media pages increases the level of work required and required number of employees in terms of posting, monitoring, maintaining, responding to and removing content. It also raises the potential for information to be posted that is inconsistent with agency rules or practices or information posted on the agency's own official web site. It also increases the risk of inadvertent breaches of secure information, the amount of data that will need to be retained under the PRA and your agency's own retention policy, and simply provides more forums that will need diligent oversight.

As an alternative, your agency can create one page, and then have various departments submit their materials to be posted. This will streamline the process, ensure consistency and compliance with the policy, and reduce the overall amount of work and oversight required.

8. Determine who will be responsible for maintaining the sites, including posting, monitoring and removing content. If each department is to have their own presence, likely someone from each department will be tasked with these duties. If there is to be one unified agency presence, then perhaps one or two people will need to be tasked with these duties. Consider whether posts by the designated employee will need to be reviewed by the Department Head or other responsible Manager.

If the person designated with these duties is a union employee, it may be considered a change in working conditions that requires union notification and bargaining. Consider realistically how much time the employee will need to dedicate to their new duties. If the employee is going to be required to spend two hours per day on these new duties, and their work is going to be distributed to others, the union may also want to bargain over the impact on those jobs.

As an alternative, try to use a non-union employee for these duties.

Also, be sure to update the employee's job description when these new duties are added!

If an employee does not want to take on the responsibility or does not have the time, you may have a management issue that will need to be carefully navigated. Talk to the employee and work with legal counsel.

- 9. All new social media sites should be specifically approved by the agency's top manager (i.e., City Manager), Department Head (if applicable) and the IT Department.
- 10. All sites should contain a link to the agency's webpage, which should remain the primary source of on-line information, a notice of same on the social media page.
- 11. Should you allow the public to comment or not?

If your agency's goal is the use social media exclusively to share your own information, then the public comment feature can be turned off. Although it is important to regularly post information to keep the site current, this approach requires the least amount of time and oversight. [NOTE: CURRENTLY, THE COMMENT FUNCTION ON FACEBOOK CANNOT BE TURNED OFF]

However, if your agency's goal is to establish an interactive on-line forum, then the public comment feature is the way to go. The benefit of allowing the public to comment is that it makes the site interactive and engages users. However, once this feature is turned on, you enter the nebulous zone of the First Amendment, and all those pesky posts and comments will need to be monitored and dealt with, per below. The drawback of the public comment feature, of course, is the posting of improper content by users and the need to remove it. With many comments, its like the Supreme Court says about obscenity: "I know it when I see it." But remember, as a public agency, you run afoul of the First Amendment if you remove content simply because you disagree with its viewpoint.

- 12. All sites should include a prominent statement about proper use and the agency's policy regarding removal of improper content, as well as a statement that the content is subject to the PRA. Consider a hyperlink to your actual policy. Removed content should be maintained pursuant to PRA guidelines, if applicable, and if not, for a set period of time consistent with your agency's retention practices. (Don't just use vague term, such as "for a reasonable period.").
 - -Terms of Proper Use to be included on each site: Any comment posted by a member of the public on any of the agency's social media sites is the opinion of the commentator only. Such comments do not imply the endorsement of, agreement with, or reflect the opinions or policies of the agency.

-Users agree to comply with all terms, rules, regulations and user terms of service imposed by the host of the site, and the agency will report any violations of the host site's rules to the host.

- -The agency reserves the right to deny access to any social media site for any individual who violates the host sites or agency's policy.
- -A statement that this is a limited public forum and a link to the agency's policy regarding prohibited content.
- 13. What content should be prohibited? Here is a non-exhaustive list of things to consider:
 - -Profane, obscene, violent, pornographic or threatening content
- -Content that promotes, fosters or perpetuates harassment or discrimination based on race, religion, gender, age, sexual orientation, or any other criteria protected by federal, state or local law.
- -Defamatory, derogatory or personal attacks on any agency employee or user of the site;
- -Solicitation of commerce, including any advertising of businesses or products for sale;
- -Content that includes any confidential, private, financial or personal information about any agency employee or user of the site, such as home addresses, phone numbers, social security numbers, etc.;
 - -Any content that violates or promotes violation of any federal, state or local law;
- -Any content that tends to compromise the safety or security of the public, public systems or the agency's technology resources;
- -Content that violates any legal ownership interests, such as trademarks or copyrights.
- 14. Who will be responsible for the decision to remove content from your social media sites?

The designated employee should bring questionable content to the attention of your agency's leadership, such as a department head, HR, City Manager and/or Legal. Removed content should be retained for a determined period of time consistent with your agency's other retention policies, and should include the time, date and identity of the poster.

15. Should the agency respond to public comments, or not?

The benefit of responding is that it makes the site interactive, allows the agency/Department to post responsive information or a link to the right department or

agency. But, the employee posting on behalf of the agency needs to be careful about being baited into on-line arguments, etc., and any information posted needs to be accurate and consistent with information on the agency's primary website. If there are any questions about whether or not to respond, seek guidance from your Agency Head, City Manager, HR, or department head.

16. What about "Liking" other social media pages, content or sharing hyperlinks?

It is appropriate to like other departments, civic organizations (i.e., LOCC, CSDA), charities with whom your agency is involved, state agencies, your County, etc. However, use extreme caution when endorsing any political party, campaign, or religious organizations or viewpoints.

- 17. The IT Department should have all log-in and password information, and if the employee in charge of maintaining the site leaves, the IT Department should be informed and the login and password changed immediately.
- 18. Include a statement that the policy is subject to revision at any time upon the approval of your agency's ranking manager (or whomever that duty is delegated to). You will need to give the union notice of proposed changes. We recommend reviewing the policy every 6 months, as the case law and technology are developing rapidly.
- 19. Employees governed by the policy should be given a copy and required to acknowledge it.
- 20. If you wish to include a provision stating that an employee who violates the policy may be subject to discipline, you will need to give notice to the union of your intent and give them a reasonable timeframe in which to respond and the date on which the agency intends to implement the policy. It is then up to union to come back and meet and confer over it. It is very important to document each of these steps!
- 21. Include a reservation of the right to monitor sites to ensure compliance with policy.
- 22. Include a statement such as, "The City's social media presence shall be maintained consistent with the Brown Act, the Political Reform Act and the California Election Code. Members of the City Council and City Commissions shall not respond to any published postings, or use the sire or any form of electronic communication to respond to, blog, or engage in serial meetings, or otherwise discuss, deliberate, or express opinions in any issue within the subject matter jurisdiction of the City or for any political purpose."
- 23. You will need to train your department heads, HR, IT people and all designated employees who will maintain the sites on the policy and the various issues raised by use of social media.

Be Sure to Read the Host Site's Rules, Since You Will Be Bound by Them and Incorporating Them into Your Own Terms of Use and Policy Language!

Twitter Terms of Service:

https://twitter.com/tos

The Twitter Rules:

https://support.twitter.com/articles/18311-the-twitter-rules#

Facebook Terms & Policies – Statement of Rights and Responsibilities; Data Use Policy; and Community Standards:

https://www.facebook.com/policies/

(Note: When you decide to use Facebook, you agree to resolve any claim, cause of action or dispute you have with Facebook exclusively in the U.S. District Court for the Northern District of California or a state court located in San Mateo County)

LinkedIn User Agreement:

https://www.linkedin.com/legal/user-agreement

You Should Check Out How Your Colleagues Are Using Social Media. Here Are A Few Of My Personal Favorites:

The **City and County of San Francisco** is a robust user of Facebook and Twitter, and my personal favorite example of a public entity who does not shy away from public discourse! Check out their 311 Service Request App.

https://www.facebook.com/SF

https://twitter.com/sfgov

The **City of West Hollywood** also does a great job of engaging with the community on social media:

https://www.facebook.com/wehocity

https://twitter.com/wehocity

The **City of Los Angeles** is a good example of what NOT to do. Its page started as a user-generated "Community Page," where the content was created by the general public, and Wikipedia is the source of information about the City. Note its lack of a newsfeed, useful information, links, or other relevant content. It's a shame our State's largest City is not taking advantage of the social media platform.

https://www.facebook.com/pages/Los-Angeles-California/110970792260960?rf=191151187584611

The **Cities of Anaheim** and **San Jose** have a decent Facebook pages, each with about 4,000 followers.

https://www.facebook.com/cityofanaheim?ref=search&v=wall

https://www.facebook.com/CityofSanJose?v=wall

For LinkedIn, I think that League of California Cities does an excellent job. There are about 1,360 followers and they regularly post updates, upcoming events, and articles.

https://www.linkedin.com/company/league-of-california-cities

TRUCKEE TAHOE AIRPORT DISTRICT POLICY INSTRUCTION

PI NUMBER: 118 Effective May 27, 2015

SUBJECT: USE OF SOCIAL MEDIA BY THE DISTRICT

PURPOSE: Establish guidelines on the use of social media sites by the Truckee Tahoe Airport District ("District") as an additional means of conveying District information to its constituents, residents, and visitors and maximizing the promotion of District services and facilities. This policy is also intended to mitigate associated risks from use of social media technology where possible.

DEFINITIONS:

"Social media sites" refers to websites designed to allow users to share and store information, photographs, and other user-generated content. Social media uses many technologies and platforms, including social networking, blogs, wikis, photo and video sharing, and more.

"District social media page" means a page on a social media site which the District establishes and maintains, and over which it has control over all postings, except for advertisements or hyperlinks by the social media site's owners, vendors or partners.

"Post" or "Comment" means information, articles, pictures, videos, hyperlinks or any other form of content or communication posted on any District social media page.

What does it mean to "Like" something? Clicking Like below a post on Facebook is an easy way to let people know that you enjoy it without leaving a comment. Just like a comment, the fact that you liked the post is visible below it. For example, if you click Like below a video: People who can see the video will be able to see that you liked it, a story will be posted on your Timeline that you liked your friend's video and the person who posted the video will get a notification that you liked it.

"Friend" means the Friends option in your audience selector lets you share things with your friends on Facebook. If anyone else is tagged in a post, it becomes Friends (+) because the audience expands to include the tagged person and their friends.

GENERAL POLICY:

The District's official website at www.truckeetahoeairport.com will remain the District's primary source and means of internet communication. To the extent possible, a link to the District's official website shall be included on any District social media page. Wherever possible, District social media pages

should link back to the official District website for forms, documents, online services and other information necessary to conduct business with the District. Information posted by the District on social media pages will supplement and not replace required notices and standard methods of communication. Not all forms of social media may be appropriate for use by the District and any social media page established on behalf of the District must be approved by the General Manager and/or the Director of Aviation and Community Services. Consideration shall be given to the overall nature, theme and suitability for use for District purposes. All approved social media sites must provide a mechanism for the District to remove posts or prevent the posting of content that violates this policy.

District social media pages should make clear that they are maintained by the District and state that they follow the District's social media policy. To the extent possible, this policy must be displayed to users or made available by hyperlink. The Comment and Response portion of this policy must appear in the "About" and/or "Page Information" and/or similar description area on any District social media page.

All photos posted by the District on its social media pages shall be for use in marketing and promotion of District programs and services. Under no circumstances will the District use photos of individuals who expressly ask that their photos not be made public.

District social media pages are subject to the California Public Records Act. Any content maintained in a social media format that is related to District business, including a list of subscribers, posted communication, and communication submitted for posting, may be a public record subject to public disclosure. All such content must be retained pursuant to the Public Records Act and the District's document retention policy.

Employees representing the District and posting content on behalf of the District on its social medial pages must conduct themselves at all times as a representative of the District and in accordance with all District policies. Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

This policy may be revised at any time upon approval by the Board of Directors. Every attempt will be made to provide prior notice of any changes. However, when deemed necessary in order to fully protect the District's interests, the interests of the public, and to more fully protect the safety of the public, including employees governed by this policy, then this policy may be changed without notice.

POLICY: SITE MANAGEMENT AND CONTENT

The exclusive social media site currently approved for official use by the District is Facebook. The District's official Facebook page must be created and maintained using an official District email account.

The District's IT staff, the District General Manager, and the Director of Aviation & Community Services shall maintain all login and password information.

The District's Facebook page is to be used for informational purposes and all content must pertain to the District and/or District business, programs, services or events. The District shall have full permission and rights to any content posted by or on behalf of the District, including all photographs and videos.

The District's Facebook page shall be managed consistent with the Brown Act, the Political Reform Act, and the California Election Code. Members of the District's board of directors, executive committee, or advisory committees shall not post or respond to any posts, comments or publications on the District's Facebook page, or use the District's Facebook page to blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the board of directors or executive committee(s), or for any political purpose.

The Director of Aviation & Community Services or their designee will be primarily responsible for posting content on the District's Facebook page on behalf of the District, monitoring content, responding to comments where appropriate, and ensuring adherence to this policy. Staff will review the District's social media pages on a daily/weekly/bi-weekly basis to ensure compliance with this policy. However, because the District's primary focus is on ensuring aircraft safety and providing aviation services, posting, monitoring and responding to comments on the District's Facebook page may be delayed under appropriate circumstances. In addition, the General Manager and/or the Director of Aviation and Community Services must be alerted immediately to any content posted on the District's Facebook page that violates this policy and/or the host site's terms and conditions of use.

No employee authorized to post content on the District's Facebook page shall express his or her own personal views or concerns. Rather, posting of content by any authorized employee shall only reflect the views of the District and shall be factual in nature.

Any employee authorized to post on the District's social media pages shall review, be familiar with, and comply with this policy and the social media host site's terms and conditions of use.

The District reserves the right to have any content restricted or removed if deemed to be in violation of this policy or any applicable federal, state or local law. Any such removed content must be retained consistent with the Public Records Act, where applicable, and/or the District's document retention policy, including the date, time and identify of the poster, when available, as well as a written statement of the reasons for removal of the content.

Pursuant to the District's Employee Social Media policy set forth in the Employee Handbook, the District does not condone the personal use of social media sites during the workday or by using District-owned equipment. Also, the District does not encourage the personal use of social media to follow or comment on the District's Facebook page. However, any employee who chooses to engage on the District's Facebook page is bound by the terms of this policy, as well as any other applicable policies, including but not limited to the District's Employee Social Media policy, the District's No Harassment policy, and the District's Acceptable Use of Electronic Communications policy. Employees are reminded and cautioned that information posted on a social media site is not private and may be used as evidence in administrative or legal proceedings. Any employee use of social media in a manner that violates District

policies or procedures will not be tolerated, and may be grounds for disciplinary action, up to and including immediate discharge.

While the District reserves the right to "Like" or "Follow" other government and civic organizations and similar entities, the District's Facebook page shall not be used to endorse any individual political candidates or viewpoints.

POLICY: COMMENT AND RESPONSE POLICY

Many social media sites permit and invite posts and comments by site users. By permitting use of this feature, the District does not intent to create a general public forum, and all comments and posts must comply with this policy. The District's Terms of Use, as set forth below, must be displayed on any District social media page or made available by hyperlink.

The District intends for its use of any social media to relate solely to matters of District business. A comment or post by a member of the public on any District social media page is the opinion of the commenter or poster only and does not imply endorsement of, agreement with, or reflect the opinions or policies of the District.

The following posts or comments are inappropriate and are subject to removal or restriction by the District:

- Profane, obscene, violent, or pornographic content and/or language;
- Content that promotes, fosters, or perpetuates discrimination or harassment on the basis of race, creed, color, age, religion, gender, national origin, sexual orientation or any other category protected by local, state or federal law;
- Defamatory, derogatory or personal attacks on any District employee or official, or comments that constitute bullying or abusive conduct toward District employees or officials;
- Content that adversely affects employee job performance, customers, vendors, suppliers, contractors working on behalf of the District or its legitimate business interests;
- Threats to any person or organization or encouragement of illegal activity;
- Information that tends to compromise the safety or security of District employees, the public, public systems or the District's technology resources;
- Content that violates any legal ownership interest, such as a copyright, trademark or trade secret;
- Content containing personal information such as home addresses, phone numbers, social security numbers, dates of birth or driver's license numbers;
- Solicitation of commerce, including any advertising or business services or products for sale;
- Content that violates any federal, state or local laws;
- Comments in support of, opposition to, any political campaigns or ballot measures;

- Comments not related to District posts, business, information, announcements, events or comments not related to the original topic, including random or unintelligible posts;
- Comments or posts on topics or issues not within the jurisdictional purview of the District.

The above list is not necessarily exhaustive and the District reserves the right to remove or restrict any post or comment that violates the purpose or spirit of this policy. Unacceptable content and repeat individual violators may be prohibited from making any further or additional posts on the District's Facebook page. The General Manager and/or the Director of Aviation and Community Services shall be consulted on any decisions with respect to the removal of content or prohibiting future use by repeat individual violators.

Any employee authorized to post on the District's social media pages shall use his or her best judgment in deciding whether or not to respond to a post or comment, and shall avoid engaging any user in an argumentative or offensive manner. Any response by an authorized employee made on behalf of the District shall comply with all terms of this policy. Content in any post or response made on behalf of the District shall not specifically refer to any District vendor, supplier, member, contractor, employee, or official without the approval of the General Manager and/or the Director of Aviation and Community Services.

John B. Jones Jr. - Board President

TRUCKEE TAHOE AIRPORT DISTRICT POLICY INSTRUCTION

PI NUMBER: 214 Effective May 27, 2015

SUBJECT: GUIDELINES FOR USE OF SOCIAL MEDIA BY DISTRICT OFFICIALS

PURPOSE: These guidelines pertain to the use of social media sites by elected or appointed officials serving the Truckee Tahoe Airport District ("the District"). The District recognizes that social media sites are a common and important platform for elected officials to engage with constituents and the community. However, personal social media pages and websites of elected and appointed officials can raise First Amendment and public records issues, and on-line discussions between such officials can potentially run afoul of the Brown Act, the California Elections Code, the Political Reform Act, and other federal, state and/or local laws. This policy is intended to mitigate against potential risks from the personal use of social media by its elected or appointed representatives.

DEFINITIONS:

"Social media sites" refers to websites designed to allow users to share and store information, photographs, and other user-generated content. Social media uses many technologies and platforms, including social networking, blogs, wikis, photo and video sharing, and more.

"District social media page" means a page on a social media site which the District establishes and maintains, and over which it has control over all postings, except for advertisements or hyperlinks by the social media site's owners, vendors or partners.

"Post" or "Comment" means information, articles, pictures, videos, hyperlinks or any other form of content or communication posted on any District social media page.

What does it mean to "Like" something? Clicking Like below a post on Facebook is an easy way to let people know that you enjoy it without leaving a comment. Just like a comment, the fact that you liked the post is visible below it. For example, if you click Like below a video: People who can see the video will be able to see that you liked it, a story will be posted on your Timeline that you liked your friend's video and the person who posted the video will get a notification that you liked it.

"Friend" means the Friends option in your audience selector lets you share things with your friends on Facebook. If anyone else is tagged in a post, it becomes Friends (+) because the audience expands to include the tagged person and their friends.

GENERAL POLICY:

Any elected or appointed official who chooses to utilize social media is bound by the terms of this policy, as well as any other applicable policies, including but not limited to the District's Employee Social Media policy, the District's Use of Social Media by the District policy, the District's No Harassment policy, and the District's Acceptable Use of Electronic Communications policy. Likewise, personal social media pages should be maintained and monitored consistent with the host site's terms of use.

Elected and appointed officials are reminded and cautioned that information posted on a social media site is not private and may be used as evidence in administrative or legal proceedings

Personal social media pages of elected and appointed officials shall be created and maintained using a personal email account, not an official District email address. Personal social media pages of elected and appointed officials should include a disclaimer that any content posted on that page is not an official record of the District, and that any views on the site are solely the views of the poster, and do not necessarily reflect the views of the District.

Elected and appointed officials shall not use personal social media pages to engage with each other online to discuss official District business. Because commenting on or "liking" posts of comments of other elected or appointed officials can implicate public records issues and/or potentially violate the Brown Act, such activity is discouraged by the District. Elected and appointed officials should not solicit online contacts or "friends" or followers on social media gained through duties as District officials.

Elected and appointed officials should not use personal social media sites to gain, post, or disseminate information about official District business, operations, policies or any other confidential information related to the District, including personal information concerning District employees.

Personal social media pages of elected and appointed officials should not contain hyperlinks to the District's official website or Facebook page. Likewise, documents or other content obtained through the elected or appointed official's position with the District shall not be posted on any personal social media page. Elected and appointed officials should not reference their personal social media pages at public District meetings or in any official District documents. Similarly, District-provided computers or mobile electronic communications devices should not be used to access personal social media pages.

Elected and appointed officials of the District are permitted to "Like" the District's Facebook page, but shall not post or respond to any posts, comments or publications on the District's Facebook page, or use the District's Facebook page to blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the board of directors or executive committee(s), or for any political purpose.