PURPOSE
This policy sets forth guidelines for the establishment and use by the City of Dubuque of social media sites as a means of conveying City of Dubuque information to the public. The intended purpose behind the use of City of Dubuque social media sites is to disseminate information from the City, about the City, to the public in a civil and unbiased manner.

The City of Dubuque has an overriding interest and expectation in deciding what is "spoken" on behalf of the City on City social media sites. For the purposes of this policy, social media means any facility for online publication and commentary, including without limitation blogs, wikis, content hosting sites such as YouTube, and social networking sites such as Facebook, Twitter, Instagram, LinkedIn, and Nextdoor. This policy is in addition to and complements any existing or future City of Dubuque policies regarding the use of technology, computers, smart phones, e-mail, and the internet.

POLICY
1. The establishment and use by any City department of City social media sites are subject to approval by the city manager or his/her designees. All City of Dubuque social media sites shall be administered by the department manager or his/her designees. Designees must provide the account login information (username and password) to the department manager and the public information officer. (The public information officer will be given administrator access to all City of Dubuque Facebook pages.) This policy shall also apply to social media sites/accounts for City projects facilitated by consultants and/or partner agencies.

2. The City of Dubuque's website (CityofDubuque.org) will remain the City's primary and predominant internet presence. The best, most appropriate City of Dubuque uses of social media tools fall generally into two categories:

   A) As channels for disseminating time-sensitive or emergency information as quickly as possible.
B) As educational or marketing/promotional channels to engage residents and stakeholders and to increase the City's ability to broadcast its messages to the widest possible audience.

3. City social media sites shall make clear that they are maintained by the City of Dubuque and that they follow the City of Dubuque Social Media Comments Policy. The City logo or branding shall be used on all social media accounts to confirm authenticity of the site. City social media accounts will only join a group or become a fan of a page if it is related to official City business, services, and events.

4. Wherever possible, City social media sites should link back to the official City of Dubuque website for forms, documents, online services, and other information necessary to conduct business with the City of Dubuque.

5. The department manager or his/her designees will monitor content on City social media sites to ensure adherence to both the City of Dubuque Social Media Comments Policy and the interest and goals of the City of Dubuque.

6. Users of all City social media shall adhere to applicable federal, state and local laws, regulations and policies.

7. The City reserves the right to restrict or remove any content that is deemed in violation of the City of Dubuque Social Media Comments Policy or any applicable law. Any content removed based on these guidelines must be retained by the department manager or his/her designees for a reasonable period of time, including the time, date and identity of the poster, when available.

8. Freedom of Information Act and e-discovery laws and policies apply to social media content and therefore content must be able to be managed, stored, and retrieved to comply with these laws using available tools.

9. City of Dubuque social media sites are subject to State of Iowa public records laws. Any content maintained in a social media format that is related to City business, including a list of subscribers and posted communication, is a public record. The department maintaining the site is responsible for responding completely and accurately to any public records request for public records on social media. Content related to City business shall be maintained in an accessible format pursuant to City policy and practice so that it can be produced in response to a request. Wherever possible, such sites shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure.

10. Employees representing the City of Dubuque via social media accounts must conduct themselves at all times as representative of the City of Dubuque. Acceptable behavior and online conduct are referenced and outlined in the Code of Ethical Conduct Statement for Employees, and guidance for city employee speech, including off-duty speech, and online activity conducted on personal social networks, and any additional applicable and relevant departmental policies and
procedures. Employees that fail to conduct themselves in an appropriate manner shall be subject to the disciplinary action procedures outlined in the Employee Handbook.

**City of Dubuque Social Media Comments Policy**
Although the City of Dubuque encourages posts and comments on the social media sites managed by the City, the sites are limited public forums and are moderated by City staff. The City reserves the right to deactivate the comment feature on City-affiliated social media sites, where applicable, at any time without prior notice.

1. A comment posted by a member of the public on any City of Dubuque social media site is the opinion of the commentator or poster only, and publication of a comment does not imply endorsement of, or agreement by, the City of Dubuque, nor do such comments necessarily reflect the opinions or policies of the City of Dubuque.

2. Comments containing any of the following inappropriate forms of content shall not be permitted on City of Dubuque social media sites and are subject to removal and/or restriction by the department manager or his/her designees after consultation with the City of Dubuque Public Information Office:
   a. Profane, vulgar, or obscene comments;
   b. Sexual content or links to sexual content;
   c. Comments not related to the original topic;
   d. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, sex, national origin, religion, familial status, age, sexual orientation, gender identity, marital status or mental or physical disability;
   e. Defamatory or personal attacks;
   f. Threats to any person or organization;
   g. Comments in support of, or in opposition to, any political campaigns or ballot measures;
   h. Solicitation of commerce, including but not limited to advertising of any business or product for sale;
   i. Conduct in violation of any federal, state or local law;
   j. Encouragement of illegal activity;
   k. Information that may tend to compromise the safety or security of the public or public systems; or
   l. Content that violates a legal ownership interest, such as a copyright, of any party.

3. Comments that contain the following information defined by the City as "protected" should be recorded/captured (i.e. screen shot) and be immediately removed. Protected information includes the following:
   a. Social security numbers
   b. Financial account numbers
   c. Dates of birth.
   d. Names of minor children.
   e. Individual taxpayer identification numbers.
   f. Personal identification numbers.
   g. Other unique identifying numbers.
4. The City of Dubuque reserves the right to deny access to City of Dubuque social media sites for any individual who violates the City of Dubuque Social Media Comments Policy, at any time and without prior notice. The City reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law.

5. The following verbiage can be used to warn individuals about their content: "Your recent post is in violation of the City of Dubuque Social Media Comments Policy. Please refrain from posting inappropriate content in the future. If you do not refrain from posting such content, we will block you from this forum. Thank you for understanding."

6. Departments shall monitor their social media sites daily for comments requesting responses from the City and for usage in violation of this policy. Responses, or acknowledgement of the request, should be provided within 24 hours.

7. Department managers or their designees, shall determine how employees must identify themselves when participating in the social media forum.

The social media comments policy must be displayed to users on the social media site or the site must contain information for users about where they may find the social media policy.

Michael C. Van Milligen
City Manager