

**CITY OF PIEDMONT**  
**Policy & Procedure**

**Policy No. 24**  
**Section: Administration**

**SUBJECT:** Social Media Content Moderation

**INTRODUCTION**

The City of Piedmont (“City”) maintains multiple social media platforms as a means to provide information regarding City business and community events. Accordingly, the City has an overriding interest in protecting the integrity, security, and accuracy of information posted on any official City social media account.

**PURPOSE**

This Social Media Content Moderation Policy (“Policy”) establishes general guidelines on the moderation of third-party content shared to City social media accounts.

Although Social Media provides an interactive platform, the City intends to create only a limited public forum subject to the restrictions set forth in this Policy.

**1. DEFINITIONS**

- A. “Social Media” refers to interactive online platforms which enable users to create and share content, and which may enable interaction between the City and the public. Examples of Social Media platforms include, but are not limited to: Twitter, Facebook, Nextdoor, Youtube, Instagram, and LinkedIn.
- B. “City Social Media Accounts” means Social Media sites, pages, mobile applications, services, or feeds established and maintained by the City.
- C. “City Social Media Lead” or “Social Media Lead” refers to those City Employees specifically authorized by the City Administrator, or their designee, to create content or to post or comment on a City Social Media Account on behalf of the City.
- D. “Post” or “Posts” or “Comment” or “Comments” means information, articles, pictures, videos or any other form of content or communication displayed on a City Social Media Account, including by members of the public.

**2. SOCIAL MEDIA ACCOUNTS**

- A. Each of the City’s Social Media Accounts is a limited public forum.
- B. City Social Media Accounts are to be used for informational purposes and all content shall pertain to or raise awareness of the City and/or City business, programs, services, interests, mission statement, purpose or events.
- C. Any content by the City or any content from third parties on a City Social Media Accounts, including, but not limited to Comments, Posts, private messages, chats, and

“likes” may be subject to the California Public Records Act. Any content maintained in a Social Media format that is related to City business, posted communication, communication submitted for posting, and removed content, may be a public record subject to public disclosure.

- D. The City reserves the right to have any content restricted or removed if deemed to be in violation of this Policy or any applicable law. Any such removed content will be retained consistent with applicable law.
- E. The City is not responsible for any content posted by third parties. A Comment or Post by a member of the public on any City Social Media Account 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 City.
- F. City Social Media Accounts may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. Additionally, requests for public records may not be made through the City’s Social Media Accounts.

### **3. COMMENTS**

All content on the City’s Social Media Accounts is subject to monitoring. Consistent with the purpose of the Limited Public Forum created by the City’s Social Media Accounts, the City reserves the right to moderate, monitor, remove, prohibit, restrict, block, suspend, terminate, delete, discontinue or reject comments and access to comments if they:

- 1. Do not relate or are not responsive to the original topic, including random or unintelligible comments, profane, obscene, violent, sexual, or pornographic content and/or language;
- 2. Promote, foster, or perpetuate discrimination on the basis of race, creed, color, age, religion, sex, gender, gender identity, gender expression, marital status, status with regard to public assistance, medical condition, military and veteran’s status, national origin, physical or mental disability, sexual orientation, or any other category protected by federal or state law, including association with individuals with these protected characteristics or perception that an individual has one or more of these protected characteristics;
- 3. Violate the legal ownership interest of any other party, including, but not limited to infringement of a copyright, trademark or any registered mark;
- 4. Threaten attacks on any person or organization or encourage violence or illegal activity;
- 5. Are “obscene” as defined in Chapter 7.5 (beginning with Section 311) of Title 9 of Part 1 the California Penal Code;
- 6. Use vulgar, offensive, threatening or harassing language;
- 7. Constitute or facilitate stalking or harassment;
- 8. Promote unlawful goods, services, behavior or activities;
- 9. Support/oppose or appear to support or oppose a ballot measure, initiative, or referendum, or any candidate for public office;

10. Contain an image or description of graphic violence;
11. Contain content that violates any federal, state or local laws;
12. Are spam or commercial promotions, including but not limited to unsolicited or unauthorized advertisement or solicitation;
13. May reasonably interfere with, inhibit, or compromise law enforcement investigations, police tactics, police responses to incidents and/or the safety of police staff and/or officer;
14. Are from automated sources or bots;
15. Are repetitive comments, where same or similar comments are posted multiple times on the City's Social Media Accounts;
16. Defamatory content and/or language;
17. Contain malicious software (malware) such as viruses, worms, trojans, rootkits, spyware, adware or any other unwanted software; or
18. May tend to compromise the safety or security of the public or public systems.

Initiated by: Communications Program Manager

Approved by: City Council

Date: July 17, 2023 (Resolution 49-2023)