

San Benito County Local Transportation Authority
Social Media Policy

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San Benito County Local Transportation Authority Social Media Policy

I. Purpose

The purpose of the San Benito County Local Transportation Authority (LTA) Social Media Policy is to provide all current and potential users and staff of its social media pages, tools, and applications information about its Social Media Policy.

II. Goal

The goal of these Policies is to ensure that social media is used responsibly to provide all its passengers with important information to have safe, reliable, convenient, and pleasant transportation to their destination in a timely manner.

III. On-Duty Staff Social Media Usage

The LTA expects that all on-duty staff will exercise personal responsibility whenever they participate in social media as a representative of the LTA. Staff should recognize that the proper use of social media is an important tool available to improve communication with the public. Staff shall also:

- Respect the privacy of others
- Carefully consider discussion of topics that might be objectionable or inflammatory
- Take all steps possible to check facts before content is published
- Acknowledge mistakes and make timely corrections to inaccurate information
- Not post proprietary information without obtaining consent from its partners or vendors
- Avoid responding to and making incendiary comments or posts
- Avoid subscribing to pages that promote, foster or perpetuate discrimination on the basis of race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, public assistance status or sexual orientation

1. Publishing Content

Authorized staff is responsible for creating and maintaining social media content. Social media should support, not replace, the information found on LTA websites. The critical content posted to social media sites should also be made available on the LTA website. Content posted to social media sites should contain links directing users back to the primary County websites for in-depth information, forms, related documents, or on-line services. In addition, content shall also:

- Comply with all applicable federal, state, and local laws, regulations, and policies.
- Use proper grammar, be correctly spelled and be easy to understand. Content should limit the use of jargon and acronyms.
- Conform to the LTA's Social Media Policy

Social media sites that allow users to comment on content shall have a clear statement of discussion topics so that users are aware of the limited nature of the discussion and that inappropriate posts are subject to removal. Categories of inappropriate posts, or comments, are provided in the User Comment Policy in Section V, Paragraph 1.

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2. Deleting or Updating Content

Authorized staff is responsible for maintaining and managing social media content. If LTA posted content is outdated, authorized staff may delete the content to avoid confusing users of the social media site. Such content that may be deleted or updated may include, but is not limited to:

- Limited service schedules
- Service maps and schedules
- Fare and policy information

3. Staff Usage and Monitoring

Authorized staff shall exercise its discretion on the usage and monitoring of social media. The Executive Director or his/her designee shall be responsible for approving the usage of social media and determining who is authorized to use social media on behalf of the agency or program.

Once approval is obtained from the Executive Director or his/her designee, staff shall create accounts and post content to social media that will conform to the LTA's Social Media Policy. The Executive Director or his/her designee shall be responsible for monitoring the content and usage of social media by staff.

Staff may only use LTA's social media accounts in official capacity during normal business hours or special work related events. However due to emergencies (i.e. natural disasters, evacuations, etc.), staff may use the LTA's social media accounts to help facilitate emergency responsiveness.

4. Social Media Accounts

Staff shall research social media platforms prior to seeking approval from the Executive Director or his/her designee. This includes reviewing exploring and understanding the social media platform's potential uses, features, privacy, limitations, ADA compliance, and terms and conditions. Terms and Conditions shall be reviewed by staff prior to registration.

Based upon this research, staff shall determine whether the social media platform will help achieve the goal of the LTA's Social Media Policy. If the social media platform meets the goal(s), staff will seek approval from the Executive Director. If the social media platform does not meet the goal, staff will discontinue the process of signing up for the account. This action does not prohibit staff to revisit the social media platform at a future date, if the new features are added to social media or if the goal(s) of the LTA's social media policy change.

After approval from the Executive Director or his/her designee, he/she shall identify one or more staff members authorized to make updates, changes, or closure of the social media account. Authorized staff shall provide login and passwords to the Executive Director or his/her designee. Login information for all social media accounts shall be filed and the information placed in a safe location. Changes may be made to login information if the social media updates login requirements change, when authorized staff changes, or if the account is compromised. Any changes shall be immediately updated to the social media account log.

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Whenever possible, the following account standards shall apply:

Standard Item	Standard Setting
Profile Image/Picture	Current County Express Logo, LTA Logo, marketing campaign specific or transit related images
Profile Information	Shall not contain, or display, gender, religion, views, relationship status, political influence, etc. Location San Benito County, California.
Notification Mode and Frequency	Via e-mail, most frequent setting
Types of Notification	User comments, tagging, posting of pictures, or videos
Advertising Setting	Highest level of allowed, preventing unsolicited advertisements
Privacy Setting	Public and searchable
Security Setting	Security Question Log-in notification from unknown computers Recognize device
Tracking Setting	If possible, do not allow tracking of the following: search terms, usage, and personal information.
Tags by Users	Approval and/or notification of authorized staff
Links	At a minimum, direct links to LTA services
Policies and Disclaimers	User Comment Policy Social Media Policy Disclaimer Image and/or Video Submission Terms and Conditions
URL	Customized to be easy to remember and searchable

5. Social Media Security

Access to social media shall be conducted during normal business hours or special work related events by authorized staff performing official LTA business. Staff shall make a diligent effort to install and update software on LTA computers and laptops for the most up-to-date software to protect against destructive technical incidents, including, but not limited to malware.

Accounts and password shall not be shared to 3rd party or non-LTA representatives. If the account appears to have been compromised, authorized staff shall be responsible for changing passwords immediately, updating login information, and notifying the Executive Director or his/her designee of the change. Authorized staff will look at all aspects of the account for unauthorized activities. Authorized staff will notify the Executive Director, or his/her designee, regarding the extent of the compromise and determine the appropriate course of action.

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6. User Monitoring

During the creation of social media accounts and updates to social media accounts, authorized staff shall assess the extent of user access. If the social media allows users to post comments and the decision is made to allow such activities, authorized staff shall monitor user comments. LTA's comment policy or a link to the policy shall be prominently displayed on pages that allow comments.

Authorized staff may respond to user comments in a professional, respectful manner and in compliance with the Social Media Policy.

Comments in violation of the User Comment Policy in Section V, Paragraph 1 shall be documented and deleted or not approved by authorized staff after conferring with their direct supervisor. Posts or comments determined to be spam will be documented and may be automatically deleted without conferring with direct supervisor.

7. Social Media Account Closure

Authorized staff will continually monitor its usage and responses from the general public and determine whether to account, privacy or security settings are appropriate. If any of the settings are found to be lacking and can potentially be detrimental to the LTA's Social Media Policy goal(s), authorized staff will notify the Executive Director and he/she, or his/her designee, shall decide whether the social media account should be deleted or temporarily disabled.

IV. Off-Duty Staff Social Media Usage

This section relates to the staff usage of their personal social media when they are off-duty. This section is not meant to be interpreted or enforced in any manner to discourage or penalize communications between staff concerning work conditions, terms and conditions or employment (e.g. wages or benefits), agency management, and/or agency.

1. Comment Policy

The following types of comments posted by staff on LTA's social media accounts are prohibited:

- Encouragement of hostility, violence, sabotage, discrimination or harassment at work, and/or towards other staff
- Comments or actions that violate state and federal law and/or that are prohibited by the San Benito County's anti-discrimination and/or anti-harassment policy
- Comments or images that are lewd, vulgar, obscene, incendiary, or threatening related to the general public, LTA, LTA services, staff, or Board of Directors

2. Personal Information

The following types of comments posted by staff are prohibited:

- Disclosure of confidential information (e.g. financial and medical information, social security numbers, etc.) related to LTA clients or staff
- Disclosure of LTA client names, personal information, or employment information

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3. Perceived Endorsement by Agency

Staff is prohibited from using the LTA's email address, domain, street address, or phone numbers, or in a manner in which it can be traced back to the LTA, to register for social media accounts intended for personal usage. Doing so may imply that staff is acting on behalf of the LTA and staff will be held fully responsible for any and all said activities.

This policy does not prohibit and will not be interpreted or enforced in a manner which could interfere with, restrain, or coerce employees from engaging in activities protected by the National Labor Relations Act, including concerted activities, discussion of wages, benefits, and other terms and conditions of employment.

Any staff member found to have violated this policy may be subject to disciplinary action.

V. **General Public Social Media Participation**

Members of the public are welcome to use and participate in LTA's social media activities. LTA shall strive to make content pertinent and easy to understand for its users. Where available, the LTA shall allow users to comment on content posted to social media. However, comments are subject to the User Comment policy in this Section. Users are advised to be responsible and respectful when utilizing LTA's social media website.

1. User Comment Policy

Users are welcome to post respectful comments on LTA's social media sites. User comments may not contain:

- Comments not topically related
- Profane language or content
- Comments that may be perceived as incendiary
- Promotion, fostering or perpetuation of discrimination on the basis of race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, public assistance status or sexual orientation
- Sexual content or links to sexual content
- Solicitations or links to commerce, such as, but not limited to, goods, services, or events
- Conduct or encouragement of illegal activity or political involvement
- Information that may tend to compromise the safety or security of the public or public systems
- Content that violates legal ownership or interest of any party

Comments that contain the abovementioned topics violate the User Comment Policy and are subject to removal by authorized staff. Authorized staff may confer with their direct supervisor and document the event prior to any removal.

The LTA shall post, or provide a link, to its User Comment Policy on social media sites that allow users to post comments.

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2. User Tagging Policy

Users may tag the LTA and its services in pictures and videos. Authorized staff has the right to remove, or request removal of, the tag if the content has as the following qualities:

- Comments not topically related
- Profane language or content
- Comments that may be perceived as incendiary
- Promotion, fostering or perpetuation of discrimination on the basis of race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, public assistance status or sexual orientation
- Sexual content or links to sexual content
- Solicitations or links to commerce, such as, but not limited to, goods, services, or events
- Conduct or encouragement of illegal activity or political involvement
- Information that may tend to compromise the safety or security of the public or public systems
- Content that violates legal ownership or interest of any party

3. Usage of User Content by LTA

Content provided by users may be subject to California's Public Records Act or may be required to be retained pursuant to the Government Code. Additional information regarding the recording of comments can be found under Records Management in Section VI.

User content may also be used by the LTA in the future as a part of marketing campaign(s), planning or funding activities. By posting content, the user is giving LTA permission to use their content, images, and their name/screen name for these activities.

4. Exceptions to User Comment and Tagging Policies

Under the following circumstances, the LTA may allow for comments and tags advertising goods, services, or events:

- LTA is a sponsor or contributor for an event, service, or activity, or
- Goods and services are offered by or events are held or sponsored by one of the LTA's non-profit or government partners.

If the user is not authorized to post such items, authorized staff will document and remove the post. To become one of LTA's partners, a non-profit organization or government agency must contact the LTA. The LTA will use its discretion in authorizing the non-profit organization or government agency to post goods, services or events on the LTA's social media account.

Comments or tags on LTA's social media account shall conform to the policies in Section V and the LTA's Advertising Policy.

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5. Usage of User-Submitted Photos and Videos by the LTA

User submitted photos and videos may be used by the LTA in the future as a part of marketing campaign(s), planning or funding activities. User reserves the right to request removal of images or content depicting the user, their children, or legal partner. By posting content, the user is giving LTA permission to use their content and their name/screen name for these activities. Additional information can be found in the Image and/or Video Submission Terms and Conditions in Section VIII, Paragraph 2.

6. Blocking and Banning of Users

The LTA welcomes comments from the public regarding its social media content and services. However, excessive violations of Section V are grounds for the LTA to block a user. Authorized staff shall confer with their direct supervisor and provide a record of excessive violations of the User Comment Policy. After discussing with the direct supervisor and receiving authority, authorized staff may block a user from its social media site.

Whenever reasonable, the blocked user will have the opportunity of re-participate in LTA's social media sites. Should the user resume excessive violations of the User Comment Policy, the user will become permanently banned from LTA's social media sites.

After conferring with their direct supervisor and providing a record of excessive violations of the User Comment Policy, authorized staff may permanently ban a user from its social media sites. Blocked/banned users will be documented by the LTA.

VI. Records Management

The LTA shall strive to document and maintain content and comments in an easily accessible format. Due to the nature of social media, there are limitations to the amount of information that is readily available to archive.

Content and information provided by the LTA and users may be subject to California's Public Records Act or be required to be retained pursuant to the Government Code.

VII. Social Media Advertisement

The LTA has the right to use social media platforms to advertise its services or promotions to its current clients and potential clients. Staff shall research the terms and conditions of placing the advertisement and receive approval from the Executive Director, or his/her designee, to proceed with the placement. Authorized staff will be responsible for placing the advertisement to the social media platform.

Advertisements for goods, services, or events by non-profit organizations or government agencies other than the LTA must be preapproved by the LTA. Such advertisements shall conform to the LTA's Advertising Policy.

VIII. Disclaimers

Where applicable, authorized staff shall display the following disclaimers on its social media sites:

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1. Social Media Disclaimer

Materials and information on this site are provided to share information on matters of public interest related to San Benito County Local Transportation Authority (LTA) services.

The LTA does not operate social media sites. Additionally, the LTA is subject to the terms of use for social media sites and does not control those terms. Accordingly, the LTA shall not be liable for any damages incurred due to errors, interruptions, inadequacies, or malicious computer code or components on social media sites, or its servers. The LTA does not warrant that all defects will be fixed. The materials contained on this site are provided “as-is,” and participants are under no obligation to use them.

The information contained on this site is intended to supplement, not replace, information provided through official LTA channels.

The LTA does not warrant the completeness, accuracy, or timeliness of material on this site. The information on this site is not intended to serve as legal or financial advice. The LTA disclaims all warranties, expressed or implied, for any of the materials provided on this site, including, but not limited to links to third parties, or any improper or incorrect use of them.

2. Image and/or Video Submission Terms and Conditions

Participants warrant that they are submitting images or videos that they have taken or that they have all rights to transmit and license and which do not violate trademark, copyright, privacy or any other rights of any other person or entity.

Participants grant the San Benito County Local Transportation Authority (LTA) (a) royalty-free, perpetual, non-exclusive, irrevocable, unrestricted, worldwide license to use, copy, print, display, reproduce, modify, publish, transmit and distribute the image and anything included in it with or without attribution; and (b) participants certify that any person pictured in the image (or, if a minor, their parent/guardian) authorizes LTA to use, copy, print, display, reproduce, modify, publish, transmit and distribute their likeness; and (c) participants agree to indemnify LTA and its employees, officers, directors and agents and hold them harmless from any and all claims and expenses, including attorney fees, arising from LTA's use of the image and/or participants failure to comply with these terms and conditions.

The laws of the State of California shall govern all rights and obligations under this Agreement, without giving effect to any principles of conflicts of laws.

This notice constitutes the complete Terms and Conditions and supersedes all prior oral or written understandings, communications, or agreements not specifically incorporated herein. LTA reserves the right to modify or revoke this agreement at any time.

IX. Definitions

Term	Definition
Authorized Staff	A member of LTA staff that has been identified by the Executive Director, or his/her designee, as a person who has the authority to make changes, updates, or deletion of a social media account

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Term	Definition
Ban	To fully disable a user's ability to access social media content by the account administrator. A user can be "unbanned" by the account administrator. Actual definition may vary from social media sites.
Block	To disable some, or all, of the user's ability to access social media content by the account administrator. A user can be "unblocked" by the account administrator. Actual definition may vary from social media sites.
Content	Refers to any media, text, and materials submitted, posted, or published to an online source that is accessible by the public. This definition includes, but is not limited to, photos or other images, videos, writings, documents, spoken statements, music, and audio.
Link	A reference to a webpage, website, document or content that the user can directly follow, or that is followed automatically.
Malware	May either be software, or a set of codes, that is designed to gain unauthorized access to computers or networks or loss of privacy and security. This definition includes computer viruses, worms, trojan horses, spyware, adware, and more.
On-Duty	Refers to the period of time when agency staff is officially working
Off-Duty	Refers to the period of time when agency staff is not working
Post	User submitted message that may include comments and/or one or more links to online information to websites, video, images, documents, applications, etc.
Pop-Up	A form of online advertising that can open a new web browser window to display advertising. The window may appear in front or behind the web page that the user is currently on. New forms of include a persistent toolbar that appears on a webpage that contains links to 3 rd party sites or advertisements designed to appear when a video or picture is showing.
Publish	The act of making content readily available to the public to an online site. This definition includes, but is not limited to, photos, documents, music, audio, video, etc.
Screen Name	A pseudonym that is used by the user that can differ from his/her real name. Also known as username or profile id.
Spam	Electronic messaging systems that sends unsolicited bulk messages indiscriminately. May take form in e-mails, text messages, content, advertising, etc. Typical spam messages may have links to other sites that are not directly related to the content. Some messages may include initial responses that appear to be on topic, but may include a link to a site that is not related to that topic.
Social Media	The U.S. Government defines social media as an umbrella term that defines the various activities that integrate technology, social interaction, and content creation. Through social media, individuals or collaborations of individuals can create web content, organize content, edit or comment on content, combine content, and share content. Social media uses many technologies and forms, including RSS and other syndicated web feeds, blogs, photo sharing, video sharing, podcast, virtual worlds, and more.
Tag	The act of linking a person, page, or place to something a user posts. Examples include the identification of person, place or thing in the post.

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Term	Definition
URL	A string of characters that makes up a link.
User	A person who is participating in, or utilizing, LTA's social media sites upon which the LTA is posting information. Social Media Platforms may have different names for users. Examples include, but not limited to, 'Friends,' 'Followers,' or 'Subscribers.'