




SECTION: HUMAN RESOURCES	REFERENCE NUMBER: A26
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FROM: CRYSTAL CALDERA, CITY MANAGER 	LAST REVISION DATE: 07/04/2016

Purpose

This policy sets forth the process for communication consistency within the City of Leon Valley (CoLV) organizational structure in order for staff to effectively and efficiently communicate with one another and the public. In addition, this policy establishes the framework with which staff will collect and disseminate information in a timely and proactive manner so that all citizens, as well as CoLV employees and City Council, remain knowledgeable on all information pertaining to the City. This policy is in addition to and applicable in relation to the City’s Personnel Policy manual for employees.

Scope

This internal communications policy applies to all employees of the City. This policy covers all internal communications resources, including meetings, branding, social media, newsletters, correspondence, reports and presentations.

Policy

The CoLV internal communications policy is to communicate clear, consistent messages to all employees and City Council members regarding the business and issues that affect the City of Leon Valley; and, to inform employees about the CoLV activities first, before being informed by external audiences. Internal communication should be open and appropriate – the right information delivered in the right way in the appropriate language for the target audience; and two-way – allowing for full involvement with feedback channels.

The City Manager, as the Chief Administrative Officer and City Spokesperson or his or her designee, will enforce the policy and ensure that it is implemented.

Procedures

It is the responsibility of the City Manager to ensure that information is disseminated to staff and City Council timely and appropriately.

- Ensure staff and City Council awareness of:
 - Vision and mission
 - Objectives
 - Structure
 - Policies and procedures
 - Alerts, risks or changes
- Maintain and monitor formalized methods of communication such as:
 - Staff meetings between the City Manager and department heads
 - Regular staff meetings within each department

- In-service training and induction
- Staff performance reviews
- Newsletters
- Direct email to staff
- Staff events
- Improve communication within and between departments, City management, and City Council
 - Regular updates to the City Council from the City Manager
 - Regular reports to the City Manager from department heads for use in City Manager's reports/updates to City Council
 - Updates on individual department bulletin boards for staff
 - A central source for information dissemination

Types of Information

In order for the internal communication plan to be effective, staff must have an understanding of what is confidential and may not be communicated.

The types of communication disseminated internally will cover a comprehensive range of topics. This will include appointment notices (new hires, promotions), retirements, organizational changes, success or news stories (awards, grants, etc.), new initiatives, status on capital construction, physical moves, technology breakdown, weather and safety alerts, and CoLV-sponsored events.

Negative situations such as crime (vandalism, theft, assaults, and deaths) or emergency service events such as fires, will be communicated factually and compassionately as soon information is available. Anything that impacts staff and CoLV operations should be communicated by the appropriate supervisors to their staff.

In the event of a death or violent crime the name of the victim or any identifiers are not to be released without the approval of the City Manager or their designee.

Weather alerts will originate with the CoLV Emergency Management Team and be disseminated according to the City of Leon Valley Emergency Management Plan.

Confidential Information

There may be circumstances when information should not be released internally (and externally) because such release may compromise individuals or the City of Leon Valley. This may include but not be limited to: personal and personnel issues, grievances, legal proceedings, discrimination issues, and non-factual or unproven information. In cases where the distinction may be unclear, the City Manager with consultations with the Mayor will make the final decision on what may be released, with advice from key personnel such as the Director of Communications, Fire Chief, Police Chief, Public Works Director and/or City Attorney. This policy does not supersede any statutory federal or state law requiring mandatory disclosure of information.

External

Media Relations Policy and Procedures

Overview

We have a responsibility to be open and responsive to information requests from the media because they are among the many ways our residents and business partners build individual perceptions of the City of Leon Valley.

Scope

This media policy applies to all employees of the City and is concurrent with the City's Disclosure Policy. This policy covers all external news media, including broadcast, electronic and print.

Policy

The City Spokesperson will convey the official position on issues of significance or situations that are particularly controversial or sensitive in nature. All requests for information will be properly handled in accordance with Government Code Title 5, Open Government §552.001. The statutory requirements that apply to governmental bodies that have received requests for public information can be found in the Public Information Act, which is codified at chapter 552 of the Government Code.

Among such responsibilities:

- Increase public awareness and understanding of the City, the services that we provide our community, and our future prospects for growth.
- Promote a positive public image of the City and the work we do to the audiences that are important to the City, which includes existing and prospective residents, employees and vendors, as well as government officials. The primary City Spokesperson is the City Manager (210-684-1391). In the City Manager's absence or discretion, the Mayor will serve in that capacity.
- The **CoLV Spokesperson** will provide general information in responses to CoLV inquiries. However, for matters that require more detailed information, Directors may be consulted to assist in formulating a response.

Guidelines for Talking with the Media

A reporter, producer or other news media may contact you for a number of reasons, for example:

- To get information about the City.
- To get information about a recent unexpected event such as natural disasters, thefts or arrests, accidents or injuries, customer or employee complaints, federal, state or local regulatory actions, etc.
- To get information or comment about an action or event that could impact our City, changes in government or City policies.
- To get general information on a topical story in our community such as changes in local government officials or policies, problems or issues specific to the community we serve, etc.

Refer all media calls to the City Spokesperson. Please do not say you are not allowed to talk to a reporter or have to get permission to do so. Instead, tell the reporter: "The City's policy is to refer all media inquiries to the City Spokesperson. You can reach them at 210-684-1391 Ext. 219."

Whenever taking a call from the media, the same courtesy and professionalism in which we approach customers should be displayed toward the media. In order to promote our customer service image, it is important to respond quickly, courteously and professionally to all media calls. Please remember to contact the City Manager if and when you have been approached by the media. Even though you have referred the media, the Spokesperson may need your help to prepare a response. **Do not let a reporter compel you to answer questions on the spot.** It is always beneficial to prepare in advance in order to provide accurate and relevant information.

Responses to Inquiries from the Media

1. Directors and staff will not respond to inquiries from the media concerning matters such as personnel issues, crisis management, emergencies, City policies and fiscal operations. Instead, such inquiries should

immediately be directed to the Spokesperson, who will respond accordingly. As the City Spokesperson, the decision to notify the Mayor and City Council will be the responsibility of the City Manager.

2. Directors and staff may respond directly to media inquiries on ordinary, day-to-day matters such as hours of operation or special events. However, all contacts should be reported immediately to the City Spokesperson.
3. Fire and Police Chief may respond to media at the scene of an incident as they deem necessary. They should notify the City Spokesperson as soon as possible about the incident and about their communication with the media.

The City Spokesperson will:

- Be informed promptly when any staff member of the City receives inquiries from the media
- Consult with the Mayor to prepare statements for the Mayor to release to the media
- Distribute all City news releases, review and approve those prepared by other members of the City and check with relevant personnel, Mayor, Council, Directors and/or designated contact person(s) to ensure news releases are accurate and consistent
- Keep the Mayor, Council and Directors informed of all relevant media situations and inquiries by direct communication

The City Manager will designate a Department to:

- Retain and file copies of all news releases
- Ensure copies of all CoLV news releases are distributed for posting on the City's website and Social Media Platforms

Emergency Response Statement

In the event of an emergency, the City Spokesperson will work with members of the Emergency Operations Staff (see City of Leon Valley Emergency Operations Plan) to gather information and coordinate distribution to the Mayor, City Council, staff, and the local community.

- Prepare and issue official statements regarding City operations to the media
- Compose and distribute email notifications to the City Staff
- Work with the Communications Director or designee to provide emergency updates on the CoLV web page and social media accounts (Facebook, Twitter, etc.)

Following initial notifications of an emergency, the City Spokesperson will prepare update notifications as needed.

City Sponsored Social Media Policy

Social media provides a new and potentially valuable means of assisting the CoLV and its personnel in meeting community outreach, problem-solving, investigative, crime prevention, and related objectives. Because the improper use of social media platforms by employees may impact department operations, the department provides information of a precautionary nature as well as prohibitions on the use of social media by department personnel. These policies and procedures apply to all personnel, including sworn and non-sworn employees and any volunteers working with the CoLV.

Purpose

This policy establishes guidance on the management, administration and oversight of social media. This policy is not meant to address one particular form of social media; rather social media in general, as advances in technology, will occur and new tools will emerge.

Requirements for Department-Sponsored Public Social Media Sites

- Each department shall designate person(s) who are responsible for the management, posting, and monitoring of the CoLV's public social media network sites. Other members of the department may post and monitor specific social media sites as approved by each department Director.
 - The City Manager, with input from department Directors, will determine the extent of the City's official use of social media platforms. No social media platform will be utilized without the express approval of the City Manager.
 - Where possible, the page(s) should link to the CoLV's official website.
 - Social media pages shall clearly indicate they are maintained by the CoLV department or CoLV and shall have contact information prominently displayed. Social media content shall adhere to applicable laws, regulations, and policies, including all information technology and records management policies.
 - Content is subject to open government laws. Relevant records retention schedules apply to social media content. Content must be managed, stored, and retrieved to comply with open government laws, records retention laws, and e-discovery laws and policies.
 - Pages shall clearly indicate that any content posted or submitted for posting is subject to public disclosure.
 - Social media pages should state that the opinions expressed by visitors to the page(s) may not reflect the opinions of the department or the CoLV.
 - The City of Leon Valley may hide comments posted on City social media accounts if the comment meets one of the following conditions:
 - Comments that suggest or encourage threats of violence or illegal activity are not allowed,
 - Inciting language,
 - Factual statements that are known to be false, and
 - Solicitations and advertisements are not allowed.
 - The above conditions shall be clearly posted on Social Media sites.

Operation of Department-Sponsored Public Social Media Sites

- CoLV personnel, approved by the City Manager, to post to social media outlets shall do the following:
 - Conduct themselves at all times as representatives of the CoLV and, accordingly, shall adhere to all CoLV standards of conduct and observe conventionally accepted protocols and proper decorum.
 - Identify themselves as a member of the CoLV.
 - Not make 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 department training, activities, or work-related assignments without express written permission of the CoLV Manager.
 - Not conduct political activities or private business.
 - CoLV personnel use of personally-owned devices to manage the department's social media activities or in the course of official duties is prohibited without express written permission of the City Manager.
 - Employees shall observe and abide by all copyright, trademark, and service mark restrictions in posting materials to electronic media.

Use of Covert Social Media Sites for Investigative Operations

- Covert or undercover social media sites are exempt from the requirements of sections 1, 2, and 3 above.

- Only the Chief of Police may approve the use of any covert or undercover social media site or postings to other social media sites for undercover investigative operations. A Supervisor may be assigned to monitor the operation of the investigation.
- Prior to operating any covert or investigative social media site, or posting to other social media sites for purposes of a covert or undercover investigation, the supervisor shall make contact with the prosecuting attorney to determine the admissibility and requirements of the law regarding the preservation of information for both prosecution and open government and records retention requirements.

Personal Use of Social Media

Precautions and Prohibitions

- Barring state law, department personnel shall abide by the following when using social media:
 - CoLV employees may not access social networking or social media sites through the use of City provided information systems--unless authorized to do so or during the course of an investigation.
 - While on duty, employees may only use personal communications devices to access social networking sites **strictly during authorized breaks**, provided such usage does not in any way interfere with the performance of job duties. Employees are prohibited from authoring posts on a social networking site at any time while on-duty.
 - Due to concerns for employee safety and to preserve tactical advantage, the posting of information related to any police response by any employee or assisting agency is absolutely prohibited without the approval of the City Manager.
 - All matters of, by, within, and about department details regarding calls for emergency service and the customers we interact with are generally considered confidential information which may not be released, blogged about, posted, or otherwise shared outside the City without prior authorization, without it having been obtained through an official open records request, or without the information already being in the public realm [already otherwise released officially].
 - Inappropriate display of the CoLV logos, uniforms, uniform patches, or departmental badges on their own or other's social media sites is prohibited. Use of these items for personal use must be with the written approval of the department Directors or City Manager.
 - As public employees, City personnel are cautioned that speech on or off-duty, made pursuant to their official duties-- that is, that owes its existence to the employee's professional duties and responsibilities— may not be protected speech under the First Amendment and may form the basis for discipline if deemed detrimental to the department.
 - City personnel should assume that their speech and related activity on social media sites will reflect upon their office and the CoLV.
 - For safety and security reasons, CoLV personnel are cautioned not to disclose their employment with this CoLV nor shall they post information pertaining to any other member of the CoLV without their permission.
 - Employees are encouraged not to post any information that could be used to identify the employee's residence, vehicle or family members.
 - Employees must follow all copyright laws, public record laws, retention laws, fair use, financial disclosure laws and any other laws that might apply to the City or your functional area.
 - When participating in social networking sites not related to City business, an employee shall: be mindful that their speech becomes part of the worldwide electronic domain.
 - Employees are required to be credible witnesses in criminal prosecutions and that credibility can be attacked using inappropriate posts on social media sites.
 - Employees shall adhere to the following guidelines when using personal social media:
 - Employees shall not use obscene or sexually explicit language, images, or acts and statements or other forms of speech that ridicule, malign, disparage, or otherwise express bias against any race, any religion, or any protected class of individuals. Avoid comments or topics that may be considered objectionable, disruptive or inflammatory.

- Using someone else's name, likeness, or other personal attributes without that person's permission for an exploitative purpose; or publishing the creative work of another, trademarks, or certain confidential business information without the permission of the owner.
- CoLV employees should be aware that privacy settings and social media sites are constantly in flux, and they should never assume that personal information posted on such sites is protected.
- Activities which are considered disruptive include, but are not limited to, harassing, demeaning, or creating a hostile working environment for any official or employee; Sending, receiving, or accessing pornographic materials, disrupting the smooth and orderly flow of work within the City; or disrupting working relationships. In addition, employees are subject to discipline for inappropriate activities, on or off duty.
- **CoLV personnel are reminded that the City policies and Code of Conduct apply to on-line activities. There should be no expectation of privacy for items or activities conducted on-line.**

Monitoring of Social Media and Discipline

- Supervisors within the department may make random investigations into the postings of employees for purposes of protecting the integrity and reputation of the CoLV, protecting the integrity of investigations, and ensuring privacy and security of city records and information.
- Any employee becoming aware of or having knowledge of a posting or of any website or web page in violation of the provision of this policy shall notify his or her supervisor immediately for follow-up action.
- Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.