

HOUSING AUTHORITY OF THE CITY OF LOS ANGELES SOCIAL MEDIA POLICY

I. Purpose

- A. This Social Media Policy (“Policy”) establishes guidelines for the Housing Authority of the City of Los Angeles’ (the “Authority’s”) use of social media sites as a means of disseminating information about the Authority’s mission, business meetings, activities, and current events.

II. Definitions

- A. “Social media sites” means content created by individuals, using accessible, expandable, and upgradable publishing technologies, through and on the Internet. Current examples of social media sites include, but are not limited to, Facebook, Twitter, Instagram, Blogs, RSS, YouTube, LinkedIn, and Flickr.
- B. “Authority’s social media sites” means social media sites which the Authority establishes and maintains, except for advertisements or hyperlinks by the social media sites’ owners, vendors, or partners. This does not include non-official social media sites that post content that relate or refer to the Authority. The Authority’s social media sites shall supplement, and not replace, the Authority’s standard methods of communication.
- C. “Posts” or “postings” means information, articles, pictures, videos or any other form of communication posted by the Authority on the Authority’s social media sites.

III. General Policy

- A. The Authority’s official website at www.hacla.org (or any domain owned by the Authority) is the Authority’s primary means of internet communication.
- B. The establishment of the Authority’s social media sites is subject to approval by the Authority’s President & CEO (hereinafter “President”) or his/her designee (the “Communications Designee”). Upon approval, the Authority’s social media sites shall bear the name and/or official logo of the Authority. Approved social media sites may change over time as the needs of the Authority and available platforms evolve.
- C. Where possible, the Authority’s social media sites shall clearly state that such sites are maintained by the Authority and that the sites comply with this Policy.

- D. The Authority's President or his or her communications designee shall monitor content on the Authority's social media sites to ensure adherence to this Policy and the interest and goals of the Authority.
- E. The Authority's social media sites shall be managed in compliance with the Ralph M. Brown Act ("Brown Act"). Members of the Board of Commissioners shall not respond to, "like", "share", retweet or otherwise participate in any published postings, or use the Authority's Social Media Sites or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, develop a collective concurrence or express opinions on any issue within the subject matter jurisdiction of the body.
- F. The Authority reserves the right to terminate any of the Authority's social media sites at any time without notice.
- G. The Authority's social media sites shall comply with usage rules and regulations required by the site provider, including privacy policies. However, such use shall not conflict with the Authority's internal policies.
- H. Where possible, this Policy shall be displayed to users of the Authority's social media sites or made available by hyperlink. Moreover, this Policy shall be made available on the Authority's website.
- I. The Authority's usage of social media sites shall adhere to applicable federal, state and local laws, regulations and policies.
- J. The Authority's social media sites are subject to the California Public Records Act (*Gov't. Code § 6254 et seq.*) Any content maintained on the Authority's social media sites in the ordinary course of its business, including a list of subscribers, posted communication, and communication submitted for posting, may be considered a public record and subject to public disclosure.
- K. Employees representing the Authority on the Authority's social media sites shall conduct themselves at all times as professional representatives of the Authority and in accordance with all Authority policies.
- L. The Authority's social media sites shall utilize authorized Authority contact information for account set-up, monitoring and access. The use of personal email accounts or phone numbers by any Authority employee is not allowed for the

purpose of setting-up, monitoring, or accessing the Authority's social media sites for official Authority purposes.

- M. The Authority's social media sites may contain content, including but not limited to, advertisements or hyperlinks over which the Authority has no control. The Authority will not endorse any hyperlink or advertisement placed on the Authority's social media sites by the social media site's owners, vendors, or partners.

IV. Content Guidelines

- A. The content of the Authority's social media sites should pertain to Authority-sponsored or Authority-endorsed programs, services, and events. Content includes, but is not limited to, information, photographs, videos, and hyperlinks. Where appropriate, the Authority may include content related to programming, services and opportunities provided by other public agencies.
- B. Where appropriate, content posted to the Authority's social media sites should contain hyperlinks directing users back to the Authority's official website for in-depth information, forms, documents or online services necessary to conduct business with the Authority.
- C. Original works created by the Authority and posted to the Authority's social media sites are the intellectual property of the Authority. Where the Authority does not own the intellectual property rights of certain material, use of such material must comply with all applicable state, federal and local laws.
- D. Any employee authorized to post items on the Authority's social media sites shall review, be familiar with, and comply with the social media site's use policies, terms and conditions.
- E. Postings on the Authority's social media sites by an authorized Authority employee shall only reflect the views of the Authority. Any employee authorized to post items on the Authority's social media sites using the Authority's social media account shall not express his or her own personal views or concerns through such postings.
- F. Postings by the Authority must contain information that is freely available to the public and not be confidential as defined by any Authority policy or state or federal law.
- G. Except for the names of employees whose job duties include being available for contact by the public, consent must be obtained from an individual (or, where

applicable, that individual's legal representative or guardian) prior to posting content that includes that individual's personal information.

- H. The Authority reserves the right to implement or remove any functionality of its social media sites. This includes, but is not limited to, information, articles, pictures, videos or any other form of communication that is posted on the Authority's social media site.
- I. Except as expressly provided in this Policy, accessing any social media sites using the Authority's social media accounts shall comply with all applicable Authority policies, including, but not limited to, the Information Technology Policy.
- J. All of the content on the Authority's social media sites are subject to oversight by the President or Communications Designee.

V. Comment Guidelines

- A. Users of the Authority's social media sites are bound by each site's terms of service. When possible, users leaving the Authority's website by a link to the Authority's social media sites will receive a disclaimer substantially similar to the following:

You are about to leave the Housing Authority of the City of Los Angeles' ("HACLA") website. Materials and information on the linked site are provided to share information on matters of public interest related to HACLA. HACLA does not operate this linked site. Additionally, HACLA is subject to the terms of use for this linked site and does not control those terms. Accordingly, HACLA shall not be liable for any damages incurred due to errors, interruptions, inadequacies, or malicious computer code or components on the linked site or its servers. HACLA does not warrant that all defects will be fixed. The materials contained on the linked site are provided "as is" and you are under no obligation to use them. The information contained on the linked site is intended to supplement, not replace, information provided through official HACLA channels, such as the HACLA website and links contained therein. HACLA does not warrant the completeness, accuracy or timeliness of material on the linked site. The information in the linked site is not intended to serve as legal or financial advice. HACLA disclaims all warranties, expressed or implied, for any of the materials provided on the linked site, including but not limited to links to third parties, or any improper or incorrect use of them.

- B. Some social media sites allow user comments. It is the responsibility of the President or the Communications Designee to determine whether to allow comments on the Authority's social media sites. Where permitted, comments should not be deleted except to the extent it violates this Policy, including but not limited to section V.C., below.
- C. Comments made on the Authority's social media sites shall NOT contain any of the following:
- i. Comments that are not topically related to the particular posting being commented upon;
 - ii. Comments in support of, or opposition to, political campaigns, candidates or ballot measures;
 - iii. Profane or threatening language or content;
 - iv. Content that promotes, fosters, or perpetuates discrimination on the basis of race, color, religious creed, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, citizenship, age, marital status, physical disability, mental disability, medical condition, genetic characteristic or information, military and veteran status, political activities or affiliations, status as a victim of domestic violence, assault or stalking, as well as any other category protected by federal, state, or local laws;
 - v. Sexual content or links to sexual content;
 - vi. Solicitations of commerce;
 - vii. Conduct or encouragement of illegal activity;
 - viii. Information that may tend to compromise the safety or security of the public or public systems;
 - ix. Content that violates a legal ownership interest of any other party, including the unlawful disclosure of confidential or proprietary information; or

- x. Content that violates the Authority's policies.
- D. Any content removed based on these guidelines must be retained, including the time, date and identity of the poster, when available. The time period for retention of content that has been removed shall be governed by the Authority's Record Retention and Disposition Policy for Administrative Records.
- E. Nothing in this Policy shall be applied to prohibit or infringe upon any communication, speech, or expression that is protected or privileged under law. This includes speech and expression protected under state or federal constitutions as well as labor laws or other applicable laws.
- F. **Comments made on the Authority's social media sites does not constitute giving official notice to the Authority for legal, business or any other purpose or demand.**
- G. The Authority's social media sites are not intended to serve as a forum for members of the public to inquire about general Authority business or submit service requests. For service requests, residents must contact the work order center or other designated department. For general comments or questions concerning the Authority, members of the public should contact the appropriate authority representative. A directory is available on the Authority's website at www.hacla.org/contactus.
- H. The President or the Communications Designee shall determine, on a case-by-case basis, whether the Authority should respond to comments made by members of the public on the Authority's social media sites. Such determination shall be made in accordance with the Brown Act, Authority's procedures, best practices, and the Authority's business needs.

VI. Security

- A. The Authority's social media sites shall be password protected. A log file containing the name of the social media site, account identification/login information, password, registered email address, date established and the individual who authorized the account shall be maintained by the President or Communications Designee and shared with the Director of Information Technology.

- B. Passwords to the Authority's social media sites must be changed every ninety (90) days and immediately after the password or social media site(s) accessed using the password has been, or is suspected of being, compromised. The passwords must also be changed immediately if an authorized user is removed as an administrator or leaves the Authority's employment.
- C. In order to prevent unauthorized access to the Authority's social media sites when a computer or device has been compromised or stolen, authorized users are not permitted to use automated login options on the Authority's social media sites.
- D. If any of the Authority's social media sites have been, or are suspected of being, compromised, the Authority's Information Technology Officer should be notified immediately.

VII. Violations of the Social Media Policy and Procedures

- A. A violation of this Policy or the corresponding Procedures may be grounds for disciplinary action up to and including termination. All such disciplinary action shall be subject to any provisions in the applicable memorandum of understanding, if any, and/or the Authority's Personnel Rules.

VIII. Procedures

- A. The President shall provide for the development, administration and implementation of the procedures to be adopted in furtherance of this Policy ("Procedures").

IX. Amendments to the Policy

- A. This Policy may only be amended by the Board of Commissioners. The Procedures adopted to implement this Policy may be amended at any time at the discretion of the President, without the approval of the Board of Commissioners.