

San Mateo County Departmental Social Media Policy (revised July 2025)

San Mateo County Social Media Policy

Overview

In order to reach a broader audience, streamline processes, enhance communication, collaboration and information exchange, and foster productivity improvements, County of San Mateo departments may use social media technology as a medium to further the goals of the County and the missions of its departments where appropriate.

Policy Purpose

The purpose of this policy is to establish County-wide standards for and responsibilities regarding the use of social media. This policy will ensure that the County Communications staff use of social media tools are compliant with existing policies and legal requirements.

Scope

This policy is applicable to all County Workforce Members, departments who use social media technology, and County Boards and Commissions. The use of social media for official County purposes also requires adherence to the guidelines and requirements as set forth by the [Social Media Handbook](#).

Policy

Each official San Mateo County presence on social media sites or services is considered an extension of the County's information networks. Accordingly, official County social media use must comply with all applicable County policies, including those governing email, Internet usage, portable computer use, and information security. County social media activity shall also adhere to applicable state and federal regulations, statutes, and laws, including those addressing copyright and records retention, as well as Constitutional First Amendment protections, the California Public Records Act (CPRA), Health Insurance Portability and Accountability Act (HIPAA), and other applicable privacy laws.

Only authorized Workforce Members designated by their department head will be permitted to conduct official County business using social media sites and tools. "Workforce Members" are all County employees, including extra help, part time, and temporary positions, and liaisons for Boards and Commissions. All Workforce Members must conduct themselves at all times in accordance with this Social Media Policy and the Social Media Handbook, including with respect to their personal use of social media.

I. Departmental Use

A. *Departmental Social Media Account Guidelines*

1. Each department has the authority to establish and terminate social media use and to set goals, policies, and practices for its use. Each department head shall designate at least one departmental Social Media Manager who will have the authority to use social media on behalf of the department and is responsible for ensuring the appropriateness of the content and policy compliance. The Social Media Manager will be responsible for the creation, administration, and deactivation of the department's social media accounts and/or platforms.
2. Social Media Manager(s) must:
 - a. be a County of San Mateo employee;
 - b. be familiar with County of San Mateo policies; and
 - c. understand the scope of responsibility and be appropriately trained by the department to interact on social media on behalf of a department.
 - d. add the County's Chief Communications Officer and Social Media Coordinator as administrators on all Departmental social media accounts
3. The department is required to complete a County social media Work Plan (template available from the County's Social Media Coordinator) and submit it to the Social Media Coordinator and Chief Communications Officer for approval prior to opening new social media accounts. Accounts that do not follow the pre-approval process shall be deleted.
4. To "engage with" another social media account includes but is not limited to following, liking, reacting to, sharing, commenting on, linking to, retweeting, forwarding, direct messaging, favoriting or any other form of social media interaction.
5. Departmental social media accounts must not engage with political campaign sites or social media accounts and must exercise caution to avoid the appearance of endorsing a candidate, political party, or specific elected official.
6. Departmental social media accounts may engage with posts by elected officials made in the scope of the official's duties, unless doing so would appear to endorse a political candidate, party or campaign. Departments must exercise caution to avoid even the appearance of any such endorsement. Departmental social media accounts may not engage with elected officials' personal social media accounts that are not used for official County business.
7. Departments must comply with the County's [Legislative Advocacy policy](#) in their social media posts and engagement, and may not use social media to take positions regarding political issues that are or will foreseeably be pending before the Board of Supervisors, or on pending state or federal legislation.
8. Departmental social media accounts may not engage with partisan sites that take positions on candidates, political parties, ballot measures, or campaigns (including but not limited to partisan newspapers, blogs, or other media). Departments may not engage with any organizations whose primary purpose is supporting or opposing certain candidates, parties, political platforms, or ballot measures, or engage with

partisan posts made by any other organizations or entities.

9. Departments shall not take any action to use County resources to advocate for or against any pending ballot measure, including using departmental social media accounts to support or oppose the measure in any way.
10. If a department plans to collect contact information by way of social media services, it must do so by allowing members of the public to opt-in (rather than requiring them to opt-out of such collection) and must include language regarding “Dissemination of Information.”
11. Department and department-related matters may not be posted outside of the department’s official social media account or website without express permission by the department head.

B. *Terms of Use*

Departments that utilize social media resources should be aware that each site or resource likely has its own terms and conditions of use, and some of those terms and conditions may create a conflict with County policies. Each department must review the terms and conditions of use. The department’s assigned attorney in the Office of the County Attorney should be consulted regarding all such Terms of Use before the department decides to use the site or resource, but it is the department’s responsibility to understand the site’s restrictions and rules.

C. *First Amendment*

Departments using social media shall also consider whether to permit users other than the department to generate content, such as by posting comments or reactions. The United States and California Constitutions protect the freedom of speech of citizens from undue restrictions by the government. Because the County and its departments are government actors, the ways in which they can limit speech are restricted by these constitutional protections, including the First Amendment.

If a department’s use of a site is only informational, such as using a site to disseminate information without permitting comments by other participants, the department may list information that would be appropriate for sharing with the public. However, if the department decides to use the site to permit user-generated content (i.e., content from outside the department) to be posted or shared, First Amendment issues can come into play. The department’s assigned attorney in the Office of the County Attorney should be consulted regarding specific concerns.

D. *Types of Social Media*

The department must adopt one of the following designations for its use of social media when drafting its Work Plan and follow the accompanying requirements below before beginning its use of the social media site:

a - Information sharing only: If the exclusive purpose of the site/resource is to share departmental information, with no posting of information by anyone other than authorized department representatives, then the use of the site or resource is considered “information sharing” and does not create any kind of public forum. This is true even if others can send messages to the department through the resource or site. So long as such messages are not posted for others to view, the use remains “information sharing” only. Creating a list of information based on input from others, such as a public list of frequently asked questions, does not turn the use into a public forum.

b - Non-public forum: If the department wishes to create a limited, non-public forum for use by a small set of individuals, such as by department employees only, it can impose restrictions on the kinds of topics it wishes to encourage input on or may limit the types of permitted views on the posted topic. To the extent that social media resources are used for this purpose, the department should limit access to the intended users so as to avoid permitting authorized users to have comments broadcast to the general public, thus destroying the non-public nature of the forum. The level of control associated with this kind of non-public forum requires clear restrictions determined in advance regarding the limits on content and that prevent general access. As with public forums below, the restrictions on topics or even on particular viewpoints should be clear, objective, and uniformly applied.

c - Public forum: If the department opts to permit comments, feedback, or other information to be posted by anyone other than the department representative(s) for viewing by the public or other users, the department may be creating a public forum of some kind. The ability of the department to limit, alter, or remove such comments, feedback, or other information depends on the policies adopted by the department prior to allowing such content.

In no event should the department engage in discrimination based on the viewpoint expressed in such comments, feedback, or other information. Once the forum is opened to participation by the public, the department must remain viewpoint neutral. However, there are ways in which the department can limit or control the content of such forums. Also, the department must be clear to users about the type of forum it is creating, indicate any limits on the types of content allowed in clear, unambiguous terms, and be consistent in the application of those limits on all comments, feedback, or other information. Accordingly, the department must decide which of the following types of forums it wishes to create:

c(1) - Designated public forum: If the department wishes to allow substantial input from others with minimum restrictions, it can create a designated public forum. In general, a designated public forum only

permits content-neutral limitations on the kind of speech. Thus, a department could limit the timeframe during which comments on a particular topic are permitted, or it could restrict all comments to a certain length. In order to limit the kinds of views expressed, the department would need to show that the restrictions are necessary to serve a compelling government interest and that the restriction is narrowly drawn to achieve that end. Such restrictions can be hard to draft, and accordingly a department should create a designated public forum with caution. In creating such a forum, the department is generally limiting its own ability to remove content that may be deemed divisive, upsetting, or even off-topic.

c(2) - Limited public forum: If the department wishes to allow input from others that is limited to specific topics, it can create a limited public forum. In general, although a limited public forum still only permits content-neutral limitations on the kind of speech, it does allow for speech to be restricted to certain topics. For example, a department could create a forum for others to post questions regarding a particular subject matter.

So long as the department is clear about the topical restrictions and is uniform in its enforcement, the department has the ability to remove comments that are off topic. However, the department should still be aware that it will need to leave in place comments that, although perhaps off-color and non-productive, still relate to the topic. So, if the department asks for questions regarding its policies for dealing with the public, and someone posts a facetious question that suggests the Department Head has no interest in dealing with the public, that comment should not be removed. When in doubt about whether a comment can be removed, the department should consult with the Deputy County Attorney assigned to the department at the County Attorney's Office.

To help create a limited public forum, the department should avoid subjective or overly general criteria regarding the subject-matter limitations. The more limited, more objective, and more specific the criteria is, the better. Also, the department should consider whether it wants to restrict participation using objective criteria (e.g., limiting participation to employees or certain groups of constituents) or utilize administrative control over access to the forum. Both such controls can help create a secure limited public forum. Also, in a limited public forum, policies against "personal attacks" may be permissible so long as the limitation is reasonably necessary to encourage public participation and foster discussion of the issues for which the forum was created.

Once the department determines what kind of First Amendment forum it wishes to create, the department should draft the Terms of Use it will link to or post on the social media site using one of the four templates available on the intranet via the Social Media Handbook.

E. Required Branding

Departmental social media sites shall be created and maintained with identifiable characteristics of an official County site that distinguishes them from non-professional or personal uses.

1. County social media network accounts shall be created using an official County email account.
2. Contact information should display an official County email address, include language regarding the fact that the account is the “official account,” and provide a link to the County or department website.
3. Use the County logo and/or department logo on social media accounts to confirm authenticity of site.

F. Social Media Networks

Departments shall only utilize County-approved social media networks for hosting official County social media sites listed in the County of San Mateo Social Media Handbook unless they get written approval by the County’s Social Media Coordinator or Chief Communications Officer. New social media networks under consideration will be reviewed and approved by the County Executive's Office and the County’s Social Media Coordinator as part of the workplan submission requirement with consultation with the County Attorney’s Office and Human Resources when appropriate.

Departments must abide by Workforce Member usage standards to be developed by the County’s Social Media Coordinator and Chief Communications Officer to optimize government use of the site for each approved social media network.

G. Procedures

1. Usage Standards for County Social Media Accounts

Workforce Members who are authorized to use social media for County-related business must comply with the following standards:

1. You are responsible for the content you publish.
2. Do not publish content outside of your department’s official social media account that has to do with your department or department-related matters unless you have been authorized to do so by your Department Head.
3. Respect copyright law and avoid posting content that contains photos, videos,

- music, or sound from another person or entity unless you have permission.
4. Protect confidential information and never directly or indirectly disclose sensitive, proprietary, or legally protected personal information, reports, policies or plans from your department.
 5. Protect personal privacy and do not post photos and information about employees, clients, patients or members of the public without permission.
 6. Never delete an erroneous post. Respond to your own mistakes by owning up to the error and correcting it quickly in the comments and/or with a new post.
 7. Understand users' First Amendment rights and never moderate comments to restrict speech and opinions with which the department disagrees.
 8. Handle negative comments by providing accurate information in the spirit of being helpful or acknowledging that it is possible to hold different points of view.
 9. Before blocking users and/or hiding or removing comments or unacceptable content that violates this policy and the department's Terms of Use, the department should consult with the County Attorney's Office and the Chief Communications Officer.
 10. Identify yourself—name and, when relevant, role at your department—when you discuss department or department-related matters and/or reply to comments and messages.
 11. Do not deny or confirm rumors or suggest either denial or confirmation by insinuation.
 12. Respect your audience and coworkers and never use or "like" content that includes symbols, photos, emojis, words, or visual motifs stating or representing ethnic slurs, personal insults, or obscenity.
 13. Refer media questions to your department's designated media contact or the County Chief Communications Officer.

H. County Account Content Standards

Acceptable forms of content include, but are not limited to:

- Text;
- Video and photographs - Be sure to check images and videos for sensitive information in the background and obtain [media releases](#) as needed;
- Graphics; and
- Links (hyperlinks).

I. Unacceptable Content

- Profane language or content.
- Explicit sexual or harassing content, including links to such content.

- Violent or threatening content.
- Solicitation of commerce, commercial activities, fund-raising or sponsorship.
- Illegal activity.
- Information that may compromise the safety or security of the public or public systems.
- Content that violates a legal ownership interest of any other party, such as trademark or copyright infringement.
- Political activities by County employees in an official capacity or on behalf of the Department.
- Posts by employees that violate County of San Mateo or Departmental policies and procedures.
- Personal information about employees.
- Off-topic discussions or postings (for limited public forums).
- Making or publishing of false or defamatory statements concerning any individual.
- Links that are:
 - a. Primarily commercial in nature; or
 - b. Charge a user-fee for access.

J. Content Deletion

If a departmental social media account or website opts to create any type of public forum (as discussed above) and has a stated Terms of Use permitting content moderation, the departmental Social Media Manager must diligently monitor the site to ensure compliance with the Terms of Use. Unacceptable content that does not comply with the Terms of Use should be hidden or removed as soon as possible after consultation with the County Attorney’s Office and the Chief Communications Officer.

- A copy of every deleted item must be archived. Where possible, the following language can be used to notify individuals about the removal of their content:

“Your recent post is in violation of San Mateo County’s Social Media Policy and the department’s Terms of Use for this social media service.

The County reserves the right to remove, hide, or block such content. Please refrain from posting inappropriate content in the future. Thank you for your understanding.”

- Removing or blocking an individual from future posting is not recommended. Departments should consult with assigned Deputy County Attorney to determine whether such action would be appropriate.
- Tagged Material - Material that is tagged (to departmental accounts should be monitored to ensure appropriateness. If the tag violates this policy or the Terms of Use, the Social Media Manager or designee can mute or block the accounts that tag the County with unacceptable content.

K. *Software*

Software purchased in conjunction or used for social media purposes must undergo the Administrative Memo B-1 contract review process. All software must conform to County standards and policies.

L. *Security*

Departments must make every effort to protect and secure their social media accounts from unauthorized access. Workforce Members must never leave computing devices unattended or unlocked when logged on to a social media account.

All social media sites must be actively reviewed on a regular basis. All unused plugins or site enhancements as well as inactive users must be deleted. All plugins must be up to date.

All user account must adhere to the least privilege principle and only assign rights that required to do the job; limit the number of people who have administrative access. Administrator accounts should be renamed and should not be “admin.” Administrator accounts should be audited by the department’s Social Media Manager for relevancy and recent use. Set user to automatically log out users when idle, if possible.

It is recommended that departments use social media networks or sites that support the use of the County multi-factor authentication solution. If a department chooses to use a site that does not support the County’s multi-factor authentication solution, then departments should work with the Information Services Department (ISD) to determine the best options to ensure the security of data and user accounts on those social media platforms.

Only County-issued devices with up-to-date end point security software installed should be used to manage departmental social media data and sites.

M. *Security Breach*

In the event of a security breach or if social media use is compromised, the department or Workforce Member should follow the Security Incident Reporting process:

1. Contact ISD immediately and report the incident to both the County Chief Communications Officer and the Chief Information Officer
2. If possible, login and change password and login information immediately.
3. Look for signs of damage.
4. Fill out the ISD Security Incident Report form and forward it to the Information Services Department Information Security Officer.
5. Report incident to Risk Management if there are indications of compromise of employee, personal, or financial information is impacted.
6. Consult with the County's Chief Communications Officer prior to acknowledging the security breach to social media followers.

N. *Password*

Departments are to adhere to the [County's Password Policy](#) when setting login credentials, including but not limited to usernames and passwords for social media accounts. Passwords must have a minimum of eight (8) characters with alphanumeric characters, upper and lowercase, with at least two special characters. All passwords must be changed every 60 days. If the site does not automatically require the regular changing of the passwords, department must manually change the passwords on a regular basis of every 60 days. All passwords must be secured and not shared.

O. *Compliance with Laws*

1. The Brown Act

The Ralph M. Brown Act (Gov. Code, § 549501 et seq.) governs meetings conducted by local legislative bodies, such as boards of supervisors, city councils, and school boards. While the Act only applies to multi-member bodies such as councils, boards, commissions and committees, which are created for the purpose of reaching collaborative decisions through public discussion and debate, departments must remain aware that the Brown Act applies to meetings of a majority of the members of such multi-member bodies, including “serial meetings,” which can be held when members collect information or conduct business by communication in sequence, such as by e-mail or the Internet such as discussion threads. The department should avoid having its use of social media create such a meeting of multi-member bodies. Elected officials and Board members each have an individual responsibility to exercise caution to avoid inadvertently conducting a serial meeting through their use of social media and should consult the County Attorney's Office with any concerns or questions.

2. Public Records Act Requests

Content posted on the County's social media sites may be considered a public record and may be subject to disclosure under California's Public Record Act (“PRA” – Government Code §§ 7920.000 et. seq.). PRA requests to produce posts on a County social media site shall be referred to the County Attorney's Office for review and response and notification made to the Chief Communications Officer.

3. *Record Retention*

Each department will be responsible for retaining and maintaining records in an easily accessible format that tracks account information. Departments can use the archiving platform contract administered by the County Executive's Office to ensure compliance or one of their own choosing. All content should be fully accessible to those requesting documents from the social media site. No records may be deleted without cause and copies of all deleted items, including items that has been removed due to unacceptable content, must be retained.

4. *Copyrighted Matters/Intellectual Property*

Social media participants must abide by laws governing copyright and fair use of copyrighted material owned by others. Never reprint whole articles or publications without first receiving written permission from the publication owner or confirming the copying is permitted. Avoid posting content that contains photos, videos, music, or sound from another person or entity unless you have permission to re-post such material.

P. Personal Use of Social Media by Workforce Members

Workforce Members' personal uses of social media are subject to First Amendment protections, as well as permissible restrictions. Any personal use of social media sites by Workforce Members must not be attributable to the County, the department, or the employee's job function with the County.

Workforce Members who use social media accounts outside of work for non-work purposes are encouraged to engage responsibly and must comply with the following standards:

1. Do not use County e-mail address to register for personal social media accounts, unless authorized to do so within the scope of the job function, as discussed above.
2. Do not post the County's confidential or other proprietary information, or the confidential or proprietary information of a third party that was obtained in the course of work for the County.
3. Do not display the San Mateo County seal or other official County logos, emblems or patches on your personal social media accounts in a way that suggests official County endorsement.
4. Employees may identify their role with the County on personal social media but need to state that this is not an official County message.
5. Employees are not required to include a disclaimer on personal social media accounts. However, if they choose to discuss County

policies or their working conditions, it is highly recommended they state that their views are their own. For example, "The postings and activities on this site are my own and do not necessarily represent the County of San Mateo's positions, strategies or opinions."

6. Board members and elected officials must continue to exercise caution to ensure that their personal use of social media continues to comply with all laws pertaining to political activity and open meetings.

Q. Enforcement

Official use of social media services is the responsibility of the Department Director. Department Directors, or their designees, will review, approve, and routinely monitor all use of social media for their department to ensure compliance with this policy and the Social Media Handbook.

Any violations of this policy shall be reported to the Department Director or designee. Violations will be investigated and may result in disciplinary action, up to and including dismissal from County employment.

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