



Date: June 9, 2022

To: Board of Directors

From: Ann Danforth, General Counsel

Subject: Proposed New Social Media Policy

Recommendation:

Review, discuss, amend as appropriate the draft policy and adopt the draft resolution enacting said policy.

Background, Discussion and Analysis:

The District maintains a website to enable the public to access important information about District business. Such websites have become ubiquitous in modern life and are highly effective. However, California public agencies are subject to requirements that do not apply to private entities, such as the First Amendment and the Public Records Act. The District should manage its social media carefully to avoid (1) possible freedom of speech issues; and (2) generating records that would be difficult to produce in response to a Public Records Act request.

Staff first presented a draft policy to the Board on September 10, 2020. Director Deppe asked to work with staff on revisions to the draft and the Board continued the matter. The attached draft reflects the collaboration with Director Deppe.

Every public agency that maintains a site for communications for the public, be it an old-fashioned bulletin board or a sophisticated social media presence, must be mindful of the Constitutional implications of those communications. The First Amendment establishes an individual right to freedom of speech and prohibits government agencies from discriminating between different viewpoints. The District can, however limit posting on its website to information about District operations and services.

The proposed policy would place any use or maintenance of District social media under the control of the District Manager or his designee, who would limit content to publicly available information. The policy also sets objective limits on the information that third parties may post on the District website, thereby avoiding a First Amendment problem.

FISCAL IMPACT

None

RECOMMENDATION

Staff recommends that the Board hear public testimony, consider the proposed draft policy, direct staff to make any changes that the Board deems appropriate and adopt the draft resolution.

ATTACHMENTS

Redlined Draft Social Media Policy
Resolution No. 2022-15
Draft Social Media Policy

SUBMITTED BY:

Ann Danforth
General Counsel

3190.3 Social Media Use 3190.3.1 Purpose and Applicability:

The District uses social media to communicate with District residents about District services, events and issues. The District has an overriding interest in protecting the integrity of the information posted on its social media sites and the content that is attributed to the District, its staff, and its officials. This policy outlines the protocol and procedures for use of social media to publicize District services and events. In addition, this policy addresses and the responsibilities of employees' and District officials' the responsibilities with regard to social media, and the use of District resources (time/equipment) and, as well as responsibilities related to the public records and open meeting laws. Nothing in this Policy shall be applied to prohibit or infringe upon any communication, speech or expression that is protected or privileged under law, including, speech and expression protected under state or federal constitutions, as well as labor laws or other applicable laws.

3190.3.2 Definitions:

a) "Social Media" refers to forms of electronic communication (such as websites for social networking) through which users create online communities to share information, ideas, personal messages, photographs, videos, and other content. Various forms of discussions and information sharing, including social networks, blogs, video sharing, podcasts, wikis, message boards, and online forums. Technologies include picture sharing, wall postings, fan pages, email, instant messaging and music sharing. Examples of social media applications include but are not limited to Google and Yahoo Groups, (reference, social networking), Wikipedia (reference), Facebook (social networking), YouTube (social networking and video sharing), Flickr, (photo sharing), Twitter (social net-working and microblogging), LinkedIn (business networking), and news media comment sharing/blogging.

b) "District social media sites" are social media sites that the District establishes and maintains and over which it has control over all posting except for ads or hyperlinks by the social media site's owners, vendors or partners.

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b)c) Social Networking: The practice of expanding business and/or social contacts by making connections through web-based applicationselectronic media. This policy focuses on social networking as it relates to the Internet to promote such connections for District business and for employees, elected and appointed officials who are using this medium in the conduct of official District business. "Social Media Director" is the General Manager or that person's designee to manage the District's social media.

d) "Posts" or "postings" means information, articles, pictures, videos, or any other form of communication posted on a District social media site.

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3190.3.3 Policy: ~~The Social Media Director must approve the creation of any No District social media site may be created without the approval of the General Manager or his or her designee.~~ All District social media sites created on behalf of the District, by its employees on District time, or using other District resources are the property of the District and shall be administered and regularly monitored by ~~Social Media Director~~~~the General Manager or his/her designee.~~ These social media sites shall be used only to inform the public about District business, services and events. For purposes of this policy, "District services" shall include recreation and enrichment programs located on or in District property or otherwise under District auspices. Individual departments may not have their own pages/sites without prior approval of the Social Media Director. ~~Individual departments wishing to add content to District social media sites may submit a request to the General Manager.~~ The District's web site, www.kppcsd.org, will ~~remain be~~ the primary location for content regarding District business, services and events. The Social Media Director must approve any posting to District social media sites. ~~Individual departments wishing to add content to District social media sites may submit a request to the General Manager.~~ Whenever possible, links within social media formats should direct users to the District website for more information, forms, documents, or online services necessary to conduct business with the District. District social media sites shall clearly state that such sites are maintained by the District and that the sites comply with this Social Media Policy.

3190.3.4 District employees and appointed and elected officials shall not disclose information about confidential District business on the District's social media sites, personal social media sites, or otherwise. In addition, all use of social media sites by elected and appointed officials shall ~~be in compliance~~comply with California's open meeting laws, which prohibit serial meetings of a majority of the Board or another legislative body of the District via email or other electronic means. Members of the Board, committees and/or legislative bodies shall not respond to, "like", "share", retweet, or otherwise participate in any published postings, or use the platform or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body on which they serve. Employees and elected or appointed officials' posts to non-District social media sites are a reflection of their own views and not necessarily those of the District and should not suggest otherwise.

3190.3.5 Posting/Commenting Guidelines:

- a) ~~All postings made by the District to social media sites will contain information and content that has already been published or broadcast by the District.~~ The District will not comment on other social media ~~member's~~ sites. All ~~District official~~ social media postings ~~by the District~~ will be done solely on the District's social media sites or in response to postings made on the District's social media sites. District ~~Officers, employees and agents of the District representing it on District social media sites~~ shall conduct themselves professionally and in accordance with all District policies. All District social media sites shall use authorized District contact information for account set-up, monitoring and access. Personal email accounts or

phone numbers may not be used to set up, monitoring, or post to a District social media platform.

b) The District reserves the right to remove from its social media sites content that it finds to violate this policy or applicable law. Any participants on the District's social media sites who are in continual violation of the postings/commenting guidelines may be barred from further use of the District's site. The District will only post photos for which it has copyright or the owner's permission.

c) The California Public Records Act applies to District social media platforms ~~are subject to the California Public Records Act.~~ Any content maintained on a District social media site, ~~that is related to District business,~~ including a list of subscribers, posted communication, and communication submitted for posting, may be considered a public record and subject to public disclosure. All postings on District social media sites shall be maintained consistently with the Public Records Act, provided, however, that any material removed from a District social media site consistently with this policy shall be considered a preliminary draft, note or memorandum not retained by the District in the ordinary course of business and shall not constitute a public record of the District required to be retained consistently with the District's records retention schedules.

~~d) District social media sites shall not use any chat functions. in any social media sites will not be used.~~

~~e) The District reserves the right to modify, suspend terminate any District social media site without notice ~~or to temporarily or permanently suspend access to District social media~~ as to some or all persons at any time. ~~The District reserves the right to implement or remove any functionality of its social media platforms, in the discretion of the General Manager or his or her designee. This includes, but is not limited to, information, articles, pictures, videos, or any other form of communication that can be posted on a District social media platform.~~~~

~~e)f) District social media sites may contain content, including but not limited to, advertisements or hyperlinks over which the District has no control. The District does not endorse any hyperlink or advertisement placed on District social media sites by the social media site's owners, vendors, or partners.~~

~~f) District employees may post to District social media platforms only during working hours. After hours or weekend postings may only be made with prior approval of the General Manager or his or her designee.~~

~~g) Any person authorized to post items on any of the District's social media platforms shall review, be familiar with, and comply with this Policy and each social media platform's terms and conditions of use.~~

~~h)g) Any person authorized to post items on behalf of the District to any of the District's social media platforms No posting shall express personal views or~~

concerns ~~through such postings. The Social Media Director shall authorize only~~
~~Instead, postings on any of the District's social media platforms on behalf of the~~
~~District shall only that~~ reflect the views of the District.

~~h)~~ Posts must contain information that is freely available to the public and not be confidential as defined by any District policy or state or federal law.

~~i)~~ Posts may NOT contain any personal information, except for the names of persons being available for contact by the public as representatives of the District. Posts to District social media sites shall NOT contain any of the following:

- 1) Comments that are not topically related to the information commented upon;
- 2) Comments in support of, or opposition to, political campaigns, candidates or ballot measures;
- 3) Profane language or content;
- 4) Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, or status with regard to public assistance, national origin, physical or mental disability or sexual orientation, or any other category protected by federal, state, or local law;
- 5) Sexual content or links to sexual content;
- 6) Solicitations of commerce;
- 7) Conduct or encouragement of illegal activity;
- 8) Information that may tend to compromise the safety or security of the public or public systems; or
- 9) Content that violates a legal ownership interest of any other party.

~~10)~~ Photographs containing an identifiable individual unless (a) said individual has given consent in writing; (b) unless the photograph was taken at a public event where the individual had no expectation of privacy; or (c) the photograph is a public record under state or federal law.

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Procedures:

3190.3.6 The ~~General Manager or his designee~~ Social Media Director ~~is will be~~ responsible for responding to comments and messages as appropriate. The District will direct users to the District's web site for more information, forms, documents or online services necessary to conduct business with the District.

3190.3.7 The District may invite others to participate in its social media sites. Such invitations will be based upon the best interests of the District as determined by the ~~General Manager or his or her designee.~~ Social Media Director.

Responsibilities:

3190.3.8 ~~It is the responsibility of E~~employees and appointed and elected officials are responsible for ~~to understand~~ing the procedures as outlined in this policy.

3190.3.9 Employees ~~who are not designated by the General Manager to access social media sites for District business~~other than the Social Media Director are prohibited from accessing social media sites utilizing the District computer equipment and/ or the District's web access. ~~While at work, e~~Employees other than the Social Media Director who are not granted access via District systems and computing equipment may use personal computing devices and personal web accounts to access social media sites only during non-working hours such as lunch periods and breaks. State law provides that more than occasional or incidental personal use of District resources is a crime.

3190.3.10 The ~~Social Media Director~~ General Manager will determine if a requested use of District social media sites or other District resources is appropriate and complies with this policy. The Social Media Director is also responsible for removing outdated postings.

3190.3.11 All content on District social media sites must comply with District web standards, the rules and regulation of the social media site provider, including privacy policies, and applicable state law. ~~Employee or District confidentiality shall be maintained in accordance with all applicable laws and District policies.~~ If a question arises regarding the use or posting of confidential information on a social media site, the matter shall be referred to the General Manager. The information in question shall not be posted, or if already posted, shall be removed until the General Manager or, at that person's request, the District's General Counsel, opines on the matter. ~~an opinion is rendered by General Manager or, at his or her request, the District's General Counsel.~~ Notwithstanding the opinion of the General Counsel, the General Manager reserves the right to restrict or remove District information from a District social media site if the General Manager concludes the information does not serve the best interest of the District.

~~**3190.3.12** All social media based services to be developed, designed, managed by or purchased from any third party source for District use requires appropriate budget authority and approval from the Board of Directors.~~

~~**3190.3.123**~~ The District reserves the right to change, modify, or amend all or part of this policy at any time.

POLICY 3190.3A: District Website

3190.3A.1 Purpose: To enhance communication with residents about District services and operations, provide timely information regarding District business, and streamline processes.

3190.3A.2 Policy: ~~It is~~The District's policy is ~~policy~~ to control the content and accuracy of the information provided on the District's Website. To the extent practicable, the rules and procedures in Policy 3190.3 shall apply to the District Website except as otherwise specified herein. Posting of hyperlinks and information from or about outside agencies shall be limited

to other local related government agencies such as Contra Costa County, and the Kensington Fire Protection ~~District~~District and the West Contra Costa Unified School District. All information will be directed to the Social Media~~General Manager's designee or District employee acting in the capacity of the District Web manager~~. The Social Media Director must approve aAll information posted on the District website must be consistent with the District's mission and public interest and the District's social media policy.

3190.3A.3 Procedure: Any District Board Director, official or employee may request postings to the District website through the Social Media Director~~General Manager or his designated representative~~. Postings must be non-political in nature. The Social Media Director~~General Manager~~ shall approve, modify, or deny the request. ~~It is the~~The submitter's ~~responsibility to~~shall check the item for accuracy both prior to submission and after posting to the website to insure no ~~inadvertent~~ errors appear on the final document. The submitter shall inspect the posted submission within 24 hours of posting.

- ~~a) The General Manager or his or her designee shall submit the approved request for inclusion on the website and, when necessary, to suggest alternative solutions.~~
- ~~b) The General Manager or his or her designee shall also manage removal of outdated postings.~~

3190.3A.3 Privacy Policy.

The District's privacy following privacy policy shall be posted ~~to~~on the District's website under a link on the home page. The Social Media Director shall develop the exact language of the privacy policy, which shall contain the following information:

- (a) The date that the District last updated the policy;
- (b) A statement that by accessing or using the website, the user agrees to all terms of the policy;
- (c) Notice that the District may change the policy at any time;
- (d) A description of the information that may be collected and disclosed;
- ~~(a)~~(c) A non-exclusive list of potential uses of the information;

~~2420~~3190.4 Accessibility.

The District's website shall include a link on home page directing users to a statement regarding access to the website for individuals with disabilities. The Social Media Director shall develop the exact language of the privacy policy, which shall state the District's commitment to full accessibility to employees and members of the public with disabilities and provide instructions as to how to obtain information and services in an accessible format.

The following accessibility statement shall be posted to the District's website under a link on the home page:

~~The Kensington Police Protection and Community Services District ("KPPCSD," "District," "we" or "us") is committed to providing access to our electronic and information technology, including our website, for individuals with disabilities in accordance with Section 508 of the Rehabilitation Act.~~

~~Section 508 requires us to ensure that District employees with disabilities, and members of the public with disabilities seeking information or services from us, have access to and use of information and data that is comparable to the access and use by District employees, or members of the public who are not individuals with disabilities, unless an undue burden would be imposed on us. To meet this commitment, we strive toward our website meeting or exceeding the Section 508 standards.~~

~~If you have a disability and the format of any materials on our website interferes with your ability to access the information, please contact the District at admin@kppcsd.org. please indicate the nature of the accessibility problem, the web address of the requested material, the preferred format in which you want to receive the material (electronic format (ASCII, etc.), standard print, large print, etc.) and your contact information. The District's Web manager will undertake the proper procedure to ensure your request receives a response. To enable us to respond in a manner most helpful to you,~~

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RESOLUTION NO. 2022-15

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE
KENSINGTON POLICE PROTECTION AND COMMUNITY
SERVICES DISTRICT ADOPTING POLICY 3190.3**

The Board of Directors of the Kensington Police Protection and Community Services District (hereafter referred to as the "Board of Directors") does find as follows:

WHEREAS, the Board has adopted new Policies 1000, 2000, 3000, 4000 and 4100, and several amendments thereto, as components of a new Policy and Procedures Manual ("New Manual");

WHEREAS, the New Manual policies are all based on the 2017 model published by the California Special District Association and

WHEREAS, the District maintains a website and other social media to communicate with the public regarding District operations and services to ensure that the District's social media is used in the best interests of the District and community and that the content thereof accurately reflects the information that the District intends to convey;

WHEREAS, the Board now wishes to add Policy 3190.3, regarding the use of District social media; and therefore posted a draft of said new policy on its website on or before June 6, 2022; and

WHEREAS, on June 9, 2022, the Board considered the proposed new Policy 3190.3, took public testimony and decided to adopt proposed new policy.

NOW, THEREFORE, THE BOARD OF DIRECTORS DOES RESOLVE AS FOLLOWS:

Policy 3190.3 is hereby added the District's Police and Procedures Manual, to provide as set forth in the exhibit attached hereto and incorporated herein by reference.

PASSED AND ADOPTED by the Board of Directors of the Kensington Police Protection and Community Services District upon motion by Director Deppe, seconded by President Hacaj on Thursday, the 9th day of June, 2022, by the following vote to wit:

AYES: Directors Deppe, Logan, Sherris-Watt and Hacaj.

NOES: Director Nottoli.

ABSENT: None.

ABSTAINED: None.

Sylvia Hacaj
President, Board of Directors

HEREBY CERTIFY the foregoing resolution was duly and regularly adopted by the Board of Directors of the Kensington Police Protection and Community Services District at the regular meeting of said Board held on Thursday, the 9th day of June, 2022.

Lynelle M. Lewis
District Clerk of the Board

Tony Constantouros
Interim General Manger

3190.3 Social Media Use 3190.3.1 Purpose and Applicability:

The District uses social media to communicate with District residents about District services, events and issues. The District has an overriding interest in protecting the integrity of the information posted on its social media sites and the content that is attributed to the District, its staff, and its officials. This policy outlines the protocol and procedures for use of social media and employees' and District officials' the responsibilities with regard to social media, the use of District resources (time/equipment) and the public records and open meeting laws. Nothing in this Policy shall be applied to prohibit or infringe upon any communication, speech or expression that is protected or privileged under law, including speech and expression protected under state or federal constitutions, as well as labor laws or other applicable laws.

3190.3.2 Definitions:

- a) "Social Media" refers to forms of electronic communication (such as websites for social networking) through which users create online communities to share information, ideas, personal messages, photographs, videos, and other content. Examples of social media applications include but are not limited to Google and Yahoo Groups, (reference, social networking), Wikipedia (reference), Facebook (social networking), YouTube (social networking and video sharing), Flickr, (photo sharing), Twitter (social net-working and microblogging), LinkedIn (business networking), and news media comment sharing/blogging.
- b) "District social media sites" are social media sites that the District establishes and maintains and over which it has control over all posting except for ads or hyperlinks by the social media site's owners, vendors or partners.
- c) "Social Media Director" is the General Manager or that person's designee to manage the District's social media.
- d) "Posts" or "postings" means information, articles, pictures, videos, or any other form of communication posted on a District social media site.

3190.3.3 Policy: The Social Media Director must approve the creation of any social media site. All District social media sites created on behalf of the District, by its employees on District time, or using other District resources are the property of the District and shall be administered and regularly monitored by Social Media Director. These social media sites shall be used only to inform the public about District business, services and events. For purposes of this policy, "District services" shall include recreation and enrichment programs located on or in District property or otherwise under District auspices. Individual departments may not have their own pages/sites without prior approval of the Social Media Director. The District's web site, www.kppcsd.org, will be the primary location for content regarding District business, services and events. The Social Media Director must approve

any posting to District social media sites. Whenever possible, links within social media formats should direct users to the District website for more information, forms, documents, or online services necessary to conduct business with the District. District social media sites shall clearly state that such sites are maintained by the District and that the sites comply with this Social Media Policy.

3190.3.4 District employees and appointed and elected officials shall not disclose information about confidential District business on the District’s social media sites, personal social media sites, or otherwise. In addition, all use of social media sites by elected and appointed officials shall comply with California’s open meeting laws, which prohibit serial meetings of a majority of the Board or another legislative body of the District via email or other electronic means. Members of the Board, committees and/or legislative bodies shall not respond to, “like”, “share”, retweet, or otherwise participate in any published postings, or use the platform or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body on which they serve. Employees and elected or appointed officials’ posts to non-District social media sites are a reflection of their own views and not necessarily those of the District and should not suggest otherwise.

3190.3.5 Posting/Commenting Guidelines:

- a) The District will not comment on other social media sites. All District social media postings will be done solely on the District’s social media sites or in response to postings made on the District’s social media sites. District officers, employees and agents shall conduct themselves professionally and in accordance with all District policies. All District social media sites shall use authorized District contact information for account set-up, monitoring and access. Personal email accounts or phone numbers may not be used to set up, monitoring, or post to a District social media platform.
- b) The District reserves the right to remove from its social media sites content that it finds to violate this policy or applicable law. Any participants on the District’s social media sites who are in continual violation of the postings/commenting guidelines may be barred from further use of the District’s site. The District will only post photos for which it has copyright or the owner’s permission.
- c) The California Public Records Act applies to District social media platforms. Any content maintained on a District social media site, including a list of subscribers, posted communication, and communication submitted for posting, may be considered a public record and subject to public disclosure. All postings on District social media sites shall be maintained consistently with the Public Records Act, provided, however, that any material removed from a District social media site consistently with this policy shall be considered a preliminary draft, note or memorandum not retained by the District in the ordinary course of business and shall not constitute a public record of the District required to be retained consistently with the District’s records retention schedules.

- d) District social media sites shall not use any chat functions.
- e) The District reserves the right to modify, suspend terminate any District social media site without notice as to some or all persons at any time.

- f) District social media sites may contain content, including but not limited to, advertisements or hyperlinks over which the District has no control. The District does not endorse any hyperlink or advertisement placed on District social media sites by the social media site's owners, vendors, or partners.
- g) No posting shall express personal views or concerns. The Social Media Director shall authorize only postings that reflect the views of the District.
- h) Posts must contain information that is freely available to the public and not be confidential as defined by any District policy or state or federal law.
- i) Posts may NOT contain any personal information, except for the names of persons being available for contact by the public as representatives of the District. Posts to District social media sites shall NOT contain any of the following:
 - 1) Comments that are not topically related to the information commented upon;
 - 2) Comments in support of, or opposition to, political campaigns, candidates or ballot measures;
 - 3) Profane language or content;
 - 4) Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, or status with regard to public assistance, national origin, physical or mental disability or sexual orientation, or any other category protected by federal, state, or local law;
 - 5) Sexual content or links to sexual content;
 - 6) Solicitations of commerce;
 - 7) Conduct or encouragement of illegal activity;
 - 8) Information that may tend to compromise the safety or security of the public or public systems; or
 - 9) Content that violates a legal ownership interest of any other party.
 - 10) Photographs containing an identifiable individual unless (a) said individual has given consent in writing; (b) unless the photograph was taken at a public event where the individual had no expectation of privacy; or (c) the photograph is a public record under state or federal law.

Procedures:

3190.3.6 The Social Media Director is responsible for responding to comments and messages as appropriate. The District will direct users to the District's web site for more information, forms, documents or online services necessary to conduct business with the District.

3190.3.7 The District may invite others to participate in its social media sites. Such invitations will be based upon the best interests of the District as determined by the Social Media Director.

Responsibilities:

3190.3.8 Employees and appointed and elected officials are responsible for understanding the procedures as outlined in this policy.

3190.3.9 Employees other than the Social Media Director are prohibited from accessing social media sites utilizing the District computer equipment and/ or the District's web access. Employees other than the Social Media Director may use personal computing devices and personal web accounts to access social media sites only during non-working hours such as lunch periods and breaks. State law provides that more than occasional or incidental personal use of District resources is a crime.

3190.3.10 The Social Media Director will determine if a requested use of District social media sites or other District resources is appropriate and complies with this policy. The Social Media Director is also responsible for removing outdated postings.

3190.3.11 All content on District social media sites must comply with District web standards, the rules and regulation of the social media site provider, including privacy policies, and applicable state law. If a question arises regarding the use or posting of confidential information on a social media site, the matter shall be referred to the General Manager. The information in question shall not be posted, or if already posted, shall be removed until the General Manager or, at that person's request, the District's General Counsel, opines on the matter. Notwithstanding the opinion of the General Counsel, the General Manager reserves the right to restrict or remove District information from a District social media site if the General Manager concludes the information does not serve the best interest of the District.

3190.3.12 The District reserves the right to change, modify, or amend all or part of this policy at any time.

POLICY 3190.3A: District Website

3190.3A.1 Purpose: To enhance communication with residents about District services and operations, provide timely information regarding District business, and streamline processes.

3190.3A.2 Policy: The District’s policy is to control the content and accuracy of the information provided on the District’s Website. To the extent practicable, the rules and procedures in Policy 3190.3 shall apply to the District Website except as otherwise specified herein. Posting of hyperlinks and information from or about outside agencies shall be limited to other local related government agencies such as Contra Costa County, and the Kensington Fire Protection District. All information will be directed to the Social Media. The Social Media Director must approve all information posted on the District website as consistent with the District’s mission and public interest and the District’s social media policy.

3190.3A.3 Procedure: Any District Board Director, official or employee may request postings to the District website through the Social Media Director. Postings must be non-political in nature. The Social Media Director shall approve, modify, or deny the request. The submitter shall check the item for accuracy both prior to submission and after posting to the website to insure no errors appear on the final document. The submitter shall inspect the posted submission within 24 hours of posting.

3190.3A.3 Privacy Policy.

The District’s privacy policy shall be posted on the District’s website under a link on the home page. The Social Media Director shall develop the exact language of the privacy policy, which shall contain the following information:

- (a) The date that the District last updated the policy;
- (b) A statement that by accessing or using the website, the user agrees to all terms of the policy;
- (c) Notice that the District may change the policy at any time;
- (d) A description of the information that may be collected and disclosed;
- (e) A non-exclusive list of potential uses of the information;

3190.4 Accessibility.

The District’s website shall include a link on home page directing users to a statement regarding access to the website for individuals with disabilities. The Social Media Director shall develop the exact language of the privacy policy, which shall state the District’s commitment to full accessibility to employees and members of the public with disabilities and provide instructions as to how to obtain information and services in an accessible format.