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Department of Public Safety - External Communications and Civic Engagement Policy		



Cross Reference: 1-01, 1-02, 8.08, 10.13

I. Purpose

The purpose of the External Communications and Civic Engagement Policy (the “Policy”) is to maintain and reinforce the City of Columbus’ (the “City”) credibility and reputation for respectful treatment of City residents, employees, and officials. The City seeks to provide employees with practical guidance for their personal conduct and communications to the extent they may impact the City’s mission, operations, and legal responsibilities. This Policy covers Department of Public Safety (“Department”) employees’ personal communications, rather than those made on behalf of the City or Department in their official capacity. This Policy does not restrict Department employees’ rights to engage in speech protected under applicable laws and/or statutes.

II. Application

- A. This Policy applies to all personal, external communications from Department employees, regardless of the medium. Examples include, but are not limited to:
1. Printed materials, such as books, newsletters, articles, and brochures;
 2. Electronic materials, such as email, Facebook posts and messages, Tweets, Snapchats, comments on Instagram, and postings to web sites, blogs, chat rooms, LinkedIn, Reddit, YouTube, TikTok, Google+ and other social media sites, including reposts of and reactions to others’ comments; and
 3. Media relations, such as requests for interviews, news releases, and responding to other media inquiries.
- B. Violations of this Policy may result in disciplinary action, up to and including termination of employment.

III. General Principles and Prohibitions

- A. All Department employees have a responsibility to communicate accurate information in a professional manner and to ensure that their conduct, even in a personal capacity, follows all relevant City policies. Examples of current relevant policies include, but are not limited to:
1. Central Work Rules;
 2. Rules of Conduct;
 3. Equal Employment Opportunity, Discrimination/Harassment, and Americans with Disabilities Act Policy; and
 4. Comprehensive Electronic Communications Policy.

- B. The City understands that personal external communications can be a fun and rewarding way for employees to share their lives and opinions with family, friends, community residents, and co-workers around the world. But the use of personal external communications carries with it certain responsibilities. It is important for Department employees to remember their external communications, even though viewed as “personal,” may reflect on the City. The way Department employees present themselves and portray their colleagues affects the public’s opinion of the City and its operations. Statements intended as personal opinions can be mistaken for official expressions of City policy or position.
- C. The City respects the rights of its employees to express themselves as private citizens under the First Amendment to the degree their speech involves matters of public concern and does not:
 - 1. Impair working relationships within the City;
 - 2. Impede or interfere with their own job requirements or that of another City employee;
 - 3. Violate any City rule, directive, or policy;
 - 4. Impact the City’s operations; or
 - 5. Disclose confidential information such as proprietary or medical information, criminal investigations, or legal or administrative proceedings.
- D. With respect to personal external communications, such as social media, the City does not seek to control purely personal content posted by Department employees on non-City-maintained social media profiles when that content is posted during non-working time and by the Department employee’s own equipment; is unrelated to and does not identify the Department employee’s position with the City; does not impair working relationships within the City; does not impede or interfere with their own job requirements or that of another City employee; does not violate any City rule, directive, or policy, and/or disclose confidential information such as proprietary or medical information, criminal investigations, or legal or administrative proceedings; and is not otherwise disruptive to the City’s operations.

IV. Guidelines For External Communications

- A. Department employees must remember that what they say, write, or post is public and will remain so for a long time. Even personal communications may spread to larger audiences. When speaking at rallies, writing articles, or posting information on social media sites, employees must be aware of the effect their words may have on the community, the City’s operations, their fellow employees, and their own employment.
- B. The following guidelines apply to Department employees’ external communications:
 - 1. Be accurate.
 - a. Department employees are strictly prohibited from posting any information or rumors which a reasonable person would know to be false

- or misleading about residents, the City, supervisors, fellow employees, public officials, City vendors, and other City stakeholders.
- b. Department employees shall ensure they are always honest and accurate when making public statements or posting on the Internet; if a mistake or error is made the employee shall quickly correct it.
2. Be respectful.
 - a. The City expects its employees to be courteous and respectful towards residents, supervisors, fellow employees, public officials, City vendors, City stakeholders, and other individuals at all times. Employees shall consider how their personal conduct and statements may impair their work relationships. If their conduct and statements cause others to question their judgment or objectivity, they may be less effective in their positions.
 - b. At a minimum, Department employees shall not engage in slurs or demeaning behavior based on protected classes, including but not limited to race, color, sex, sexual orientation, gender identity or expression, religion, national origin or ancestry, age, disability, military status, familial status and/or genetic information. Department employees shall also not engage in personal attacks.
 - c. Department employees shall avoid using statements, photographs, videos, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that are defamatory, or that might constitute harassment or bullying.
 - d. Department employees are more likely to resolve personal, work-related grievances or complaints by speaking directly with their co-workers or their immediate supervisor or working through their applicable union representative, rather than by making public statements or posting complaints through a social media outlet.
 - e. Department employees shall report discrimination, harassment, or other misconduct in violation of applicable law or City policies.
 3. Be transparent.
 - a. When confusion or doubt is likely to arise about whether Department employees' public statements or external communications are personal, the City encourages Department employees to include a disclaimer clarifying that their communications reflect only their own personal views and do not necessarily represent the views of the City. Department employees are not ordinarily required to include a clarifying disclaimer on their social media accounts, nor are Department employees who speak at a rally required to state their views are their own; but Department employees must be aware that, without a disclaimer, their written and verbal statements may be interpreted to be sanctioned or endorsed by the City.
 - b. Although the City encourages a disclaimer, Department employees must understand that the inclusion of a disclaimer does not take their

statements outside this Policy nor does it protect the Department employees from discipline in the event that the statement or conduct violates this policy.

- c. Department employees may not suggest or imply their speech or postings represent a City “position” on any topic. Personal social media accounts and email names shall not be linked (***meaning using an actual physical link***) to a City account or site, or tagged as the City’s ***by using a reference to the City in the hashtag*** (e.g., #CPDCop, #CityPolicy).
 - d. Department employees may not represent or speak on behalf of the City except when authorized to do so as part of their position and/or duties.
 - e. Department employees are reminded the Internet archives virtually everything; therefore, even deleted postings can be searched for and identified weeks, months, or even years later.
4. Be compliant.
- a. Department employees shall not disclose any confidential or proprietary information concerning the City in any public medium, or via any personal external communications such as through social media.
 - b. Department employees shall respect copyright, business, and financial disclosure laws, protect sensitive personal, security, or operational information from release, and shall not disclose such confidential information through any personal external communications.
 - c. Department employees shall maintain the confidentiality of Department employees’ and vendors’ medical and other confidential information. Department employees shall not disclose this confidential information in any public medium unless required by public records law.
 - d. Unless authorized by the Department employee’s job duties, employees shall refrain from using personal external communications such as social media while on work time or with equipment that is provided to the Department employees by the City for work purposes. However, Department employees may use social media on their personal devices during authorized meal and break times.
 - e. A City email address shall only be used for City business purposes. Department employees may not use a City email address to register on social networks, blogs, or other online tools utilized for personal use.
5. Seek authorization.
- a. Department employees are not to speak to the media on the City’s, Divisions’ or Department’s behalf, without first contacting, and receiving authorization from the proper Department official or supervisor pursuant to ***Division*** policy.
 - b. Department employees may not use the City’s, City Divisions’ or Department’s logo, seal, insignia, or equipment ***for secondary employment purposes, commercial purposes, or to promote***

or advocate for any non-City organization, or in any manner intended to state or imply they are representing the City or any City Department or Division, without pre-authorization. Employees may use images or videos of themselves in uniform on personal social media, as long as the images or videos are not being used or presented in a way that violates any other portion of this policy.

- c. Unauthorized use of images of citizens collected in the scope of employment and of City employees is prohibited.
6. Communications by leaders and/or employees with public-facing roles will be held to a higher standard.
 - a. Those with leadership responsibilities, such as a supervisor and/or manager, must consider whether the thoughts and opinions they publish, even in clearly personal venues, may be misunderstood as expressing City positions.
 - b. Those with public-facing roles, such as Public Information Officers, shall keep in mind the public is more likely to interpret their statements as expressing City positions.
 - c. The statements of those in leadership and/or public-facing roles will likely have a greater impact on the City's working relationships and operations than the statements of other Department employees.
 - d. The greater a Department employee's level of responsibility, the more likely the employee will be perceived as speaking on behalf of the City; accordingly, the City will hold Department employees with leadership and greater responsibilities to a higher standard than other Department employees.

V. Shared Responsibility

Department employees and management both play an important role in ensuring compliance with this Policy. If a Department employee believes a personal external communication violates this Policy, the employee shall immediately report the communication to his/her supervisor or division or department human resources personnel. The City prohibits taking disciplinary action against Department employees for reporting a possible deviation from this Policy or for cooperating in a related investigation. However, if it is determined that an employee has intentionally fabricated allegations or intentionally pursued a false complaint, then the employee will be disciplined accordingly. Any manager or supervisor who retaliates against a Department employee for reporting a possible deviation from this Policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination of employment.

VI. Inquiries

Questions regarding this Policy should be addressed to Human Resources, Department of Public Safety.