

**DRAFT – TNC CIS for Proposed Digital Media Policy for NCs: discussion/motion**

**Summary:** The Tarzana Neighborhood Council appreciates the effort that went into this policy and the need for NCs to have and implement a digital media policy; however, we would prefer that this serve as a template for a policy that NCs would tailor and adopt on their own. Our full response to the Policy is attached. Neighborhood Councils were created to promote more citizen participation in government and make government more responsive to local needs. This policy is a case of overreach, and informed by too narrow a conception of NC outreach efforts. It would take away the ability to provide and promote information to our communities in a timely and robust manner. Therefore, we are opposed to this policy.

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**DRAFT – TNC Letter regarding response to Proposed Digital Media Policy for Neighborhood Councils**

DATE

Board of Neighborhood Commissioners Los Angeles City Hall  
200 N. Spring St. #2005  
Los Angeles, CA 90012

Re: Comments on the Digital Media Policy

Dear Commissioners:

We at the Tarzana Neighborhood Council (TNC) appreciate the effort to set some parameters around proper use of social media. Best practices for administration of websites and social media accounts as well as special responsibilities of City entities are not always obvious, so the Tarzana Neighborhood Council appreciates guidance.

Similar to some of the concerns addressed by the Bel Air Beverly Crest NC and the Palms NC; in general we find two major issues with this policy. It is informed by too narrow a view of Neighborhood Council's chartered purpose and it is too cumbersome to implement, taking valuable time and bandwidth away from the ability to implement the Council's chartered purpose. Neighborhood Councils are run by volunteers and are meant to operate with a degree of autonomy so we would like to register an objection to the presentation of this policy as a whole. We believe that behavioral issues should be addressed in the Code of Conduct and Brown Act and addressed via training. We would prefer NCs developed a digital media policy with this draft presented as a template. Our primary concerns include:

**Limited View of NC's Purpose**

(Item 8.1) The policy states that "Proper use for a neighborhood council's website, social media, or newsletters/reports is the promotion of neighborhood council membership and attendance at meetings and promotion of approved and authorized neighborhood council events."

We understand the purpose of Neighborhood Councils is: “to promote more citizen participation in government and make government more responsive to local needs” and further to “monitor the delivery of City services.” In our view any communication that advances these goals or contributes to fulfillment of these purposes is proper use of digital media or any other type of media. Some recent examples can include informing Tarzana residents about renter’s relief, safety precautions for COVID-19, amplifying the voices of our elected leaders or announcing NPGs given to local food pantries to aid relief due to COVID-19.

We certainly agree that “the development and use of Neighborhood Council Digital Communications for personal gain and use is strictly prohibited.”

### **Overreach by DONE and BONC**

Enforcement of these policies are delegated to the Department of Neighborhood Empowerment (DONE) and the City Clerk who may, at what appears to be their discretion, suspend Neighborhood Council’s digital media accounts. The mechanism of this suspension would necessarily involve control of the accounts that the Department will have due to the requirement of handing over passwords and usernames for all accounts to them. This step is said to be “primarily for security purposes” and to “assist neighborhood councils in regaining access to their accounts,” but this would also be the only way a suspension could be implemented. We do not believe DONE and the City Clerk should be able to suspend Neighborhood Councils’ digital media accounts at their discretion or have access to neighborhood council account information. We believe that Neighborhood Councils can maintain account security without relinquishing NC autonomy.

(Item 8.8) The policy dictates that no Neighborhood Council may include endorsement of private entities, including non-profit organizations. This should include an exclusion for announcements related to Neighborhood Purpose Grants. If the NC spends money supporting the work of a non-profit (i.e., recent donations to local food pantries or local schools) stakeholders deserve to know about it.

### **Extra Administrative and Board Work**

The TNC finds many parts of this policy to involve extra, unnecessary work, which is particularly problematic since the neighborhood council is made up of volunteers and administration already takes enough volunteer and meeting time.

While posting of timely and accurate information is always optimal, this policy needlessly legislates that there be a “timely and accurate content review process” conducted by the Neighborhood Council. Codifying this is unnecessary and seems to serve as preparation for yet another extensive paperwork process that must be taken on by the volunteers that make up the Neighborhood Council and that would also then waste valuable meeting time.

(Items 8.1 & 6.3) Finally, the requirement that “all Digital Communications shall originate from the neighborhood council, acting through its board” seems to imply that the Board would need to approve

all social media posts and newsletter and website content. If this were the case, the NC would need to decide whether to substantially detract from board effectiveness and outreach efforts.

### **Policies That Are Contrary to a Good Outreach Strategy**

(Item 6.4) We disagree with Section 6.4 that states councils shall have “as few neighborhood council Digital Communications accounts as possible.” We believe that NCs should be able to decide for themselves how many accounts will best serve their outreach purposes. Since each platform has a specific purpose and specific demographic, adhering to this would limit the outreach capacity of the NC. For example, if TNC wanted to get a TikTok account to try and engage young people, we should presumptively resist the impulse because it would violate this principle? It’s not necessary to provide a consistent level of activity on each platform. If a NC wanted to produce a series of YouTube videos this doesn’t compel them to continue to keep producing YouTube videos in the future at the same rate.

The compulsion to link back to the NC website and its agendas is also contrary to good strategy. Brevity is very important in certain social media communications. While these links are often and obviously an integral part of the communication, they are not always, and trying to fit them in every time would destroy the communications. The requirement that “All neighborhood council Digital Communications must...display neighborhood council contact information” likewise is impractical. A Tiktok video is normally less than 30 seconds. A tweet is a small number of characters. Digital media communications come from accounts, and it’s the account itself that is the contact information. If somebody wants to contact the council, any web search will lead to the ability to do so. To burden all communications with this responsibility is unnecessary.

### **Other Questions/Concerns**

In addition to some of the above concerns and objections, the TNC is also concerned about the following items:

- Item 5.6 – States that *“neighborhood councils shall also create distinct role specific email accounts for shared use by its Account Administrator, Account Moderator and their alternatives.”* We would like more information on how this would apply to other accounts such as the TNC Nextdoor and Facebook Accounts.
- Item 9.1 – states ... *“If individual board members wish to encourage civic engagement through the neighborhood council, they may post a link to the Neighborhood Council Website, and shall, to the greatest extent that a given platform allows, block the ability of any posts and/or comments to avoid any discussion regarding neighborhood council matters.”* We feel this needs further clarification and it appears to be too burdensome. For example, would this allow a TNC board member to post TNC agendas, event flyers, etc. on their personal Nextdoor account?
- Item 10.1 – states... *“comments from the public may be disallowed or disabled on NC Digital Communications, provided they are blocked at all times. In the event that comments are allowed on Neighborhood Council Digital Communications, they must be monitored daily.”* If comments from the public are allowed or enabled, then it has to be monitored daily and include Attachment A. How

would this apply to TNC Facebook and Nextdoor accounts? Additionally, is direct messaging allowed?

- Item 11.2 – Addresses *“If a security breach is suspected to have taken place or is confirmed, the Account Administrator must notify the president or chair of the neighborhood council and the Department immediately, regardless of time of day or day of the week. If necessary the NC Digital Communications account will be suspended or deactivated.”* What does this mean in practice? What are the contact numbers/names ?
- Item 12.1 – States that *“Content on all Neighborhood Council Digital Communications may be subject to disclosure as required by the California Public Records Act (CPRA).”* We need more information about record retention requirements. For example, if the TNC posts timely news items on the website, i.e., information about participating in the Census? Or free mask giveaways, do we need to retain this once the event passes? How far back should Board or Committee Minutes, Agendas and supporting documents go? Where do we retain this information?

### **Conclusion**

The Tarzana Neighborhood Council would support the requirement that we have a digital media policy. This would be an integral part of our standing rules. Procedures and policies, however, should be informed by applicable law and dictated by each Council. **We ask that Neighborhood Councils are an integral part in the development of a policy that works for all of us.**

WHERE AS the proposed Digital Media Policy is a direct overreach in power and scope of limiting the ability of Neighborhood Councils to effectively communicate with their constituency.

BE IT RESOLVED the Tarzana Neighborhood Council rejects the proposed Digital Media Policy.

Best regards,

Tarzana Neighborhood Council

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