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**KIMA-W MEDICAL CENTER**

## **Hoop Valley Tribe**

### **Digital Participation and Social Media Guidelines**

#### **I. INTRODUCTION**

The Hoopa Valley Tribe ("Tribe") seeks to promote the activities and successes of its Tribal entities and employees. We recognize that one of the best platforms available to do this is the use of social media and thus have created these Digital Participation and Social Media Guidelines ("Guidelines") to help understand our most effective ways of achieving this.

These Guidelines are meant to cover all employees of the Hoopa Valley Tribe, including department managers, members of the tribal government, and elected officials.

When used effectively, social media can be our most effective tool. In situations of emergency, marketing, fostering community, and creating community, social media is unmatched in its efficiency. However, the nature of social media opens the Tribe to a variety of liabilities.

#### **II. GENERAL BEST PRACTICES FOR EMPLOYEES**

##### **EXPECTATION**

Employees are expected to be working during work hours. If an employee is engaging with a Tribal department account it is expected to be for the purposes of furthering the best interests or business relationships of the Tribe. It is important to be aware of whether or not the time used for personal social media during the work day is your own time or the Tribal entity's and to correct your behavior as necessary. If personal activities begin to flow into work time, it is first and foremost, the employee's responsibility to correct this behavior. If the behavior is not corrected, supervising officials have the authority to take subsequent action.

It is important to be conscious of how your behavior will be received by others. If your job is public-facing, it can be considered rude to be on your phone and refuse eye contact with your customers or clients. If you are an employee who is expected to participate in meetings, the same is true. It is important for the public, business partners, and community to have trust and confidence in the Tribe and its employees.

##### **BEST PRACTICES**

Be sure you are engaging in social media conversations the right way. Your communications should reflect your area of expertise, particularly if you are communicating with a customer,

## EXAMPLES OF COMMUNICATION THAT MAY BE SUBJECT TO DISCIPLINE:

- 1) Airing strictly personal grievances or complaints solely by and on behalf of the employee's Tribal entity about an individual grievance that is not a matter of common concern for other employees.
- 2) Airing personal grievances or complaints solely by and on behalf of the Tribe or Tribal entity about a matter which is not a matter of public concern. Matters of public concern include matters of political, social, or other concern to the community but do not include personal complaints about internal employee functions or dissatisfaction with employee's management unless such statements bring to light actual or potential wrongdoing or breach of public trust on behalf of the employee or inform the public that the Tribal entity is not fulfilling its duty to the public.
- 3) Making statements that will disrupt the Tribal entity's ability to effectively and efficiently operate and fulfill its duties to the public, such as statements that will cause discord among co-workers or encourage factions among co-workers. (See Hoopa Valley Tribal Code, Title 8- Conflict of Interest).
- 4) Making egregiously unprofessional and offensive statements or communications such as displaying sexually-orientated material; sexual or racial discrimination for harassment based on age, ethnicity, nationality, disability, race, religion, or gender; threats against personal safety; or extreme vulgarity.
- 5) Making statements that are unlawfully slanderous and detrimental to the Tribal entity or the Tribal entity's Board of Directors or Tribal Council. Such statements include comments that are knowingly false or maliciously untrue and which give a false impression about the subject to the public; or sharp, public, disparaging attacks upon the quality of the Tribal entity's business policies in a matter reasonably calculated to harm the company's reputation.
- 6) Revealing the Tribal entity's non-public, private, or confidential information, for example, trade secrets, settlement actions, copyrighted or trademarked information, information necessary to ensure compliance with government regulations and other laws, information about internal investigations if those investigations are designed as confidential by management, or pending reorganizations.

## REPRESENTATION

It is important to understand how and when an individual is holding themselves out as a representative of the Tribe. Please be aware of Hoopa Valley Tribal Code, Title 30- Personnel Policies and Procedures, section 5.4 (e) provides that "[n]o employee shall presume to speak for the Hoopa Valley Tribe to any mass media outlet on any matter concerning the Tribe without the delegated authority to do so, or the express prior written approval of the Tribal Council, or unless

Boards, Committees, and Commissions, are subject to this harassment policy. Through education and enforcement of this policy, the Hoopa Valley Tribal Council will seek to prevent, correct, and discipline behaviors that violate this policy. Violation of this policy will result in disciplinary action, which may include termination of employment. The Tribal Council accepts no liability for harassment of one employee by another. The individual who commits prohibited harassment is personally liable for such actions and their consequences."

Please note, the Hoopa Valley Tribal Code, Title 30- Personnel Policies and Procedures is subject to amendment and these Guidelines recommend following the most recent and up-to-date Hoopa Valley Tribal Code, Title 30- Personnel Policies and Procedures concerning harassment.

## **PRIVACY**

As an employee of the Tribe, you are prohibited from sharing personally identifying information about other employees you work with, or information about customers or clients on social media. You should never post personal information about another person without their permission. For example, if you engage with a customer with a complaint on social media do not include identifying information about the customer (i.e. amount of purchase, purchase number). A best practice includes, if directing that customer to a solution, using employment titles such as "Manager" instead of personal names.

Additionally, please be aware of the privacy of the Tribal entity. Employment with the Tribe may allow an employee to obtain information such as trade secrets, copyrighted information, confidential facts, government documents, or other privileged or protected confidential information. An employee is responsible for the confidentiality of this information on social media, the same way they would be in the workplace.

## **CONFLICTS OF INTEREST**

A conflict of interest exists if one's personal interests interfere with one's duties of employment. More specifically, if you engage in any personal or business-related activity, including a financial interest, that (1) could potentially interfere with your responsibilities or judgment on behalf of your employer or its clients, or (2) conflicts, or appears to conflict in any way, with the interests, or damages the reputation, of the Tribal entity.

Conflicts of interest in social media can present in many forms. The perception of a conflict of interest can be influenced by factors such as how your profile presents to the public, whether or not you are posting about your place of employment, overlap between your personal activity and the subject of your work, or your contacts. In order to avoid repercussions for conflicts of interest, it's best to keep a few things in mind:

An internet troll is a person who posts with the main objective of starting fights or conflicts, usually through comments. You may find that your department, employee or official social media page has become the target of such activity. The following are some helpful suggestions for handling these types of situations:

- 1) If the user has a genuine concern or complaint that you feel you may be able to address, you may consider inviting them to call you at the official business number (do not give out your personal contact information) or suggest a time they can come in and speak to you in person.
- 2) **Remain calm.** The goal of antagonization is to elicit a response. If you find yourself upset, embarrassed or humiliated, do not respond. Wait until you are calm and can think clearly about the situation.
- 3) **Engage in minimal interaction.** A troll has accomplished their goal if they begin filling up your page or feed with numerous back-and-forth comments. This will only draw more attention to the conflict.
- 4) If you have control over the page or platform, use your best judgment as to whether or not the problem can best be solved by deleting the comments, turning off commenting, or blocking the user. If possible, remember to offer an in-person conversation, either by telephone or face to face, before taking this action.
- 5) Report the user if things get out of control. Remember, no one is expected to be the target of discrimination, racism, or hate speech.

## **ELECTED OFFICIALS**

Social Media is one of the best tools for elected officials. It is a highly effective campaign tool, a great way to educate your constituents, spread information about gatherings, organize, raise funding, call attention to important issues, and present yourself as accessible.

As a representative, your actions are always a reflection of the body you govern. As an elected official, your name and image will present the outward appearance of the Tribe overall. The Tribe recognizes that community members will try to reach you with concerns in a variety of ways, including social media.

Many Tribal Council Members choose to operate separate pages to create a divide between their professional lives and personal lives. However, this is not a complete solution to the absence of privacy that exists on social media. It is important to remember that you are always "on the record" and that everything online has the potential to live forever. In the public eye, the lines between public and private begin to blur. Your ability to limit public interaction is much more limited than that of a private citizen and critics are usually the users who are watching you the

These Guidelines are for general information purposes only and is not intended to provide legal advice to any individual or Tribal entity. The Tribe recommends consulting with your legal advisor before taking action based on information appearing in these Guidelines.