



POLICY/PROCEDURE

TITLE		POLICY
City of Mount Vernon Social Media Policy		Exec-001-2022
EFFECTIVE DATE	SUPERSEDES	PAGES
March 20, 2023	300-12-02	12

APPLICABLE TO:

All city employees, elected officials, volunteers, contractors and all other who use these resources on the City’s behalf.

OVERVIEW

The City of Mount Vernon uses various tools to share information and communicate with the public, stakeholders, partners and the media. Social media platforms offer a way to deliver public information and customer service to constituents. The addition of social media tools gives citizens another means to interact with their government. The City encourages the use of social media when it furthers the goals of the City and the missions of its departments when appropriate.

POLICY STATEMENT:

This policy establishes guidelines for the use of social media in the performance of City business. It also provides guidelines for conduct by City employees who use social media to engage with the public on behalf of the City. This policy is not intended to address employee’s personal use of social media sites; refer to the City Employee Handbook, Appendix C “Social Media Policy Employee Usage,” and Appendix B “Computer and Electronic Media Acceptable Use Policy.”

DEFINITIONS

- A. Special Projects Manager (Mayor’s Office): Will be responsible for administering the City’s communication tools including social media sites; and coordinating the communication policies and standards for the City of Mount Vernon.
- B. Confidential Information: Information for which access or disclosure may be assigned some degree of sensitivity, and therefore, for which some degree of protection or access restriction may be warranted.
- C. Social Media: Online technologies, tools and practices that facilitate social interaction, dialogue, emergency notifications and business. Social media can take many different forms including text, images, audio and video. These sites are typically third-party hosted online technologies that facilitate social interaction and dialogue via blogs, message boards, podcasts, wikis, and video logs.
- D. Topic Administrator: Appointed staff from each respective City department responsible for posting, editing, retaining, and monitoring program-specific social media site content.

- E. Information Services Department (I.S.): Manages the City's web technology resources and assets including external websites providing on-going support to the web technology resources to ensure the web services are operational and meet local government best practices.

POLICY

- A. All City departments may use the City's social media tools as outlined in this policy. Social Media is a communication channel for distributing information to the public. It is used in addition to existing communication channels such as City newsletters, website, press releases, official documents, etc. The City encourages the use of social media sites and tools when it furthers the goals and vision of the City and the missions of its departments where appropriate. The use of social media is optional and not required. The most appropriate uses of City social media sites are: (1) for time-sensitive and emergency information; (2) as a communication tool for citizen engagement, promotions and marketing; and (3) as a tool to direct citizens and site users to the City's official website.
- B. Responsibilities: The Special Projects Manager, or designee, is responsible for all social media as outlined in this policy. All questions relating to this policy should be directed to the Special Projects Manager. Employees responsibilities under this policy is as follows:
 - 1. Supervisors: Responsible for assuring their employees understand and comply with the policy.
 - 2. Employees: Responsible for understanding and complying with the policy and will be subject to disciplinary action up to termination depending on the infraction of the policy.
 - 3. Directors: Responsible for the oversight and appropriate use of the social media. Each department director is responsible to enforce this policy in consultation with the Human Resources Director and the Special Projects Manager.
- C. The City may establish and maintain primary citywide social media accounts (sites) for disseminating City information under the direction of the Special Projects Manager. Content for these sites will be provided by City departments.
- D. Public Records and Retention: All information posted, and other activity conducted on social media sites, is subject to the Public Records Act and Office of the Secretary of State Records Management Guidelines and Retention Schedules.
 - 1. All City social media sites shall contain a statement that all content submitted by users is potentially subject to disclosure pursuant to the Public Records Act, Chapter 42.56 RCW. Where appropriate, users and visitors to the City's social media sites should be directed to submit public records requests to the City Clerk.
 - 2. All information and content on a City social media site that is required to be retained under state and local retention policies and guidelines shall be maintained for the required retention period on a City server in a format that preserves the metadata of the original record. Prior approval of the retention

format and procedures for each City social media tool being used shall be received from the City Clerk. See the Procedures below, for additional procedures related to retention of information and content of social media sites.

- E. All laws governing copyright and fair use, or fair dealing, of copyrighted material owned by others, including City of Mount Vernon's own copyrights and brands, shall be followed on social media sites.
- F. Employees not authorized to use social media tools are not allowed to publish or comment as a representative of the City via social media. All employee uses of social media shall follow the ethical standards required by the City of Mount Vernon.
- G. Employees are expressly forbidden to misuse any social media access privileges in any way. This may include, but is not limited to:
 - 1. Using social media accounts for unlawful activities, including violations of copyright law, or for activities that are malicious or have the effect of harassing other users;
 - 2. Misrepresenting the City's programs or policies in their communications;
 - 3. Publishing confidential information. Examples of confidential information may include unpublished details about projects, private customer data, protected health information, unreleased bid or financial information, private personnel information and other sensitive or classified information. Determination of confidential-natured content is the responsibility of the site topic administrator and their department director; and
 - 4. Any use that is inconsistent with Procedure F.2. below.
- H. Open Public Meetings Act: City Council Members, Commissioners and Board Members should not comment, or otherwise communicate, on the City's social media sites unless the form of communication is approved by the Special Projects Manager (such as a newsletter article). Participating in online discussions may constitute a meeting under the Open Public Meetings Act in some situations. The Special Projects Manager or a Topic Administrator may post secondary copies of materials developed by Council Members, Commissioners, or Board Members.
- I. Prohibited Use of Public Facilities or Public Office: City officials and employees are prohibited from using or authorize the use of any of the City's social media sites directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition unless an exemption applies under state law. RCW 42.17A.555. Content includes but is not limited to posts when done for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition is not allowed. In the event there are questions regarding this restriction, employees shall contact the Special Project Administrator for a decision to approve or remove content. The Washington State Public Disclose Commission may be contacted by the appropriate official with questions in advance of a proposed activity that may involve the use of the City's Social Media Sites.

PROCEDURE

- A. The Special Projects Manager will:
1. Oversee and confirm decisions regarding social media sites including authorization of sites;
 2. Evaluate requests for usage;
 3. Have final authority to edit or remove content within the legal constraints per the public records requirements and this policy; and
 4. Verify staff being authorized to use social media tools.
- B. The Information Services Department will:
1. Oversee department social media sites for account set-up and to assure compliance with applicable brand standards maintenance, monitoring, and records management requirements;
 2. Maintain a master list of all approved social media tools and websites;
 3. Develop and maintain a web page on the City website that lists all authorized social activity;
 4. Maintain a list of City social media accounts, associated pages that are operating, URLs, associated records retentions locations, account logins and passwords, and authorized agent contact information; and
 5. Ensure that account security is maintained if authorized agent is removed as an administrator.
- C. Topic Administrators will:
1. Maintain program-specific sites;
 2. Assure regular posting of information;
 3. Monitor comments;
 4. Remove prohibited content; and
 5. Save content required under records retention schedule guidelines.
- D. A link to the City's official website shall be included on all Social Media sites to properly identify the social media tool as an official city resource, directing users back to the City of Mount Vernon website for in-depth information on the posted content. A link or links may also be provided to a department or program specific website resources.
- E. Retention of Posted Information.
1. Information posted on the City's social media sites is subject to the Public Records Act and Office of the Secretary of State Records Management Guidelines and Retention Schedules. In order to ensure appropriate retention of public records, content posted by City personnel on City social media sites should not be original source content (content that has not been created anywhere else and only exists on the social media site), but rather a secondary

copy of information that is posted on the City website or contained in an electronic copy or a hard copy. If original content is posted on a social media site, that information shall be retained in accordance with the City's records retention policies and other applicable laws, for at least the minimum retention period listed for those records beginning the date of posting. Copies of records the City already retains elsewhere will be considered secondary copies and shall be retained accordingly.

2. Department staff are responsible for ensuring retention of the original-source content in an organized, searchable electronic format. The records should be retained in such a manner that it can be deleted after meeting the required retention periods per the Secretary of State's Records Retention Schedule [https://www2.sos.wa.gov/assets/archives/recordsmanagement/local-government-common-records-retention-schedule-core-v.4.2-\(august-2021\).pdf](https://www2.sos.wa.gov/assets/archives/recordsmanagement/local-government-common-records-retention-schedule-core-v.4.2-(august-2021).pdf).
3. All edits made to posted content and comments posted by outside users on City social media sites, including those that are inappropriate and removed by staff, shall be retained as outlined by the governance for each social media tool. When staff edits their posted content or removes inappropriate content, a record of that staff name, date, and time the content was edited or removed shall be retained in an organized, searchable electronic format. The records should be retained in such a manner that it can be deleted after meeting the required retention periods.
4. Any information scheduled to be deleted that is the subject to a pending records request or a request to preserve from the City's legal counsel shall not be deleted until permission is given by the appropriate City Official.

F. Information Posted by Outside Individuals.

1. For all City social media sites that allow user-generated content (non city-published content), those sites are limited public forums, moderated by City of Mount Vernon staff to ensure content posted by outside users is appropriate. A Comment Policy Notice (Attachment 1, Section D) shall be displayed or linked to on all social media sites in a manner that is clearly conspicuous to a user that allow user-generated material to be posted, indicating the site is moderated and inappropriate content will be removed. The City's Social Media Policy shall be linked to the notice.
2. Inappropriate and prohibited content subject to immediate removal from the site includes content that:
 - a. Violates the social media tool's terms of use;
 - b. Is not topically related to the particular content being commented upon;
 - c. Promotes or advertises commercial services, entities or products;
 - d. Supports or opposes any political candidate to any office or any ballot propositions. Such content may constitute a violation of state campaign laws.

- e. Is obscene, profane or vulgar;
 - f. Discusses, encourages or constitutes illegal activity;
 - g. Promotes, fosters or perpetuates discrimination on the basis of creed, color, age, religion, gender, marital status, socioeconomic status, national origin, physical or mental disability or sexual orientation;
 - h. Provides information that compromises the safety or security of the public or public systems, or includes threatening, harassing, or personal attacks against any individual or entity; and/or
 - i. Violates a legal ownership.
3. Inappropriate content shall be retained as required under the Public Records Act and records retention requirements by the designated Topic Administrator and then removed immediately.
 4. Comments and other material from children under the age of thirteen cannot be posted on the City's social media sites, in order to comply with the Children's Online Privacy Protection Act. By posting on a City social media site, users represent and acknowledge that they are at least thirteen years old. Children that are age twelve and younger may e-mail the City with information or comments.

G. Establishing Department or Program-Specific Sites.

1. Departments may establish independent social media sites with the approval of the Special Projects Manager. Departments wishing to create a social media site will make application (Attachment 2) to the Special Projects Manager.
2. Once approval is received, the department shall work with the Information Services Department to create new accounts, establish site pages and records retention locations. The social media site format and guidelines shall be approved by the Information Services Department.
3. Independent department sites shall have a specific staff member(s) appointed by the Department Director to be responsible for management, maintenance, and monitoring of each social media account the department creates. The appointed employee shall regularly monitor, update, and keep public records of the social media site(s) maintained by their department. Directors are responsible for ensuring their staff follows the procedures set forth in this policy and subsequent (or related) operating procedures and policies that govern their use. Departments shall inform the Special Projects Manager if they intend to stop operating their social media account(s).
4. The appointed staff member(s) is responsible for identifying and forwarding public record requests to the City Clerk's office according to City of Mount Vernon and Washington State public record request requirements.
5. Topic Administrators shall maintain accurate information on social media sites by

frequently reviewing and updating as necessary and appropriate and in compliance with this policy.