



POLICY & PROCEDURE

Subject: Social Media Policy			Index: Executive Services Department Number: 100-03	
Effective Date: May 1, 2024	Supersedes: n/a	Page: 1 of 17	Staff Contact: Kristi Rowland, DCAO	Approved By: 

1.0 **PURPOSE:**

The City of Renton is committed to providing communications efforts to constituents across multiple platforms, including social media outlets. Public expectation, frequency of use, current and emerging technology, and the rapid growth of social media usage in other local, state, and federal government entities all underline the ability of social media to enhance communications and engagement between municipal government and the wide audience the city serves.

Social networking within government serves two main purposes: a. to communicate and deliver information to the public on government matters; b. and, in a limited public forum, to facilitate constituent involvement, interaction, and feedback on specific issues as they pertain to city business.

This Policy is adopted to provide guidance and information both to the public and for the city's use of social media, including, but not limited to, web and mobile cell phone applications, blogs, photo and video sharing sites, micro-blogging, social networking sites and wikis. This policy is not intended to address any one particular form of social media; rather social media in general, as advances in technology will occur and new tools for sharing information will emerge.

While the city's website (www.rentonwa.gov) is the city's primary Internet presence, the city recognizes that, when used appropriately, social media may be useful in furthering the goals of the city and the missions of departments in informing and interacting with the public.

Other laws, ordinances and policies may also apply to the use of social media and this policy should not be interpreted to conflict with any of those laws, ordinances and policies, including requirements under the Americans with Disabilities Act.

2.0 **ORGANIZATIONS AFFECTED:**

This Policy applies to all city **Officers, Employees** and **Agents** when working with **Social Media** tools on behalf of the city and applies to **Social Media** sites as addressed in this Policy. (All departments / divisions.)

3.0 **REFERENCES:**

3.1 Agents -- all city representatives, including its employees, volunteers, and other agents of the city, including without limitation, independent contractors and anyone acting on behalf of, appearing to act on behalf of, or in the name of the city.

3.2 City Social Media Sites/Accounts – Those pages, sections, or posting locations in social media websites established, managed, or maintained by an employee or officer of the city authorized to do so as part of the Employee's or Officer's duties.

- 3.3 **Content** - any posts, writings, material, documents, photographs, graphics, or other information that is created, posted, shared, distributed, or transmitted via social media.
- 3.4 **Custodian** -The City Clerk is responsible for ensuring that all city records, including social media content, are maintained by the city and organized so that they can be produced as required by the Public Records Act and are properly preserved or disposed of in accordance with applicable retention schedules.
- 3.5 **Digital Identity** – Information about a user of a social media site that differentiates that user from others.
- 3.6 **Employees** -- all city representatives and anyone employed by the city.
- 3.7 **Social Media** – internet and mobile-based applications, websites and functions, other than email with a focus on immediacy, interactivity, user participation, and information sharing. These venues include social networking sites, forums, weblogs (blogs, vlogs, microblogs), online chat sites, and video/photo posting sites or any other such similar output or format. Current examples include Facebook, Instagram, Twitter, YouTube and this policy includes emerging new web-based platforms generally regarded as social media or having many of the same functions as those listed.
- 3.8 **Social Media Account** - any account established on Social Media.
- 3.9 **Social Media Administrator** – The city employee or employees expressly designated by the Communications Director to monitor, manage, supervise or control the city social media sites as provided in this Policy.

4.0 **POLICY:**

4.1 **ADMINISTRATIVE ROLES AND RESPONSIBILITIES**

- 4.1.1 **Social Media Administrator.** The *Communications and Engagement Division* is responsible for implementing this policy and leading the city’s social media efforts for official city business. The *Communications and Engagement Director* shall serve as the *Social Media Administrator* of the city, assisted by the *Digital Communications Specialist* or other designee.
- 4.1.2 **The City of Renton’s Official Social Media Account.** The *Social Media Administrator* is responsible for developing and administering the city’s presence on a *Social Media Account* that is the city’s official social media account or site. The *Social Media Administrator* and employees of the *Communications Division* shall review, monitor, and enforce all approved *Social Media Accounts* and sites.
- 4.1.3 **Departmental-Specific Social Media Accounts.** A Department may seek to develop its own departmental *Social Media Account* specific to the needs of the Department. On a case-by-case basis, the *Social Media Administrator* must review and approve or deny all requests for developing a Department’s own *Social Media Account*, as provided in Section 5 “The city official social media site and other specific social media sites/accounts.” Final approval will be at the discretion of the *Communications and Engagement Director*.

4.1.4 Existing Social Media Account/Platform. The *Social Media Administrator* must review existing departmental social media sites or tools that have already been established as of the effective date of this Policy to ensure that they follow this Policy. Within 60 days of the effective date of this Policy, the *Digital Communications Specialist* must recommend approval or denial of the site or tool to the *Communications and Engagement Director*. Each department shall review the department's *Social Media* site or tools and submit a written request for approval of such sites to the *Communications and Engagement Director*. In the event the request is denied, the site or tool must be immediately taken down and its use discontinued as provided in Section 4.10 Deactivating a Social Media Account.)

4.1.5 Additional duties of the Social Media Administrator. (or the Departmental Social Media Administrator, as applicable). The *Social Media Administrator* shall:

- Ensure the city's official *Social Media Account* is implemented and regularly maintained and kept current. (*Option: If department social media administrator add: "Department Social Media Administrators shall ensure that the department's social media sites/accounts/platforms are regularly maintained and kept current."*)
- Review information posted to the department's *Social Media* sites by city employees or agents to ensure the *Content* is appropriate, professional, and consistent with the city's policies and the purpose for which the site exists. Frequent review of sites that provide opportunity for comment or other interaction is essential. The *Social Media Administrator* must establish a schedule for the regular review of each site and submit the schedule for review and approval of the department director.
- The Department *Social Media Administrator* shall keep the *Department Administrator* and *Communications and Engagement Director* informed of the department's social networking tools and activities.
- Communicate regularly with the *Custodian* of public records to ensure that the *city social media site* complies with any applicable public records laws.
- Establish a process to ensure that this Policy is broadly disseminated and that all *employees* are aware of and confirm their understanding of this policy.

4.2 STANDARDS OF CONDUCT. City employees are responsible for ensuring that all use and contributions to the content of city social media sites adhere to the standards of conduct and requirements as outlined in this Policy and that their personal use adheres to the standards of conduct as regulated by this Policy. Any employee, agent, or official who is authorized to edit, post or alter *content* of a *city social media site* must agree in writing to comply with any training or other requirements, policies or restrictions and have on file in the office of the *Social Media Administrator* such written agreement before editing, posting or altering *content* on a *City Social Media Site*. Similarly, *employees* and *agents* are prohibited from disclosing confidential information except under policies and regulations that address disclosure of that information. For example, Public Records Acts, Freedom of Information Acts, and Public Information Acts generally provide for the disclosure of public records but prohibit disclosure of exempt or confidential information. Specific limitations are found in Section 4.6.12 Intellectual Property Rights and Confidential Information of this Policy.

4.3 POLICY ENFORCEMENT. The *Social Media Administrator* will be the coordinating authority for review and monitoring and enforcement of any approved *City Social Media Sites*. The *Deputy Chief Administrative Officer* shall be the final decision-making authority for the approval or denial of any *Social Media Sites* and the use of such Sites by the City

4.4 THE CITY OFFICIAL SOCIAL MEDIA SITE AND OTHER SPECIFIC SOCIAL MEDIA SITES

4.4.1 Official Social Presence. The official city social media site is the primary tier of the city's *social media* presence. This tier includes any official city presence on a *social media site*. City *employees* and departments are encouraged to contribute *content* and ideas to this site by contacting the *Communications and Engagement Division*.

4.4.2 Department-Specific Social Media. A Department may seek to develop its own site, account or platform specific to its needs. Department-specific **social media sites should be focused and limited in scope and topic and** should complement rather than supplant the official *city social media site* or existing web resources. General departmental pages and associated *content* should be included and managed within the current *city social media site*. On a case-by-case basis the *Social Media Administrator* must review and approve or deny all requests for developing additional *city social media sites/accounts/platforms*, as follows:

The department shall submit a request in writing on a form provided by the *Social Media Administrator*. The request shall state:

- i. how or in what respect there is a clear benefit of specific stakeholder outreach that is not already met by the *City social media site*;
- ii. how the department has developed an effective strategy to develop and maintain the site/account/platform; and
- iii. how the content contained on the *Department social media site* will be captured and retained in accordance with Public Records Act guidelines.

The *Social Media Administrator* will be the coordinating authority for review and monitoring and enforcement of any approved *city social media sites*. Administrator access to the account shall be granted to the *Social Media Administrator*. The *Deputy Chief Administrative Officer* shall be the final decision-making authority for the approval or denial of any *social media sites* and the use of such sites by the city.

4.5 STANDARDS AND BEST PRACTICES OF CITY SOCIAL MEDIA SITES

4.5.1 The *Social Media Administrator* shall develop and provide detailed best practices guidance for the *city social media sites*, accounts and platforms. The following general standards apply to all *city social media sites*, accounts and platforms including departmental, committee, board, agency or committee sites.

4.5.2 Limited Public Forum. Unless otherwise specifically noted, when the city establishes a city website or social media account it does so to communicate to the public, to inform and relay official city content. The city therefore regulates the *city social media sites* that it maintains for the following reasons:

- i. Posts on *city social media sites* appear to carry the approval of the city and unauthorized posts on those sites can confuse people as to whether the city endorses the post or if a specific post forms a position of the city and whether it is the city's official position;
- ii. *City social media sites* unless expressly noted, are not intended to operate as a traditional open public forum as there are ample open forums for purposes of expressing opinions and views. Social media and internet sites are many and varied and offer an ever-expanding opportunity for expression over a multitude of platforms, in many different languages and countries all of which can be easily accessed through internet searches.

4.5.3 Right to Remove Posts that Do Not Comply with the Rules of the Limited Public Forum. When the *city social media site* has not been opened as a traditional public forum or where the *city social media site* has been opened as "non-public" and "limited public" forums, the *social media administrator* is authorized to remove unauthorized Content or links posted on *city social media sites* that do not conform with the requirements of this Policy in a viewpoint-neutral manner. Under no circumstances should this policy be interpreted to allow censorship based on viewpoint; a post or comment that complies with the rules of a limited public forum cannot be censored based on the views expressed.

4.5.4 Required Disclosures. A clear statement of the intent, purpose and subject matter of a site, as well as a statement clearly articulating whether the site accepts comments and if so, any restrictions that might affect the nature of the forum as either limited or traditional. The site should prominently disclose that all *content* posted to the site are subject to public disclosure laws.

Any other disclaimer or notice should be clearly posted on *city social media sites*. The following statements must be included on each *city social media site* following the city's description of the purpose of that social media site or tool and a user assents by use to the rules of the forum and the conditions established for its use as established in this Required Notice as described:

CITY OF RENTON SOCIAL MEDIA POSTING & COMMENTING POLICY

The following policy shall govern all posts and comments by public visitors to all City of Renton Social Media sites:

PRIVACY POLICY AND DISCLAIMER

Any individual accessing, browsing, and using a City of Renton social media site as a visitor unequivocally accepts the social media policies (hereafter "Policies") set forth in this document.

The City of Renton maintains the right to modify these Policies. Any modification is effective immediately upon posting the modification on the social media policy page unless otherwise stated. Continued use of a City of Renton social media site following the posting of any modification signifies acceptance of such modification.

All users of a City of Renton social media site are also subject to the site's own Privacy Policy. City of Renton has no control over a third-party site's privacy policy or their modifications to it.

All content of this site and all comments submitted to this page are public and are subject to disclosure pursuant to the state's Public Records Act. Please be aware that anything you post may survive deletion whether by you or others.

- Requests for emergency services should be directed to 9-1-1 not through this site.
- Individual complaints, concerns, or service requests will not be addressed via social media unless the city specifically identifies the site for that purpose.
- To protect your privacy and the privacy of others, please do not include sensitive personally identifiable information, such as social security numbers. The city-hosted tools and websites should not be considered secure.
- If you have specific questions regarding a city activity or program that involves details you do not wish to share publicly, please contact the Communications Division, with contact details listed at www.rentonwa.gov.
- Posts to this site may be removed in a viewpoint-neutral manner under the city's Policy for *city social media sites* if allowed by law and under this policy Section 6.1.2 (Right to Remove Posts that Do Not Comply with the Rules of the Limited Public Forum) and Section 6.20 (Removing Content, Posts or Comments of the Public) subject to the right of appeal under Section 8.6 (Right to Appeal Removal of Content or Application of this Policy to the Public) but may be preserved as a public record.

All posts and comments uploaded to City of Renton social media sites that allow posts will be periodically reviewed.

The city also reserves the right to discontinue any or all *city social Media Sites* at any time.

Practical and legal considerations may sometimes constrain, prevent, or prohibit discussion by the city of certain topics, including, but not limited to litigation, pending investigations, and other topics through various media including social media.

Following or “friending” persons or organizations is not an endorsement by the city and is only intended as a means of communication.

Any references or links to a specific entity, product, service or organization posted by individuals on the *city social media sites* should not be considered an endorsement by the city or its departments or *employees*.

The city does not review, sponsor, or endorse any other website(s) linked to its website or to *city social media sites*. The views and opinions of authors expressed on those websites do not necessarily state or reflect the opinion of the city and may not be quoted or reproduced for the purpose of stating or implying any endorsement or approval of any product, person, or service by the city or its *employees* or *agents*.

The city is not responsible for *content* that appears on external links.

The city is not responsible for and does not guarantee the authenticity, accuracy, appropriateness or security of any link, external website or its *content*.

Investors determining whether to invest or continue to invest in the city’s debt offerings should not rely on information posted on the site in making their decisions to invest or not to invest; information regarding the city’s financial position is posted at www.rentonwa.gov

Any questions should be directed to the *Social Media Administrator* at communications@rentonwa.gov.

4.5.5 Solicitation of Public Comment – limited public forum. Where comments are solicited or invited on the site the following statement must be included:

“The purpose of this site is to discuss matters of public interest in and to the City of Renton as identified and raised by the city for discussion. We encourage you to submit comments that are on topic, but please address your comments to the specific topic(s) discussed. This is a forum limited to the specific topics identified and raised by the city.”

Users who submit Content to this city social media site agree they have read, understand, and agree to the following terms and conditions by virtue of such use:

Terms of Use

1. I am submitting content voluntarily and on my own behalf.
2. The content I post reflects my own original thoughts or work.
3. I understand that the city has the right to re-post or share any content, photos or videos that I submit on this or other city social media sites.
4. I have read and understand the Policy, including the right of the city to remove, or archive content as described in the city's policy and as may be allowed by law.
5. I understand that any content I provide may be considered a "public record" under state law.
6. I understand and agree that unless specifically identified as a resource for receiving requests for information under the state public information laws, city social media sites are not proper vehicles for making requests for public information or public records under state law and any such requests must be made to the appropriate custodian of the records.
7. I understand and agree that my and others' comments are subject archiving and that my comments and others' comments are subject to removal in whole or in part from this site if my or their comments contain:
 - a. comments not directly on the topic raised for discussion,
 - b. obscene, indecent, or profane language, or pornographic images
 - c. direct threats,
 - d. content that promotes discrimination on the basis of race, color, creed, sex, sexual orientation, national origin, ethnicity, age, disability, or gender identity,
 - e. the solicitation, promotion or endorsement of specific commercial services, products or entities,
 - f. links to any site or content posted by automatic software programs (i.e. "bots"),
 - g. the promotion or encouragement of illegal activity, personally identifiable information or sensitive personal information that if released violates federal or state law,
 - h. The promotion or endorsement of a political campaign or candidate,
 - i. information that compromises the public safety or security of the public or security systems,
 - j. Information that directly interferes or compromises ongoing investigations, public safety tactics, or the safety of public safety officers,
 - k. Confidential or exempt information in violation of state or federal law, or
 - l. Appear to violate the intellectual property right of the city or a third party under federal or state law.

I also understand that the views and comments expressed on this site only reflect those of the comment's author, and do not necessarily reflect the official views of the city, its selected and appointed officers and employees or its departments and agencies.

8. Waiver of Liability. Because various laws exist that create liability for various actions, including but without limitation defamation, invasion of privacy, false light, breach of contract, procurement violations, violations of due process among many potential areas of exposure for which the city accepts no responsibility based on the actions of others or for creating this social media site, I, for myself, successors and assigns, release and hold harmless and agree to indemnify the city, including its officers and

employees, from any and all actions, claims, liabilities and damages of whatever kind and nature arising out of or in connection with my use of the city social media site/account.

By posting or commenting I acknowledge that I understand and accept these terms of use.

- 4.5.6 Archiving Content.** The city will archive content in accordance with the Public Records Law. Any content that is removed may also be considered “public records” and will be archived as required by law to the extent possible using then current reasonable options.
- 4.5.7 City and Departmental logo.** Departments may use a departmental logo in their social media Site/account. Where appropriate for a particular site, social media pages will include the City of Renton’s logo. Page names should be descriptive of the department/division using the site.
- 4.5.8 Restricted Access Platforms.** City departments may only create restricted access sites or subsites for internal use (i.e., for use to allow *employees* to communicate among themselves) and only after approval by the city *Social Media Administrator*. When using platforms that limit access, the *Social Media Administrator* must identify an appropriate platform for use and establish the guidelines for access and monitor access for compliance.
- 4.5.9 Biographies used on City Social Media Sites.** Departmental accounts that require biographies or other user-specific information will read “City of Renton, Department name” and contain a link to the department’s website. Where possible, departmental usernames should begin with “City of Renton.”
- 4.5.10 Identification.** All *city social media sites* must clearly indicate that the social media site that is maintained by the city and must have appropriate city contact information prominently displayed.
- 4.5.11 Links.** Links placed on *city social media sites* should only link to a resource on the city’s website at www.rentonwa.gov, or a city-owned website, a state, federal or local government site, an educational website (.edu) or an organization with an official partnership or supportive business relationship with a city department or program, such as IMLA at www.imla.org.
- 4.5.12 Design.** Design elements (logos and descriptive text for logos, background, images) should be appropriate to the subject matter and consistent with the City of Renton’s design guidelines, which are available from the *Communications and Branding Guide*.
- 4.5.13 Intellectual Property Rights and Confidential Information.** Information that is proprietary, copyrighted or any other intellectual property, attorney-client privileged, or information subject to state or federal privacy laws, and information not subject to disclosure under the Washington Public Records Act (“confidential information”) must not be posted on *city social media sites*. Any questions concerning this standard should be directed to the *Social Media*

Administrator and City Attorney. An owner of copyrighted material or other intellectual property who believes the owner's rights are infringed must promptly notify the *Social Media Administrator*. The *Social Media Administrator* must take appropriate action upon notification.

4.5.14 Data Tracking. Most social media sites offer some mechanism for capturing data or tracking user trends and activity. It is the responsibility of the *Social Media Administrators* to use these applications to ensure the most effective use of social media outlets.

4.5.15 References, Links and Embedded Content.

- i. Any references or links to a specific entity, product, service or organization posted by individuals on the *city social media sites* must not be considered an endorsement by the city or its departments or employees.
- ii. The city should not sponsor or endorse any other website(s) linked to its website or to *city social media sites*. The views and opinions of authors expressed on those websites do not necessarily state or reflect the opinion of the City of Renton and may not be quoted or reproduced for the purpose of stating or implying any endorsement or approval of any product, person, or service by the city or its employees or agents.
- iii. The city is not responsible for Content that appears on external links.
- iv. The city is not responsible for and does not guarantee the authenticity, accuracy, appropriateness or security of any link, external website or its *content*.
- v. The city reserves the right to and may delete links and embedded *content* that violate the city's social media policy.

4.5.16 Security and Privacy Risks. Applications (such as streaming video, music, photos, and subscriptions to RSS feeds) that may be useful to a *city social media site's* mission can cause clutter and security risks. An application should only be used to serve a city purpose and add to the user experience, and only if it comes from a trusted source and has gone through the approval process outlined in this Policy. An application may be removed at any time if it causes a security breach or contains or is suspected of containing a virus without notice. Where social media sites are hosted by third parties, they are governed by those parties' privacy policies. Additionally, the *city social media sites* are governed by federal, state, and other laws that establish privacy rights.

4.6 Employee Requirements for the City's Social Media Sites

- 4.6.1 City-Issued Email Accounts.** Employees responsible for setting up or maintaining city social media sites must use their city-issued email accounts in order to conduct municipal social media operations in a manner that is cybersecurity prudent and more password secure. By operating social media platforms using only public emails, the city's IT Division is able to better control accounts in the event that a rapid change must be made.
- 4.6.2 Usernames.** *Social Media Administrators* and employees authorized as part of their official duties to post information, make comments, and send messages to the public on a department's social media site must set up the account using the city /department name where a user creates a business account in the user's name to facilitate transparency in communications. Accounts established under this provision are city-owned accounts and belong to the city.
- 4.6.3 Username Guidelines for Business Accounts.** A platform requiring a user to create a business account in the user's name established by an employee under this policy must:
- 4.6.4 No Expectation of Privacy.** There is no reasonable expectation of privacy associated with the administration of a *city social media site* or an account established under this policy.
- 4.6.5 Records Retention.** All social media interaction involving a *city social media site* or account may be subject to relevant records retention law and open records statutes.
- 4.6.6 Transition of Employee Role.** Upon employee termination, retirement, or other form of separation from employer or change in job duties, account ownership remains the city's and the employee must take all necessary steps to protect the city's interest in the site or account.
- 4.6.7 Approval for Restricted Access Platforms.** Administrators and city employees must not form groups/pages that are private or closed to the public under Section 6.6 (*Restricted Access Platforms*) without the express approval of the *Deputy Chief Administrative Officer* and *Social Media Administrator*. It is important to note that in the event that such a group is created, it may be subject to records retention, open records statutes and other applicable law.
- 4.6.8 Guidelines for Employees.** *Employees* using *city social media sites* in their official capacity, in the scope of their employment or while on duty, whether as an administrator or as a responder to a posting, must follow these guidelines:

- i. Unless posting or responding as the site administrator, *employees* must be clear about his/her role in regards to the subject and the extent of the employee's authority to speak for the city.
- ii. Write and post about his/her area of expertise, especially as related to the city and daily assignment(s). When writing about a topic for which an *employee* is not the city's expert, make this clear to readers.
- iii. Keep postings factual and accurate. If a mistake is made, admit to it and post a correction as soon as possible.
- iv. Reply to comments in a timely manner, when a response is appropriate. When disagreeing with others' opinions or providing comments, be sure the comments are meaningful, respectful, and relevant to the topic.
- v. Understand that postings are widely accessible, not retractable, and retained or referenced for a long period of time, so consider content carefully.
- vi. Ensure comments do not violate the city's privacy, confidentiality, and applicable legal guidelines for external communication. Never comment on anything related to legal matters, litigation or any parties with whom the city may be in litigation without the specific approval of the law department.
- vii. Refrain from expressing personal opinions or positions regarding policies, programs, or practices of other public agencies, political organizations, private companies, or non-profit groups.

4.6.9 Acknowledgment. All *employees* must sign a written acknowledgement that they have received, read, understand and agree to comply with this Policy.

4.6.10 Privacy. All users of *city social media sites* are subject to the site's own privacy policy as well as privacy laws applicable to the city. The city has no control over third parties' privacy policies or modifications to such policies.

4.6.11 Data Ownership and Copyright Policy. The city retains the rights to all text, photographs, graphics of any kind and other *content* found on *city social media sites* that was produced by the city. All social media communications or messages composed, sent, or received on city equipment in an official capacity are the property of the city. The city maintains the sole property rights to any image, video or audio captured while a city *employee* is representing the city in any capacity even if disseminated over *city social media sites* whether the dissemination is authorized or unauthorized unless a release of those property rights has been specifically granted.

- 4.6.12 Use of City Seal or Logo.** Any use of the city seal or logo is prohibited without the express written permission of the city.
- 4.6.13 Third Party Copyright or other Intellectual Property Interest.** *Content* that violates a legal ownership interest of any party or copyright or other intellectual property should not be posted or submitted in any form without permission of the holder of those rights. Any person redistributing *content* subject to a third-party copyright or other intellectual property via the *city social media sites* must adhere to the terms and conditions of the third-party intellectual property or copyright holder and upon request of the holder of the copyright or owner of other intellectual property such *content* may be removed from the site.
- 4.6.14 Removing Content, Posts or Comments of the Public.** When the city determines to remove *content* of a person who is not an *employee* and who was not acting on behalf of the city, the *Social Media Administrator* must endeavor to contact the person promptly to notify them of the action. The person may appeal the decision under Section 8.6 *Right to Appeal Removal of Content or Application of this Policy to the Public* of this Policy. When *content* is removed because it is a potential security breach or may contain a virus, the notice under this Section is not required, but the person responsible for the post may appeal the decision under Section 8.6 *Right to Appeal Removal of Content or Application of this Policy to the Public*.

4.7 RECORDS RETENTION, PUBLIC RECORDS AND OPEN MEETINGS

- 4.7.1 Public Records and Records Retention.** *Custodian* must ensure that *city social media sites* meet the requirements of law regarding record retention, disposal and retention schedules. Departments maintaining *city social media sites* or using social media tools must preserve records as required by law for the required retention period in a format that preserves the integrity of the original record and is easily accessible. Further, the *Social Media Administrator*, or any *employee* may only destroy, transfer, or otherwise dispose of records in accordance with records disposition schedules.
- 4.7.2 Open Records.** State law governs whether *content* in *city social media sites*, including a list of subscribers and posted communications, is a public record. The *Social Media Administrator*, or the appropriate department, board, commission or committee of the city maintaining the account or site is responsible for working with the *Custodian* in responding completely and accurately under the requirements of State law to any public information requests for information on social media. *City social media sites* must offer notice to users that their use of *city social media sites* may be subject to public information requests and that their identifying information and posts to *city social media sites* to the extent required by law must be disclosed. An *employee* who removes, deletes or redacts *content* from social media may be destroying a public record if such record is not properly archived and made available for public inspection.

4.7.3 Open Meetings and Public Business. State law governs whether communications must be discussed in an open meeting or constitutes a meeting. Communications about public business may come under the state Open Meetings law. *Employees* and members of any council, board, committee, commission or agency must comply with state law and must not use *city social media sites* to discuss matters that can only be discussed in an open meeting under the state law regulating Open Meetings. A member of a public body such as a board member who “likes,” comments, shares, tweets, or otherwise engages in another board member’s *content* on social media may be communicating city business and the state law may apply.

4.8 LIMITATION ON LIABILITY OF CITY

4.8.1 The city strives to post accurate and relevant *content* but does not guarantee the accuracy of any information posted on *city social media sites* and assumes no liability for damages resulting from reliance on any inaccuracies.

4.8.2 The city does not warrant that *city social media sites* will be uninterrupted, permanent or error-free.

4.8.3 The *city social media sites* should not be considered by investors determining whether to invest or continue to invest in the city’s debt offerings; information regarding the city’s financial position is posted at www.rentonwa.gov/finance.

4.8.4 *City social media sites* are not intended to operate as traditional open public forums. When the city opens the site for public comment it does not intend to open the site for any and all purposes but to open the site for limited discussion of only those topics specified by the city on that site. In some instances, sites may be non-public forums, that is, not open to public comment at all, and in other instances, sites may be designated limited public forums and their purpose is only to advance the business purposes of the city on those specific topics.

4.8.5 Right to Appeal Removal of Content or Application of this Policy to the Public.

4.8.5.1 Post Removal Reconsideration. When a post or comment has been removed, anyone aggrieved, other than an *employee* as provided in 8.6.3 below, may seek to have the *Social Media Administrator* reconsider the decision to edit or remove a comment by providing the *Social Media Administrator* with a written request stating the reason or reasons why the comments do not fall within those limitations established in this policy or offer other bases to establish a right to publish the comments or other communications on the *city social media site*. The *Social Media Administrator* or other appropriate official shall strive to render a written decision on the

request within one business day (excluding official city holidays) of receipt of the request noting the basis for the decision. The decision of the *Social Media Administrator* or other appropriate official shall be the final administrative decision of the city.

4.8.5.2 When a person other than an *employee* as provided in 8.6.3 below believes this policy violates their rights in ways other than set out in 8.6.1, that person may seek to have the *Social Media Administrator* review all or part of the policy as applicable to that person by providing the *Social Media Administrator* with a written request stating the reason or reasons why the policy violates the person's rights. The *Social Media Administrator* shall strive to render a written decision on the request within 5 business days (excluding official city holidays) and give the bases for the decision. For good cause, the *Social Media Administrator* may extend the time for rendering a decision to the extent reasonably necessary. The decision of the *Social Media Administrator* shall be the final administrative decision of the city.

4.8.5.3 The rights to appeal created in this Section do not apply to an *employee* when the *employee* is acting in an official capacity or as a representative of the city and may only apply when the *employee* is acting in the *employee's* personal capacity as a private party and when exercising the rights accorded a person under the Constitution and the laws of the United States. An *employee* who feels aggrieved by any action under this Policy not covered by this Section should seek review through established grievance procedures, if applicable, or through the *employee's* chain of command.

4.9 TRANSFERRING OWNERSHIP, ADMINISTRATIVE RIGHTS AND RESPONSIBILITIES FOR A SOCIAL MEDIA SITE ACCOUNT

When the *Social Media Administrator* or an *employee* needs to make a change to the administrators responsible for the *city social media* account, the following actions shall occur:

- Notify the City's *Social Media Administrator* and *Communications & Engagement Division* before the change needs to occur. Include whether the change in ownership is to a different administrator or to an entirely different department or board, as applicable, within the city.
- The new administrator shall be given all administrative rights to the social media site/account and the administrator's digital identity.
- Administrative rights for the departing administrator must be revoked immediately when such administrator separates from service or is transferred to a different role.

4.10 DEACTIVATING A SOCIAL MEDIA SITE/ACCOUNT

If a decision is made by the *Social Media Administrator* or *Communications and Engagement Division* to deactivate a social media site/account, because it is no longer of use, or accomplishing the goals of the city or department or board, or otherwise does not comply with city policy, the following actions shall occur:

- Confirm all public records management to preserve content related to the site/account has occurred
- Set a timeline for deactivating the site
- Develop a “sign-off” message to post on the site that includes when the site shall be closed and a “sign-off” message to post during the final days/weeks
- Confirm with the *Social Media Administrator* or *Communications and Engagement Division* once the site has been deactivated that the site is completely deactivated
- Determine whether to protect the site name by keeping it active to prevent use of the City’s name for improper purposes and upon a determination that it is necessary to protect the site name take all necessary action to do so.

4.11 USE OF CITY SOCIAL MEDIA SITES IN TIMES OF DISASTER OR EMERGENCY

In disaster or emergency situations, the *Division of Emergency Management* may assume control of *city social media sites* to ensure that communications are managed appropriately. The *Social Media Administrator* either directly or under the direction of the *Division of Emergency Management* must facilitate use of the *city’s social media sites* to ensure timely dissemination of information during the emergency.

4.12 EMPLOYEE OBLIGATIONS AND RESTRICTIONS IN OFFICIAL USE OF CITY SOCIAL MEDIA SITES/ACCOUNT

- 4.12.1** *Employees* assigned to work on and maintain *city social media sites/accounts* must adhere to the principles and standards articulated in this policy. Non-exempt *employees* must not work on departmental social media sites/accounts during off-duty hours unless specifically pre-approved to do so in writing by the *employee’s* supervisor. All such time worked outside the *employee’s* normal work schedule must be reported and included in the *employee’s* regular work week. If an *employee* is in a non-exempt position, any work in excess of 40 hours will be paid overtime either as compensatory time or as required by law and city policy.
- 4.12.2** City resources, work time, social media tools, and a city *employee’s* official position must not be used for personal profit, private gain or loss, or business interests or to participate in political activity. For example, a building inspector may not use the city’s logo (or its likeness), email, or work time to promote a side business as a plumber or support a political candidate.
- 4.12.3** An *employee’s* use of city resources or equipment, including the Internet or *city social media sites* is not private and an employee has no expectation of

privacy while using the Internet or the *city social media site*. An *employee's* use may be investigated and monitored at any time.

4.12.4 City resources, work time and social media tools may be used to a limited extent pursuant to the terms of any applicable Collective Bargaining Agreement and for concerted activity protected by federal, state or local law.

4.12.5 *Employees* shall protect all confidential and exempt information, including all sensitive information relating to city business, its *employees* or residents, as required by law or policy.

5.0 **PROCESS:**

5.1 **CONTROLLING AUTHORITY** - This Policy does not amend any duly adopted law or ordinance of the city.

5.2 **SEVERABILITY AND SAVINGS** - If any part or provision of this Policy or the application to any person or circumstance is held invalid or unconstitutional, such declaration shall not affect the other parts or provisions or application of the Policy which can be given effect without the invalid or unconstitutional part or provision or application and are therefore deemed severable.

5.3 **EFFECTIVE DATE.** This Policy shall become effective immediately upon adoption.