



## SOCIAL MEDIA POLICY

Subject  
SOCIAL MEDIA POLICY

Index: Communications & Marketing  
Number: 200-01

Effective Date:  
May 12, 2017

Supersedes:

Staff Contact:  
Joni Kirk

Clerk ID Number:

Approved By and  
Date: 5.12.2017  
rap

### 1.0 PURPOSE:

The City of Mill Creek strives to provide comprehensive communications to encourage informed citizen participation in local government. Third party community sites and social networks are becoming increasingly relevant to extending the City of Mill Creek's reach in community involvement, support of public works projects, economic development, recreation and tourism, and more. City social media channels are those which the City establishes and maintains, and over which it has control over all postings. City social media channels shall supplement, and not replace, the City's required notices and standard methods of communication.

City communication is best when it is consistent, branded, and delivered with one voice, including information posted on social media channels. This document establishes the basic guidelines, standards and instructions for the City of Mill Creek to use social media for the purpose of sharing time-sensitive and emergency information; enhancing customer service; providing information about City programs, places, people, events, issues, and projects; and marketing City goals and missions within an overall communications strategy.

It establishes guidelines for the City's social media sites to ensure consistency, accuracy, value to citizens, and compliance with State and Federal laws.

The policy also serves to prohibit inappropriate use.

This document applies to all City of Mill Creek employees, elected officials, City boards, as well as contractors, service providers and consultants when they are performing business on behalf of the City of Mill Creek.

Questions about any aspect of this social media policy should be directed to the Director of Communications and Marketing.

### 2.0 ORGANIZATIONS AFFECTED:

All City departments/divisions.

### 3.0 REFERENCE:

It is the employee's responsibility to be aware of any City of Mill Creek policies and standards, and any changes in those policies or standards that may impact any social media linked to the City's Web presence, including but not limited to:

- Personnel Policy Manual
- Emergency Management Plan

### 4. POLICY

The following procedures and standards shall be used by all departments/divisions in developing and using social media channels.

### 5.0 DEFINITIONS:

**5.1 Channel, Page or Site** – The location of an individual's or entity's presence on social media.

**5.2 City** – The City of Mill Creek, including any office, department, division, board, committee or other entity therein.

**5.3 City Manager** – The city's chief executive officer.

**5.4 Comment** – Replies or opinions in reference to the author's originating content; usually made by outside participants.

**5.5 Designee** – An employee who has been authorized in writing to produce, monitor and update social media content on behalf of the City of Mill Creek.

**5.6 Mill Creek Social Media (MCSM)** – Any social media channel created and/or operated by the City.

**5.7 Page** – The location of an individual's or entity's presence on a social media site.

**5.8 Post** – Content published using social media. Posts may include dialogue, pictures or embedded videos, and URLs.

**5.9 Posting** – The publishing of official City business information on social media channels.

**5.10 Public Information Officer (PIO):** The person authorized by the City Manager to manage and oversee social media content. At the City of Mill Creek, the PIO is the Director of Communications and Marketing.

**5.11 Record** – "Record" has the same meaning as defined in RCW 42.56.010(3).

**5.12 Social Media** – Any website, application or online medium that enables communication. This includes but is not limited to blogs, networking, photo sharing, video sharing, and microblogging.

**5.13 Social Media Provider** – An entity that hosts a social media application.

**5.14 Unsanctioned Solicitation** – Any advertising or promotion of goods or services on MCSM that is not sanctioned by the City.

**5.15 User** – A member of the public who subscribes to a social media site to receive regular updates (such as “followers” on Twitter and “fans” on Facebook).

## **6.0 PROCEDURES:**

### **6.1 Responsibilities:**

6.1.1 The City’s PIO, or her/his designee, is responsible for managing the City’s social media policy and MCSM in compliance with established rules and protocols. This includes the responsibility to audit City use of social media and enforce policy compliance.

6.1.2 It is the responsibility of the PIO to read and adhere to relevant policies, to maintain current, accurate information via City social media channels, and to ensure that the City is being appropriately represented to the public.

6.1.3 It is the responsibility of the PIO to consider departmental requests for social media accounts, to consider changes to City social media uses, and to provide support and monitor usage of social media channels.

6.1.4 The PIO is responsible for determining who is authorized to use social media on behalf of the City or a department, and for designating appropriate access levels.

6.1.5 The PIO shall not comment or interact on MCSM in a personal capacity. All viewpoints provided shall reflect the City’s viewpoints.

6.1.6 It is the responsibility of City Departmental Directors and designees to enforce this policy to ensure that relevant City standards are met, and to ensure that the use of MCSM meets the City’s needs.

### **6.2 Establishment of Social Media Channels**

6.2.1 The establishment of MCSM shall be supported by a strong business case that outlines 1) the purpose of the social media channel; 2) primary audience served; 3) the reason existing resources will not meet these needs; and 4) a desired launch date. No social media channel shall be established or operated without approval by the PIO's prior written authorization. Departments desiring a

new MCSM must submit an application to the PIO for a new social media channel, to change an existing social media channel, or to update social media designee(s). **See Appendix A.**

6.2.2 The City and its employees shall only use City-approved MCSM for City business.

6.2.3 The PIO shall have authority to deny establishment of any social media channel if the specific use of social media creates confusion on behalf of the City, branding guidelines are not followed, the level of organizational support within the requesting department is determined to be insufficient, or for other reasons set forth in this policy.

6.2.4 Some established City social media channels may require a specific use policy (e.g., Police Department), which shall be established in conjunction with the PIO, City Manager and specific department director.

6.2.5 MCSM shall be created and maintained in accordance with City branding and with identifiable characteristics of an official City site. Each social media channel shall display language identifying it as the official account of the City of Mill Creek, must display the City's logo, and shall contain a link to [cityofmillcreek.com](http://cityofmillcreek.com) and to this social media policy.

6.2.6 Each department with an approved social media channel shall designate in writing at least one MCSM designee and an alternate designee, who will oversee the department's use of social media. See **Section 6.3** for designated user information.

6.2.7 MCSM shall be created using user names and passwords that are not associated with any user names or passwords that are or might be used for personal business. The passwords should be dissimilar to other passwords used for City business and shall adhere to the City's password protocol. A city email address should be the account email address, and shall be directed to the PIO. The PIO shall approve and maintain records of all social media passwords and logins, and shall coordinate these activities with the Director of Finance and Administration.

6.2.8 Account password information shall only be shared with authorized staff that has been designated by the PIO. Designees are not authorized to provide access to other users and shall not disclose passwords. Account passwords shall promptly be reset when an employee is removed as a designee.

6.2.9 Social media sites shall be reviewed on an ongoing basis and audited every six months by the PIO to ensure that they are maintained in compliance with policies and guidelines, to measure progress on meeting goals, and to evaluate effectiveness. At any time, the PIO may take action on sites not being managed or monitored appropriately, or not in compliance with this policy, including shutting down the site.

### 6.3 Responsibilities of Designees on Behalf of the City of Mill Creek

6.3.1 Only designees who are authorized in writing by the PIO to post and/or comment on behalf of the City may do so. They shall sign a user agreement form. **See Appendix B.**

6.3.2 Prior to engaging in a sanctioned social media site, designees shall participate in a social media orientation provided by the PIO.

6.3.3 In addition to the PIO's responsibilities in Section 6.1, the PIO shall:

- a. Keep a record of the names and user names of designees for any accounts used on behalf of the City;
- b. Have administrative access to all MCSM;
- c. Ensure that all City personnel who use MCSM are trained in appropriate legal requirements and best practices.

6.3.4 Designees are permitted to access and maintain approved MCSM during regular work hours and to use City equipment in accordance with this policy.

6.3.5 Designees shall comment in an official capacity only to the extent and on the specific social media channels that they are expressly authorized to comment.

6.3.6 Designees are responsible for the content and upkeep of assigned social media channels. This includes monitoring postings and taking appropriate action when necessary to protect general site visitors from inappropriate or harmful information and links.

6.3.7 MCSM designees should review site activity and content daily for exploitation or misuse.

6.3.8 Before a designee is absent for planned leave, social media channel coordination must be assigned to the alternate designee or arranged with the PIO. In the event of an unplanned absence, the PIO shall designate back-up care of departmental accounts.

6.3.9 Designees shall not comment or interact on MCSM in a personal capacity; all viewpoints provided on MCSM shall reflect the City's viewpoints. Once posted by the City, such content can be shared from a designee's personal account.

6.3.10 The same standards, principles and guidelines that apply to City employees in the performance of their assigned duties also apply to an employee's use of MCSM.

6.3.11 From time to time, the PIO may direct that certain messages be posted on all MCSM. Designees shall comply with this directive.

6.3.12 Upon termination or transfer of position or job responsibilities, designees shall immediately stop using the account. If a designee is no longer authorized to serve in such a capacity for any reason, the PIO shall be notified immediately and a new designee assigned or the account shall be suspended.

## 6.4 Operational Procedures for MCSM

### 6.4.1 Professional Standards:

- a. As informational and conversational as social media channels are meant to be, social media use by the City is still considered official governmental communications. The content and tenor of social media conversations, discussions and informational posts on MCSM should model the same professional behavior expected of employees.
- b. In general, when using any MCSM, designees shall use good judgment and common sense. All designees shall be mindful that they represent the City when using MCSM, not themselves. The comments posted online can affect perceptions of personal credibility as well as the City's credibility. Designees shall exercise good judgment in making any comments.
- c. Postings should use proper grammar and standard style whenever possible, minimizing the use of jargon and acronyms that may not be widely understood by the public.
- d. When participating in social media on behalf of the City, designees shall identify themselves as employees of the City including: their name, the name of the City, and their role in social communications on behalf of the City. General identification listed on an "info" or "about" page is sufficient.
- e. When posting on MCSM, designees should be mindful that readers could include past and current employees, the media, City Council members, members and residents of the local community and business organizations, adjacent jurisdictions, and the public at large. Users may include those affected by or interested in the matter at issue and have different viewpoints. Accordingly, before publishing any post or information, care must be taken to consider the foregoing and work to ensure none of these groups are alienated.

6.4.2 Compliance with Laws: City and departmental use of social media shall comply with all applicable federal, state, county and City laws, regulations and

policies, including – but not limited to – copyright, records retention, First Amendment, privacy laws, and employment-related laws.

#### 6.4.3 Posting Content:

- a. Wherever possible, content posted to MCSM will be made available on the City's main website.
- b. Information must be verified as factual before it is published. Upon learning that a previous post includes incorrect and/or misleading content, the designee shall promptly post a correction and remove the incorrect post.
- c. Links shall be used to direct users back to the primary source (e.g., City website) for in-depth information, forms, and related documents or services. Links will be provided where possible when referencing a law, regulation or policy. See **Section 6.6** for additional information on links.
- d. Information must not be posted about policies or plans that have not been finalized unless explicit permission has been given by the City Manager.

6.4.4 Limitations on Content: Business that may not be conducted through MCSM includes making policy decisions, providing official public notices, and discussing items of legal or fiscal significance that have not previously been released to the public.

6.4.5 Comments and Replies: To encourage engagement and increase transparency, it is the City's intent to use social media as a method of two-way communications. To that end, comment features will be activated to allow users to make comments or ask questions.

- a. Social media comments should be reviewed daily.
- b. Designees shall assess the content of each post/comment to determine if it meets the content standards outlined in **Section 6.11**. Designees should immediately remove any comment that includes prohibited content.
- c. The City will not edit outside posts.
- d. Depending on content, some comments may be moved to the City's citizen request management tool for action.
- e. Designees shall avoid escalating topics on MCSM that are negative or heated, and can move conversations to a different forum if needed by providing a business phone number and/or email address at the City.

- f. When uncertain about a response to a query or post through social media, designees shall work directly with the PIO to determine the City's official response.

#### 6.4.6 Crisis and Emergency Information:

- a. Crisis and emergency information shall be approved by the PIO before it may be disseminated on MCSM.
- b. In the case of an emergency, if designees are able to access the MCSM for which they are responsible, they shall post the following message: "For emergency updates, visit [www.cityofmillcreek.com](http://www.cityofmillcreek.com)." Designees will be contacted by the PIO if further assistance is needed with outreach. Designees shall not post additional information unless instructed to do so by the PIO.

#### 6.4.7 Media Queries: All media queries through MCSM shall be directed to the PIO for response.

### 6.5 Specific Prohibitions: These specific prohibitions apply to MCSM designees.

6.5.1 No unpublished City news or information shall be posted to personal social media sites.

6.5.2 No posting shall identify or discuss personnel decisions or other matters that are confidential in nature.

6.5.3 There are restrictions that limit disclosure of information. Under no circumstance should restricted information be released via social media.

6.5.4 Content that violates a legal ownership interest of any other party is prohibited.

### 6.6 Links: The City of Mill Creek may select links to other social media sites and outside websites that offer helpful resources for users. City employees and users shall be aware of the following limitations.

6.6.1 Once a user links to another page or site, this policy no longer applies and users become subject to the policies of that page or site. The City is not responsible for the content that appears on any outside links and provides such links only as a convenience. Users shall be aware that these external pages and sites, and the information found on these pages and sites, are not controlled by, provided by or endorsed by the City. MCSM is intended specifically to share information about City programs, places and people.



6.6.2 The City reserves the right to limit or delete links posted on MCSM that violate this policy at any time without notice. The City specifically does not provide or allow links to:

- a. Websites or pages associated with, sponsored by or serving a candidate for elected office;
- b. Websites or pages supporting, endorsing or seeking to defeat any candidate for elected office or any ballot proposal;
- c. Purely commercial or organizational websites or pages with no affiliation to City projects, programs or people;
- d. Individual personal websites or pages;
- e. Individual religious websites or pages.

## 6.7 Accessibility

6.7.1 Section 508 of the Rehabilitation Act requires public agencies to make their electronic and information technology accessible to people with disabilities. To comply, descriptive captions must be provided for videos and photos, designees should avoid use of acronyms, and ensure that information is provided in accessible formats elsewhere.

## 6.8 Personal Use of Any Social Media by Employees on MCSM

6.8.1 City employees may privately express their personal opinions. Employees who comment on MCSM posts in a personal capacity are to identify their City affiliation and note they are not speaking on behalf of the City. Only official communications from designated MCSM will be considered the official opinion on City matters.

6.8.2 Employees must not use MCSM for political purposes, to conduct private commercial transactions, or to engage in private business activities. Inappropriate use of MCSM, whether posting as an individual or on behalf of the City, can be grounds for disciplinary action.

## 6.9 Elected Officials and Other Officials / Open Public Meetings Act

6.9.1 MCSM shall not be used by the City Council in violation of the Open Public Meetings Act. Councilmembers and other officials and appointed volunteers of city boards and commissions and other officials shall not comment or otherwise communicate on MCSM. Participating in online discussions may constitute a meeting under the Open Public Meetings Act (RCW 42.30).

## 6.10 Retention of Posted Information

6.10.1 All social media messages that relate to the functional responsibility of the recipient or sender as a public employee or official typically constitute a public record. Such records are subject to public inspection and copying according to the Public Records Act (RCW 42.56). Posts on MCSM are subject to the Public Records Act and associated Washington State Local Government Common Records Retention Schedule (CORE).

6.10.2 Third party services will be used to retain and maintain social media records pursuant to public records retention schedules.

6.10.3 Through this policy, which shall be linked to all City social media sites, the public is notified that all posts and comments are subject to public disclosure under the Public Records Act.

## 6.11 Removal of Content and/or Users

6.11.1 MCSM provides for a moderated online discussion about City matters and business. The City reserves the right to delete postings not in compliance with this policy or as otherwise deemed unacceptable by the City Manager or her/his designee. This includes, but not limited to, the following types of postings:

- a. Comments not topically related to City matters;
- b. Comments that endorse or oppose political candidates or ballot propositions, which are prohibited under state law (RCW 42.52.180);
- c. Graphic, obscene, explicit or racial comments, as well as comments that are abusive, hateful, and vindictive or intended to defame anyone or any organization;
- d. Posts or comments that promote, foster or perpetuate discrimination on the basis of creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability, or sexual orientation;
- e. Sexual content or links to sexual content;
- f. Solicitations, advertisements or endorsements of a commercial entity or venture that is not owned or operated by the City;
- g. Details about an ongoing investigation or legal or administrative proceeding that could prejudice the processes or could interfere with an individual's rights;
- h. Posting comments, photos or videos that suggest or encourage illegal activity;

- i. Information that may tend to compromise the safety or security of the public, public systems, or City employees;
- j. Content that violates a legal ownership interest of any other party, including copyrighted or trademarked images or graphics;
- k. Documents of any kind posted by users;
- l. Comments from children under 13 cannot be posted in order to comply with the Children's Online Privacy Protection Act. By posting on a City social media channel, users acknowledge that they are at least 13 years old. Those 12 years old or younger may email the City instead.

6.11.2 Persons making comments that include prohibited content may be temporarily or permanently blocked from commenting on the social media channel.

6.11.3 When an inappropriate comment is removed, available posting information (date, time, and commenter) will be retained.

## 6.12 Disclaimers on Public Engagement on Social Media Channels

6.12.1 The sole purpose of the use of social media by the City is to provide information to the public and to engage the public in a civil dialogue regarding only that information.

- a. **Personal Information:** All comments are public. The City does not control which information is gathered or used by the social media provider or by anyone using the social media site. Users should not include any information that they do not want public (e.g., social security number, date of birth, medical information, financial information, or personal contact information).
- b. **Liabilities and Penalties:** User comments may subject them to civil liabilities and penalties and to criminal penalties.
- c. **Retention:** The City shall retain user comments as part of public records retention requirements.
- d. **Disclaimer:** MCSM shall not to be used and will not be treated by the City as being used to submit requests, notices, or comments that the City is legally obligated to consider or respond to. Further, the City is not responsible for any kind of claims or harms of anyone that may result from the use of any social media site, including any claims arising from or harms caused by any posts or comments (e.g., containing prohibited content).

- e. **Non-Endorsements.** By not removing any content, the City is not endorsing any content of any parties other than City entities.
- f. **City Proprietary Rights.** No posts of employees or contractors of the City are intended to grant any person to use any property of the City or to affect any proprietary rights, such as a copyright or trademark of the City.
- g. **Disputes.** All claims in any way relating to participation on any City social media channel will be governed by the laws of the State of Washington and the U.S. Venue and jurisdiction shall be in Snohomish County Superior Court.
- h. **Terms of Service.** These provisions apply to the extent that they are not inconsistent with the social media provider's terms of service.

## 6.13 Copyright

6.13.1 Commercial use of text, City logos, photos and other graphics is prohibited without the express written permission of the City.

## APPENDIX A

### Social Media Usage Application Form

**Overview**

A City of Mill Creek department's use of social media is governed by the City's social media policy. Department Directors should review that policy before filling out this application. The Director of Communications and Marketing/Public Information Officer (PIO) has oversight of all social media content, and the Director has the responsibility to enforce this policy to ensure that relevant City standards are met, and to ensure that the use of social media channels meet the City's business needs.

**Request:**

Request for NEW social media channel                      Desired Launch Date: \_\_\_\_\_  
 Change to existing social media channel  
 Update social media designee(s)

**Social Media Channel(s):**

1. Which social media channel(s) would you like to use?  
 Facebook  
 Instagram  
 Twitter  
 YouTube  
 Other \_\_\_\_\_

2. Explain the business need for social media (including why the City's website or the City's main social media channels will not work.

3. Which audiences will be served by this channel?

4. Explain how existing resources will not meet these needs.

**Assign or Update Designee(s):**

1. Identify the person responsible (designee) for posting to and ensuring compliance of this social media channel, as well as an alternate designee. Each designee must be approved by the PIO and sign a user agreement.

Designee: \_\_\_\_\_ Alternate: \_\_\_\_\_

**Departmental Approval:**

Director Name: \_\_\_\_\_ Department: \_\_\_\_\_

Director Signature: \_\_\_\_\_ Date: \_\_\_\_\_

<i>PIO Approval</i>	
Signature _____	Date _____

## APPENDIX B

### Social Media Designated User Agreement

I have read, understand and agree to uphold the City of Mill Creek's social media policy.

- I will comply with the social media policy.
- I will participate in a social media training prior to official City social media use.
- I will not use City of Mill Creek or departmental social media channels to do anything unlawful, misleading, malicious, disrespectful, unprofessional or discriminatory.
- I will not post content that violates this social media policy, including anything that is derogatory, threatening, pornographic, or illegal.
- I will adhere to all intellectual property rights, to include all media content and forms. If I have a question about content rights, I will verify with the Director of Communications and Marketing.
- I will not bully, intimidate or harass any user.
- I will record and remove prohibited content in a timely manner.

I understand that violating this user agreement could lead to revocation of my social media use on behalf of the City of Mill Creek and possibly termination.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Department

***PIO Approval***

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date