

		<b>CITY OF DUVALL ADMINISTRATIVE POLICY AND PROCEDURE</b>	
<b>Title:</b>  City of Duvall Social Media Policy		<b>Subject:</b> Administration	
		Policy Number: Admin 25-01	
<b>Effective Date:</b>  10/07/2025	<b>Supersedes:</b>  Social Media Administrative Policy 8/8/2013  Social Media Operating Policy 8/8/2013  Res. 16.03: Use of Social Media by Councilmembers 6/6/2016	<b>Prepared By:</b>  City Administrator Cynthia McNabb	City Council approved 10/7/2025

**A. Purpose of Social Media Policy for the General Public**

The City of Duvall’s social media sites serve as online information sources, focusing on City issues, projects, news, and events, while also sharing information consistent with the City of Duvall’s mission, vision, and values with the public. While the City’s website ([www.duvallwa.gov](http://www.duvallwa.gov)) is the City’s primary internet presence, the City recognizes that, when used appropriately, social media can be a valuable tool in furthering the City’s goals and the missions of its departments by informing and interacting with the public.

This policy establishes guidelines for the general public’s interactive use of City social media sites. Other laws, ordinances, and policies may also apply to the use of social media; this policy should not be interpreted to conflict with any of these laws, ordinances, or policies, including the requirements specified by the Americans with Disabilities Act.

The City reserves the right to change, modify, or amend all or part of this policy at any time.

**B. No Open Public Forum; Improper Uses**

The following understandings are fundamental to the City’s social media policies:

1. No City of Duvall social media site is intended to be an ***open public forum***.

2. City social media sites are ***limited public forums***, and the City has an overriding interest and expectation in managing the information posted and the content that is attributed to the City of Duvall.
3. Any person or entity shall not use city social media sites to report crimes, hazards, the need for repairs, submit public records requests, make formal complaints or claims against the City of Duvall, or serve legal notice or process.
4. The City of Duvall does not accept or assume liability for any inaccuracies on a City of Duvall social media site. It does not guarantee that its sites will be error-free, permanent, or uninterrupted.
5. Comments and opinions expressed by members of the public on City social media sites are the comments and opinions of that individual alone, and do not necessarily reflect the opinions of the City of Duvall or its employees or officials.

### **C. Definitions**

1. “City officials” are the elected or appointed members of any council, Commission, or committee of the City of Duvall.
2. “City social media sites” are social media sites established and maintained by the City of Duvall, where the City has control over the content posted on the site except for advertisements or hyperlinks placed by the platform’s owners, vendors, or partners or linked by the City through a link to external content. The City of Duvall’s official website is not considered a social media site.
3. “City staff” or “City employee” means all employees of the City of Duvall, including temporary or seasonal, and those volunteers, contractors, and vendors who use City communications or equipment.
4. “Comment” means any content or link to content that is placed in response to a City post subsequent to its posting, usually by someone other than the original poster. This includes “likes,” thumbs-up or down, and other single-click interactions. “Commenters” are the persons commenting.
5. “Content” means the text, images, or audiovisual material contained in a post or comment.

6. “Disallowed content” describes content that may be removed by the City for violating the law or the City of Duvall Social Media Policies, as may be amended.
7. “Expressive activities” are speech and other conduct protected by the U.S. Constitution’s First Amendment rights to speech, assembly, petition for redress of grievances, and the exercise of religion.
8. “General public user” refers to a person using a City social media site who is not a City employee or City official.
9. “Limited public forum.” A limited public forum is a public space, property, or site (including a social media site) set aside by a governmental body for expressive activities that may be restricted as to subject matter or class of speaker.
10. “Moderate” and “monitor” refer to actions taken to ensure that posts and comments do not contain disallowed content. Designated City staff may monitor and moderate comments at their discretion to the extent allowed by law and City of Duvall Social Media Policies.
11. “Open public forum.” An open public forum is a public space, property, or site that is open for expressive activities of any kind.
12. “Personal Information” refers to any information that can be used to identify an individual, either directly or indirectly. This includes, but is not limited to, names, addresses, phone numbers, email addresses, social security numbers, driver’s license numbers, financial information, medical records, and any other data that can be linked to a specific person. Personal information also encompasses any information that, when combined with other data, can be used to identify an individual. The city is committed to protecting the privacy and security of personal information shared on its social media platforms.
13. “Post” or “posting” means information, articles, pictures, videos, or any other form of communication placed on a City social media site by designated City staff.
14. “Social Media” means content created through and on internet platforms by individuals, businesses, non-profits, or agencies, using accessible, expandable, and ungradable publishing technologies. Examples of social media platforms include,

but are not limited to: Facebook, X, blogs, RSS, YouTube, LinkedIn, Instagram, and Pinterest. Social media, in this context, also encompasses web and mobile cell phone applications, photo and video sharing sites, microblogging, and wikis. This definition is not intended to address any one particular form of social media, but rather social media in general, as advances in technology will occur and new tools for sharing information will emerge.

15. “Terms of use” or “comment policy” are the rules established by the social media platform owner and/or the City of Duvall regarding who may post to the site, what content may be posted, and what content might be subject to removal.

**D. Administration and Moderation by City**

1. City social media sites are limited public forums administered by designated City staff, and the City of Duvall reserves the right to hide content from view that violates this policy and to disallow or discontinue interactivity on any City social media site or a particular post.
2. The City of Duvall is not responsible for the placement of links or advertisements on City social media sites by the platform’s owners, vendors, or partners. The appearance of such ads and links on City social media sites does not imply that the City endorses or approves of any product, person, or service. The City of Duvall does not receive any revenue from any of these advertisement links.
3. The City of Duvall is not responsible for the moderation activities of the social media platform itself.
4. The City of Duvall cannot prevent the author of a comment on a City social media site from removing or altering their own comment.
5. The City of Duvall reserves the right to terminate any City social media site without notice. Additionally, it reserves the right to discontinue posting on social media sites without notice.
6. Links to the City of Duvall’s Social Media Policies will be displayed on the City’s website at [duvallwa.gov](http://duvallwa.gov).
7. Any content placed on a City social media site is subject to public disclosure.

8. To protect the privacy of the public, all comments that include sensitive personally identifiable information, such as social security numbers, shall be removed under applicable federal, state, and local law. The City hosts social media tools and sites, but they should not be considered secure. Additionally, the City does not warrant the security of information posted in comments.
9. Practical and legal considerations may sometimes constrain, prevent, or prohibit discussion by the City of certain topics, including, but not limited to, pending or actual litigation or investigations.

**E. Comment Policy for General Public Users (including City Employees and City Officials operating in their personal capacity)**

This section contains rules for the general public regarding commenting on City social media sites. These rules may be amended or supplemented to keep pace with changes in technology, the law, and a platform's terms of use.

1. All comments made to City social media posts are subject to moderation. The City of Duvall reserves the right to hide the following disallowed content and any other content deemed to violate this policy or any applicable law:
  - a. Comments not topically related to the post or article being commented upon, including but not limited to random or unintelligible comments;
  - b. Comments in support of or opposition to political campaigns or ballot measures;
  - c. Profane language or content;
  - d. Content that promotes, fosters, or perpetuates discrimination or harassment based on race, creed, color, age, religion, sex, marital status, national origin, disability, sexual orientation and gender identity, medical condition, veteran or military status, or any other protected class status;
  - e. Sexual content or links to sexual content;
  - f. Spam or solicitation or promotions of commercial services, entities, or products;
  - g. Content that discusses, encourages, or constitutes illegal activity, including threats and harassment;
  - h. Information that may tend to compromise the safety or security of the public or public spaces or systems;

- i. Content that violates a legal ownership interest of any other party, such as infringement of copyright or trademark dilution;
  - j. Repetitive or duplicate comments from a single general public user;
  - k. Comments from suspected “bot” accounts; or
  - l. Comments from children under 13 (in compliance with the Children’s Online Privacy Protection Act – COPPA).
  - m. Content suspected of containing a malicious link or virus.
2. The City of Duvall reserves the right to restrict the general public’s ability to comment on a particular post or genre of post, and to cut off comments after a certain length of time, in the sole discretion of the City.
3. The City of Duvall has discretion on the extent and manner of its moderation activities. As a general rule, no City social media site will be monitored and moderated on legal holidays or outside of the City’s regular business hours of 7:30 am to 4:00 pm, Monday through Friday.

#### **F. Posting and Comment Policy for City Staff and Officials**

This section outlines the rules for City employees and officials regarding posting and commenting on City social media platforms. These rules may be amended or supplemented to keep pace with changes in technology, the law, and the platform’s intended use.

1. All posts on City social media sites will be made available by designated City staff, with appropriate authorization, and the City is responsible for the posts’ content. The City may post content obtained from a third party, as well as the City’s own created content.
2. The City of Duvall reserves the right to cut off comments after a certain length of time, in the sole discretion of the City.
3. The City of Duvall has discretion on the extent and manner of its moderation activities. As a general rule, no City social media site will be monitored and moderated on legal holidays or outside of the City’s regular business hours of 7:30 am to 4:00 pm, Monday through Friday.
4. City staff representing the City of Duvall on City social media sites must conduct themselves at all times as professional representatives of the City and under all City policies.

5. Any City staff posting on any City social media site or commenting on a City social media site must review, be familiar with, and comply with the City of Duvall's Social Media Policies, any social media procedures adopted by the City, and the individual platform's terms of use.
6. City staff posting content on a City social media site or commenting on a City social media site may not express their personal views or concerns through such content; the posts must reflect the official views of the City of Duvall.
7. Unless officially designated as one of the City staff responsible for posting on social media sites, City staff must be clear about their role regarding the subject and the extent of the employee's authority to speak on behalf of the City if they post on the City's social media sites.
8. City staff responsible for social media posting, may, upon occasion, like, post or repost on, or respond to external social media sites on matters that relate to official city business such as, but not limited to, posting on social media sites of neighboring municipalities; non-profit or community organizations that partner with the City of Duvall, and/or on social media sites of local and State agencies.
9. In the event of an emergency or widespread misinformation, the City may use official channels to publish verified updates and clarify false claims. Social media may be limited during such events to minimize harm.
10. Posts on City social media sites must contain information that is freely available to the public and may not be confidential or otherwise privileged as defined by any City policy or state or federal law.
11. Posts on City social media sites must not contain any personal information, except for the names of City staff whose job duties include being available for contact by the public. Exceptions may apply when the City is using social media to manage emergencies.
12. City officials are expected to comply with the following rules regarding City social media sites to avoid violating or appearing to violate the Open Public Meetings Act or other ethics rules for elected persons:

- a. City officials may “like” posts on a City social media site, but should avoid comments, particularly if other City officials have interacted with the social media post;
- b. City officials may share items from their personal social media accounts on a City social media site only with prior approval of the City Administrator;
- c. City officials may not respond to, or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on City social media on any issue within the subject matter jurisdiction of the body to which they are elected or appointed;
- d. City officials may not create or contribute to any conversation on any social media platform involving their fellow City officials that could be construed as a serial meeting or a violation of the Open Public Meetings Act;
- e. City officials may not use a City social media site to further a political campaign, including their own, or to promote or oppose any legislation or initiative.
- f. City officials should not post content on any City social media site regarding the City that they know or should know is factually false or inaccurate at the time the content was posted. If a City official later becomes aware that the information they believed to be accurate was actually false, they should correct the false statements immediately after becoming aware that the information posted is false or inaccurate. This instruction does not serve as a prohibition or infringement on First Amendment rights, but rather serves as an advisement regarding the professionalism and decorum of city officials.

#### **G. Responses to Comments on Social Media Sites**

City staff designated to monitor or moderate comments on a social media site post should limit interaction to answering substantive questions and correcting misinformation, where applicable and helpful. City staff do not actively monitor or respond to direct messages on social media sites. Any correspondence with the public should be made through written email communication or phone calls to the appropriate staff person.

Non-designated City staff or City officials should not engage each other or other commenters who respond to a post. Any City staff person or City official who encounters content that may be disallowed in a comment should report it to the Communications team, the City Administrator, or their designees at the earliest opportunity. If the content contains serious threats or illegal activity, non-designated City staff or City officials should contact law enforcement in addition to the Communications Coordinator, the Communications team, or the City Administrator.

## **H. Use of Generative Artificial Intelligence (AI) on City Social Media Sites**

Generative AI can produce images, audio, video, or content based on prompts used by city staff. This can support the creation of helpful, appealing, or insightful communication resources. For example, AI can create a training video that guides residents through the process of reserving a meeting room by providing a video with an associated script, or create an infographic that details the do's and don'ts of placing material in the storm system. To address concerns with the use of generative AI on city-owned social media sites, the City of Duvall has created the following standards:

1. All AI-generated content will undergo a thorough human review for any inaccuracies and validation before finalization, dissemination, or implementation. AI-generated content should be viewed as a starting point, rather than a substitute, for professional judgment, expertise, and independent verification.
2. Images and videos created exclusively by generative AI systems will be attributed to the appropriate generative AI system.
3. Generative AI used in social media posting will be used in ways that respect the dignity, rights, and privacy of all individuals. It shall not perpetuate or amplify biases, discrimination, or harmful stereotypes.

## **I. Copyright and Commercial Use: Non-Official Use of City Identification**

The City will take care to respect artists and other content creators, obtaining explicit permission for use or only posting content that is available under a Creative Commons license. If a copyright holder notifies the City of Duvall that the City did not use an appropriate credit line, the City will request detailed information about the circumstances so that the necessary corrections can be made.

The use by any commercial entity of the City's logos or photos is prohibited without the City's express prior written permission. Use of the City logo is prohibited for any nongovernmental purpose. Use by business or individuals of City logos or other official City-identifying information in a manner that appears to impersonate or speak for the City or a particular department, or which could confuse the public about the origin of the information, is prohibited.

## **J. Serious Threats or Illegal Activity**

Any content posted on a City social media site that contains a serious threat or promotes illegal activity will be reported to law enforcement. The report to law enforcement will occur as soon as practicable after the City staff person becomes aware of the disallowed content.

The City employee must then follow all adopted procedures related to reporting that the City has developed to preserve the evidentiary value of the comment or post.

**K. Public Disclosure of City Social Media Records**

Comments appearing on City social media sites are subject to the Washington State Public Records Act, RCW Chapter 42.56 *et seq*, and shall be disclosed to the public upon request, so long as they are existing identifiable records prepared, owned, used, or retained by the City of Duvall. Posts and comments that have been disposed of under the Washington Secretary of State’s Retention Schedule are no longer prepared, owned, used, or retained by the City of Duvall.

**L. Retention of Social Media Records**

Posts and comments on City social media sites are subject to the Washington Secretary of State’s Retention Schedules and must be retained or disposed of according to those schedules.

**M. Security and Confidentiality**

Social media sites are susceptible to spoofing attacks and hacking. If City staff believe a site has been compromised, the City’s IT contact must be notified to take appropriate action.

**N. Right to Appeal Removal/Hiding of Content**

When a post or comment has been removed or hidden by the City, a commenter may seek to have the City reconsider the decision to edit, remove, or hide a comment by providing the City Clerk ([cityclerk@duvallwa.gov](mailto:cityclerk@duvallwa.gov)) with a written request stating the reason or reasons why the comment does not fall within the limitations established in this policy. The City Administrator, or their designee, shall strive to make a written decision on the request within two business days (excluding official City holidays) of receipt of the request, noting the basis for the decision. The decision of the City Administrator or designee shall be the final administrative decision of the City.

**O. Implementation of this Policy**

The City of Duvall will develop internal procedures to implement its Social Media Policies. These policies and procedures may change as social media technology, laws, and best practices evolve.