

DRAFT Internal Administrative Policy

Purpose statement

The Salt Lake City Council (the Council) uses social media to augment other communication methods, promote programs and initiatives, provide residents with additional information, complement and integrate other media for wider message distribution, and connect residents with programs or other service providers. The Council has an overriding interest and expectation in deciding what is “spoken” on its behalf on social media sites. This policy establishes guidelines for the Council’s official use of social media.

Training

Each person or group involved in the City Council’s official social media efforts must have a clear understanding of the Council’s social media policy. The Council’s Communication’s Team and the City Attorney’s Office will work together to provide trainings for those authorized to engage in social media on behalf of the Council. These policies would apply in circumstances where the social media account is considered to be owned or controlled by the Council. In addition, these policies should be considered where an elected official uses a social media account to conduct some Council business, even when conducting Council business is not the sole purpose of the account.¹ This is because a court is likely to conclude that First Amendment freedom of speech protections apply to the interactive comment space on a social media account that conducts some Council business. To “conduct Council business” has been broadly interpreted to include seeking general public input on any issues relating to the Council.

Management

The Council’s Communications Team should develop an organization structure that should address the following elements:

- Roles and responsibilities for those who create and manage the social media presence.
- One central contact person designated to oversee the social media program and to coordinate policy updates.
- Internal protocol for training social media posters consistent with this policy.
- Internal protocol for responding to comments consistent with this policy.

Centralize creation and/or approval of social media pages

The Communications Team will provide a social media template, which may include requirements to:

- Describe the account as “official” in the social media site account bio.

¹ Whether or not the First Amendment applies to certain accounts can be a fact-specific inquiry. If you have any questions about the application of this policy to specific social media accounts, please reach out to the City Attorney’s Office.

- Post the Social Media Comment Policy for Public Users (*see* Attachment 2) in the social media site account bio or “terms of use.”
- Provide links to official and relevant sections of the City website.
- Passing all site names and designs through the Communications Team.

Responding to offending posts or comments

In order to consistently and appropriately respond to public comments, the Communications Team will adopt the following plan to help manage public comments. The plan directs the Council in how to respond to comments or posts that violate the Council’s Social Media Comment Policy for Public Users:

- It is the default for offending posts or comments to remain on the social media pages or accounts.
- Protocol for hiding comments:
 - When a comment egregiously or consistently violates the Council’s Social Media Comment Policy for Public Users, a member of the Communications Team will reach out to the social media user and notify the user that their comment may violate the user policy, may be hidden, and ask the user to voluntarily remove the comment.
 - If the social media user continues to violate the Policy or fails to take down the comment, the Council may decide to hide the comment.
 - Before hiding the comment, a copy of the offending comment must be obtained and retained by the Council (for example, through a screen shot).
 - The Council must also notify the social media user that they have a right to appeal the decision to the Communications Team via email [email]. The Communications Team will make reasonable efforts to respond within two days of receiving the social media user’s email.
- Protocol for deleting comments or blocking a user:
 - If, after the Communications Team follows steps to hide comments (see above), the social media user continues to violate the City’s policy, the Communications Team may consider deleting the post or blocking the user.
 - If the Communications Team determines that a social media user may be blocked or their comment deleted, the City Council will again notify the user that their comment may violate the user policy, may be hidden, and ask the user to voluntarily remove the comment.
 - If the social media user continues or fails to take down the comment, the Communications Team may delete the comment or block the user.
 - If a comment will be deleted or if the comment causes the user to be blocked, the Communications Team must obtain and retain a screen shot of the comment before removing the comment or blocking the user.
 - Appeals of decisions to delete a comment or block a user may be submitted in writing via email to the Executive Director of City Council. The Executive Director of City Council will make reasonable efforts to respond within two days.

Records

The City Council must preserve records for the required retention period in a format that preserves the integrity of the original record and is easily accessible. Any removal or deletion of comments or posts by the public must be saved before deletion and retained by the City Council. Posts made to these sites may be considered public records and must be preserved pursuant to GRAMA. The City Council must also work with the City Recorder to ensure the records are properly retained.

Security

The Council should take all necessary steps to follow directions from City IMS to ensure that social media accounts are secure from accidental or intentional attacks. Passwords should be adequately complex to prevent cyberattacks. City employees should not send passwords through email. If a cyberattack is suspected, the Council should immediately contact IMS.

Notice

Because the public has the ability to communicate with the Council through social media, residents may choose to report an issue, request a City service, or seek more information regarding a City program via social media channels. However, such a request received through social media may serve as official legal notice for future lawsuits. Social media managers should monitor their feeds for these requests and notify the social media user that such requests are best directed through the preferred contact method.

DRAFT Social Media Comment Policy for Public Users

Any individual accessing or using this page (the “User”) accepts, without limitation, the following terms and conditions (“Policies”). The City maintains the right to modify these Policies without notice. Any change is effective upon posting to this page.

A User of this page is also subject to the terms of use of the website provider (“Provider”). The City Council has no control over a Provider’s terms of use, content, commercial advertisements or other postings produced by the Provider that may appear on this page as part of the Provider’s website environment.

Comment Policy

Posted content (comments, photos, links, etc., referred to hereafter as “Comments”) must relate to discussion of City programs, services, projects, issues, events, or activities. Comments posted on this web page will not be edited by the City Council. Comments that do not relate to the City Council business may be removed, including Comments that:

- Promote, foster, or perpetuate discrimination on the basis of race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, sexual orientation, or gender identity;
- Include slanderous, or defamatory attacks; threatening, harassing, or profane language; obscene or sexual content or links to obscene or sexual content;
- Solicit commerce or advertisements including promotions or endorsements;
- Promote or conduct illegal activity;
- Are spam that include links to external online sites;
- Violate a legal ownership interest of any person, including improper use of a trademark or copyrighted material; or
- May compromise the safety or security of the public or public systems.

Comments are the opinion of the commenter and do not necessarily reflect the opinion or policy of the City, its officers, employees, or agents.

Comments may be a public record subject to public disclosure under the Utah Government Records and Access Management Act (“GRAMA”).

Comments made on this page do not constitute a legal or official notice or comment to Salt Lake City and will not be regarded as a request for service.

A Comment asking for a public record will not be considered. A public record request can be made here:

[https://slcut.mycusthelp.com/webapp/_rs/\(S\(mst2cddkg2t2dpn5y4omkvpk\)\)/supporthome.aspx?sSessionID=%5BSESSION_ID%5D](https://slcut.mycusthelp.com/webapp/_rs/(S(mst2cddkg2t2dpn5y4omkvpk))/supporthome.aspx?sSessionID=%5BSESSION_ID%5D)

This web page may contain links to other websites not owned or controlled by the City Council. The City Council is not responsible for content that appears on these websites and provides links as a convenience only.

The City Council reserves the right to hide, remove, mute, or delete information posted by a User who violates these Policies or report the User to the Provider as violating the Provider's terms of use. A User who, in the opinion of the City, repeatedly or egregiously violates these Policies may be denied access to this page.

When one of the City Council's social media administrators suspects a violation of this Policy, the administrator will review and may remove of a Comment when appropriate. Egregious and continuous violations of this policy may lead to reporting the User to the Provider, hiding or deleting the Comment, or blocking or muting the User. Appeals regarding the City Council's decision to hide a Comment may be submitted via email. The City Council will make reasonable efforts to respond to appeals within two business days. Appeals regarding the Council's decision to delete the comment or block a user may be appealed to the Executive Director of City Council via email.

Copyright Policy

Information and materials produced by the City Council and posted on this page are City property. The City Council retains the copyright to all text, graphic images, and other content produced by the City Council. A User may, without obligation to the City, view, copy, link to, or distribute information found here if for non-commercial use, unless otherwise stated. However, the City Council makes no warranty that information on this web page is free of copyright claims or other restrictions on free use. Commercial use is prohibited.

Disclaimers

The City Council does not guarantee that Comments are monitored regularly, and therefore, Users should not use this page to contact or provide notice to the City about dangerous conditions on public property. If a dangerous condition exists, please contact the police department, fire department, public utilities, or other relevant department. The City Council does not guarantee the completeness or accuracy of any information posted on this web page. The City may suspend or discontinue this social media account at any time.

The information posted on this web page is provided on an "as is" basis and the User assumes the risk of use or reliance on such information. The City Council, its officers, employees, or agents are not liable for any damages for viewing, distributing, or copying of materials on this web page, including indirect, special, incidental, or consequential damages.

Contact Us

Questions about these Policies or this web page may be directed to _____. _____@slcgov.com.

RESOLUTION No. _____ of 2019

(Creating Sections A.51 (Council Office Internal Management of Social Media) and A.52 (Social Media Comment Policy for Public Users) of the City Council policy manual)

WHEREAS, the Salt Lake City Council maintains a Policy Manual that includes agreed upon expectations and standards of practice; and

WHEREAS, the Policy Manual serves as a resource for Council Members, Council staff, and Administration staff on daily practices and routine procedures, including agenda paperwork and scheduling, recurring internal procedures related to processing norms for community events, and travel for conferences; and

WHEREAS, providing the Policy Manual to the public furthers the values of transparency and open government, and can assist the public in understanding the Council’s practices.

NOW THEREFORE, BE IT RESOLVED by the City Council of Salt Lake City, Utah, that changes to the Policy Manual will be approved by resolution and the updated sections will guide Council procedures and will be shared as a resource; and

BE IT FURTHER RESOLVED that Sections A.51 (relating to the internal management of social media accounts) and A.52 (relating to social media comment policy for public users) of the Policy Manual are hereby created in substantially the form attached to this resolution.

Passed by the City Council of Salt Lake City, Utah, on _____, 2019.

Salt Lake City Council

By: _____

ATTEST:

City Recorder

Salt Lake City Attorney’s Office
Approve As To Form

Catherine Brabson