

SOCIAL MEDIA POLICY FOR VALLEY TRANSIT

PURPOSE

This policy document outlines the requirements for acceptable use and behaviors surrounding the social media accounts of Valley Transit, both for internal and external users.

Recognizing that social media platforms have become invaluable tools for communicating rapidly with large audiences, Valley Transit encourages the use of social media to communicate with stakeholders in a professional and official capacity. It is therefore important that Valley Transit social media accounts be established and managed in a manner consistent with our strategic marketing plans.

THIRD-PARTY CONTENT

Valley Transit does not necessarily endorse, support, sanction, encourage, verify, or agree with Third-Party comments, messages, posts, opinions, advertisements, videos, promoted content, external hyperlinks, linked websites (or the information, products, or services contained therein), statements, commercial products, processes or services posted on any social media site. We do not allow information intended to compromise the safety or security of the public or public systems. You participate at your own risk, taking personal responsibility for your comments, your username, and any information provided. All Third-Party content is subject to public records requests, and will be archived for this purpose.

ACCEPTABLE USE

Employees are not automatically allowed to use official social media channels to publish content, and due to public records laws should avoid posting official business posts on personal social media platforms if they are not authorized to speak on behalf of the agency. If an employee wishes to be able to post on official social media channels they must first receive written authorization from the General Manager to do so.

All posts and comments should align with the larger communication strategies as well as policies and procedures of Valley Transit and may need approval before being published. This especially holds true for any information governed by press/media policies. Whenever possible, posts should link back to official websites maintained by Valley Transit.

Content that should not be shared on Valley Transit social media channels include:

- Commenting on posts with content that is not topically related to the content being engaged
- Promotes or advertises commercial services, entities, or products not directly associated with Valley Transit, Token Transit, or iTransitNW
- Supports or opposes political candidates, ballot propositions, or anything else related to public votes/elections
- Is obscene or profane

- Discusses or encourages illegal activity or violence
- Promotes, fosters, or perpetuates discrimination on the basis of creed, color, age, religion, gender or gender identity, marital status, sexuality or sexual orientation, status with regard to public assistance, national origin, physical or mental disability, or any other protected class
- Provides information that may compromise the safety or security of the public or public systems
- Violates legal ownership rights or copyrights
- Is libelous or slanderous
- Violates an individual's right to privacy
- Criticizes or attacks any individual/organization

Inappropriate material will be subject to immediate removal and could result in disciplinary action and loss of the privilege of participating in social media posting for the poster if they are an employee of Valley Transit. These rules also hold true for employees' online replies to comments made by external users. Regardless of the inappropriate nature of these comments, employees must remain professional and continue to conform to the rules set out above when replying or performing any other action. Content violating these guidelines posted by a Third-Party will also be moderated.

Social media postings will not be considered formal public comments, but all comments and posts will become part of public records and be subject to public records requests.

The following basic guidelines will be used for moderating interactions on Valley Transit social media:

- Staff will hide any comments on Valley Transit social media channels that contain obscene language
- Staff will hide any comments that are defamatory and/or include references to specific individuals
- Staff will first notify the poster, and then hide any comments that are unrelated to the subject matter of the post, when the subject matter of the comment is inflammatory, could be construed to be an advertisement, or constitutes spam
- Staff and Board members should be mindful of state and federal meeting guidelines and refrain from discussing Valley Transit issues in a social media setting, especially if a quorum of members becomes involved
- Content should only be placed on Valley Transit official social media channels by designated staff members
- Paid advertising will be managed by an authorized employee paying for the advertisement, and seeking reimbursement from Valley Transit, to ensure that agency financial information is not connected to a personal social media account

- Staff will aim to make all communication as clear and concise as possible. This includes maintaining professional standards in terms of grammar and spelling and avoiding unnecessary acronyms and other jargon

Tips for successful use of social media:

- **Be Cautious-** If you are about to post information that makes you even the slightest bit uncomfortable, pause and consider if you should post at all. Be smart about protecting the agency and personal information. Remember that what is posted via social media is widely accessible, not easily retractable, subject to scrutiny, and will be around for a long time.
- **Post only what you know-** Make sure that what you post regarding Valley Transit falls into your area of expertise. Don't post about business you have no involvement in or knowledge of. There are too many opportunities for misperceptions to be created if you post on subjects that you aren't completely familiar with.
- **Be honest and straightforward-** All posts should be accurate and should avoid being misleading in any way. Present information in posts as simply as possible. Posts that are brief and to the point leave less room for misinterpretation. If you happen to post information that misses the mark, be quick to point it out and correct it.
- **Stick to the facts-** Post information that is based on your knowledge, rather than your opinion. Whenever possible, reference information that is available on the Valley Transit or iTransitNW websites or is otherwise easily accessible. By sticking to the facts, you will be seen as an unbiased, trusted source of information about Valley Transit business.
- **Know the rules-** Make sure that what you post complies with all Valley Transit Social Media and Personnel Policies and all other applicable laws, rules, and regulations. If you have questions about using social media, check with the General Manager. Remember whatever you post to social media sites is ultimately your responsibility, but still reflects on the agency.
- **Be Professional** – Employees must not use official agency social media to conduct private conversations, commercial transactions, or to engage in private business activities.

ACCEPTABLE USE OF PERSONAL ACCOUNTS

Employees should be aware that posting official Valley transit business on their personal page, could make that post, or their page, subject to Freedom of Information Act requests. Valley Transit does not restrict the use of personal social media accounts outside of work, but employees are encouraged to keep in mind that they will still be seen as representatives of the organization, even when posting to personal accounts, so any disreputable conduct will reflect badly on the organization. With that said, employees may not:

- Use these accounts to conduct organization business, except as an avenue to access the official page on social media platforms that require this access style
- Public official statements to personal accounts, unless authorized to speak on behalf of Valley Transit to the media
- Make use of official email accounts, login credentials, or agency equipment to log into these personal accounts, except as an avenue to access the official page on social media platforms that require this access style

Employees are also encouraged to:

- Make it clear that they do not speak on behalf of Valley Transit if choosing to respond from their personal account on any subject relating to public transportation
- Place a disclaimer in their user bio emphasizing the fact that all opinions are strictly their own

ACCOUNT APPROVAL

The following steps must be followed when a new official social media account is registered:

- The creation of the account must be undertaken/approved by the General Manager
- The account must be managed only through approved tools
- Those with approval to post to the social media account and manager content must be clearly indicated
- The account is added to the social media archiving platform before any content is published
- Only official organization credentials may be used to create and access the account unless a platform is proven to be a necessary tool but requires personal account access (i.e. Facebook)
- Account login credentials may not be shared with anyone who does not have official authorization to make use of the account

ACCOUNT DELETION

In the event a social media page will no longer be used, the following steps must be followed:

- Contact with the archiving software provider to verify that all existing page content has been archived according to agency guidelines
- Download a copy of the entire page history to the local Valley Transit server
- Unpublish and delete the social media page

CONTENT MODERATION

The following section applies to the content – such as comments and replies – posted to official social media channels by external users and will also be shared on the profile of each social media channel.

Content published to official social media channels – both internal and external users – is continuously monitored. Valley Transit will not allow content to be posted to official social media channels that:

- Makes use of profane or obscene material
- Contains any form of hate speech
- Depicts or encourages violence or other illegal activities
- Displaces confidential, sensitive, and/or personal identifying information (PII)
- Promotes commercial products/services (excluding those offered by Valley Transit)
- Contains partisan political statements
- Can reasonably be argued to place the public in danger

BLOCKING PUBLIC ACCESS

All official social media accounts are considered to be a limited public forum containing official organization communication, and citizens will therefore not be prevented from accessing the information they contain. While Valley Transit reserves the right to remove inappropriate content, it will refrain from blocking users from viewing and interacting with official accounts.

RECORDS RETENTION & THE PUBLIC RECORDS ACT

As a public-sector organization, all communication over social media channels are subject to public records laws. As a result, Valley Transit will endeavor to respond to all record requests related to its social media content. To accomplish this, all data related to Valley Transit's social media accounts is collected and archived.

The organization makes use of archiving and compliance software, and leverages this solution:

- Data is collected in a real-time, continuous, automated fashion and includes all activity such as posts, comments, likes, private messages, etc.
 - It also includes removed content such as deleted comments and unlikes
 - An archived Block List is maintained as a record supporting the no-blocking policy and practice
- All media related to content is collected, including photos, videos, live streams/broadcasts, stories, etc.
- All data is digitally signed (SHA-256) and timestamped in order to satisfy legal requirements for submitting digital content as evidence per the Federal Rules of Evidence
- All records are indexed based on specific criteria such as date, content type, and keywords to ensure that records can be quickly located and produced in an appropriate format for distribution (e.g., PDF)

As per the established retention schedule of Valley Transit, social media records are retained at the interval set by the State Archivist Requirements.