

Spokane Colleges Administrative Procedure

8.00.01-C Social Media Governance

Implementing Board Policy [8.00.01](#)

Contact: Chief Institutional Advancement Officer, 434-5109

1.0 Purpose

Spokane Colleges ("Spokane Colleges" or "the College") operates a wide variety of Official Social Media Accounts and recognizes the value of social media as an important and constantly changing tool. Spokane Colleges uses social media to enhance its communication and engagement with students, faculty, staff, alumni and others to support the Spokane Colleges mission, vision and strategic plan. Spokane Colleges' Official Social Media Accounts also offer a platform for speech by certain groups or for the discussion of certain topics and shall be administered in a manner that adheres to the principles of free speech.

This procedure establishes guidelines for official use of social media on behalf of Spokane Colleges and provides guidelines for use of official social media by Spokane Colleges faculty, staff, students, and volunteers.

This procedure only applies to Official Social Media Accounts that are created by and for college and district use for official purposes and is not intended to restrict, abridge, or otherwise abrogate academic freedom. This procedure does not apply to social media use within the instructional classroom environment when utilized within the curriculum. Spokane Colleges does not seek to regulate employees' personal uses of social media which do not involve college or district resources or affect college or district employment.

Compliance with this procedure protects the College's digital reputation and ensures compliance with all applicable state and federal laws.

2.0 Definitions

- 2.1 **Account Administrators**: Shall mean those Spokane Colleges employees, student-employees, or volunteers who are authorized to control, manage, monitor and maintain Official Social Media Accounts as a part of their job duties or to accomplish their official Spokane Colleges responsibilities. This includes creating, modifying, removing, correcting or otherwise transmitting content via a social media platform. Administrators are also charged with monitoring the College's Official Social Media Accounts for which they are an Administrator, which includes ensuring the account is active and the account has not been accessed without authorization.
- 2.2 **Directory**: A public digital database and record repository for Spokane Colleges' Official Social Media Accounts maintained by Marketing and Public Relations.
- 2.3 **Discrimination**: Prohibited unfavorable treatment of a person based on that person's membership or perceived membership in a protected status. Harassment is a form of Discrimination.
- 2.4 **Guidelines**: The Spokane Colleges Social Media Guidelines & Standards is an operational companion document maintained by Marketing and Public Relations, providing current procedures, training, intake forms, and platform-specific best practices for implementation of this procedure. The Guidelines may be updated administratively as platforms and best practices evolve.
- 2.5 **Harassment**: Prohibited form of discriminatory conduct that includes physical, verbal or other conduct that denigrates or shows hostility toward an individual or group because of their legally protected or perceived membership in a protected status and is sufficiently severe, pervasive and objectively offensive so as to substantially interfere with the terms and conditions of employment or substantially limiting the ability of a student to participate in or benefit from the College's educational and/or social programs.

- 2.6 **Official Spokane Colleges Business:** Activities performed by Spokane Colleges employee, or authorized volunteer or student as directed by his or her Department Head, in order to accomplish Spokane Colleges programs or department initiatives, or as required by the duties of his or her employment.
- 2.7 **Official Social Media Accounts:** Social Media Accounts that are sponsored by Spokane Colleges and officially represent Spokane Colleges, or a Spokane Colleges division, college, team, department, unit or program. All Official Social Media Accounts are owned by Spokane Colleges, and the College reserves the right to control the creation, administration, deletion, and/or maintenance of such accounts. This definition specifically excludes the Spokane Colleges website and College employee's Personal Accounts.
- 2.8 **Personal Account:** A website, blog, or similar digital media property owned and operated by any College faculty, staff, students, or any third party in their individual capacity, not for official College business.
- 2.9 **Posts or Comments:** All text, images, videos, audio, website hyperlinks and any other information published, posted and/or distributed through social media.
- 2.10 **Social Media:** External websites or services based on participant contributions to the content. Types of social media include but are not limited to blogs, micro blogs, social and professional networks, video or photo sharing, and social bookmarking.
- 2.11 **Supervisors:** Supervisors of academic and non-academic units, and others who have direct oversight responsibility for Account Administrators and Official Social Media Accounts within their area.

3.0 Legal and District Compliance

- 3.1 All uses of social media through Spokane Colleges computer systems, networks, and using employee time shall follow applicable laws, including the statutes and rules relating to Ethics in Public Service ([RCW 42.52](#)), privacy laws, intellectual property rights law, applicable social media site standards, and all other Spokane Colleges policies and procedures.
- 3.2 Do not use any personal identifiable information that is protected under FERPA. This includes identification numbers such as social security numbers or student ID, addresses, or phone numbers (other than authorized business addresses or phone numbers). Student record information shall not be transmitted via social media as noted in Spokane Colleges Administrative Procedure [3.40.01-B](#).
- 3.3 Official Social Media Account branding must conform to Spokane Colleges brand standards. Current logo files, color palettes, and visual guidance are provided in the Guidelines.
- 3.4 Spokane Colleges Official Social Media Accounts shall not be used to conduct online business transactions and will not ask for personal information or credit cards in social media accounts.
- 3.5 No Official Social Media Accounts shall engage in paid advertising without prior approval from and coordination with Spokane Colleges Marketing and Public Relations Department. All paid advertising at Spokane Colleges is coordinated and administered by the Spokane Colleges Marketing and Public Relations Department as noted in Spokane Colleges Policy [7.10.01](#) Advertising.
- 3.6 Spokane Colleges requires the permission of individuals (in the form of a photo/media release form) whose readily identifiable images will be used to promote the college online and in print publications. This form is available from M&PR and copies of all completed forms shall be provided to M&PR, which will maintain a repository of them. These forms

must be completed and signed before posting images.

- 3.6.1 **Public events and activities:** Because there is no expectation of privacy, the college does not need to obtain photo/media releases from those participating in and/or attending Spokane Colleges events and activities that are open to the public.

- 3.7 Use of copyright, trademark, or proprietary information is prohibited.

- 3.8 **Accessibility:** All content published to Official Social Media Accounts must meet applicable accessibility standards, including [Section 508 of the Rehabilitation Act](#), the [Americans with Disabilities Act](#), and [Washington State Policy 188](#). Implementation guidance, including alt text, closed captioning, and color contrast requirements, is provided in the Spokane Colleges Social Media Guidelines & Standards.

4.0 Use of Social Media during College Time and Using College Property

- 4.1 Employee uses of college computers, networks, and time while at work are reserved for college-related business, as approved by supervisors. Social networking unrelated to college business must be done on personal time using personal computers or devices. Occasional use of college resources may be permissible if the use is brief, infrequent, and otherwise complies with the [Washington State Ethics in Public Service Act](#) and all other Spokane Colleges policies and procedures.

5.0 Social Media as Public Record

- 5.1 As a public institution, content published by Spokane Colleges and its employees on Official Social Media Accounts is a public record and is subject to [Washington State Public Records](#) law and requests ([RCW 42.56](#)). The Public Record Act applies to all college Official Social Media Account(s) regardless of the form of the record (photos, posts, private messages, and deleted messages or posts).
- 5.2 All Spokane Colleges Official Social Media Accounts [must be archived](#) using a paid third-party social media archiving platform. Archived materials must be maintained according to Spokane Colleges' records retention schedule. Account Administrators must coordinate with the Social Media Manager to connect new accounts to the current archiving service.

6.0 Creating and Managing an Official Social Media Account on Behalf of the College

Account Administrators are the only individuals authorized to create and/or manage Official Social Media Accounts.

- 6.1 To create a Spokane Colleges Official Social Media Account and connect it to the social archiving software, approval must be obtained prior to opening the account through the intake process outlined in the Spokane Colleges Social Media Guidelines & Standards.

- 6.2 Account Administrators may operate and maintain an Official Social Media Account that is associated with Spokane Colleges only once they receive authorization for such use from the Social Media Manager. Training requirements are outlined in the Guidelines.

Spokane Colleges employees, student-employees, or volunteers, who are not authorized to operate and maintain an Official Social Media Account, may only act as content editors and must complete social media training. Every account must have at least two Account Administrator who is a professional staff member (non-student employee) at all times.

- 6.3 Account Administrators must maintain the validity and security of Official Social Media Accounts by regularly monitoring the account to ensure appropriate and authorized usage.

- 6.4 Social media demands a level of responsiveness; thus, Administrators are expected to monitor the College Official Social Media Account for which they are responsible and respond as necessary during regular College workdays to ensure compliance with this procedure.
- 6.5 The Social Media Manager will maintain a digital database that will include name and platform authorized account administrators for all Official Social Media Accounts and must be made aware of any administrator changes.

7.0 Creating and Posting Content

- 7.1 The only individuals permitted to comment, post, message or otherwise transmit content on the College's behalf via an Official Social Media Account are Account Administrators, or their designees, who have been authorized by the Social Media Manager.
- 7.2 All content published to Official Social Media Accounts is owned by Spokane Colleges. Anything published to an Official Social Media Account should be free of any copyright issues and appropriate for a public institution. Questions regarding copyrighted content should be directed at M&PR.
- 7.3 During a College or District emergency, Account Administrators shall not create their own emergency messaging. Administrators may repost or share information from the district's main social media accounts or refer their audience to those accounts for further information.

8.0 Correcting and Deleting Content Posted by the College

- 8.1 Despite best efforts, posts containing inaccurate or incorrect information may occur. Deciding whether to delete or correct a post depends upon the circumstances. Deleting a post is necessary when the content should never have been posted in the first place, such as those instances identified in Section 11.0. Correcting a post clarifies language while preserving the content of the original post.

9.0 Monitoring and Maintenance

- 9.1 The Social Media Manager reserves the right to dissolve or suspend accounts if they are not actively maintained or are not following Spokane Colleges policy and procedures. Notice and dormancy thresholds are outlined in the Guidelines. During the deletion process the Social Media Manager shall take all necessary steps to adhere to any applicable records retention schedule and provide notice to any other account Administrator.

10.0 Accountability

- 10.1 All policies and procedures are subject to the same accountability standards for the disciplinary process outlined for each employee category (faculty, classified, exempt, student) and in accordance with applicable collective bargaining agreements.

11.0 Prohibited Conduct

- 11.1 No College Social Media Administrator shall:
 - 11.1.1 Post proprietary or confidential information about the College, faculty, staff, administrators, students, and/or alumni
 - 11.1.2 Post information pertaining to any potential or active litigation involving Spokane Colleges
 - 11.1.3 Endorse or appear to endorse any commercial product not affiliated with a specific academic or athletic program (Cisco Networking, Toyota certifications, e.g.), service entity, political party, candidate, or other private interest.

- 11.1.4 A student organization, that has been recognized by Spokane Colleges Student Government Association and is granted funds via S&A fees may support or oppose political candidates, other political campaigns, or ballot measures. [RCW 28B.15.610](#). Such political statements are not made on behalf of the College and do not necessarily represent the District's or College's views.
- 11.1.5 Post personally identifiable information of another
- 11.1.6 Use vulgar or abusive language, engage in personal attacks of any kind, or use offensive terms that target specific groups
- 11.1.7 Communicate with members of the press about the College in their official capacity without express authorization from the Chancellor, President or MP&R.
- 11.1.8 Block any user the Official Social Media Account was created to service
- 11.1.9 Utilize a filter intended to prohibit comments, posts, messages, or other forms of communication containing certain words, phrases or verbiage.
- 11.1.10 Post any content that violates the platform's Terms of Service or Terms of Use
- 11.1.11 Use an Official Social Media Account for any unlawful activities or for activities that are malicious or have a harassing effect on other users or;
- 11.1.12 Except as provided by 12.3, remove any discussion that an Official Social Media Account was intended to facilitate

12.0 Moderating Social Media Comments and Posts

- 12.1 Through the creation of each Official Social Media Account, the College intends to create limited public forum for the benefit of the group identified by each Official Social Media Account.
- 12.2 Social Media allows for the submission of user-generated content. The College encourages discussion on Official Social Media Accounts that are responsive to college generated posts or transmissions. Users may comment, like, react, share, or retweet in response to a college initiated social media post.
- 12.3 Spokane Colleges is dedicated to providing a meaningful educational experience for our students and values equity, diversity, and inclusion within our community. Views that are expressed in Official Social Media Accounts do not necessarily represent the district or college's views, and we recognize that a thriving academic community is not possible without our students, fans, followers, and friends sharing their thoughts freely with one another on Official Social Media Accounts. Spokane Colleges reserves the right to monitor the conversations by removing comments and/or posts that are or contain:
 - Defamatory or libelous content
 - Content that constitutes discriminatory harassment toward a person based on their protected class.
 - Obscenity
 - Sexual or violent content or links to sexual or violent content
 - Conduct or encouragement of illegal activity
 - Threats or personal attacks that are directed, suggested, or implied
 - Comments or hyperlinks not meaningfully related to the topic presented
 - Violation of the Terms of Use or Terms of Service for the social media platform
 - Confidential or otherwise protected information
 - In violation of any law
 - Information that may compromise the safety or security of the public, public systems or campus community

- Repetitive posts of the same material that disrupt the normal operation of the forum
- Impersonation of someone else or identities that cannot be confirmed
- Commercial messages, including advertisements and solicitations and spam
- Support for or opposition to political campaigns or ballot measures unless the account is a student funded, student life account. See, [RCW 28B.15.610](#).

Posts, comments, replies, or any public commentary containing any of the above may be removed from the account as soon as practicable. Comments, posts, discussions, videos or any other form of communication will not be removed simply because they are negative or critical of the College or its employees. Inappropriate posts should be reported to the Social Media Manager and the Account Administrator.

Individuals who engage with the College Official Social Media Accounts do so at their own risk and agree to take personal responsibility for their comments, the information communicated and/or interactions. Accordingly, the comments expressed by an individual on an Official Social Media Account do not reflect the views of the College or District. Multiple violations may result in the Social Media Manager making the decision to restrict a person's ability to interact with Spokane Colleges on social media or other online forums as noted in this Spokane Colleges social media violations protocol.

- 12.4 When Spokane Colleges determines a user comment is in violation of the terms of use, the Social Media Manager will hide the relevant comment and take appropriate follow-up steps as outlined in the Guidelines.

Spokane Colleges reserves the right to immediately restrict individual's ability to comment in cases of egregious, illegal or dangerous violations such as threats or harassment.

13.0 Security

- 13.1 District Social Media Manager will coordinate with Information Services to determine and promote best practices to maintain Security of each account to prevent unauthorized access.
- 13.2 If an Account Administrator leaves their employment with Spokane Colleges, the Account Administrator must be immediately removed as an Account Administrator, and the account password must be changed to restrict access to the account as part of the Spokane Colleges offboarding process.
- 13.3 When an Account Administrator is replaced, the account password must be changed to restrict access to the account.

14.0 Spokane Colleges Employee Personal Social Media Use

14.1 Use of Spokane Colleges Name on Personal Accounts:

- 14.1.1 **Personal Content:** When participating in social media in a private capacity through personal accounts (not as a contributor to Official Social Media Accounts), employees are cautioned that when they identify themselves as a Spokane Colleges employee or refer to college employment matters and business, readers and viewers may believe this represents the official position of Spokane Colleges. Please consider the impact that posts, words, and engagement have on an employee's professional credibility and on Spokane Colleges through affiliation. When an employee identifies oneself as a Spokane Colleges employee or reference is made to a college employment matter, it is recommended that the employee state that their post or statement or social media account is of a personal nature and does not necessarily represent the views of the college or district.

14.2 Employee Connections on Social Media:

- 14.2.1 If employees are connected to one another on personal social media accounts, it should be mutually understood that this connection is outside of Spokane Colleges business. It should be noted that in certain cases, this relationship may still require mandatory reporting for state ethical violations such as harm to self or others, or illegal activity.
- 14.2.2 Employees are encouraged to use additional caution and discretion in connecting through their personal social media accounts with current Spokane Colleges students. Ensure any contact is in accordance with Spokane Colleges Administrative Procedure [2.00.01-L](#) Non-Fraternization and Consensual Relationships.

15.0 Other Considerations

- 15.1 Advertisements sold by the private social media platform companies that appear on any College Social Media Account are generally outside of the College's control. The appearance of non-College affiliated advertisements on College Social Media Accounts are neither a college endorsement nor a college promotion of the content contained in any such advertisement. When an individual clicks on an advertisement and leaves an Official Social Media Account page, the College is not responsible for transmission or content received from external websites.
- 15.2 Violations or perceived violations of this procedure should be reported to the Communications Director in the Marketing and Public Relations Department. Spokane Colleges may investigate and respond to all reports of violations related to this procedure and other applicable policies. Employees who violate any section of this procedure may have their status as an account Administrator revoked and/or be subject to disciplinary action under any applicable collective bargaining agreement and/or College policy. Students who violate this procedure may be subject to disciplinary action under the Student Conduct Code.
- 15.3 Spokane Colleges will not accept any legal notice via any Official Social Media Account.

16.0 Related Information

- 16.1 [Washington State Ethics in Public Service Act.](#)
- 16.2 [Washington State Public Records](#)
- 16.3 Administrative Procedure - [3.40.01-C Student Rights & Responsibilities](#)
- 16.4 Board Policy - [2.30.01 Equal Employment, Non-discrimination & Anti-harassment](#)
- 16.5 Board Policy - [7.10.01 Advertising](#)
- 16.6 Administrative Procedure - [7.30.05-A Acceptable Use of Information Technology Resources](#)
- 16.7 Administrative Procedure [2.00.01-L Non-Fraternization and Consensual Relationships](#)
- 16.8 [Northwest Athletic Conference Codebook](#) - Administrative Rules and Regulations Chapter 15