Implementing Board Policy 8.00.01

Contact: Chief Institutional Advancement Officer, 434-5109

1.0 Purpose

Community Colleges of Spokane ("CCS" 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. CCS uses social media to enhance its communication and engagement with students, faculty, staff, alumni and others to support the CCS mission, vision and strategic plan. CCS's 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 CCS and provides guidelines for use of official social media by CCS 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. CCS does not seek to regulate employees' strictly 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 CCS 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 CCS 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 CCS's Official Social Media Accounts located in the Graphics and Marketing section of the CCS Intranet (CCSNet).
- **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 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.
- 2.5 Official CCS Business: Activities performed by CCS employee, or authorized volunteer or student as directed by his or her Department Head, in order to accomplish CCS programs or department initiatives, or as required by the duties of his or her employment.
- **2.6 Official Social Media Accounts**: Social Media Accounts that are sponsored by CCS and officially represent CCS, or a CCS division, college, team, club, department, unit or

program. All Official Social Media Accounts are owned by CCS and the College reserves the right to control the creation, administration, deletion, and/or maintenance of such accounts. This definition specifically excludes the CCS website and College employee's Personal Accounts.

- **2.7 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.
- **2.8 Posts or Comments:** All text, images, videos, audio, website hyperlinks and any other information published, posted and/or distributed through social media.
- 2.9 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 photosharing, and social bookmarking. Examples of social media sites are YouTube, Facebook, Flickr, Snapchat, Twitter, Pinterest, Tumblr, TikTok, Instagram, LinkedIn, blogs etc.
- **2.10 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 CCS 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 CCS policies and procedures.
- 3.2 Do not use any personally 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 CCS Administrative Procedure 3.40.01-B.
- 3.3 When a social media platform permits a profile graphic, it is recommended the account display an official College or District logo or graphic. No portion of the logo may be altered. Logo usage should follow the consistent use of logos, colors and typefaces to reinforce the CCS brand. Best efforts should be made to ensure the following style guidelines and standards are met as shown in the CCS Style Guide. Contact Marketing and Public Relations ("M&PR") or visit CCS's Marketing and Public Relations Webpage for an approved logo or graphic.
- 3.4 CCS 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 CCS Marketing and Public Relations Department. All paid advertising at CCS is coordinated and administered by the CCS Marketing and Public Relations Department as noted in CCS Procedure 7.10.01 Advertising.
- 3.6 CCS 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 CCS events and activities that are open to the public.
- **3.7** Use of copyrighted, trademarked or proprietary information is prohibited.

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 <u>Washington State Ethics in Public Service Act and all other CCS policies and procedures</u>.

5.0 Social Media as Public Record

- As a public institution, content published by CCS and its employees on Official Social Media Accounts is a public record and is subject to <u>Washington State Public Records</u> 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).
- All CCS Official Social Media Accounts <u>must be archived</u> using a paid third-party social media archiving platform. Archived materials must be maintained according to CCS's records retention schedule. Please contact CCS Marketing and Public Relations at CCS.Skitch@ccs.spokane.edu to link social media accounts to the archiving software 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 CCS Official Social Media Account and connect it to the social archiving software, approval must be obtained prior to opening the account by submitting a Marketing Services Request.
- Account Administrators may operate and maintain an Official Social Media Account that is associated with CCS only once they receive authorization for such use from M&PR. Training shall be provided to Official Social Media Account holders at least annually to assist with knowledge of best practices and compliance. Additional self-service online training shall be provided along with a guide for account usage.
- 6.3 CCS 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 one Account Administrator who is a professional staff member (non-student employee) at all times. As is possible within the parameters of each social media platform, College Official Social Media Accounts must contain a statement that:
 - 6.3.1 Specifies the purpose of the account
 - 6.3.2 Identifies the group(s) the account is intended to service or the topics subject to discussion
 - Notes that all comments, likes, posts, message and any other interactions are subject to Washington State's Public Records Act

- Account Administrators must maintain the validity and security of Official Social Media Accounts by regularly monitoring the account to ensure appropriate and authorized usage.
- 6.5 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.
- 6.6 M&PR will maintain a digital database that will include name, platform, password, authorized account administrators for all Official Social Media Accounts and must be made aware of any changes to passwords or accounts.

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 M&PR.
- 7.2 All content published to Official Social Media Accounts is owned by CCS. 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 to M&PR.
- 7.3 During a College or District emergency, such as a weather emergency, death, fire, or damage to campus caused by extreme weather, Administrators shall not create their own message about the emergency. Administrators may repost or share information from the District's main social media accounts (SCC, SFCC and CCS Facebook, CCS Twitter, CCS Instagram e.g.,). Administrators may also refer their audience to the College's main social media pages for further information.
- 7.4 To the greatest extent possible within social media platforms, Administrators should make every effort to have their content meet accessibility standards.

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 M&PR reserves the right to dissolve or suspend accounts if they are not actively used within 90 days or are not following CCS policy and procedures. Fifteen days' notice will be given to the department or program via email before action is taken. This will not apply during Summer Quarter or for accounts set up specifically for annual events. During the deletion process M&PR 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 CCS
- 11.1.3 Endorse or appear to endorse any commercial product not affiliated with a specific academic or athletic program (Cisco Networking, Toyota certifications, eg.), service entity, political party, candidate, or other private interest.
- 11.1.4 A student organization, that has been recognized by CCS 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 CCS 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. CCS 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 on the basis of 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 particular 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 M&PR 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 M&PR Office making the decision to restrict a person's ability to interact with CCS on social media or other online forums as noted in this CCS social media violations protocol.

- 12.4 When CCS determines a user comment is in violation of the terms of use, CCS M&PR office will hide the relevant comment and take the following steps:
 - 1. After the first violation by a commenter, the commenter will be provided notice of the violation and reason why the comment was removed.
 - 2. After the second violation by a commenter, the commenter will be provided notice of the violation and the commenter's account will be suspended from commenting on CCC's social media platform for 30 days.
 - 3. After the third violation by a commenter, the commenter will be provided notice of the violation and the commenter's account will be suspended from commenting on CCS's social media platform for up to one year.

CCS 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 CCS, 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 CCS offboarding process.

13.3 When an Account Administrator is replaced, the account password must be changed to restrict access to the account.

14.0 CCS Employee Personal Social Media Use

14.1 Use of CCS 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 CCS employee or refer to college employment matters and business, readers and viewers may believe this represents the official position of CCS. Please consider the impact that posts, words, and engagement have on an employee's professional credibility and on CCS through affiliation. When an employee identifies oneself as a CCS 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 CCS 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 CCS students. Ensure any contact is in accordance with CCS Administrative Procedure 2.00.01-L Non-Fraternization and Consensual Relationships.

15.0 Other Considerations

- 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.
- Violations or perceived violations of this procedure should be reported to the Communications Director in the Marketing and Public Relations Department. CCS 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 CCS 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** CCS Administrative Procedure <u>3.40.01-C Student Rights & Responsibilities</u>
- **16.4** CCS Board Policy <u>2.30.01 Equal Employment, Non-discrimination & Anti-harassment</u>
- **16.5** CCS Board Policy 7.10.01 Advertising
- **16.6** CCS Administrative Procedure <u>7.30.05-A Acceptable Use of Information Technology</u>
 Resources
- **16.7** CCS Administrative Procedure <u>2.00.01-L Non-Fraternization and Consensual</u> Relationships
- **16.8** Northwest Athletic Conference Codebook Administrative Rules and Regulations Chapter 15

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