



CITY OF WASHINGTON, ILLINOIS
City Council Agenda Communication

Meeting Date: 12/1/25

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Agenda Item: Discussion - Social Media Policy

Explanation:

The purpose of this agenda item is to provide the City Council with an opportunity to review and discuss the City of Washington Municipal Social Media Policy. This policy outlines the standards, legal requirements, responsibilities, and operational procedures for all official City social media accounts. It ensures compliance with state and federal laws, promotes consistent communication practices across departments, supports accessibility, and establishes clear guidelines for content moderation and public interaction.

Fiscal Impact:

N/A

Staff Recommendation:

Staff recommend that the draft City of Washington Municipal Social Media Policy be assessed by City Attorney for legal review. Following review, staff further recommend that any additional comments or adjustments from Council or department heads be incorporated prior to bringing the policy back for formal adoption.

Action Requested:

Council is requested to review the draft policy, provide any feedback or suggested revisions, and authorize staff to proceed with legal review in preparation for final adoption.

City of Washington, Illinois Municipal Social Media Policy

***The sources in this document are meant to show precedent being set by other municipalities.**

1) Purpose and scope

This policy governs the creation, management, and moderation of official City of Washington social media accounts to inform the public, encourage civic participation, and provide timely updates about City services, programs, and emergencies. All accounts operated by the City, its departments, and its contractors on platforms such as Facebook, Instagram, Nextdoor, X, Threads, YouTube, Tik-Tok, and LinkedIn are covered. Personal accounts of employees and elected officials are addressed in Appendix C and D.

City accounts are operated as limited public forums. Comments must be on topic and must comply with the rules in Section 7 and Appendix A. Content moderation shall be neutral and consistently applied. This approach aligns with First Amendment case law and municipal best practice. ([Wheaton Official Website][1])

2) Legal compliance

City social media is subject to:

- Illinois FOIA (5 ILCS 140). Social media content may be public records and subject to disclosure. The City will retain and produce records as required. ([Illinois General Assembly][2], [Justia Law][3])
- Local Records Act (50 ILCS 205) and State Archives guidance. Social content is managed and disposed of per approved schedules, including when platforms are used for two-way communication. ([Illinois General Assembly][4], [Illinois Secretary of State][5])
- Open Meetings Act (5 ILCS 120). Elected officials shall not use comments or replies to deliberate City business as a quorum. ([Illinois Attorney General][6])
- ADA Title II. City digital content, including social media posts, must meet accessibility standards consistent with DOJ's 2024 final rule adopting WCAG 2.1 AA. ([Federal Register][7], [ADA.gov][8])
- State Officials and Employees Ethics Act (5 ILCS 430). No use of City accounts or resources for political activity. ([Illinois General Assembly][9])
- First Amendment. Moderation must be content-neutral within the limited forum and consistent with the Supreme Court's *Lindke v. Freed* test distinguishing personal and official speech. ([Supreme Court][10], [Congress][11], [The Wall Street Journal][12])

3) Governance and responsibilities

Account ownership: All official accounts are City property. Account credentials will be stored in the Communications vault (Monday.com) with multi-factor authentication.

Roles

- Communications Specialist (Account Owner): strategy, content calendar, platform settings, training, archival oversight.
- Department Liaisons: supply content, confirm accuracy, monitor comments during business hours for department posts.
- Moderators: trained staff who apply Appendix A rules consistently and document actions.
- IT (IT 360): security, SSO/MFA, incident response.
- Availability: Accounts are monitored during business hours. Social media is not monitored 24/7 and is not a substitute for 9-1-1. For emergencies call 9-1-1. (This mirrors peer policies. [The City of Naperville][13])

4) Account lifecycle

- Creation: New accounts require approval from the Communications Specialist and City Administrator. Use official emails, City branding, and a link to the City website.
- Changes: Renaming, adding admins, or platform expansion requires notice to Communications and IT.
- Deactivation: When an account is retired, Communications will capture and archive content per retention schedules before deletion.

5) Content standards

- Accuracy: Departments are responsible for factual accuracy. Corrections are posted promptly with “Update” or “Correction” headings.
- Crisis communications: The Communications Specialist or Incident PIO controls messaging during incidents in collaboration with City Administrator.
- Non-emergency reporting: Direct service requests to official channels (e.g., website forms). Do not accept FOIA requests through comments or DMs; direct to the City’s FOIA page and FOIA Officer (City Clerk). ([police.bloomingtonil.gov][14])
- External links and media: The City may restrict link or image attachments in comments to reduce malware, phishing, and impersonation risks, consistent with platform tools and peer practice. ([The City of Naperville][13])
- Copyright: Use licensed media or City-produced content. Credit creators when required.

6) Accessibility

- To meet ADA Title II and WCAG 2.1 AA:
- Provide alt text for images.
- Caption all videos; supply transcripts for long videos and podcasts.
- Avoid images of text. If unavoidable, include the same information in the caption.
- Use readable contrast, CamelCase hashtags, and clear link text.
- Provide accessible equivalents on the City website when platforms limit accessibility. ([Federal Register][7], [ADA.gov][8])

7) Public participation and moderation

The City welcomes on-topic questions and comments. Comments are subject to limited public forum rules. The City will hide or remove content, or limit a user’s ability to comment, only for the neutral, objective reasons below, applied consistently and documented in the moderation log (Appendix A):

1. Not topically related to the City post. ([peoriagov.org][15])
2. Incitement to imminent lawless action, true threats, or promotion of criminal activity.
3. Obscenity or sexual content prohibited by law.
4. Disclosure of personal identifying information, medical or financial information, or doxing.
5. Commercial promotions, spam, bots, or solicitations.
6. Intellectual property violations.
7. Malware, phishing, or deceptive links; mass posting of identical content.

8. Duplicate comments flooding a thread.

9. Unlawful discrimination or unlawful harassment as defined by applicable law.

10. Electioneering and political advocacy using City pages, consistent with ethics restrictions. ([Illinois General Assembly][9])

- Blocking or muting users is a last resort after repeated or egregious violations and must be documented with screenshots, date, rule violated, and reviewer initials. Maintain a current list of blocked users and reasons. Note: the PAC has treated records of blocked users as subject to FOIA. ([municipalminute.ancelglink.com][16])
- Appeals: Users may email communications@ci.washington.il.us within 10 business days. The Communications Specialist will review and respond within 10 business days.

8) Records management and FOIA

- Social media content (posts, comments, messages, moderation logs) is retained in accordance with the Local Records Act and State Archives guidance. Use an approved archiving solution to capture original and edited content, removed comments, DMs when feasible, and associated metadata. The City will maintain retention schedules and disposal approvals. ([Illinois Secretary of State][5])
- FOIA requests must be submitted through official FOIA channels. Social media is not a FOIA intake. The FOIA Officer will coordinate retrievals from the archive. ([Illinois Attorney General][17])

9) Elected officials and personal accounts

- Elected officials should maintain clear separation between official and personal accounts. Personal accounts should avoid using City titles, City logos, or official contact information and should include a profile disclaimer such as “Personal account. Views are my own.”
- When an official invites constituent input on personal pages about City business, the Lindke test may apply; avoid mixing official duties with personal accounts to reduce risk. ([Supreme Court][10])

10) Employee conduct

Employees posting in an official capacity must follow this policy, City ethics rules, and applicable HR policies.

Employees using personal accounts must not disclose confidential information, represent themselves as speaking for the City, or use City resources for political activity. ([Illinois General Assembly][9])

11) Security and privacy

- Enforce MFA on all admins; review admin lists quarterly; remove former staff within one business day.
- Use official shared mailboxes for account recovery.
- Report impersonation accounts to platforms and to Communications for takedown.
- Do not post PII, HIPAA-protected information, or nonpublic security details.

12) Child safety and sensitive content

Do not identify minors by full name without written guardian consent. Avoid posting school bus locations, precise home addresses, or schedules that could risk safety.

13) Complaints and public records about moderation

The City will keep a Moderation Log (Appendix A) and a Blocked Users Register that is retrievable for FOIA. ([municipalminute.ancelglink.com][16])

14) Training and review

New moderators receive onboarding on First Amendment basics, ADA accessibility, FOIA and records retention, platform tools, and the moderation matrix.

Communications will review this policy annually and recommend updates to the City Administrator and Council. Naperville, Wheaton, Peoria, Batavia, and Oswego policies were used as benchmarks. ([The City of Naperville][13], [Wheaton Official Website][1], [peoriagov.org][15], [bataviail.gov][18], [oswegoil.org][19])

15. Outside Requests for City Social Media Sharing

The City occasionally receives requests from outside organizations to share their content on City social media accounts. To maintain consistency, accuracy, and transparency, the following standards apply:

1. **Requests must be sent by email** to the Communications Specialist (or designated City email).
 - The email must include a **direct link to the specific Facebook post** the outside entity wants the City to share.
2. **The City will only share an existing post.**
 - The City will **not create graphics, design media, or write copy** on behalf of outside entities.
 - The City will not edit or recreate the content in any form. If the content is not posted and available as a live link, the City will not share it.
3. **Content will only be shared if it aligns with City priorities and follows all policy requirements**, including accessibility, neutrality, and the limited public forum structure of City accounts.
4. **Sharing is not guaranteed.**
 - Requests are reviewed case-by-case and may be declined at the City's discretion.

Community Guidelines (pin this to each profile)

Welcome to the official City of Washington page. We share updates on services, programs, City news, and events. We monitor during business hours. For emergencies call 9-1-1.

By participating here, you agree to keep comments on topic and respectful. We may hide or remove comments that are: off topic, spam, contain malware or deceptive links, solicit sales, share private or medical information, include unlawful threats or incitement, include obscenity or sexual content prohibited by law, violate copyrights, or constitute unlawful harassment or discrimination. Repeated violations may result in limited participation.

FOIA requests are not accepted here. Please use our FOIA page. Accessibility matters. If a post is not accessible to you, email communications@ci.washington.il.us and we will provide an accessible format.

This page is a **limited public forum**. We apply these rules neutrally and keep a record of moderation actions. ([police.bloomingtonil.gov][14], [Wheaton Official Website][1])

Appendix A - Moderator Playbook

A1. Triage workflow

1. Capture a screenshot and URL of the comment.
2. Determine if it violates a listed rule. If “no”, leave it. If “yes”, proceed.
3. Hide or remove per platform capability.
4. Log in the Moderation Log: date and time, post URL, user handle, rule violated, action taken, initials.
5. For repeat violations, issue a warning in-thread when appropriate:

“Thanks for weighing in. Please keep comments on the topic of this post. You can review our Community Guidelines on our profile.”
6. For egregious or repeated violations, limit the user’s participation and record in the Blocked Users Register. Note: this register is subject to FOIA. ([municipalminute.ancelglink.com])[16])

A2. Neutral removal criteria (quick list)

- Off-topic or duplicate flooding
- Spam, solicitation, malware, phishing, deceptive links
- PII, doxxing, medical or financial data
- True threats, incitement, illegal activity promotion
- Obscenity or illegal sexual content
- IP violations
- Unlawful harassment or discrimination
- Electioneering or political advocacy on City pages (ethics compliance) ([Illinois General Assembly])[9])

A3. Appeals template

Thanks for your note. We reviewed your appeal regarding moderation on \[date] for the post titled “[title].” Your comment was removed under our Community Guidelines for \[reason]. You may review our policy at \[City URL]. If you have additional information, reply to this message within 10 business days.

Appendix B - Records and FOIA

B1. Archiving

- Use an archiving tool that captures posts, edits, comments, replies, DMs (when feasible), deleted content, media, and metadata.
- Retain per the City’s approved schedule under the Local Records Act. Coordinate with the Illinois State Archives for disposal approvals. ([Illinois Secretary of State])[20])

B2. FOIA handling

- Direct all FOIA requests to the FOIA Officer and official channels.
- When responsive records include social content, export from the archive along with the Moderation Log or Blocked Users Register if requested. ([Illinois General Assembly])[2], [Illinois Attorney General])[17])

Appendix C - Employees and Personal Use

- Do not use City resources, time, or official accounts for political activity. ([Illinois General Assembly][9])
- Do not disclose nonpublic information.
- If identifying as a City employee online, clarify that views are your own.
- Refer service requests to official channels and avoid ad-hoc promises.

Appendix D - Elected Officials and Personal Pages

- Keep personal and official pages separate. Avoid City branding and avoid inviting official business on personal pages.
- If you post official notices, meeting information, or solicit input on City policy on a personal page, you may trigger the Lindke state-action test and limited public forum obligations. Keep lines clear. ([Supreme Court][10])

Appendix E - Platform Practices We Adopt, Next Page

Appendix E - Platform Practices We Adopt

- No FOIA through social. Link to FOIA page and staff directory for official contact. ([police.bloomingtonil.gov][14])
- Comment link limits may be enabled to reduce malware and impersonation, modeled on Naperville's approach. ([The City of Naperville][13])
- Pinned Community Guidelines and "not monitored 24/7" notice, consistent with Illinois peers. ([The City of Naperville][13], [bloomingtonil.gov][21])

Sources used to shape this policy

- Illinois Secretary of State, Managing Social Media & the State and Local Records Acts and Local Records guidance. ([Illinois Secretary of State][5])
- Illinois FOIA statute and Attorney General FOIA training materials. ([Illinois General Assembly][2], [Illinois Attorney General][17])
- DOJ ADA Title II Web and Mobile Accessibility final rule and fact sheet. ([Federal Register][7], [ADA.gov][8])
- Lindke v. Freed (U.S. Supreme Court, 2024) and plain-language summaries. ([Supreme Court][10], [Congress][11])
- Municipal exemplars from Illinois: Wheaton, Naperville, Peoria (IL), Batavia, Oswego, and disclaimers from Bloomington. ([Wheaton Official Website][1], [The City of Naperville][13], [peoriagov.org][15], [bataviail.gov][18], [oswegoil.org][19], [bloomingtonil.gov][21])
- PAC advisory on FOIA and blocked users list. ([municipalminute.ancelglink.com][16])

[1]: https://www.wheaton.il.us/191/Social-Media-Policy?utm_source=chatgpt.com "Social Media Policy - Wheaton, IL"

[2]: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=85&ChapterID=2&utm_source=chatgpt.com "(5 ILCS 140/) Freedom of Information Act"

[3]: https://law.justia.com/codes/illinois/2005/chapter2/85.html?utm_source=chatgpt.com "5 ILCS 140/ Freedom of Information Act. :: Illinois Chapter 5 ..."

- [4]: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=699&ChapterID=11&utm_source=chatgpt.com "LOCAL GOVERNMENT (50 ILCS 205/) Local Records Act."
- [5]: https://www.ilsos.gov/publications/pdf_publications/ard167.pdf?utm_source=chatgpt.com "[PDF] Managing Social Media & the State and Local Records Acts"
- [6]: https://illinoisattorneygeneral.gov/Page-Attachments/FOIAPAC/Updated%20Remote%20Meetings%20Guidance%20May%202023.pdf?utm_source=chatgpt.com "Guidance to Public Bodies on the Open Meetings Act at the ..."
- [7]: https://www.federalregister.gov/documents/2024/04/24/2024-07758/nondiscrimination-on-the-basis-of-disability-accessibility-of-web-information-and-services-of-state?utm_source=chatgpt.com "Nondiscrimination on the Basis of Disability; Accessibility ..."
- [8]: https://www.ada.gov/resources/2024-03-08-web-rule/?utm_source=chatgpt.com "Fact Sheet: New Rule on the Accessibility of Web Content ..."
- [9]: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2529&ChapterID=2&Print=True&utm_source=chatgpt.com "5 ILCS 430/ State Officials and Employees Ethics Act."
- [10]: https://www.supremecourt.gov/opinions/23pdf/22-611_ap6c.pdf?utm_source=chatgpt.com "22-611 Lindke v. Freed (03/15/2024)"
- [11]: https://www.congress.gov/crs-product/LSB11146?utm_source=chatgpt.com "Lindke v. Freed and Government Officials' Use of Social ..."
- [12]: https://www.wsj.com/politics/policy/supreme-court-sets-rules-for-politicians-blocking-critics-on-social-media-780ed397?utm_source=chatgpt.com "Supreme Court Sets Rules for Politicians Blocking Critics on Social Media"
- [13]: https://www.naperville.il.us/social-media-policy/?utm_source=chatgpt.com "Social Media Policy | The City of Naperville"
- [14]: https://police.bloomingtonil.gov/public-information/connect/social-media?utm_source=chatgpt.com "Social Media | City of Bloomington, Illinois"
- [15]: https://www.peoriagov.org/826/City-of-Peoria-Social-Media-Platforms-Po?utm_source=chatgpt.com "City of Peoria Social Media Platforms Policy"
- [16]: https://municipalminute.ancelglink.com/2020/09/pac-says-list-of-blocked-social-media.html?utm_source=chatgpt.com "PAC Says List of Blocked Social Media Users is Subject to FOIA"
- [17]: https://illinoisattorneygeneral.gov/Page-Attachments/2024%20FOIA%20for%20Public%20Bodies%20Webinar.pdf?utm_source=chatgpt.com "Freedom of Information Act for Public Bodies"
- [18]: https://www.bataviail.gov/988/Social-Media-Policy?utm_source=chatgpt.com "Social Media Policy | Batavia, IL - Official Website"
- [19]: https://www.oswegoil.org/residents/about-oswego/social-media-policy?utm_source=chatgpt.com "Social Media Policy | Village of Oswego, Illinois"

[20]: https://www.ilsos.gov/publications/pdf_publications/lr34.pdf?utm_source=chatgpt.com "Managing Your Records and the Local Records Act"

[21]: https://www.bloomingtonil.gov/government/advanced-components/social-media-disclaimer?utm_source=chatgpt.com "Social Media Disclaimer"