

EXHIBIT A

CITY OF WILLIAMSON SOCIAL MEDIA AND DIGITAL COMMUNICATIONS POLICY

Section 1. Purpose

The purpose of this Policy is to establish uniform standards for the creation, authorized access, use, and moderation of official social media accounts and digital communication platforms of the City of Williamson.

The City recognizes that social media and digital communications may be used to provide public information, announce City services and events, communicate emergency information, share official City updates and receive public comments concerning City matters.

This Policy is intended to:

- Protect the City's ability to communicate accurate and timely information.
- Distinguish official City communications from personal, campaign, private, or individual elected official communications.
- Preserve the public's right to comment on City matters in a viewpoint neutral manner.
- Avoid arbitrary, inconsistent, or subjective moderation decisions.
- Protect public records and ensure proper documentation of social media and digital communication activity.
- Establish a practical administrative handling process for official communication requests.

This Policy shall be administered consistent with applicable First Amendment principles, including the requirement that restrictions in limited public forums be reasonable in light of the forum's purpose and viewpoint-neutral.

This Policy establishes citywide legal, records, public forum, and administrative standards for official City communication platforms. It does not transfer day-to-day executive or administrative control of City communications from the Mayor to the City Council.

Section 2. Scope

This policy applies to:

- All official City social media accounts.
- All official City digital communication platforms.
- All persons authorized to create, manage, post to, administer, or moderate official City

communication platforms.

- Any department-specific official City social media account.
- Official communication requests submitted through the City's official communication request process.
- Any social media account or digital communication platform that is created, owned, controlled, authorized, operated, or maintained by or on behalf of the City.
- Public comments submitted to official City social media accounts.

This Policy does not apply to or convert an elected official's personal, private, or campaign account into a City account merely because the elected official holds public office.

Section 3. Definitions

For purposes of this Policy, the following definitions apply:

Administrator means the City employee, contractor, consultant, or administrative representative expressly authorized in writing to administer an official City communication platform.

City Account means any social media account created, owned, controlled, authorized, operated, or maintained by or on behalf of the City of Williamson.

Limited Public Forum means a forum opened by the City for a limited purpose, including public comment related to City business, City programs, City services, City events, City projects, City notices, or the specific subject of a City post.

Official City Business means matters involving City services, programs, operations, meetings, ordinances, policies, public notices, public safety, emergency information, projects, events, public facilities, public funds, departments, boards, commissions, committees, official actions, public records, or other matters within the City's governmental responsibilities. Official City Business does not include campaign advocacy, personal disputes, personal commentary, or statements primarily intended to promote, criticize, ridicule, or disadvantage an individual elected official, employee, candidate, private person, political position, or faction, except where communication concerns a formal City action, public meeting, public notice, adopted policy, approved program, official record, factual correction concerning Official City Business, or other identifiable governmental matter.

Official City Communication Platform means any City-owned, City-controlled, City-authorized, or City-maintained social media account, website page, newsletter, digital notice, press release, electronic announcement, public information platform, or other digital communication channel used by or on behalf of the City for Official City Business. For purposes of public comment, the term includes only those official City social media accounts or digital platforms that allow members of the public to submit comments, replies, messages, tags, posts, images, videos, links, or other user-generated content.

Public Comment means a comment, reply, message, tag, post, image, video, link, or other user-generated content submitted by a member of the public to an official City social media account. Restricted Access means any action that limits a user's ability to comment, reply, message, tag, access, or interact with an official City social media account, including blocking, muting, banning, limiting, filtering, or similar action.

Uniform Access means that elected officials shall have access to the same official communication request process and shall be subject to the same review standards, general response standards, practices, and content requirements. Uniform Access does not require every requested communication to be approved, posted exactly as submitted, posted immediately, or posted on every requested platform.

Viewpoint Discrimination means restricting speech because of the opinion, position, criticism, praise, perspective, disagreement, or viewpoint expressed by the speaker.

Section 4. Ownership and Control Of Official City Communication Platforms

4.1 City Inventory

All official City communication platforms are the property of the City of Williamson.

The City Clerk shall maintain a current inventory of all official City communication platforms.

The inventory shall identify:

- The account or platform name.
- The purpose of the platform.
- The person or position with administrative access.
- The person or position responsible for records preservation.
- Whether public comments are enabled, disabled, limited, or moderated.

No department, elected official, employee, contractor, volunteer, board, commission, committee, or individual representative may create or operate a social media account or digital communication platform in the name of the City, or in a manner that reasonably appears to be an official City communication platform, unless the account is authorized under this Policy and registered with the City Clerk.

4.2 Account Identification

Each official City social media account shall identify itself as an official account of the City of Williamson.

Where the platform allows, the account profile, description, pinned post, or public notice shall include a link to the City's website or the full Social Media and Digital Communications Policy.

4.3 Authorized Use

Official City communication platforms shall be used to communicate information on behalf of the City as a municipal corporation. Such information shall be related to Official City Business. Official City Business may include:

- Agendas, minutes, summaries, and official actions.
- City services, programs, events, public notices, and public education.
- City-sponsored or City-supported events.
- Elected official sponsored public events, meetings, forums, office hours, listening sessions, or constituent engagement opportunities that are open to the public and related to Official City Business.
- Employment opportunities.
- Information from City departments.
- Neutral, factual, and lawful election information.
- Official proclamations, recognitions, and ceremonial matters.
- Public meeting notices and reminders.
- Public safety, emergency, utility, road closure, sanitation, and service information.

Official City communication platforms shall not be used for campaign activity, electioneering, personal business promotion, private disputes, personal commentary, or communications that are not related to a formal City action, public meeting, public notice, policy, program, official record, factual correction concerning Official City Business, or other identifiable governmental matters.

Section 5. Implementation

The Mayor shall remain responsible for the administrative implementation of the adopting Ordinance and this Policy, provided that nothing in this Policy shall be construed to prohibit the City Council, by ordinance and budgetary authorization, from exercising its authority under Section 3.10 of the City Charter to establish or define communications-related positions, functions, or duties for the proper administration of official City communications.

All persons assigned, contracted, or designated to administer, coordinate, moderate, manage, post to, or assist with official City communication platforms shall be subject to this Policy.

Section 6. Account Access and Credentials

All login credentials for official City communication platforms shall be maintained by the City.

No individual shall create a City account using a personal email address, personal telephone number, campaign email address, private business email address, or private account credential unless specifically approved in writing as a temporary administrative measure.

The City shall maintain at least two authorized access points or authorized representatives for each official City social media account to ensure continuity, security, and records preservation.

When an employee, contractor, consultant, or authorized user separates from service, changes duties, or loses authorization, the City shall promptly remove that person's access and update all relevant passwords, recovery information, and administrative permissions.

Section 7. Official Spokesperson and Official City Communications

The Mayor, consistent with the Mayor's executive authority under the Charter, may communicate official City information and may designate appropriate City personnel, contractors, consultants, or administrative representatives to communicate official City information.

Official City communication platforms shall not be used to present the personal position of any individual elected official as the official position of the City unless the position reflects official City action, adopted policy, approved statement, public record, factual correction concerning Official City Business, or other lawful governmental communication.

Section 8. Official Use by Elected Officials

8.1 Uniform Access

All members of the governing authority shall have Uniform Access to the City's official communication request process for matters involving Official City Business.

Nothing in this section shall require the City to approve, publish, or post any communication that is inconsistent with this Policy, the adopting Ordinance, applicable law, Official City Business, confidentiality requirements, campaign restrictions, or the authorized use of official City communication platforms.

8.2 Delays and Capacity Limitations

If a complete request cannot be acted upon within the applicable response standard, the City should provide a brief written status update to the requester when reasonably practicable.

Permissible reasons for delay may include staff capacity, technical limitations, incomplete supporting materials, legal review, factual verification, platform limitations, emergency communications, public notice priorities, coordination with outside parties, or other administrative causes.

Repeated delays shall not be used in a manner that effectively denies Uniform Access to the official communication request process.

8.3 Personal or Campaign Uses Prohibited

Official City communication platforms shall not be used to support or oppose any candidate, campaign, ballot measure, political committee, political party, or election effort. This restriction does not prohibit neutral, factual, and lawful election information, including voter registration deadlines, election dates, polling locations, qualifying information, or official notices.

Official City communication platforms shall not be used as a vehicle to communicate information that is personal, private, commercial, confidential, or otherwise unrelated to Official City Business.

Section 9. Administrative Handling of Official Communication Requests

9.1 Uniform Request Process

The City shall maintain one standard written method for submitting official communication requests. The method may be a designated City email address, online form, shared administrative form, software platform, or other practical written process approved by the Mayor or the Mayor's administrative designee.

Required information for a complete request should include:

- The name of the requester.
- The subject of the requested communication.
- The proposed text, flyer, image, link, or summary.
- The requested platform, if any.
- The requested posting date or deadline, if any.
- The official purpose of the request.
- Whether the request is time sensitive.

9.2 Review Standards

The City shall review official communication requests for consistency with:

- Official City Business or governmental purpose.
- Accuracy and factual clarity.
- Platform suitability.
- City branding and formatting standards.
- First Amendment requirements.
- Campaign and election-related restrictions.
- Confidentiality and privacy obligations.
- Legal notice requirements.
- Emergency or public safety priority.
- The adopting Ordinance and this Policy.

9.3 Review and Response Standards

The City should ordinarily respond to complete routine requests within three business days and time-sensitive requests within one business day. These standards require a response, scheduling update, request for additional information, referral, return for edits, denial, or posting decision. They do not require that any communication request be posted within the stated timeframe.

A response may consist of:

- Posting the requested communication.
- Scheduling the requested communication.
- Returning the request for edits.
- Requesting additional information.
- Referring the request for legal or administrative review.
- Consolidating the request with related City communications.
- Redirecting the request to a more appropriate City platform.
- Declining the request based on this Policy, the adopting Ordinance, applicable law, platform suitability, or another documented administrative reason.

Requests requiring legal review, factual verification, substantial editing, graphics, photography, video, translation, coordination with outside parties, or records review may require additional time based on the work required.

9.4 Reports

The Mayor or the Mayor's administrative designee may provide periodic informational updates to the governing authority regarding official City communications, communication requests, upcoming public notices, event promotions, website updates, or related communication activity when such updates are practical and consistent with available staff capacity.

Section 10. Official Use by Employees

City employees shall not post to official City communication platforms unless authorized.

Employees posting to official City communication platforms shall maintain a professional tone and shall not engage in personal arguments, sarcasm, ridicule, political advocacy, factional messaging, or personal commentary in the name of the City.

Employees shall not use official City communication platforms to express personal opinions unless expressly authorized as part of an official City communication.

This provision is in addition to any other rule or policy applicable to employee use of social media.

Section 11. Public Comment Forum

11.1 Limited Public Forum

The City may allow public comments on official City social media accounts.

When public comments are enabled, the comment area shall be treated as a limited public forum. The City opens that forum for comments related to the specific City post, the City program being discussed, the City service being discussed, or the City business connected to the post.

The City does not open official City social media accounts for unlimited discussion of all subjects.

The City may moderate comments consistent with this Policy. All moderation shall be viewpoint neutral and reasonable in light of the purpose of the forum.

The City may disable comments on a post, account, or platform when the decision is applied in a viewpoint neutral manner and not for the purpose of suppressing a particular viewpoint. The City should document such decisions when practical.

11.2 Viewpoint Neutrality

The City shall not hide, remove, restrict, block, mute, or otherwise moderate a public comment because the comment criticizes, disagrees with, embarrasses, annoys, or expresses an unfavorable opinion about the City, the Mayor, a Councilmember, a City employee, a City department, a City policy, a City vote, a City project, or another matter of public concern.

Public criticism of government is protected speech unless it falls within a specific category of removable content set forth in this policy.

Section 12. Public Comment Rules

Public comments may be hidden or removed only if they fall within one or more of the following limited categories.

12.1 Comments Not Related to the Specific City Post

A comment may be removed if it is not related to the specific City post, the City service, program, meeting, project, event, public notice, or governmental matter identified in the post.

A comment shall not be deemed unrelated merely because it criticizes the City, the Mayor, a Councilmember, a City employee, a City policy, or a City action.

12.2 Spam or Repetitive Comments

A comment may be removed if it consists of spam, automated comments, repeated posting of the same or substantially identical comment, irrelevant mass postings, or repeated links or solicitations unrelated to the City post.

Before removing repetitive comments from an identifiable user, the City should preserve one copy of the comment if one copy is otherwise permissible under this Policy.

12.3 Commercial Advertising or Solicitation

A comment may be removed if it primarily promotes a private product, private service, private business, commercial transaction, or commercial solicitation unrelated to the City post.

This restriction does not prohibit discussion of local business related to a City post, economic development issue, permit matter, public event, or City program.

12.4 Campaign or Electioneering Content

A comment may be removed if it expressly solicits votes, donations, volunteers, campaign support, campaign opposition, election related action for or against a candidate, campaign party, political committee, or ballot measure, unless the City post itself concerns election information and the comment is related to that subject.

This restriction shall not be used to remove public policy opinions, criticism of elected officials, discussion of votes taken by elected officials, or discussion of City issues merely because those issues may be politically controversial.

12.5 Threats and Incitement

A comment may be removed if it contains:

- A true threat of violence against a person or group.
- A specific threat to damage property.
- Speech directed to inciting imminent lawless action and likely to produce such action.
- Instructions or encouragement to commit an immediate criminal act.

Where a credible threat appears, the Administrator shall preserve the comment and promptly notify the appropriate law enforcement or public safety personnel.

12.6 Obscenity and Sexually Explicit Material

A comment may be removed if it contains legally obscene material, pornographic material, or graphic sexual content unrelated to the City post. This provision shall not be used to remove protected discussion of matters involving health, public safety, crime, education, discrimination, or public policy merely because the topic is sensitive.

12.7 Disclosure of Protected Personal Information

A comment may be removed if it discloses protected personal information, including Social Security numbers, driver's license numbers, financial account numbers, medical information, private telephone numbers, private residential addresses, personal information concerning minors, or information protected from disclosure by law.

12.8 Malware, Phishing, or Harmful Links

A comment may be removed if it contains links or attachments that appear to contain malware, phishing attempts, viruses, credential harvesting, malicious redirects, or similar cybersecurity threats.

The City may use automated filters to screen for malware, phishing, harmful links, and platform-identified security risks if the filter is applied uniformly.

12.9 Impersonation

A comment may be removed if it falsely impersonates the City, a City official, a City employee, a law enforcement officer, emergency personnel, another government agency, or another identifiable person in a manner likely to mislead the public. This restriction does not prohibit parody, satire, criticism, or commentary that a reasonable reader would not understand as an official statement by the person or entity referenced.

12.10 Illegal Transactions

A comment may be removed if it offers, solicits, or facilitates an illegal transaction, including illegal drugs, stolen property, unlawful weapons transactions, human trafficking, fraud, or other criminal activity.

12.11 Copyrighted Material

A comment may be removed if the City receives a factually valid legal notice that the comment contains copyrighted material posted without authorization and removal is required by law or platform process.

12.12 Court-Ordered or Legally Required Removal

A comment may be removed if removal is required by court order, subpoena, binding legal directive, law enforcement preservation needs, or other applicable law.

12.13 Insufficient Basis for Removal

A comment shall not be removed merely because it is critical, negative, offensive, embarrassing, uncivil, disrespectful, allegedly false, allegedly defamatory, unsupported, or directed at a City official or employee, unless the comment also falls within a specific removal category listed in this Section.

Section 13. Procedure for Comment Removal

Before hiding or removing a public comment, the Administrator shall determine whether the comment falls within a specific category listed in Section 12.

The Administrator shall preserve the comment before removal unless immediate removal is required due to a true threat, disclosure of protected personal information, malware, criminal activity, platform security risk, or legal requirement. When immediate removal occurs before preservation, the Administrator shall create the best available record as soon as possible.

The moderation record should include, when available:

- Screenshot or copy of the comment.
- Date of removal.

- Platform or post from which the comment was removed.
- Specific section of this Policy relied upon.
- Person making or approving the decision.
- Brief explanation of the decision.

A removed comment shall not be permanently deleted unless required by platform function, court order, legal directive, cybersecurity necessity, or other lawful reason. Where permanent deletion occurs, the City shall preserve the best available record of the removed content.

Section 14. User Notice

When practical, the City may notify a user that a comment was removed.

The notice may state:

"Your comment on the City of Williamson official social media page was removed because it violated section ___ of the City Social Media and Digital Communications Policy. The City does not remove comments based on disagreement with a viewpoint. You may request review by submitting a written request to [designated email] within ten business days."

Failure to provide notice shall not invalidate a removal decision where notice is impractical, the user is anonymous, the platform does not permit notice, or immediate removal is necessary.

Section 15. Restricted Access, Blocking, and Banning

15.1 General Rule

Blocking or banning a user from an Official City social media account is a severe remedy and shall not be used as an ordinary response to a comment that violates this Policy.

The ordinary remedy is the removal or hiding of the specific comment that violates this Policy.

15.2 No Indefinite Blocking Based on Criticism

The City shall not indefinitely block, ban, or restrict a user from an official City social media account because the user criticizes the City, elected officials, employees, policies, departments, projects, votes, or City actions.

15.3 Temporary Restricted Access

Temporary Restricted Access may be used only for repeated documented violations of this Policy or for immediate serious violations involving threats, malware, protected personal information, criminal activity, impersonation, or repeated automated spam.

Any Restricted Access longer than seven days should be reviewed with the City Attorney or other legal counsel before implementation or as soon as practical after implementation.

Restricted Access shall be limited in duration and tailored to the documented violation.

15.4 Blocked or Restricted Users List

If any user is blocked, banned, muted, or otherwise restricted through a platform setting, the City shall preserve a screenshot or export of the blocked or restricted users list at the time of the restriction and when the restriction is lifted.

Section 16. Emergency and Public Safety Communications

During emergencies, public safety incidents, severe weather, law enforcement incidents, utility disruptions, road closures, or similar events, the City may limit comments temporarily if necessary to ensure the public can access accurate emergency information.

Any temporary limitation shall be viewpoint neutral, limited in duration, and documented.

The City may direct the public to official emergency channels for urgent reports, including 911, non-emergency dispatch, or designated emergency contact information.

Section 17. Enforcement

Violations of this Policy by City employees may result in corrective action consistent with City personnel policies and applicable law.

Violations by contractors, vendors, volunteers, board members, commission members, committee members, or other authorized users may result in removal of account access or other lawful action.

Violations by elected officials may be addressed through applicable law, City policy, ethics procedures, Council action where lawful, or other appropriate legal mechanisms.

Section 18. No Private Right of Action Created

This Policy is intended to guide City operations, establish Citywide standards, protect City records, and reduce legal risk.

Nothing in this Policy shall be construed to create a private right of action beyond rights otherwise provided by federal law, State law, the City Charter, or Other applicable law.

First Reading: August 6, 2026

Second Reading: September 3, 2026