

**Ordinance No. 983**

**MEDINA CITY COUNCIL**

**AN ORDINANCE OF THE CITY OF MEDINA, WASHINGTON,  
AMENDING MEDINA MUNICIPAL CHAPTER 2.48 TO COMPLY WITH THE  
PUBLIC RECORDS ACT, CHAPTER 42.56 RCW AND TO UPDATE CERTAIN  
TERMS AND REFERNCES; ADOPTING THE CITY OF MEDINA PUBLIC  
RECORDS POLICY; PROVIDING FOR SEVERABILITY; AND ESTABLISHING  
AN EFFECTIVE DATE**

**WHEREAS**, pursuant to RCW 42.56.100, the City of Medina (“City”) adopted Ord. 830 on July 14, 2008, which established rules and regulations related to public records; and

**WHEREAS**, certain references and terms in existing Chapter 2.48 are outdated and obsolete, rendering certain provisions superfluous; and

**WHEREAS**, the City Council desires to amend existing Chapter 2.48 in order to update certain references and terms as well as satisfy the City’s obligation under RCW 42.56.100 to adopt and enforce reasonable rules and regulations consistent with the intent of the Public Records Act;

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF MEDINA, WASHINGTON, ORDAINS AS FOLLOWS:**

**Section 1.** Amendment to MMC Chapter 2.48. Chapter 2.48 of the Medina Municipal Code is hereby amended as described in **Exhibit A**, attached and incorporated herein.

**Section 2.** Public Records Request Policy and Procedure adopted. The revised City of Medina Public Records Request Policy and Procedure is hereby adopted as described in **Exhibit B**, attached and incorporated herein.

**Section 3.** Previous Versions Superseded. Any previous versions of the City of Medina Public Records Request Policy and Procedure, whether or not adopted by City Council, are hereby superseded.

**Section 4.** Corrections. The City Clerk and codifiers of the ordinance are authorized to make necessary corrections to this Ordinance including, but not limited to, the correction of scrivener/clerical errors, references, ordinance numbering, section/subsection numbers and any references thereto.

**Section 5.** Severability. If any section, subsection, paragraph, sentence, clause or phrase of this Ordinance is declared unconstitutional or invalid for any reason, such invalidity shall not affect the validity or effectiveness of the remaining portions of this Ordinance.


**Section 6.** Effective Date. This ordinance or a summary thereof consisting of the title shall be published in the official newspaper of the City and shall take effect and be in full force five (5) days after publication.

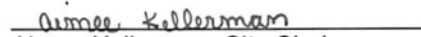
**PASSED BY THE CITY COUNCIL OF THE CITY OF MEDINA ON THE 8TH DAY OF JUNE 2020 BY A VOTE OF 7 FOR, 0 AGAINST, AND 0 ABSTAINING, AND IS SIGNED IN AUTHENTICATION OF ITS PASSAGE THE 8TH DAY OF JUNE 2020.**

  
Jessica Rossman, Mayor

Approved as to form:  
Ogden Murphy Wallace, PLLC

Attest:

  
Scott M. Missall, City Attorney

  
Aimee Kellerman, City Clerk

PUBLISHED:  
EFFECTIVE DATE:  
ORDINANCE NO.: / AB

## EXHIBIT A

### **Medina Municipal Code Chapter 2.48**

**2.48.010 Relationship to Public Records Act.**

This chapter constitutes the city's rules and regulations to carry out and implement the Public Records Act, Chapter 42.56 RCW.

**2.48.020 Public records officer.**

The city clerk shall serve as the city's public records officer. Contact information for the city clerk will be made available to the public in a manner reasonably calculated to provide notice of to whom members of the public may direct requests, such as posting such contact information at City Hall or on the city's website.

**2.48.030 Hours for inspection and copying.**

Public records shall be available for inspection and copying during office hours.

**2.48.040 Index of public records; Findings.**

A. The Public Records Act requires all cities and public agencies to maintain and make available a current index of all public records.

B. RCW 42.56.070(4) provides that an agency need not maintain such an index if to do so would be unduly burdensome, but it must issue and publish a formal order specifying the reasons why and the extent to which compliance would be unduly burdensome or would interfere with agency operations.

C. The city is comprised of numerous departments, their divisions and subdivisions, many if not all of which maintain separate databases and/or systems for the indexing of records and information.

D. Because the city has records which are diverse, complex and stored in multiple locations and in multiple computer systems, formats and/or databases, it is unduly burdensome, if not physically impossible, to maintain a current index of all records.

**2.48.050 Index of public records; Order.**

Based upon the findings set forth in MMC 2.48.040, and pursuant to RCW 42.56.070(4), the city council orders the following:

A. The city is not required to maintain an all-inclusive index of public records due to the undue burden and near impossibility of maintaining such an index.

B. The city will make available for inspection and/or copying all public records, including any indexes that are maintained by the city as set forth in MMC 2.48.030, except to the extent that such records are exempt from public disclosure.

**2.48.060 Disclosure of public records.**

Unless exempt from disclosure under this chapter or other law, public records shall be available for inspection and copying in accordance with this chapter.

**2.48.070 Request for inspection or copying.**

A. All persons desiring to inspect or obtain a copy of any public record should make their request in writing to the city clerk. At a minimum, the request should include the following:

1. Contact information for the requestor; and

2. A description of the record(s) requested.

B. The city clerk may create and provide for public use a standard form by which a requestor may use to request public records. Reasonable assistance as may be necessary to help a requestor locate particular records shall be provided either by the city clerk or by the city department maintaining the records; provided, that the provision of such assistance shall not unreasonably disrupt the normal operations of the city clerk, the department, or the assisting employee.

B. Except to the extent required or authorized by law, the city clerk shall not distinguish among persons requesting records. Persons requesting records shall not be required to provide information as to the purpose for the request, except to establish whether the inspection or copying would violate Chapter 42.56 RCW or other statute or ordinance that exempts or prohibits disclosure of specific information or records to certain persons.

**2.48.080 Processing public records requests.**

A. Responses to requests for public records shall be made promptly pursuant to Chapter 42.56 RCW. Within five business days of the date of receipt by the city of a written request for a record, the city clerk shall:

1. Provide the record; or
2. Acknowledge that the city has received the request and (a) provide a reasonable estimate of the time the city will require to respond to the request, or (b) request clarification; or
3. Deny the public record request in whole or in part.

B. Public records may be made available on a partial or installment basis as records that are part of a larger set of requested records are assembled or made ready for public inspection or copying. Additional time to respond to a request may be based upon the need to clarify the intent of the request, to locate and assemble the information requested, to notify third persons or agencies affected by the request, or to determine whether any of the information requested is exempt. If a public records request is unclear, the city clerk may ask the requestor to clarify what records the requestor is requesting. If the requestor fails to clarify the request, the city need not further respond to or process the request. If copies of the records are provided in an installment and the records are not paid for in accordance with MMC 2.48.100 or reviewed within thirty (30) days after the city provides notice of availability of the installment, the city is not obligated to fulfill the balance of the request.

C. If the city clerk determines that the responsive public record is exempt in part but can be made available after redaction of exempt portions, the request shall be granted; provided, that such exempt portions shall first be redacted and a written explanation with a citation to the statutory exemption permitting the redaction shall be provided to the requestor. If the city clerk denies the request, in whole or in part, a written explanation with a citation to the statutory exemption permitting the denial shall be provided to the requestor; provided, that nothing herein shall be construed as requiring the city to disclose portions of a requested record if the entire record is exempt from disclosure.

**2.48.090 Exemptions.**

The city adopts by reference the exemptions from public disclosure contained in Chapter 42.56 RCW, including any future amendments thereto or recodification thereof, along with any other exemption or exception to the Public Records Act provided by law.

**2.48.100 Fees.**

A. No fee shall be charged for the inspection of public records. Any person who requests a copy of any public record from the city clerk shall pay to the city a copying fee in accordance with the fee scheduled authorized in MMC chapter 3.64.


B. The city may, at its discretion, require the requestor to deposit a sum in an amount not to exceed 10 percent of the estimated cost of providing copies for a request. If the records are made available on a partial or installment basis, the city may charge for each part of the request as it is provided.

**2.48.110 Model rules and administrative procedures.**

The city may, in its discretion, follow the Public Records Act Model Rules promulgated under Chapter 44-14 WAC on file at the city clerk's office or the Public Records Policy adopted by City resolution. The city manager, upon recommendation of the city clerk, may issue additional administrative procedures for the implementation of this chapter.

**EXHIBIT B**



<b>PUBLIC RECORDS ACT COMPLIANCE POLICY</b>	
<b>EFFECTIVE DATE:</b> June 8, 2020	<b>PREPARED BY:</b> Aimee Kellerman, City Clerk/PRO
<b>REVISED:</b> <b>SUPERSEDED:</b>	<b>APPROVED BY:</b>  _____ Michael Sauerwein City Manager

<b>SECTION</b>	1.0 – General
<b>INDEX:</b>	2.0 – Definitions
	3.0 – Policy
	4.0 – Procedure
	5.0 – Fees
	6.0 – Refences
	7.0 – General Duty
	8.0 – Corrections

**1.0 GENERAL**

The City is required by chapter 42.56 RCW (the “Public Records Act” or “Act”) to adopt and enforce reasonable rules and regulations to provide full access to public records. This policy and procedure comply with the requirements of the Public Records Act by providing for consistent and predictable practices for responding to and fulfilling requests for public records in a manner consistent with the Act.

The policy portion of this document clarifies the City’s goals and intent with respect to providing access to public records. The procedure portion of the document describes the process for requesting and fulfilling public records requests in keeping with legal requirements.

These policies include statutory requirements and best practices. Nothing in this policy is intended to create legal obligations or rights beyond those obligations and rights created by statute or other binding laws.

## 2.0 **DEFINITIONS**

For the purpose of this policy, the following definitions apply:

**2.1 “All records relating to,”** “all records regarding,” or “all records pertaining to” means those records that directly and fairly address the topics that are reasonably identifiable by the Records Liaison fulfilling the request. These phrases are inherently ambiguous and requestors are encouraged to avoid using such terms when possible to avoid unnecessary delays.

**2.2 “City of Medina”** means the City of Medina, Washington. The City of Medina is a general-purpose governmental entity that provides a broad range of municipal services allowed by statute or charter. These services include police, street maintenance, planning and zoning, parks and recreation, and general administrative services.

**2.3 “Exempt record”** means records or portions of records that are exempt from public disclosure. Exemptions include those identified in the Public Records Act or in other statutes incorporated by RCW 42.56.070. Exemption from disclosure of a portion of a record does not automatically exempt the remainder of the record from disclosure. Exempt portions of records may be subject to redaction.

**2.4 “Public record”** means any writing containing information relating to the conduct of government or the performance of any governmental or proprietary function prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics. Electronic data, including email, that meet this definition shall be considered a public record. Records created or received by employees using non-city devices only meet the definition of public record if the employee was acting within the scope of employment when the record was created or received.

**2.5 “Public records request”** means a request made to the City of Medina pursuant to the Public Records Act for disclosure of public records. Requests for public records made pursuant to other statutory rights of access to public records shall not be considered “public records requests” but may be otherwise handled under this policy.

**2.6 “Public Records Liaison” and “Records Liaison”** means the person or persons designated by a department director or designee to accept, track by log, and arrange for fulfillment of requests for disclosure of public records within a City department.

**2.7 “Public Records Officer”** means the City Clerk or designee.

**2.8** “**Record holder**” means the department or particular staff person in custody of a primary record.

**2.9** “**Requestor**” means the individual making the request for public records by submitting an official public records request.

### **3.0 POLICY**

#### **3.1 General**

Public records maintained by the City of Medina are and remain the property of the City. It is the policy of the City of Medina to provide access to public records in accordance with the requirements of Chapter 42.56 RCW. Procedures governing access to public records shall ensure access to public records without discrimination to requestors and shall provide appropriate safeguards for information exempted from or prohibited from disclosure by statute.

In order to fully assist the public in requesting public records, the City shall encourage the use of available electronic resources whenever possible for accessing, requesting, and fulfilling requests for public information, including use of email and provision of information on the City’s website.

#### **3.2 Public Records Officer**

The City Clerk shall serve as the Public Records Officer of the City of Medina. The City Clerk may appoint a designee to fulfill the responsibilities of the Public Records Officer.

The Public Records Officer shall oversee compliance with the Public Records Act throughout the City by serving as a point of contact for City staff and members of the public seeking access to public records; however, not every request must be addressed to the Public Records Officer, nor is it intended that every request be reviewed by the Public Records Officer prior to fulfillment. In the interest of providing effective access to public records, the Public Records Officer may designate a Records Liaison to accept and fulfill requests for disclosure of public records on a regular basis.

The Public Records Officer shall distribute updates on laws, legal precedents, and policy changes affecting fulfillment of records requests, as appropriate, and shall approve all forms for requesting and responding to requests of public records.

#### **3.3 Public Records Liaisons**

There shall be a network of Records Liaisons with representatives in every department of the City to assist the public in obtaining access to public records. Each department director shall designate at least one Records Liaison.

Under the oversight of the Public Records Officer, Records Liaisons may accept requests for public records in the possession of their respective departments and may



respond to requestors in accordance with the requirements of state statutes and this policy and procedure.

In consultation with the Public Records Officer, Record Liaisons may communicate directly with requestors, forward requests to other City employees as necessary, compile requested records, and arrange for the supervised public inspection and copying of requested records.

### **3.4 Police Records**

The Police Department is responsible for the coordination, tracking, and fulfillment of requests for police records. The Public Records Officer will serve as an advisor to the Police Records Liaisons but will not provide oversight of the fulfillment process.

### **3.5 Public Records Requests**

The City will honor requests made via mail, email, phone, fax, or in person during the City's normal business hours. No official format is required for making a records request; however, the City strongly encourages requestors to submit requests via the City's online portal available on the City's website or via the public records request form available at the front desk of City Hall. The City will document verbal requests to the extent possible and practicable. The best practice, especially for broad or complicated verbal requests, is for City staff to transcribe the request; ask the requestor to read the request; and have the requestor confirm, in writing with a signature, that the written request accurately captures his or her intent.

Forms for the purpose of requesting public records shall be approved by the Public Records Officer for general use by City staff. These forms shall not be edited for distribution without the approval of the Public Records Officer. As needed, the Public Records Officer may approve alternate request forms that are specialized for request of records with unique statutory considerations, such as law enforcement records.

### **3.6 City Response**

Staff shall respond promptly to requests for public records in accordance with the requirements of RCW 42.56.520 and this policy and procedure. **The deadline for initial response to the records request is five (5) business days after receipt of the request.** Business days do not include weekends and City holidays.

Initial and final responses from staff to official requests for public records shall be made in writing and may be by fax, letter, notation on a request form, or email. Staff may ask for clarification of a request in order to properly identify the records being requested. Clarification of requests may be obtained in writing or verbally.

All requests for public records shall be afforded the same treatment and consideration, without distinction among persons, and without regard to the intent of the request.

To reduce proliferation of paper copies and in the interest of efficiently and expeditiously responding to requests for disclosure of public records, the Public

Records Officer and Records Liaisons are encouraged to use electronic means to respond to, fulfill, and track public records requests.

This policy shall not obligate staff to create electronic or other records, or to convert electronic records into a format or medium in which the records are not already maintained. When asked by a requestor to convert an electronic record into a different format, staff is encouraged to do so when reasonable and technologically feasible, provided such conversion is not unduly burdensome and does not interfere with other essential City functions. Requestors may request paper copies of electronic records subject to applicable copying charges adopted by the City.

In some situation, the City may receive requests for records of a sensitive nature that the City considers disclosable, in all or in part, under the Act. In these situations, the City has discretion to notify the third-party whose interests may be implicated in disclosure to give those persons an opportunity to seek an injunction preventing the disclosure of some or all of the records.

Responses to requests of public records, including responses by email, become public records in their own right, subject to the provisions of the Public Records Act and the retention requirements of the Office of the Secretary of State, and shall be maintained accordingly.

### **3.7 Exemption**

The Public Records Act and other statutes exempt or prohibit disclosure of certain public records. It is the policy of the City of Medina to provide prompt and helpful access to all public records in the City's custody that State statutes do not exempt or prohibit from disclosure. Requested records may only be withheld or redacted consistent with statutory requirements, which shall be documented for the requestor in accordance with the requirements of RCW 42.56.210.

Some public records may contain specific content that is exempt from disclosure. The presence of exempt information does not necessarily exempt an entire record from disclosure. Exempt portions of an otherwise disclosable record shall be redacted prior to inspection or copying and such redactions shall be documented. The requestor shall be notified of the redaction in accordance with the requirements of RCW 42.56.210.

The following are summaries of common exemptions relied upon by the City. Note, the City reserves the right to assert any exemptions permitted by law when the City determines non-disclosure serves the public interest and is not limited to the exemptions listed below:

- 3.7.1** Records that are protected by trade secrets law (RCW 19.108);
- 3.7.2** Valuable formulae, designs, drawings, computer source code or object code, and research data obtained by the City within five years of the request for disclosure when disclosure would produce private gain and public loss (RCW 42.56.270 (1));
- 3.7.3** Personal information in files maintained for council members and City employees to the extent that disclosure would violate their right to privacy, including but not limited to addresses, phone numbers, Social Security

numbers, driver license numbers, voluntary deductions, marriage status, information about dependents, and any garnishment deductions (RCW 42.56.230(3) & .250(3));

- 3.7.4** Preliminary drafts, recommendations, and intra-agency memoranda in which opinions are expressed or policies formulated or recommended, except that a specific record shall not be exempt when publicly cited by the City in connection with any City action (RCW 42.56.280);
- 3.7.5** All applications for public employment, including the names of applicants, resumes, and other related materials submitted with respect to an applicant (RCW 42.56.250(1));
- 3.7.6** Records in investigative files, including police and code enforcement investigations, to the extent that nondisclosure is essential for effective law enforcement or for the protection of any person's right to privacy (RCW 42.56.240(1));
- 3.7.7** Identifying information for victims or witnesses of crimes under certain circumstances (RCW 42.56.240(2) & (5));
- 3.7.8** Records created in anticipation of litigation (RCW 42.56.290); or
- 3.7.9** Records reflecting communications between attorneys and City employees where legal advice is sought or received (RCW 5.60.060(2)).

### **3.8 Broad Requests and Installments**

When a request is received that appears to be broad in nature, staff shall request clarification from the requestor to ensure that the appropriate records are identified. Clarification shall focus on information needed to identify responsive records. Any information provided about the purpose of the request shall not be used as a basis for denying the request.

When appropriate, as part of the clarification process, staff may work with the requestor to find ways to narrow the request. When a requestor agrees to narrow a request, nothing prevents the requestor from later expanding the request back to its original scope.

Large or complex requests may be fulfilled through an installment process as described in this policy and procedure. When installments are provided and are not claimed or inspected, the City may postpone compilation of subsequent installments or treat the request as abandoned and closed.

### **3.09 Internal Review Process**

Any person who objects to the initial denial or partial denial of a records request may petition in writing (including email) to the City Clerk for a review of that decision. Once received, the Public Records Officer will immediately consider the petition and either affirm or reverse their original denial within two business days following the city's receipt of the petition, or within such other time as the city and the petitioner mutually agree to. Any person may obtain review of denials of public records requests pursuant to RCW 42.56.550 from the King County Superior Court, regardless of any internal administrative appeal.

## **4.0 PROCEDURE**

### **2.3 Applicability**

This policy and procedure shall apply to all employees of the City of Medina, the Medina Elected Officials, and all advisory boards and commissions of the City of Medina. This policy does not apply to responses to legal discovery requests governed by State or Federal Rules of Civil Procedure.

### **4.2 Public Records Officer**

The Public Records Officer shall oversee the City's compliance with the Public Records Act and shall serve as primary point of contact for public records access. The Public Records Officer shall have the following responsibilities:

- Oversee compliance with disclosure laws;
- Serve as primary point of contact for the public for access to public records;
- Serve as a single point of contact to coordinate the City's response when a request involves multiple record holders, is broad in scope, or is otherwise complicated to fulfill;
- Direct the public to appropriate Records Liaisons in possession of particular records;
- Serve as a resource to staff on topics related to disclosure of public records;
- Consult with Records Liaisons and other staff about fulfillment of records requests;
- Approve forms for use in processing records requests;
- Disseminate legal updates and policy changes affecting records requests;
- Collect and analyze relevant information related to the City's performance of public records disclosure; and
- Maintain the City of Medina Public Records webpage.

### **4.3 Form of Request**

It is recommended that public records requests be made in writing using the City's approved submittal form. Requests shall include, at a minimum, the following information:

- An indication that the request is being made for access to a public record pursuant to the Public Records Act;
- The requestor's name, address, and convenient means of contact such as email address, phone number, fax, etc.;
- The date of the request;
- A description of records requested sufficient to identify the records; and
- Whether the requestor wants to inspect records or wants copies.

When paper copies are requested, the requestor should indicate if they wish to be contacted by the City if copy costs will exceed twenty dollars (\$20.00).

Written requests submitted by mail, email, fax, personal delivery, or other means should include a completed request form. When a written request is received that does not include a completed request form or the information listed above, staff may ask the requestor to complete and submit a form to obtain information needed to identify records or respond effectively. In cases where a requestor refuses to submit a request form, staff shall transcribe the request for the requestor, ask the requestor to verify in writing that it correctly memorializes the request, and consult with the Public Records Officer to ensure an appropriate response.

### **Receipt by Staff**

Records requests may be accepted by any department staff person under the general direction of the Public Records Officer. Such requests shall be receipt stamped or dated on the face of the request and forwarded to the Public Records Officer by electronic means.

### **Unnoticed Requests**

It is the requestor's obligation to provide the City with fair notice that a Public Records Act request has been made. When a requestor does not use an official request form, or makes a request to an employee who is not a Records Liaison or the Public Records Officer, or includes a request as part of other documents provided to the City for reasons other than making a Public Records Act request, the requestor may not be providing fair notice to the City. To ensure fair notice is provided, requestors are encouraged to use official forms, make the request through the Clerk's office, and/or take other steps to clearly identify their request. For example, when a request is submitted with other documents not related to disclosure of public records, it shall be the responsibility of the requestor to provide reasonable notice that a public records request is included.

### **Lists of Individuals**

Requests for public records that include lists of individuals require a signed certification by the requestor that such lists shall not be used for commercial purposes. A certification provision is included on the City's official records request form. The Public Records Officer may do research to confirm that the request is not for commercial purposes.

## **5.0 FEES**

Copies are available at a cost of 15 cents per page or as otherwise set forth on the Public Records Request section of the City's master fee schedule. The City's fee schedule includes statutory default costs under RCW 42.56.120. The City adopted a finding that it would be unduly burdensome to calculate actual costs in Resolution No. 406, thereby authorizing it to impose statutory default fees. The City will waive fees when it provides case reports and other Police Department records documenting criminal incidents to the victim of a crime documented in the records.

In addition to the fees set forth in its fee schedule, the City may impose a customized service charge if the City reasonably estimates that responding to the request will require special information technology expertise to prepare data compilations or provide

customized electronic access services, provided that the information technology expertise will not provide a service that the City would also use for other purposes. The customized service charge cannot exceed the actual cost to the City of the services, and the City must provide notice to the requestor before imposing the charge that explains the reasons for imposing the charge, the specific services provided, and the estimated amount of the charge. The notice must also give the requestor an opportunity to modify his or her request to avoid the charge.

A requestor may ask for a summary of applicable charges before any copies are made or produced. If asked, the City must provide such a summary, and must provide the requestor an opportunity to revise his or her request to avoid applicable charges.

The City may, at its discretion, require the requestor to deposit a sum in an amount not to exceed 10 percent of the estimated cost of providing copies for a request, including any applicable customized service charge. If the records are made available on a partial or installment basis, the City may charge for each part of the request as it is provided. If an installment of a records request is not paid for or reviewed within 30 days after the City provides notice of availability of the installment, the City is not obligated to fulfill the balance of the request. In addition, a requestor must prepay the estimated copy cost for any copies that must be made by an outside vendor. As copying facilities and the City's files are located in an "Employee Only" area of City Hall, for security purposes and to avoid unreasonable disruption of operations, the City cannot offer these facilities for public use.

## **6.0 REFERENCES**

Chapter 42.56 RCW  
Chapter 40.14 RCW  
Chapter 82.12 RCW  
Chapter 44.14 WAC  
Chapter 434-615 WAC  
Washington State Local Government Common Records Retention Schedule

## **7.0 GENERAL DUTY**

It is expressly the purpose of this policy to provide for and promote the health, safety and welfare of the general public and not to create or otherwise establish or designate any particular class or group of persons who will or should be especially protected or benefited by the terms of this policy. It is the specific intent of this policy that no provision nor any term used in this policy is intended to impose any duty whatsoever upon the City or any of its officers or employees. Nothing contained in this policy is intended nor shall be construed to create or form the basis of any liability on the part of the City, or its officers, employees or agents, for any injury or damage resulting from any action or inaction on the part of the City related in any manner to the enforcement of this policy by its officers, employees or agents.

## **8.0 CORRECTIONS**

The City Clerk is authorized to make necessary corrections to this policy including, but not limited to, the correction of scrivener's/clerical errors, references, numbering, sections/subsection numbers and any references thereto.

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