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SOCIAL MEDIA RECORDS MANAGEMENT POLICY AND GUIDELINES

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Introduction

Social media refers to electronic communications through public-facing platforms that allow users to create and share content such as textual information, message, videos, images, etc., and participate in networking and social communities.

Saskatchewan government institutions use social media applications and platforms on a daily basis for informational and promotional purposes. Government institutions are accountable for the public (official) records they generate or receive using social media. Government institutions must ensure that these records are managed in compliance with *The Archives and Public Records Management Act (APRMA)*.

In accordance with *APRMA,* Government institutions are responsible for capturing and retaining public records in a useable and accessible format. In addition, any public records including those generated via social media are subject to the records disposal process administered by the Provincial Archives. This social media policy and guideline assists government institutions in fulfilling their responsibilities as per the APRMA.

This document applies to all media formats including, but not limited to text, images, video, audio and interactive dialogues posted to any social media platforms such as: Facebook, YouTube, blogs, wikis, discussion forums, etc.

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<u>Social Media Records Management Policy</u>

<u>Purpose</u>
The purpose of this policy is to specify the records management requirements for all Saskatchewan government institutions that use social media.

<u>Policy</u>
It is the responsibility of all Saskatchewan government institutions to capture and maintain, an official version of posted social media content within the institution's official records keeping system. Content posted on the social media platform is considered a "copy" and not the public record itself and therefore is not subject to *APRMA*. The institution must determine if any feedback, comments, etc., related to posted content meet the definition of a public record and arerequired to be captured and retained in the official records keeping system. Any associated metadata (date posted, author, social media tool used, url, date of capture, etc.) must also be kept with the record.

To manage the official version of posted social media content in accordance with *APRMA*, government institutions must retain and dispose of records in accordance with approved records schedules[1] (ARMS, ORS or a comprehensive schedule) and develop related internal policies and procedures. Government institutions are responsible for their official public records throughout the records' life cycle and must manage them in a manner that ensures records are accessible, legible, usable, transferable, and guarantees their authenticity and integrity.

<u>Scope/Applicability</u>
This policy applies to all Government of Saskatchewan institutions and other government bodies subject to APRMA. This policy solely addresses records and information management (RIM) requirements for social media and should be used in conjunction with the Government of Saskatchewan's "Social Media Policy and Guidelines", the Archives "Saskatchewan Records Management Policy", and the following Social Media Records Management Guidelines.

<u>Authority</u>
The Provincial Archivist of Saskatchewan has issued this policy in accordance with s.18(2)(e) of The Archives and Public Records Management Act.

<u>Accountability</u>
Heads of government institutions are responsible for compliance with this policy.

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[1] All records schedules in Saskatchewan Government must be approved by the Public Records committee (PRC) to be official policies governing records retention and disposal

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<u>Social Media Records Management Guidelines</u>

<u>Identifying social media records that are public records</u>

A "public record" means the "official record" made or received by a government institution in carrying out its business transactions and operations.

All government institutions that use social media need to identify what social media interactions are public records and to capture them appropriately. The context and purpose of social media communication will determine if any public comments or other interactions would also be considered part of the public record. Once the institution identifies and captures the public record, the copy that resides on a social media platform can be considered transitory and is not subject to the APRMA retention and disposal requirements.

A table in appendix A provides some basic guidance on how to identify social media content that is a public record.

For information on transitory records and how to identify them refer to the *Guidelines for the Management of Transitory Records*.

Comments and determining if they are records

Not all comments added to social media posts are public records. Comments or interactions that should be captured as public records along with the posts include those that:

- Provide solicited feedback,
- Require a response from the government,
- Contain threats or any other misconduct that may require further action, OR
- Represent other significant interactions between the government and public.

Comments added to government social media posts that do not relate to government business are not public records. These comments can be deleted at the discretion of the government institution.

Government institutions should develop internal polices and procedures addressing how inquiries received through social media should be handled, including when the responses should occur outside of social media channels (e.g., phone or email follow-up). There should also be policies and procedures in place to address comments made by the public that may include PI or PHI.

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Capturing social media records

To effectively capture social media records institutions must employ a consistent approach as to how, when, and which records to capture. Collaboration with IT is critical to ensure the best methods and tools are used for the capture and retention of the records.

Institutions can choose to capture the official version of posted social media content before or after it is published online. In either case, it is crucial that the complete record is captured, with all relevant metadata, for both postings of one-way communications and those intended to generate interactive content (e.g. soliciting comment, feedback from clients/stakeholders on government programs and/or services). Government institutions should monitor original social media postings after publication and regularly import public records to their recordkeeping system so that a complete record is preserved.

Internal policy should be in place which dictates when old posts will no longer be monitored/maintained with new comments and interactions not being responded too. These policies should be developed in consultation with an institution's social media coordinators, privacy, records management, and IT services.

Ideally, social media records should be retained and managed in their electronic format. Institutions should work with their IT service provider to determine the best method of capturing complete social media records. Depending on their resources and IT capabilities institutions may consider deploying purpose-built software applications such as a Electronic Document and Records Management Systems (EDRMS), or using capabilities in existing records keeping systems.

Until they are captured in an official record keeping system, the official copy of all comments on government posted content will reside on the social media platform. Government institutions need clear internal procedures on the regular capture of these comments to prevent their loss.

Social media and records management challenges

Control over Information
Social media by its very design fosters redistribution of information. It's inevitable that government institutions will lose control over how their social media posts are used and where copies reside. Therefore, government institutions need to evaluate potential risks associated with having copies of content on social media platforms out of government control and weigh those risks against business needs. No information that could harm the government's reputation or operations should be posted by government institutions.

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Account and site shutdowns

Periodically there will be either the need for a government institution to shut down a social media feed, or a social media service shuts down, requiring all government records to be captured before government records are lost. While there should be policies in place to make sure that the records are continually captured, its important to make sure that social media posts, like all other digital records, have a proper migration plan in place.

Additional Challenges

Government institutions also face a number of other challenges associated with creating and posting social media records, some of them are:
- performing efficient recordkeeping in a dynamic environment;
- managing information residing in multiple locations;
- capturing complete records, some created through collaborative activities;
- managing comments containing personal or personal health information;
- applying appropriate retention and conducting timely disposal;
- ensuring the authenticity and integrity of records;
- achieving timely and complete responses to FOI and legal discovery requests;
- transferring records to an internal recordkeeping system and deleting records permanently from a social media platform
- Ensuring copyright and privacy compliance for posted material.

How to address the challenges

Many of these challenges can be mitigated by identifying and addressing records management concerns as part of the set-up process when creating new social media accounts.

By applying a consistent and standard approach to managing social media records, government institutions can address records management challenges by taking the following measures:
- establishing and maintaining institution-wide policies and standards compliant with the requirements of the APRMA
- engaging in ongoing consultations with key stakeholders across the institution (e.g. records co-ordinators, privacy officers, IT staff, legal counsel, security officers) to ensure that policies are met and concerns are addressed
- providing up-to-date training and ongoing communication to staff on records management policies, procedures, and processes.
- ensuring confidential, personal, or personal health information is not included in social media content posted by government institutions.
  - all posts should be assessed in accordance with internal procedures before they are uploaded to ensure that this information is not included, and

- o in situations where this information is uploaded, or added to a post through edits or comments, the information should be removed as quickly as possible.
  - o if an inquiry containing this information is received via a comment, the commentator should be advised to use an alternative channel where the information can be securely handled and the comment should be removed from the post.
- classifying and retaining social media records according to an approved classification and retention schedule (*ARMS2014*, operational schedules or comprehensive, corporate-wide schedules);
- determining which records meet the definition of public record when deciding on social media content to be posted or captured;
- establishing standard records and information management practices and conventions that facilitate the identification and retrieval of records;
- using schedules to initiate the regular disposal of social media records in accordance with *APRMA*

It is important that government institutions clearly identify the roles and responsibilities of those involved in creating, approving and monitoring the institution's social media content.

Furthermore, due to the ever changing nature of Social Media sites, existing accounts should be periodically audited to make sure that current records management procedures are suitable, and that the accounts still comply with current policies.

Disposal of social media records

Disposition refers to the authorized destruction or transfer of public records to the permanent collection of the Provincial Archives. *APRMA* prohibits the destruction of public records without an approved records schedule and the permission of the Provincial Archivist. Social media records that are public records are subject to the disposal process managed by the Archives.

Transitory copies of social media posts that are in government control can be destroyed as per internal procedures, provided the official version been properly captured. Transitory copies should not be kept after the official version of posted social media content of the post has been disposed of.

For definitions of the records management terminology in this document please see the Glossary of Records Management Terms

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Appendix A

Determining if Social Media Content is an Official Record
The table below provides some basic guidance on the types of social media content that should be captured and managed in a recordkeeping system. These are only examples of what your institution may need to capture, they are not inclusive and there **might be exceptions** (particularly if promotional activities are conducted via social media then those records need to be captured in the internal recordkeeping system).

Examples		Capture	
		Yes	**No**
Content related to service delivery, recommendations, and public statements	Social media postings used to advise the public about potential traffic hazards, for example, a series of postings by the *Ministry of Highways* regarding the closure of highways, provision of alternate routes, and the reasons for the closures. Includes a link to full construction updates for all other highway construction work going on across the province.	X	
Content related to public consultation exercises	Social media postings from the *Ministry of Parks, Culture and Sport* soliciting the views from the general public regarding proposed changes to an on-line campground booking service and information about how the data will be used.	X	
Content providing formal, official government advice or guidance generated in response to an individual inquiry where the information may benefit other members of the public	A series of postings on Facebook (both inbound and outbound) by the *Ministry of Health* providing public health bulletins, questions from the public, and responses from government officials related to a particular health crisis.	X	
Content that triggers an internal process, such as a request for information, a complaint or a threat	Inbound postings to the *Ministry of Highways and Infrastructure* from members of the public alerting the ministry about a potential road erosion hazard caused by flooding. Includes photographs and land location data.	X	
Content that directly links to or shares previously posted content from other government websites or social media accounts	Re-blogs of other government institutions social medias posts or links directly to other social media posts/channels from your institution. SaskJobs posting a link on Facebook to an article on their website.		X

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	The Ministry of Agriculture postings of up-to-date information about the state of the annual harvest. Includes a link to the Ministry's website for a more comprehensive report.		
Content not related to the business of the institution such as fun facts, stories or photos; generic comments on trending events or issues	Postings by Wascana Center Authority about the renovation of the legislative building and how long its been since that happened. SaskEnergy posting about a duck nesting and hatching its ducklings nearby one of it's offices		X
Auto-generated posts based on account changes	EHealth updating its profile picture on Facebook, and Facebook autogenerating a post related to that change		X
Friendly reminders,'good luck' or 'congratulations' messages	Facebook posts from the Provincial Archives congratulating staff members on receiving awards.		X

Glossary of Terms

Refer to the *Glossary of Records Management Terms* for the Glossary for Terms
https://www.saskarchives.com/sites/default/files/pdf/glossaryofrmterms_fin_jan2023.pdf

Related Documents

Electronic Records Guidelines
https://www.saskarchives.com/sites/default/files/pdf/elec_rec_guide_fin.pdf

Social Media Guidelines
https://taskroom.sp.saskatchewan.ca/Documents/Social-Media-Guidelines.pdf

Saskatchewan Records Management Policy
https://www.saskarchives.com/sites/default/files/pdf/pas_rm_policy_fin.pdf