



SOCIAL MEDIA & RECORDS MANAGEMENT GUIDELINES

Introduction

Records are an "institutional memory" and are necessary for decision making and policy development. They are also required for legislative compliance, for meeting fiscal and legal requirements, for program implementation, and for almost every aspect of day-to-day office work. Government institutions must ensure that accurate and complete records of all government business are created and retained in a useable and accessible form for as long as they are required to support mandated business functions, activities, and transactions in compliance with *The Archives and Public Records Management Act*.

In keeping with the above, it is essential that an enterprise approach be developed and adopted for managing social media records across government. Government social media records constitute vital components of the documentary record of Saskatchewan. In order to understand fully the role of governments in the 21st century, future generations will need to have access to preserved government records of historical significance, including those created through social media interactions.

Social media includes, but is not limited to, blogs and micro blogs (e.g. Twitter), social networking sites (e.g. Facebook), content communities (e.g. YouTube), and collaborative sites (e.g. Wikipedia). Government (public) records placed on a social media platform are subject to the same records management and disposal requirements as all other government records.

Executive Council has an established policy that governs broadly the participation on social media by employees of the Government of Saskatchewan and its ministries (Government of Saskatchewan, "*Policy and Guidelines for Citizen Engagement*"), commonly referred to as the rules of engagement.

The information in this guide is related strictly to the records management aspect of social media. The guide provides basic advice on how to comply with the Provincial Archives of Saskatchewan's policy document, "*Social Media and Records Management Policy*".

Identifying social media records that are government (public) records

The onus is on government institutions to identify government records of social media interactions and to ensure that these records are managed appropriately. Government institutions must distinguish between government records and non-government records in the context of their social media interactions. The purpose for the posting(s), along with the content, determines whether or not they are government records.

Government Records are all recorded information that relate to the transaction of government business, **regardless of physical form**, including documents, maps, electronic records, e-mail, drawings, photographs, letters, vouchers, papers, etc., which are received, created, deposited or held by a ministry, agency, board, commission, crown corporation or other institution of the Government of Saskatchewan.

Government (public) records are those that are required by a public body to control, support or document the delivery of programs, to carry out operations, to make decisions or to account for activities of government. A copy of these records must be designated as official and be classified, filed,

retained, and disposed of according to an approved records schedule and internal records management policies of the institution, consistent with *The Archives and Public Records Management Act*.

Government institutions must ensure the official copies of social media interactions become part of, and are retained within, the **institution’s internal recordkeeping system** (e.g. electronic records management system or business system with adequate records management functionality) and must be integrated with other records management practices for records in the custody or under the control of the institution.

Transitory records are postings of temporary usefulness that are needed only for a limited period of time or to provide routine information. Non-government records are postings that do not pertain to any aspect of government business nor relate to an employee’s position within the organization. Transitory and non-government social media records do not need to be managed in the institution’s recordkeeping system and their destruction does not require approval of the Provincial Archivist. These types of social media records should be destroyed when no longer required.

The table below provides some basic guidance on the types of social media content that should be captured and managed in a recordkeeping system:

Example		Capture	
		Yes (government record)	No (transitory; non-government)
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 <i>Ministry of Highways</i> 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 <i>Ministry of Parks, Culture and Sport</i> 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 in response to a query	A series of postings on Twitter and Facebook (both inbound and outbound) by the <i>Ministry of Health</i> providing public health bulletins, questions from the public, and responses from government officials related to a particular health crisis.	X	



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Example		Capture	
		Yes (government record)	No (transitory; non-government)
Content that triggers an internal process, such as a request for information, a complaint or a threat	Inbound postings to the <i>Ministry of Highways and Infrastructure</i> 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 provides or points out to or is a copy of information available elsewhere	The <i>Ministry of Agriculture</i> postings of up-to-date information about the state of the annual harvest. Includes a link to more comprehensive reports for public consumption.		X
Content about non-business-related matters and/or designed solely to build user engagement (fun facts, stories or photos; generic comments on trending events or issues)	A number of postings by <i>Tourism Saskatchewan</i> providing information about restoration work taking place at the Legislative Building and a link to a television news story about the project.		X
Handy hints or tips about how to access or use a government service	Government postings aimed at the student community directing them to a link with information about summer jobs and access to job applications.		X
Advertising material, invitations, friendly reminders, 'good luck' or 'congratulations' messages	Social media postings inviting the general public to a seasonal Halloween event taking place at Government House and including date and time.		X

Social media and records management challenges

Government institutions face a number of challenges associated with creating and posting social media records such as:

- performing efficient recordkeeping in a dynamic environment;
- managing information residing in multiple locations;
- capturing complete records, some created through collaborative activities, and others frequently updated;
- protecting records containing personal and confidential 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;

- exercising control over records residing with third party service providers.

How to address the challenges

To ensure a consistent and standard approach to managing social media records, government institutions can address their challenges by applying consistently the following measures:

- establishing institution-wide records management standards consistent with the Archives' requirements and maintaining these through on-going liaisons with key stakeholders across the institution (e.g. records co-ordinators, privacy officers, IT staff, legal counsel, security officers);
- communicating to all staff up-to-date records management policies, procedures, and processes;
- identifying all the elements that constitute a complete social media record and associated metadata;
- assessing social media content prior to use of social media to ensure no information is communicated that contains private, confidential, or sensitive personal or health information;
- classifying and retaining social media records according to an approved classification and retention schedule (*ARMS 2014*, operational schedules or comprehensive, corporate-wide schedules);
- determining which records meet the definition of government record when deciding on social media content to be posted or generated;
- establishing standard records and information management practices and conventions that facilitate the identification and retrieval of all records relevant to specific information requests;
- using schedules to retain official social media records internally and initiate regular disposal of social media records in accordance with *The Archives and Public Records Management Act*;
- negotiating comprehensive terms of service agreements that include capture, export, and access controls that meet records and information management requirements.

Options for capturing social media records

The effective capture of social media records require that institutions commit to a consistent approach towards what records to capture, when to capture them, and how to capture them.

In terms of what to capture, social media content that qualifies as a government record must be captured in an internal recordkeeping system as the official record. The record that resides on a social media platform is a copy.

In terms of when to capture content, institutions need to determine the best time to import social media content into their recordkeeping system. Institutions can choose to either capture content before it is published online or after the content has been posted to the platform. In either case, it is crucial that complete records be 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 need to monitor original social media postings after publication and import to their recordkeeping system ongoing updates, follow-up, comments and/or feedback and ensure that all relevant content is being captured and preserved as a complete record.

Ideally, social media records should be retained and managed in their electronic format. In terms of methods of social media capture, there are three options available to government institutions;

- deploying purpose-built software applications such as Electronic Document and Records Management Systems (EDRMS)
- using existing electronic file management and/or other business systems; or
- copying, printing and filing content to existing recordkeeping systems

Whichever option is chosen, staff needs to be aware of how social media is captured and if necessary, undergo training to ensure consistent and standard methods, tools, and processes are used for the capture of complete social media records and associated metadata.

Option #1 - Electronic Document and Records Management Systems (EDRMS)

The most reliable and comprehensive way to ensure electronic records are properly managed as digital records is through the deployment of an Electronic Document and Records Management System (EDRMS). An EDRMS is a software application that manages a range of digital information, including emails, spreadsheets, word processing documents, digital images, etc. Acquiring and configuring an EDRMS to suit the business needs of an institution is the best option. Such a system permits an institution to retain e-records for the length of time required by a schedule, manage records as reliable and authentic evidence of official business, and protect them from inadvertent access or disposal.

Option #2 – Other electronic file management and/or business systems

In the absence of an EDRMS, government institutions can use existing internal electronic file structures or other business systems to capture and manage social media records. These systems must have reliable and adequate recordkeeping functionality. A government institution-hosted tool may be a viable option but requires training for applicable staff, capture strategies and in-house application development to capture electronically social media records. Institutions with the capability to capture social media interactions in e-records systems need to consider strategies for their maintenance, preservation, access, disposal or transfer to the Archives. To be a viable solution, government institutions need to develop and implement procedures to protect the integrity and security of social media records. Institutions need to devise processes to ensure records are usable, legible and accessible for the length of retention period assigned and can be disposed of when no longer required. Active and ongoing management is necessary to keep on top of particular issues such as longevity of file formats used; storage media lifespan and obsolescence; and maintaining the integrity of data over time.

Some government institutions might resort to engaging third-party service providers to capture and manage their social media content. If so, institutions need to be aware of issues such as: control of information; retention of content for the prescribed period; removal/disposal of postings and information; timely responses to requests for information; protection of privacy; and protection against misuse or posting of inaccurate content, etc.. It should be established that the site provider is able to; i) accommodate classification to approved record schedules; ii) retain the information for the required retention period; and, iii) dispose of the information when retention period is met. The disposal of social media records must be carried out in accordance with an approved retention schedule and the terms of

The Archives and Public Records Management Act. Government institutions need to work in close and on-going partnership with third-party service providers to negotiate terms of services that incorporate adequate recordkeeping requirements.

Option #3 - Print and File

A third option is to print and file social media records into the existing hardcopy records management system. This solution is very challenging (given the dynamic, interactive quality of social media records), but necessary if an institution lacks recordkeeping systems that can support the capture of digital-born records.

Disposal of social media records

Disposition is the authorized destruction or transfer of official government records to the permanent collection of the Provincial Archives. This process is applicable to government records in all formats. A crucial aspect of managing social media records is their association with approved records schedules and appropriate disposal as government records.

All official government records must be retained by the responsible government institution for the length of time designated in an applicable records schedule. Once the retention periods established in these schedules are met, official records must be disposed of using the procedures set out by the Provincial Archives of Saskatchewan.

Once official social media records have met the required retention period all known existing copies should be included in the disposal process. Of course, once social media content has been posted to the internet, it may not be in the institution's power to locate and retrieve all copies for disposal. The institutions will lose control over how this content is used and where copies reside. Therefore, government institutions need to assess the business requirements and evaluate potential risks associated with having copies of content on social media platforms out of government control. Government institutions should be aware of the risks posed by posting certain content and ensure no information is posted that could harm the government's reputation or operations in the future.

Government institutions must ensure the disposal of official records is carried out in accordance with the disposal process. *The Archives and Public Records Management Act* prohibits the destruction of government (public) records without the permission of the Provincial Archivist. The final responsibility for the ownership, management, and eventual disposal of social media content that is the official government record rests with the government institution posting the social media content.

Responsibilities

It is important that government institutions identify the roles and responsibilities of those involved in creating, approving and monitoring the institution's social media content in relation to records management policies and procedures.

Executive Management (e.g. Deputy Ministers, Presidents, Chief Executive Officers, Assistant Deputy Ministers, Executive Directors, etc.), Program Managers, Designated Records Officers (DROs), Records Managers and all other staff have roles to play in ensuring records generated through social media interactions are:

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- addressed consistently as the output of official social media use;
- managed appropriately as evidence of the institution's functions and mandate;
- reflective of program information delivery and stakeholder engagement;
- identified accurately as government (public) and non-government records;
- retained for the appropriate length of time and disposed of in a timely manner; and,
- managed as a part of an institution-wide, comprehensive records management culture.

Effective management of records of government social media interactions is essential to preserve evidence of government activity for present and future generations.

Glossary of Terms

Authenticity - to prove the authenticity or genuineness of a record, government institutions must show that the record is what it purports to be; that it actually comes from the person, organization or other legal entity claiming to be its author or authorizing authority. To provide for authenticity, adequate controls are necessary to ensure that the creator of an electronic record is identified and authorized.

Government Institution - for the purposes of this policy, a government institution should be taken to mean any entity that creates and maintains public records as defined by *The Archives and Public Records Management Act*.

Government (Public) Record - all recorded information that relates to the transaction of government business, regardless of physical form, including documents, maps, electronic records, e-mail, drawings, photographs, letters, vouchers, papers, etc. which are created, received, deposited or held by an office of the Government of Saskatchewan.

Integrity - to prove the integrity of a record, government institutions must show that the record is reliable and trustworthy. Electronic records provisions of *The Evidence Act* state that where the best evidence rule applies to an electronic record, it is satisfied by proof of the integrity of the system that recorded and/or stored the record. Therefore, it is necessary to demonstrate that the system operates effectively and that measures are in place to prevent accidental or deliberate alteration to documents recorded by and/or stored in it.

Non-government Record – records that do not fall within the definition of government (public) records. Such records include external publications and non-work-related records.

Official Record – the official copy of a government record (public) that is retained within a government institution for legal, fiscal, operational or historical purposes. It exists to fulfill long-term financial, legal and/or audit requirements. It can be the original and only copy of the record or a replacement copy that is designated as official. Only the official copy of a public record must be classified, retained and disposed of as per the terms of the applicable records retention schedule.

Public Record: See Government (Public) Record

Social Media - refers to publicly-accessible Government of Saskatchewan and third-party-hosted social media sites (including social networks, video and photo-file sharing, social bookmarking, blogs, micro-blogs, podcasting, wikis etc.,) used to provide information on, and to promote awareness of, its programs and services; to provide client services; to enhance the profile of government services in the public domain; to increase traffic to a website; to invite collaboration; to obtain feedback; or, to network.

Transitory Record - are records of temporary usefulness that are needed only for a limited period of time, to complete a routine task or prepare an ongoing document. Also, exact copies of official records made for convenience of reference. For further information, please see the *Guidelines for the Management of Transitory Records*