

# Government of Alberta Social Media–Web 2.0 Policy

## Background

The Government of Alberta's (GoA) official presence on some social media sites contributes in an official capacity to discussions on GoA programs and services.

This policy refers to freely accessible online (social media or web 2.0) tools used to produce, post and interact using text, images, video, and audio to communicate, share, collaborate, or network. This includes blogs, social networks, videos and photos file sharing, folksonomic tagging, podcasting and vodcasting, wikis and other similar tools. For the purposes of this policy, social media refers to public-facing GoA and third-party-hosted sites.

## Purpose

The purpose of this policy is to set out direction and requirements which must be followed as the GoA participates in the social media realm.

The scope of this policy includes all Ministries within the Government of Alberta including all employees, contractors and agents. It also includes any Agencies affiliated with any of the Ministries that the respective Minister or Deputy Minister deems to be subject to this policy.

## Policy

### GoA Use of Social Media

The GoA supports the use of social media for informational and promotional purposes. GoA programs, facilities and sites are permitted to have an official presence on third party social media sites provided they adequately consider how their program and communications plan objectives will be met, understand the broader implications and risks in using social media generally and the identified social media sites specifically, and the responsible ADM and Communications Director have approved the initiative or plan.

### GoA Employee Use of Social Media – as an authorized spokesperson

Just like in dealing with traditional media (ref. GoA Communications Policy), some GoA employees will be deemed as a ministry spokesperson with the role of contributing to social media discussions. These individuals will be named in collaboration with Communications and prior to engaging in social media, these individuals will receive training on how to represent the GoA in the online domain. This includes ensuring that only official GoA positions are conveyed – not an individual's personal views. Contractors or agents may also be appointed to social media projects and the same guidelines apply.

Regardless of the media being used, GoA employees must not do anything that could harm the reputation of the Government of Alberta. They must ensure that any comment on matters of government policy is appropriate to their employee role and must respect the need to maintain politically neutral GoA services.

## GoA Employee Use of Social Media – as a private citizen

In their capacity as private citizens, GoA employees have the same rights of free speech as other citizens, however they may not represent the Government of Alberta on their own personal social media sites, and they are reminded that they are bound by the official Oath of Confidentiality, the Code of Conduct, the Communications policy, the Freedom of Information and Protection of Privacy Act and the Internet and Email Use policy and must not disclose any GoA information or content that they are not specifically authorized to disclose.

Acting as a private citizen, a GoA employee must use a private email address and make every reasonable effort to make it clear that their contribution to social media sites is as a private individual, and not as a representative of the GoA.

## Definitions of terms

**Official presence** – A dedicated page or channel on a social media site that has the official Government of Alberta logo and is used for the purpose of informing or communicating with citizens or visitors concerning a Ministry programs, facilities or sites.

**Personal information** – Information about an identifiable individual. In a social media context this would include the individual’s name and other information such as their email address or username if it includes the individual’s name, a portion of their name, or is otherwise identifying in nature (e.g. john.doe, jdoe, doejohn, etc) or is a pseudonym (e.g. moutainbiker12) that is attributable to an identifiable individual by using other readily available information.

- **Non-identifying or individual anonymous** information is information about a specific individual but the identity of the individual is not known, and cannot easily become known by accessing other readily available information - this is not personal information.
- **Aggregate, statistical or anonymous information** is information about groups of people or about specific individuals who are not and cannot be identified – this is not personal information.

**Published information** – Personal commentary or other information or content posted to a web site that is intended to be accessible to a wide community of followers or the public at large without the need for, or reasonable expectation of, direct or indirect familiarity, association or relationship (e.g. weblog or “blog” postings and comments). This does not include information posted to personal online diaries or information intended or believed to be communicated only between known “friends” or a broader, but still limited, circle of acquaintances.

**User-created content (UCC)** – Comments, ratings, reviews, tags, opinions or responses provided by an individual or a group on a social media site concerning content posted on the site, or a topical issue, or the individual’s original non-professional creative or modified content that has been posted or published to a site. This type of content is also known as user-generated content (UGC) or consumer-generated media.

# Government of Alberta Social Media–Web 2.0 appendix to the policy

## Issues and risks to consider

Some issues that need to be taken into account include public relations and operational risks, IMT (Information Management and Technology including records management and security), FOIP, privacy and legal (copyright, intellectual property rights, liability and others).

## Public Relations and operational risks:

When planning to use a social media channel to communicate, ministries must consider:

- the program's communications plan or marketing objectives and alignment with the GoA Communications Policy;
- the reputation and ability of the social media channel site(s) to reach the target or intended audience;
- whether the terms of use of the social media channel site(s) will achieve the ministry goals (e.g. to establish a legitimate organizational presence);
- the appropriateness of posting the intended ministry content to the site;
- the GoA's content moderation policy ("Terms of Engagement"); the approach to be used and the moderator tools provided by the social media platform;
- the date or criteria (e.g., after certain period of inactivity) upon which the content and use of the site will be reviewed or discontinued/removed; and
- risks and issues regarding Public Relations (reputation), Information Management and Technology, FOIP, privacy, legal (liability, protection of copyright and intellectual property) that may be incurred by GoA and users accessing the social media channel site;
- that GoA images, video and other content posted to social media sites can and, likely will be, downloaded and re-used in other ways on other sites, altered or re-posted to the same or other sites, GoA will ensure this risk is acceptable for all content posted to these sites; and
- Albertans and visitors have the means to readily and easily access necessary and important information regarding GoA programs, sites, facilities, services and policies, without a need to register as a user of a social media site. For example, GoA information is directly accessible to unregistered users of a social media site and/or this information is also available on a GoA website, or via other channels.

In reviewing and approving the plan, the responsible ADM and Communications Director must ensure requirements of this policy will be met and should seek the input or advice of representatives from IMT (Information Management Technology), GOA FOIP and Legislative Review.

GoA will post, monitor, respond, contribute to or seek to influence social media conversations, in a manner that is identifiable as being made by or on behalf of GoA by authorized spokespeople.

Authorized spokespeople must ensure all content posted on GoA social media channel

- is consistent with the initiative or plan approved by the ADM and Communications Director; and
- is either 'unrestricted' information that is appropriate for routine public dissemination or is 'protected' information that has been approved for publication or dissemination by the applicable information controller or ADM.

Authorized spokespeople must monitor the GoA social media channel and

- review all user-created content before it is posted to the public facing social media channel site, if the social media tool allows, or as soon as possible after it is posted;
- where possible, modify display settings so that user-created content is off the primary landing page; and
- apply established and posted or linked GoA rules of engagement or participation standards, with respect to abusive, hateful, defamatory, anonymous and other inappropriate comments or content, including information that jeopardizes the privacy of others.

Authorized spokespeople responding to content on a GoA social media channel or contributing on behalf of the Government of Alberta to other pages or sites

- must identify themselves as a GoA spokesperson (name and ministry);
- must ensure their responses are consistent with messaging approved by the Communications Branch, with actual wording being consistent with the audience or objectives of the site; and
- are bound by this policy, the Oath of Confidentiality, the Code of Conduct/ Supplementary Code of Conduct, the FOIP Act and the provisions of the GoA Internet and Email Use Policy.

### **Legal liability, copyright, and intellectual property**

Any content placed upon social media sites should be GoA-owned or if licensed to the GoA, should contain provisions which would allow the GoA to provide worldwide, fee-free, non-exclusive licenses to third parties in perpetuity.

Artists or named personnel whose works may be posted to social media sites must be informed of this possibility so that they may waive their moral rights.

### **(IMT) Information management and technology including records management and security**

Content posted by GoA or a member of the public to a third party social media site is managed entirely by the site operator according to its established terms of use.

A record of all substantive content (e.g. text, images, video, and documents) posted by GoA employees or agents to a GoA social media channel or other site and moderating activities and response must be maintained by the Business Unit/Facility in the ministry's official recordkeeping system, as per GoA and the ministry's policies and processes for the management of electronic records and media, and scheduled for retention/disposition.

## FOIP/privacy

Given privacy risks, the GoA has to consider a number of issues when participating on social media sites.

- GoA will only create official social media channels that have a privacy policy or statement and reputation that is reasonably consistent with the Fair Information Practices reflected in both Alberta FOIP and PIPA legislation.
- GoA will promote the protection of citizens' and visitors' privacy by including in its content links to GoA/Information and Privacy Commissioner (IPC) or other information about how to protect one's privacy when using social media.
- GoA will use available web tools or services to obtain non-identifying anonymous, aggregate or statistical information concerning its programs, services or marketing efforts from social media sites.
- While GoA may scan or monitor published information available on social media sites, it will not seek to obtain or collect an identifiable individual's personal views, actions, or comments or take steps to identify the specific author or contributor of unpublished information or content unless authorized or permitted by law to do so.

The GoA will only advertise its programs and services on social media sites in a responsible manner in accordance with the GoA Communications Policy. If any official GoA content includes personal information, the use and disclosure of that personal information must be permitted under the FOIP Act. The GoA will not collect personal information about individuals who are registered with these sites unless it is authorized under the FOIP Act.

In the social media realm, personal information includes an individual's name, email address or username if it includes the individual's name, a portion of their name, or otherwise identifies them.

The collection of identifiable personal information from a social media site and the subsequent use, disclosure and management of that information by GoA employees is subject to the privacy protection provisions of Part 2 of the *Freedom of Information and Protection of Privacy Act* (the FOIP Act).

- Personal information provided or posted directly by individuals to an official GoA social media page/channel/site, or that is posted to another site, must only be collected for reference or subsequent use if that information is necessary for an operating program, or the collection is otherwise authorized or required by law.
  - Personal information that is posted or shared on social media sites must only be collected by GoA in accordance with the indirect collection rules of section 34 of the FOIP Act. However, an author's views and other personal information published in a social media context (e.g. a popular or widely read blogger's posting) may be collected and used in a manner consistent with a journalist or reporter's information published in traditional media outlets.
  - All GoA social media channels that are intended to collect personal information about visitors or contributors for program purposes must display a Notice of Collection, in accordance with section 34 of the FOIP Act. The notice must inform an individual of the purpose and legal authority for the collection and the contact information of an employee who can answer questions about the collection.
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- Personal information collected from a social media site must be managed and protected in accordance with the provisions of sections 35 to 40 of the FOIP Act.

All records concerning GoA content posted to, or obtained from, any social media page/site are subject to the access to information provisions of the FOIP Act. Third party sites hosting GoA content and comments, however, are not subject to the FOIP Act in any way.

## **References**

- *Information Security Classification guidelines (IMAC)*
- *Government of Alberta Communications Policy*
- *GoA Internet and Email Use Policy*
- *Official Oath of Confidentiality*
- *Code of Conduct and Ethics, and any supplementary codes*
- *Your guide to Information Security* (published by Service Alberta)
- *Freedom of Information and Protection of Privacy Act*
- *Protecting People's Personal Information Directive (PPPI)*
- *Policy for Protection of Personal Information in Information Technology Outsource Contracts*