



division of
**Archives and
Records Service**

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Social Media Use Guideline for Government Agencies

Created by the Records and Information Management (RIM) Section

[Division of Archives and Records Service](#)

Purpose: This guideline is intended to help governmental entities make strategic, informed decisions regarding social media policy and management, thereby mitigating risks associated with the use of social media.

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Social Media Best Practices and Strategy

Social media can help your agency connect with the community in an easy, accessible, and cost-effective way. Along with the benefits, using social media has associated challenges of security, privacy, and records management which can best be addressed through proactive strategies. Implementing simple and clear social media policies, processes, and assignments can help optimize the benefits and reduce the risks. One example of employing strategy effectively is restricting the use of personal accounts for government business.

Any social media accounts used for government business are subject to Utah's public records laws: the Government Records Access and Management Act (GRAMA, Utah Code 63G-2) and Utah Code 63A-12. If personal accounts are used for government business, then the content created is a public record, and the personal accounts must be managed and archived according to these public records laws. For this reason, it is best practice to not use personal accounts for government business.

Ideally, this would mean that:

- Public officials and all staff use official media accounts for all government business.
- Government communications do not originate from personal accounts.
- Personal accounts are used for personal communications.

- Official government pages are not used to post content reflecting the interests of political campaigns or parties.

What can a records officer do to ensure an elected official is using appropriate social media accounts for official vs personal business purposes?

Alone, a records officer has little means to enforce best practices, but by working with their organization to create a social media use policy that entity leadership officially adopts, levels of awareness and compliance should increase.

Develop a Social Media Policy

Social media policies can address whose accounts are sanctioned for social media use, as well as which records you want your agency to create on social media, how you want staff and representatives to interact with the public, and how social media records should be managed.

Elements of a Social Media Policy

- **Internal appropriate use standard**
 - Establish expectations for how employees should talk about your organization, administration, and initiatives on social media.
 - Guide staff on how to respond to, follow, and engage with social media when others mention your organization.
 - Clarify what information should and should not be shared on social media.
 - Specify which social media platforms and accounts your organization has elected to use and if there are any that are prohibited.
 - Specify who will have administrative access to your social media accounts and who will not.
 - Credit original sources when using open source materials. Get permission to use any copyrighted material.
 - Ensure employee accountability for what they post, especially if you allow a lot of people to have access to your social media accounts.
- **External appropriate use policy**
 - Establish the parameters of your social media site and expectations for how the public should engage with it.

- Consult with your agency's legal counsel about policies for moderating content consistent with First Amendment obligations and Federal laws.
- Publish an outward-facing policy for public commenters and agency moderators to follow, and post it where users will be most likely to find it. The policy needs to:
 - List categories of prohibited speech and behavior that are subject to deletion or banning.
 - Please note that viewpoint discrimination is not allowed. You cannot remove somebody's opinion because it is critical of you or your agency, or because it is contrary to the position of the agency, even if the opinion is stated rudely.
 - Be posted publicly
 - Be applied consistently
- A sample policy is included at the end of this guideline (see Appendix A).

➤ Guideline for moderating public content judiciously

- Social media may include public comments or postings which are inconsistent with an administration's policies and may require removal from the site.
- Create clear guidelines for moderating content which aligns with your agency's strategy while also complying with the First Amendment's protection of free speech. These guidelines could be the same as, or in addition to, the outward-facing policy for public commenters mentioned above.
- Train platform moderators to distinguish between a prohibited category of speech and a protected viewpoint.
- Develop a "tiered" moderation policy wherein commenters who repeatedly violate the comment and posting policy receive a set number of warnings before being prohibited from posting.
- Preserve both deleted comments and their context in order to defend challenges to a deletion or prohibition/banning.

➤ Recordkeeping practices and requirements

- Familiarize yourself with the recordkeeping capabilities of the platforms that you use, and of the provider's practices regarding your records.
 - Does the social media provider delete records; if so, when?
 - Can you export your own records; if so, when and how?

- What are the options for capturing records for preservation? Social media platforms are unique, and the content generated in each platform must be evaluated and captured in ways best suited to the particular platform.
 - What happens to your account and records if the provider goes out of business or is purchased by another company?
 - Develop policies and procedures specifying when you will identify and capture historical public records on social media, and whether you will transfer them to the Division of Archives and Records Service or preserve them in-agency (e.g., annually, or at the end of an elected official's term, or when changing social media platforms, etc.).
 - Plan what to do when an employee or official who uses one of your agency's social media accounts leaves or is terminated. Determine whether you want the account to be closed or to remain open, and how your agency will retain access to it.
 - Contact the Division of Archives and Records Service records and information management (RIM) specialists if you have questions.
- **Roles, responsibilities, and training**
- Clearly define for each platform who will create content, monitor quality and appropriateness of content, schedule postings, moderate public comments, own content, manage the accounts, and capture content.
 - Educate staff regarding social media policies and train them to fulfill their roles correctly.

Managing Social Media as a Public Record

Significant governance happens via social media; social media communications have been used to inform the public in times of uncertainty, to unveil public policy, and as evidence in court cases. Posts may offer insights into government decisions and practices. Social media content that relates to transactions of government business, and accounts created by government, are government records, and their management and care are governed by the same laws that apply to government records in any other format or storage medium.

Apply Retention Schedules to Social Media

Records published on social media platforms and websites do not all have the same value. The content of a post and its value will make a difference in determining retention and disposition. However, it may not be a good idea (or even possible) to delete content from a social media platform; the best strategy may be to focus on identifying content that has historical value, and establishing a retention schedule for it.

Several existing retention schedules apply to records on social media. A summary of an agency's accomplishments for the year could be the equivalent of an annual report and would follow the general retention schedule [GRS-3, Annual or Official Reports](#). Content in a post could be equivalent to a government publication, which would follow [GRS-1678, Publications](#), or to a press release, which would follow [GRS-1716, Public Relations Records](#). Or content could be only temporarily valuable, such as an X post announcing that the office will be closed due to construction, which would follow [GRS-1759, Transitory Correspondence](#).

One important thing to remember when managing social media records is that only the record copy needs to follow the retention schedule; if you publish content on social media and have another copy elsewhere, you may choose which copy is the record copy. However, keep in mind that:

- If the record copy is destroyed, but another copy still exists, it now becomes the record copy (by default);
- If there is public comment on a social media post, the post and comment are now a unique record, with no identical copy elsewhere.

The most practical approach may be to identify records with long-term or historical value and focus records management efforts on preserving them effectively.

Capture and Preserve Historical Content

What to Capture and Preserve

Public records in social media that should be captured and preserved may include:

- Evidence of an administration's policies, business, or mission
- Information only available on the social media site

- Official agency-issued information
- Direct communication with the public using social media

How to Capture

There are several different methods that can be used to capture social media records, including:

- RSS Feeds, aggregators, or manual methods to capture content;
- Tools built into some social media platforms to export content;
- Platform-specific application programming interfaces (APIs) to pull content;
- Web crawling or other software to create local versions of sites; and
- Web capture tools used to capture social media.

Not all social media platforms support all of these options, it will depend on the technical configuration of the social media platform. Agencies may need to work with third-party providers to implement social media capture, (U.S. National Archives and Records Administration, Bulletin 2014-2, 2013).

Other factors that should impact an agency's decisions about social media capture methods will be unique to the agency, such as their function, support structure, budget, staff capabilities, risk tolerance level, relationship with the public, and the ways they have utilized social media.

How to Preserve

Preserved social media records should include content, context, and structure, along with the associated metadata (e.g., author, date of creation). There are social media preservation tools on the market that can facilitate the preservation of, and access to, social media content. Forrester Research, Inc. has published a market review of social media archiving tools, and asserts that "Social archiving vendors help meet...emerging challenges with tools that directly capture social posts, fully recreate metadata, and enable quick, intuitive searches to handle review and supervision tasks," (Hayes, Nick & Cheryl McKinnon, 2015, p. 1).

Features to look for in a social media archiving tool include:

- Has archive options for all of your social media platforms (Facebook, Instagram, Google+, LinkedIn, Pinterest, Twitter & YouTube, blogs, Flickr, etc.)

- Archives social media records in their native format, preserving all metadata and context.
- Live captures and archives data, automatically 24/7
- Archives ALL social media account information (the past, present, and future)
- Creates custom retention rules per account
- Searches and filters internal and external (public) social media archive while maintaining context and metadata
- Searches across all social media archive accounts agency-wide
- Exports data in its original format and context--whether performing an export based on a specific topic or exporting the entire archive directory and its contents
- Creating agency maintains ownership rights to ALL social media data archived by a third party archiving solution
- Comprehensive reporting
- Connects to your own local backup (your servers) as well as having cloud-based backups (their servers)
- Creates and exports an audit/maintenance log
- Imports data from other archiving systems
- Encrypts data with 256-bit encryption, and is SSAE16/SOC2 Audit Certified
- Runs a checksum as part of each backup procedure

Contact the Division of Archives and Records Service (RIM) specialists if you have questions about capturing and preserving your social media accounts, posts, and comments for archiving, or to discuss a plan for transferring social media records to the State Archives.

Resources for Further Study

Government

National Archives and Records Administration (NARA)

- "Guidance on managing social media records," [Bulletin 2014-02](#), 2013
- [Social Media Policies and Public Comment Policies](#), 2021

Utah Department of Technology Services

- [State of Utah Social Media Guidelines](#), 2016

Utah Division of Archives and Records Service

- [Records and Information Management Specialists](#)

Professional Organizations

Council of State Archivists and National Governors Association

- [Social Media and Public Records: Developing a Social Media Use Policy](#), 2018; guideline for government agencies.

Vendors or Corporations

ArchiveSocial, powered by CivicPlus

- [Government Social Media Policy Template](#), 2023
- [2022 State of Social Media in the Public Sector](#)

Forrester Research

- [Market Overview: Social Media Archiving](#), 2023; requires purchase

SMARSH

- [The Public Sector Guide to Social Media Strategy and Policy 2019 Edition](#)

YouTube

- [Community Guidelines](#), 2024; example of a public use policy.

Works Cited

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<https://www.archives.gov/social-media/policies/blogs-comment-policy.html>.

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<https://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html>.

Appendix A: Sample Public Comment and Posting Policy

We welcome your comments on our [*name of applicable social media platform*]. Here is some information you should know in advance:

- Our [*platform*] account is moderated and we will only allow comments from commenters over 13 years of age.
- We will remove comments that contain abusive, vulgar, offensive, threatening or harassing language, personal attacks of any kind, or offensive terms that target specific individuals or groups.
- We will remove comments that contain personal information (whether your own or someone else's), including home address, home or cell phone number, or personal e-mail address. Any information that would be considered private, protected, or controlled per GRAMA will likewise be removed.
- Gratuitous links to sites are viewed as spam and may result in the comment being removed.
- We will remove comments that are clearly off-topic, that promote services or products, or that promote or oppose any political party, person campaigning for elected office, or any ballot proposition.
- Reporters should send questions through [*your preferred method*] and refrain from submitting questions here as comments.
- We do not discriminate against any views, but reserve the right to not post or to remove comments that do not adhere to the above standards.
- Commenters who repeatedly violate this policy may be prohibited from posting.
- Communications made through our [*platform's*] messaging system will in no way constitute a legal or official notice or comment to [*your agency*] or any official or employee of [*your agency*] for any purpose.
- It is presumed that by posting a comment you are agreeing to have it released into the public domain, so do not submit anything you do not wish to broadcast to the general public.
- Your comments are welcome at any time. We will review and post comments as quickly as we are able.

Attribution

Portions of this sample policy have been adapted from the U.S. National Archives and Records Administration's "[Blog Comment and Posting Policy](#)."

Appendix B: Social Media Use Checklist

Using Social Media in Government

- ❑ Create a social media policy
 - ❑ Establish and disseminate an internal appropriate use standard
 - ❑ Make a plan for managing social media records
 - ❑ Designate roles (by platform) and provide applicable training
- ❑ Publicly post an external appropriate use policy (i.e., Public Comment and Posting Policy)
 - ❑ Provide a guideline and training for staff who will be enforcing the policy
 - ❑ Retain public comments that you remove, along with their context
- ❑ Train staff to use only official accounts for official information
- ❑ Identify retention schedules that apply to your social media records
- ❑ Capture and preserve historical social media records; consider transferring them to Utah's Division of Archives and Records Service (aka State Archives)