

Public Record Office Victoria
Standards and Policy

Recordkeeping Policy



Social Media

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Acronyms

The following acronyms are used throughout this document.

GDA	General Disposal Authority
NAP	Normal Administrative Practice
PROV	Public Record Office Victoria
PROS	Public Record Office Standard
RDA	Retention and Disposal Authority
VERS	Victorian Electronic Records Strategy

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Disclaimer

General

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Records Management Standards Application

The Recordkeeping Standards apply to all records in all formats, media or systems (including business systems). This Policy relates to recordkeeping and social media usage by government agencies. Agencies are advised to conduct an independent assessment to determine what other records management requirements apply.

Use of Terminology

The terms 'record,' 'information' and 'data' are used throughout this document. These terms should all be defined as meaning 'public record.'

Table of Contents

1. Executive Summary: Records & Social Media Use	4
2. Introduction	5
2.1. Purpose.....	5
2.2. Scope.....	5
2.3. Background.....	5
2.4. Related Documents	6
3. Policy Directives	6
3.1. Social Media and Public Records	6
3.2. Complete and Accurate Records of Social Media Use	6
3.3. Privacy	7
3.4. Disposal and Social Media.....	7

1. Executive Summary: Records & Social Media Use

Victorian government agency use of various social media applications is seen as an efficient and effective way to engage and interact with the general public. Social media can be used to create “real time” information, contribution and user generated discussion on all facets of government. Social media can be used by Government to facilitate public participation in processes that may otherwise prove difficult.

Victorian government agencies are required by the *Public Records Act 1973* to keep full and accurate records when conducting business, including business conducted through and on social media. For government to be held accountable, open to scrutiny and to ensure transparency, social media records (like any other business records) must be captured, managed, and retained as evidence.

Agencies that use social media should:

- Inform staff of their recordkeeping responsibilities in regard to work-related social media usage
- Provide training and information to support a standard method for capturing the social media record and associated metadata
- Safely retain social media records in a readable format for the minimum period of time required by the relevant PROV disposal authority
- Adhere to the Privacy Victoria Information Privacy Principles when capturing and storing social media records.

Requirements for record creation, control, storage and disposal contained in the Public Record Office Victoria (PROV) Standards are not media-specific and apply equally to social media records. The resulting records should be captured in a timely manner, as it may not be guaranteed that they will remain available online. Records should also preserve the context in which the social media was used. Agencies have a responsibility to ensure full and accurate records of their actions using social media are made and kept.



Justine Heazlewood
Director and Keeper of Public Records

2. Introduction

2.1. Purpose

The purpose of this document is to provide principles for making decisions and implementing actions about social media and recordkeeping across the Victorian government.

2.2. Scope

This policy is to be adopted by Victorian government agencies to support best practice recordkeeping of social media records that are created by a public officer in the course of their duties.

This policy supports the *Guidance for use of social media in the Victorian public sector* issued by the State Services Authority, in particular:

- Staff must maintain accurate and reliable records of their official use of social media as required by relevant legislation, policies and procedures.

2.3. Background

Social media is increasingly used for conducting business by the Victorian government. Confusion over whether social media use is or should be captured and managed as public records has resulted in the need for this PROV policy.

The *Public Records Act 1973* defines a public record as “any record made or received by a public officer in the course of [their] duties.”¹ This definition includes all messages sent, and responses received, by public officers when carrying out their duties, regardless of the:

- Medium used to send or receive the social media record
- Account name used to send or receive the message
- Role or seniority of the public officer sending or receiving the message.

The Victorian government describes social media as “*the term used for internet based tools for sharing and discussing information among people. It refers to user-generated information, opinion and other content shared and discussed over open digital networks*”.²

Social media may include (although is not limited to):

- Social networking sites (e.g. Facebook, LinkedIn, Myspace)
- Video and photo sharing websites (e.g. Flickr, Youtube)
- Blogs, including corporate blogs, personal blogs and Micro-blogging (e.g. Twitter)
- Forums, discussion boards and groups (e.g. Google groups, Whirlpool)
- Wikis (e.g. Wikipedia)
- Video on demand (VOD) and podcasting
- Instant messaging.

¹ *Public Records Act 1973* (Vic) s2

² State Services Authority 2010, *Guidance for use of social media in the Victorian Public Sector*

<http://www.eqov.vic.gov.au/victorian-government-resources/website-practice-victoria/web-2-0-victoria/guidance-for-use-of-social-media-in-the-victorian-public-sector.html> accessed July 2012

2.4. Related Documents

- [PROS 11/07 Capture Standard](#)
- Social Media Fact Sheet [forthcoming]

3. Policy Directives

3.1. Social Media and Public Records

Social media records made or received by public officers in the course of their duties are public records. They therefore need to be appropriately managed by the agency in accordance with [PROV's Standards](#) and Specifications.

The level of resources and effort required to capture and manage social media records will depend on a risk assessment of the use of the social media.

Agency specific policies regarding social media should inform members of staff and contractors of their obligation to keep records of their work-related social media usage.

Agencies should align policies regarding social media and records management to ensure that posts are managed in accordance with the agency's records management program.

When informing public officers and contractors of their recordkeeping responsibilities, agencies should include social media records. This includes ensuring that the social media accounts and platforms to be used when conducting agency business are known.

3.2. Complete and Accurate Records of Social Media Use

Social media posts created or received by a public officer(s) should be captured as close to the point of creation as possible or as soon as practical afterwards.

Where possible agencies should clearly define the capacity in which employees and contractors may authorise or publish social media messages on behalf of the agency.

Records management training should include social media use. At a minimum, training on social media and recordkeeping should be provided to the responsible members of staff and contractors that use social media in the course of their duties.

A record derived from social media should contain:

- The content (the information that is sent or received) including representation of the format (text, visual, sound or video)
- The context in which the record is used, the business purpose of the social media record and its relationship to the business of the agency (purpose of the record)
- The structure of the social media post
- Where possible, the original content, otherwise a text log of entries
- The metadata associated with the record.

Captured metadata should reflect an agency's metadata scheme and must include the following contextual metadata:

- The date and time the message was sent or received by the public officer or agency representative
- For messages sent by the agency, the name of the public officer that sent the message, who authorised the social media message (if relevant), and to whom it was sent (at a minimum a group address is sufficient)
- For messages received by the agency, the public officer and account name that received the message, the person to whom it was sent, and the name used by the person who posted the message (for privacy reasons, no attempt should normally be made to determine the actual identity of the sender)
- The purpose of the message (the relationship between the message and other records; why the message was sent or received; what it was in response to)
- The name of the social media application that the message was created on.

The question of what content and context should be captured for social media records to be full and accurate is a risk management decision. The agency must determine if the social media post, is in itself an accurate record, or if the agency post along with other users' interactions form the most accurate record.

3.3. Privacy

Agencies should adhere to Privacy Victoria's Information Privacy Principles when capturing and storing social media records. Privacy Victoria has developed an information sheet to support Victorian government agencies' understanding of their obligations when using social media for business purposes.³ Agencies should consult separately with Privacy Victoria regarding the privacy implication(s) of social media.

3.4. Disposal and Social Media

Records of social media use must not be destroyed or removed from the custody of the Victorian Government, or otherwise disposed of, without the authorisation of the Keeper of Public Records.

Records of social media must be sentenced and disposed of in accordance with the relevant disposal authority, regardless of the format of the record.⁴ This includes the disposal of records under Normal Administrative Practice (NAP) as authorised by [PROS 10/13 Disposal Standard](#).

All Victorian public agencies are subject to the [PROS 07/01 General Disposal Authority \(GDA\) for Records of Common Administrative Functions](#). Agency or function specific Retention and Disposal Authorities (RDAs) may also apply.

Agencies are required to retain social media records in a readable format for the minimum period of time specified by relevant RDAs if the records are kept in digital form.

END OF DOCUMENT

³ Information Privacy Victoria 2011, *Social Networking* [http://www.privacy.vic.gov.au/privacy/web2.nsf/files/social-networking/\\$file/info_sheet_04_11.pdf](http://www.privacy.vic.gov.au/privacy/web2.nsf/files/social-networking/$file/info_sheet_04_11.pdf), accessed July 2012

⁴ *Public Records Act 1973 (Vic) s12, 13 and 19.*