Guidelines for Government Use of Social Media by B.C. Public Servants

Purpose

For many of us, social media is a part of our daily lives and helps us communicate professionally and personally with those who care about what we do. In 2010, the BC Public Service was the first public service in Canada to provide guidelines to employees for both personal and professional use. This document updates those guidelines to reflect current practices, processes and tools in a rapidly changing social media environment.

Teams within Government Communications and Public Engagement (GCPE) lead and support social media use and citizen engagement activities. The purpose of this document is to inform BC Public Service employees about the processes and best practices for setting up and managing social media channels and citizen engagement processes through GCPE to support the work of government. The BC Public Service Agency has produced a separate set of guidelines for the personal use of social media as a BC Public Service employee.

Who provided input on these guidelines?

An important aspect in writing these guidelines was ensuring that input was received from relevant agencies, experts and practitioners. These guidelines were updated by GCPE with input from the BC Public Service Agency (PSA), the Corporate Information and Records Management Office, the Office of the Chief Information Officer (OCIO), the Executive Director of Digital Communications at GCPE, the Director of Marketing and Advertising at GCPE, the Director of Graphic Design Services at GCPE, the Intellectual Property Program (IPP) at the Ministry of Citizens' Services, as well as staff with information technology, information security, copyright, legal and communications expertise, and public servants who are part of a social media community of practice.

What is the role of GCPE when it comes to government social media and blogs?

GCPE has an integral role in setting standards for the use of social media. There are three teams within GCPE that you will get to know if you are looking to establish social media and blogging tools. They are:

> Digital Communications – This team manages and promotes the provincial government's social media channels, helps maintain the BC Gov News site and focuses on digital strategy to support the communications priorities of government. The contact is: GCPENEWSRM@Victoria1.gov.bc.ca

> Citizen Engagement – This team leads ministries in designing and implementing engagement opportunities to collect input from citizens about policies and services that impact them. The Citizen Engagement team manages and maintains government's blog platform and has an approval role in ministry blogging activity. The contact is: CitizenEngagement@gov.bc.ca

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Ministry communications shops – Each ministry is assigned a communications office by GCPE that provides support and services such as strategic communications advice and planning, media relations, issues management, event planning, news release, speech writing, social media and digital strategy.

These teams work together to ensure that citizens have a consistent user experience, content is presented with a common look and feel, and that guidelines and best practices are being followed for all citizen-government interactions.

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A. Which social media tools is government currently using?

As per Chapter 22 of Core Policy, ministries must obtain GCPE approval for the development and redesign of websites, web applications and apps, as well as the building or launching of new citizen engagement opportunities and social media accounts. Ministries are also required to adopt corporate technologies and follow corporate standards for websites and blogs.

The planning process prior to establishing a new social media tool includes considerations for managing intellectual property, records management, information security and maintaining privacy, including a Privacy Impact Assessment (PIA). A PIA must still be completed even if you determine that there is no personal information being collected, used or disclosed. GCPE leads the process for managing these considerations along with the Ministry Privacy Officer and/or Ministry Security Officer and others as needed.

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Below is a list of social media tools currently in use by the Government of B.C. The Connect page on BC Gov News has a complete list of active government social media accounts, blogs and engagement sites.

Twitter is an online news and social networking platform that allows users to post and interact with short messages that may include links, images, videos or hashtags. Users can interact with content by liking, retweeting or commenting on posts. Twitter is an effective tool when immediacy is important.

Facebook is a social media and social networking platform that allows users to post messages that may include links, images, video or other visual/audio content. Users can interact with content by commenting on posts, assigning an emoji and sharing posts with their own contacts. Facebook is a useful tool for highly-visual content, or when you hope to start a conversation with citizens.

Instagram is an online photo-based social networking platform best suited for sharing photos and short videos. Users can interact with content by liking it, leaving a comment or sharing it with others. Instagram is a useful tool for highly-visual, lifestyle-focused content.

Flickr is an online photo storage and gallery platform available with social networking, chat, groups and photo ratings. Government of B.C. corporate images are stored and organized on the Province of British Columbia Flickr Photostream, which is also used to share images internally and with outside stakeholders.

YouTube is an online video-sharing platform that allows users to comment, share and rate content. GCPE manages two YouTube accounts, the government's official channel that hosts paid media spots, event videos and other informational videos, and one which is meant for internal viewing which includes webinars and training videos.

Hootsuite – Hootsuite is a social media management platform founded in B.C. The system's user dashboard supports integrations for Twitter, Facebook, Instagram, YouTube and more. Corporately, Hootsuite is the preferred social media management tool for monitoring various social channels, comment tracking, responding to questions and scheduling posts. Each ministry GCPE communications shop has access to Hootsuite through a corporate account.

WordPress – GCPE manages a corporate blogging platform with online discussion capability for engaging citizens in both ongoing discussions and time-limited feedback opportunities. The corporate blog template provides guidance on look and feel standards, consistent user experience, corporate information security and privacy, legal terms of use and moderation policy. See the Citizen Engagement Handbook for assistance with planning and blogging advice.

B. How do I set up a new government social media account or engagement activity?

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It is important to note that GCPE takes a measured approach to creating new blog sites and social media accounts, so an early discussion with GCPE is essential to determine if your idea is likely to get approval. From time to time, based on proven need, new social media accounts and blogs will be considered. Please refer to the November 1, 2013 memo regarding the alignment of government's online presence regarding the alignment of government's online presence.

Any web content prepared for public consumption, regardless of the medium used, must be approved by GCPE, through the communications director assigned to your ministry.

Chapter 22 of Core Policy states that it is government's responsibility to ensure that government policies and programs are communicated to the public in a timely, relevant and accessible manner and that citizens can access the information and services they need from government in a way that is efficient and effective. GCPE can help you determine the tools and approvals required for creating new social media accounts. Beyond GCPE, approvals may include your supervisor, ministry executive, deputy minister or minister.

Final approval of all new corporate social media accounts rests with the GCPE Digital Communications team and the Executive Director, Digital Communications. Final approval of new blogs and other citizen engagement activities like apps that gather feedback or face-to-face open houses rests with the Executive Director of the GCPE Citizen Engagement team.

In many cases, rather than starting your own social media account, it may be better for you to work with GCPE to promote content about your program through existing Government of B.C. corporate accounts. This allows you to leverage the Government of B.C. brand, and an existing and well-established audience, rather than starting from scratch. Please connect with your ministry communications shop if you have content that you would like shared.

C. How do I moderate social media in my professional capacity?

B.C. public servants may in their professional capacity be involved in moderating, encouraging dialogue and responding to questions on social media and blogs. For this activity, employees are expected to follow the employee Standards of Conduct and the Corporate Moderation Policy.

All public servants must know there are categories of information that cannot be discussed with members of the public in any forum, either face-to-face or online. They include:

Matters before the courts;
Confidential policy advice, draft legislation etc.; and
Material about third parties (e.g. information about identifiable individuals) unless you have statutory authorization to do so.

Employees who are in doubt as to whether certain information is confidential must ask the appropriate authority, such as their Ministry Privacy Officer, before disclosing, releasing or transmitting it.

You must notify your communications shop if you receive a media request, including those from bloggers and other social media personalities who may be working on a story. Additional advice on moderation best practices can be found in Appendix A of this document.

D. What privacy concerns do I need to be aware of?

When a citizen leaves a comment or provides an opinion on a government social media channel or blog, they are providing personal information. There are legislated restrictions through the *Freedom of Information and Protection of Privacy Act* (FOIPPA) that set out what information government may collect, use and disclose. The definition of personal information has a broad scope and includes, among other things, an individual's home address or email, appearance and image, educational and employment history and personal opinions.

Part of the planning for citizen engagement and social media will include a discussion with GCPE and possibly your Ministry Privacy Officer on the privacy implications of the approach and tools being considered. Some of the questions that may be asked as part of planning include:

- Will anyone be sharing photos or videos containing identifiable individuals?
- Will participants be sharing personal information about others, perhaps people they are caregivers of, their neighbours or friends?
- Will anyone be able to identify the third parties based on the comments?
- What is the data flow of personal information and opinions once it is received?
- What happens to the personal information once the project is complete?
- How will GCPE and the ministry ensure that personal information and opinions are not improperly disclosed through systems or processes?

If you are approved to establish a government social media tool, GCPE will work with you to complete a Privacy Impact Assessment (PIA), which will help make sure your social media use is in compliance with FOIPPA.

E. How do I limit the collection of personal information?

Through the planning process with GCPE, government must be able to demonstrate that it intends to collect only the information it needs for the purpose of the planned program or activity, and that the information relates directly to and is necessary for the program or activity. Necessity of information is a

strict test – it is not acceptable to collect personal information for convenience or because it would be nice to have.

When using a government blog or social media to engage the public, you should carefully consider how you pose questions, so you do not elicit more information than is necessary. Unless you are going to use the information, do not collect it.

FOIPPA requires ministries to inform citizens about any intended collection of personal information. As part of the planning process, GCPE will work with you to properly provide notice to citizens, including the legal authority, the purpose for their collection and the contact information of an employee who can answer questions about the collection.

F.   What about collection of third-party personal information?

Another important consideration is that government may not collect personal information about a third party. For example, John Hume posts on a government blog, '*Here in Atlin, my wife, Jane Hume, needs to take daily doses of Medication A.*' This is Jane's personal information and should not be collected. This type of comment should be avoided through explicit terms of use, careful consideration of how questions to the public are phrased and site moderation. The blog moderator in this scenario should remove the comment and send John a message explaining that disclosure of names goes against policy.

However, if John posts, '*A person close to me needs to take daily doses of a medication, which is quite expensive, and I would like to see lower costs of medications*,' that would be acceptable because government is not collecting, and John is not disclosing, specific personal information.

While there are some notable exceptions in *FOIPPA*, the Act primarily requires the collection of personal information be directly from the person it is about. However, it is recognized that many citizens tell stories about their children, friends, neighbours and colleagues when telling stories about the impact of government policy, and that if they are not disclosing, and government is not collecting – even by inference – specific personal information that could identify a third party, this is an acceptable approach for citizen engagement purposes. Be aware of information that, while it does not directly identify someone, could identify them when combined with other known information.

As part of the planning process, ministries will be encouraged to provide other avenues for interaction, such as a government email address, for users who do not wish to share information with government on social media and engagement sites.

G.   If a citizen has shared a comment or other content, can I reuse it?

From time to time, government may wish to reuse personal information, such as opinions that were originally provided for the purposes of public discussion and promotion of proposed or existing

initiatives, policies, proposals, programs and legislation. For example, if Jane Smith posts on a government channel her opinion about a policy, government may choose to include this comment in a social media post, graphic or in the final engagement report. This is acceptable under *FOIPPA*. However, identifiable elements should be removed if they are not required to communicate the message or further engage with the community.

However, government may not freely re-post personal information from other information sources, such as another website, photos, a newspaper article, government press release or ministry file. To do so, ministries must either have written consent from the individual whose information is being disclosed or there must be legislation directing that the disclosure may take place. For online consent options, you should work with your GCPE contact and Ministry Privacy Officer to ensure your initiative is in compliance with *FOIPPA*.

H. What do I need to be aware of regarding intellectual property and copyright?

Intellectual property is the set of rights arising from the creation and development of music, videos, computer software, publications, training manuals, reports, maps, etc. Intellectual property rights include, but are not limited to, copyright, trademarks, official marks, domain names, patents and industrial design.

The Government of B.C. claims copyright on any materials it posts or publishes, so it is essential that ministries confirm the materials posted online are owned by the Government of B.C. and are not protected by someone else's copyright, existing restrictive licensing agreements or other terms of use that would prohibit government from posting the materials. Materials automatically become the property and copyright of government if created by an employee while at work.

Copyright encompasses a wide range of assets including written materials, such as books, manuals, reports and computer software; visual materials such as videos, photographs, pictures, posters and maps; and audio materials such as music and voice recordings. Also, commonly used within government are registered trademarks and official marks, which are usually logos, word marks, or other branding associated with government.

All materials found online are property of their authors which may only be used if accompanied by a license or if prior permission is obtained from the author. Ministries must not use the trademarks or logos of another entity unless there is a legal partnership agreement. Government cannot be perceived as endorsing a third-party or its programs or products. Stock photos may be used providing they have been purchased as royalty-free with unlimited rights usage.

Under provincial policy, ministries must not permit any third-party to use Government of B.C. logos, marks or other copyright materials without approval of GCPE and, if permission requires a license, approval by the Intellectual Property Program, Treasury Board or authorized ministry legislative authority is required.

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Any questions about the use of intellectual property or copyright on social media and citizen engagement sites should be directed to the GCPE contact you are working with, who may follow up with the Intellectual Property Program.

I. How do I keep social media and citizen engagement records?

Ministries must consider how best to document the projects and activities for which they use social media tools and citizen engagement processes. Key records need to be classified and filed in the office recordkeeping system, and this may involve copying or transcribing information originally presented on social media. Other documentation may be identified as transitory records and destroyed.

GCPE can assist with determining an approach for documenting records. Records management policies and guidelines, information schedules and other resources are available on the Records Management website.

J. How do I prevent information security incidents?

Prior to launching a social media tool or citizen engagement process, you must work with your GCPE team and Ministry Information Security Officer (MISO) to assess the information security risks of a particular tool, determine the appropriate security settings and ensure that you understand the terms and conditions for the site. GCPE and your MISO will determine whether a Security Threat and Risk Assessment is required for your initiative.

Any suspected or actual information incidents must be reported to your supervisor or manager, the GCPE team you are working with, and the 24/7 Breach Reporting Line by calling the Shared Services BC Service Desk at 250 387-7000 or toll-free at 1 866-660-0811 and selecting Option 3. You will be contacted shortly by an investigator for further details. This procedure is outlined in the Information Incidents management process.

In the case of suspected spam comments on an engagement blog, the Citizen Engagement team may be able to resolve the issue. When in doubt, follow the reporting procedures in the paragraph above.

Advice on security best practices can be found in Appendix A of this document.

K. Does being a public servant impact my personal use of social media?

All employees appointed under the *Public Service Act* are required to swear the Oath of Employment and comply with the Standards of Conduct as a condition of their employment. The Oath requires public service employees to conduct themselves in a manner that maintains and enhances the public's trust and confidence in the public service. The BC Public Service Agency communicates Standards of Conduct expectations through employee orientation, training and support, as well as through internal tools on the employee intranet *@Work*.

To comply with the Standards of Conduct, employees must conduct themselves in a way that separates their personal and professional use of social media and must avoid all real, potential and perceived conflicts of interest. Employees must maintain impartiality in the performance of their duties and avoid making public comments or entering into public debate regarding government policies. This commitment starts from the time an employee takes the Oath as a new public servant, and they must conduct themselves accordingly throughout their employment.

For more information on how this applies in social media, refer to the BC Public Service Agency's guidelines for personal use of social media by BC Public Service employees. Additional questions about how the Standards of Conduct relate to your job should be directed to your supervisor or AskMyHR.

L. What about social media and citizen engagement during an election period?

There are specific guidelines for employees during the election period, which includes the interregnum (beginning when the election is called and ending on election day) and transition (from election day until the new cabinet is sworn in). To ensure strict compliance with the *Election Act*, all Government of B.C. advertising, communications, internet/web updates, social media and citizen engagement activities are limited to public health and safety information, statutory advertising (statutory meaning advertising required by statute, regulation or policy) and responding to the public regarding services.

During this time, ministries are not allowed to publish content that may be perceived as promotional of government priorities, programs, services, policies, etc. This includes any citizen engagement activities that may be multi-year or ongoing. Public feedback can still be accepted, but no new promotion or engagement can occur. The only exception is for emergency or public health and safety purposes, which must be coordinated with the respective GCPE communications director and the GCPE Executive Director responsible for the communications department in question.

Program areas that frequently issue social media content necessary to public health and safety include DriveBC, TranBC, Emergency Info BC (including PreparedBC and emergency preparation accounts) and the BC Wildfire Service. During an election period, all content will be considered on a case-by-case basis by the ministry communications director.

Employees should also be particularly conscious of their personal use of social media during an election period. See the BC Public Service Agency's guidelines for personal use of social media by BC Public Service employees for more information.

M. Use of social media by government spokespeople

For all intents and purposes, social media accounts can and should be considered an extension of the identity of an individual. Like their owners, a social account can embody different identities: Cabinet Minister, MLA, parent, etc.

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Ministers can and should post to social media, including Facebook pages, in their capacity as a government spokesperson. And they can do so while also using the same account to connect with constituents in their capacity as an MLA, or parents and players as a coach, for example.

The role of GCPE communications staff in supporting ministers with social media outreach is similar to how GCPE staff produce speaking notes and video products for announcements and tour events. GCPE communications departments should produce suggested social media content for ministers and other spokespeople related to ministry events and announcements. Minister's offices can then choose to adapt and work with their minister to post the proposed digital content.

For example, GCPE communications staff should prepare suggested Facebook posts and tweets related to a major ministry announcement for their Minister. GCPE staff can and should also offer support to ministerial staff as it relates to digital communications best practices and posting the content.

GCPE communications staff should not, however, write suggested content unrelated to their minister's role as a spokesperson for their ministry, such as in their role as an MLA, as a member of a political party, their role as a coach of a sports team, or as a family member,

GCPE communications staff should also not be posting to social media channels on behalf of a minister. This is because, by having access to a minister's public social media account, they may inadvertently collect personally identifiable information of individuals who are interacting with the account. Collecting personally identifiable information from individuals without a collection notice is not permitted.

APPENDIX A – Social Media Best Practices

Security Best Practices

Creating structure around access, roles and logins can help protect government blogs and social media accounts from security incidents. GCPE can help public servants develop smart security patterns to safeguard account security.

Some security best practices include:

- Restrict access to pages and accounts to those who need it;
- Establish and follow rules around where personnel fit in the role hierarchy (e.g. only one or two admins on Facebook with others as editors or below)
- Use single logins when possible, or restrict login to government email addresses which can be controlled if compromised;
- Reduce the number of personal email accounts being used to login to Facebook, which can expose government accounts to security incidents if personal Facebook accounts are compromised; and
- Ensure any personal accounts adhere to password security best practices by choosing complex, unique passwords that are different for each account, changing passwords often (at least every 3 months), and setting up two-factor authentication for any account that has access to government assets.

Moderation Best Practices

Each social media tool will require its own moderation policy and terms of use. For example, the Corporate Moderation Policy must be used when setting up the government blog platform. These are legal documents that will notify citizens of government's intentions and help to ensure that nothing inappropriate is posted to a government blog or social media channel.

Some additional tips for moderating include:

- Only comment on topics that you have responsibility for and direct knowledge about. Refer out-of-scope questions to those with responsibility for those areas or to the relevant communications officer in the GCPE communications shop;
- Provide information in plain language and avoid personal bias;
- Check for spelling and grammatical errors;
- Be polite, communicate respectfully, and encourage positive, helpful exchanges of information;
- Do not provide links to, or information about, sites that contain unlawful, objectionable or inappropriate content; and
- Never include your personal phone number, e-mail address or other personal information.

Content Best Practices

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A [social media community of practice](#) was created as a place for practitioners to come together quarterly to discuss important issues about using social media in the government context. Below is some important advice from practitioners about moderating and developing content. The community of practice is a useful resource for content ideas and technical tips to develop engaging social media posts.

Be Personable

Success with social media requires a personable, conversational style in your online interactions. This approach will help you build productive relationships, manage your ministry's reputation and help you become a valued and proactive contributor to online conversations and communities. Draw on your experience to tell stories and anecdotes that illuminate your ideas and use an authentic voice to help people connect to the person behind the keyboard. In doing so, be mindful of the privacy guidelines and information collection and disclosure guidelines outlined in this document to avoid compromises of your own or others' privacy.

Be Relevant

Provide information that is timely and useful for your audience. Work thoughtfully to create conversations that are productive, and be responsive to questions and feedback that comes in. You should talk with your ministry's GCPE communication shop if you want advice about how to create relevant, engaging content for your audience.

Plan Ahead

Keep the conversation going by developing a content calendar to plan what you want to share and when. Regular timing of posts can be helpful for increasing a following and keeping them engaged and focus on quality content. Whatever schedule you decide on – twice a week, once a day, multiple times each day – an editorial calendar can help you strategize the content you want to create for each platform and when you want to share it.

Consider the timeliness of your content and ways you might tie-in to public events, seasons, occasions and topical themes. Just as important as knowing when to share content is knowing when it is not the right time. For example, during large breaking news events adjusting your content plans may avoid appearing insensitive or out of touch.

Prioritize Customer Service

A customer-centric approach includes responding to all public questions and comments promptly, creating content based on what the audience is looking for or needs further explanation on, and collaborating on content, all done with a focus on whether the public would find the content interesting.

With a clear priority around customer service, TranBC and DriveBC, for example, have a strong following as the Ministry of Transportation and Infrastructure's social media presence. Actively engaging through seven platforms, and guiding multiple Twitter profiles with regional focuses,

their mission is to build community and trust around safety, mobility and the economy by providing accessible, useful, informative and timely service. This allows TranBC and DriveBC to increase engagement and reach, build public trust, better support ministry announcements and ensure they're the go-to place for B.C. travel information.

Manage Issues Wisely

Social media is a helpful way for public servants to be made aware of emerging issues. Sometimes issues can be identified as they begin to unfold on government's social media profiles, and at other times issues may be directed specifically at them. It is important to work closely with your ministry communications director when this happens, so you can respond to issues appropriately.

Monitor Regularly

Citizens see social media as a way to directly access information and people quickly. Frequent content updates and prompt, helpful responses to inquiries can go a long way in building trust with followers. Be sure to check in with your social media profiles frequently to check on new activity, provide follow up to comments and identify emerging issues.