# Keys for Developing a Social Media Policy

**S**ocial media is reshaping the way organizations conduct business – from running sweepstakes to enacting sales transactions of products and services to managing various facets of customer relationships.

Getting ahead of this juggernaut of technological change is no small task. While using social media is rife with risks, a well-constructed and enforced social media policy can substantially mitigate or minimize those risks.

This excerpt from the ARMA International Technical Report *Using Social Media in Organizations* (ARMA TR 21-2012) provides valuable guidance for developing such a policy.

## Policy Development

Policy that addresses an organization's participation in social media should be approved and championed at a high level within the organization, be technologically neutral (not restricted to a particular software and/or hardware), and support the organization's goals, objectives, governance structure, and organizational culture.

Successful policy creation and/or modification result from a collaborative, team effort. If records and information management per-sonnel are developing the policy, they should elicit input into policy development from other stakeholder groups, including, but not limited to, Human Resources, Information Technology, Legal, and Marketing.

Initiate social media policy development by:

- Identifying the need for a policy to govern the organizational use of social media technologies
- Examining existing policies to identify which policies (if any) already cover records/information management and social media use
- Determining whether policies governing social media technologies should be embedded into existing policies or will need to stand alone, and, if embedded in existing policies, identifying the policies of which they will be a part

- Ensuring new social media policies align with existing policies
- Identifying key stakeholders responsible for new social media policy approval and implementation

See Figure 1 "Policy Development Workflow" on page 43.

## Information Gathering and Analysis

Pertinent information may be gathered through interviews with administrators, decision-makers, records managers, and employees who participate in and/or oversee the use of social media. Analysis of the organization's data map and literature (e.g., annual reports, work and strategic plans, legal documentation, and legislation) should also be undertaken. This analysis will help to understand the administrative structure in which the social media policy, processes, and procedures will function.

Identify the legal and regulatory obligations applicable to the organization's recordkeeping requirements. Identify the relevant points that are key to the use of social media and that will need to be accounted for in the policy. This identification process should include, but is not limited to:

- All applicable laws, regulations, and statutes relating to information governance, protection of privacy, and freedom of information
- Intellectual property, e.g., copyright, legislation, and requirements to ensure protection of organizational assets
- Regulatory and/or professional bodies' guidance on the use of social media

[Editor's note: Further information about laws and regulations is available in section 5 of *Using Social Media in Organizations*.].

A review of social media-related

activities within the organization will also provide an understanding of social media's potential impact on records and information management. Data can be gathered by interviewing social media users and inventorying and analyzing the social media technologies they use. Conducting such a usage review will aid in identifying and understanding:

- Organizational norms and standards for record creation within social media applications
- Personnel and technological concerns and/or constraints about the use of social media
- Business/organization cultural issues that impact the use of social media

Map the existing social media use within the organization to the identified best practices and statutory/regulatory obligations under which the organization operates. This will aid in the identification of gaps that will need to be addressed as well as whether more information gathering is required.

[Editor's note: Further information about risk management and behavioral norms is available in section 7 of *Using Social Media in Organizations*.].

## Identifying Required Policy Elements

Whether by inclusion in existing policies that address records and information management or through the creation of a new social media policy, required policy elements should be identified. Establish the elements needed to mitigate the risks associated with the use of social media technologies and enable the identification, creation, capture, transmission, and/or storage of records.

Suggested elements:

1. **Purpose/objectives statement** – Describes the purpose or set of objectives that align
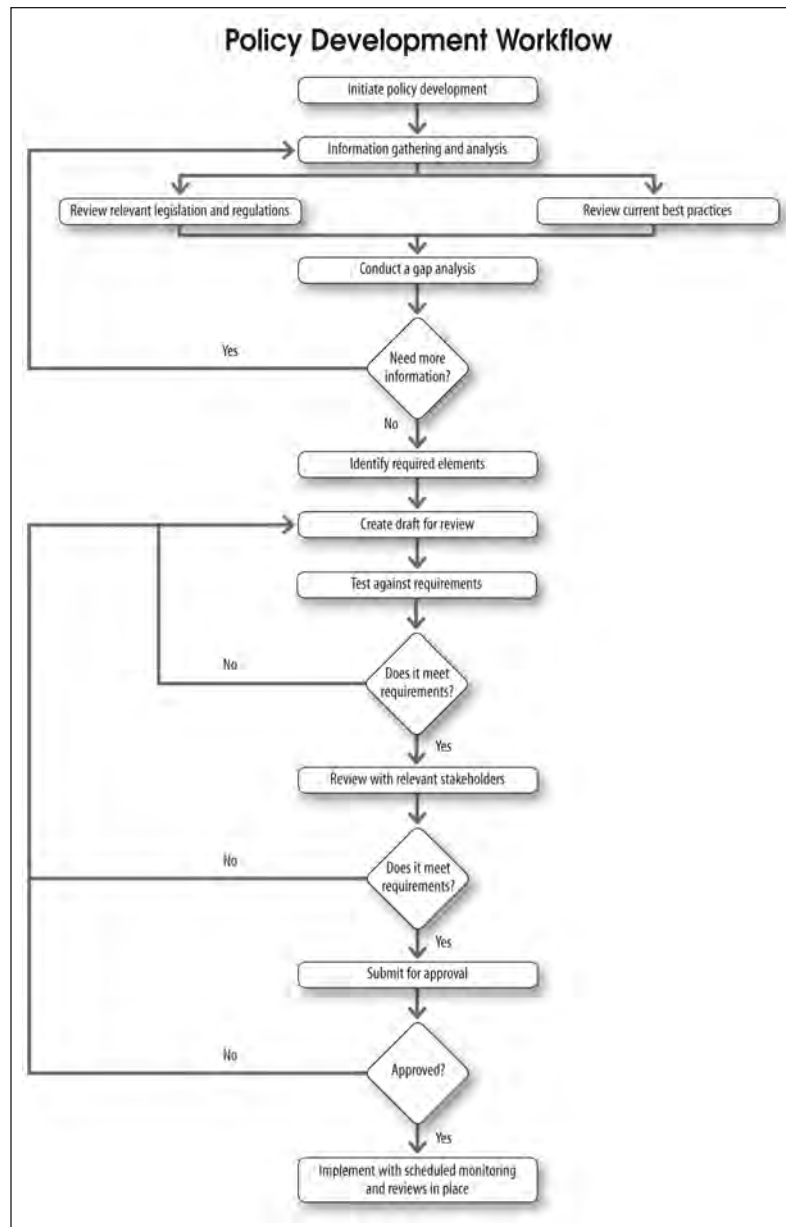


Figure 1: "Policy Development Workflow"

the goals of the social media policy with those of the organization.

2. **Scope statement** – Indicates the types of social media to be used, the purposes for the usage, the department personnel to whom the policy applies, and the types of records and information covered.

3. **Mandate statement** – Correlates to the mandate of the organization, agency, or department issuing the social

media policy.

4. **Definitions** – Contains a glossary of organizational and social media terms used in the policy (particularly if these terms differ from standard organizational use).

5. **Roles and responsibilities statement** – Identifies stakeholders and their responsibilities pertaining to the social media policy.

6. **References** – Provides a listing of national/regional leg-

islation and regulations to which the social media policy adheres, including relevant organizational policies.

7. **Version control** – Offers assurance that the most up-to-date social media policy is being followed; includes version number, date policy is effective, and, if superseded, the date superseded and title of the policy it supersedes.

8. **Review statement** – Indicates the individual and/or department responsible for reviewing the social media

should expect when using social media sites on behalf of the organization.

11. **Confidentiality guidance** – Instructs employees on the protection of confidential and personal information within the context of social media.

12. **Social media site guidance** – Lists the types of social media tools (e.g., potential sites) approved by the organization to communicate organizational information.

13. **Permissible information statement** – Identifies the

dia postings.

17. **Intellectual property statement** – Provides guidance on using and posting copyrighted works, trademarks, and protected materials on social media sites.

18. **Security statement** – Instructs employees on data security within the context of social media.

19. **Ownership statement** – Identifies organizational ownership of social media accounts, content, and participants (e.g., "followers").

20. **Enforcement statement** – Indicates how the policy will be enforced within the organization and the consequences for violating the policy.

21. **Signature** – Provides a line at the end of the policy document so each employee may sign and acknowledge that he/she has read, understood, and agreed to the terms of the policy.

## The initial draft policy should be reviewed by the key stakeholders and their feedback elicited.

policy (also the policy contact), the date the social media policy was reviewed, the date the social media policy was approved, the length of time between social media policy reviews, and the date of the next social media policy review.

9. **Behavioral expectations statement** – Describes how an employee is expected to communicate and conduct him/herself on behalf of the organization when using social media – including user authorizations, use and storage of passwords, permissions to post to social media accounts, use of anonymity, rights after termination, and authorization to change account names and settings. (Ensure that organizational social media policies are not in violation of employee rights under applicable labor legislation.)

10. **Expectation of privacy statement** – Delineates the level of privacy employees

categories of information considered permissible for creation, capture, transmission, and/or storage via social media.

14. **Records management guidance** – Provides directives regarding the management of records created with social media technologies including records creation, capture, transmission, storage, retention, and disposition, as well as appropriate records metadata application and preservation.

15. **Account maintenance guidance** – Gives instructions for establishing, maintaining, and closing social media accounts.

16. **Legal statement** – Provides legal disclaimers for inclusion in the organization's social me-

The initial draft policy should be reviewed by the key stakeholders and their feedback elicited. This will aid in identifying errors in the policy, addressing implementation issues, and ensuring the policy aligns with existing organizational policies and norms.

Following the policy's drafting and approval, the organization should communicate its content to all employees through education and training activities. Due to the ever-evolving nature of social media, the policy should be monitored and updated with concomitant re-education/re-training of employees, as needed. **END**