



## SOCIAL MEDIA POLICY

### EXECUTIVE AND INTERGOVERNMENTAL AFFAIRS

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#### POLICY STATEMENT

The purpose of this policy is to establish a common approach for managing Government of Nunavut (GN)'s official participation in social media to enhance opportunities for effective communications and service delivery for Nunavummiut.

#### PRINCIPLES

This policy supports *Inuuqatigiitsiarniq* (building relationships), *Tunnganarniq* (being open, welcoming and inclusive) and *Pijitsirniq* (serving the public) by ensuring that the GN:

- is accessible and accountable to the public it serves;
- delivers communications that reflect the diverse nature of the territory in a fair, respectful, representative and inclusive manner consistent with Inuit societal values;
- communicates clearly, openly, transparently, objectively and usefully;
- provides information to the public in a timely, accurate and consistent manner to ensure quality delivery of service;
- considers Nunavummiut's interests and concerns regarding the GN's delivery of programs and services;
- delivers prompt, courteous and responsive service that is respectful of individual rights;
- makes every reasonable effort to communicate in all official languages and abides by the *Nunavut Official Languages Act* and the *Inuit Language Protection Act* and related government policies with respect to communications materials and activities. In rare instances where timely, urgent/ emergency communications are necessary, translations will be provided as soon as they are available; and
- uses consistent corporate identity to ensure clear identification and access to government programs and services.

#### APPLICATION

This policy applies to all GN departments. It does not apply to territorial corporations or public agencies.

## DEFINITIONS

Official presence: A dedicated internet page or channel on a social media website that is identified by the official GN logo and that is used for the purpose of informing or communicating with Nunavummiut or visitors concerning GN programs, services, facilities or sites.

Social media channel: A website, dedicated Facebook page, Twitter, YouTube account or other electronic means of, or forum for, sharing information on the internet.

Personal information: Information about an identifiable individual as defined in Section 2 of the *Access to Information and Protection of Privacy (ATIPP) Act*. In a social media context this includes an 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 or is a pseudonym (e.g. dogsledder1) that if searched online would produce identifiable information. (For example if you search dogsledder1 on Twitter you might discover the person's first and last name.)

Published information: Comments made by an individual or the posting of information or content to a website that is intended to be accessible to and by subscribers (known as "followers") or the public without the individual's need for, or reasonable expectation of, direct or indirect familiarity, association or relationship with the subscribers or public (e.g. weblog or "blog" postings and comments). This does not include personal online diaries, information or content intended to remain private and within a specific group or where authorization is required to gain access to the information or specific group.

User-created content: Content or information posted to a website, including but not limited to, comments, ratings, reviews, tags, opinions or responses provided by an individual or a group concerning content already posted on the site or the individual's or group's original non-professional creative or modified content that has been posted or published to a website. This type of content is also known as user-generated content or consumer-generated media.

Visitor: Any person who visits, views or reads information on a GN social media site or account irrespective of whether an account and login credentials are required to view or read such information.

## ROLES AND RESPONSIBILITIES

### Executive Council

The policy is issued under the authority of Executive Council with authority to make exceptions and approve revision to the policy.

### Deputy Minister

The Deputy Minister of the Department of Executive and Intergovernmental Affairs (EIA) is responsible to the Minister for the administration of this policy.

### Deputy Ministers

Each deputy minister is ultimately responsible for the information provided to the public from their respective departments in social media.

Deputy Ministers will approve the creation of social media accounts for his/her department and designate an employee to manage the department's social media channel(s).

### EIA Communications

The EIA Communications Division will review social media deployment plans and manage the use of official GN social media accounts.

## **PROVISIONS**

The GN provides information via social media regarding programs, policies, and services offered by the GN. The following are acceptable uses of social media to share information with Nunavummiut:

- links to news releases, speeches, research reports and other documents from the GN;
- office closures due to weather;
- links to relevant information produced and disseminated by other individuals or organizations (such as Inuit organizations, government agencies, researchers or the media);
- relevant facts, quotes, videos or comments related to Nunavut;
- promotional campaigns and related materials; and
- information or instructions to the public during an emergency or other event that disrupts the delivery of government services.

### **Departmental Use of Social Media**

Departments are permitted to have an official presence on third party social media platforms such as Facebook, Twitter and YouTube.

The use of social media must conform to the department's communications plan objectives and must be approved by the department's Deputy Minister.

Departments must prepare a social media deployment plan for consideration by EIA Communications. The plans will identify the approach to be used and the moderator tools provided by the social media platform. The plans must also comply with the provisions in this policy and the GN Corporate Communications Policy.

Departmental social media channels that are posting on behalf of the GN must be registered with EIA Communications.

Deputy Ministers will determine the information to be shared on behalf of that GN department. They will also designate a specific GN employee as a departmental spokesperson to take on the role of managing that department's contribution to social media discussions. The spokesperson must be designated prior to publishing information on GN social media channels.

EIA will review content of deployment plans for quality control purposes. Deployment plans must establish the date or criteria upon which the content and use of the channel will be reviewed or discontinued/removed by the department.

EIA will provide training to ensure that departments understand the broader implications and risks associated with using social media. This training will ensure that only official GN positions are conveyed - personal views will not be posted. Any contractors or agents appointed to GN social media projects will also be required to take this training.

When registering GN social media channels, departments will be required to use a non-personal, government-identifiable name with static contact information, in order to consistently manage control of information should there be a change in personnel.

Departments must establish a legitimate organizational presence when using social media. The GN must post, monitor, respond to, or contribute to social media conversations, in a manner that is identifiable as being by or on behalf of the GN by authorized personnel.

Before posting, designated spokespersons must ensure all content that is posted on a GN social media channel:

- is consistent with the departmental initiative or deployment plan approved by the DM and Communications staff;
- is consistent with official languages legislation; and
- is public information that is appropriate for routine public sharing or is personal information that may be used or disclosed in accordance with the *ATIPP* Act.

Designated spokespersons must monitor the GN 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 or published;
- where possible, modify display settings so that user-created content is off of the primary landing page;
- apply content management standards (set out in Appendix A of this policy), with respect to abusive, hateful, defamatory, anonymous and other inappropriate comments or content, including information that jeopardizes the privacy of others.

Designated spokespersons responding to content on a GN social media channel or contributing on behalf of the GN to other social media channels:

- must identify themselves as a GN spokesperson (name and department);

- must ensure their responses are consistent with approved messaging approved, with actual wording being consistent with the audience or objectives of the site; and,
- must abide by this policy, the Oath of Office and Secrecy, the Code of Values and Ethics, the *ATIPP Act*, the provisions of the GN Internet and Email Use Policy and official languages legislation.

Designated spokespersons, as public servants, remain bound by the following:

- Official Oath of Confidentiality
- Code of Values and Ethics
- Communications Policy
- Internet and Email Use Policy
- GN Official Languages Policy

Designated spokespersons must not do anything online or publish any information or content online that could harm the reputation of the GN or that could be perceived as harmful to the reputation of the GN. They must ensure that any comments on matters of government policy are appropriate to their department and are politically neutral.

These spokespersons must also agree to fully comply with the Content Management Standards appended to this policy. Each designated spokesperson will be required to sign an agreement to confirm compliance.

### **Legal Liability, Copyright and Intellectual Property**

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

Authorization must be sought from artists or named personnel whose works may be posted to GN social media sites. If necessary, consult the Legal and Constitutional Law Division of the Department of Justice for legal advice.

### **Information Management and Technology including Records Management and Security**

Content posted by the GN or a member of the public to a third party social media site is generally managed by the third party social media site according to its own disclosed terms of use.

In compliance with GN policies and processes for the management of electronic records, departments must maintain official recordkeeping systems for all substantive content (e.g. text, images, video and documents) posted by GN employees or agents to a GN social media channel or other site including moderating activities and responses.

## Access to Information and Protection of Privacy

The following issues must be considered before deploying and participating on social media sites:

- The GN will only create official social media channels that have a privacy policy or statement and reputation that are consistent with the privacy provisions reflected in Nunavut's ATIPP Act..
- The GN will promote the protection of citizens' and visitors' privacy by including in its content links to the Information and Privacy Commissioner of Nunavut's website or other information about how to protect one's privacy when using social media.
- The GN 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 the GN 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 GN will only advertise its programs and services on social media sites in accordance with the GN Communications Policy. If any official GN content includes personal information, the use and disclosure of that personal information must be permitted under the *ATIPP* Act.

The collection of identifiable personal information from a social media site and the subsequent use, disclosure and management of that information by GN employees is subject to the privacy protection provisions of Part 2 of the *ATIPP* Act.

- Personal information provided or posted directly by individuals to an official GN social media page/channel/site, or that is posted to another site by that individual, 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 and consent has been obtained in writing.
- Personal information that is posted or shared by individuals on GN social media channels or sites must only be collected by the GN in accordance with Sections 40 - 42 of the *ATIPP* 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, such as sharing with others via email.

- All GN 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 41(2) of the *ATIPP 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.

## **Risk Mitigation**

Departments must be aware of the risks associated with using social media. EIA Communications will provide training to departmental spokespeople in this regard; however, it is noted that the following will require consideration before using social media as a tool for enhancing communications:

- risks and issues regarding public relations (reputation), information management and technology, ATIPP, privacy, legal requirements (liability, protection of copyright, intellectual property and official languages) that may arise by GN and users accessing the social media channel;
- many social media channels own the content on the users' account once uploaded and may use that content as advertising, promotion or in any other way it deems fit;
- potential that GN images, video and other content posted to social media channels can and, likely will be, downloaded and re-used in other ways on other channels, altered or re-posted to the same or other sites. When there is a potential risk of inappropriate reposting, the Department of Justice should be consulted to determine associated risks;
- Nunavummiut and visitors have the means to readily and easily access necessary and important information regarding GN programs, sites, facilities, services and policies, without a need to register as a user of a social media channel. (For example, GN information is directly accessible to unregistered users of a social media site and/or this information is also available on a GN website, or via other channels.);
- public relations and operational risks, IMT (Information Management and Technology including records management and security), privacy and legal considerations (copyright, intellectual property rights, liability and others)
- as necessary, seek input and advice of representatives from EIA Communications, the ATIPP office, the Department of Culture and Heritage and the Department of Justice.

The GN will adhere to provisions contained in relevant legislation affecting communications including:

*Official Languages Act*

*Inuit Language Protection Act*

*Access to Information and Protection of Privacy Act*

## **PREROGATIVE OF CABINET**

Nothing in this policy shall in any way be construed to limit the prerogative of the Executive Council to make decisions or take actions respecting the use of social media outside the provisions of this policy.

## **SUNSET CLAUSE**

This Policy will be effective from the date of signature until January 1, 2020.



## APPENDIX A

### CONTENT MANAGEMENT STANDARDS

#### Responsiveness

The GN will attempt to respond to all posts and comments made on GN social media sites, and will attempt to provide useful information whenever possible, but reserves its right not to do so.

#### Prohibited Content

All posts and comments made on GN social media sites will be moderated and reviewed by the GN. The GN reserves the right to delete any post, comment, or other content at any time and without notice if it is regarded as prohibited content.

The GN does not tolerate any offensive, rude, malicious or abusive posts or comments and reserves the right to edit, remove or refuse to display posts or comments that are contrary to the principles of Nunavut *Human Rights Act*, the Canadian *Human Rights Act* and the *Canadian Charter of Rights and Freedoms*. The GN will delete any posts or comments that are:

- racist, hateful, sexist, homophobic, transphobic, slanderous, insulting, or life-threatening;
- serious, unproven or inaccurate accusations against individuals or organizations;
- aggressive, coarse, violent, obscene, or pornographic;
- not authored by the person posting the comment;
- intended for advertising purposes including announcements from labour or political organizations;
- not written in one of Nunavut's official languages;
- unintelligible or irrelevant messages; or,
- anything else that the GN, in its discretion, determines does not add to the normal flow of public discourse and debate.

Visitors, who repeatedly or purposefully submit posts or comments on GN social media sites that are contrary to these content standards, may be prevented from using GN social media sites. Any hypertext links that violate these standards will also be deleted by the GN.

#### Hypertext Links

Hypertext links to websites not under the control of the GN may appear in posts or in comments submitted by visitors. These links are provided solely for a visitors' convenience.

The GN is not responsible for these links and the content displayed on any other websites. The GN has no external control over these external websites and cannot guarantee the accuracy, completeness, or timeliness of the information located on them. The GN is not responsible for the privacy practices of such websites and advises to review the privacy policies of any linked websites before navigating and disclosing personal information.

There may be circumstances where access to a GN social media site is provided by a hypertext link located on a web page not under the control of the GN. The GN has no responsibility for the content of such other pages and does not guarantee the accuracy, completeness, or timeliness of the information contained on them.

## **Privacy**

To protect the privacy of visitors, the GN recommends that visitors do not include phone numbers or email addresses in the body of posts or comments. Information provided on GN social media sites will be monitored for inappropriate or unnecessary personal information, as well as inappropriate images or inappropriate images of others. The GN adheres to the *Access to Information and Protection of Privacy Act* and undertakes all reasonable steps to ensure privacy provisions are respected.

## **Damages**

In using and accessing GN social media sites, visitors must agree not to hold the GN, its officers, servants, employees and agents liable for any damages whatsoever based upon the visitor's access and use of GN social media sites.

## **Law enforcement**

In the case of on-going law enforcement investigations or legal proceedings, the GN will not comment on any content related to such investigations and may remove any such content posted on GN social media sites.

Visitors shall notify the GN immediately of any legal proceeding based on the activities of or arising out of access and use of a GN social media site or the access and use by others.

## **Amendments**

The GN reserves the right to amend their usage terms at any time without advance notice. Reasonable notice of any changes to the usage terms will be provided in a reasonable manner, within a reasonable time frame.

## **Disclaimer**

GN social media sites and the information contained are provided solely for the convenience of interested visitors. While the GN attempts to ensure the accuracy of the content displayed, it will not be held responsible for any of the content displayed by others.

The personal views of users participating on GN social media sites do not necessarily represent the views of the GN. GN staff will monitor posts and comments, may participate in posts or comments, and may, where necessary, intervene in or remove posts and comments.