



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 814,

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SOCIAL MEDIA POLICY

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I. Purpose

The purpose of this policy is to assist Smithsonian employees, interns, fellows, volunteers, research associates and contractors engaged in social media on behalf of the Smithsonian as part of their duties (“SI Social Media Participants”) at all Smithsonian museums, research centers, offices and programs (SI units), including subordinate organizations, in understanding the legal, policy, and institutional implications of opening and maintaining social media accounts in an official capacity on behalf of the Smithsonian and SI units.

II. Background

Social media has become a vital tool for carrying out the Smithsonian’s mission and strategic plan. However, the speed of dissemination and the informality of social media can also present legal risks as well as risks to the name and reputation of the Smithsonian if not handled responsibly. Social media, and the online environment generally, are rapidly changing; this policy is designed to reflect current practices for the prudent and effective use of social media, and will be updated periodically.

Online activity follows the same standards of conduct, policy directives, and oversight as offline activity. SI Social Media Participants have no expectation of privacy when participating in social

II. Background (continued)

media accounts opened or maintained in an official capacity or when Smithsonian computers and networks are used to engage in social media activities.

The Smithsonian has adopted several policies that apply to participation on social networking sites, including SD 931, Use of Computers, Telecommunications Devices and Networks; SD 950, Management of the Smithsonian Web; IT Security Policy; SD 103, Standards of Conduct; SD 609, Digital Asset Access and Use; Records Management Recommendations; and SD 215, Accessibility for People with Disabilities. Appendix A of this policy specifies the administrative procedures for establishing social media accounts in an official capacity on behalf of, and in the name of, the Smithsonian or SI units.

III. Scope

This directive applies to each SI unit or SI Social Media Participant who, in an official capacity and on behalf of the Smithsonian: (1) opens a social media account in the name of the Smithsonian; (2) posts Smithsonian content on a social media account opened in the name of the Smithsonian; (3) speaks or purports to speak on behalf of the Smithsonian on a social media account; or (4) is responsible for overseeing and maintaining an official Smithsonian presence on a social media site.

Important note about personal social media

activities: This policy is not intended to limit, restrict, or monitor personal social media activities outside of work, using personal computers and other devices. However, the line between public and private, personal and professional, is often blurred in social media. By using a Smithsonian title, identifying oneself as a Smithsonian employee or by other affiliation with the Smithsonian, stating or implying that one's statements are official or endorsed by the Smithsonian, or posting non-public Smithsonian content or other information acquired at work, the interests and reputation of the Institution are potentially affected. Therefore, Section VII of this policy applies to personal social media activities.

IV. Roles and Responsibilities

The Office of Public Affairs (OPA, part of the Office of Communications and External Affairs) establishes, maintains, and monitors the pan-institutional social media sites and, in conjunction with the SI units, periodically monitors selected social media sites established and maintained by the units and offices. Directors of units, offices and programs are responsible for ensuring that their social media sites comply with this policy. OPA also maintains a website, referenced in Appendix A, to provide current information on social media best practices, administrative procedures, metrics, and Smithsonian-approved social media sites.

The Office of the Chief Information Officer (OCIO) is responsible for maintaining the servers, storage, and backups that host social media activities within the Smithsonian information technology (IT) environment. As such, units must consult with the OCIO prior to launching internally hosted social media activities to ensure the future supportability and maintainability of these activities. Contact the OCIOHelpDesk@si.edu for assistance.

The Smithsonian Privacy Officer (SPO) is responsible for reviewing and approving the privacy policies of social media providers prior to the establishment of Smithsonian accounts on new social media sites, periodically reviewing the privacy policies of such sites to ensure compatibility with Smithsonian privacy policies, and working with the Office of General Counsel (OGC) to provide privacy training.

Directors of museums, offices, and programs are responsible for approving the establishment of social media accounts in the name of such museum, office, or program, for ensuring that those who establish the accounts notify OPA and Smithsonian Institution Archives (SIA) of the account and Social Media Point of Contact for that account, and for ensuring that those who, in an official capacity, establish and post content to such social media sites comply with the terms of this policy. Directors may delegate responsibility for social media to Web and new media staff or others who will be responsible for ensuring compliance with this policy.

IV. Roles and Responsibilities
(continued)

The Office of Contracting and Personal Property Management (OCon&PPM) is responsible for reviewing and approving the contractual terms and conditions of social media sites as well as maintaining the Approved Social Media Provider List on a website referenced in Appendix A.

The Smithsonian Institution Archives (SIA) is responsible for maintaining a current and complete SI Website and Social Network Registry of Smithsonian social media sites on a website, referenced in Appendix A, and for archiving information contained on such sites in accordance with applicable records management and retention policies and industry archival standards.

The Office of General Counsel (OGC) provides legal advice in connection with the establishment of social media sites and legal issues arising from the posting of content on such social media sites. The OGC also provides training in intellectual property, privacy, ethics, and related matters to those responsible for Smithsonian social media sites.

SI Social Media Participants are responsible for complying with this policy, other applicable SI policies, and for ensuring compliance with the contractual terms and conditions imposed by the specific sites on which they have opened accounts and for which they are responsible.

V. Definitions

The Social Media Point of Contact (Social Media POC) is the person who is designated by the director, or his or her designee, to notify SIA and OPA of the establishment of the account, is listed as the point of contact on the SI Website and Social Network Registry, serves as the point of contact for communications from OPA and SIA for the account, and closes social media accounts, when appropriate.

Approved Social Media Provider List is a current and complete list of social media providers whose terms and conditions and privacy policies have been reviewed

V. Definitions
(continued)

and approved by OCon&PPM and the SPO. The List is maintained on a website referenced in Appendix A. SI Social Media Participants may open new accounts with the providers on this list without seeking additional OCon&PPM approval.

Personally Identifiable Information (“PII”) is information about individuals maintained by the Smithsonian, including information which can be used to distinguish or trace an individual’s identity and any other information that is linked or linkable to an individual, such as medical, educational, financial or employment information. Examples of PII include, but are not limited to: (a) general personal data such as full names, maiden names, aliases, and full dates of birth; (b) address information such as street and email addresses; (c) personal identification numbers such as Social Security number, passport, driver’s license, taxpayer identification, financial account, and credit card numbers; (d) security information such as passwords, mother’s maiden names, etc.; and (e) personal characteristics that identify individuals, fingerprints, handwriting, etc., or biometric data such as retina scans, voice signatures, and facial geometry.

Social media is an umbrella term that encompasses websites that integrate technology, social interaction and content creation and dissemination. Social media includes a variety of forms such as blogs, wikis, photo and video sharing, podcasts, social networking, mash-ups and virtual worlds.

SI Website and Social Network Registry: A current and complete list of social media accounts opened by SI Social Media Participants, which is maintained by SIA. The Registry is maintained on a website referenced in Appendix A.

VI. Policy

Social media accounts should be used as part of a strategy for supplementing and enhancing content available on Smithsonian websites, reaching and engaging existing and new audiences, and carrying out the Institution’s strategic plan. SI units should consider

VI. Policy (continued) their mission-related goals, target audiences, staff and other resources, level of user engagement, comment moderation practices, means of measuring success and records management practices before opening and maintaining official Smithsonian social media accounts.

Social media accounts should not be used to create obstacles to public access to free Smithsonian content, which should continue to be posted on the primary Smithsonian websites when practicable. Once opened, social media accounts should be used and updated regularly, improved as needed, and evaluated periodically against the goals of the unit, program or office. When no longer used, social media accounts should be closed, with notice to the community as appropriate, and content should be archived or deleted, consistent with Smithsonian archival practices.

Once the decision is made to open and maintain a social media account in the name of the Smithsonian, such accounts must be established and maintained in accordance with the administrative procedures set forth in Appendix A and content-related principles set forth below. Once the account is established, all content posted by SI Social Media Participants must conform to the requirements set forth in subsection A below. In addition, subsection B contains recommended guidelines for official Smithsonian social media accounts. Subsection C provides requirements for overseeing and managing user-generated content that is posted on official Smithsonian social media accounts.

- A. Requirements for Smithsonian-Posted Content on Social Media Sites. The following conditions apply:
- Content must not be posted that is unrelated to the Smithsonian mission, partisan or political, personal, contains personal attacks, is abusive, threatening, unlawful, harassing, discriminatory, libelous, obscene, false, or pornographic, infringes on the privacy or other rights of any third party, or otherwise falls within the prohibited categories set forth in SD 931, Use of

VI. Policy (continued)

Computers, Telecommunications Devices and Networks;

- Prior to posting content on Smithsonian Social Media sites, each SI Social Media Participant is responsible for ensuring that the content is free and clear of any restrictions, as set forth in SD 609, Digital Asset Access and Use, and for checking necessary provenance and other related records that might indicate restrictions.
- Content with known restrictions, such as copyright, trademark, privacy, contractual, or other restrictions as set forth in SD 609, Digital Asset Access and Use, must not be copied and posted on Smithsonian social media accounts; however, if such content is lawfully posted on a third party's social media site, linking from Smithsonian social media sites to such third-party site is permitted. For questions about restricted content, consult OGC prior to posting;
- For content the Smithsonian does not own or have permission to use, is not in the public domain, or, when the posting does not satisfy the fair use test under copyright law, permission must be obtained from the rights-holder(s) before posting third-party content on a Smithsonian social media site. For questions about copyright law, contact OGC;
- For content that requires prior permission from a rights-holder to be posted (e.g., under the terms of a contract, license, or release), the SI Social Media Participant must maintain a retrievable record of the clearance process;
- Content must not be posted that is confidential, proprietary, pre-decisional, internal, or otherwise not intended for public dissemination, including but not limited to financial information;

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- Political or religious messages or endorsements of political parties, candidates or groups, or comments that might be construed as lobbying must not be posted;
- Express or implied endorsements of non-Smithsonian products, services or entities, including contractors and their products and services, are not permitted;
- Recognition of donors and sponsors and the inclusion of sponsorship benefits, such as cause-related marketing, is only permitted in accordance with an approved sponsorship agreement (contact the Office of Advancement for assistance);
- Advertising and promotion of third parties and their products or services are permitted on Smithsonian social media sites only in accordance with SD 950, Management of the Smithsonian Web;
- E-commerce and sales of Smithsonian merchandise are permitted on Smithsonian social media sites to the same extent as on Smithsonian websites;
- Content must not be posted if it violates a person's privacy or includes personally identifiable information ("PII"), unless (a) prior consent has been obtained from the owner of PII; (b) the information is posted automatically when certain social media sites are used, such as a Twitter alias or an image and name that appear in conjunction with Facebook postings; (c) an artist's name, year of birth, and other publicly available information is posted in connection with SI exhibitions, programs and activities; or (d) the posting is otherwise consistent with Smithsonian privacy policies and practices. For questions about posting PII, contact the Smithsonian Privacy Officer at privacy@si.edu;

VI. Policy (continued)

- Photographic images of adult members of the public may be posted for non-commercial use if: (a) the image consists of a crowd shot in a public place; (b) the subject(s) featured prominently in the image have granted written consent to use the image; (c) the images were taken at an event that provided conspicuous notice through signage or public announcements to the public that photographs would be taken and used publicly; or (d) the subjects are deceased;
- Photographic images of recognizable children who appear to be under age 18 should not be posted unless a parent and/or guardian has given written consent to post the image; in consultation with OGC, exceptions may be justified for non-commercial use of crowd shots in which children are present;
- Calls for entries, contests, give-aways, or sweepstakes on social media sites require prior review by OGC if a tangible prize will be awarded; and
- Links from Smithsonian social media accounts to third-party websites shall conform to the linking rules set forth in SD 950, Management of the Smithsonian Web.

B. Recommended Guidelines for Smithsonian-Posted Content on Social Media Accounts

- The tone of Smithsonian social media accounts should be professional, dignified, and respectful. A conversational and friendly tone is permissible and encouraged. Spelling and grammar should be correct, unless the specific type of social media (e.g., Twitter) uses a different convention such as abbreviations, acronyms, or alternative language formats. The tone should not be overly informal or use slang, jargon, profanity, or other language that is not in keeping with the dignity and reputation of the Smithsonian. Remember that an important purpose of social media activity is to add value to the name and reputation of the

VI. Policy (continued)

Smithsonian and everything published on an official Smithsonian account reflects upon the Institution;

- Content should be as accurate and reliable as possible; where content cannot be authenticated or confirmed for accuracy, or is preliminary or incomplete due to gaps in information or other circumstances, users should be informed of this;
- If a mistake is made, it should be corrected in an honest and transparent manner;
- Where appropriate, audience comments and questions should be addressed promptly; some comments or questions may require consultation with OPA, OGC or other Smithsonian units prior to preparing a response;
- If posted content is obtained from a source other than the Smithsonian, appropriate credit and attribution to the source of the content should be provided; other people's work should not be plagiarized or infringed;
- Where possible within the established community practices of third-party social media providers, Smithsonian content should be posted with descriptive information, such as creator names, date, any applicable restrictions, and, for Smithsonian content, identity of holding unit and contact information;

C. Requirements for User-Generated Content on Smithsonian Social Media Accounts:

- When a social media account under the operation and control of the Smithsonian invites user comments and content, such account shall notify users that, among other things, their comments may be monitored, content may be removed, and their activity on the account is subject to the Smithsonian's terms of use and privacy policy. Sample notice language is

VI. Policy (continued)

included in Appendix A and may be incorporated into the social media account directly or the notice may be provided by a link to www.si.edu/termsfuse;

- **For all official Smithsonian social media accounts, whether hosted on si.edu or operated and controlled by a third party (e.g., Facebook),** each SI Social Media Participant is responsible for (a) actively monitoring all user-generated content at intervals determined appropriate by the Smithsonian unit, program or office in accordance with the applicable community guidelines, but not later than one business day after posting; (b) deleting content that violates the Smithsonian's posted comment policy (www.si.edu/termsfuse#/user-gen); (c) responding to questions; and (d) engaging the community in ways appropriate to the purpose, terms, and conditions of the site. If questions arise about user-generated content, contact OGC.
- All PII received from social media users must be treated in a manner that is consistent with applicable Smithsonian privacy policies and procedures, as may be updated from time to time, and with the social media platform's terms and conditions and community guidelines. If questions arise, contact the Smithsonian Privacy Officer at privacy@si.edu;
- For third-party sites on which the Smithsonian maintains a presence and which make user activities, preferences, or affiliations available to the Smithsonian based on a site-viewing relationship (e.g., "fans," "friends," or "followers"), the site should not be used by SI Social Media Participants to browse or collect personally identifiable information without the user's express consent.

VII. Personal Social Media Activities

Personal social media activities may be conducted on Smithsonian computers, telecommunications devices and networks only on an incidental and occasional basis, provided such activity does not interfere with the conduct of normal Institution business and meets the requirements of SD 931, Use of Computers, Telecommunications Devices and Networks. Official email addresses may not be used to set up a personal social media account. However, employees and others covered by this policy may use their official title, Smithsonian affiliation, or official email address for mere professional identification or biographic data on a personal social media site (e.g., LinkedIn or Facebook) consistent with the requirements of SD 103, Smithsonian Institution Standards of Conduct.

When publishing content to a personal social media account, employees and others covered by this policy must avoid stating, implying, or creating the impression that they are speaking in an official capacity on behalf of the Smithsonian or that their activity is endorsed by the Smithsonian. When posting comments that pertain to the Smithsonian, an effective way of distinguishing personal views from matters that fall within Smithsonian duties is to include a disclaimer in connection with personal social media activities, to make it clear that the views expressed are personal views and not those of the Smithsonian.

Further, employees and others covered by this policy, who are acting in their personal capacity must not disclose information derived from Smithsonian employment that is privileged, confidential, private, sensitive, non-public, pre-decisional or in violation of any rights, such as copyright. See SD 103, Standards of Conduct, for more information in this area.

Anonymously posting information about the Smithsonian is strongly discouraged, as are using pseudonyms or false screen names. With all social media activities, and regardless of whether acting in a personal or professional capacity, use common sense and good judgment: It is best to assume that comments and other postings will become public regardless of whether they are intended to remain private.

VIII. Penalties

Penalties for violations of this policy may include closure of a social media account, personal disciplinary action up to and including suspension without pay and termination of employment administered in accordance with Smithsonian personnel policies and procedures. Illegal activities will be reported to law-enforcement authorities for prosecution and punishment as provided by law.

CANCELLATION:

Not applicable.

INQUIRIES:

Office of Communications and External Affairs (OCEA)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue