Social media is a term used to describe on-line technologies, applications and practices that are used to share information, knowledge and opinions (e.g. social networking sites, blogs, wikis, content sharing sites, photo sharing sites, and video sharing sites). Well-known platforms include Facebook, Twitter, Instagram, YouTube, Reddit, Pinterest and LinkedIn.

## Why Do Public Bodies and Custodians Use Social Media?

For public bodies and custodians social media can encourage interaction and discussion with the public. Possible uses of social media by public bodies and custodians may include:

- giving relevant public alerts;
- sharing information about upcoming events;
- distributing photos of previous/on-going events;
- as a sounding board for ideas/proposals;
- sharing statistics;
- providing useful information to citizens and clients;
- a forum for engagement and discussion;
- promoting existing initiatives or policies;
- notifying users of further opportunities for discussion.

In any use of social media, it is paramount that public bodies and custodians properly manage and protect the privacy of personal information. Responsibilities and obligations within a digital medium are no different than those in relation to other records. Public bodies and custodians should have a written policy in place surrounding the use of social media, including who may post to social media, the type of information that may be communicated via social media, and the platform(s) that may be used.

## Who Should be Authorized to Use Social Media?

The number of persons who are authorized to post to social media on behalf of a public body or custodian should be limited. Ideally, ATIPP Coordinators or Privacy Managers should oversee any such posts.

## What Can a Public Body or Custodian Post to Social Media?

Personal information and personal health information should generally never be collected through or disclosed on social media.

If personal information or personal health information is posted or disclosed contrary to statutory privacy obligations, promptly remove the information and alert your ATIPP Coordinator, and the OIPC. You should also consult the *ATIPPA, 2015* and *PHIA* for breach protocol and notification provisions.

Information published by a public body or custodian on their social media platform may be subject to an access request under the *ATIPPA, 2015.*

Social media should not be used as a method of communicating with individuals about their own or other people's personal information or personal health information.

### When Should Public Bodies and Custodians Consider Using Social Media?

Information should only be posted to social media at the direction of the head of the public body or custodian, or another authorized individual and only after ensuring that the post complies with any social media, IT or communications policy of the public body or custodian, and all applicable provisions of *ATIPPA, 2015* and *PHIA*.

Also, before posting, consider the immediate and permanent nature of the post. Posts are immediately available and may become more publicly shared than you intend.

### Where to Make Social Media Posts.

It is advisable to use a limited number of platforms so that they can be actively monitored and maintained. Public bodies and custodians should delete any social media accounts that are inactive or unmoderated.

We also suggest that you do the following to help ensure your social media use complies with the *ATIPPA, 2015* and *PHIA*.

- Complete a Privacy Impact Assessment.
- Include on your posted collection/use/disclosure notice the platforms which you use.
- Use a moderator to remove any unsolicited comments, or information about anyone other than the person posting.
- Review and use privacy settings. Most major social media sites allow you to control how visible your information is on the site.
- Protect social media accounts from being hijacked. Use strong password protection.