Records Management and Social Networking Sites

The purpose of this document is to provide guidance to state and local government agencies regarding the retention of public records of posts to social networking sites such as blogs, wikis, Facebook, Twitter, YouTube, etc.

Agencies need to consider the following five factors when managing the retention of their public records created or received through social networking sites.

1. Are the posts public records?
If posts are made or received in connection with the transaction of the agency’s public business (such as providing advice on or receiving comments about the agency, its programs, core business, etc.), then they are public records and need to be retained for their full retention period.

2. When are posts a copy or non-record?
If the posts duplicate records that the agency is already retaining (such as publications, documents stored on a network drive, etc.), then the posts may be considered copies. If the posts do not exist elsewhere, such as comments made by members of the public, the posts are the agency’s record.

3. How long do posts determined to be records need to be retained?
Retention is based on content, not format. Agencies should use the records series for a post that they would use if the same information was distributed in a letter or an e-mail. Agencies need to retain their primary record of posts for their full period specified in the appropriate records retention and disposition schedule.

4. How should the agency retain the posts?
Agencies need to determine how they will retain the posts that are under their custody and control. When control of the posts is outside of the agency (as with Facebook or Twitter as opposed to an agency created blog), the agency needs to consider what other records they can retain, such as confirmations of each post/comment or screenshots. Agencies should consider these issues when reviewing service contracts of social networking sites, as well as the settings configuration within each of their social networking accounts.

5. For which types of records is this technology appropriate?
Agencies should determine the business activities for which social networking technology is appropriate and put a policy in place before creating any social networking accounts. Refer to the Virginia Department of Human Resource Management Policy 1.75 – Use of Electronic Communications and Social Media for further guidance.

Records Analysis Section
www.lva.virginia.gov/agencies/records/