



MANAGEMENT OF OFFICIAL SMITHSONIAN SOCIAL MEDIA ACCOUNTS

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[Appendix A: Administrative Procedures for
Establishing Social Media Accounts](#)

I. PURPOSE

The purpose of this policy is to provide guidance to Smithsonian Institution (SI) employees who open, maintain and post Smithsonian-related content on social media sites as part of their official duties. These social media sites are deemed to be Official Smithsonian Social Media Accounts when opened and maintained for official purposes. This directive provides the legal, policy, and institutional implications of establishing, maintaining and posting content on Official Smithsonian Social Media Accounts on behalf of the Smithsonian and its units, programs and activities. Appendix A of this policy specifies the administrative procedures for establishing Official Smithsonian Social Media Accounts on behalf of, and in the name of, the Smithsonian and SI units.

II. BACKGROUND

Social media is a vital tool for carrying out the Smithsonian's mission and strategic plan. Employees who use social media are speaking directly to the public on behalf of the Smithsonian. This is a major responsibility, one that must achieve a unit's engagement and outreach goals while avoiding legal or reputational risk for the Smithsonian. It requires the highest standards of editorial accuracy and industry best practices. Any employee or affiliated person (as defined on page 6) who uses social media must follow the same standards of conduct, policy directives, and oversight as he or she does in conducting offline activities.

II. BACKGROUND (continued)

In addition to this policy, several other Smithsonian policies apply to participation on social networking sites, including: [SD 931](#), Use of Computers, Telecommunications Devices and Networks; [SD 950](#), Management of the Smithsonian Web; [SD 103](#), Smithsonian Institution Standards of Conduct; [SD 609](#), Digital Asset Access and Use; [Records Management Recommendations](#); [SD 118](#), Privacy Policy; [SD 300](#), Use of Funds for Lobbying Purposes; [SD 323, Use of Funds Handbook](#); and [SD 215](#), Accessibility for People with Disabilities.

III. SCOPE

This directive applies to Smithsonian employees and affiliated persons (as defined on page 6). Engagement in social media on behalf of the Smithsonian can include one or more of the following activities:

1. opening an Official Smithsonian Social Media Account in the name of the Smithsonian;
2. posting or drafting Smithsonian-related content on an Official Social Media Account opened in the name of the Smithsonian;
3. speaking, purporting to speak, or creating the reasonable impression of speaking on behalf of the Smithsonian on any social media account; and/or
4. being responsible for oversight, management, and maintenance of an official Smithsonian presence on an Official Smithsonian Social Media Account.

This policy is not intended to apply to personal social media activities, or to limit, restrict, or monitor personal social media activities conducted outside of official duties in a private capacity using personal computers and other devices. The Smithsonian does not monitor its employees' personal social media presence. However, the line between public and private, personal and professional, is often blurred in social media, and whether social media use is considered personal or official is a fact-specific analysis. Remember that 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 confidential information acquired as part of employment, it can appear that the statements on your personal account are being made in an official capacity, which could subject the social media activity to this policy, [SD 103, Smithsonian Institution Standards of Conduct](#) and all other applicable Smithsonian policies. For additional information, please review the Office of Communications and External Affairs' (OCEA) [frequently asked questions](#).

IV. ROLES AND RESPONSIBILITIES

The **Office of Public Affairs (OPA)**, part of the OCEA, establishes, maintains, and monitors the flagship “Smithsonian” brand 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 the [Social Media Handbook](#) and the Social Media Listserv, and provides regular counsel and training to units to ensure they are following established best practices for social media and upholding the reputation of the Smithsonian.

The **Office of the Chief Information Officer (OCIO)** provides a tool that is available to assist with the management of social media accounts, collects select analytics for reporting on the Smithsonian Dashboard, manages the Technical Review Board (TRB), which, at the request of one or more units, evaluates and approves new social media platforms for use by the Institution, and establishes resource accounts used for social media accounts.

The **Office of Contracting and Personal Property Management (OCon&PPM)** is responsible for reviewing and approving the terms of use, and other contractual terms, of social media providers prior to the establishment of new Smithsonian accounts with social media providers for Smithsonian use (see Appendix A). OCon&PPM also maintains the [SI Approved Social Media Providers List](#), along with relevant guidance for approved use of each social media platform, which is available on the [OCon&PPM Prism website](#).

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 providing privacy training as appropriate.

Directors of SI museums, research centers, programs, and offices (Unit Directors) are responsible for approving the establishment of social media accounts in the name of such a museum, office, or program, for ensuring that their social media sites comply with this policy, for ensuring that those who establish the accounts notify OPA and the Smithsonian Institution Archives (SIA) of the account, and Social Media Manager for that account, and for ensuring that those who establish and post content to social media sites comply with the terms of this policy. Directors may delegate responsibility for social media management to a department or one specific individual who will be responsible for ensuring the unit’s compliance with this policy, such as the unit’s public affairs, communications or digital outreach department or a staff member within that department.

IV. ROLES AND RESPONSIBILITIES (continued)

A Social Media Manager is a person who is responsible for the administration of an Official Smithsonian Social Media Account. This person is designated by the Unit Director, or by the department the director designates as responsible for overseeing social media at the unit. This person must notify SIA and OPA of the establishment of new accounts, is listed as the point of contact on the SI Website and Social Network Registry, and serves as the point of contact for communications from OPA and SIA for the account, and closes social media accounts, when appropriate. In addition to compliance with this policy, Social Media Managers are also required to read and follow the *Social Media Handbook* that is frequently updated with specific best practices for this quickly evolving medium.

Smithsonian employees and authorized contractors who post to SI social media sites as part of their official duties are responsible for following the guidance of this policy and the [Social Media Handbook](#).

Smithsonian Institution Archives is responsible for maintaining the current and complete SI Website and Social Network Registry of Official Smithsonian Social Media Accounts, 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.

V. DEFINITIONS

The **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 and approved by the OCon&PPM and the SPO. SI Social Media Managers may open new accounts with the providers on this list without seeking additional OCon&PPM approval. The [list](#) is maintained on Prism.

The **Official Smithsonian Social Media Account** is a social media account that is opened, maintained and managed for the purpose of posting official Smithsonian-related content. These accounts are managed by a Social Media Manager designated by the respective Smithsonian unit, program or activity.

Personally Identifiable Information (“PII”) is information about living individuals which may or may not be publically available, that can be used to distinguish or indicate an individual’s identity, and any other information that is linked or linkable to a living individual’s identity, such as medical, educational, financial or employment information. Examples of PII include, but are not limited to:

- General personal data: full name, maiden name, alias, full dates of birth;

V. DEFINITIONS (continued)

- Address information: street address or email address;
- Personal identification numbers: Social Security Number, passport number, driver's license number, taxpayer identification number, financial account number, or credit card number;
- Security information: passwords, mother's maiden names; and
- Personal characteristics: photograph or voice file that identifies an individual, fingerprints, handwriting, or biometric data such as retina scan, voice signature, or 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 and platforms such as blogs, Facebook, Instagram, YouTube and other similar services.

The ***Social Media Handbook*** is a resource containing best practices that all Social Media Managers, contractors who render services related to social media, and individuals posting to Official Smithsonian Social Media Accounts should follow.

The **SI Website and Social Network Registry** is a current and complete list of Official Smithsonian Social Media Accounts, which is maintained by SIA. The Registry is maintained on a website referenced in Appendix A.

VI. POLICY

Official Smithsonian 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 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. While it is fine to share information differently on different platforms, units should avoid releasing public information solely on a social media platform that is accessible only to those who have registered with the platform.

Only Smithsonian employees, or contractors who render services directly related to social media, may open or administer an Official Smithsonian Social Media Account. Please refer to the *Social Media Handbook* for the latest best practices that all Social Media Managers and individuals posting or contributing to Official Smithsonian Social Media Accounts should follow.

VI. POLICY (continued)

Once opened, Official Smithsonian 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, Official Smithsonian 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 an Official Smithsonian Social Media Account, such accounts must be established and maintained in accordance with the administrative procedures in Appendix A. Once the account is established, all Smithsonian-posted content must conform to the requirements set forth in subsection A below. Subsection B 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 Official Smithsonian Social Media Sites

The following conditions apply:

- Only Smithsonian employees or contractors who render services directly related to social media are allowed to manage an Official Smithsonian Social Media Account. **Interns, volunteers and other Affiliated Persons¹ are not allowed to manage or oversee an Official Smithsonian Social Media Account.** Interns, volunteers and other Affiliated Persons may contribute to social media by developing and writing content, but all social media posts must be reviewed by Smithsonian employees and contractors who hold responsibility for the Official Smithsonian Social Media Account.

¹ For the purposes of this directive, **Affiliated Persons** refers to the following categories of individuals who are not SI employees, but who are regularly present and/or work within SI facilities and property, including leased facilities and property:

- Volunteers, as defined in [SD 208](#), Standards of Conduct Regarding Smithsonian Volunteers
- Interns, as defined in [SD 709](#), Smithsonian Institution Internships
- Fellows, as defined in [SD 701](#), Smithsonian Institution Fellows
- Emeriti, as defined in [SD 206](#), Emeritus Designations
- Friends of the National Zoo (FONZ)
- Visiting researchers, including scientists, scholars, and students
- Research Associates, as defined in [SD 205](#), Research Associates
- Employees of federal, state, and local agencies working with SI employees at SI facilities and property
- Regents and advisory board members

VI. POLICY (continued)

- The Smithsonian does not post content that is unrelated to the Smithsonian mission, that is 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 Computers, Telecommunications Devices and Networks. Please refer to the *Social Media Handbook* for specific examples of content that violate these guidelines.
- Prior to posting content on Official Smithsonian Social Media Accounts, each Social Media Manager 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. For questions about whether content is restricted, contact the Office of General Counsel (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 an Official Smithsonian Social Media Account. 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 Social Media Manager 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, unless an exception has been granted by an appropriate official (e.g., when the head of a unit public affairs office approves the use of behind-the-scene images).
- Political or religious messages or endorsements of political parties, candidates or groups, or comments that might be construed as lobbying must not be posted; please see the *Social Media Handbook* for specific examples of content that violate these guidelines.
- Express or implied endorsements of non-Smithsonian products, services or entities, including contractors and their products and services, are not permitted; Please see the *Social Media Handbook* for specific examples of content that violate these guidelines.

VI. POLICY (continued)

- 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.
- E-commerce and sales of Smithsonian merchandise are permitted on Smithsonian social media sites to the same extent as on Smithsonian websites.
- Fundraising activities, including donation asks that link to Smithsonian-approved donation forms, 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 written consent has been obtained from the owner of the 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) a living individual's name and month/day/year of birth 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.
- 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, giveaways, or sweepstakes on social media sites require prior review by OGC if a tangible prize will be awarded.
- Links from Official Smithsonian Social Media Accounts to third-party websites shall conform to the linking rules set forth in [SD 950](#), Management of the Smithsonian Web.
- If a mistake is made, it should be corrected in an honest and transparent manner.

VI. POLICY (continued)

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

- All Official Smithsonian Social Media Accounts are required to link to www.si.edu/termsfuse unless it is not possible and include a link to the Smithsonian Privacy Statement at www.si.edu/privacy and/or customized privacy language.
- For all Official Smithsonian Social Media Accounts, each Social Media Manager is responsible for actively monitoring all user-generated content at intervals determined appropriate by the Smithsonian unit, program or office in accordance with the applicable community guidelines. Actively monitoring Official Smithsonian Social Media Accounts includes, but is not limited to, (a) deleting content that violates the Smithsonian's posted comment policy (www.si.edu/termsfuse#/user-gen); (b) responding to questions; and (c) engaging the community in ways appropriate to the purpose, terms, and conditions of the site. If questions arise about user-generated content, contact the Social Media Specialist in the Office of Public Affairs.
- Social Media Managers are allowed to "mute" specific inflammatory words and expletives from appearing on their Official Smithsonian Social Media Accounts, such as their Twitter feeds, Facebook page or YouTube Comments.
- 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 Social Media Managers to browse or collect personally identifiable information without the user's express consent. For questions regarding how to obtain a user's express consent, contact the Smithsonian Privacy Officer at privacy@si.edu.
- Content must also meet standard guidelines for accessibility for people with disabilities. The General Services Administration maintains a guide for accessible video and social media with other best practices to follow:
<https://www.section508.gov/content/build/create-accessible-video-social>

VII. PENALTIES

Penalties for violations of this policy may include, as appropriate, closure of a social media account, as well as remedial or disciplinary action. Such action may include a change in assigned duties, appropriate training or counseling, suspension, and/or dismissal, termination of employment, discontinuance of volunteer service, termination of a contract or appointment, or any other action the Smithsonian deems appropriate. Illegal activities will be reported to law-enforcement authorities for prosecution and punishment as provided by law.

SUPERSEDES: SD 814, issued on November 2, 2011.

INQUIRIES: Office of Communications and External Affairs (OCEA).

RETENTION: Indefinite. Subject to review for currency 36 months from date of issue.
