

Practice Guideline: Social Media

Members of the College of Occupational Therapists of Nova Scotia are accountable for the practice they provide to the public. Guidelines are issued by the College for the assistance of the professional. They represent guidance from the College on how members should practice. Guidelines are intended to support, not replace, the exercise of professional judgment by therapists in particular situations.

Statement of Purpose

The purpose of this guideline is to provide occupational therapists with a decision-making process, using a risk management framework, when using social media and to suggest strategies considered good practice to minimize risk. The College of Occupational Therapists of Nova Scotia encourages its members to use this decision-making process when considering the use of social media for professional and personal use. By using such an approach, occupational therapists will ensure protection of the public and minimize professional liability.

Background and Definition

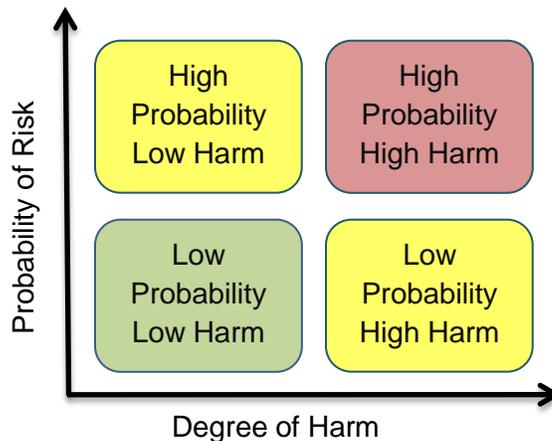
Social media refers to technologies, platforms, and practices that enable people to create, use, and share content, opinions, information, experiences and perspectives, build relationships and promote discussion. Social media's content and interaction are user-generated. Examples include but are not limited to: Facebook, Twitter, LinkedIn, Drop Box, Google +, Pinterest, YouTube, Instagram, Snapchat, blogs, and message boards. For this document's purposes, e-mail is not considered social media; readers are directed to the College's Practice Standards on Recording Keeping for more information.

With the increased use of social media for personal and professional purposes, there has been increasing concerns and incidences of professional misconduct. Occupational therapists are expected to maintain reasonable conduct at all times. They may be held responsible for comments or behaviours outside the work environment as they may reflect poorly on the profession as a whole. Any use of social media must abide by legislation and the College's code of ethics, standards, and principles. Occupational therapists are also required to follow organizational policies where they exist.

Risk Management Framework

Risk management framework is a tool that encourages registrants to identify benefits and risks associated with using social media, assess the probability of risk and degree of harm to the profession and the public, and take steps to mitigate any associated risks. Risk may be

avoided, shared, reduced, or accepted. Risk management is a cyclical process, requiring on-going monitoring and review.



Benefits and Risks

Social media may afford certain benefits to occupational therapists. It can foster collegial relationships and professional consultation, dissemination of information, allow for continuing education and professional development, and coordination and improvement of client care. However, social media also imposes possible risk to the professional and the public. Risk may include:

- *Crossing of professional boundaries:* therapeutic relationships should be the same on-line as they are in person
- *Conflict of interest:* clients posting testimonials on a social media page is against the College's advertising standards. Additionally, posts that may be construed as support for a particular product or company may be deemed a potential conflict of interest
- *Breach of confidentiality and privacy:* the sharing of client identifiable information constitutes a breach under the Personal Health Information Act (PHIA). Identifying information is defined in PHIA as "where it is reasonably foreseeable in the circumstances, could be utilized, either alone, or with other information, to identify an individual." Under this definition, a client posting on a professional social media page may constitute a breach if it identifies the individual as a client.
- *Trust and confidence in the professional or the profession as a whole:* Unprofessional behaviour that can be attributed to a registrant reflects poorly on the College and the profession as a whole. Occupational therapists are expected to maintain reasonable conduct at all times in their professional and private lives. Use of social media that does not reflect this may be deemed as professional misconduct. Whenever a registrant uses a professional designation online, they are viewed as acting in a professional capacity.

The probability of harm will largely depend on the social media platform and security settings used, where the degree of harm will largely reflect the content.

Risk Mitigation Strategies

Listed below are strategies considered good practice for Occupational therapists to minimize risk:

Professional Boundaries

- Keep your personal and professional social media pages separate to clearly establish and maintain professional boundaries
- Do not “friend” or accept “friend” requests from clients on your personal social media accounts
- As with face-to-face relationships, set and communicate these boundaries with clients online
- Use social media’s privacy settings to restrict access and use on personal accounts

Conflict of Interest

- Do not post or like third-party suppliers, vendors or other private companies pages; do not post information from these companies on your professional page
- Follow college guidelines regarding advertising when using social media
- Advise clients not to post testimonials before engaging them on social media; if a client posts a testimonial, review with that client and request that it be removed
- All communications must be factual, accurate, and transparent

Confidentiality and Privacy

- Obtain informed expressed consent before engaging clients on social media; consent must outline the risk and benefits and foreseeable consequences
- Do not post personal health information or identifiable information on social media
- Do not use testimonials as they identify a client and are against the College’s advertising standards
- Assume information posted is public and accessible
- Communicate face-to-face or voice-to-voice with clients where possible; consider taking the conversation offline after three online interactions
- Read all privacy and confidentiality agreements with social media sites prior to agreeing to terms of use

Trust and Confidence

- Whether on a personal or private page, use the principle “pause before you post, check before you click.” Before you save, send, or post a photo or comment, take a brief moment to review the content and only post what you are willing to make public
- Use privacy settings to restrict access and use
- Review what is out there frequently; complete an online search for yourself and review the content online

- Assume information posted is accessible to the public
- Maintain a risk file: keep records of events of potential risk and steps taken for a paper trail
- Avoid plagiarism when posting content

Conclusion

By following the guidelines within this document, occupational therapists take steps to protect the public while reducing risk of professional misconduct for themselves.

References

Pause before you post: Social media awareness for regulated health professionals. College of Occupational Therapists of Ontario, <https://www.coto.org/story.html>

Personal Health Information Act (2010).

Practice guideline: Using social media. College of Occupational Therapists of Ontario, February 2014.

Social media use: Common expectations for nurses. International Nurse Regulator Collaborative, August 2014.