College of paramedics

Social Media Guidance

The purpose of the College of Paramedics Social Media Guidance is to provide advice in relation to the personal and professional use of social media. It aims to increase understanding of the legal, regulatory and professional framework relating to social media and the potential consequences, both personal and professional, of inappropriate use.

leading the development of the paramedic profession

CONTENTS

Social Media Guidance

PURPOSE

The purpose of this guidance is to clarify the College of Paramedics' position on the professional responsibilities of paramedics and student paramedics in relation to social media. It provides advice on how to develop appropriate behaviours in relation to personal and professional use of this technology. It also outlines the personal and professional consequences of inappropriate use of social media.

The guidance explores the relevant legal, regulatory, and professional framework which governs the use of social media in the health and social care context.

The guidance will be regularly updated as the dynamic nature of social media evolves and will be published on the College of Paramedics' website.

Social Media Guidance

CONTEXT

The use of social media is set to expand. Many people now use social media to interact with each other and to learn about each other. Modern healthcare professionals need to find ways to embrace this technology to connect and help deliver innovative services, whilst upholding their professional, legal and regulatory responsibilities.

The use of social technology and networking enables people to collaborate, build relationships and share information and resources. 'e-professionalism' goes beyond just online communication, and increasingly involves the ability to understand and use social media. This includes the development and management of online personas including online postings and interactions, blogs, images, videos, tweets, and more.

As well as providing many benefits, social media also presents challenges for professionals as it can blur the boundaries between personal and professional life. Websites such as Facebook provide 'privacy settings' which allow some control of the visibility of postings. However, social media sites are very rarely closed or secure. Inappropriate use of social media can have drastic consequences for your reputation and could negatively impact on both your professional status and employment prospects.

Social media exists in the public domain and you must remain aware that whilst online you continue to represent the paramedic profession and your employer. There are increasing numbers of paramedics becoming involved in disciplinary cases arising from social media related issues. Remember that content published on the internet can be easily traced back to its author and the internet itself is a permanent record which is accessible to all.

Social Media Guidance

DEFINITION OF SOCIAL MEDIA

The terms "social media" and "social networking" are often used interchangeably to refer to web-based tools and technologies that support online communication and information sharing. Social media is an established publishing and broadcasting medium and includes:

- Blogs – writing a blog or commenting on other people's blogs;
- Micro-blogs such as Twitter;
- Social networking sites, such as Facebook, LinkedIn, Ning, Research Gate and personal profile pages on other social, business or research networking sites;
- Content-sharing services, such as Instagram, Flickr, YouTube, and Vimeo;
- Product or service reviews on retailer sites, or customer review sites;
- Online votes and polls;
- Public and private web forums (message boards);
- Wikis - websites developed collaboratively by a community of users, allowing any user to add and edit content;
- Podcasts;
- Social bookmarking, such as Delicious, and
- Location-based services, such as Foursquare.

Social networking sites are web-based services that allow individuals to construct a public (or semi-public) profile and display a list of other users with whom they share a social connection. In addition, these sites have created innovative communication channels, such as posting comments on individuals 'walls' and 'tagging' or 'liking' content, offering new ways for individuals to communicate with their online networks.

The use of social media has exploded in the last few years. Its popularity can be attributed to the:

- The immediacy of communication;
- The relative ease of broadcasting messages to specific audiences;
- Level of interactivity providing a rich user/learner experience;
- Ease of connecting regularly with people who share similar interests or concerns, and
- Level of personalisation that can be applied to reflect how an individual wants to receive information.

PROFESSIONAL DEVELOPMENT

The evolution of social media has enabled paramedics across the world to share knowledge and information, debate critical issues and connect with others who share similar interests. It is likely to increasingly help paramedics keep up-to-date with developments in paramedic science, practice and related professional issues, and contribute to the development of paramedics' professional identity.

Within the current fast-evolving socio-economic and policy contexts, it is important that paramedics keep abreast of relevant developments in clinical practice. Social media can facilitate this process and presents an important opportunity for continuing professional development (CPD).

However, individuals need to be aware of both the benefits and pitfalls of using social media for learning. Remember, social media is neither peer-reviewed or edited. This means that in many cases information may be misleading or inaccurate. Do not rely on the popularity of content to gauge its accuracy; a person may have thousands of 'followers', but theirs is only one perspective. It is essential to review content critically; know when you are being influenced by scientific facts and when you are being influenced by a social movement or other biases.

The College of Paramedics believes that good practice in social media is no different from that in any other form of communication. You should ensure you maintain appropriate professional and personal boundaries and take responsibility for recognising the ethical dilemmas presented by the use of different types of media.

EMPLOYMENT ISSUES

The College of Paramedics strongly recommends that employers have a social media strategy, policy and code of practice for paramedics, which is proactive, supports professional development and facilitates discussion.

Many organisations advise their staff not to say where they work on their personal social media accounts to ensure clear boundaries. However, increasingly staff are now permitted to contribute to corporate social media using their personal social media accounts. An approach adopted by many organisations is to have a corporate social media presence, such as a Facebook page or Twitter account, which selected staff are trained to manage or moderate. Some organisations also take the approach of selecting a group of staff to manage a 'personal' account with corporate branding. This second group of staff are often working at a distance from the corporate communication staff and therefore often have to translate the official messages and tone into their posts independently, increasing their risk of miss-posting.

Advisory, Conciliation and Arbitration Service (ACAS) recommends that employers have a social media policy which provides clarity on both expectations and what organisational monitoring will take place. The Trades Union Congress (TUC) recommends that employers negotiate a reasonable conduct policy which would highlight to staff what is expected of employees both at work and in their private lives (online and offline).

You should always check your employer's policy on the use of social media and ensure that you comply with this to avoid being in breach of your contract of employment. Failing to adhere to such a policy could lead to disciplinary action and could have implications for continued employment.

It is important to remember, however, that you cannot assume that your employer's social media policy is fully compliant with the expectations of other relevant bodies, such as the regulatory body, the Health and Care Professions Council (HCPC). As a registered Paramedic or Student Paramedic, it is your personal responsibility to ensure that your social media use is fully compliant with the requirements of the HCPC. In other words, a tweet which is compliant with your employer's policy but fails to reach the standard set by the HCPC may give rise to a legitimate complaint for you to answer.

Social Media Guidance

LEGAL, REGULATORY AND PROFESSIONAL PERSPECTIVES

There are legal, regulatory and professional considerations which apply to you as a health professional or student when using social media, as they do when you are using other forms of communication or sharing information. What you make public about your personal life on social media sites can have an impact on your employment and professional standing.

Remember that even if you use stringent privacy settings, you should assume that everything you say, or post can easily and quickly be made public and seen by a wide audience, including your patients, their families and friends, as well as your colleagues and (future) employers.

Legal considerations

The informality and speed at which information can be communicated via social media increase the risk of breaking the law. Several areas of the law are particularly relevant when considering the use of social media.

- Privacy, confidentiality and disclosure

The General Data Protection Regulation (GDPR) regulates the use of information about living individuals and provides the framework for ensuring the privacy, and appropriate disclosure of, 'personal' and 'sensitive (special category)' data. Social networking sites make it easy to upload and share information which may compromise patient confidentiality. So, it is important to consider whether your action(s) may breach the GDPR before you post anything online. If in doubt, do not post it.

- Defamation

If using social media, first consider what you are writing and communicating. Written content has the potential to be considered defamatory (libellous). You as the author and also possibly your employer could find yourselves open to a defamation case. Remember there is a marked distinction between sharing your views or opinions in a constructive manner, with knowingly disregarding the truth when discussing an individual online. Defamation may be a civil or criminal charge which may result if a comment is considered to have harmed the reputation of the individual.

- Equalities, diversity and harassment

Racist, sexist, homophobic comments, harassment, or bullying using social media will also breach the various laws that protect individuals from this inappropriate behaviour. Legal action may be taken against the perpetrator using the online posting as evidence.

Regulatory considerations – Health and Care Professions Council (HCPC)

The HCPC provides specific guidance about social media and stipulates that when registrants use social media, they must do so within the relevant Standards of Conduct, Performance and Ethics (which are mandatory for all registrants):

- Registrants must act in the best interests of service users;
- Registrants must respect the confidentiality of service users;
- Registrants must keep high standards of personal conduct;
- Registrants must behave with honesty and integrity and make sure that your behaviour does not damage the public's confidence in you or your profession.

The HCPC guidance on consent and ethics for students articulates similar principles.

Specifically, in relation to social media the HCPC state that registrants must "maintain appropriate professional boundaries" and must not "post information which could identify a service user unless you have their permission". It is important to remember that obtaining informed consent from patients for such matters should not take place during the clinical consultation; where the voluntariness of such consent may be undermined. Furthermore, when obtaining consent for the use of images, the context, destination and accompanying text is relevant to the patient's decision and should form part of the consent process. Written consent for sharing images of patients should be obtained prior to publication, and storage of such images must be governed by appropriate GDPR compliant organisational policy.

Professional and ethical considerations

'Professionalism' embodies a set of values and behaviours that have evolved over time and that are practised consistently. Professionalism is about acknowledging personal responsibility for professional actions and striving to deliver high-quality care. This includes recognising that actions in your personal life can impact on your professional standing. When using social media, you will want to consider your 'digital professionalism' – your professional conduct when interacting with colleagues or friends in the digital world. You should share information appropriately and be responsible for what is posted, using your professional judgment. When posting online about a topic related to the profession or work, you should consider the effect of your comments on your reputation and the reputation of your employer and profession.

Social Media Guidance

This is particularly important when translating into your professional practice what may be commonplace for the general public. For example, it has become common practice that bystanders record or photograph the events and incidents around them, on their phones, and there is no law to prevent a person taking a photograph of an accident scene from a vantage point on public land. This does not, however, infer that it is professionally acceptable for a Paramedic or Student Paramedic to do so and this is true for whatever scene or setting any professional is practising their healthcare within.

Consider your motivations for capturing such images, and carefully consider the risks and benefits of posting such images before committing them to digital memory. Ensure your intentions are honourable at all times, uphold the professional values of the paramedic profession and do not exploit patients or service users.

Maintaining confidentiality

Publishing images of 'scenes' on social media are problematic from both a professional and ethical standpoint and place patient confidentiality at risk. It is easy to inadvertently capture an identifiable landmark, or another recognisable aspect such a distinctive car design or logo.

Care should be taken, in particular where other social media contributions from the public or other agencies are likely to assist identifying patients by virtue of triangulating data. This is particularly important when managing patients particularly vulnerable to 'motivated intruders' who may seek to triangulate multiple sources of information to identify a person.

Remember that even where insufficient information is provided for a 'stranger' to identify a person, they may be able to identify themselves, and their friends and relatives may be able to identify them with very few items of information. Whilst this in many cases will fall short of a breach of data protection, it none-the-less constitutes a breach of privacy and a serious breach of the promise of confidentiality which paramedics and student paramedics owe to their patients.

Similarly, you should be aware of the functionality of social media, in particular, the functionality relating to location tagging. This is particularly important should 'live-tweeting' be considered.

Paramedics and student paramedics should remember that in many cases our patients are vulnerable, often during times of significant physical and emotional stress which may impact on decision making. Paramedics and student paramedics should not discuss real patients, their injuries, illnesses or any of their personal information in a public forum in the absence of explicit and informed consent.

Social Media Guidance

The College of Paramedics recommends that the following information should NOT be published on social media without explicit and informed consent, which may be withdrawn at any time:

- Images of the patient, setting or scene;
- Images which include any text or image records, including ECGs, x-rays and ultrasound scans which have not been fully anonymised;
- Detailed location information (stated or automatically tagged), including any destination locations;
- Exact dates and/or times of incidents or patient contacts, including when 'live-tweeting';
- Names of patients, their relatives, friends or pets, and
- Exact ages.

Maintaining professional boundaries

It is essential to maintain professional boundaries with patients and this of course includes within the context of social media. It is the responsibility of healthcare professionals to establish and maintain clear boundaries with patients. The College of Paramedics recommends the following action, now and in the future, to ensure such boundaries are maintained:

- Set any social media personal account privacy settings high to ensure you have protected yourself against inappropriate communication from patients;
- Do not respond to requests from patients via your personal account, decline any requests giving no reason;
- Do not send 'friend' requests to current or former patients;
- If using social media as part of your service (for example – a live 'chat' consultation with a patient), ensure your communication is professional and maintains appropriate boundaries;
- Report any inappropriate or obscene correspondence (to your manager or supervisor) rather than replying to it, and
- Avoid providing clinical advice when using personal social media.

Consent

The ease with which images, video clips and information can be shared across social networking sites means that it is important to be clear from the outset about how pieces of information will be stored and used. If there is an intention to create a resource that will be shared via social media, written consent must be gained from the patient and healthcare professional(s) involved, and from only those who have the capacity to make informed independent decisions.

The patient, and/or any persons involved have the right to withdraw consent at any time and for any reason.

Social Media Guidance

PROFESSIONAL USE OF SOCIAL MEDIA

<u>Do</u> use social media effectively and responsibly:

- Think about why you want to use social media, what you want to say, to whom, how and why;
- Adjust your communication style on social networking sites which are usually informal in nature;
- Avoid jargon or abbreviations to ensure your audience will understand what you are trying to say;
- Ensure your contributions are based on fact and evidence;
- Set privacy settings to ensure only known or invited individuals can access your personal social media;
- Look out for situations where traditional clinician/patient professional boundaries may be crossed, for example when an online relationship has the potential to become too social or even malign in nature;
- Get written consent from patients before using images or potentially identifying content on social media sites;
- Recognise that everything you post online contributes to building a digital record about yourself (which may not easily be deleted);
- Be transparent if contributing to social media sites in an official or professional capacity;
- Respect the 'house rules' of the social media site (terms of use etc.);
- Remember, if being photographed or being featured in a video clip, be professional in dress and manner, and
- Remember to take a proportional approach if you have to tackle negative or inappropriate comments on social networking sites. Try to solve the issue informally if appropriate. If this does not solve the matter or the original posting is serious enough to warrant moving straight to a more formal approach, refer on to the appropriate individual or organisation. For example, for an advertising issue go to the Advertising Standards Authority. For a dispute between colleagues seek advice from your manager or supervisor, or from Human Resources colleagues. If you are worried about a breach of patient confidentiality, discuss it with your management team or Caldicott Guardian.

Social Media Guidance

To avoid negative personal or professional consequences when using social media don't:

- Assume your contributions to social networking sites are private. Even if you have employed privacy settings, friends or followers can forward items outside your network and make them public;
- Post any comment or image you would not be happy to see on a national TV news channel;
- State your place of work on your personal social media account (unless you have permission to do so);
- Use social media to criticise a patient, a member of the public, colleague, manager or employer;
- Use social networking sites for whistleblowing. Follow the HCPC or employer guidance on this process instead;
- Risk breaching patient or employer confidentiality;
- Allow the speed and informal nature of social media to adversely affect professional boundaries limits;
- Accept friend requests from patients;
- Send friend requests to patients;
- Gossip about colleagues, patients, your employer etc;
- Violate intellectual property law (e.g. copyright or trademark);
- Harass anyone, or discriminate against anyone in your postings;
- Speak on behalf of people or organisations without their express permission, and
- Escalate situations by getting into a war of words online; bear in mind social networking sites are public spaces.

'Stop and Think' social media checklist

- ✓ Do you understand how the social media you are using works, including the location tagging and privacy settings?
- ✓ Does your contribution positively promote your role as a paramedic or student?
- ✓ Does your contribution reflect positively on your co-workers/colleagues?
- ✓ Does your contribution conflict with your employer's mission, culture, values and/or policies?
- ✓ Does your contribution reveal confidential patient or proprietary business information?
- ✓ Does your contribution include any information that could directly or indirectly identify a patient under your care?
- ✓ Do utilise and enjoy the many benefits that social media brings you as a modern healthcare professional.

Social Media Guidance

REFERENCES AND USEFUL LINKS

Advertising Standards Authority (ASA), http://www.asa.org.uk/

Advisory, Conciliation and Arbitration Service. http://www.acas.org.uk/index.aspx?articleid=1461

Boyd, D. and Ellison, N., Social Networking sites: Definition, History and Scholarship (2008) *Journal of Computer Mediated Communication.* pp 210-30. http://onlinelibrary.wiley.com/doi/10.1111/j.1083-6101.2007.00393.x/pdf

Claudia Megele 'Social care in the e-professionalism era' 25-4-12 https://www.theguardian.com/social-care-network/2012/apr/25/eprofessionalism-social-care

Cooper, A. and Inglehearn, A., 'Perspectives: Managing professional boundaries and staying safe in digital spaces' (2015) *Journal of Nursing.* Volume: 20 issue: 7, page(s): 625-633 https://journals.sagepub.com/doi/abs/10.1177/1744987115604066

Department of Health (2010) Relational security, see think, act. https://webarchive.nationalarchives.gov.uk/+/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_113318 Data Protection Act 1998 Chapter 29. http://www.legislation.gov.uk/ukpga/1998/29

General Data Protection Regulation (GDPR). https://eugdpr.org/

Health and Care Professions Council, Guidance on Social Media (2017) http://hpc-uk.org/publications/index.asp?id=1394#publicationSearchResults

Health and Care Professions Council. Focus on standards – social networking sites. In Focus newsletter. 2011 April; 34: 3. http://www.hpc-uk.org/publications/newsletter/index.asp?id=467

Health and Care Professions Council. Focus on standards – social networking sites. In Focus newsletter. 2011 April; 34: 3. http://www.hpc-uk.org/publications/newsletter/index.asp?id=467

Health Care Professions Council. Guidance on conduct and ethics for students. London: Health and Care Professions Council; 2016 http://www.hpc-uk.org/publications/index.asp?id=219#publicationSearchResults

Health and Care Professions Council. Standards of conduct, performance and ethics. London: Health and Care Professions Council; 2016. http://www.hpc-uk.org/aboutregistration/standards/standardsofconductperformanceandethics/

Human Rights Act 1998. https://www.legislation.gov.uk/ukpga/1998/42/schedule/1/part/I/chapter/7

Labour Research Department. Social media, monitoring and surveillance at work: a practical guide for trade unionists. London: Labour Research Department; 2012.

Mollett A, Moran D, Dunleavy P. Using Twitter in university research, teaching and impact activities. London: London School of Economics and Political Science; 2011. http://eprints.lse.ac.uk/38489/

UK Caldicott Guardian Council. https://www.ukcgc.uk/

Social Media Guidance

COLLEGE OF paramedics

leading the development of the paramedic profession

The College of Paramedics would like to acknowledge all those that have given their knowledge and time to the development of this Social Media Guidance document, and also thank the Chartered Society of Physiotherapy, and the British Association of Social Workers.

Social Media Guidance