



## Professional Communications Online and on Social Media

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Good communication skills are the foundation of a good dietetic practice. With the growing popularity of social media and online platforms, more RDs have been contacting the College about how to develop and maintain professional communications online.

The College supports RDs communicating online and using social media and web-based applications, especially to provide value-added services to clients and improve efficiency. The same principles of professionalism used by dietitians in their face-to-face communications apply online and on social media. Common sense, professional judgement and critical thinking are needed when communicating online and using social media. However, to be in compliance with the law when communicating online or using social media, there are legal obligations that RDs must know.

### 1. ANTI-SPAM LEGISLATION

Canada's anti-spam legislation came into effect July 1, 2014. It applies to emails, text, instant messages, and any similar messages sent to electronic addresses. If you use electronic channels to promote or market your services, organization or products, this law may affect you. For compliance basics, go to: [www.fightspam.gc.ca](http://www.fightspam.gc.ca)

### 2. PROTECTING PRIVACY AND CONFIDENTIALITY

RDs have an obligation to maintain the confidentiality of client information and comply with all relevant privacy legislation including the *Personal Health Information Protection Act, 2004* (PHIPA). Privacy legislation requires that, as a regulated health professional, you adopt reasonable safeguards to protect the personal health information under your control.

### Obtain informed consent for online communications

When communicating directly with clients online, it is important to inform clients of the security issues surrounding communicating personal health information online. Informed consent must be obtained. In many cases, consent may be implied when clients choose to communicate online. Use your professional judgment as to when you can rely on implied consent versus a more formal written or verbal consent to communicate with clients online.

### Encrypt mobile devices having personal health information

Online and social media communication include the use of laptops, USB keys, tablets, smart phones and other mobile devices. Ontario's Information and Privacy Commissioner requires that health care professionals encrypt all mobile devices that contain personal health information. As these devices are prone to theft, password protection is not enough, encryption is also required.

The College doesn't have any specific recommendations regarding encryption devices, however, there are many options including USB keys that come pre-loaded with encryption software. For more information, consult an information technology expert or conduct an online search for encryption devices available. The Office of the Privacy Commissioner, Ontario, has published a fact sheet on this topic. The Office of the Privacy Commissioner, Ontario, has published a fact sheet on this topic at: <http://www.ipc.on.ca/images/Resources/fact-16-e.pdf>.

If you work in an organization, consult your information technology personnel to determine the best approach to secure the privacy of client information. Many employers also have rules and policies for employee use of online communications and social media.

### 3. MAINTAINING ONLINE PROFESSIONALISM

#### Professional Conduct

As RDs, your professional conduct and obligations online are the same as your behaviour in other settings such as hospitals, public health, long-term care, clinics or private practice. Be just as professional online as you are face-to-face with clients.



In keeping with the College's [Professional Misconduct Regulation](#), when practicing dietetics online, use the same name that appears in your profile on the College [Register of Dietitians](#). You must also use your professional designation to identify yourself, either "Registered Dietitian" or "RD".

#### Dual Relationships

Avoid dual relationships with clients, i.e. personal and professional. Social networking sites are more casual and informal than meeting clients face-to-face in an office. This makes building or maintaining a professional relationship online more challenging. Whenever possible, separate your professional online presence from your personal one. Never have interactions with your clients on your personal social networking or social media sites.

Accepting a client's "friend" invitation on Facebook, even with strict privacy settings, may involve you in the client's private life and will expose some information about your own private life. Also, accepting the invitation characterizes your relationship as social as well as professional. If a client invites you to be their "friend", the best approach is to decline the request and to discuss personally with the client on the phone or at the next visit (if it is soon) why you cannot accept the request.

#### Professionalism

To maintain professionalism, be cautious about what you or others post on your professional and personal social networks. Always maintain a respectful and professional image, even on your personal social media. Your personal status updates and photos, even if marked private, can be shared and distributed to a wider public by someone in your network. What you do in your personal life can impact your professional life, too.

#### Never Identify Clients Online

While RDs may discuss their practice experiences using social media and social networking, they should never refer to clients by name or provide any information that could be used to identify clients. It is your responsibility as a health professional to take all necessary steps to create a secure practice environment and to prevent unauthorized access to client information online or on your personal mobile devices.

#### Respect for Others

It is important to maintain respect for clients and colleagues online at all times. Everything you post – personally or professionally – can be linked back to your practice and your colleagues. Defamation, copyright and plagiarism laws also apply to social media and social sharing. Always provide credit and links back to original sources when sharing information.

#### Integrity

Maintain high standards of integrity when communicating online. For example, avoid airing workplace issues on social media. Use proper communication and conflict resolution approaches to discuss, report and resolve workplace issues in your workplace, not online.

If you share your nutrition expertise online, the best way to maintain the connection between online participants and safe, competent dietetic practice is through trustworthy and clear communications. This means that any information you provide online is accurate, current and, most of all, easy for clients to understand. Your opinions must be supported by evidence and best practice; and must never be misleading or deceptive.

Communicating online and using social media makes

information easy to publish. As RDs, it is important to reflect on your practice and aim for clear, professional and audience-appropriate communications.

#### 4. APPLICATION OF PROFESSIONAL PRINCIPLES

##### Communicating with clients online

- When texting or emailing personal health information to clients, obtain informed consent from your client. Discuss the risks.
- Avoid using portable equipment in public places where people around you may view confidential information.
- Always password-protect your electronic devices and encrypt personal health information stored on your mobile equipment.
- Adopt practices for protecting the privacy of health information being transmitted online, such as, using initials to identify a client rather than a full name, password protection, assigning a numeric code or using encryption.

##### Interprofessional Communication – Text Orders

While the College does not have a policy regarding text orders from allied health staff, the performance expectations and regulatory obligations remain the same as when accepting orders via other means such as telephone or verbal orders. With the increased use of electronic communications by organizations and other individual employees, it means RDs must use new measures to protect the privacy of clients to meet their professional obligations. If your organization allows texting of orders, then follow the employer policies.

##### How to Document When Using Apps

Whenever RDs use a secure online client portal to practice or an app to exchange information with clients, the online interactions must be documented. If clients send personal health information using an app on a smartphone, RDs should transfer or summarize the information into the health record.

##### Social Networking

Social Networking is using an online service, platform, or site that focuses on building social relations among people who share similar interests and activities. Social networking websites may be useful places for RDs to gather and share

Always adhere to the same principles of professionalism online as you would offline.

their experiences, as well as to discuss nutrition and dietetics. These types of professional interactions represent an ancillary and convenient means for professional and interprofessional education and dialogue. However, most social networking sites do not provide a secure platform for confidential patient information.

- Using Twitter: If someone asks for dietetic advice through Twitter, it is important to note that information on Twitter is not confidential. Although general information about nutrition may be shared with a client on Twitter, for more personal advice, it would be best to take the conversation offline, unless you have explicit informed consent from the client. Also keep in mind that Twitter's character limitation can make meaningful communication more difficult. If you work for an organization, refer to your employer's social media or social networking policy for direction.
- Using Facebook: Before you post information on Facebook or "like", anything, reflect on your intentions and the possible impact on your professional image. Ask yourself: Does this post uphold my image as a professional health care provider? Does it respect my friends and colleagues who will see this post? Is it accurate? "Liking" someone's disrespectful comments, inappropriate jokes or pictures is just about the same as posting them yourself.

##### Web-Based Counselling

Always obtain an informed consent when providing web-based services and interacting with clients online. Web-based counselling sessions through video transmission can be done either through a secure online server, such as the Ontario Telemedicine Network (OTN) or through standard Internet connections. If you are using a standard Internet connection, remember that the information being relayed may not be as secure. Make sure your clients are aware of this when obtaining their consent.

## E-mail

As a general rule, sending personal health information through regular email should be avoided. Acceptable options include obtaining the person's consent to use email, encrypt the email or make the information anonymous. This would involve informing clients of the security issues (e.g., the Internet is not 100% secure and email is subject to hacking). RDs should also consider that email can be unreliable, arriving hours or even days later, or not at all.

## Blogging

Assuming there is no conflict of interest, an RD can blog about topics and products that relate to nutrition. When blogging about nutrition, ensure that your opinions are evidence-based and written in a professional manner. If you are using client examples, remove any client-identifying information from the post. Clients should not be able to identify themselves as the subject of the blog post. Before you blog, reflect on your intentions and the possible consequences of your writing. Also, be careful with your responses to blogs. "Liking" or agreeing with someone's disrespectful comments on a blog is almost the same as making them yourself. "Liking" means you are in agreement and support the comments.



Before you post information or pictures on social media or "like", anything, reflect on your intentions and the possible impact on your professional image.

"Liking" someone's disrespectful comments, inappropriate jokes or pictures is just about the same as posting them yourself.

## USER AGREEMENT

We recommend that RDs develop a user agreement for all of their Internet sites (Facebook pages, websites, blogs, etc.). The user agreement should clearly indicate the purpose of the site and user responsibility for posts, respecting others, and that comments will be moderated and may be deleted by moderator if inappropriate. It should also indicate the limitations of the information shared on the site, for example, by using a disclaimer such as "information is general and is not intended to replace advice obtained from your physician, dietitian or other health professional".

Some websites have implemented a declaration box that needs to be checked before being allowed to join the group, and/or view or comment on a site. This could be something that RDs implement on the sites they are personally managing to ensure all readers are aware of the expectations for appropriate conduct.

## REFERENCES

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