



Introduction

With the rise of social media, dietitians are likely to engage or be approached to endorse products on social media for financial and personal gain. While there is a lot of potential for benefit using social media platforms, dietitians must be aware of the requirements of:

- Legislation, including but not limited to, the definition of dietetics in the Dietitians Regulation, which sets the limits of scope of practice, CDBC Marketing Bylaws (section 77), Code of Ethics, and Standards of Practice,
- Clear disclosure principles, such as those set out by Ad Standards Canada,
- Identifying and managing conflicts of interest and professional boundaries,
- Limitations on endorsements of products and colleagues, and
- Evidence-informed services.

This is not only important for the safety and trust of the public, but also for maintaining dietitians' integrity and credibility.

The BC *Health Professions Act* and the CDBC bylaws give the CDBC the ability to set out expectations for dietitians using their RD title for professional (civil and respectful) communication, privacy, and marketing, in the interest of protecting the public. From a personal online presence perspective, the Supreme Court of Canada has ruled that professional regulators, such as the CDBC, have the authority to investigate and discipline registrants for off-duty conduct where a sufficiently negative impact on the profession and the public's interest can be demonstrated. Dietitians are responsible for balancing their right to freedom of expression and private life, with their responsibilities as a CDBC registrant.

Purpose:

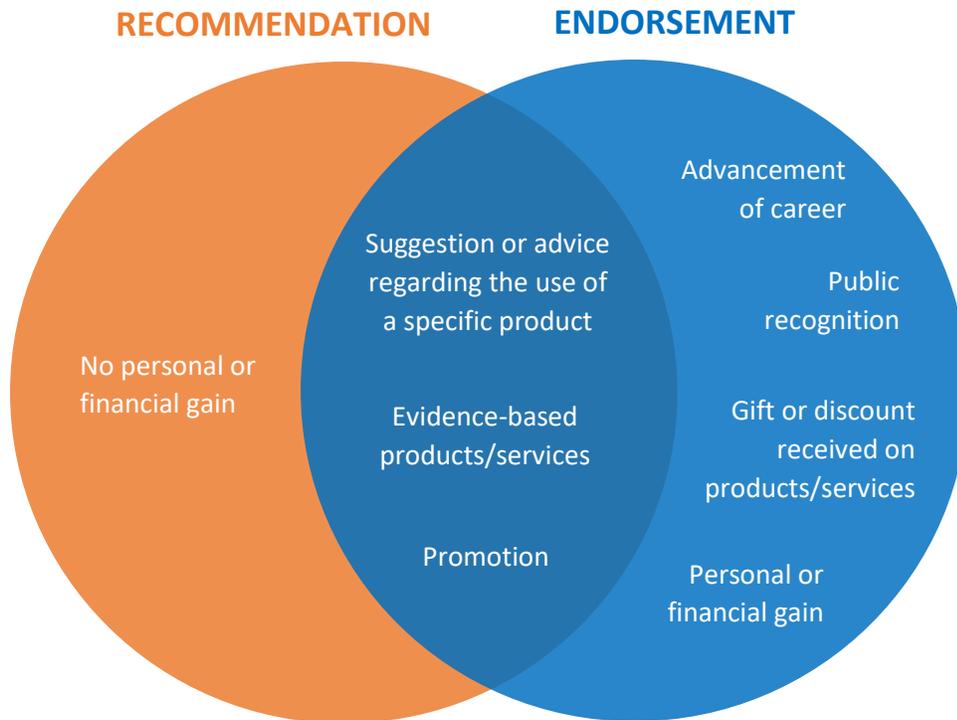
- To guide dietetic practice and support public protection by outlining the CDBC's expectations regarding social media use.
- To provide critical thinking points to support dietitians in upholding professional expectations when posting on social media.

NOTE: These guidelines should not be interpreted on their own and are to be considered with other relevant information: CDBC Bylaws, section 77: Marketing, Code of Ethics, Standards of Practice; CDBC Patient Relations Program: *Where's the Line?*; CDBC Marketing Standards; CDBC Policy QA-09 Conflict of Interest and Sales, the Testimonial Position Statement; and other legislation and standards relevant to social media activity such as Ad Standards Canada.

Definitions:

Social Media can be defined as forms of electronic communication (such as websites for social networking or microblogging) through which users create online communities to share information, ideas, personal messages, and other content (such as videos). **It is important to recognize that Social Media use is a form of marketing, and Marketing bylaws and standards must be upheld.**

What is the difference between Endorsement and Recommendation?



Social Media Pros and Cons

Social media has both personal and professional uses. It is important to maintain professional boundaries in the virtual world and separate personal from professional social media accounts.

Professional use of social media can:

- Help the public better understand what dietitians do.
- Raise the profile of dietitians and dietetic practice.
- Help dietitians connect with other professionals nationally and internationally.
- Allow dietitians to develop and share skills and knowledge, especially through evidence-based resource and experience sharing.
- Improve access to credible, reliable and accurate nutritional information to support health and wellness of different communities and clients.

While there are some clear reasons to be active on social media, there are also drawbacks*:

| Pros | Cons |
|--|--|
| <p>Engage: Maintain and provide current professional knowledge and join debates about current issues facing the profession and the public.</p> | <p>Privacy: The ease of information sharing can result in privacy loss. Breaching client privacy can lead to disciplinary or legal action.</p> |
| <p>Communicate: Share information with clients, potential clients, and the general public.</p> <p>Network with dietitians locally, nationally and internationally.</p> | <p>Time: It can be time consuming to maintain an active social media presence.</p> <p>Setting aside time to manage a professional social media presence can be demanding as you may have post often to gain visibility and presence.</p> |
| <p>Promote: Target communication efforts to potential and existing clients, engage with stakeholders to gather feedback and gain input on service development and other issues, and quickly reach more people.</p> <p>Increase visibility of regulated professions to support ethical, competent and safe nutrition services.</p> | <p>Professional risk: Social media presents unique risks related to client-dietitian boundary crossings and difficulty maintaining appropriate professional relationships.</p> <p>Social media also presents a risk related to jurisdictional boundary (where the dietitian is registered and where the client is located may differ)</p> <p>There are reputational risks as the speed and reach of social media means that posts and negative reviews can spread quickly.</p> <p>Social media posts that are considered personal can still be called into question, if they aren't in line with professional expectations.</p> |

*Adapted with thanks from the Physiotherapy Alberta College and Association.

Guidelines

1. Be aware of boundary issues and the potential blurring of the therapeutic relationship.

- a. Keep professional and personal social media accounts separate. Use professional language on personal pages since they are accessible to members of the public.
- b. Maintain professional boundaries between the dietitian and the client:
 - Avoid creating online connections with clients (or those closely associated with clients) using personal accounts and if such a connection occurs, consider communication related to the provision of nutrition services by way of professional channels.
- c. Refrain from providing client-specific advice online in an internet discussion to a client or potential client. It may be appropriate for dietitians to provide health-related information online that is not client-specific for the purpose of public or professional education.

- d. If nutrition care is indicated and initiated by the client, a dietitian should consider taking the conversation offline. The pursuant therapeutic relationship should be considered equivalent to providing in-person client education and treatment, and thereby subject to the same Standards of Practice, including the Standards for Record Keeping, and Virtual Dietetic Care Policy as other client care activities.

2. Guard against compromising client care that could arise from pursuing personal advantage, whether financial or otherwise, at the expense of the client.

- a. Be mindful that, using your personal or professional account to comment, follow, “thumbs-up” or “react to” another professional or colleague’s work may be perceived as endorsement of that individual’s business or services in the public’s eye:
 - Consider the CDBC Marketing Standards and policy Qac-09 Conflict of Interest and Sales before commenting on or “liking” another professional’s work.
 - When using your dietitian social media accounts, refrain from commenting or “liking” products or services that are not within the dietetic scope of practice or constitute conflicts of interest.
 - When advertising, provide more than one option for the sale of dietetics products to prevent conflicts of interest and be ready to disclose any financial gain made from the sale.
 - A referral to another healthcare professional is not deemed to be an endorsement, as long as it meets the requirements set out in Policy Qac-09 Conflict of Interest and Sales.
- b. Be mindful of the CDBC Bylaws’ section 77 for Marketing, CDBC Code of Ethics and CDBC Standards of Practice before deciding to promote and endorse dietetic products, services, and colleagues, as these require options for purchase, full disclosure and transparency in the public’s best interest.
- c. Consider that connections between brands and influencers may change the public’s perception of the promoted content; disclosing such connections is mandatory. To ensure clear disclosure, Ad Standards Canada recommends the following:
 - Disclosures should be upfront, conspicuous and unambiguous. For example, include the disclosure at the beginning of a video, and in the first few lines of a post.
 - Blanket disclosures such as “many of the products...were provided to me for free by their manufacturers” in a profile or bio section are strongly discouraged.
 - Be specific about the brand, product, what was given for promotion, and the nature of the material connection.
 - Use widely accepted hashtags such as #ad and #sponsored. Try not to not use hashtags such as #ambassador and #partner that don’t clarify if monetary connections are present. Simply tagging the brand is insufficient.
 - Disclosure should be in the same language as the endorsement.

3. Be responsible and respectful in all communications.

- a. Maintain responsible and respectful relationships with other members of the health care team including physicians, hospital staff, volunteers, students, and all other individuals who contribute to health care delivery.

- b. Be mindful of social media presence and be proactive in removing content which may be viewed as unprofessional. Examples of unprofessional content include, but are not limited to, posting photos, reels, stories and comments with the following content:
 - Alcohol and drug impairment,
 - Profane, sexually explicit, or racially derogatory comments that could imply [discrimination](#),
 - Threatening and harassing comments,
 - Opinions and comments about clients, colleagues, employers, the CDBC, and the dietetics profession, both of professional and personal social media pages, that would be considered damaging to their reputations.
- c. Ensure all information shared on social media is accurate, evidence and data-informed and current. When feasible and practical, it should be clearly stated that the information posted is not intended to replace individualized dietetic advice.
- d. Be aware of laws related to [defamation](#), [copyright](#) and plagiarism and take action to prevent any violations.
- e. Time must be devoted to keeping information posted on social media clear, up to date and evidence informed, such that information is valid as of date of publication; include the date that a web blog is published.

4. Consider conduct, context, and content when posting to social media.

- a. Proactively consider how other professional expectations apply to the use of social media.
- b. Assume all content on the internet is public, permanent, and accessible to all.
- c. Use of emojis and texting in shorthand can clarify meaning and tone, but also lends informality. Balance clarity with professionalism. Consider that reacting with an emoji to any post or comment on a post can be easily misconstrued, causing complications and confusion.
- d. Apply the strictest privacy settings to protect the dietitian's information and information about the dietitian that could be posted by others.
- e. Refrain from posting identifying information about a client in any context online, including in a professional blog, video-sharing medium, or discussion forum. Minimize or hide personal identifiers.
- f. When providing services and interacting with clients using social media, informed consent must be obtained. In many cases, consent may be implied when clients choose to engage in communication via social media.
 - It is important to promote informed consent that includes discussing potential security issues surrounding communicating personal health information through any medium on the Internet. Use professional judgment as to when implied consent can be relied on.
 - Consider taking your conversation with your client offline whenever possible.
 - Interacting with clients online in a manner that acknowledges or implies that they are a client, without direct informed consent, is a breach of confidentiality.
- g. Refrain from using professional titles and initials or making references to being a member of the profession when representing personal views.
- h. Recognize the [duty to report](#) to the CDBC and other health regulatory organizations, any online unprofessional conduct and conduct that may cause harm to the public. Examples may include

but are not limited to: discriminatory language, sharing personal client information, and blurring of the dietitian-client therapeutic relationship.

- i. While dietitians are not responsible for third party websites and unsolicited comments, they should be reasonably aware of comments posted about their practice. Where information is inaccurate, misleading, fraudulent, or defamatory, where possible, dietitians should contact the third party's website administrator to request a correction or deletion. If this is not possible, to reply to the comment with accurate information, or initiate a resolution process in the case of a complaint.
- j. Unsolicited reviews on public forums (ex. Yelp or Google Reviews) are permitted. This includes posts and website content developed by members of the public that link to a dietitian's social media platform.
- k. A dietitian may share or link to a positive response on another dietitian's presentation/workshop, or for a product or service that defines their private practice (such as a webinar or book for sale), but they may not share or link to an individual client's experience that could be viewed as a testimonial. Refer to the CDBC Testimonial Position Statement.

5. Consider developing a Code of Conduct or Social Media Policy for online private practice* .

- a. If developing a Code of Conduct for Social Media Use, dietitians can use this Social Media Use Guideline document as its basis. A Code of Conduct can include points related to:
 - Recognition of ethical and legal requirements to maintain privacy, including limitations on sharing personal health information across public platforms in the therapeutic relationship, as well as in the professional on-line social media space.
 - Consent, both for social media platform use and for nutrition care.
 - Upholding professional boundaries and a professional presence in all interactions at work, at home, in public and online.
 - Assumption that social media use is publicly viewed and permanent.
 - Develop a strategy to use if you are contacted via your personal social media by a client. Consider how best to decline while preserving the professional relationship.
 - Develop a strategy to use if you are contacted inappropriately (repeatedly or offensively) by a client or potential client.
 - Duty to report inappropriate content or content by a client that exhibits potential risk of harm to self (suicidal ideations) or others (violence). Refer to section 7 of the [Virtual Dietetic Practice Guidelines](#) for details.
 - Pause before posting.
- b. If developing a Social Media Policy specific to a private practice, consider including:
 - Purpose of social media use.
 - Approved social media platforms.
 - Content expectations and guidelines.
 - Who can post? Who can comment on behalf of the business?
 - Any business information that must be kept confidential and the rationale.
 - Rules relating to personal profiles or using personal profiles to promote the business.

- Consequences if employees do not comply with the Social Media Use policy.
- An employee signature indicating they are aware of the social media policy and any implications of failing to comply.
- Rules around giving nutrition advice online.
- How to deal with online public relations issues that arise.
- How negative comments will be responded to.

*Adapted with thanks from the Physiotherapy Alberta College and Association.

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