

Commentary on revised guidance on social media for consultation

The extent of the changes we are proposing to the structure and content of the existing guidance on social media may make tracked changes difficult to understand. We produced this document to provide more information and outline the differences between the draft guidance for consultation and the existing guidance. We provide commentary on the changes made, highlighting the reasons why these changes have been made.

Existing guidance	Draft guidance	Commentary
<p>About this document</p> <p>We have written this document to provide guidance to registrants who use social media. It explains how to use social media in a way which meets our standards.</p> <p>This document cannot deal with every issue that might come up. Instead, we have focused on the issues that registrants and others told us they came across most frequently.</p> <p>This guidance is focused on our standards. Some professional bodies publish social media guidelines to support their members to get the most from this technology. If you are employed, your employer may also have relevant policies or guidance that apply to you.</p>	<p>About this document</p> <p>We have written this document to provide guidance to registrants who use social media. Registrants must meet our Standards when using social media. We explain more about how they can do this, when using professional and personal accounts, in this guidance. When using their personal accounts, registrants should be mindful of the impact their posts may have on their professional practice and their profession.</p> <p>Social media is an important way for registrants to express their opinions, beliefs and share information. Our Standards and this guidance respect and uphold registrant's right to freedom of expression. This right, which is set out in Article 10 of the European Convention of Human Rights, is not an absolute right, and can be restricted in certain circumstances. You can find out more information about freedom of expression at</p>	<p>We have updated this section to explicitly state the circumstances in which the guidance and our Standards apply. This includes both professional and personal use of social media.</p> <p>The HCPC respects a registrant's right to freedom of expression and therefore will only review posts that impact a registrant's professional practice or their profession more generally.</p> <p>We have also made changes to make it clear that registrants are expected to use this guidance to build their understanding and thereby use their professional judgement when deciding what to post.</p>

	<p>the Equality and Human Rights Commission (EHRC) website.</p> <p>This document cannot deal with every issue that might come up. The examples and information provided will enable registrants and all HCPC stakeholders to build their understanding and use their professional judgement to identify the appropriate behaviour when registered professionals use social media.</p> <p>This guidance is focused on our standards. Some professional bodies publish social media guidelines to support their members to get the most from this technology. If you are employed, your employer may also have relevant policies or guidance that apply to you.</p>	
<p>How this document is structured</p> <p>This document is divided into three sections.</p> <ul style="list-style-type: none"> • Section 1 contains some top tips for using social media. • Section 2 provides guidance on how our standards relate to using social media and some relevant issues you may come across. 	<p>How this document is structured</p> <p>This document is divided into three sections.</p> <ul style="list-style-type: none"> • Section 1 provides guidance on how our standards relate to using social media and some relevant issues you may come across. • Section 2 contains some top tips for using social media. 	<p>We have changed the structure of this document by bringing the guidance section forward. This makes the primary purpose of this document clear – to provide guidance to registrants on social media. The top tips section is also better understood after the guidance section.</p>

<ul style="list-style-type: none"> Section 3 contains information about how to find out more. 	<ul style="list-style-type: none"> Section 3 contains information about how to find out more. 	
<p>Language</p> <p>Throughout this document:</p> <ul style="list-style-type: none"> 'we' and 'us' refers to the Health and Care Professions Council (HCPC); 'registrant' refers to a professional on our register; 'you' or 'your' refers to a registrant; 'service user' refers to anyone who uses or is affected by the services of registrants, for example, patients or clients; and 'social media' refers to websites and applications that allow you to create and share content and to interact with other users. This includes, but is not limited to, websites such as Facebook, Twitter and YouTube, as well as online forums and blogs. 	<p>Language</p> <p>Throughout this document:</p> <ul style="list-style-type: none"> 'we' and 'us' refers to the Health and Care Professions Council (HCPC); 'registrant' refers to a professional on our register; 'you' or 'your' refers to a registrant; 'service user' refers to anyone who uses or is affected by the services of registrants, for example, patients or clients; and 'social media' refers to media sharing websites and applications and networking websites and applications that allow you to create and share content and to interact with other users. This includes, but is not limited to, websites such as Facebook, Twitter and YouTube, media sharing applications such as Instagram and TikTok and networking applications such as WhatsApp, as well as online forums and blogs. 	<p>We have updated our definition of social media to better reflected current usage of media sharing websites and applications and social networks.</p> <p>We heard from stakeholders that they were concerned about the use of modern applications to share information. We have therefore added reference to common applications used e.g., WhatsApp. This makes it clear when our standards and guidance apply.</p>

<p>About us</p> <p>We are the Health and Care Professions Council. We are a regulator and were set up to protect the public. To do this, we keep a register of professionals who meet our standards for their professional skills, knowledge and behaviour. Individuals on our Register are called 'registrants'. We currently regulate 15 professions.</p>	<p>About us</p> <p>We are the Health and Care Professions Council. Our statutory role is to protect the public by regulating healthcare professionals in the UK. To do this, we keep a register of professionals who meet our standards for their professional skills, knowledge and behaviour. Individuals on our Register are called 'registrants'. We currently regulate 15 professions; you can find out which professions we regulate here.</p> <p>We promote high quality professional practice, regulating over 300,000 registrants by:</p> <ul style="list-style-type: none"> • setting standards for professionals' education and training and practice; • approving education programmes which professionals must complete to register with us; • keeping a register of professionals, known as 'registrants', who meet our standards; • acting if professionals on our Register do not meet our standards; • and stopping unregistered practitioners from using protected professional titles 	<p>We have updated the language here to better reflect HCPC's role in regulating the professions.</p> <p>We have also added a link to the page on our website that lists the professions we regulate. This makes the document easier to read.</p> <p>We have added further information about our role as a regulator to support readers understanding of the activities of the HCPC.</p>

<p>About the standards</p> <p>We set standards of conduct, performance and ethics, which set out how we expect registrants to behave. We use the standards when a concern has been raised about a registrant, to help us decide whether we need to take action to protect the public.</p> <p>As a registrant, you must make sure you are familiar with the standards and that you continue to meet them at all times.</p> <p>At the Health and Care Professions Council Professions we regulate:</p> <ul style="list-style-type: none"> – Arts therapists – Biomedical scientists – Chiropodists / podiatrists – Clinical scientists – Dietitians – Hearing aid dispensers – Occupational therapists – Operating department practitioners – Orthoptists – Paramedics – Physiotherapists – Practitioner psychologists – Prosthetists / orthotists – Radiographers – Speech and language therapists 	<p>About the standards</p> <p>We set standards of conduct, performance and ethics, which set out how we expect registrants to behave. We use the standards as follows:</p> <ul style="list-style-type: none"> • to help us to make decisions about the character of professionals who apply to our Register. • if someone raises a concern about a registrant’s practice. • when things go wrong, they help us to decide whether it is necessary to act. <p>As a registrant, you must make sure you are familiar with the standards and that you continue to always meet them.</p> <p>The current Standards of conduct performance and ethics can be found at the HCPC website: Standards of conduct, performance and ethics (hcpc-uk.org).</p>	<p>We have simplified this section to only refer to the standards and their purpose. We have also added a link to the standards to help readers find further information more easily.</p>
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<p>Section 1: Using social media</p> <p>Benefits of social media</p> <p>Registrants have told us that using social media lets them:</p> <ul style="list-style-type: none"> • develop and share their skills and knowledge; • help the public understand what they do. • network with other professionals nationally and internationally; and • raise the profile of their profession. <p>Most registrants who use social media already do so responsibly, in line with our standards, and without any difficulties at all. However, we know that registrants sometimes have questions or concerns about using social media because they want to make sure that they always meet our standards.</p> <p>This guidance explains what our standards mean when using social media. We have set out the guidance below under the areas of our standards which apply to the appropriate use of social media.</p>	<p>Section 1: Using social media</p> <p>Benefits of social media</p> <p>Registrants have told us that when using social media in a professional capacity, they are able to:</p> <ul style="list-style-type: none"> • develop and share their skills and knowledge; • help the public understand what they do. • network with other professionals nationally and internationally; and • raise the profile of their profession. <p>In a personal capacity, we have heard from registrants that social media is a helpful way to:</p> <ul style="list-style-type: none"> • connect with friends and family • share their personal views and opinions to other individuals • gain better understanding of the world around them <p>Most registrants who use social media already do so responsibly, in line with our standards, and without any difficulties at all. However, we know that registrants sometimes have questions or concerns about using social media because they want to</p>	<p>We have added information about the various circumstances that registrants find social media use helpful including personal use. This better reflects the various circumstances that our standards and guidance apply.</p> <p>It also makes clear the important role that social media plays in providing registrants a space to express their personal views, opinions and beliefs.</p>

	make sure that they always meet our standards.	
	<p>The standards and social media</p> <p>This guidance explains how to meet our Standards when using social media in a professional and/or personal capacity. We have set out the guidance below under the areas of our standards which apply to the appropriate use of social media.</p> <p>You should note that historic social media activity may be considered against our standards, even if you were not a registered professional at the time of that social media activity. It is important that you consider whether any historic social media activity may call into question your compliance with the standards considering the guidance below. If it might do, you should take action (for instance, by removing historic social media posts or deleting accounts).</p>	<p>We have added this as a separate section to clearly mark the section of guidance. This makes the document easier to follow.</p> <p>We have also made it clear that the guidance applies in both professional and personal use of social media, within the limits set out in Article 10 of ECHR to achieve certain objectives (which include the protection of health or morals, the protection of the reputation or rights of others, and preventing the disclosure of information received in confidence).</p>
Maintain appropriate boundaries	<p><u>Challenge discrimination</u></p> <p>Our standards of conduct, performance and ethics say:</p>	<p>This section has been updated in line with the proposed revised standards – Standard 1.6 and the four new Standards (1.8, 1.9, 1.10 and 1.11) to include more active</p>

<p>Our standards of conduct, performance and ethics say:</p> <p><i>'You must keep your relationships with service users and carers professional.'</i> (1.7)</p> <p>Some professionals find using social media a valuable way of communicating with service users and the public. However, social media can blur the boundaries between the personal and the professional. It is just as important to maintain appropriate boundaries when using social media as it would be if you were communicating by any other method. You must always communicate with service users in a professional way. You might decide to set up a separate professional account where you provide general information for service users and the public. If you are employed and plan to use this account to have direct contact with service users, you should first agree with your employer whether this is appropriate.</p> <p>Keep in mind that service users may still be able to find and contact you through your personal account. If this happens, we recommend that you refuse friend requests. If appropriate, say that you cannot mix social and professional relationships. If you want to follow up any contact you receive, consider using a more secure communication channel, such as your professional email account. If you include content relating to your professional role on a personal account or</p>	<p><i>1.6 You must take action to ensure that your personal values, biases and beliefs do not lead you to discriminate against service users, carers or colleagues. Your personal values, biases and beliefs must not detrimentally impact the care, treatment or other services that you provide.</i></p> <p>Your services must be available to all service users and/or their carers. When you share content on social media you must do so in a way that does not hinder people's access to your services. This means that you should be aware of the impact that your personal views, biases and beliefs may have on people's access to your services.</p> <p>This applies whether you are using a personal or professional social media account.</p> <p><u>Maintain appropriate boundaries</u></p> <p>Our standards of conduct, performance and ethics say:</p> <p><i>1.9 You must take action to set and maintain appropriate professional boundaries with service users and/or carers and colleagues.</i></p> <p><i>1.10 You must use appropriate methods of communication to provide care and other services related to your practice</i></p>	<p>language regarding maintaining professional boundaries.</p> <p>It has been rewritten to reflect the circumstances in which HCPC can take an interest in a registrant's social media posts.</p> <p>We have changed the guidance relating to Standard 1.8 to make it clear that registrants should think about the impact of their posts before they share them. It better reflects the limits of HCPC interest in social media posts on a personal account and protects people's access to services.</p>
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<p>vice versa, think about whether you would be happy for these different audiences to see the material you post. Think carefully about what you share and who can see it.</p>	<p><i>1.11 You must ensure that existing personal relationships do not impact professional decisions.</i></p> <p><i>1.12 You must not abuse your position as a health and care practitioner to pursue personal, sexual, emotional or financial relationships with service users and/or carers or colleagues.</i></p> <p>Social media can blur the boundaries between your personal and professional life. It is just as important to maintain appropriate professional boundaries when using social media as it would be if you were communicating by any other method. You must always communicate with service users in a professional way. You might decide to set up a separate professional account where you provide general information for service users and the public. If you are employed and plan to use this account to have direct contact with service users, you should first agree with your employer whether this is appropriate.</p> <p>Keep in mind that service users may still be able to find and contact you through your personal account. If this happens, we recommend that you refuse friend requests. If appropriate, say that you cannot mix social and professional relationships. If you want to follow up any contact you receive, consider</p>	
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	<p>using a professional communication channel, such as your professional email account.</p> <p>If you include content relating to your professional role on a personal account or vice versa, think about the impact of the content that you will share on these different audiences when they see the material you post. Think carefully about what you share and who can see it.</p> <p>Bear in mind the personal material you might intend to share only with friends or family on a personal account could be accessible to a much wider audience, and once uploaded, it may not be possible to delete it or control how widely it is shared.</p>	
<p>Communicate appropriately</p> <p>The standards of conduct, performance and ethics say:</p> <p><i>'You must use all forms of communication appropriately and responsibly, including social media and networking websites' (2.7)</i></p> <p>When using social media, you should apply the same standards as you would when communicating in other ways. Be polite and respectful and avoid using language that</p>	<p><u>Communicate appropriately</u></p> <p>The standards of conduct, performance and ethics say:</p> <p><i>2.10 You must use media sharing networks and social networking sites responsibly.</i></p> <p>When using social media, you should apply the same standards as you would when communicating in other ways. You must always be polite and respectful to others when communicating in a professional capacity</p>	<p>We have updated this section in line with the proposed revised standards – Standard 2.10 and 2.11.</p> <p>Changes to the guidance on Standard 2.10 specifically tackles misinformation, a common theme and concern throughout our stakeholder workshops.</p> <p>We have removed reference to registrant's avoiding "using language that others might reasonably consider to be inappropriate or offensive". This ensures that a registrant's right to freedom of expression is not</p>

<p>others might reasonably consider to be inappropriate or offensive.</p> <p>Use your professional judgement in deciding whether to post or share something. Remember that comments or posts may be taken out of context or made visible to a wider audience than originally intended.</p>	<p><i>2.11 You must make reasonable checks to ensure information is accurate, true, does not mislead the public and is in line with your duty to promote public health when sharing information on media sharing networks and social networking sites.</i></p> <p>When using social media, think about the accuracy and truth of the content that you share or circulate. Check that the information originates from people and/or organisations that are trustworthy and does not contradict government public health messages.</p> <p><i>2.12 You must use media sharing networks and social networking sites appropriately and responsibly, maintaining professional boundaries at all times and protecting service user/carer privacy.</i></p> <p>You must also be careful that the information you share on social media does not reveal personal information about service users and/or their carers.</p> <p>Use your professional judgement in deciding whether to post or share something. Remember that comments or posts may be taken out of context or made visible to a wider audience than originally intended.</p>	<p>unreasonably hindered by other social media users.</p>

<p>Respect confidentiality</p> <p>Our standards of conduct, performance and ethics say:</p> <p>'You must treat information about service users as confidential' (5.1)</p> <p>When you post information about another person on social media, think about whether it is appropriate to share that information. If the information could allow a service user to be identified, you must not put it on a site without their permission. This information could include details about their personal life, health or circumstances, or images relating to their care.</p> <p>Even if you have the highest level of privacy settings, something you share online can quickly be copied and redistributed to a much wider audience. This means a post can stay in the public domain after you delete it. Try to stay up to date with any changes to the privacy settings of the social media you use. If you are unsure whether to post something, stop and get advice first from an experienced colleague, professional body or trade union.</p>	<p><u>Respect confidentiality</u></p> <p>Our standards of conduct, performance and ethics say:</p> <p><i>5.1 You must treat information about service users as confidential.</i></p> <p>When you post information about another person on social media, think about whether it is appropriate to share that information. If the information could allow a service user to be identified, you must not put it on a site without their permission. This information could include details about their personal life, health or circumstances, or images relating to their care. This applies whether you are sharing information to your personal connections or to the public.</p>	<p>We have updated this section to clearly state that registrants must think about confidentiality when using either a personal or professional account.</p>
<p>Be honest and trustworthy</p>	<p><u>Be honest and trustworthy</u></p>	<p>We have updated this section to enable registrant's to better understand the</p>

<p>Our standards of conduct, performance and ethics say:</p> <p><i>'You must make sure that your conduct justifies the public's trust and confidence in you and your profession' (9.1)</i></p> <p>This means you need to think about who can see what you share. Make sure you understand the privacy settings of each social media channel that you use. Even on a completely personal account, your employer, colleagues or service users may be able to see your posts or personal information. It is best to assume that anything you post online will be visible to everyone.</p> <p>Our standards of conduct, performance and ethics say:</p> <p><i>'You must make sure that any promotional activities you are involved in are accurate and are not likely to mislead' (9.3)</i></p> <p>If you use social media to advertise or share information related to your professional practice, you must make sure it is fair and true, as far as you know. You may choose to include a disclaimer on your profile that your views are your own, and that they do not represent the views of your employer or anyone who contracts your services.</p>	<p>Our standards of conduct, performance and ethics say:</p> <p><i>9.1 You must make sure that your conduct justifies the public's trust and confidence in you and your profession.</i></p> <p>This means you need to think carefully about what you share online. Throughout your use of social media make sure that what you share does not bring your professional practice or your profession into disrepute. When using either a professional or personal account, your conduct should continue to respect service users, their carers and/or your colleagues and maintain fair access to services for all.</p> <p>Our standards of conduct, performance and ethics say:</p> <p><i>9.3 You must make take reasonable steps to make sure that any promotional activities you are involved in are accurate and are not likely to mislead.</i></p> <p>If you use social media to advertise or share information related to your professional practice, you must make sure it is fair and true, by making reasonable checks to verify it. You may choose to include a disclaimer on your profile that your views are your own, and that they do not represent the views of</p>	<p>circumstances in which the standards and guidance apply to their social media posts.</p>
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	your employer or anyone who contracts your services.	
<p>Section 2: Top tips</p> <p>The following are some top tips for using social media in a way which meets our standards. You can find information about how to put these into practice in the next section of this document.</p> <ul style="list-style-type: none"> • Think before you post. Assume that what you post could be shared and read by anyone. • Think about who can see what you share and manage your privacy settings accordingly. • Remember that privacy settings cannot guarantee that something you post will not be publicly visible. • Maintain appropriate professional boundaries if you communicate with colleagues, service users or carers. • Do not post information which could identify a service user unless you have their permission. 	<p>Section 2: Top tips</p> <p>The following are some top tips for using social media in a way which meets our standards. You can find information about how to put these into practice in the next section of this document.</p> <ul style="list-style-type: none"> • Think before you post. Assume that what you post could be shared and read by anyone. • Think about who can see what you share and manage your privacy settings accordingly. • Remember that privacy settings cannot guarantee that something you post will not be publicly visible. • Make reasonable checks to ensure that information is true and accurate. You should be aware of government public health messaging, and ensure that any views you express about it are evidenced-based, responsible, and professional. • Think carefully about who you link to, associate with, acknowledge or endorse/support online. 	<p>We have updated the top tips to ensure clarity around what language is inappropriate to use on social media.</p> <p>We have also made it clear that the HCPC is available to provide further information on the standards and cannot advise whether a particular post is compliant or not.</p> <p>We have added a top tip that advises registrants to check that information they share is accurate and true and consistent with their professional duty to promote public health. This is to help tackle misinformation, which was a key concern of our stakeholders throughout our workshops and public survey.</p>

<ul style="list-style-type: none"> • Do not post inappropriate or offensive material. Use your professional judgement in deciding whether to post or share something. • If you are employed, follow your employer's social media policy. • When in doubt, get advice. Appropriate sources might include experienced colleagues, trade unions and professional bodies. You can also contact us if you are unsure about our standards. If you think something could be inappropriate or offensive, do not post it. • Keep on posting! We know that many registrants find using social media beneficial and do so without any issues. There's no reason why you shouldn't keep on using it with confidence. 	<ul style="list-style-type: none"> • Maintain appropriate professional boundaries if you communicate with colleagues, service users or carers on social media. • Do not post information which could identify a service user and/or their carer. • If you are employed, follow your employer's social media policy. • Do not post discriminatory or offensive material. • Use your professional judgement in deciding whether to post or share something. • When in doubt, get advice. Appropriate sources might include experienced colleagues, trade unions and professional bodies. If you think something could be inappropriate or offensive, do not post it. You can also contact us for further information about the standards. • Remember that the professional standards expected of you do not change just because you are communicating on social media. • Keep on posting! We know that many registrants find using social media beneficial and do so without any issues. There's no reason why you shouldn't keep on using it with confidence. 	
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<p>Section 3: More information</p> <p>You can contact us if you have any questions about this guidance or our standards. However, we cannot offer legal advice. Our contact details are below.</p> <p>The Health and Care Professions Council Park House 184 Kennington Park Road London SE11 4BU Phone: +44 (0)300 500 6184</p> <p>You can download copies of our standards documents and other publications from our website at www.hcpc-uk.org</p>	<p>Section 3: More information</p> <p>You can contact us if you have any questions about this guidance or our standards. However, we cannot offer legal advice. Our contact details are below.</p> <p>The Health and Care Professions Council Park House 184 Kennington Park Road London SE11 4BU Phone: +44 (0)300 500 6184</p> <p>You can download copies of our standards documents and other publications from our website at www.hcpc-uk.org</p>	<p>This section remains unchanged.</p>
<p>Other sources of guidance</p> <p>We recognise the valuable role professional bodies play in representing and promoting the interests of their members. This often includes guidance and advice about good practice which can help you meet the standards that we set.</p>	<p>Other sources of guidance</p> <p>We recognise the valuable role professional bodies play in representing and promoting the interests of their members. This often includes guidance and advice about good practice which can help you meet the standards that we set.</p>	<p>This section remains unchanged.</p>

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