### **Dietetic Social Media Q&A**

### Updated April 23, 2024

### Q1: Why are the Social Media Guidelines, a "Guideline"? How is this different from a "Policy" or "Standards"?

From Government of Canada – Legislation and Guidelines, "Guidelines are... documents that are used to interpret legislation and/or regulation. Although they may be derived from legislation and are often used to advise how one might comply with a regulation, guidelines do not have the force of law." This means that you will see wording such as "recommended", "encouraged", "be mindful" etc., to denote that following these statements is an advisable way to practice dietetics.

A Policy or set of Standards are interpretations of bylaw and thereby enforceable. You may note in Policy, as in Standards, that wording such as "required", "must", "avoid" etc. is used as strong language to denote that *adhering to these statements is mandatory*.

# Q2: The social media guidelines don't help me with social media best practices such as alttext to images for screen readers or hashtag use.

As mentioned in the introduction of the Social Media Guidelines: "The purpose of this document is to guide dietetic practice and support public protection by outlining dietitian specific expectations regarding social media use and provides points to consider to uphold these professional expectations."

In terms of best practice, you can have a look at <u>Ad Standards Canada Influencer Marketing</u>. This is also referred to in the references of the Social Media Guidelines.

If you are looking for ways to maximize fluency and usability of social media in your practice, you can seek out education opportunities. You may consider networking with other private practice dietitians to determine online groups and listservs you can join to seek out education opportunities. There are likely a variety of courses that you can access to improve your social media skills (e.g., a CCP learning goal related to Equity, Diversity, and Inclusion), but this is outside of the scope of these Guidelines the mandate of the CBDC.

Q3: I am a dietitian who uses a personal social media account to engage with other dietitians in online support groups where information and knowledge is shared. I do not have a professional social media account. My activities are for personal learning, knowledge sharing, and networking and not for client solicitation. Is this appropriate?

Using your personal social media account in this context is fine, however, keep the following in mind: You are not accessing clients nor providing dietetic care, even though you are networking in a professional capacity, as a dietitian, with your peers.

It is important to realize that even when using a personal social media account, dietitians' conduct may still be observed while "off duty".

"From a personal online presence perspective, the Supreme Court of Canada has ruled that professional regulators, such as the College, have the authority to investigate and discipline registrants for off-duty conduct where a sufficiently negative impact on the profession or the public interest can be demonstrated."

Q4: I plan to post a question on my professional social media account that solicits conversation from the public about nutrition. Based on comments from the public, I would then proceed privately, by personal message, to ask the client if they would like nutrition intervention. Online convention at this time is to ask the individual publicly if they would accept a personal message and then proceed privately. Is this appropriate?

No, this is considered solicitation. Per the definition in the Marketing Standards:

"Solicitation: the act of offering a good or service for purchase. In the context of this document, it refers specifically to a registrant's attempt at actively targeting and contacting or attempting to contact a person with the aim of initiating a therapeutic relationship that is not sought out by the person."

Per Marketing Standard 1i) "Avoiding soliciting clients (including former clients). Clients should always initiate the therapeutic relationship."

Q5: Regulating whether we should be liking other users' posts seems incredibly detailed and beyond the scope of reasonable social media guidelines. Can the College provide examples of the types of content I can "like" vs content I should avoid?

If a "like" can be perceived as a conflict of interest, dietitians are at risk of violating the <u>Conflict of Interest and Sales Policy</u>. The social media guidelines, in all their detail, are designed to make dietitians think critically before they post. Please also keep in mind that they are guidelines (refer to Q1 for details).

The College cannot provide examples where a dietitian may or may not "like" a post by a follower, as this will never encompass all circumstances. However, using your professional account, you should exercise caution and choose carefully what you choose to support/like/comment on. From your personal account, you may post whatever you wish, as long as it is not perceived to have "sufficiently negative impact on the profession or in public interest [that] can be demonstrated".

## Q6: In Social Media Guideline 4(a), what does "Proactively consider how other professional expectations apply to the use of social media" mean?

There are a variety of considerations to take into account when using social media to reach your audience. Although this is not an exhaustive list, some of these might include:

- Considering your conduct while "livestreaming" (background, actions). Remember that the video is on!
- Considering record keeping and how you will capture details of your interactions with your clients.
- Ensuring ongoing consent from your audience while live.

Q7: I am concerned with the Social Media Guidelines' apparent limitation on the activities a dietitian is allowed to participate in online. The Internet operates on engagement. If the College is placing limits on "liking" only products and services within the scope of practice, this limits dietitians' visibility online. When dietitians are not allowed to engage, they become invisible. If we were allowed more freely to participate, dietitians will receive more views by the public and increase visibility (and compete fairly with health influencers), thereby increasing the volume of safe nutrition content on the internet.

Health influencers are an unregulated sector of social media, whereby dietitians cannot compare themselves. It may seem key to compete with this group, since social media is effectively a popularity contest, however, the dietetics profession is not. The Dietetic Code of Ethics, Bylaws, and Standards of Practice must be upheld. The Social Media Guidelines were born out of the need to interpret the legislation that governs our profession in a rapidly expanding sector of online presence.

You are encouraged to view the engagement with social media from the perspective of a member of the public. The College consulted with the <u>BC Public Advisory Network (BC PAN)</u> on the Social Media Guidelines. The BC PAN advisors are members of the public who have varying levels of experience with the health care system. They represent different demographics in the population, such as gender, age, ethnicity, and geographic location within the province.

The response by this group, to the Social Media Guidelines was overwhelmingly positive. The group cited a **feeling of vulnerability when accessing healthcare**, including the sense that they could easily be taken advantage of, deceived, or lied to.

For this reason, the Social Media Guidelines tie together with the <u>Testimonial Position Statement</u>, the <u>Marketing Standards</u>, and the <u>Conflict of Interest and Sales Policy</u>. These documents help registrants to interpret the <u>Dietetic bylaws</u> that govern them, specifically the key message that includes the critical importance for members of the profession to be truthful and ethical in their professional endeavours.

Q8: Am I allowed to use backlinks? Backlinking raises the profile of my social media sites and improves my online presence. Would the College provide a follow-link for registrants who want it in the public register?

[Backlinks are also known as "inbound links", "incoming links", or "one way links". They are often seen as votes and a high volume of backlinks can result in an easily searchable site by search engine.]

The issue here is that the dietetic profession is not a popularity contest, but it operates in a medium (social media) that is exactly that.

The College does not prevent dietitians form using backlinking as a social media and Internet strategy to share information. That said, the College expects registrants to be mindful about backlinking responsibly as per Marketing Standards, the Conflict of Interest and Sales Policy, and

the Testimonial Position Statement. For example, a client's review of dietitian services cannot be backlinked to a dietitian's social media profile, as that would be defined as a testimonial.

The purpose of the College public register is to list the dietitians who meet the standards to practice as a dietitian in BC, not to connect members of the public with dietitians for services they need. You may seek out other sites where you are able to advertise your services.

Q9: Why is a "Code of Conduct" or "Social Media Policy" not mandated for private practitioners? It can help dietitians consider their boundaries, consider the rationales for their requirements, and to have protocols in place to prevent harm and deal with any conflicts that arise. These documents are written as recommendations in the Social Media Guidelines (guideline 5), are not strong enough.

The College is unable to require its registrants to create a Code of Conduct or Social Media Policy at this time. It is not in bylaw to mandate one.

The Standards of Practice, Code of Ethics and marketing bylaws are the legislated requirements that define expectations of social media conduct.

#### Q10: Why do the Social Media Guidelines not speak to documentation requirements?

Social media is marketing. <u>Marketing Standards</u> (1(g)) and <u>Marketing bylaw</u> (74(8)) require appropriate documentation and conservation of publications. The College has <u>Standards for Record Keeping</u> in place that apply to both in-person and virtual practice.