

Consultation on guidance on social media for registrants

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1. Introduction

- 1.1 We are the Health and Care Professions Council (HCPC). This consultation seeks the views of our stakeholders on draft guidance for registrants about social media.
- 1.2 In this document, you can find out information about the guidance and how to respond to this consultation. The draft guidance for consultation is published alongside this document on our website.
- 1.3 The consultation runs from 3 October 2016 to 13 January 2017.

2. About the HCPC

- 2.1 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 and behaviour. Individuals on our register are called 'registrants'.
- 2.2 We currently regulate 16 professions.
 - 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
 - Social workers in England
 - Speech and language therapists

3. New guidance on social media

- 3.1 In January 2016 we published revised standards of conduct, performance and ethics ('the Standards'). The Standards now include a sub-standard about registrants' use of social media:
 - 2.7 You must use all forms of communication appropriately and responsibly, including social media and networking websites.

Why are we publishing guidance?

- 3.2 When we reviewed the previous version of the Standards, registrants' use of social media was a topic that came up frequently, including amongst registrants who were active on social media and amongst educators. We were told that registrants were increasingly using social media as a personal and professional communication tool and that some were anxious about using social media for fear of not meeting our standards. It was argued by some stakeholders that an explicit reference to social media in the Standards would be helpful to highlight that registrants' obligations to communicate appropriately and effectively also extended to use of this medium.
- 3.3 Several years ago now we published some advice on our website about using social media in a way which meets our standards.² However, during the review, we were told that registrants would value specific published guidance from us in this area. This was also a recommendation from the Professional Liaison Group (PLG) we established as part of the review process.
- 3.3 In deciding to publish guidance, we took into account the queries we have received in recent years seeking advice about this area. We also took into account the small number of fitness to practise cases we have considered which have concerned inappropriate use of social media.

What is the relationship of the guidance to other sources of guidance?

3.4 We know that some (but not all) of the professional bodies that represent the health and care professionals on our Register already produce their own guidance on the use of social media. Although there will be some overlap, this guidance is often much broader than the guidance we are consulting on. Professional bodies' guidance often includes helpful advice about topics such as making the most of social media to promote the profession; the benefits of different social media websites; how to measure the effectiveness of social media activity; and explaining social media specific terminology.

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¹ http://www.hcpc-uk.org/aboutregistration/standards/standardsofconductperformanceandethics/

² http://www.hpc-uk.org/registrants/standards/socialnetworking/

- 3.5 As a regulator, our draft guidance necessarily focuses on the ethical aspects of social media use, providing advice about meeting our standards of conduct, performance and ethics. The feedback we have received to date indicates that registrants would value clear, published guidance from us which provides reassurance so that they can use social media with the confidence that they are meeting expected standards.
- 3.6 The proposed guidance is therefore complementary to the guidance produced by the professional bodies. In the draft guidance for consultation we have acknowledged the role of professional bodies as sources of further advice.

How have we developed the guidance?

- 3.7 In May 2016 we ran an online workshop to engage stakeholders in identifying the areas that should be addressed in the guidance. It is important whenever we publish guidance that we do this in partnership with the registrants and other stakeholders who will use it, or who have an interest in its content.
- 3.8 Participants in the workshop were asked to comment on three overlapping themes:
 - **Top tips dos and don'ts**. What are the things a HCPC registrant should or should not do when using social media?
 - The challenge of using social media. What are the challenges that a HCPC registrant could face when using social media?
 - The value of using social media. How can social media be useful for your practice or help you as a service user? Can you share examples?
- 3.9 Participants were able to add ideas and to comment and vote (like / dislike) on the ideas of others.
- 3.10 We informed a range of stakeholders about the campaign. This included issuing a press release; sending a stakeholder email; utilising our existing social media channels; and directly emailing a sample comprising 5,000 registrants. We particularly wanted to target registrants who were already active on social media.
- 3.11 313 people participated in the workshop. The majority were registrants but some identified themselves as educators and a small number as service users and carers. There were 2,081 contributions (ideas, comments and votes). You can download a copy of the report of the workshop from our website.³

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³ http://www.hcpc-uk.org/publications/research/index.asp?id=1231

4. The draft guidance for consultation

- 4.1 We have used the outcomes of the online survey to help us develop the draft guidance. We also looked at the guidance published by other organisations including other regulators of health and care professionals and professional bodies.
- 4.2 In the guidance, we wanted to strike the correct balance and tone between acknowledging the value of social media as a dynamic and effective communication tool and highlighting the importance of meeting our standards. We want to make clear that our expectations of registrants' behaviour extends to their use of social media, whilst recognising that the vast majority of registrants who use this medium already do so responsibly and without any difficulties at all.
- 4.3 In keeping with the small number of other guidance documents we have produced, we wanted this guidance to be principles-based. We therefore intend the guidance to set out how we expect registrant to apply our standards when using social media in different contexts. We also want the guidance to be clear, concise and accessible.
- 4.4 We would value the views of stakeholders about how successful we have been in achieving these goals.
- 4.5 Once the consultation has concluded, we will use the comments we receive to improve the draft guidance further. We will then work with the Plain English Campaign to edit the guidance before we publish the final copy.

5. How to respond to the consultation

- 5.1 We welcome your comments on the draft guidance. We have listed some questions to help you below. The questions are not designed to be exhaustive and we would welcome your comments on any aspect of the guidance.
 - Q.1 Is the guidance clear and easy to understand? How could we improve it?
 - Q.2 Could any parts of the guidance be reworded or removed?
 - Q.3 Do you have any other comments on the draft guidance?
- 5.2 You can respond to this consultation in the following ways.
 - By completing our easy-to-use online survey: https://www.research.net/r/socialmediaguidance
 - By emailing us at: consultation@hcpc-uk.org.
 - By writing to us at the following address.

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- Please note that we do not normally accept responses by telephone or in person. We normally ask that consultation responses are made in writing. However, if you are unable to respond in writing, please contact us on +44(0)20 7840 9815 to discuss any reasonable adjustments that would help you to respond.
- 5.4 Please complete the online survey or send us your response by 13 January 2017.
- 5.5 Please contact us to request a copy of this document in Welsh or in an alternative format.
- 5.6 Once the consultation period is completed, we will analyse the responses we receive. We will then publish a document which summarises the comments we received and explains the decisions we have taken as a result. This will be published on our website.