



COLLEGE OF
OPTOMETRISTS
OF ONTARIO

PROFESSIONAL ADVISORY **SOCIAL MEDIA**

Professional Advisories are intended to provide optometrists with additional guidance and information on policies and guidelines issued by the College of Optometrists of Ontario. This advisory concerns the College's [Guidelines for the Appropriate use of Social Media by Optometrists](#), and can be used by optometrists as a further tool on how expectations outlined in the College's social media guideline can be met.

Optometry has been a regulated profession in Ontario since 1919. The College of Optometrists of Ontario is the self-regulatory authority responsible for registering (licensing) and governing optometrists in Ontario. The College's authority and limitations of its powers can be found in legislation including the [Regulated Health Professions Act](#) and the [Optometry Act](#).

Social media has grown to touch all areas of day-to-day life, and in a relatively short time, evolved into a mainstream phenomenon where people, including optometrists, obtain news, make and maintain personal and professional connections, seek information and entertainment, and interact with others.

The ever-increasing presence of social media is accompanied by deep familiarity, and turning to social media as a first means of connection can become so common that its use becomes natural. However, with these opportunities for use, social media carries a risk of increased informality, and reduced caution by the user in how or what they may communicate. This is a pitfall of social media engagement by any user, and regulated health professionals face the same pitfalls, but given their unique expectations and role in society, have an added responsibility to be attentive to the professional obligations governing their conduct, and how these merit extra scrutiny and attention when using social media.

Optometrists should refer to the College's *Guidelines for the Appropriate Use of Social Media* as the profession's authoritative position on optometrists' use of social media. This *Professional Advisory* document builds on the direction set out in the *Guidelines*, and is intended to provide additional information and guidance, through example and elaboration, on how the expectations of the *Guideline* can be met.



CONTENTS

FRAMING THE ADVISORY: A RISK-INFORMED APPROACH	1
ACTING ON THE RISKS	2
PROFESSIONALISM	3
PROFESSIONAL RELATIONSHIPS	5
PRIVACY AND CONFIDENTIALITY	6
ADDITIONAL RISK-INFORMED ADVICE	7
SUMMARY AND REFLECTION	8
RESOURCES	9

➔ FRAMING THE ADVISORY: A RISK-INFORMED APPROACH

For all of us, the increasing presence and use of social media can result in a false sense of familiarity, and reduced sensitivity to associated risks. The nature of social media itself compounds this. Platforms often model, encourage and amplify informal exchanges, and may provide easier access or greater exposure to controversial content. This setting can easily cause the user to adapt their tone to the environment, and colour both what they communicate and how they communicate it. While this can make the exchange of ideas fast and easy, it also heightens risk to users.

Optometrists are encouraged to be aware that despite the relaxed or informal nature of social media, and of its mainstreamed and frequent presence in their lives, social media participation needs to be accompanied with discretion, and should be done with a view to their professional responsibilities.

In considering the application of the College's *Guidelines* to behavior on social media, and when considering situations or scenarios that arise, optometrists are encouraged to take a risk-informed approach. Optometrists should consider professional risk in how it could arise in professional exchanges and establish and maintain this vigilance. To reiterate, the call for continued attentiveness recognizes several characteristics of social media that deserve to be at the forefront of the mind of the user, including:

- the informality of exchanges on social media
- the integration of social media to so many areas of professional and personal life
- the assumption that content is temporary
- the ease and speed of escalation of interactions on social media
- social media as both a forum and a source of AI generative text and content
- The ability of third parties to manipulate or change original postings

➔ ACTING ON THE RISKS

The layperson can easily name a series of personal consequences for their own ill-conceived, hasty or careless content shared on social media. For optometrists, the consequences can have significant professional consequences.

In light of this, optometrists are encouraged to consider their activities on social media from a risk-informed perspective, and may consider using an approach of (1) framing particular questions or actions with regards to professional risk, and (2) assessing the risk or harms to their own professionalism.

This risk-informed approach, as opposed to a rules-based model, acknowledges the inherent fluidity of situations, but also accepts the unpredictable growth and future shape of social media. The professional judgement and knowledge of optometrists will continue to be tested in unpredictable ways as technology evolves, and the risk-informed approach can provide a durable model for current, as well as unanticipated challenges.

Building on the identification of risk, and the more specific identification of professional risk, a risk-informed approach also facilitates different actions available within a professional framework: classical risk management strategies of “avoid, mitigate, transfer, accept” might serve as an initial evaluative tool for optometrists, and through that, enable the consideration of additional factors of professionalism, professional relationships, and patient privacy and confidentiality. These are discussed in this advisory.

As a further comment on a risk-informed approach to social media use, the framework can be additionally valuable when considering, like technology, profession-facing factors such as the changing and evolving nature of professionalism, emerging jurisprudence, and changes in professional technology that may be available to or expected of optometrists.

➔ PROFESSIONALISM

The *Guidelines for the use of Social Media for Optometrists* establishes a general expectation for professionalism when using social media:

... when optometrists engage in the use of social media platforms and technologies, they are expected to adhere to all of their existing professional expectations and duties, including those set out in the relevant legislation, regulations, codes of ethics, and College policies.

The *Guidelines* goes on to list the tangible expectations:

Optometrists should keep in mind the principles of good optometric practice, which are also relevant to the use of social media.

In the *Guidelines*, optometrists are advised to carry out this expectation by:

- being mindful of their internet presence and be proactive in controlling and avoiding content which may be viewed as unprofessional or personal
- proactively consider how other professional expectations apply to the use of social media
- avoid providing patient specific optometric advice online, for example, by posting information on an internet discussion forum that could be construed as optometric advice. In some circumstances, it may be appropriate for optometrists to provide health-related information that is not patient-specific in an online forum for the purpose of public and professional education
- abide by statutes and regulations related to defamation, copyright and plagiarism when posting content in blogs or elsewhere online.

This guidance can be applied in governing use of social media, but also provides a framework to elevate the identification of risk, and the framing of new or unusual scenarios. The tools that are outlined in the *Guidelines* provide reference for the measure of risk, and evaluating scenarios against risk by using established tools, positions and guidance for the profession. Optometrists could carry out the *Guidelines* by rooting the scenario on broader professional practices, including the standards of practice and other College resources

**PERSONAL AND PROFESSIONAL SOCIAL MEDIA,
PROFESSIONAL RISK**

Optometrists hold a position of trust with their patients and the public. In further considering risk, optometrists should be mindful of how it can apply to any use of social media - both professional and personal. While optometrists are encouraged to use separate personal and professional social media accounts, they should be further mindful that even when posting in a personal capacity, social media participation on personal accounts may not be anonymous, and others may be aware of the user's professional role. Professionalism is equally important in both professional and personal social media use.

➔ PROFESSIONAL RELATIONSHIPS

The *Guidelines for the Appropriate use of Social Media* by Optometrists sets out a clear standard and responsibility for professional relationships:

Optometrists have a responsibility to... maintain professional and collegial relationships with colleagues, other professionals, and in the public sphere.

With its appearance in a social media advisory, there is the possibility this could be incorrectly interpreted to apply only to individual relationships, or one-to-one exchanges and transactions, or direct messages between users. Optometrists should not overlook the expectation of the responsibility as it refers to the public sphere, and reflect on how this public sphere might occur across various social media platforms and applications.

Optometrists are encouraged to reflect on how they can meet the expectations of the *Guidelines*, including consideration of a risk-informed approach, in the following ways:

- Operate online as a professional, and as you would in the community
- Ensure that your comments do not incite others to make discriminatory or other professionally unacceptable comments
- Use professional social media accounts for professional electronic communications; avoid using personal accounts
- Where applicable, be aware of an employer's applicable policies and programs regarding the use of social media.

➔ PRIVACY AND CONFIDENTIALITY

The *Guidelines for the Appropriate use of Social Media by Optometrists*, while speaking specifically to social media use, also report the general duty of optometrists:

Optometrists have a responsibility to safeguard patient privacy, confidentiality and trust by protecting patient information

The *Guidelines* goes on to set out additional and tangible direction to optometrists specific to social media:

- refrain from invading the privacy of patients by seeking out information about them that may be available online

This reflects broader statutory requirements under the *Personal Health Information Protection Act, 2004*, and College standards relating to patient privacy and confidentiality.

The *Guidelines* also directs that members:

- refrain from posting identifying information about patients in any context online; for example, in a professional blog, video-sharing media, or discussion forum

In certain situations, however, optometrists may consider approaches that would de-identify the information about a patient, which would entail removing any circumstances that it could be utilized to identify the individual, and consider obtaining patient consent for posting even de-identified information whenever possible given the permanent nature of the internet.

➔ ADDITIONAL RISK-INFORMED ADVICE

Optometrists might consider these additional measures and practices when considering their social media activity. While these do not fall into any one single category in this advisory, optometrists are encouraged to consider adopting additional practices and safeguards, and reflect on the purpose and intention of actions such as:

- Use account settings that will provide the highest privacy levels for any of your content or information that might appear on the social media platform
- Monitor and revisit privacy and security settings of accounts and personal content on social media platforms
- Monitor announcements on social media accounts relating to upcoming changes in security policy or settings
- Assume that content you post can be accessed or altered
- Assume that content you post can be used by generative AI
- Review and understand all user agreements before providing consent
- Maintain awareness of what other users may post on social media about you or containing your image, including photos, posts or other content (if you discover content related to you, ask the user to remove it and document the request).

➔ SUMMARY AND REFLECTION

This advisory encourages optometrists to adopt a risk-informed approach to social media use that is guided by professional expectations, standards of practice, and regulations, and the safeguarding of patient privacy and confidentiality.

While professional conduct and behaviour are expected of the optometrist in any scenario, the professional's use of social media carries additional and particular considerations, and optometrists should ask themselves:

- Am I using social media in a manner that is consistent with my professional identity?
- Are there any risks I have taken in my posts and social media presence that I need to mitigate?

Optometrists should also consider the importance of:

- Recognizing evolving and pervasive risks in light of evolving and pervasive social media
- Acknowledging that the tone and speed of social media can disguise that content can remain forever, and that social media posts can be accessible by multiple parties
- Referring to College guidelines, policies, and standards regarding general professionalism, and recognize these are 'living' documents that change and evolve.

➔ RESOURCES

COLLEGE OF OPTOMETRISTS OF ONTARIO

- [Optometric Practice Reference - Standards of Practice](#)
- [Guidelines for the Appropriate use of Social Media by Optometrists](#)

OFFICE OF THE PRIVACY COMMISSIONER OF CANADA

- [Social Media \(Landing Page\)](#)
- [Staying Safe on Social Media](#)
- [Privacy and Social Media in the Workplace](#)
- [Tips for Using Privacy Settings](#)
- [The Risks of Metadata](#)

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER OF ONTARIO

- [De-identification](#)
- [Privacy and Security Considerations for Virtual Health Care Visits](#)

LEGISLATION

- [Optometry Act, 1991](#) and the regulations made under the Act
- [Regulated Health Professionals Act, 1991](#)
- [Personal Health Information Protection Act, 2004](#)

These *Guidelines* have been informed by concepts in the document [Advice to the Profession: Social Media](#) by the College of Physicians and Surgeons of Ontario.