Guidance for Pharmacists on the use of Digital and Social Media

Pharmaceutical Society of Ireland

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1. Introduction

The purpose of this guidance is to ensure that pharmacists are cognisant of their responsibilities to ensure that their online activity is consistent with their professional role.

The rapid growth in the use of digital and social media provides both opportunities and challenges to all healthcare professionals, including pharmacists, as it has changed the way many people seek and receive health information. Embracing digital media, as an additional patient communication tool, has great potential to contribute to public health and patient education. Responsible use of digital and social media has the ability to bring many benefits to pharmacist education and professional development.

However, pharmacists should also consider the potential consequences of providing information, services and products online. The rapid growth in the use of digital and social media has prompted many regulators to produce guidance to healthcare professionals in order to ensure patient safety and reduce the possibility of behaviour that might give rise to patient complaints.

The Code of Conduct for pharmacists requires that pharmacists exercise their profession in a manner that is directed to maintaining and improving the health, wellbeing and safety of patients and the public. Pharmacists should ensure that their online interactions are in accordance with the principles laid down in the Code of Conduct.

Pharmacists must ensure that their online interactions promote the highest standards of patient safety. Information provided must be accurate and relevant. Patient confidentiality must be preserved. Patient interactions should be respectful and ensure that patients are afforded the best possible pharmacy care, treatment or service.

1.1 Digital and Social Media

Digital and Social Media include but are not limited to the internet, websites, application software (apps) and websites which allow the generation and sharing of user-created content e.g. social networking sites (such as Facebook, LinkedIn, Twitter etc.), blogs and wikis.

Key Points

- Interactions through digital and social media are subject to the same professional standards and ethical considerations as other personal or public interactions.
- Consider how best to separate your online professional and private profiles and interactions.
- Preserve patient confidentiality and privacy.
- Ensure that all information posted online is appropriate for the audience that can access it and the location in which it is posted.
- Evaluate health information for quality and accuracy before posting online.
- Develop policies for the professional management of digital and social media.

2. Guidance

Pharmacists may use social media in a professional or personal capacity. Regardless of the capacity of the engagement, common sense and professional judgement should always be exercised. The possible consequences of all interactions should be considered in advance including the potential for breach of patient confidentiality and defamation. In keeping with the Code of Conduct, pharmacists should use social media and other forms of electronic communication appropriately and responsibly, both professionally and personally. If a pharmacist becomes aware of potentially inappropriate online interactions by another member of the pharmacy profession, they should take
appropriate action in line with the Code of Conduct.

The internet should be treated as a virtual public space assuming that privacy settings can be changed and that privacy technology may be breached. Information posted online is likely to be permanent and may be impossible to delete. Nonetheless pharmacists should aim to assure the greatest degree of personal protection when selecting privacy settings. All engagement should consider the possibility for other persons to assume false identities and present misleading information online. Pharmacists should consider who could claim ownership of the data which they post or acquire online and the potential ramifications of such a claim i.e. is data owned by the pharmacist, the patient, the web application provider etc.

### 2.1 Professional Boundaries

Use of digital and social media can lead to the blurring of professional and personal lives e.g. it may be a violation of professional boundaries to introduce patients to certain aspects of your private life. Consider how best to separate your online professional and private profiles and interactions.

### 2.2 Privacy and Confidentiality

Standards of privacy and patient confidentiality must be maintained online, and pharmacists must not post identifiable patient information without the patient’s informed consent. Where anonymised patient data is posted, ensure that this data cannot be linked back to the patient. Remember that, although individual pieces of information may not alone identify a patient, a combination of online information could unwittingly compromise confidentiality and give rise to patient complaints. All online interactions must comply with Data Protection Legislation.

Patients’ online privacy should be respected and the internet should not be used as a source of information about your patients.

### 2.3 Information Suitability

As healthcare professionals, pharmacists should be cognisant that their actions, including those online, are held to a higher standard of accountability by the public and should therefore think carefully about the implications of these interactions. Pharmacists should ensure that all information posted online is appropriate for the audience that can access it and for the location in which it is posted. Material posted should not damage the good name of the pharmacy profession or include bad language, profanity, violence, extreme or intolerant views. It should not include inappropriate photographs or depictions of questionable behaviour - inappropriate materials have the potential to undermine patient confidence and have a detrimental effect on your professional standing. Derogatory, unsubstantiated, unsustainable or personal comments about patients, colleagues, other healthcare professionals or your place of work should not be made. Pharmacists should not engage in behaviour that could be perceived as harassment or bullying. Online information should not draw an invidious distinction between the pharmacy or pharmacist in question and any other pharmacy or pharmacist.

Pharmacists should be cognisant of their online identity and reflect on how information, photographs or choice of an email address may impact on their professional standing or employment prospects. It should be borne in mind that content posted online early in a pharmacist’s career, or while studying pharmacy, may subsequently have negative professional consequences.
2.4 Information Quality

The provision of quality health information, in all mediums, has the potential to impact positively on patient and public health. In order to ensure the quality of health information, it should be rigorously evaluated before being posted online. Information should reflect best practice and current evidence, and be regularly reviewed and updated as required. The source or basis of the information should be indicated e.g. if it is based on scientific review or personal or professional opinion. Information should be truthful, presented in a professional manner and easy for patients to understand. Copyright and plagiarism laws should be observed and conflicts of interest acknowledged.

Where individual patient advice is provided, extra care must be taken and the constraints of online interactions highlighted and considered. Pharmacists should always ensure that, regardless of the medium of communication, they can still fully discharge their professional responsibilities. Healthcare queries submitted online should be reviewed and responded to in a timely and appropriate manner. Pharmacists should ensure that the provision of online advice is covered by appropriate professional indemnity arrangements. Product information should comply with the marketing authorisation and legislative requirements.

2.5 Information Security

Where patient information is collected by the pharmacy/pharmacist using online technologies, measures must be put in place to assure the security and confidentiality of the information e.g. by use of encryption, secure servers etc. Pharmacists should ensure that information is not accessible to third parties e.g. database administrators, non-pharmacist staff. Such security measures should be regularly reviewed and updated to ensure that security is retained and data protection legislation is complied with. Where websites or application software are used to gather patient data, a privacy policy should be displayed.

2.6 Accountability

Pharmacy websites, social media pages or application software (Apps) should clearly display the name and address of the relevant retail pharmacy business and the name of the supervising pharmacist. Facilities for visitors to websites to provide feedback on the quality of information or to contact the person responsible for managing the site should be clearly indicated. Complaints should be reviewed and responded to in a timely and appropriate manner.

2.7 Pharmacy Policies

Where information or services are provided in a professional capacity, policies should be developed to ensure that all interactions are legal, ethical, in accordance with all relevant guidelines and legislation and that patient safety is assured. Superintendent and supervising pharmacists should develop policies which provide clear guidance to staff on appropriate online behaviour and the observation of patient confidentiality. Policies should be reviewed and updated regularly and in response to any relevant incident or complaint. Superintendent and supervising pharmacists should also ensure that all staff are appropriately trained in these policies and re-trained where necessary following any update of a relevant policy.

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