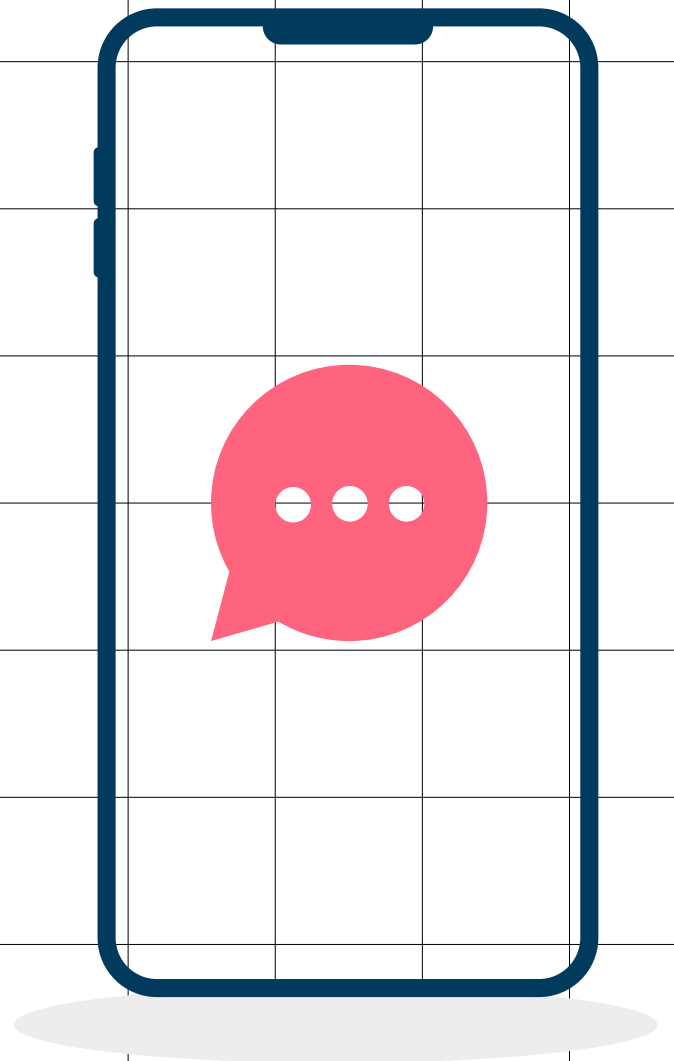


GCC Registrant Toolkit

# Social Media and Messaging

Toolkit



# The power of social media and messaging

Within the last 20 years, social media and messaging have become an integral, and at times valuable, part of our society. Various platforms, such as Facebook, Twitter, YouTube, Instagram and WhatsApp, allow people to share content easily and freely with each other. For business, the use of social media and messaging platforms has added an additional marketing and communication channel, enabling rapid and direct interaction with existing and potential customers.

However, for all the advantages and benefits that social media and messaging offer, there are several common pitfalls that, if not avoided, can create reputational and legal problems for an individual or business.

As a chiropractor registered with the General Chiropractic Council (GCC), there are several requirements that you must consider, when marketing or communicating your service or business via social media and messaging.

Standards B3, B4 and B5 of the GCC's Standards of Conduct, Performance and Ethics for Chiropractors (the **GCC Code**) contain provisions relating to marketing and communicating of chiropractic services and businesses. Furthermore, since 2011 the Advertising Standards Authority (ASA) CAP Code has extended its remit to cover advertising content on company websites and their social media accounts.

The purpose of this GCC social media and messaging toolkit, is to help chiropractors avoid some of the more common issues that have arisen when promoting their chiropractic businesses or services, some of which have led to Fitness to Practise complaints.

The toolkit is not exhaustive, but provides you with top-line advice on what is likely to be acceptable or unacceptable in respect of social media content, as well as providing some useful links and advice on maintaining your online presence. We would also recommend reading the GCC **advertising** and **website** toolkits for further guidance.

Finally, for ease of reading, social media is defined as including messaging applications for the remainder of this toolkit.

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# Introduction to social media

## What is social media?

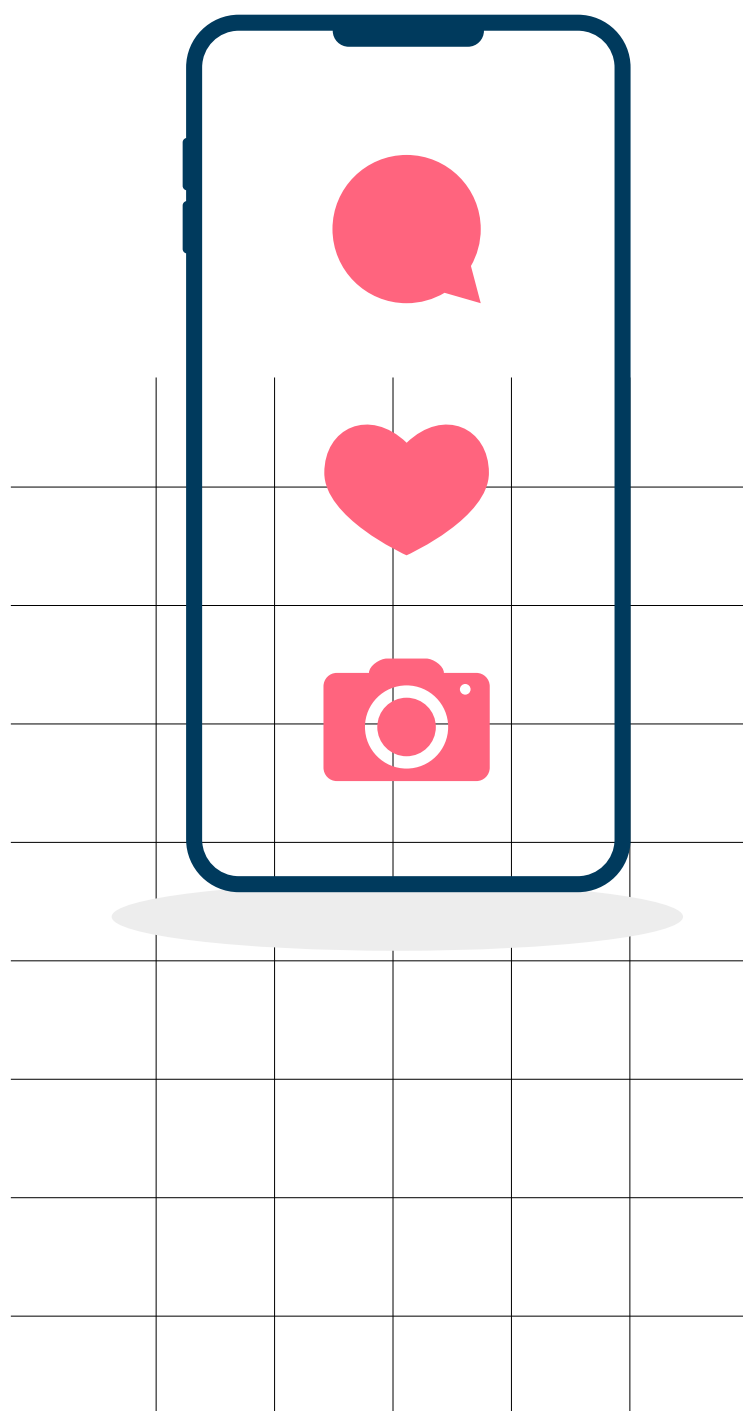
Social media is an all-encompassing term for web-based applications that allow people to create and exchange content. This can include blogs, forums and messaging in written, image or video formats. The most common and popular social media platforms in the UK are Facebook, Instagram, Twitter, iMessage, WhatsApp, YouTube and Reddit.

The benefit of a well-developed and maintained social media presence is an increased profile with patients (existing or potential), the public, other chiropractors and healthcare professionals, academia, and business and media connections (journalists often use social media to source information and new contacts).

However, for all the positive benefits of social media, its ability to instantly create, comment on or share content can also prove problematic. In many cases a rash, ill-thought-out or ill-informed comment, posting or message can lead to negative feedback from followers and, in some cases, lead to complaints being made to the Advertising Standards Authority (ASA) or the GCC.

Social media can also be a time-consuming channel, be it creating or sourcing content. It is advisable to consider which platforms best reach your patients/customers, existing and potential. Creating accounts across multiple platforms that are rarely used or updated can damage your brand, whereas one well-maintained and populated account can do wonders for your reputation and business.

Finally, although social media platforms may offer different services, content upload options, and be aimed at different groups – eg. LinkedIn is primarily aimed at the business community – rules on what you can upload or share generally apply across the board.



## Security and privacy of your account

For both business and personal social media accounts, it is recommended that you fully understand the security and privacy settings for each platform. Remember that terms, conditions and settings vary between platforms, including copyright ownership of uploaded imagery.

### Security

As with all secure business activity, such as maintaining patient records, it is essential that you keep control of who can access your accounts and upload content. It is not uncommon for businesses to forget to remove ex-employees from their accounts.

Ensure your username and passwords are secure. Avoid simple passwords, eg. 1234 or password (65% of people use easy passwords), and try not use the same password for every account. If you suspect a security breach, change all passwords immediately, even if you don't think your other accounts have been affected. Password vaults are readily available for mobile or desktop systems.

### Privacy

All social media platforms have options to vary the privacy and access settings of your account, ie. to allow only accepted followers to view content.

For most businesses, accounts are generally open, to allow the content to be seen by the widest audience possible, helping to attract new customers. However, even with a fully secure and follower-only account, content can still be leaked, accidentally or otherwise. Therefore, do not post anything that could be problematic for you or your business, today or in the future (we have all read stories of old postings and comments from celebrities coming back to haunt them!).

## What content can I post?

All social media platforms have their own codes of conduct, to prevent content that is deemed hurtful, inciteful or hateful to others (racist, homophobic, sexist, distasteful or inciting of violence being the most common reasons why posts or comments are flagged).

For a regulated profession such as chiropractic, registrants need to ensure they are compliant with the GCC Standards of Conduct, Performance and Ethics for Chiropractors (the **GCC Code**), specifically Standards B3-B5. In summary, you have a responsibility to ensure information that you post or share is legal, decent, honest, truthful and puts the health and well-being of patients first. There is no exception to this rule. (See section: Four rules when posting social media content.)

## Confidentiality

Maintaining full confidentiality of patients is expected from all chiropractors, be it face to face or in writing, including patient files, advertising, website and social media content. Standard B4 of the GCC Code states that all registrants must:

"strictly maintain patient confidentiality when communicating publicly or privately, including any form of social media or when speaking to or writing in the media"

This Standard is reinforced by Standards B3 and B5.

B3: "Ensure your advertising is legal, decent, honest and truthful as defined by the Advertising Standards Authority (ASA) and conforms to their current guidance, such as the CAP Code."

B5: "Ensure your behaviour is professional at all times, including outside the workplace, thus upholding and protecting the reputation of, and confidence in, the profession and justifying patient trust."

If you wish to post testimonials, ensure you have full written consent from the patient or customer. We would also recommend that you allow them to view the wording and/or imagery before posting.

### **Personal and business social media boundaries**

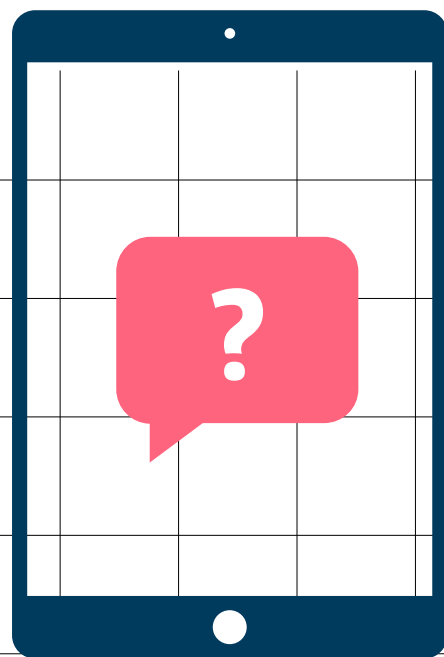
Alongside our business activity, many of us also have personal social media and messaging accounts. However, as a chiropractor, you have a responsibility to ensure that comments regarding healthcare issues on personal accounts remain GCC Code-compliant.

The GCC has received complaints where registrants have made comments on their personal social media accounts relating to issues of public health, such as Covid-19 and the need for/use of PPE, that have broken GCC rules and guidance. If personal account postings or comments can be identified as from a GCC registrant, you may still attract a Fitness to Practise complaint.

Finally, postings or comments on a follower-only private account can still be leaked. Even if you decide to delete a posting, comment or message, it may already have been forwarded by a follower, innocently or otherwise.

#### **TIP:**

**If in doubt, don't post, comment or message. Ignorance is not an excuse in a GCC Fitness to Practise complaint.**



# Four rules when posting social media content

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As stipulated in B3 of the GCC Code, registrants must ensure their advertising is legal, decent, honest and truthful.

These four rules are also a useful guide when posting social media (non-advertising) content and can help you avoid a GCC Fitness to Practise complaint. In summary, all content that is posted or shared on your account (and you are responsible for all owned or shared content on your account) should be:

1 Legal

2 Decent

3 Honest

4 Truthful

## 1 Legal

The business or service being promoted must be legal and comply with all relevant UK laws.

**Example:** A person cannot call themselves as a chiropractor if they are not registered with the General Chiropractic Council. This would be a breach of Section 32 of the Chiropractors Act 1994.

## 2 Decent

Content should not cause serious or widespread offence, especially in the areas of race, religion, gender, sexual orientation, disability and age.

**Example:** A chiropractor posts an advertisement or comment looking to attract more female patients to their practice. They state that women are less able to tolerate pain than men. This would likely cause widespread offence to women on the basis of their gender.

## 3 Honest

Posting false and/or deceptive messages or facts with no grounds or merit to justify the statement.

**Example:** Chiropractors may treat patients who suffer from multiple sclerosis as a comorbid condition. However, to imply that a chiropractor can "treat multiple sclerosis" would create the false impression that chiropractic is an effective treatment for this condition.

## 4 Truthful

The posting and/or content must not omit facts that may lead a person to believe something that is not true.

**Example:** A person posts a statement that they "studied chiropractic at university" when they attended the programme for only one day before leaving the course. The statement is correct (they did study chiropractic, albeit for one day) but not truthful, as most people reading that statement would assume the person had completed the programme and qualified as a chiropractor.

As outlined, the guiding principle of the ASA CAP Code, as reflected in B3 of the GCC Code, stipulates that all advertising or promotion must be legal, decent, honest and truthful. However, as healthcare professionals, you have a responsibility to ensure all claims made, be it via advertising, on your website or through social media, do not materially mislead the public and/or patients.

Therefore, throughout the CAP Code, and in supplementary CAP guidance on substantiation of health claims, registrants are required to ensure content aimed at patients and the public is accurate and verifiable, socially responsible and free from misleading claims.

## Accurate and verifiable

Can you provide accurate, verifiable and robust proof for all the claims made about the service or business? If not, it will be deemed as misleading.

**Example:** A claim of being the “best chiropractor in the UK” can be made only if you have verifiable and independent documentation to justify this statement. If not, the claim is likely to be determined as misleading.

## Socially responsible

Not depicting, promoting, encouraging or condoning illegal, unsafe or anti-social behaviour.

**Example:** Discouraging vaccinations or promoting excessive concerns regarding the safety and efficacy of vaccines.

## Misleading Claims

When applying the CAP Code, the ASA's approach is that advertising, direct marketing and/or sales promotions, including those on website and social media, must not:

- 1) Claim an absolute guarantee of a cure
- 2) Claim that chiropractic treatment is risk-free or safer than other healthcare treatments
- 3) Present anecdotal evidence as being proven or scientific
- 4) Discourage an individual from seeking medical treatment from a general medical practitioner, if appropriate
- 5) Claim that chiropractic care can treat any condition unless that claim is substantiated in compliance with the CAP Code

# Good practice in social media

You should regularly curate your social media accounts, to ensure they are up to date and provide followers with useful and informative content.

The following are some suggested rules that you may wish to adopt/apply in your social media planning and maintenance.

## 1) Reply to messages and comments

Social media allows you to communicate quickly with patient and customers. In return, people will expect you to respond to their comments and questions expediently. A 60-minute response rate is considered the ideal benchmark. However, within 24 hours is considered acceptable for a small business.

## 2) Be nice, even if you receive negative comments

Do not ignore or block negative comments, but try to answer in a constructive and positive manner. If you receive comments that you believe break platform rules, eg. they are racist or abusive, report the person and post to the platform provider. Avoid getting into an argument.

## 3) Limit your hashtags

It is easy to get carried away with hashtags. A maximum of three hashtags for any one message is a good guide (some suggest just one). When creating or using a multi-word hashtag, cap the first letter of every word, eg. #GeneralChiropracticCouncil, not #generalchiropracticcouncil. Finally, don't hijack other people's hashtags (general hashtags are fine, but not other businesses).

## 4) Avoid 'Indiscriminate following'

Follow people or companies who are valuable and influential to your business or service.

## 5) Share content from others

For most businesses, producing enough content for their social media accounts can be a difficult task. Sharing content from others can help populate your account, as long as it conveys your overall message or objectives. This can also make your account a more valuable and insightful profile to follow, than simply talking about yourself.

If using Twitter, set up and use the list function. This allows you to quickly review other key accounts and retweet relevant content. A good ratio is 70% other people's content and 30% your own. If sharing content, give a shout-out to the content provider.

Finally, be sure you are sharing content from a reputable source. Check beyond one posting or comment, to ensure they are not posting offensive or contradictory content that may damage your brand. Remember, sharing content and links to disreputable people/organisations, may lead to an ASA or GCC complaint.

## 6) Limit and space your messaging

A useful guide is one Facebook or LinkedIn post, ten tweets and two Instagram posts per day. Try to space your postings, eg. sending ten tweets in ten minutes limits the impact of your messages and bombards followers. Some platforms, such as Twitter, have scheduling options.

## 7) Don't oversell, inform

Although your aim may be to sell/promote your business or service, overt selling can become tiresome and be a turn off. Social media is more about promoting your brand and providing value and enrichment than simply pushing your service or business.

## 8) Don't like your own content

You wouldn't have posted the content if you didn't like it!

## 9) Don't post pictures of customers or named comments without permission

Without these permissions, you could fall foul of ASA, GCC and General Data Protection Regulation (GDPR) confidentiality rules.

## 10) Don't ask people to follow you

"Sympathy" follows can look desperate. You want others to follow you because you are interesting and insightful.



# What treatments can I advertise?

In 2017, guidance was produced by the Committee of Advertising Practice on treatments that chiropractors can claim to treat. They are:

Ankle sprain (short-term management)

Cramp

Elbow pain and tennis elbow (lateral epicondylitis) arising from associated mus-culoskeletal conditions of the back and neck, but not isolated occurrences

Headache arising from the neck (cervicogenic)

Inability to relax

Joint pains (including hip and knee pain from osteoarthritis as an adjunct to core osteoarthritis treatments and exercise)

General, acute and chronic backache, back pain (not arising from injury or accident)

Generalised aches and pains

Lumbago

Mechanical neck pain (as opposed to neck pain following injury, ie. whiplash)

Migraine prevention

Minor sports injuries and tensions

Muscle spasms

Plantar fasciitis (short-term management)

Rotator cuff injuries, disease or disorders

Sciatica

Shoulder complaints (dysfunction, disorders and pain)

Soft tissue disorders of the shoulder

Although these treatments are listed, any promotion, online or otherwise, must still comply with all other CAP Code requirements and the four rules. For example, you cannot promote one of the permissible treatments if you have no experience in undertaking that procedure (the GCC Code, Standard G3: "Chiropractors must work within the limits of their own knowledge, skills and competence.").

The GCC advises all registrants to check the latest Advertising Guidance regarding medical conditions that chiropractors can claim to treat (search: ASA Health Chiropractic), to ensure no updates or amendments have been made that may lead to an ASA or GCC complaint and/or investigation.

# Claims and treatments beyond chiropractic

As outlined in What treatments can I advertise? on page nine, there is a wide range of conditions for which chiropractors have been trained to diagnose, treat, manage and/or prevent. Furthermore, there is a substantial body of evidence supporting chiropractic treatment for these conditions. These conditions therefore meet the four ASA rules, as outlined on page six.

Beyond these conditions and/or treatments, chiropractors can also provide valuable guidance to patients, helping to improve their overall physical, emotional and social wellbeing. This can include preventative advice, suggesting exercises and routines, helping with posture, and providing general health and wellness advice.

However, the GCC and ASA have received complaints from registrants, the public and organisations when chiropractors have “suggested or implied” that chiropractic can address wider health issues without any credible evidence or substantiation.

One such claim which has received attention and complaints is subluxation, although “innate intelligence”, “adjustment”, “power that heals a body”, “treat the cause and not the symptoms”, “long-term chiropractic care can prevent illnesses”, and anti-vaccine or protection/treatment against Covid-19 claims have also been highlighted in complaints. At this time, no verifiable or substantiated research or body of evidence to the CAP Code standards has been produced regarding these treatments or claims.

Regardless of personal belief, theory or philosophy, promotion of these treatments and/or claims can be potentially damaging to patients, as well as affect the trust and confidence in the chiropractic profession with the public, NHS, other medical professions and government. The GCC and ASA have a duty of care to protect the public from unfounded and non-evidenced claims.

## Covid-19

Some chiropractors have claimed or implied that spinal adjustment and/or manipulation may protect patients from contracting Covid-19, boosting their immune system and aiding their recovery. The GCC is clear that there is no credible scientific evidence that supports these claims, and chiropractors must not link treatments to Covid-19 in any way. Chiropractors making such claims will be in breach of the requirements set out in the GCC Code, and regulatory action will be taken. Where the GCC sees evidence of such claims, it will act.

## Subluxation

The use of the term “subluxation”, and claims that imply subluxations inhibit the body’s healing mechanisms and/or that the body will not function or heal if subluxations are present and chiropractic treatment not provided, cannot be used in the UK as they do not meet ASA CAP Code and GCC standards.

Any claims will be viewed as misleading, as there is no verifiable scientific research or body of evidence to support these claims or theoretical model. See GCC guidance on **Chiropractic Vertebral Subluxation Complex**.

## Definition of ‘body of evidence’

Any objective claim must be substantiated by available, credible and recognised scientific knowledge. To justify any claims (and it will be incumbent on the registrant to justify these claims), a body of evidence must be presented that meets CAP standards.

A “body of evidence” can include single and double-blind studies and observational human studies. The evidence should normally include one adequately controlled experiential human study, although a controlled observational study may be acceptable in some circumstances. Requirements on methodology, size, duration and nature of the study group must comply with CAP requirements, as well as an objective review of all the data, if the report has not been published in a reputable peer-reviewed journal.

# Presenting your credentials

As a chiropractor, you are in the favourable position of being able to state that you are registered with the General Chiropractic Council.

The GCC encourages all registrants to promote their credentials openly, but above all accurately and honestly, on their business social media accounts.

## When can I state I'm a chiropractor?

At the time that you post or message content that is visible to the public, you can state you are a chiropractor if:

- 1) You are listed on the GCC register of chiropractors and your fees are fully paid
- 2) You have not been suspended or removed from the GCC register of chiropractors

If you have changed to non-practising status, all materials must make clear your non-practising status.

## Can I use my 'Doctor' title?

If you use the courtesy title of Doctor, or its abbreviation Dr or DC, you must state clearly within any public-facing content that you are not a registered medical practitioner, but a Doctor of Chiropractic (DC).

The GCC may undertake a Fitness to Practise investigation where a chiropractor does not clarify they are a Doctor of Chiropractic.

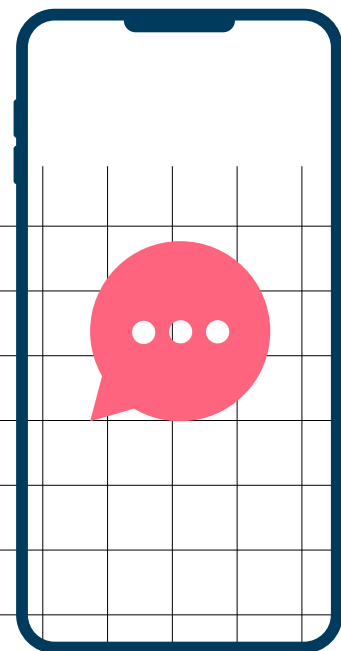
## Using the GCC "Registered" logo and your registration number

GCC research has found that the public and patients are reassured when they know that a healthcare professional is regulated. This is seen with general medical practitioners, dentists and pharmacists.



However, public awareness of some regulated professions, such as chiropractors and osteopaths, is lower. The GCC therefore recommends that registrants use the GCC "Registered" logo on printed and online marketing content, where appropriate.

Further assurance of your credentials can be offered by providing your GCC registration number. This allows all potential and existing patients to verify your professional credentials through the GCC **Find a Chiropractor** search function on the GCC website.



# Advertising Standards Authority and CAP Code

The **Advertising Standards Authority (ASA)** is the self-regulatory organisation for the advertising industry. Its role is to regulate the content for businesses or services provided, to ensure it is compliant with the **Advertising Standards Codes**. Since 2011, the ASA has assumed responsibility for overseeing website and social media advertising in the UK.

The ASA will respond to concerns and complaints from both consumers and businesses regarding what is said in an advertisement, on a business website or social media account, and will act if it is found to be misleading, harmful, offensive or irresponsible. The ASA is there to protect existing and potential customers, or in the case of chiropractors, patients.

The GCC may also undertake a Fitness to Practise investigation, if a complaint is made regarding misleading communications from registrants. This may also include a referral to the ASA.

## What is the CAP Code?

Commonly known as the CAP Code, its full title is the UK Code of Non-broadcast Advertising and Direct & Promotional Advertising. The ASA's remit is to ensure everyone who undertakes non-broadcast advertising or promotion, complies with this code.

The latest CAP Code was published in 2010, although there have been several updates, which can be found in the Register of CAP Code Changes.

The Code is divided into 22 sections, some general such as **Compliance** (section 1) and **Use of Data** (section 10), and others that are more specific, such as **Children** (section 5) and **Medicines, Medical Devices and Health-Related Products** (section 12).

Of note for chiropractors is **Rule 12.1** which states that all "objective claims" must be substantiated by evidence, if relevant, consisting of trials conducted on people.

The CAP Code itself is written and maintained by the **Committee of Advertising Practice (CAP)**, the partner organisation to the ASA. In addition, the Committee issues guidance on what some professions, such as chiropractic, can advertise or claim. See section What treatments can I promote.

## ASA and social media

Since 2011, the ASA has applied the CAP Code to advertising on business websites and social media accounts. However, this does not mean that all written content on social media accounts is under its remit or scrutiny. Only content that can be considered advertising, ie. content that is "directly connected with the supply of goods, services, opportunities or gifts".

However, non-advertising comments, postings and content may be subject to the GCC Code, especially if they contravene GCC rules and guidance.