



**COSCA (Counselling & Psychotherapy in Scotland)**  
**16 Melville Terrace | Stirling | FK8 2NE**  
**t: 01786 475 140 f: 01786 446 207**  
**e: [info@cosca.org.uk](mailto:info@cosca.org.uk) w: [www.cosca.org.uk](http://www.cosca.org.uk)**

## **COSCA Guideline on Online Networking, Email and Social Media**

### **Introduction:**

The ethical issues and challenges of online networking, email and social media are very similar to those of face to face counselling practice as laid down in the COSCA Statement of Ethics and Code of Practice. Both ways of working need to focus on the protection of the public and are covered by paragraphs 2.6 and 2.4 of the COSCA Statement of Ethics and Code of Practice as follows:

'2.6 Members recognise and respect diversity and differences between people. Members do not practise, condone or encourage unjustified discrimination or oppressive behaviour.'

'2.4 Members demonstrate integrity, openness and objectivity to their clients, and colleagues. Members do not exploit or harm their clients, or colleagues.'

However, there are slightly different technical, ethical and legal issues and challenges when using online networking, email and social media. This guideline covers these differences.

Members of COSCA are not required to have an online presence or to use email or social media. For those who choose to do so, please see the link below to the slides of the presentation delivered by Dr Fiona Millar, University of Stirling, at COSCA's Annual Ethical Seminar 2017. The presentation covers in particular the development and kinds of social media, their benefits, arising issues and good practice tips associated with using them.

### **Guidance:**

In the use of online networking, email and social media, COSCA members are advised to take account of the following:

1. Client confidentiality and privacy should be protected. Any personal data, as defined by the current Data Protection (1998) and the General Data Protection Regulation (2016) to be implemented in 2018 should only be used with the client's consent in advance and/or any agency policy.

2. COSCA members should check the social media site host's own privacy agreements and terms of conditions prior to their use and ensure that these conditions do not allow the host to retain personal data of clients for their own use as this may be a breach of their rights to confidentiality.

3. Storage of personal client data may require COSCA members to register with the Information Commissioner's Office (ICO) as a Data Controller. <https://ico.org.uk/>
4. Client confidentiality should be maintained by safely securing the passwords used for access to social media sites. Confidential emails should also be encrypted.
5. COSCA members should not compromise their work with clients by their use of email and social media. They should, therefore, keep separate their private and professional lives when online, when using their work and personal phones, and when using email and social media to avoid harmful dual relationships. This extends to COSCA members not being permitted to allow 'friending' on their personal social media pages by their clients. ('Friending' allows people to be an online friend.) This can create a personal relationship with clients outside of their professional role and can leave COSCA members open to allegations regarding comments they make online on their personal pages. COSCA members can, however, send private messages to their clients using their professional page without 'friending' their clients or vice versa.
6. Privacy settings within the terms and conditions of social media site hosts should be used on personal use of social media to ensure that clients only see information that is appropriate for them to see. In particular, COSCA members should check the third party access on privacy settings allowed by the social media host. When uploading photos and videos, COSCA members should check their privacy settings on the social media services used as well as on the device used. They should also ensure that they have appropriate images for display pictures for their social networks. It should be noted that the use of false/fake names may not be permitted within the above real name terms and conditions, and that only names used in real life may be permitted to be used by the above social media site hosts.
7. COSCA members should consider contingency measures for dealing with the disruption to their use of social media with clients e.g. site and internet outages, power failures etc.
8. Devices used to process personal data of clients should be used in locations that are deemed confidential and will protect client's data from unauthorised others. It should be noted that the internet access provided in some locations does not ensure this protection e.g. in some coffee shops and on many trains. Devices used for social media should be password protected.
9. COSCA members should check with their respective insurance companies that they are covered to use social media with clients within and outside of the UK. If COSCA members are working online internationally and/or in North America, they will also need to check and meet the specific licensing/qualifications requirements to practice in those countries, as these requirements apply even if working online. For more information on extended practice, please see the COSCA Guideline on the Use of Technologies – under ethics on [www.cosca.org.uk](http://www.cosca.org.uk)
10. COSCA members should seek the informed consent of their clients if they wish to search online and on social media sites for information about them. Doing so without consent, and with consent but without a justifiable therapeutic reason for conducting such a search, could breach ethical boundaries with the client and disrupt the therapeutic alliance.
11. Posting photographs on social media sites makes them available to visitors. To protect your intellectual property, it is possible to reduce the resolution of the photograph to, for example, 800 x 600 resolution or add a watermark to make it suitable for viewing online but not for printing.

12. COSCA members should be professional in tone and good taste, and strike the balance between informality and formality.

13. The internet is not anonymous, nor does it easily forget online activity, even if you think you have an anonymous account. Everything written online can be traced back to its author. It can also be replicated through trackbacks, reposts and references. COSCA members should, therefore, say online what they would say in public or in person, and think twice before posting.

14. COSCA members should not post, or link to, any materials that are disparaging, defamatory, harassing or indecent, and be accurate, fair, helpful and strategic when using social media.

15. COSCA members should not bring counselling and psychotherapy into disrepute when using social media. This means they should act responsibly and ethically, and should not misrepresent themselves or counselling and psychotherapy, or act in a discriminatory way.

16. If COSCA members find a negative post or comment online about them, they should not counter with another negative post. Instead, and if possible, they should publicly offer to remedy the situation through positive action.

17. COSCA members should protect themselves when using social media by not revealing data about themselves that could be used to impersonate them (e.g. date of birth, age etc.)

18. With a user's permission, Location Services allows apps and websites (including Maps, Camera, Weather, and other apps) to use information from cellular, Wi-Fi, Global Positioning System (GPS) networks, and Bluetooth to determine your approximate location. COSCA members should consider turning off location services that might identify their actual movements and geographical location at any particular time. COSCA members can still, however, include relevant postcodes etc. on their online profile for clients to use to identify the location of their counselling services.

19. The UK Safer Internet Centre promotes the safe and responsible use of technology for young people. It has a helpline to provide support to professionals working with children and young people with online safety issues.

<https://www.saferinternet.org.uk>

Brian Magee  
Chief Executive  
COSCA (Counselling & Psychotherapy in Scotland)