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ELECTRONIC COMMUNICATION POLICY (INCLUDING SOCIAL MEDIA, EMAIL, WEBSITE)

Introduction

This document reflects my current policies for how I participate and engage on my professional website and on social media accounts (e.g., Twitter). This document is divided into several parts:

- (i.) Verification of my Registration Status,
- (ii.) General information about my presence on the Internet,
- (iii.) Specific Information for former/current clients in my professional practice in Ontario (e.g., clients who are receiving psychological services, or registrants in professional development courses/workshops),
- (iv.) Electronic Payments,
- (v.) Statement regarding Viewing of Client's Virtual Presence, and
- (vi.) Receiving Complaints and Feedback.

Sources of information used to prepare this policy are credited at the end of this document.

This policy is reviewed annually. Clients in my professional practice in Ontario will be informed of any policy changes as they arise. If you have any feedback or questions about these policies, please contact me directly via email or through the contact form on my website.

Part A: Verification of My Registration Status

At any time, clients or members of the public can verify my registration status with the College of Psychologists of Ontario using the search tool (https://members.cpo.on.ca/public_register/new).

Part B: General Information about my Presence on the Internet

B1. Social Media

My Participation in Social Media

The purpose of my involvement on a social media account (e.g., Twitter) and/or other web tools (e.g., blogs) is to disseminate knowledge about psychology and mental health (care) with diverse audiences. All Canadian patients, policymakers, and health professionals are “stakeholders” in

the national health care system and our collective ability to access, use and nurture this system is reliant upon the knowledge we have available to us and the actions we take to care for ourselves and for the system. As such, the thematic content of my posts in social media accounts is to share the findings of health research, local/national/international health news, to communicate about issues that might affect public access to psychological and other health services, and to promote a general understanding of the theory and practice of psychology.

While efforts are made to ensure that the information provided on the social media sites is timely, accurate, and clear, neither websites or social media accounts should be considered the authoritative source of information with respect to a psychological perspective on mental health care. The discipline of psychology is always changing and evolving, and official positions or policy statements regarding its practices are communicated to the public through more traditional channels, such as official publications and media releases of the Canadian Psychological Association, the Ontario Psychological Association, and the College of Psychologists of Ontario.

My Availability on Social Media

Social media accounts (ie., Twitter) are updated and monitored on an ad-hoc and irregular basis. As such, these sites are not a reliable means to communicate with me regarding professional services. Members of the public who contact me via Twitter will receive a response that asks them to use more formal channels (telephone, email) in order to make contact.

Twitter Follows, Followers, and Lists

As part of my presence on social media, I will “follow” or “list” other social media accounts or sites (e.g., persons, agencies, businesses), and this activity does not imply endorsement. Links are made on the basis of their perceived usefulness to the public, and/or their perceived relevance to contemporary mental health issues or professional books/programs/services that I offer. Steps will be taken to remove or block “followers” when their activity is viewed as being in violation of the professional standards to which I adhere (see: *Twitter Commenting, Direct Messages, Replies and Repeats*, below).

Twitter Commenting, Direct Messages, Replies and Repeats (“Retweets”)

I welcome comments and questions about the content that I post in social media accounts, but unfortunately, I am not always able to reply individually to all messages that I receive. Any replies and direct messages that I receive are reviewed, and emerging themes or helpful suggestions may be discussed with other professional psychologists. Please feel free to contact the national (<http://www.cpa.ca/aboutcpa/contactus/>) or provincial (<http://psych.on.ca/Utilities/Contact-Us.aspx>) psychological associations to express your views directly.

I reserve the right to review and moderate comments on my social media account, where possible. Respectful differences of opinion are welcome. In situations where commentary has become

offensive, demeaning, harassing, threatening, or abusive, I will report these posts/activities to the social media account administrator and take steps to block or delete posts. Criteria used in the determination of whether a post is offensive, demeaning, harassing, threatening, or abusive is derived from my professional commitment to adhere to the Code of Ethics of Psychologists (<http://www.cpa.ca/aboutcpa/committees/ethics/codeofethics>), Standards of Professional Conduct for Psychologists (<http://www.cpo.on.ca/Resources.aspx?m=94>), and the Human Rights Code in Ontario (<http://www.ohrc.on.ca/en/ontario-human-rights-code>).

Occasionally, I will repeat (retweet) content from other users, which is undertaken for the purpose of sharing ideas and does not imply endorsement of products or services.

Links to Other Websites, Text, Images, Audio

As part of my presence on social media (Twitter), I post links to other content for the convenience of users. I cannot offer any guarantee or endorsement regarding the websites or their content. Such links are provided for informational purposes only. The content is not intended to be a substitute for professional medical or psychological advice, diagnosis, or treatment. Always seek the advice of your physician, psychiatrist, psychologist or other qualified mental health provider with any questions you may have regarding a medical or mental health condition. Never disregard professional advice or delay seeking it because of something you have read on this or any other social media channel or internet site.

Your Privacy on Twitter

Any information posted on a social media account or channel is “public” in that anyone can view it, as well as scan/record it. While information placed on the internet can be immediately deleted from view, some have argued that it cannot be ever completely removed from the Internet system. In addition, there may be personal or professional consequences associated with sharing of certain types of content (e.g., harassing others could lead to job loss) or private information (e.g., disclosing your social insurance number could lead to fraud; sharing your email address can increase spam activity). To protect your privacy, it is highly recommended that users of my social media account not share personal information with me, such as health conditions, names of health providers, social insurance numbers, addresses, telephone numbers, or photographs of identifiable individuals.

I do not store, use or disseminate information from my Twitter account. Members of the public who contact me for the purpose of professional services via Twitter will receive a response that asks them to use more formal channels (telephone, email) in order to make contact. Information provided in that more formal channel is used to contact the public member, as per their explicit request (e.g., for a consultation, info about a workshop or seminar, etc.)

Please note that all Twitter users are subject to its privacy policy.

Accessibility

Social media service providers may or may not be accessible for visitors with disabilities. Below are two links that may assist persons who have disabilities:

- an alternative interface to using Twitter websites (<http://www.easychirp.com/>).
- an accessible video player for better viewing of YouTube videos (<https://support.brightcove.com/en/video-cloud/docs/accessible-video-player-template>)

B2. Professional Internet Website

My Professional Website on Wix.com

The purpose of professional website is to provide members of the public with a means to identify me as a licensed mental health service provider in Ontario, and to promote an understanding of the psychological services that I offer in my practice. Information about how to contact me (e.g., locations, service hours), as well as my professional development course offerings for other mental health professionals, are listed. Efforts are made to ensure that the information provided on the site is timely, accurate, and clear.

My Availability on the Website

Members of the public or colleagues who wish to initiate contact with me regarding psychological services or course offerings can use the Website Contact Form. Information on the form is placed into an electronic message and delivered to my professional email account. To protect your privacy, please exercise caution about the information you choose to share with me via the Form (See: Privacy, below). My usual response time to Form-related requests for information and/or consultation is 1 to 2 business days. Please note that I am not able to provide professional advice over the phone or on the internet, and the Contact Form is not intended to be used as a means to provide mental health service.

Your Privacy on Wix.com

My web hosting platform (Wix.com) uses cookies to analyse trends, administer the website, track users' website movements and gather demographic information. Cookies are small pieces of data stored on a site visitor's browser to keep track of their movements and actions on a site. Cookies also enhance the user's experience by remembering your search preferences and thus allowing you to navigate the website more efficiently. You can learn more about cookies here: <https://support.wix.com/en/article/cookies-and-your-wix-site>. Wix also permits third-party tracking codes (i.e., Google Analytics) to enable website owners to monitor site traffic and track campaigns. Tracking codes allows for monitoring of the site's performance by seeing how visitors interact with the site. I do engage these analytical tools to monitor performance of the site. Note that aggregate data is examined - including the type of internet browser (e.g., Safari, Chrome, etc), duration of visit, pages visited, operating system (desktop, Android, etc.), and referral

sources (Yelp, google, etc) - to ensure that the website is optimized for visitors and to identify areas that require improvement. Individual users are not identified.

Please be aware that information sent via the Website Contact Form is collected by Wix, stored on their servers and forwarded to my e-mail account. It is not encrypted and therefore cannot be considered a secure or confidential transmission. I delete these messages promptly, and do not use the information for any purpose other than to arrange follow-up contact with you (if you have requested it) or to provide information you have asked for. To protect your privacy, please provide only as much information as is necessary to arrange an initial telephone consultation with me (e.g., use your first name or a false name). While I am able to delete the messages, I am unable to guarantee whether the information has been deleted from the Wix system.

Similarly, since email is not secure and I am not able to authenticate the identity of senders, email responses to inquiries are limited to administrative issues or information about services I offer and how best to access them. I do not discuss personal information or information about your mental health diagnosis/care/treatment over email.

Website-based Payments

Payments for registration at professional workshops are processed through my wix.com website for persons who choose this service. These payments are handled by a third-party provider (Paypal), whose website is secure and uses encrypted technology to process financial transactions. It is important to ensure you have a secure connection to the legitimate PayPal site - see this link for a discussion on the relevant issues: <https://www.thebalance.com/is-paypal-safe-315818>. Registrants of workshops are not required to use Paypal for payment - they may also choose to pay by mail or e-transfer (manual payment). (See *Part D: Electronic Payments*, below)

B3. Listing and/or Reviews of My Professional Work on Business Review Sites

The Internet has a wide range of Business Review Sites, including Google My Business, Yelp, Bing, etc. which typically list information about hours, locations, and provide web users the option to provide ratings and add reviews/testimonials. You may find that my professional practice is listed on these forums.

At this time, I maintain a listing on the following sites: Google My Business and Yelp, as part of my professional advertising. I am responsible for posting this content, including service hours, images, physical address, and office closures.

Business review sites also have a place where client reviews can be posted. Please note that I do not read, monitor or respond to content posted on these forums, nor do I engage with these sites or clients to solicit reviews or testimonials. (See *Interacting with Me*, below)

There may be other business review sites that have posted information about my professional services that I did not claim, confirm or validate. As such, these sites may contain information that is inaccurate or misleading. To ensure that you have the most accurate information about my professional services, please consult my professional website on Wix, or contact me directly by phone.

Part C: Specific Information for Former and Current Clients

Ethical and professional standards in Professional Psychology encourage Psychologists to make their relationships with clients/users as clear and unambiguous as possible. In addition, these standards also discern a standard of care when Psychologists are in communication with “direct users” of psychological services (i.e., “clients”) vs. “public users” (i.e., consumers of psychological information, members of the general public). This section of the document provides information about these two types of relationship, the risks of ambiguous relationships, and outlines my policies for how I interact with direct and public users (e.g., what former/current clients, former/current students and public users can expect of me on the Internet and in public forums).

C1. Terminology: Who is a Direct User (Client) and who is a Public User?

“Direct users” refer to persons who have currently (or in the past) received psychological assessment or intervention services (i.e., psychotherapy) in my professional practice in Ontario (e.g., also known as “clients”). “Direct users” also refer to registrants in courses that I teach, including courses at universities, professional development workshops and online professional development course offerings. These professional relationships are therapeutic or teaching/mentoring relationships.

“Public users” refers to a wide range of persons with whom I have contact in public forums, including audiences at talks I give in community settings, viewers of my social media account, and viewers of my professional website.

C2. The Role and Importance of Professional Boundaries in Protecting Client Welfare

Ethical guidelines and professional standards are explicit in acknowledging that the formation of social relationships between Psychologists and direct users (clients) can have unwanted or negative effects on direct users. One unwanted or negative effect can involve a “blurring of boundaries”, which creates confusion in clients about whether the activity/discussion is part of treatment or is part of the therapist’s own personal interests or goals. When boundaries are blurred in teaching/mentoring relationships, students may feel confusion around whether the activity/discussion is part of the educational curriculum or part of the teacher’s own personal interests or goals. Other unwanted or negative effects could include: the potential for information sharing that compromises your confidentiality and privacy, a negative impact on your progress in treatment, and confusion regarding my availability to respond to your concerns (e.g., using the social media account to arrange appointments).

The standards of professional practice are clear in stating that Psychologists are expected to remain mindful of this risk and to take steps to ensure boundaries are not blurred with past/present clients.

C3. Online Interactions Between Me and Direct Users

Social Media

As noted above, if I was to mutually engage with direct users on social media sites, we would be forming a social relationship outside of the boundaries of our therapeutic or professional work, which could have unwanted or negative effects on you.

Given the potential for harm, I do not accept “follow” requests from direct users of my professional services on Social Media sites. I have no reservations if direct users wish to follow my accounts on Twitter, but I am unable to reciprocate engagement in any way (direct messaging, likes, retweets, etc.). I have no expectations about whether you will seek to engage me on these sites.

I may not always be able to recognize former or current clients on social media sites due to the use of pseudonyms or “screen names”. If I begin to suspect that I have followed an account held by a current client on a social media site, I will raise this issue with you in session and terminate the social connection as I am not able to reciprocate the social connection. If you are a former client, the social connection will be terminated immediately online and without explanation.

If you are a direct user of my professional services, I ask that you do not make use of social media sites (Twitter) to contact me.

Email

Email is not a secure means of communication, and is stored in the logs of your computer and my computer by Internet Service providers (ISPs). It is possible that individuals in the ISPs or a person who hacked into your computer could read these emails. I am not able to provide any guarantee about the security and privacy of this information. Moreover, any information I receive via email becomes a part of your clinical health record. As such, I recommend to clients that only a minimum amount of information is provided in an email message, and that email communication, if used, is restricted to administrative issues only.

Part D: Electronic Payments

Payment using E-transfers

Information about how payments are received and processed is discussed at the time of an initial consultation or initiation of services. In some cases, clients prefer to pay for services using bank e-transfers. A mutually-agreed upon password is required to process these payments and we can make arrangements in person or via phone if you choose this method of payment. Given these passwords are used on a regular basis (e.g., during treatment), I will store this password in a secure location and use it only to accept e-transfers that you initiate. At no time will I contact you via email to collect or confirm personal financial information or e-commerce activity. Please inquire directly with your bank to learn more about its privacy policy regarding e-transfers of funds.

Payment using Third Party Sites

Payments for professional course offerings are accepted by E-Learning partner websites using secure e-commerce channels (e.g. Captus, ScholarsLab) and/or third party e-commerce websites (e.g., Paypal, Wix). These sites make use of secure encryption technologies to process payments. Please consult the privacy policies of the E-Learning partner and/or Paypal (<https://www.paypal.com/ca/webapps/mpp/ua/privacy-full>) to be fully informed about the privacy risks before choosing to use these services. If I am notified of a breach in security on an E-learning partner or third party e-commerce site, I will notify you immediately by phone.

Beware of Phishing Scams

To protect yourself against fraud, please be aware of phishing schemes (where criminals prompt you to provide usernames or passwords on fake log-in screens) and protect yourself by learning how to identify legitimate e-commerce sites.

Part E: Statement Re: Viewing/Accessing a Client's Virtual Presence

As a professional Psychologist, I respect your privacy. I do not view or search for your online social media profile. If you would like me to view part or all of your social media presence, bring your tablet/computer or print copies to our session for discussion and exploration.

Part F: Receiving Complaints/Feedback

If you are dissatisfied with the professional services that you have received, you have several options.

You have a right to express your dissatisfaction in any medium you wish, including online business review sites. Before doing so, however, I would ask that you give consideration to your privacy rights if you reveal personal and/or health information in a public forum. If you feel that

expressing yourself on a site is important, please consider using a pseudonym (false name) to write the review.

I prefer to receive positive and/or negative feedback directly from current or former clients. Since I do not monitor or review business review sites, it is unlikely that a client's feelings of satisfaction or dissatisfaction in a written business review will come to my attention. If our relationship is ongoing, it can be helpful to reveal your feelings to me in session, and it is my job to ensure that you feel safe in expressing these feelings. I will do what I can to assist. Also, I may be able to assist you in finding a Psychologist or therapist who is a better fit for your needs.

If you feel that you have suffered an emotional injury, or I have done something unethical, and you do not wish to discuss the situation with me, you can contact the College of Psychologists of Ontario to discuss your complaint. They will review the services that I have provided and make a determination about any consequences. They can be reached at:

110 Eglinton Avenue West, Suite 500
Toronto, Ontario
M4R 1A3
416-961-8817
www.cpo.on.ca

If you have any questions about this policy, please feel free to raise them with me when we meet in session or contact me directly via email/phone.

Credits/References:

This social media policy was prepared with the assistance of the following resource documents:

American Counselling Association. (2014). Code of Ethics. Retrieved from <http://www.counseling.org/docs/ethics/2014-aca-code-of-ethics.pdf?sfvrsn=4> on January 3, 2017.

Canadian Psychological Association (2001). Practice guidelines for providers of psychological services. Retrieved from <http://www.cpa.ca/cpaside/UserFiles/Documents/publications/Practice%20Guidelines2001%282%29.pdf> on January 3, 2017.

Canadian Psychological Association (2000). The Canadian Code of Ethics for Psychologists. Retrieved from <http://www.cpa.ca/aboutcpa/committees/ethics/codeofethics/> on January 3, 2017.

Evans, D.R. (2004). *The Law, Standards, and Ethics in the practice of psychology*. (2nd edition). Toronto, Canada: Emond Montgomery Publications Limited.

“Social Media: What’s your policy?.” Canada Business Network, Government of Canada, January 2, 2017, <http://canadabusiness.ca/blog/social-media-whats-your-policy-1/>.

The College of Psychologists of Ontario (March, 2009). Standards of Professional Conduct. Retrieved from <http://www.cpo.on.ca/Resources.aspx?m=94> on January 3, 2017.

Tunick, R.A., Mednick, L., & Conroy, C. (2011). A snapshot of child psychologists’ social media activity: Professional and ethical practice implications and recommendations. *Professional Psychology: Research and Practice*, 42(6), 440-447.