

Guidelines for Appropriate Use of the Internet, Electronic Networking and Other Media

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Scope

These Guidelines apply to all Faculty of Dentistry members (FOD members), including faculty, instructors, staff, students and those registered or participating in University of Toronto or Faculty of Dentistry educational activities and/or operations.

Internet, electronic networking and other media includes emails sent or received, email accounts, SMS/MMS messages, digital music, digital photographs, digital means and videos, social networks, file sharing accounts, other online accounts and similar digital items which currently exist or may exist as technology develops, regardless of the ownership of a physical device or digital item that is stored.

The use of the Internet, electronic networking and other media includes but is not limited to posting/commenting on blogs; direct messaging (DM), instant messaging (IM), private messaging (PM) on social networking sites; posting to public media sites, mailing lists and video sites; and emails.

These Guidelines are informed by but do not replace or limit the standards established by professional or regulatory bodies; by relevant clinical settings; or by other applicable University or Faculty standards, guidelines, policies, and procedures, including those referenced throughout this document and listed in Appendix A.

Preamble

The capacity to record, store and transmit information in electronic format brings specific responsibilities to those working in healthcare with respect to privacy of patient information and ensuring public trust in our clinics, institutions, and practices.

Significant educational benefits can be derived from this technology and learners need to be aware that there are also potential problems and liabilities associated with its use. Material that identifies patients, institutions or colleagues and is intentionally or unintentionally placed in the public domain may constitute a breach of law, or standards of professionalism and confidentiality that damages the profession and our institutions.

Guidance for FOD members about appropriate use of the Internet, electronic networking and other media is necessary to avoid problems while maintaining the University of Toronto's commitment to freedom of expression.

Various statements, policies, protocols, codes and standards apply to social media communications (see Appendix A). In particular, no member of the University should engage in hate speech or in

behaviour that demeans, harasses, or intimidates others; nor should any community member be subject to such language or behaviours. The University is committed to providing support to members of our community who are experiencing harassment or intimidation in social media spaces and to exploring intervention options via its policies and procedures or through its Community Safety Office, and/or municipal law enforcement where circumstances permit.

FOD members are reminded that they must meet multiple obligations in their capacity as members of the university community, as members of their profession and relevant professional regulatory bodies, and as employees of hospitals and other institutions. For all FOD members, these obligations extend to the use of the Internet, electronic networking and other media at any time - whether in a private or public forum.

General Guidelines for Safe Use of the Internet, Electronic Networking and Other Media

These Guidelines are based on several foundational principles, as follows:

- The importance of privacy and confidentiality to the development of trust between health care practitioner and patient.
- Respect for colleagues and co-workers in an interprofessional environment.
- The importance of ensuring the tone and content of electronic conversations remain professional.
- Individuals are personally responsible for the content published on or disseminated using the Internet, electronic networking or other media.
- The assumption that material published on or disseminated using the internet, electronic networking or other media is permanent. Information posted online, may remain accessible even if content is removed, it can still be archived, shared or accessed by others.
- All involved in health care have a responsible for safeguarding patient health information in all forms as outlined in the University Health Privacy Policy, the University Health Information Security Policy, and Ontario's Personal Health Information and Protection Act (PHIPA). This includes safeguarding patient health information in both paper and electronic form, and in all communications and conversations that contain or might disclose Personal Health Information or Personal Information.
- FOD may periodically review online conduct to ensure adherence to these guidelines. Violations may result in disciplinary actions, which could range from informal counseling to more formal sanctions as outline in the University of Toronto's Code of Student Conduct and other relevant policies.

1. Professional Behaviour

All FOD members will engage in behaviour that displays and reflects truth, honesty, representation in, on and around electronic platforms and/or devices. FOD members are to engage only in online activities that are respectful and exemplify professional behaviour. The manner and content of all

communications should be professional and FOD members should recognize that their activities may have lasting impacts on their reputations with patients, colleagues, and the general public.

With respect to dentists, dentists are bound by ethical and professional obligations that extend beyond their clinics or offices. When online, one must follow the same rules of professional conduct that are followed at work.

Any uploaded content to internet must not hurt the public confidence in the dental profession, U of T, FOD or compromise one's own professionalism. Inappropriate use of the Internet, electronic networking or other media may breach University of Toronto codes of behaviour, including the Code of Student Conduct, Policy on Sexual Violence and Sexual Harassment, Statement on Prohibited Discrimination and Discriminatory Harassment, Standards of Professional Practice Behaviour for all Health Professional Students, and any policies referenced in Appendix A. Inappropriate use of the Internet, electronic networking or other media may also breach standards established by professional or regulatory bodies.

When a FOD member indicates they belong to the Faculty of Dentistry in their social media profile, anything posted on their social media platform may be perceived that they are representing FOD or UofT. FOD members should not participate in industry marketing, sales or sponsorship programs with industry, including via the internet, electronic networking and other media. This includes sponsorship on any social media platform associated with the Faculty.

FOD members must adhere to the University of Toronto Trademark Licensing Policy. The University of Toronto Trademark Licensing program oversees and enforces any and all trademarks of The University of Toronto. This includes, but is not limited to, the principal signature, all departmental marks, word marks, letter marks and athletic branding for all 3 campuses

2. Posting Information about Patients

Standards of patient privacy and confidentiality must be maintained in all situations, including online. Never post personal health information about an individual patient.

Personal health information (PHI) is defined in the Personal Health Information Protection Act (PHIPA) as any information about an individual in oral or recorded form, where the information "identifies an individual or for which it is reasonably foreseeable in the circumstances that it could be utilized, either alone or with other information, to identify an individual".

These guidelines apply even if the individual patient is the only person who may be able to identify themselves on the basis of the posted description. FOD members should ensure that anonymized descriptions do not contain information that will enable any person, including people who have access to other sources of information about a patient, to identify the individuals described.

All FOD members must always and only keep PHI or Personal Information on PHIPA-compliant systems and resources as instructed by managers, Director of Clinic, and/or the Privacy Officer, and not copy, save, or keep them on other resources or devices, such as personal devices or accounts, or other University systems that have not been assessed to be PHIPA-compliant and provisioned or provided to FOD members for this purpose.

Exceptions that would be considered appropriate use of the Internet, electronic networking and other media:

It is appropriate to post information about patients:

1. With the express documented consent of the patient or substitute decision-maker.
2. Within secure internal FOD or teaching networks if expressly approved by the FOD
3. Within specific secure course-based environments provided by the University of Toronto that are password protected or have otherwise been made secure. Even within these course-based environments, participants should:
 - a. adopt practices to "anonymise" individuals; This may include data masking by blurring identifiable features, pseudonymization by replacing a patient's name with a pseudonym, or generalization where a geographic region rather than the patient's address is included.
 - b. ensure there are no patient identifiers associated with presentation materials. In text, this may include names, addresses, and/or phone numbers. In image or video, this may include the patient's face, a defining characteristic such as a tattoo or background detail; and
 - c. use objective rather than subjective language to describe patient behaviour. For these purposes, all events involving an individual patient should be described as objectively as possible, i.e., describe a hostile person by simply stating the facts, such as what the person said or did and surrounding circumstances or response of staff, without using derogatory or judgmental language.
4. When using entirely fictionalized accounts that are so labelled.

3. Professional Communication With and Posting Information About Colleagues, Supervisors, and Co-Workers

Respect for classmates, colleagues, supervisors, and co-workers, including their privacy rights, is important in an interprofessional working environment. Addressing classmates, colleagues and co-workers in a manner that is insulting, abusive or demeaning is unprofessional behaviour. Making demeaning or insulting comments about classmates, colleagues and co-workers to third parties, including via the Internet, electronic networking and other media, is also unprofessional behaviour. If you are in doubt about whether it is appropriate to post any information whether in text, image, or video about classmates, colleagues and co-workers, ask for their explicit permission including the content and platform of posting - preferably in writing.

Insulting, abusive or demeaning comments and communication may breach University of Toronto codes of behaviour and/or standards established by professional or regulatory bodies, including those referenced in Appendix A.

4. Posting Information Concerning other Institutions

FOD members should comply with hospital or institutional policies regarding the use of technology as well as the use of any proprietary information such as logos (wordmark) or mastheads.

Learners must not represent or imply that they are expressing the opinion of the organization. Be aware of the need for a hospital as well as the University of Toronto to maintain the public trust. Consult with the appropriate resources such as the relevant communications or public relations office at the hospital or Faculty of Dentistry.

5. Offering Clinical Advice

Do not misrepresent or mislead as to your qualifications or role. Provision of clinical advice is governed by the Royal College of Dental Surgeons of Ontario (RCDSO) and based on the type of certificate of registration (Licence). Undergraduate dental students are not eligible for any type of certificate of registration. Any patient interaction and management from undergraduate dental students are supervised by instructors with a valid certificate of registration. Graduate dental students also must operate and are governed by the type of certificate of registration.

6. Academic Integrity Extends to the Appropriate Use of the Internet, Electronic Networking and Other Media

The University of Toronto's Code of Behaviour on Academic Matters articulates offences that are considered a breach of academic integrity; these offenses may occur in-person or online. These offences include plagiarism and forms of cheating such as sharing examination questions or collaborating on work where specifically instructed not to do so.

7. Posting Personal Opinions

FOD members should be cautious when posting whether in text, image, or video formats as not to present personal opinions that may be falsely perceived as endorsed by the University of Toronto.

FOD members may consider including a disclaimer that the opinions expressed are personal and do not necessarily represent the opinions of other faculty, instructors, staff, students, or the University as a whole.

If the FOD members do receive sponsorship through their social media platform, a disclaimer must be used to avoid the perception that FOD or UofT is the recipient of the sponsorship.

When using a disclaimer:

- Make it clear that you are speaking for yourself and not for UofT or FOD.
- Write in the first person.
- When commenting through a blog or online discussion forum, emphasize that you are communicating as an individual participant – do not identify yourself as a member of UofT or FOD.
- For the “about me” section of your blog, website, or social networking profile, considering adding this language, for example: “The views expressed on this blog/website/profile are my own and do not reflect the views of my professional association or education institution.

Consider separating personal and professional content online line. Online “privacy” is never absolute. Professionalism should extend into one’s private accounts. Posting material that demonstrates, or appears to demonstrate, behaviour that might be considered unprofessional, inappropriate or unethical should always be avoided. Do not make gratuitous, unsubstantiated or unsustainable negative comments about individuals, groups, or organizations, especially any comment that might be seen as showing hatred to racialized people, people with disabilities or negative comments about socio-economic status. Online profanity, disparaging or discriminatory remarks is unacceptable. Posting or resending images or jokes that could cause offence should always be avoided.

One of the realities of operating within the online/social space is that you will be engaged in public interaction with patients and the general public through comments on review platforms (e.g., Google reviews), posts, forums or message boards.

A few things to keep in mind when engaging with comments:

1. Evaluate the sincerity or validity of comments, especially when they are negative. Not all comments need to be engaged with.
2. If confronted with a legitimate criticism or negative comment, be sure to address it quickly, but take your time to craft an appropriate response. Never reference a specific person or incident and always protect the patient’s privacy.
3. Don’t get pulled into arguments in the comments. Whether it’s in a post or an online review, do not engage in exchanges in a public setting that can potentially get out of control. Instead, respond with general statements such as, “Our office works hard to make sure you have a great patient experience. Please call our office to discuss.”
4. Respond to comments where they have been posted (e.g., Facebook, Instagram, Google), but try to move the conversation away from the public space. Encourage the commenter to email you instead and continue the conversation offline in a more private exchange.
5. Legal action should be a last resort. This is generally not recommended – such cases are difficult to win, can be emotionally and financially challenging, and could lead to more negative publicity.

6. Do not encourage or ask patients and/or staff to post positive messages to boost your ratings. Be sure to adhere to the advertising guidelines of the Royal College of Dental Surgeons of Ontario.

Appendix A - Associated Statements, Policies, Protocols, Codes and Standards

University of Toronto

1. Appropriate Use of Information and Communication Technology. [Information and Communication Technology, Appropriate Use of – Division of the Vice-President & Provost \(utoronto.ca\)](#)
2. Code of Student Conduct. [Code of Student Conduct \[December 13, 2019\] | The Office of the Governing Council, Secretariat \(utoronto.ca\)](#)
3. Standards of Professional Practice Behaviour for all Health Professional Students. [Professional Practice Behaviour for all Health Professional Students, Standards of \[March 31, 2015\] | The Office of the Governing Council, Secretariat \(utoronto.ca\)](#)
4. Statement on Prohibited Discrimination and Discriminatory Harassment. [Workplace Harassment, Policy with Respect to \[February 1, 2024\] | The Office of the Governing Council, Secretariat \(utoronto.ca\)](#)
5. Policy on Sexual Violence and Sexual Harassment. [Sexual Violence and Sexual Harassment, Policy on \[January 1, 2023\] | The Office of the Governing Council, Secretariat \(utoronto.ca\)](#)
6. Protocol with Health Care Institutions: Sexual Violence and Sexual Harassment Complaints involving Faculty Members and Students of the University of Toronto arising Independent Research Institutions, Health Care Institutions and Teaching Agencies. [Sexual Violence and Sexual Harassment Complaints involving Faculty Members and Students of the University of Toronto arising in Independent Research Institutions, Health Care Institutions and Teaching Agencies | Temerty Faculty of Medicine](#)
7. Code of Behaviour on Academic Matters. [Code of Behaviour on Academic Matters \[July 1, 2019\] | The Office of the Governing Council, Secretariat \(utoronto.ca\)](#)

Please note that all University policies may be amended from time to time. The full and current list of policies & guidelines can always be found at the following links:

University of Toronto Policies and Guidelines for all employees:

[Policies and Guidelines – The Division of People Strategy, Equity & Culture \(utoronto.ca\)](#)

University of Toronto Policies and Guidelines for Faculty and Librarians:

[Policies & Guidelines – Office of the Vice-Provost, Faculty & Academic Life \(utoronto.ca\)](#)

Social Media Resources and Supports for Faculty Members and Librarians

[Social Media Resources and Supports for Faculty Members and Librarians – Division of the Vice-President & Provost \(utoronto.ca\)](#)

Royal College of Dental Surgeons of Ontario

- Professional Use of Social Media

Ontario Dental Association

- Guidelines for Communicating through Social Media

Government of Ontario

- Ontario Human Rights Code
- Personal Health Information Protection Act
- Information and Privacy Commissioner of Ontario