



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - revised *Guidelines for advertising regulated health services*

National Boards and the Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the revised *Guidelines for advertising regulated health services*.

This response template is an alternative to providing your response through the online platform available on the consultation [website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the revised guidelines. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name (if provided) of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

Submitting your response

Please send your response to: AHPRA.consultation@ahpra.gov.au

Please use the subject line: Feedback on guidelines for advertising regulated health services

Responses are due by: **26 November 2019**

General information about your response

Are you responding on behalf of an organisation?	
Yes	What is the name of your organisation? Pharmacy Council of NSW
No	Are you a registered health practitioner? Yes/No If yes, which profession(s)? Are you a student? Yes/No If yes, which profession?
We may need to contact you about your response. Please write your name and contact details below. (Skip if you wish to remain anonymous)	
Name (optional)	████████████████████
Contact details (optional)	██

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised Guidelines for advertising regulated health services.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

1. How clear are the revised guidelines?
The language is generally clear and easy to follow. Some comments are added for consideration – see question 3 below
2. How relevant is the content of the revised guidelines?
They are relevant to practitioners looking for guidance on interpreting section 133.
3. Please describe any content that needs to be changed or deleted in the revised guidelines.
The following suggestions are offered for consideration: Pg 5. Summary of advertising obligations. 1. “Any terms or conditions Suggest change to “All terms and conditions”. Pg 7. 3.2 Who is an advertiser? Possibly consider adding ‘public endorsements or testimonials’ to the list and then reference the relevant sections. Pg 12, 3rd para. Suggest to include full or all terms and conditions” Pg 12, 4.3.2 Are patient reviews permitted in <i>advertisng</i> (spelling - advertising) Suggest change the word “fora” to “forums” on the 2 nd last line. The plural fora (as in the original Latin) is chiefly used when talking about a public square in an ancient Roman city.
4. Should some of the content be moved out of the revised guidelines to be published in the advertising resources section of the AHPRA website instead? If yes, please describe what should be moved and your reasons why.
No
5. How helpful is the structure of the revised guidelines?
The structure is clear.

<p>6. Are the flow charts and diagrams helpful?</p> <p>Please explain your answer.</p>
<p>The flow charts are easy to follow.</p>
<p>7. Is there anything that needs to be added to the revised guidelines?</p>
<p>No</p>
<p>8. It is proposed that the guidelines will be reviewed every five years, or earlier if required. Is this reasonable?</p> <p>Please explain your answer.</p>
<p>5 years is reasonable, or earlier review as required.</p>
<p>9. Please describe anything else the National Boards should consider in the review of the guidelines.</p>
<p>N/A</p>
<p>10. Please add any other comments or suggestions for the revised guidelines.</p>
<p>Page 17 – definitions</p> <p>Suggested amendment for the definition of Product:</p> <p>Product: Therapeutic goods as defined by the Therapeutic Goods Act 1989 (Cth). Does not apply to the advertising of other products that are not associated with the provision of regulated health services. (p. 17)</p>

Thank you!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the Guidelines for advertising regulated health services.