



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? Occupational Therapy Australia
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 revised guidelines are clear. No further comments.
2. How relevant is the content of the revised guidelines?
The content is relevant. No further comments.
3. Please describe any content that needs to be changed or deleted in the revised guidelines.
No changes advised.

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 parts of the content should be moved out of the revised guidelines for publication on the advertising resources section of the AHPRA website.

5. How helpful is the structure of the revised guidelines?

The revised guidelines are presented in a clear and helpful structure.

6. Are the flow charts and diagrams helpful?

Please explain your answer.

Yes, the flow charts and diagrams are helpful. These provide practitioners with coherent tools that aid comprehension and decision making.

7. Is there anything that needs to be added to the revised guidelines?

Nothing in the guidelines, but overall there is a lot of information on advertising on the website, and whilst these are all good resources, there is a lot of information for practitioners to understand and digest. Members frequently phone us at OTA to help them just navigate their way through this information. An overall navigation tool might be helpful for practitioners. For instance, this could take the form of an overall flowchart or hierarchy document which shows how all the resources (guidelines and web-based resources) work together.

8. It is proposed that the guidelines will be reviewed every five years, or earlier if required.

Is this reasonable?

Please explain your answer.

Yes, this is a reasonable timeframe.

A shorter timeframe is not necessary given that the Guidelines specify that the National Boards can opt to review the guidelines earlier in response to emerging issues or evidence that could impact the guidelines' continued relevance and workability.

9. Please describe anything else the National Boards should consider in the review of the guidelines.

Occupational Therapy Australia receives many enquiries from occupational therapists about testimonials (Item 5c of the Discussion paper). Whilst Occupational Therapy Australia would not want these to be false or misleading, it would be preferable if there was some room for a middle ground on the use of testimonials.

Many occupational therapists would like to be able to use case studies and examples of their practice, with client permission, to illustrate their services.

Testimonials are particularly relevant to occupational therapists as their practice is broad and covers a diverse range of areas. Examples and case studies could assist occupational therapists illustrate their areas of expertise, and could also allow consumers to be better informed of the range of services offered by occupational therapists.

Occupational Therapy Australia supports measures that allow consumers to better understand services available that can enhance their health and wellbeing.

Occupational Therapy Australia has also received feedback from members who advise they feel the inability to use testimonials is reducing their competitiveness in a health market that is increasingly focused on consumer choice. Occupational Therapy Australia has also received feedback from consumers who inform the association that they find such testimonials helpful.

A final consideration is that it is becoming increasingly difficult for therapists to monitor testimonials on third party websites.

10. Please add any other comments or suggestions for the revised guidelines.

No further comments.

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.