



26 November 2019

Mr. Martin Fletcher  
Chief Executive Officer  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
Melbourne VIC 3001

Email: [AHPRA.consultation@ahpra.gov.au](mailto:AHPRA.consultation@ahpra.gov.au)

Dear Mr. Fletcher,

**RE: Consultation on the review of the *Guidelines for advertising a regulated health service***

Thank you for the opportunity to provide a submission to this Australian Health Practitioner Regulation Agency (AHPRA) consultation on the *Guidelines for advertising regulated health services*.

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 275,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe, evidence-based, best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

The ANMF supports AHPRA's proposed Option 2 which involves the National Boards approving and publishing revised guidelines. Given the increasing use of social media and the changing landscape of advertising, the ANMF consider that a three rather than five year schedule of review would be appropriate.

Proposed changes

The draft guidelines are clear and the content broadly relevant to health practitioners. The structure, flow chart and diagrams are helpful. The ANMF is pleased overall with the reviewed guidelines as they stand, particularly the use of examples to illustrate how specific guidelines apply to individual cases. We note,



however, that none of these examples describe the services provided by nurses or midwives, which we believe is a regrettable oversight.

While the majority of midwives in Australia work within health facilities, some work in independent practice, as do some nurse practitioners, and may therefore utilise advertising. In addition, the services of nurses working in general practice or cosmetic clinics may be specifically advertised by their employer.

The ANMF therefore requests the inclusion of a midwifery example and at least one nursing example to illustrate both the types of work, and claims relating to that work, allowable under the guidelines. We are happy to collaborate or consult with AHPRA if that would be beneficial, or alternatively are able to provide examples consistent with those given in the draft guidelines for other professions.

The proposed revised guidelines will be an important resource for nurses and midwives, employed or self-employed, in private practice. Once these guidelines have been finalised, a comprehensive communication strategy should be implemented to ensure nurses and midwives are aware of their regulatory obligations. The ANMF is well positioned to assist AHPRA with the dissemination of information in relation to these new guidelines through our many publications, social media and face to face contact with our nurse and midwife members across the country.

We appreciate the opportunity to participate in this consultation process and provide our feedback on behalf of our membership. Should you require further information on this matter, please contact [REDACTED]

Yours sincerely

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[REDACTED]