

Social Media Consultation
The Boards
Australian Health Practitioner Regulation Agency
By Email: guidelinesconsultation@ahpra.gov.au

May 30, 2013

Submission: **Public Consultation**

Thank you for the opportunity of providing a submission for consideration about the proposed changes to the Guidelines for Advertising and the Social Media Policy.

Overall I thought the three documents (Guidelines For Advertising, Social Media Policy and Revised Code of Conduct) did a good job at explaining the need for registered health practitioners to advertise their services with professionalism and within the requirements of the law. It was good to read these three documents together and to note how they interrelate. It's helpful that practitioners are aware that often a single policy or guideline alone doesn't provide all the information required to make a decision on their advertising.

Guidelines for Advertising

The existing Guidelines for Advertising is flawed in a number of ways: it is a dense, poorly set out document that can be confusing. The proposed changes will improve the clarity and usefulness of this document.

Each of the six appendices are well-structured and helpful, most particularly the 'Links to Associated Legislation and Agencies' included in Appendix 2.

Within the appendix, on page 22 of the 76 page review document, there is a large blank space, jumping from the definition of AHPRA to that of Health Practitioner. Are there any definitions missing from this section, or was it just a space and can it be removed from the final iteration of the document?

It may be helpful for the new document to place a greater emphasis on what does and doesn't fall under the "Definition of Advertising": it has been proposed that this list be placed in the Appendix under 'definitions', where the list is currently right at the front of the document.

The new-look dot point list of the various forms of advertising is a vast improvement to the previous dense paragraph. It might be a good idea to specifically add some of the well-established Advertising mediums (for example, mentioning 'pay per click advertising' or 'Google Adwords') since specifics often jog memories better than broad terms like 'internet'.

In the absence of providing specific examples of what types of advertising may be considered compliant and not compliant with the guidelines (more about this shortly), the presence of Section 5, 'The basis for these guidelines', and the 'helpful questions' in section 8 provide a useful litmus test for readers to evaluate their advertising. The inclusion of 'common meanings' of some of the terms strikes me as being more helpful than the lack of definition in the current iteration.

Whilst I understand that it is not AHPRA's or the National Boards' role to provide legal advice, and acknowledging that it is impossible to provide examples of everything relevant, I would suggest that the inclusion of specific examples of compliant and non-compliant advertising would be very helpful to many practitioners.

Regarding online advertising, it is important that practitioners are made aware that some online marketing activities done on their behalf may not be on their radar, and that they should check EVERY aspect of the marketing done on their behalf. This includes any type of content created by people who are not Australian nor dentists/dental professionals, such as articles intended for broad distribution, comments that are placed on blogs or in online forums, or images and videos intended to improve the visibility of a practice's website.

This type of activity is commonly done under the broad definition of “SEO” (Search Engine Optimisation:) and such services are often sold as a ‘black box’ (“You don’t need to know exactly what we’re doing: what’s important is that our activities improve your website’s rankings”.) Some of what is currently done under the guise of SEO is absolutely not-compliant with the Advertising Guidelines and Law.

Proposed Social Media Policy

This short document contains a useful definition of what Social Media is and may be. Pinterest is another of the ‘big guns’ of Social Media, and might be worth mentioning in the first iteration of the document.


The section on obligations is very helpful and reminds practitioners that there are several documents that must be consulted when making decisions about their Social Media.

Summary

Overall I think these documents will be a vast improvement on what currently exists.

The creation of an additional document, giving specific examples of advertising that is likely to be compliant, likely not to be compliant and why, would be the icing on the cake.

Kind regards,

A handwritten signature in black ink that reads "Jacki". The signature is written in a cursive, slightly slanted style.

Jacki Kearslake BDS | Dental Web Strategies