Submission

 April 2013

Consultation on common guidelines and *Code of conduct*

**Public consultation**

The 14 National Boards in the National Registration and Accreditation Scheme (the National Scheme) are releasing this paper for public consultation. The consultation paper (attached) proposes:

• revisions to the *Guidelines for advertising* (common to all National Boards)

• a *Social media policy* (common to all National Boards), and

• revisions to the *Guidelines for mandatory notifications* (common to all National Boards).

Most Boards are also consulting on a revised *Code of conduct* (either the code shared by most National Boards, or for some Boards there is a profession-specific code). (Boards which are not consulting on their code as part of this consultation are the Medical Board of Australia and Nursing and Midwifery Board of Australia.)

**Please provide feedback by email to** **guidelinesconsultation@ahpra.gov.au** **by close of business on 30 May 2013.**

Name of person or organisation making the submission:

Chinese Medicine Council of New South Wales

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Guidelines for advertising

How are the existing guidelines working?

The guidelines appear comprehensive and address all concerns.

Is the content of the revised guidelines helpful, clear and relevant?

The guidelines do provide helpful, clear and relevant information. The revised guidelines do address the current Australian advertising environment.

Is there any content that needs to be changed, deleted or added in the revised guidelines?

No

Is there anything missing that should be added to the revised guidelines?

It is not clear whether a registered practitioner in one division only (eg acupuncture) can use the term Chinese medicine in brackets after their name eg Dr XX (acupuncture) or Dr XX (Chinese herbal medicine practitioner) or Dr XX (Chinese medicine). It may mislead the public if the practitioner is only registered in one division only.

It is not clear that when a registered health practitioner who also has a Doctoral degree can use the term in brackets (PhD) rather than (Chinese medicine)

Do you have any other comments on the revised guidelines?

No.

Code of conduct

How is the current code working?

The guidelines appear comprehensive and address all concerns. The additions and deletions improve and clarify the document.

Is the content of the revised code helpful, clear and relevant?

The guidelines do provide helpful, clear and relevant information. The revised guidelines do address the current Australian advertising environment.

Is there any content that needs to be changed, added or deleted in the revised code?

No

Do you have any other comments on the revised code?

No.

Social media policy

Do you support the approach of including general guidance in the draft policy, the *Guidelines for advertising* and the *Code of conduct*, with appropriate cross-referencing?

Yes.

Does the guidance in these documents reflect the National Boards’ regulatory role?

Yes, the guidelines reflect the regulatory roles.

Do you agree with the approach of referring practitioners to other sources for guidance on social media that goes beyond the National Boards’ regulatory role?

Yes referring to other regulators such as the Australian Competition and Consumer Commission and the Therapeutic Goods Administration and their associated documents is appropriate.

Is the content of the draft *Social media policy* helpful?

Yes

Is there any content that needs to be changed, added or deleted in the draft policy?

No.

Do you have any other comments on the draft policy?

No.

Guidelines for mandatory notifications

How are the current guidelines working?

The guidelines appear comprehensive and address all concerns. The additions improve and clarify the document.

Is the content of the revised guidelines helpful, clear and relevant?

Yes.

Is there any content that needs to be changed, deleted or added in the revised guidelines?

No

Is there anything missing that needs to be added to the guidelines?

It is not clear what “under the influence of alcohol or drugs” means. For example is there a level of blood alcohol that constitutes being under the influence or is zero tolerance or is the concept based on behavior rather than an objective measure?

Do you have any other comments on the guidelines?

No.

General

Do you have any comments on the presentation or wording of the consultation documentation, including ways in which the documentation could be improved for public consultation?

It may be helpful in the Summary of changes to Guidelines for advertising of regulated health services, under the heading “Change” in some sections to list page numbers which would make the information easier to be found.

*Thank you for participating in the consultation process*