



Aboriginal and Torres Strait  
Islander health practice  
Chinese medicine  
Chiropractic  
Dental  
Medical  
Medical radiation practice  
Nursing and Midwifery  
Occupational therapy  
Optometry  
Osteopathy  
Paramedicine  
Pharmacy  
Physiotherapy  
Podiatry  
Psychology

## Australian Health Practitioner Regulation Agency

Q13.

### **Guidelines for advertising regulated health services: public consultation**

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

**Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised guidelines.**

Q23.

### **Privacy**

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

#### **Privacy notice**

This consultation is being conducted by AHPRA and is hosted on a third-party website, provided by Qualtrics. The information collected will be used by AHPRA to evaluate the revised guidelines. The information will be handled in accordance with the privacy policies of AHPRA accessible [here](#) and Qualtrics [here](#).

Q25.

### **Publication of responses**

National Boards and AHPRA publish responses at their discretion. We generally publish responses on our websites to encourage discussion and inform the community and stakeholders.

We will not publish responses that contain offensive or defamatory comments or which are outside the scope of the consultation. Before publication, we may remove personally-identifying information, including contact details.

We can accept responses made in confidence. These responses will not be published. Responses may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential response will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions to protect personal information and information given in confidence.

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

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

Q25.

## Contact details

We may contact you about your response.

Please write your name and contact details.

**(Skip if you wish to be anonymous)**

Dr John-Paul Bossi [REDACTED]

## Q24. Publication of responses

Please select the box below if you do **not** want your response to be published.

Please do **not** publish my response

## Q15. About your response

Q23. Are you responding on behalf of an organisation?

Yes

No

Q24. Which of the following best describes your organisation?

*This question was not displayed to the respondent.*

Q22. Please write the name of your organisation

*This question was not displayed to the respondent.*

Q17.

Which of the following best describes you?

- I am a health practitioner
- I am a member of the community
- I am an employer (of health practitioners)
- I am a student
- Other

Q19.

Which of the following health profession/s are you registered in, in Australia?

You may select more than one answer

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

Q8.

## Before you answer questions about the guidelines

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.

The following questions will help us to gather feedback about the revised guidelines.

Q9.

How clear are the revised guidelines?

not very, they require cross referencing with existing guidelines, which are not necessarily clear in and of themselves

Q10.

How relevant is the content of the revised guidelines?

it tackles some of the issues (eg minimising risk associated with certain procedures) but doesn't address issues that fall outside of APHRA's constituents eg dentists are limited by what they can claim in an advert yet companies working outside of registered practitioners like [REDACTED] or [REDACTED] can do whatever they want.

Q12.

Please describe any content that needs to be changed or deleted in the revised guidelines.

the opening part that "A person must not advertise a regulated health service, or a business that provides a regulated health service, in a way that—..." needs to encompass provisions that allow APHRA to regulate those companies that work outside of registered dental practice (eg clear aligner providers or tooth whitening services) especially online services that bypass practitioner oversight.

Q27.

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?

Yes

No

Q29.

If yes, please describe what should be moved and your reasons why.

all of it - in plain english with examples

Q22.

How helpful is the structure of the revised guidelines?

somewhat, it is a bit clunky to work around. examples and plain english (shorter sentences) are most helpful

Q32. Are the flow charts and diagrams helpful?

Yes

No

Q34.

Please explain your answer.

we often think schematically, so having a binary type flow chart (yes/no, either/or) should assist with decision making on advertising

Q16.

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

regulate the unregulated business sectors invading registered practices

Q38. It is proposed that the guidelines will be reviewed every five years, or earlier if required.

Is this reasonable?

Yes

No

Q40.

Please explain your answer.

the world of online advertising is changing constantly, with rapid onset of monopolies (eg [REDACTED]) the freedom for a patient to choose his/her dental health carer should not be dictated by corporate online gatekeepers. Regulating practitioners alone is a blinkered approach; there are too many corporates that are disrupting and taking over dental practice that work outside of the regulatory framework, and none are being pulled up for their wrongdoings (eg [REDACTED] mailing my patients directly to suggest that the service they just had performed by me may be done cheaper if they go to one of their [REDACTED] corporate clinics instead.....this is a misuse of market monopoly, and often to the detriment of established doctor-patient relationship, but no one is reining these corporates in)

Q24.

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

Target the misuse of advertising by corporate dental disruptors. the rules we practitioners abide by are onerous, but fair. It appears that corporate giants can do whatever they want outside of the regulations, and not be brought to task.

Q36.

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

enact punitive measure sto corporate players in dentistry that flout the advertising guidelines, or adopt unethical approaches to patient dental care

Q27.

**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*.