



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](mailto: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?	
<b>Yes</b>	What is the name of your organisation? <b>Australian Chiropractors Association</b>
<b>No</b>	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. <b>(Skip if you wish to remain anonymous)</b>	
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.

<b>1. How clear are the revised guidelines?</b>
<p>The revised guidelines present as a much clearer document with logical content flow and easily identifiable sections and content.</p> <p>The one-page summary at the start of the document is excellent and could act as a good quick access resource for practitioners to refer to.</p>
<b>2. How relevant is the content of the revised guidelines?</b>
<p>All content in the revised guidelines is relevant and appropriate for the document and the documents primary purpose.</p>
<b>3. Please describe any content that needs to be changed or deleted in the revised guidelines.</b>
<p>Page 11 – Position titles in employment contexts – this information is unclear. Can a common example be provided to provide context / relevance / clarification?</p>

**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. However the summary page may be useful to have as a stand-alone pdf in the resources section of the website.

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

The structure is easier to read and good clarifications have been made in many areas that have raised practitioner questions previously, including the use of images and photography and the responsibility for prohibited testimonials.

**6. Are the flow charts and diagrams helpful?**

**Please explain your answer.**

The flow charts and diagrams (Figure 1 and 2) are very basic in nature and don't necessarily add anything to the content or decision-making process regarding the appropriateness of content and determination of breaches of advertising guidelines.

On a positive note, they do serve to visually break up the large slabs of text and may act as a revision tool.

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

**Page 12 Testimonials**

A common question from practitioners is whether the "publication" of a case study would constitute a testimonial.

The CBA published an FAQ in December 2015 which dealt with '[Evidence-based practice](#)'.

On page two the CBA states:

*"Evidence based on clinical experience and/or case studies is not considered valid or reliable as it is based on a small sample size and is subject to practitioner and patient bias as it is not blinded or randomised."*

*"Evidence is rated from most reliable to least reliable. The National Health and Medical Research Council (NHMRC) in Australia uses a scale from Level I being most reliable to Level IV being least reliable."*

*Level IV Evidence consists of case series with either post-test or pre-test outcomes and includes case studies of single or small numbers of subjects."*

In order to keep frequently asked clarifications, such as this, within one central document, suggest including some clarification in guidelines regarding this.

**Page 13 – Compliance responsibility table**

Suggest offering examples in reviews appearing on column for boxes 1, 4 and 5

**Figure 2, page 14** – suggest starting with another box:

**Do You have editorial control over the review platform?** – Yes – progress to next square, No – not in breach

Also suggest underneath Figure 2 adding a sentence about a more detailed self-assessment tool is available on the AHPRA website and providing link –

<https://www.ahpra.gov.au/Publications/Advertising-resources/Check-and-correct/Self-assessment-tool.aspx>

**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 could be considered standard review timing.

It is suggested that exceptions would include major changes to National Law or changes to external legislation that would require the updating of health professionals advertising guidelines to ensure compliance.

An earlier partial review could be considered if there are a significant number of notifications are received in relation to a particular aspect of the national law.

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

The National Boards could consider content delivery. All individuals learn and understand in different ways. Exploring the provision of guidelines or highlighting an executive summary in different formats may assist in developing greater practitioner understanding and clarity.

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

No further comments to add.

## **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.