

- Aboriginal and Torres StraitOccu
OptoIslander health practiceOptoChinese medicineOsterChiropracticParaiDentalPhanMedicalPhysicMedical radiation practicePodicNursing and MidwiferyPsych
- 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 <u>public consultation papers</u> 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 <u>here</u> and Qualtrics <u>here</u>.

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 These responses will not be published.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)

Q24. Publication of responses

Please select the box below if you do <u>not</u> want your response to be published.

Please do <u>not</u> 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?

- Health services provider
- Professional indemnity insurer
- Legal services provider
- Professional body (e.g. College or association)
- \bigcirc

- Education provider
- Regulator
- Government
- Other

Q22. Please write the name of your organisation

Federation of Chinese Medicine & Acupuncture Societies of Australia Ltd (FCMA)

Q17. Which of the following best describes you?

This question was not displayed to the respondent.

Q19. Which of the following health profession/s are you registered in, in Australia?

You may select more than one answer

This question was not displayed to the respondent.

Q8. Before you answer questions about the guidelines

Please ensure you have read the <u>public consultation papers</u> 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?

Q1 Very clear - well organised- easy to follow - logical sequence

Q10. How relevant is the content of the revised guidelines?

Q2 The revised guidelines cover all aspects in a way that is clear to the practitioner

Q3 4.1.3: The sections S117, 119 of the National Law are helpful in establishing the "rightfulness" of a person or practitioner using terms that may suggest that practitioner is registered in acupuncture or Chinese medicine when they are not. This may include those of other professions making statements that can be interpreted to mean they are registered in acupuncture or Chinese medicine, OR, may include Chinese medicine practitioners registered in one division whilst implying they are registered in another. Although these sections are elaborated upon on the last page, S117 & S119 are not commonly cited, while attention is frequently drawn to those sections protective of a registered practitioner using the title "acupuncturist" (S114), or the penalties for others using the term "specialist" (s118). This is unbalanced. More attention is required to the sections that are currently underplayed.

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.

Q4 Much is already included in the way of advertising resources. The "draft guidelines" document presents exceptionally well, and might be relied upon in revising the current online "advertising resources". However, those sections should not be removed, but repeated in a summarised "go to" version of the guidelines, focusing only on key points, examples and flow charts would be most welcome.

Q22. How helpful is the structure of the revised guidelines?

Q5 It is logical, consistent and clear, following the outline/ summary on page 5, which is adequate to those having already acquainted themselves with the issues and with the expectations of the public under consumer law. The later detailed section is easy to follow and helpful in understanding specifics.

Q32. Are the flow charts and diagrams helpful?

- Yes
- 🔘 No

Q34. Please explain your answer.

Q6 A picture is worth a thousand words

Q16. Is there anything that needs to be added to the revised guidelines?

Q7 As per Q 3 above.

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.

Q8 Five years is reasonable. Earlier review might be in response to changes in legislation or similar.

Q24.

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

Q9 Comments incorporated in earlier responses

Q36. Please add any other comments or suggestions for the revised guidelines.

Q10 No further comments

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.