



PRESIDENT

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Mr Martin Fletcher  
Chief Executive Officer  
Australian Health Practitioner Regulation Agency  
Level 7, 111 Bourke Street  
Melbourne Vic 3000

Email: [guidelinesconsultation@ahpra.gov.au](mailto:guidelinesconsultation@ahpra.gov.au)

Dear Mr Fletcher

**Australian and New Zealand College of Anaesthetists  
Public consultation on guidelines and policy – Medical board stakeholders**

Thank you for the opportunity to provide a submission on the revisions to the guidelines for advertising, social media policy and revisions to the guidelines for mandatory notifications. The Australian and New Zealand College of Anaesthetists (ANZCA) provided input into the initial drafting of the guidelines for advertising and mandatory notifications and is pleased to offer additional input into their revision.

As you would be aware ANZCA, which includes the Faculty of Pain Medicine, is committed to high standards of clinical practice in the fields of anaesthesia and pain medicine. As the education and training body responsible for the postgraduate medical training programs in anaesthesia and pain medicine for Australia, New Zealand and parts of Asia, we believe in ongoing continuous improvement and strive to ensure our programs represent best practice and contribute to a high quality health system. In this regard the College and Faculty promulgate professional documents crucial for promoting the quality and safety of patient care for those undergoing anaesthesia for surgical and other procedures, available from: <http://www.anzca.edu.au/resources/professional-documents>, and for pain medicine, available from: <http://www.fpm.anzca.edu.au/resources/professional-documents>.

Please find feedback on the proposed revisions and social media policy below:

**Revision to the guidelines for advertising regulated health services**

As a specialist medical college ANZCA is supportive of the restrictions concerning the word specialist as outlined in section 8.2 *Advertising qualifications and titles*. While the Australian Health Practitioners Regulation Agency maintains a current list of registered specialists, it is unlikely that all members of the public will be able to consult that list when considering their options for a relevant health provider. It is important to ensure the term “specialist” and related post nominals are reserved for those who have attained a registerable specialist qualification. Medical practitioners who present themselves as “pain or anaesthesia specialists” and do not possess the registerable qualification are likely to be misrepresenting themselves to the public.

### **Social media policy**

The *proposed social media policy* provides a brief introduction to social media, focusing particularly on how the obligations outlined in the *guidelines for advertising regulated health services* need to be observed. The document is consistent with the College's policy on social media outlined in section 3.3 of the ANZCA Internet, email and computer use policy (<http://www.anzca.edu.au/resources/corporate-policies/pdfs/anzca-internet-email-and-computer-use-policy-20111121.pdf>).

Social media website's such as Facebook and Twitter are often collections of testimonials, both positive and negative. As the National Law prohibits the use of testimonials in advertising, examples to illustrate how this applies to practitioners, based on these two social media formats, specifically the types of comments that may be seen to violate the National Law would be extremely useful.

### **Revision to the guidelines for mandatory notifications**

The clarifications to the guidelines are welcomed. Due to the sensitive nature of mandatory notifications, case studies could be useful in illustrating the decision making process. An anonymous helpline or advice service for practitioners struggling to determine whether it is necessary to make a mandatory notification about a colleague could provide important guidance and support.

Should you require any further information, please contact John Biviano, General Manager, Policy, via email [jbiviano@anzca.edu.au](mailto:jbiviano@anzca.edu.au) or telephone +61 3 8517 5341.

Yours sincerely



Dr Lindy Roberts  
President