

File ref: P4

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Australian Health Practitioner Regulation Agency (AHPRA)
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By email: guidelinesconsultation@ahpra.gov.au

Public consultation on common codes and guidelines

Thank you for providing an opportunity for the Pharmacy Council of New Zealand (Council) to comment on the revised common guidelines and codes of conduct for Australian regulated health professions.

The Council is a statutory body instituted with the primary purpose of protecting the health and safety of the public. It has the following key functions:

- ❖ Determining scopes of practice for pharmacists
- ❖ Prescribing qualifications required for scopes of practice within the profession
- ❖ Registering pharmacists
- ❖ Setting standards and guidelines
- ❖ Reviewing practising pharmacists when concerns are raised about competence, professional conduct or health
- ❖ Promotion of education and training in the profession.

Comments

Guidelines for advertising

The Council supports AHPRA in the development of advertising guidelines for health professionals. However, as others have commented, although the proposed guidelines are very comprehensive, this makes them very wordy and not necessarily user-friendly. Council suggests they be shortened and simplified. However if they remain as proposed, we believe they would benefit from the inclusion, at the beginning of the guidelines, of a bullet-pointed list of key issues for ease of reference.

Council notes there are considerable references to the National Law throughout the guidelines, duplicating the information on page 10 of the consultation document. This again adds to their lengthy nature, and in our view, reduces their “user-friendliness”. The Medical Council of New Zealand published very concise guidelines¹ on advertising which, if modified to suit the Australian environment, might offer an alternative perspective on how to assist practitioners evaluate whether their advertising complies with the National Law and other legislation and standards.

¹ <http://www.mcnz.org.nz/assets/News-and-Publications/Statements/Statement-on-advertising.pdf>

Section 8.2.1 outlines the use of titles in advertising, and states that “if practitioners choose to adopt the title ‘Dr’ in their advertising and they are not registered medical practitioners then (whether or not they hold a Doctorate degree or PhD) they should clearly state their profession”. The Council suggests this is potentially misleading, as most members of the public would rightly assume the title ‘Dr’ indicates the practitioner is a qualified medical practitioner. Council believes only suitably qualified practitioners should be authorised to use this title, an opinion which appears to be supported by Section 113 of the National Law.

Council recommends that Section 8.3, Advertising therapeutic goods, would benefit from the inclusion of the information in Appendix 4, ensuring any duplicated information is removed to make it more practical.

Social media policy

Given the comprehensive advertising guidelines, the Council strongly recommends guidelines on the use of social media be developed to support the proposed social media policy. The rapid growth in the use of digital and social media has changed the way many people seek and receive health information, making it a communication tool that has the potential to contribute to public health and patient education. Health professionals should be free to take advantage of the many professional and personal benefits social media can offer, but should equally be aware of the potential risks involved. Generic professional guidelines would help inform them of both the benefits and risks.

Council notes that the *Code of conduct* includes guidance on professional behaviour and issues related to privacy and confidentiality of patient interaction and information, including when using social media. However, to support this policy, we would strongly recommend guidelines with specific and relevant recommendations eg the need to keep professional and personal personas separate; to not “friend” or contact patients/customers/clients through personal social media; using portals for confidential interactions with patients; and being security conscious.

Thank you again for giving the Council an opportunity to comment. I trust you find these comments useful.

Yours sincerely



Claire Paget-Hay
Chief Executive & Registrar