

Common policy - Nomination of an alternative name and prohibited names

1 July 2024

Nominating an alternative name for inclusion on the public register and deciding prohibited names

This policy sets out the requirements for registered health practitioners who wish to nominate an alternative name or names to appear on the *Register of practitioners* and provides information on how a decision regarding a prohibited name is made.

Health practitioners are registered under their legal name. However, some health practitioners may wish to practise under an alternative name.

Relevant legislation

Section 131A (1) of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) permits a registered health practitioner or an applicant for health practitioner registration to nominate an alternative name for inclusion on the register. Nominated alternative names will also appear on the registered health practitioner's certificate of registration.

Section 131A (2) of the National Law allows a National Board to refuse to record an alternative name on the register and on the registered health practitioner's certificate of registration if the nominated alternative name is a prohibited name.

Policy position

Registered health practitioners may nominate an alternative name using the FORM or can nominate an alternative name when applying for registration.

Registration of an alternative name is intended to provide flexibility for practitioners who use an alternative name in connection with their practise for legitimate reasons, such as adopting a traditional name or an anglicised or shortened name for example, and to increase public safety by allowing the public to verify a practitioner's registration using their alternative name.

An alternative name used in connection with practise may be an alternative first name, surname or both first and surname. Nominated alternative names will be published on the register, alongside the practitioner's legal name and will appear on the practitioner's certificate of registration.

Only one alternative name (comprising an alternative first name, surname, or both) can be nominated and published.

A National Board may refuse to record an alternative name on the public register and to include it on the registered health practitioner's certificate of registration if it is a prohibited name.

Prohibited names

Nominated alternative names will be considered a prohibited name if they meet any of the following ¹.

The nominated alternative name is obscene or offensive.

1. Names may be considered obscene or offensive if they are:
 - Swear words.
 - Descriptions of lewd or sexual acts.
 - Descriptions of violence.
 - Racial, ethnic or cultural slurs or that imply racial, ethnic or cultural slurs.
 - Names that might be considered reasonably likely to insult, humiliate, offend or intimidate a person or group on the basis of race, gender, sexuality, religion, ability or another distinguishing characteristic.

The nominated alternative name cannot be practicably established by repute or usage because:

2. They are too long.

Names that are very long cannot consistently be used in full either in day-to-day interactions or on standard forms, documentation, or the public register. Current system limitations are 120 characters in total. A nominated alternative name that exceeds this limit may not be able to be recorded on the register or included on a certificate of registration².

3. They consist of or include symbols without phonetic significance.

Names containing numbers or symbols that do not have a corresponding spoken sound are prohibited names. An exception to this is the inclusion of hyphens for hyphenated names (Lisa-Marie or Smith-Jones for example) or an apostrophe where phonetic, familial, or cultural significance applies (O'Dempsey or Fa'anape for example).

4. They are or include a statement or phrase.

Names that contain a statement or phrase, including words that may represent salutations, can be confusing and may be misleading and are prohibited.

5. Or another reason.

Other reasons names cannot be practicably established by repute or usage may include names that look like a religious title, represent a person of religious significance, an official position or other cultural significance or include political slogans.

The alternative names include or resemble:

6. An official title or rank.

Alternative names that contain an official title or rank can be misleading and are prohibited. Examples of titles or ranks that are prohibited include royal or peerage titles, military or law enforcement ranks, political, judicial or academic titles. (Examples include but are not limited to Professor, Duchess, Commander, Commissioner, President etc.)

¹ Examples of prohibited names within this policy are adopted from [Naming Restrictions Policy](#), Births, Deaths and Marriages Victoria, the [Prohibited Name Policy](#) by Registry of Births, Deaths and Marriages, Queensland Government and [Choosing a name](#), NSW Registry of Births, Deaths and Marriages.

² Practitioners whose nominated alternative name exceeds the system limitation and who are able to establish their nominated name can be practicably established by repute or usage, such as a traditional name or cultural name, and that the name is used in connection with their practice may be able to have their nominated alternative name published in a truncated fashion. Practitioners should contact Ahpra in these circumstances.

7. A protected title specified in the Table to Section 11 of the National Law.
8. A specialist title including 'dental specialist' or 'medical specialist'.

The use of protected and specialist titles as alternative names is confusing and may be misleading to the public and these are therefore prohibited names.

The alternative names are contrary to the public interest for another reason.

9. A name may be contrary to the public interest if it is misleading, expresses a meaning or has significance that could cause social disharmony, represents commercial or company interests, may be defamatory, or is chosen for a fraudulent or improper use. Examples may include, but are not limited to, where an alternative name may contravene or conflict with an existing law or registration regime, for example trademark or copyright laws, a name that expresses a meaning or has significance that would cause social disharmony, such as the name of a perpetrator of a crime or a name that implies an official connection to a government or other entity or enterprise, such as the name of a major sporting event or similar.

Complaints about decisions to refuse to record a nominated alternative name on the public register or to include a nominated alternative name on a certificate of registration.

National Boards make decisions about prohibited names on a case-by-case basis and nominated alternative names are assessed against this policy to determine if a nominated alternative name is a prohibited name.

Individuals who disagree with a decision to refuse to record a nominated alternative name on the public register or to include a nominated alternative name on a certificate of registration can make a submission to the National Board to have the decision reconsidered. Submissions should be accompanied by supporting information such as evidence that the nominated alternative name is used in connection with the health practitioner's provision of a health service.

Publication date

Date of publication of common policy: 1 July 2024

Review

This policy will be reviewed at least every five years, or earlier as required.