29th May 2013

AHPRA Public Consultation paper-Medical Board Stakeholders

Dear Sir/Madam

Re: Public consultation-proposed social media policy

On the basis that I provided feedback to the previous draft guideline which was circulated by AHPRA, along with my ongoing participation in social media I now provide the following response to the questions in the draft document.

- Do you support the approach of including general guidance in the draft policy, the Guidelines for advertising and Good Medical Practice, with appropriate cross-referencing? Yes, on the basis that there are common principles and regulatory requirements that must apply with respect to the use of all forms of media by healthcare workers. Social media should not be seen to be an exception
- 2) Does the guidance in these documents reflect the National Boards regulatory role? Yes it does. However the guidance may need to be enhanced particularly in Section 8.1 with respect to the actions that are required to be taken by health care practitioners should they discover that there is inappropriate content posted on a web site that they are responsible for. In fact prevention is a better mode of dealing with this type of threat and should be a consideration when web sites are initially set up-i.e. all posts should be screened and or moderated.
- 3) Do you agree with the approach of referring practitioners to other sources for guidance on social media that goes beyond the National Board's regulatory role? Yes I do as long as this is made explicit and the appropriate documents from Professional organisations are clearly referenced (including via links to web sites for the electronic format), and can be easily accessed.
- 4) *Is the content of the draft Social media policy helpful?* Yes, I believe it is, in that there does need to be a clear understanding of the current regulatory issues and requirements.
- 5) Is there any content that needs to be changed, added or deleted in the draft policy? Moving to an online presence provides both risks and

rewards to healthcare practitioners. Risks include not only inappropriate content being placed onto web sites but also hacking with the ensuing even greater risk of one's own social media site then 'sending out' inappropriate content to other sites. Hence the guidance with respect to vigilance and what steps are then required may need to be strengthened-including with respect to hacking and spam. At times this may require involvement of the police.

6) Do you have any other comment s on the draft policy? No. However it may be useful for AHPRA to actually commence using its established twitter account for relaying information.

Sincerely

Mm

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