



## Accreditation Marketing Policy

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## Glossary of Terms

Term	Meaning
<b>Accreditation</b>	Accreditation of a degree program, Intern Training Program (ITP), a Continuing Professional Development (CPD) accrediting organisation or CPD activity against defined standards to ensure that the education and training is rigorous and prepares individuals to practise a health profession safely.
<b>Accredited pharmacy program</b>	Collective term used to refer to pharmacy degree programs and ITPs that have been assessed by the APC Accreditation Committee (AC) to be 'compliant' or 'substantially compliant' with the Accreditation Standards.  <i>Please note that the APC AC provides accreditation recommendations to the Pharmacy Council of New Zealand (PCNZ) regarding programs delivered in New Zealand by NZ providers. The AC does not accredit these programs directly.</i>
<b>Accredited program provider</b>	Refers to an organisation that is responsible for delivering an accredited pharmacy program.
<b>CPD accrediting organisation</b>	Refers to an organisation accredited by APC to accredit pharmacy CPD activities on its behalf.
<b>Continuing Professional Development (CPD)</b>	The means by which members of the profession maintain, improve and broaden their knowledge, expertise and competence, and develop the personal and professional qualities required throughout their professional lives <sup>1</sup> .
<b>CPD activities</b>	The activities undertaken by members of the profession which enable them to maintain, improve and broaden their knowledge, expertise and competence, and develop the personal and professional qualities required throughout their professional lives <sup>1</sup> .
<b>CPD activity provider</b>	Refers to providers of CPD activities for the pharmacy profession.  <i>NB: Please note that in some instances the CPD accrediting organisation and the CPD activity provider is the same.</i>

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<sup>1</sup> This definition is adopted from the PharmBA [Registration Standard – Continuing professional development](#).

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## List of Abbreviations

<b>Abbreviation</b>	<b>Term</b>
<b>AC</b>	Accreditation Committee
<b>ACL</b>	Australian Consumer Law
<b>ACCC</b>	Australian Competition and Consumer Commission
<b>APC</b>	Australian Pharmacy Council
<b>CPD</b>	Continuing Professional Development
<b>ITP</b>	Intern Training Program
<b>PharmBA</b>	Pharmacy Board of Australia
<b>PCNZ</b>	Pharmacy Council of New Zealand

# Accreditation Marketing Policy

## 1. Purpose

To ensure the marketing of programs is undertaken in a professional manner that reflects the integrity and reputation of both the profession and all the relevant parties involved in the delivery of accredited pharmacy programs and Continuing Professional Development (CPD) activities.

## 2. Scope

This policy applies to all APC accredited pharmacy programs and providers, CPD accrediting organisations and CPD activity providers. It also applies to pharmacy program providers who are seeking program accreditation.

## 3. Policy statement

Advertisers must be aware of their obligations under law. In Australia, this is the Australian Consumer Law (ACL) as this policy aligns to ACL section 18(1) which provides that:

*'A person must not, in trade or commerce, engage in conduct that is misleading or deceptive or is likely to mislead or deceive.'*

In addition to applying to persons generally, this section applies as a Commonwealth law to the conduct of corporations (s131, CCA). In New Zealand, this is the Fair Trading Act 1986 (s13) which provides that:

*'No person shall...(s13e) make a false or misleading representation that goods or services have any sponsorship, approval, endorsement, performance characteristics, accessories, uses, or benefits.'*

The Australian Competition and Consumer Commission's (ACCC) current enforcement priorities highlight the need for companies to take a proactive approach to monitoring promotional activities. False and misleading advertising are encompassed within the ACL and where marketing and advertising are found to contravene the Accreditation Marketing Policy, APC may refer matters to the relevant regulatory body.

### 3.1. Usage of APC logos and promotional statements

#### 3.1.1. Authorised use of the CPD logo



Figure 1: APC CPD logo

- The APC CPD logo is a nationally consistent and distinguishable mark to be displayed on accredited CPD activities to demonstrate currency of accreditation status, that an activity has been allocated CPD credits and it meets the requirements for accredited CPD<sup>2</sup>.
- APC provides a unique letter identifier for each CPD accrediting organisation to display as the prefix letter in conjunction with their accreditation numbering system i.e. AA---. This must be displayed on all accredited activities.

<sup>2</sup> As prescribed in the [PharmBA CPD guidelines](#).

- In instances, where more than one CPD accrediting organisation has accredited the same CPD activity, the following statement must accompany the APC CPD logo and the accreditation numbers:

*Either Code X or Code Y are suitable for inclusion in an individual pharmacist's CPD Plan.*

This APC CPD logo must be displayed in a way that clearly identifies both the activity's status and the unique identifier adjacent to the logo. It should be displayed in a manner that clearly states the credits allocated and status of the accredited activity.

- One of the following statements must accompany the APC CPD logo and accreditation number:
  - *This activity has been accredited for X hours of Group X CPD (or X CPD credits) suitable for inclusion in an individual pharmacist's CPD plan. **OR***
  - *This activity has been accredited for X hours of Group X CPD and X hours of Group X CPD (for the interactive workshop component). This comprises a total of X CPD credits suitable for inclusion in an individual pharmacist's CPD plan. **OR***
  - *This activity has been accredited for X hours of Group X CPD (or X CPD credits) suitable for inclusion in an individual pharmacist's CPD plan which can be converted to X hours of Group X CPD (or X CPD credits) upon successful completion of relevant assessment activities.*

#### Examples:

- This activity has been accredited for 6 hours of Group 1 CPD (or 6 CPD credits) suitable for inclusion in an individual pharmacist's CPD plan.
- This activity has been accredited for 6 hours of Group 1 CPD and 6 hours of Group 2 CPD (for the interactive workshop component). This comprises a total of 18 CPD credits suitable for inclusion in an individual pharmacist's CPD plan.
- This activity has been accredited for 6 hours of Group 1 CPD (or 6 CPD credits) suitable for inclusion in an individual pharmacist's CPD plan which can be converted to 6 hours of Group 2 CPD (or 12 CPD credits) upon successful completion of relevant assessment activities.

#### 3.1.1.1. Additional information relating to the use of the APC CPD logo

- CPD accrediting organisations must ensure there are no false or misleading statements making claims that APC itself has assessed or accredited the CPD activities.
- CPD activity providers must not identify the organisation that has accredited the activity in promotional material except by the use of the unique letter identifier supplied by the CPD accrediting organisation when the activity is accredited.
  - In instances where the CPD activity provider and the CPD accrediting organisation are the same, the organisation's logo must not visually be linked to the accreditation outcome.
- CPD activity providers may choose to include in their promotional materials that the provider has applied for accreditation. Therefore, they may use a statement such as '*currently applying for accreditation*' or '*seeking accreditation*' in their promotional materials. However, CPD activity providers must not give an indication of a likely outcome of the accreditation while advertising. For example, the amount of credits awarded should not be advertised until accreditation is granted.
- CPD activity providers and CPD accrediting organisations must ensure that advertising comprises no more than 20% of total space allocated in and around the printed content of any material relating to the activity (e.g. PowerPoint slides).

- The CPD logo must not be used by CPD providers until formal approval from the APC is granted.
- The CPD logo may be used while a reaccreditation review is being undertaken.

#### 3.1.1.2. Other information

- CPD accrediting organisations may use the following statement in either electronic, print or other promotional materials to show that the organisation has been accredited by the APC to accredit CPD activities.

*Under the auspices of the Australian Pharmacy Council the [Name of Organisation] may accredit continuing professional development for pharmacists that is eligible to be used as supporting evidence of continuing competence.*

#### 3.1.2. Promoting the status of accreditation applications / Notifications of Change

With regard to a program provider who has submitted an application for accreditation of a new/changed program and is awaiting an accreditation decision by the APC AC and approval by the PharmBA, the proposed, unaccredited program can be promoted with the following requirements:

- the following statement must be added to all promotional material:  
*'The program is seeking, but has not yet been granted, accreditation from the Australian Pharmacy Council and approval from the Pharmacy Board of Australia.'*
- any public statements/material issued by the program provider must be accurate
- any false or misleading statements will be publicly corrected by APC
- failure of a program provider seeking accreditation to remove or correct non-compliant promotional material may result in the processing of their accreditation application being suspended (in accordance with the APC NoC process)

Part 3.2 (below) regarding false and misleading claims also applies to program providers seeking accreditation or submitting a Notification of Change for an existing accredited program.

Program providers are reminded that the APC does not grant retrospective accreditation of programs.

#### 3.1.3. Authorised use of the Accredited Program logo



Figure 2: Accredited Program logo

- An APC accredited program may use the APC Accredited Program logo in either electronic or print media. Its use must be accompanied by a statement identifying the name of the accredited program provider and its accreditation status. Both the logo and statement must be prominent in any material used for promotional and descriptive purposes.

- The Accredited Program logo remains the exclusive property of the APC and may not be altered, incorporated into other illustrations, reproduced or displayed for any purpose other than that approved without prior written approval of the APC CEO.
- The Accredited Program logo may not be used in a manner that either indicates or implies an association, endorsement or support for third party products and services and may not be used in any such manner which may compromise the integrity of the APC.

#### 3.1.3.1. Wording to accompany the logo regarding accreditation status

With regard to the accreditation status and accreditation types conferred on accredited pharmacy programs within the remit of the APC to confer, the following statements should be made in conjunction with logo display:

- **Accredited with conditions**

*This program has been granted 'accreditation with conditions' by the Australian Pharmacy Council. For information regarding the approval status of the program, please refer to the Pharmacy Board of Australia website.*

- **Accredited**

*This program has been granted accreditation by the Australian Pharmacy Council and is approved by the Pharmacy Board of Australia as a qualification leading to registration as a pharmacist in Australia.*

## 3.2. False and misleading claims

Accredited program providers, program providers seeking accreditation, CPD accrediting organisations and CPD activity providers must not give false or misleading information or advice in relation to:

- the type and number of CPD credits allocated (e.g. one Group 1 credit)
- the currency of their accreditation status
- usage of terms other than PharmBA or PCNZ endorsed and approved nomenclature
- claims relating to an application for accreditation and possible outcomes of the accreditation process
- graduate outcomes associated with the program seeking accreditation or approval
- the employment outcomes associated with a course
- possible migration outcomes
- any other material issues and or matters of substance

#### Example of a false or misleading claim:

A program provider promotes an unaccredited and unapproved course that **implies it is a registrable pharmacist qualification.**

*A degree has been offered to students for several years but now the program provider plans to offer a new degree program. An application has been made to the APC to accredit the new degree program offered and the university has begun to market the new course on its website as a registrable pharmacist qualification which is open for enrolments with a specific starting date.*

#### Why is this claim misleading?

The university is in breach of the APC policy because it is marketing the commencement date for a course that is neither accredited or approved. The university should have added the wording under part 3.1.3 (above) to make it clear that the advertised program's accreditation status / commencement date is not yet confirmed. The promotion may be misleading to students who believe that the program leads to pharmacist registration with the PharmBA or will begin on the advertised date.

## 4. Roles and responsibilities

The APC Accreditation Team is responsible for implementation and ensuring compliance with this policy through the creation and maintenance of effective procedures.

CPD accrediting organisations must ensure that the policy is implemented and that CPD activity providers are informed and compliant with the policy.

Accredited program providers must ensure that the policy is implemented and that all necessary parties are informed and compliant with the policy.

## 5. International accredited programs

On request APC will review and assess international pharmacy degree programs against the Accreditation Standards for Pharmacy Programs in Australia and New Zealand 2020 as an independent international quality improvement review. Graduates from these programs **will not** be eligible for registration in Australia with the PharmBA. To ensure this distinction cannot be misunderstood and to create a distinctive visual difference international programs may use the following logo in accordance with 3.1.2:



Figure 3: International Accreditation logo

## 6. Discontinued use of APC logo

At the expiry of an accredited period, the previously accredited program provider, accredited CPD activity provider or CPD accrediting organisation must discontinue use of the APC logo.

## 7. Related documents/Links

1. Australian Competition Law (ACL) 2010, *Australian Consumer Law (Sch 2, Competition and Consumer Act 2010 (Cth))*, viewed 15 May 2020, <https://www.australiancompetitionlaw.org/legislation/provisions/acl18.html>
2. Australian Health Practitioner Regulation Agency (Ahpra) 2009, *Health Practitioner Regulation National Law 2009*, viewed 7 February 2020, <https://www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx>
3. Australian Pharmacy Council 2013, *Accreditation Standards for Continuing Professional Development Activities*, Australian Pharmacy Council, viewed 14 August 2020, <https://www.pharmacycouncil.org.au/resources/accreditation-standards-for-cpd>
4. Australian Pharmacy Council 2015, *Accreditation Standards for Continuing Professional Development Activities: Guidelines*, Australian Pharmacy Council, viewed 14 August 2020, <https://www.pharmacycouncil.org.au/resources/accreditation-standards-for-cpd>
5. Australian Pharmacy Council 2020, *Accreditation Standards for Pharmacy Programs in Australia and New Zealand 2020*, Australian Pharmacy Council, viewed 14 August 2020, <https://www.pharmacycouncil.org.au/resources/pharmacy-program-standards>
6. Commonwealth Consolidated Acts 2001, *Corporations Act 2001 – Sect 131*, viewed 15 May 2020, [http://www5.austlii.edu.au/au/legis/cth/consol\\_act/ca2001172/s131.html](http://www5.austlii.edu.au/au/legis/cth/consol_act/ca2001172/s131.html)
7. Parliamentary Counsel Office 1986, *Fair Trading Act 1986 – Sect 13*, viewed 15 May 2020, <http://www.legislation.govt.nz/act/public/1986/0121/latest/DLM96908.html>
8. Pharmacy Board of Australia 2015, *Guidelines on continuing professional development*, viewed 12 May 2020, <https://www.pharmacyboard.gov.au/codes-guidelines.aspx>
9. Pharmacy Board of Australia 2015, *Registration Standard: Continuing professional development*, viewed 12 May 2020, <https://www.pharmacyboard.gov.au/Registration-Standards.aspx>

