



## GUIDANCE FOR OPTOMETRISTS ON USE OF THE TITLE 'DOCTOR'

### Key points

The Optometrists and Dispensing Opticians Board (ODOB, the Board) is the responsible authority for the regulation of registered optometrists and dispensing opticians in Aotearoa New Zealand (NZ). The Board is not able to authorise practitioners to use the title 'Dr' or Doctor'.

The Board advises that practitioners should be aware of New Zealand laws governing the use of names and titles. There are risks to using the title 'Dr' or 'Doctor' by persons who do not hold an appropriate university degree (a PhD or doctorate) and are not medical practitioners.

In Aotearoa New Zealand (NZ), section 20 of the Summary Offences Act 1981 makes it an offence for any person to represent, in connection with their trade or profession, that they hold a degree, diploma or certificate when that is contrary to fact. The section contains an exception which allows medical practitioners, specifically, to use the title 'doctor' despite not holding a doctorate degree.

### Background

The Optometrists and Dispensing Opticians Board (ODOB, the Board) is the responsible authority for the regulation of registered optometrists and dispensing opticians in Aotearoa New Zealand (NZ).

Since 2020, the Board has received several queries about the use of the title 'Dr' by optometrists who do not hold a Doctor of Philosophy (PhD) or a Bachelor of Medicine and Bachelor of Surgery (MBChB, or medical degree). This was followed by a viewpoint article published in 2021<sup>1</sup>. The Board understands that this may partly be driven by developing practices in Australia.

Individual optometrists need to decide for themselves what names, titles and labels they use for themselves and in their practice. However, due to the volume of queries received the Board is providing guidance on this issue. For the avoidance of any doubt, this is not a formal standard for the purposes of s 118(i) of the Health Practitioners Competence Assurance Act 2003 (HPCA Act).

### Guidance

#### *The Board's role*

1. The principal purpose of the HPCA Act is to protect public health and safety by ensuring health practitioners are competent and fit to practise. The Optometrists and Dispensing Opticians Board (ODOB, the Board) is responsible for the regulation of registered optometrists and dispensing opticians in Aotearoa New Zealand (NZ).
2. The Board's functions include setting standards of clinical competence, cultural competence and ethical conduct to be observed, and promoting education and training in the profession. The Board can provide guidance to practitioners on appropriate representations to the public, and relevant statutory obligations.

<sup>1</sup> Robert J Ng and Renita M Martis (2021): Benefits of adopting the courtesy title 'Doctor' by optometrists in New Zealand, *Clinical and Experimental Optometry*, DOI: 10.1080/08164622.2021.1927677.

3. However, the Board considers that it is not within its role or functions to expressly authorise practitioners to use the title 'Doctor' or 'Dr'.

#### ***Use of names and titles***

4. In Aotearoa New Zealand (NZ), section 20 of the Summary Offences Act 1981 makes it an offence for any person to represent, in connection with their trade or profession, that they hold a degree, diploma or certificate when that is contrary to fact. The section contains an exception which allows medical practitioners, specifically, to use the title 'doctor' despite not holding a doctorate degree.
5. The Board's view is that there are potential risks to the use of the title of 'Dr' or 'Doctor', as a 'courtesy title' by practitioners who are neither medical practitioners nor hold an appropriate university Doctorate degree.
6. Additionally, under section 7 the HPCA Act, persons may only use names, words, titles, initials, abbreviations, or descriptions stating or implying that they are a health practitioner of a particular kind, if they are qualified and registered as a health practitioner of that kind. This is an important rule that protects the titles associated with our own, and other, health professions. To comply with section 7, practitioners should be careful that any use of the title 'Dr' or 'Doctor' does not imply to members of the public that they are medical practitioners.
7. Where a practitioner does hold an appropriate university degree and wishes to use the title 'Dr' or 'Doctor', it would be best practice to make clear in doing so that they are not a medical practitioner. This could be done by following their name by their profession, i.e., 'Optometrist', and explicitly listing their qualifications.
8. Practitioners should seek their own legal or other advice if they are uncertain about whether the title 'Dr' or 'Doctor' can be used.

#### **Other related policies or legislation**

9. The ODOB's *Statement on internet and electronic communication*
10. The ODOB's *Advertising guidelines for optometrists and dispensing opticians*

Revision history		
Version 1	November 2023	Drafted and approved