

SMC's Response to SMA's Email Query

ON 15 May this year, Dr Daniel Lee wrote an email query letter to the Singapore Medical Council (SMC) Executive Secretary, on behalf of SMA, enquiring about doctors' participation in websites that list doctors' details and services. We herein reproduce the email query and SMC's response in full.

15 May 2015

SMA's email to SMC Executive Secretary

Dear Ms Tan,

SMA has been informed by some members that doctors' details have been made available through websites apparently offering appointment services (eg, <https://www.docdoc.sg/>, <https://www.practo.com/>) whether by direct registration, or by the site entering the details without the doctor's permission.

We would like to ask if SMC would consider that the

doctor has contravened the SMC Ethical Code and Ethical Guidelines if he participates actively, or if he is merely listed on the website without his expressed agreement.

Yours sincerely,

Dr Daniel Lee
Honorary Secretary
Singapore Medical Association

SMC's reply

Dear Mr Lee,

We refer to your email dated 15 May 2015 enclosing an email from Dr Daniel Lee.

The email in question raises the matter of whether there has been a contravention of the Ethical Code and Ethical Guidelines (ECEG) by active involvement in either of the two portals listed. As is the case with advertising on any platform, the concern would be more on the quality and standards of information than the availability of the platform itself. For that reason, to the extent either portal provides only factual information on the doctors (eg, factual information on the specialisation of a doctor, contact details and opening hours), this is unproblematic as the ECEG explicitly allows factual information on doctors to be provided to the public (Sections 4.4.1 and 4.4.2 of the ECEG).

However, where the doctor actively provides information that can be used in a misleading fashion, or otherwise participates actively in any website that they know may use such information in a manner which is comparative in nature, or would otherwise be used in a manner inconsistent with the principles set out in Section 4.4.1, such acts may amount to a contravention of the ECEG. Though not exhaustive, this would include the provision of special discounts, or gifts, or any other financial incentive to the patient for using such platform, or involvement in

platforms where testimonials are used as part of a doctor's listing or advertisement. Furthermore, while paying for advertising one's practice is allowed, the ECEG disallows doctors from being involved in "fee-sharing" arrangements with third parties, including such websites.

On those fronts, it would appear to us that participation in a directory-like structured website is not inappropriate, while active participation in any website providing "ranking-table" like frameworks (based on parameters that may not be objectively based on factual matters), where doctors can be involved in special "promotions" or provide other inducements for use of services or where patient testimonials are utilised, may contravene the ECEG. As it may be inappropriate for us to make determinative pronouncements on individual websites, especially in the absence of a complete understanding of the website's listing methodologies and their financial arrangements (if any) with the medical community, doctors may wish to consider for themselves how the application of such principles might apply to each of these websites.

Kind regards

Selven Sadanodom
Deputy Head (Corporate Communications),
Administration Division
Singapore Medical Council