# NFTHD #113: HCP Verification - Restricting access without restricting innovation

*In this Notes from the Help Desk, we explore a question that is becoming increasingly common as companies reassess traditional username-and-password models and explore new ways of verifying healthcare professional status online.*

The Code requirement itself is relatively straightforward. Section 2(g) of the Code provides that companies are responsible for ensuring that materials directed to healthcare professionals are only able to be viewed or accessed by healthcare professionals. The practical challenge is determining what measures are appropriate to verify that the person seeking access to online content is, in fact, a healthcare professional, particularly as companies continue to evolve their digital platforms and user experiences.

Historically, many companies have achieved this through account-based systems, requiring healthcare professionals to create a username and password before accessing restricted content. While neither the Code nor the TGA guidance requires password-protected access, it is notable that both refer to it as an example of an appropriate control (Code Section 2.2(g)). For many companies, this will provide a level of comfort that they are adopting a tried and tested approach. Equally, the Code does not mandate a particular verification approach, allowing companies to consider alternative models that are appropriate to the content, technology and user experience involved.

## So, does the Code require a particular verification method?

No.

The Code is principles-based and does not mandate a particular process, nor does it require username/password protection, account creation or any other specific verification mechanism. Instead, the focus is on the outcome: ensuring that materials directed to healthcare professionals are only able to be viewed or accessed by healthcare professionals.

## Can companies use alternative verification models?

Potentially, yes.

While password-protected access remains a familiar and well-established approach, the Code does not limit companies to a single verification model. As technology evolves, companies may wish to explore different ways of establishing healthcare professional status and managing access to restricted content.

The TGA guidance is also useful in this regard. While it does not set mandatory requirements, it provides examples of measures that may be used to help verify professional status, including a statutory declaration from the individual or their employer in combination with other identity confirmation protections. This confirms there may be a range of approaches available, depending on the circumstances.

*Published November 2026*

## What factors might companies consider?

As with many areas of compliance, context matters. When evaluating different approaches, companies might consider:

- **The nature of the content**: Extensive promotional material, product information and downloadable resources may warrant a different level of control than more limited content.
- **The level of assurance provided by the verification process**: Different verification methods provide different levels of confidence that a user is a healthcare professional. The appropriate level of assurance may depend on the content being accessed.
- **The broader access environment**: Companies may also wish to consider how their chosen model addresses access by unintended audiences, including individuals who obtain access unintentionally or deceptively, and automated technologies such as web crawlers, bots, search indexing services and AI agents.

## What happens when verification is uncertain?

Most verification processes won't produce a clear outcome in every case. Depending on the model adopted, there may be instances where an individual cannot be verified through the primary process or where the result is inconclusive.

While verification against an AHPRA registration or other healthcare professional data source may be a suitable approach in many cases, it remains important to be clear about who is eligible for access and how that eligibility will be established. This can be particularly helpful when a verification outcome is unclear or inconclusive (**see NFTHD #46 "Who is a HCP**").

Where eligibility cannot be established, access would generally not be provided until the matter has been resolved.

## Final reflections

Ultimately, the Code does not require a particular verification mechanism. Password-protected access remains a recognised and well-established approach, reflected in both the Code and TGA guidance. However, neither source mandates a single verification model.

As technology evolves, companies may choose to explore alternative approaches. The key question is not whether a particular mechanism is used, but whether the overall approach is appropriate to ensure that materials directed to healthcare professionals remain accessible only to healthcare professionals.

<end>

*Published November 2026*

Medicines Australia