

4.14 Advertising

Purpose:

Advertising is the use of space or time in a public medium, or the use of commercial publication such as a brochure or social media, to communicate with the general public or a segment thereof, for the purpose of promoting professional services.

Policy:

In order to maintain the professionalism of physiotherapy in Manitoba, advertising and other promotional activities by physiotherapists must not be capable of misleading the public. Mottos and text must not appeal to a layperson's fears or lack of knowledge and must be relevant to promoting rehabilitation and wellness within the scope of physiotherapy practice. The above statements relate to all forms of advertising, whether it is in the electronic or print media (including any form of printed material), or on signage. Marketing by physiotherapists, physiotherapy facilities or entities providing physiotherapy services should serve a legitimate purpose in providing the public with relevant information and must be truthful, tasteful and professional in nature. A physiotherapist is responsible for ensuring advertising on their behalf complies with this practice statement.

Guidelines:

A physiotherapist demonstrates the practice standard by:

1. Ensuring that advertising and promotional activities are:

- a) **Truthful**
Information must be factual and accurate and not promote a demand for unnecessary services or provide guarantees of success/results. It cannot mislead the public in any way.
- b) **Tasteful**
Marketing must be dignified, in good taste and compatible with the best interests of the public. Marketing shall not bring the physiotherapy profession into disrepute.
- c) **Professional**
Advertising should not call into question the competence of any other physiotherapist. Statements implying superiority of services, equipment or techniques cannot be used. Testimonials or endorsements imply superiority, and are therefore disallowed. This includes social media commentary that can be perceived as testimonials. These statements need to be removed from the physiotherapy clinic or physiotherapists social media account.

2. Refraining from:

- a) Using incentives or offering free services
Promotional selling of physiotherapy treatment services in the format of gift certificates, auctions, raffles, offering air miles or other loyalty rewards, etc. to entice current and or future patients to attend is considered unethical. Free services are only permitted when volunteering at a professionally appropriate event (i.e. a community sporting event/run).
- b) Offering giveaways
Such as TVs, smart phones, electronic devices, or other high value products that may be raffled off or given to a patient and/or future patient are considered unethical.
- c) Package deals or bundling of services
Advertising package deals or time limited pricing is not in keeping with client-centered care and the physiotherapist's responsibility to address the client's treatment goals. This type of fee bundling is not supported by the College of Physiotherapists of Manitoba. *Please also refer to [Practice Direction 5.2 Fee Schedules and Billing Practices](#).*

Note: This does not prohibit a physiotherapist from making charitable donations for non-physiotherapy services or products such as a t-shirt, pen, calendar or sponsoring an event.

3. Ensuring content is within the scope of physiotherapy practice and is professionally appropriate. It is important to ensure that any advertising does not encourage the public to partake in unnecessary services.

4. Retaining a copy of advertising materials by the registrant for a minimum of two years.

The following are considered advertising or promotional material and therefore conform to the above guidelines.

1. **Professional Announcements**

The following information can be included in advertising, such as professional announcements:

- Names
- Qualifications
- Title of business
- Address
- Phone/fax numbers/ e-mail address
- Languages
- Days/hours of practice
- Logo
- Internet sites and social media links
- Limitations of practice (e.g. limited to musculo-skeletal conditions)
- Location information
- Services available
- Method of Payment

2. **Telephone Directory**

Listings and advertising in telephone directories must conform to all the above.

3. **News Media**

A registrant must conform to the above guidelines on advertising.

A registrant must not state publicly that he or she speaks on behalf of the CPM unless he or she has been expressly authorized by the College of Physiotherapists of Manitoba to state the official position of CPM.

4. Signage

Signage must conform to the information above.

Signage must allow the public to be aware of the presence and location of a physiotherapist or physiotherapy services. Signs must be informative and should contain only the items contained under “Professional Announcements”.

5. Promotional Material

The use of promotional material is permissible, provided that the material conforms to the advertising policy.

6. Logo Usage

Use of the CPM logo is prohibited.

Newsletters, blogs, and other social media postings are considered promotional material and their purpose must be to further the public’s education and information on issues relevant to physiotherapy, the public’s health and services provided by a clinic.

As a service to its registrants, the College of Physiotherapists of Manitoba will review any advertising to ensure adherence to guidelines and regulations as well as investigate any complaints or concerns relating to advertising.

Frequently Asked Questions about Advertising

1. Why aren’t testimonials allowed?

Testimonials are considered to be misleading because only favourable comments are used, leaving the public with biased and unbalanced thoughts. The information is unreliable and does not educate the public on facts.

2. What if an employer or administrator is responsible for the advertising including the services provided by physiotherapists?

A physiotherapist is responsible for ensuring that any advertising on their behalf complies with this practice statement. If the advertising does not comply, the therapist is held accountable.

3. Can I hand out free pens or a t-shirt with my company logo and contact information as a way of advertising?

Yes, token items such as pens, t-shirts, ice packs or other inexpensive items may be used to advertise services provided the other guidelines of this practice standard are met.

4. Can we use the personal information from the entry slips from a draw to do future advertising?

No, collecting personal information from the public by way of a draw/raffle to use for future advertising is not permitted.

5. Can I offer a coupon or gift certificate for free assessments or other physiotherapy services to attract patients?

No, offering free physiotherapy services is not permitted. Free services are only permitted when volunteering at a professionally appropriate event (i.e. a community sporting event/run).

6. Can you have social media accounts for your business?
Yes, however, you must comply with all of the other guidelines of this practice statement.
7. Are patient/public comments allowed on the business social media account?
No, social media commentary can be perceived as testimonials. These statements need to be removed from the physiotherapy clinic or physiotherapists social media account. For example, 'Likes' on Facebook are allowed but comments are not.
8. Can I advertise all of the benefits of acupuncture or other services offered even if some of the benefits are out of the scope of physiotherapy?
No, you can only advertise within the physiotherapy practice. For example you cannot advertise that acupuncture can treat menopause, addictions, etc.
9. Can I advertise a discount?
No, although discounts can be offered on a case by case basis (in accordance with 5.2 Fee Schedules and Billing Practices), you are not permitted to advertise this as this is seen as being competitive and may encourage unnecessary services.
10. Can I offer and/or advertise free consultations?
No, this is not permitted. Without a complete assessment the need for treatment cannot be justified and it encourages people to attend for unnecessary services.
11. Can I offer Time-limited pricing?
Time-limited pricing is prohibited because it is a deviation from the documented fee schedule and serves to induce people to seek treatment within a set time frame, whether that treatment is needed or not, thereby promoting unnecessary services.
12. Can I offer a pack deal or bundling of services?
Promotion of unnecessary services includes such things as package deals. While clinical experience may tell you that a patient with a specific diagnosis will typically require a certain number of treatments to improve, selling a package for that number of visits does not allow individualized treatment, nor does it reflect client-centered service. What about the patient who improves faster than average? What if they have an adverse event and don't return? Selling a package deal ensures the business' income at the expense of the client's interests, thereby breaching the physiotherapist's fiduciary duty to put the client's interests first.