
COMMUNICATION TO THE PUBLIC

Standard of Practice S-016
Quality Assurance Committee

Approved by Council: November 28, 2024 (came into effect February 21, 2025)



Note to readers: In the event of any inconsistency between this document and the legislation that affects chiropractic practice, the legislation governs.

INTENT

1. To uphold the public interest by ensuring that members' communication to the public is:
 - accurate, factual and verifiable;
 - maintains a professional image in communicating the delivery of safe, ethical chiropractic care
 - supported by generally acceptable evidence; and
 - within the chiropractic scope of practice.
2. To ensure that the public has the information to make rational choices and obtain the health care services of their choice.
3. To provide guidance to members on how to engage in social media in a professional context and meeting legal, regulatory and professional obligation.

DEFINITIONS

“Communication to the Public” is any message communicated through a public medium, promoting chiropractic services and/or products, including but not limited to: print advertising, materials and posters in member's office, video, audio, websites, social media, and podcasts, that can be seen or heard by the public, or any subset of the public.

“Social media” refers to all web and mobile technologies and practices that are used to share content, opinions, expressions and perspectives online. Social media has become widely used as a means of communication and in many instances, has become the preferred method of communication. Examples of social media platforms, including, but are not limited to: Facebook, X, YouTube, LinkedIn, TikTok, Snapchat and Pinterest.

This standard applies equally to members acting individually, as a group, such as a multi-disciplinary office, or as a professional health corporation. A member is responsible for any communication to the public that is produced on their behalf by an employee or third-party and must ensure that any such communication to the public is compliant with CCO standards of practice and guidelines.

DESCRIPTION OF STANDARD

I. GENERAL COMMUNICATION TO THE PUBLIC REQUIREMENTS

Accuracy and Verifiability

1. A communication to the public must:
 - (a) be accurate, factual and contain information that is verifiable;
 - (b) be readily comprehensible by the target audience; and
 - (c) clearly communicate that the member is a registered chiropractor in Ontario and a member of the College of Chiropractors of Ontario.

Permissible Content

2. A communication to the public may:
 - (a) name a specific diagnostic or therapeutic procedure within the chiropractic scope of practice in accordance with Standard of Practice S-001: Chiropractic Scope of Practice, but cannot claim superiority or endorse the exclusive use of such a procedure;
 - (b) make reference to the member being a specialist, provided the member is a recognized specialist in accordance with Policy P-029: Chiropractic Specialties;
 - (c) make reference to the member being affiliated with any professional association, society or body, other than CCO, only on curriculum vitae, a biographical section of a member's website or social media account, business stationery and recognized public displays;
 - (d) allow an individual or organization to endorse a member, provided,
 - (i) the endorser has sufficient expertise relevant to the subject matter being endorsed;
 - (ii) the member has been appropriately assessed as providing the subject matter being endorsed; and
 - (ii) the member has disclosed any financial or other benefit given or received for the endorsement, if such a benefit has been exchanged.

- (e) include testimonials¹, that refer only to the benefits of chiropractic and not to a particular member or office, or testimonials that refer to a particular member or office only in a member's website, provided the testimonials:
 - (i) are accurate, verifiable, and recorded in the patient health record;
 - (ii) are used only in accordance with the written consent of the patient;
 - (iii) are not obtained using any undue pressure, duress, coercion or incentives;
 - (iv) include a disclaimer stating that the results of the testimonial may not be typical of all patients or that results of patients may vary,
 - (v) do not include any information, testimonial or narrative about the member providing care to the member's own family, and
 - (vi) are otherwise compliant and consistent with the chiropractic scope of practice, privacy legislation, and CCO standards of practice, policies and guidelines.

Prohibited Content

- 3. Any communication to the public with respect to a member's practice must not contain:
 - (a) anything false or misleading²;
 - (b) an express or implied guaranteed success of care;
 - (c) any comparison to another member's or other health care provider's practice, qualifications or expertise;
 - (d) any expressed or implied endorsement or recommendation for the exclusive use of a product or brand of equipment used to provide services;
 - (e) material that, having regard to all the circumstances, would reasonably be regarded as disgraceful, dishonourable or unprofessional.

¹ *Canadian Code of Advertising Standards* from Advertising Standards Canada, section 7 states: "Testimonials, endorsements or representations of opinion or preference, must reflect the genuine, reasonably current opinion of the individual(s), group or organization making such representations, and must be based upon adequate information about or experience with the product or service being advertised, and must not otherwise be deceptive."

² *The Competition Act, 1985* states: "that a misleading "general impression" could be created if an advertisement claim is literally true but misleads by failing to disclose additional vital details needed to interpret claims and make informed purchase decisions. The Competition Bureau of Canada has interpreted "false or misleading" under the *Competition Act, 1985*, to mean that the representation leads a person to a course of conduct that, on the basis of the representation, he or she believes to be advantageous. "Material" does not refer to the value of the product to the purchaser but, rather, the degree to which the purchaser is affected by the representation in deciding whether to purchase the product." Please see a link to the Competition Bureau <https://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/01315.html> for further information.

Communication of Fees

4. A member may communicate to the public their fee(s) for chiropractic services³, provided:
 - (a) the communication is accurate, complete, clear and not misleading (e.g., no hidden fees);
 - (b) the communication of a promotional fee:
 - (i) expressly states the timeframe of the promotion,
 - (ii) does not limit the promotional fee to a specific number of participants, and
 - (iii) does not place an obligation on the patient for any follow-up appointments as a result of the promotional fee; and
 - (c) the communication of fees is presented in a professional manner.

Communication of Exchange of Products/Services for Charitable Donations/Proceeds

5. A member may communicate to the public the exchange of products/services for charitable donations, provided:
 - (a) the donations/proceeds are being collected for a registered charity, school or other organization that services the public interest (“charity”);
 - (b) the charity is disclosed in the communication; and
 - (c) the amount/percentage donated to the charity is disclosed in the communication.

Solicitation of Business

6. A communication to a patient or prospective patient for the purposes of soliciting business must be appropriate to the standards of the profession, comply with anti-spam legislation, be respectful of patient choice, and must not involve undue pressure, including pressuring a patient to bring a family member or guest to a subsequent treatment or appointment, and not promote unnecessary products or services. A member must not contact or communicate with or allow any person to contact or communicate with potential patients via telemarketing or electronic methods.

³ Please see Guideline G-008: Business Practices for more information about billing practices requirements.

II. USE OF SOCIAL MEDIA

Social media may present opportunities for enhancement of patient care, education about chiropractic care, intra and inter-professional communication and collaboration, and opportunities for continuing education and professional development.

A member is expected to comply with all existing legal, regulatory and professional obligations when engaging in the use of social media, including all relevant legislation, regulation, standards of practice, policies and guidelines.

Privacy and Confidentiality

A member must comply with all legal and professional obligations to maintain privacy and confidentiality in accordance with the *Personal Health Information Protection Act, 2004 (PHIPA)* and CCO standards of practice, including:

- (a) not divulge information through social media that identifies a patient by name or through a combination of other identifying information. While patients or members of the public may make themselves publicly known through posting, a member must not breach the privacy or confidentiality of a patient in any context.
- (b) only communicating through secure private messaging for the purposes of scheduling, providing information and other doctor/patient communications.

Clinical Information and Advice

A member:

- (a) may provide general health information only related to the chiropractic scope of practice for educational or informational purposes,
- (b) must not provide any clinical advice, communicate a diagnosis and/or guarantee results to a patient or any member of the public through social media.
- (c) must be cognizant of the risks of using social media for professional reasons, such as a member of the public incorrectly applying information found online to their personal health situation. Whenever a member uses their professional designation or provides health related information, that member is viewed as acting in a professional capacity.

Copyright Considerations

A member must exercise caution when posting health related information and links to journal articles or academic information to ensure he/she is not infringing on any copyrighted material.

Professional Conduct and Boundaries

A member:

- (a) must maintain appropriate professional boundaries, and avoid posting information, comments or images that may reasonably be perceived as disgraceful, dishonourable or unprofessional or as harassment, bullying, or inflammatory comments.
- (b) is encouraged to have separate personal and professional social media pages,
- (c) must consider their legal, professional and regulatory obligations and exercise good judgment and caution before posting material to social media.

III. HEALTH CARE CLAIMS IN COMMUNICATION TO THE PUBLIC

A member must give consideration to the following factors when making health care claims as to the benefit of chiropractic care in communication to the public:

- Does the claim fall within the chiropractic scope of practice?
- Is the claim based on accurate, factual, verifiable, and objective information?
- Is the claim supported by generally acceptable evidence?
- Is the claim otherwise compliant with CCO standards of practice, policies and guidelines?

Generally Acceptable Evidence

When assessing whether there is acceptable evidence for making health care claims in communication to the public, a member must comply with the following:

- The health care claim must relate to the chiropractic scope of practice;
- Evidence supporting the health care claim must be properly communicated to the public in a manner that:
 - Is accurate, verifiable, objective, clear and concise,
 - Is not false or misleading,
 - Does not include a guarantee of success of care,
 - Clearly communicates what is the level of evidence and source of any cited study,
 - Does not exaggerate or extrapolate the results of any evidence,
 - Is communicated in a manner that is understandable to the public, providing appropriate citation(s) from reputable source(s).
- The member must use caution in communicating a health care claim related to a case study or similar study. This includes citing a reputable source, clearly communicating that the results of a study may not be typical of patients, and neither exaggerating nor extrapolating the results of a study;

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- In communicating a health care claim in advertising, websites and social media, the member must not communicate a health care claim that is beyond the chiropractic scope of practice, includes a possible breach of a CCO standard of practice, policy or guideline, is not supported by generally acceptable evidence, or involves a risk of harm to the public.

LEGISLATIVE CONTEXT

This standard of practice should be read in conjunction with:

- Regulation R-008: Professional Misconduct
- Standard of Practice S-001: Chiropractic Scope of Practice
- Guideline G-008: Business Practices
- Guideline G-016: Communication to the Public
- Policy P-016: Public Display Protocol