

CMBA advertising compliance webinar questions and answers

Tuesday 26 August 2025

The Chinese Medicine Board of Australia (the Board) hosted a webinar on advertising compliance on 26 August 2025, a recording of which is available on the <u>Board's website</u>. During the presentation attendees were invited to submit questions for the panel. This document has collected the questions submitted and answers given. To reduce repetition, questions on the same topic have been amalgamated into a single question.

Can you recommend a company to do an audit of my advertising?

Ahpra is not able to recommend third party auditing services, however practitioners are able to conduct their own audits using resources on the <u>Ahpra advertising hub</u>.

Who can advertise that they offer dry needling services?

'Dry needling' is not a health practice that is regulated by the National Law, whereas 'acupuncturists' are.

'Acupuncturist' is a protected title under the National Law, which restricts the title to only those who have been assessed as competent to deliver the specified services. This title is reserved for Chinese medicine practitioners, registered under the division of acupuncture, or for those who have an endorsement of registration in acupuncture. Endorsements are visible to the public, employers and anyone else accessing the public Register of practitioners.

Are randomised control trials (RCTs) necessary for evidence in Chinese medicine?

RCTs are not always available. The <u>Ahpra advertising hub</u> provides details on what constitutes acceptable evidence. The Chinese Medicine Board of Australia has also produced a <u>quick reference guide</u> on acceptable evidence specifically for Chinese medicine practitioners.

Are Cochrane reviews required for evidence cited to back up claims made in advertising?

The level required to satisfy acceptable evidence does not necessary require Cochrane reviews. High quality, peer-reviewed evidence may also be considered acceptable evidence.

Are journals in other languages, particularly Chinese, considered acceptable evidence?

Evidence to support therapeutic claims made in advertising must be publicly available in English.

What is considered acceptable evidence? Can I use case studies? What about recency?

The Ahpra advertising hub provides details on what constitutes acceptable evidence, such as how recent the study was. The Chinese Medicine Board of Australia has also produced a <u>quick reference guide</u> on acceptable evidence specifically for Chinese medicine practitioners.

Case studies are generally considered acceptable evidence where they rate highly against a variety of factors (as detailed on the Ahpra advertising hub), but single case studies are not considered robust.

Australian Health Practitioner Regulation Agency
National Boards
Box 9958 Melbourne VIC 3001 Ahpra.gov.au 1300 419 495

Patient journeys presented as case studies are not acceptable for use in advertising.

Can I advertise that I prefer treating, supporting or have a special interest in certain conditions or patients with certain conditions?

Yes, this is acceptable provided that you do not give the impression that you specialise or are a specialist in those conditions.

Are the terms 'expert' or 'expertise' acceptable in advertising?

No, these terms are not considered acceptable as they may mislead the public on whether you are a specialist or not.

Can I say that I have many years' experience treating patients with symptoms of a certain condition?

Some practitioners post advice about certain foods and herbs on social media. Is this acceptable?

Claims such as these made on social media must be backed up by acceptable evidence.

Would it be acceptable to talk about potential benefits of foods or herbs but include a disclaimer?

Talking about the benefits of food without evidence is generally acceptable, however given their relationship to Chinese medicine, when talking about herbs in advertising, evidence must be provided.

Can I use Chinese medicine terminology and language on my website?

It is considered acceptable to use Chinese medicine terminology in advertising, provided that the meaning of it is made clear to the public.

Can I explain how Chinese medicine treatments benefit patients in my advertising?

When referring to a Chinese medicine therapy or treating a symptom, you must ensure that the information is presented using clear and plain language that the general public can understand. Any claim you make must be backed up by acceptable evidence.

Are mediums such as radio, television and podcast interviews considered advertising?

The <u>Guidelines for advertising a regulated health service</u> define advertising as including, but not limited to, all forms of verbal, printed or electronic public communication that promotes a regulated health service provider to attract a person to the provider (practitioner or business). This includes podcasts and television interviews where the interviewee promotes their own service. Interviewees also must be clear where claims are made that they can be backed up by acceptable evidence.

Is there a limit on the number of treatments I list on my website that I offer?

There is no limit of the number of treatments that can be listed on a website, however advertising must not encourage a person to attend periodic or regular appointments where there is no clinical indication to do so.

Is it acceptable to advertise 'acuneedling' services?

'Acuneedling' is not a protected phrase that is regulated by the National Law, whereas the title 'acupuncturist' is. Anyone practicing as an acupuncturist must be registered with the Chinese Medicine Board of Australia or hold the relevant endorsement for acupuncture.

If a member of the public posts on social media asking for help with symptoms, can I say that I can assist?

Any response you make could be read by the wider public, so it is best that you suggest that the individual contacts you directly.

Are using, linking to or referring to testimonials left on Google reviews allowed in advertising such as on websites or on business cards?

You cannot use a review, or link to a review that references clinical aspects of regulated health services in advertising.

If a patient review on a business website, a service directory or booking site, social media, discussion forums, a search engine, such as Google, or a review platform does not refer to a clinical aspect of the service provided, you can use it for advertising.

The prohibition on testimonials does not impact a patient's ability to leave a review on a third-party website (outside of your control). Advertisers, however, must not make use of testimonials to advertise a regulated health service, or to promote their services. You must not engage with testimonials posted on third party platforms.

Can I use a review on my website that I did not request?

If the review does not refer to clinical aspects of the treatment, you can use it on your website. Examples are given on the Ahpra advertising hub.

A patient has made a social media post about having a treatment with me and how they felt about it. Can I repost this?

If the post does not refer to clinical aspects of the treatment, this is not considered a testimonial and can therefore be used in advertising.

Is a Google review considered a testimonial?

The <u>advertising guidelines</u> define a testimonial as recommendations or positive statements about the clinical aspects of a regulated health service used in advertising. This can include reviews made on social media, business websites and search engines, such as Google.

The prohibition on testimonials does not impact a patient's ability to leave a review on a third-party website (outside of your control). Advertisers, however, must not make use of testimonials to advertise a regulated health service, or to promote their services. You must not engage with testimonials posted on third party platforms.

Should I say that I am an Ahpra-registered or CMBA-registered practitioner?

You can say that you are a Chinese medicine practitioner registered with the Chinese Medicine Board of Australia, however you must not use logos of the Board or Ahpra in your advertising.

Can I list my overseas registration titles on my business card or website?

There is no restriction on this, provided that you are clear on where the overseas qualifications are from and that they were not obtained in Australia.

When is it acceptable to use the title of 'Doctor' for registered Chinese medicine practitioners?

Doctor is not a protected title, but practitioners must be careful about how they use 'Doctor' or 'Dr' in their advertising because the public may typically associate the term with medical practitioners.

If the title 'Dr' is used (in advertising or elsewhere) and does not refer to a registered medical practitioner, then (regardless of whether a doctorate degree or PhD is held) it should be made clear which profession the practitioner is registered in, for example Dr Li (Chinese medicine).

Further guidance on protected titles can be found here and here.

Can other health practitioners, such as physiotherapists, call themselves 'acupuncturists'

'Acupuncturist' is a protected term under the National Law. Anyone using the term must be registered with the Chinese Medicine Board of Australia or hold an endorsement from the Medical Board of Australia.

The term 'acupuncture' is not a phrase that is regulated by the National Law.

What is 'holding out' and how does it apply to acupuncture?

'Holding out' means to present yourself in a way that suggests to others that you are something or someone that you are not.

A person who is not registered as an acupuncturist with the Chinese medicine Board of Australia, must not:

- use any of these titles: Chinese medicine practitioner, acupuncturist, Chinese herbal medicine practitioner, Chinese herbal dispenser, or Oriental medicine practitioner; or
- · claim to be registered under the National Law, or
- 'hold themselves out' as being registered under the National Law.

Further details can be found on the **Board's website**.