College of Registered Nurses of Manitoba

Practice Direction:

Advertising Expectations

The College of Registered Nurses of Manitoba (the College) Council must, by regulation, establish standards of practice to regulate the quality of practice of registrants of the College.

The Council approves practice directions which are written statements to enhance, explain, add, or guide registrants with respect to matters described in the College of Registered Nurses of Manitoba General Regulation or any other matter relevant to registered nursing practice. Compliance with practice directions is required; these expectations also serve as a legal reference to describe reasonable and prudent nursing practice.

It is the responsibility of all registrants to understand all practice expectations and be accountable to apply them to their own nursing practice, regardless of roles or practice settings. Responsibility is the duty to satisfactorily complete your obligations. Accountability means being capable of explaining why you did or did not meet these expectations.

The policies of employers do not relieve individual registrants of accountability for their own actions or the primary obligation to meet practice directions. Employer's policies should not require a registrant to practise in a manner that violates practice directions.

***NOTE:** the use of the word registrant refers to registered nurse, registered nurse (authorized prescriber), registered nurse (nurse practitioner), registered nurse (graduate nurse practitioner), and graduate nurse.*

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Background

When a client enters into a therapeutic relationship with a registrant to receive care, or purchase a product, they are making an important decision that may have a significant impact on their health and well-being. These decisions can be influenced by advertising messages clients have seen or heard.

When used appropriately, advertising can be a valuable tool for the public in locating registrants who are offering the products and care they need. However, when advertising is done unethically or improperly, it may impact client decision making, thereby introducing a risk of harm to the client.

Purpose

The purpose of this practice direction is to reduce the risks associated with advertising by ensuring that advertising related to a registrant's practice is conducted ethically and in the public's interest.

Definition of Advertising

For the purposes of this document, "advertising" means any communication made orally, in print or through electronic media, by or on behalf of a registrant, to the public generally or to one or more individuals, that has as its substantial purpose the promotion of the registrant or a non-institutional setting or a group with which the registrant is associated (adapted from the College of Physicians and Surgeons of Manitoba, 2019).

Advertising of nursing care can take many forms and media. The following list provides some examples of activities that meet the definition of advertising:

- An announcement in a flyer or newspaper.
- Email communication intended to promote or inform the recipient of details of a registrant's practice.
- A social media post about care offered by a registrant (including any messaging in the post itself, or captions associated with it).
- A sign or billboard promoting a new clinic or service.
- A website providing information about a registrant's practice.
- A video or audio recording promoting a registrant's practice played on television, radio, podcast, or the internet; or
- A television or radio interview where a registrant provides information intended to promote their self-employed practice.

Activities *not* Classified as Advertising

Registrants communicating for the purpose of client advocacy, education, health promotion, human resource recruitment and research/knowledge translation are typically not considered advertising and therefore not within the scope of this practice direction.

Accountability for Advertising Expectations

Often, registrants are directly involved with the creation and dissemination of advertising. Sometimes, registrants may not be directly involved in advertising their care. These situations may include, for example;

- a registrant who is employed by or practicing in association with another clinician, group, or clinic that is responsible for advertising on their behalf.
- a registrant who has engaged with a consultant, firm, or third party to advertise on their behalf.

Regardless of the extent of their involvement, the registrant is ultimately accountable to meet the expectations contained in this Practice Direction.

Advertising Expectations

Advertising associated with a registrant's practice is compliant with relevant legislation and standards.

1. Registrants are compliant with Section 76 of the *Regulated Health Professions Act* which states "No member or health profession corporation shall engage in advertising that is untruthful, inaccurate, or otherwise capable of misleading or misinforming the public."

2. Registrants ensure any advertising associated with their practice is compliant with any legislation that is relevant to advertising their practice. This may include, but is not limited to:
    a. the Food and Drugs Act,
    b. the Controlled Drugs and Substances Act,
    c. Canada's Anti-Spam Legislation,
    d. the Competition Act, and
    e. the Canada Consumer Product Safety Act.
3. Registrants ensure their advertising is compliant with the provisions in the Canadian Code of Advertising Standards.

Advertising associated with a registrant's practice demonstrates accountability:

4. When identifying themselves in advertising, registrants must ensure they use their first name, last name, professional designation, or protected title, as it is listed on Nurse Check.
5. When advertising related to a registrant's practice refers to education, credentials, or certifications (e.g. Foot Care Certification, Cognitive Behavioural Therapy Certification, master's degree), registrants must promptly provide proof of those credentials or certifications to clients, potential clients, or the College, when requested.
6. Registrants keep a record of any advertising associated with their practice for a period of five (5) years.
7. Registrants can provide credible evidence to support any claims made in advertising associated with their practice and do so promptly when requested by a client, potential client, or the College.

Advertising associated with a registrant's practice demonstrates honesty and integrity:

8. Registrants ensure advertisements do not contain (directly, indirectly, or by omission or implication) any inaccurate, deceptive, or misleading claims, statements, or messages. This includes:
    a. Advertising does not make any false claims.
    b. Advertising does not make any exaggerated claims.
    c. Advertising does not make any unsupported guarantees.
    d. The tone and content of the messaging contained in advertising does not trivialize or downplay the risk or seriousness of a proposed treatment or care plan.
    e. The tone and content of the messages contained do not encourage indiscriminate or unnecessary use of health care services.
    f. Any claims made about the effectiveness of a product or care includes a prominent statement to the effect of "individual results may vary."
    g. Visual messaging used in advertising (pictures, videos, graphs, infographics, tables) are not altered or manipulated to deceive, miscommunicate, or misinform the viewer.
    h. Advertisements must not misrepresent anything related to prices, payments, or deadlines.
9. Where photos or videos of people are used in advertising (for example in before/after comparisons or to illustrate results) registrants ensure that those photos or videos do not mislead the viewer. This means:
    a. Visual messaging used in advertising (pictures, videos, graphs, infographics, tables) are not altered or manipulated to deceive, miscommunicate, or misinform the viewer.
    b. If advertising includes photos or videos that depict clients the registrant did not treat, advertising must clearly state that the depicted client was treated by another provider.
    c. Photo and video editing software, and AI tools are not used in any way that misleads the viewer.
    d. Where photos or videos are used to illustrate results or effectiveness, there is a prominent statement to the effect of "individual results may vary."

10. Registrants ensure that any claims made in advertising associated with their practice are supported by evidence. This means:
    a. Any claims made about the effectiveness or success rate are accurate and supported by the preponderance of scientific evidence.
    b. Any claims made about the risks, side effects, or adverse events are accurate and supported by the preponderance of scientific evidence.
11. Registrants understand that soliciting testamonials may damage the therapeutic relationship. To protect the therapeuitc relationship, registrants:
    a. do not solict testamonials or online reviews from clients.
    b. do not use testimonials in advertising that comment on clinical aspects of their practice (assessment, diagnosis, treatment, or outcome).
    c. do not link to online reviews to their advertising.
12. Registrants do not advertise excessive inducements- such as two-for-one offers, flash sale promotions, or limited time offers which could unduly influence a client's decision-making or compromise informed consent.

Advertising associated with a registrant's practice demonstrates respect for privacy and confidentiality.

13. Registrants understand that using personal health information (of any kind) in an advertisement is a disclosure of health information. Before using personal health information in advertising, registrants ensure that, in so doing, they can comply with professional and legal obligations related to privacy, confidentiality, and disclosure of personal health information.
14. Before using videos or photographs of clients in advertising, registrants ensure:
    a. The client has provided written informed consent for the use of the video or photograph that will be used, where it will be published or posted, and any relevant details about the intended use case.
    b. The client understands that they can withdraw consent for use of the video or photograph at any point, at which time the registrant will immediately take all reasonable steps to remove the picture or video from the public's view.
    c. The client understands that once the picture is used in advertising, especially advertising done on websites or social media outlets, it may not be possible for it to be removed completely from the public's view.

Advertising associated with a registrant's practice upholds trust in the profession.

15. Registrants ensure that advertising associated with their practice demonstrates collegiality and respect for others by:
    a. Not engaging in advertising that denigrates, devalues, attacks, or disparages other professionals, clinics, practices, or products.
    b. Not engaging in advertising that compares the effectiveness of practice between individual providers.
    c. Not engaging in advertising that claims superiority over other professionals offering similar care or service.
    d. Not engaging in advertising that compares services, price, or ability of other healthcare providers, clinics, or groups.
16. Registrants do not use their protected title or association with the profession to advertise business interests which are not within the scope of practice outlined in the CRNM General Regulation. For more information, please review the document Is my practice considered registered nursing practice?
17. Registrants ensure that the tone and content of their advertising is professional, aligns with the Code of Ethical Conduct, and does not damage the reputation of the profession.
18. Registrants do not refer to the "College of Registered Nurses of Manitoba" nor "CRNM," nor any of the College's brand in any of their advertising.

Definitions

Inducement - Refers to any incentive or promotional offer intended to encourage a client to undergo a treatment or procedure. These inducements may be financial, material, or time-sensitive in nature. Inducements may compromise informed consent by pressuring clients into decisions that they haven't fully considered, blur the professional boundaries between healthcare providers and salespeople, and/or encourage unnecessary treatments, especially if clients prioritize value over medical need.

References

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College of Registered Nurses of Manitoba (2025). *Code of Ethical Conduct*. https://www.crnm.mb.ca/resource/codeofethicalconduct/

Government of Canada (1985). *Food and Drugs Act*. https://laws-lois.justice.gc.ca/eng/acts/f-27/page-1.html#h-234053

Government of Canada (2010). *An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act* (Canada's Anti-Spam Legislation.) https://laws-lois.justice.gc.ca/eng/acts/E-1.6/index.html

Government of Canada (1985). *Competition Act*. https://laws-lois.justice.gc.ca/eng/acts/c-34/fulltext.html

Government of Canada (2010). *Canada Consumer Product Safety Act*. https://laws-lois.justice.gc.ca/eng/acts/c-1.68/page-1.html

Government of Canada (2025). *Illegal marketing of prescription drugs*. https://www.canada.ca/en/health-canada/services/drugs-health-products/marketing-drugs-devices/illegal-marketing/prescription-drugs.html

Government of Manitoba (2018). *Regulated Health Professions Act*. https://www.gov.mb.ca/health/rhpa/

Resources

The following documents were considered in the creation of this practice direction:

Ad Standards (2025). *The Canadian Code of Advertising Standards*. https://adstandards.ca/code/the-code-online/

British Columbia College of Nurses and Midwives (2025). *Self-employed practice*

College of Nurses of Nova Scotia (2022). *Self-Employed Practice Guideline for Nurses*.

College of Nurses of Ontario (2025). *Advertising*

College of Physicians and Surgeons of British Columbia (2009). *Advertising and Communicating with the Public*

College of Physicians and Surgeons of Alberta (2021). *Advertising*

College of Physicians and Surgeons of Manitoba (2019). *Standard of Practice Advertising*

College of Registered Nurses of Alberta (2022). *Advertising Standards*

College of Registered Nurses of Newfoundland (2022). *Advertising Nursing Services*

College of Registered Nurses of Prince Edward Island (2024). *Practice Directive Advertising*

College of Registered Nurses of Saskatchewan (2024). *Advertising Nursing Services*