What Changed in 2025–26: New Advertising and Privacy Rules Your Dental Website Is Judged Against

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Four regulatory changes landed between September 2025 and December 2026 that directly affect what a dental practice website can say and show — cosmetic-procedure advertising, TGA enforcement priorities, doubled consumer-law penalties, and AI transparency in privacy policies. What each one means and what to check on your site this week.

What changed in 2025–26 — and what to check on your site this week

> This guide flags items for your own review. It is not legal advice, and reading it (or running our checks) does not determine whether your practice is compliant or non-compliant with any law or guideline. For specific concerns, get independent legal or regulatory advice.

Four separate changes landed between September 2025 and December 2026. None of them were aimed at dentists specifically — and that's exactly why dental websites keep tripping over them: the copy was written before the rules existed, and nobody has been back to look.

Here they are in date order, each with the practical check.

1. September 2025 — cosmetic-procedure advertising guidelines (and yes, veneers are on the list)

Ahpra and the National Boards' guidelines for practitioners who advertise **higher-risk non-surgical cosmetic procedures** took effect on **2 September 2025**. The list of higher-risk procedures explicitly includes **dental veneers**, alongside injectables and thread lifts.

For advertising those procedures, the guidelines require:

- **Real, unedited images only.** Filtered, airbrushed or otherwise enhanced photos should be replaced with unaltered ones — and "after" photos should be taken in similar conditions (lighting, angle, distance) to the "before".
- **A visible "results may vary" warning** wherever such imagery is used in advertising.
- **No influencer promotion.** The ban on testimonials from social-media influencers was strengthened — gifted-treatment posts promoted on your channels are a review item in themselves.

- **Protections for under-18s**, including targeted-advertising bans and a mandatory seven-day cooling-off period.

Check this week: open your veneers and smile-makeover pages. If there's a before/after gallery, ask three questions — are these images unedited, do they carry an individual-results warning, and is there any influencer or gifted content linked from the page? Remember the long-standing baseline still applies on top: testimonials about clinical outcomes have been prohibited in regulated health advertising under the National Law all along.

2. January 2026 — the TGA names cosmetic-procedure goods a priority

The Therapeutic Goods Administration's compliance principles for **2026–27** set out twelve priority focus areas, and one of them is **therapeutic goods used in cosmetic procedures**. Teeth-whitening gels, kits and strips are therapeutic goods — so the product side of your whitening page is regulated separately from the Ahpra side.

The TGA's advertising rules for therapeutic goods don't allow testimonials about the goods, and the regulator has flagged **fake or misleading reviews — including AI-generated "deep fake" endorsements** — as an enforcement focus, with particular scrutiny of websites and social media.

Check this week: look at your whitening page as two layers. The *service* (your clinical care) sits under Ahpra's advertising rules; the *product* (the gel, the branded kit you sell or name) sits under the TGA Advertising Code. Product testimonials, comparative product claims, and product before/afters are the items worth a careful look.

3. March 2026 — consumer-law penalties doubled

The penalties for misleading or deceptive conduct under the Australian Consumer Law were **doubled with effect from 28 March 2026** — for companies, now up to $100 million per contravention. The ACCC's 2026–27 priorities include manipulative and false practices in digital markets, and **online reviews** are squarely in scope:

- Offering an incentive for a review ("leave us a 5-star review for 10% off your next clean") risks being misleading conduct — incentives, if offered at all, must apply equally to negative reviews and be clearly disclosed.
- The health-booking sector already has its precedent: the Federal Court ordered HealthEngine to pay **$2.9 million**, partly over misleading patient reviews.
- For Ahpra-regulated practices there's a second layer: clinical-outcome reviews republished on your own website can read as testimonials under the National Law — even though the same reviews sitting on Google's platform are fine.

Check this week: any "leave us a review" card, SMS or email — does it offer anything in return? And if your website embeds a Google-reviews widget, check what the quoted reviews actually say: star ratings alone are lower-risk than quoted clinical praise.

4. December 2026 — your privacy policy must disclose automated decision-making

From **10 December 2026**, the Privacy Act's new transparency obligations require privacy policies to disclose the kinds of personal information used by **computer programs that make decisions significantly affecting individuals** — wording broad enough to capture AI-enabled systems, rule-based tools and automated assessments.

For a dental practice, think about what's already automated or about to be: an AI receptionist that triages "is this urgent?", a booking system that auto-allocates appointment types, a recall system that decides who gets contacted. If a tool like that uses personal information to make decisions that significantly affect a patient, your privacy policy will need to say so.

The OAIC is already running a compliance sweep of privacy policies, with compliance notices and civil penalties available for policies that don't meet the Act's requirements.

Check this week: find the date on your privacy policy. If it predates your booking system, your website chat, or any AI tool you've added — it almost certainly doesn't describe what those tools do with patient information. Listing your tools first (our free AI Tool Register template does this) makes the policy update mechanical rather than daunting.

The one-hour version

1. **Veneers/whitening pages** — unedited images, results-may-vary warnings, no influencer content (15 min).
2. **Whitening products** — no product testimonials or comparative product claims (10 min).
3. **Review prompts** — no incentives; check what any embedded reviews actually quote (10 min).
4. **Privacy policy** — date it, list your automated tools, flag the December 2026 disclosure deadline in your practice calendar (25 min).

Or let the machine do the first pass: our free website check reads your public pages against exactly these review triggers — testimonials and republished reviews, cosmetic-procedure imagery, inducements, whitening-product claims, and missing or thin privacy notices — and shows you what's worth a human look. Review triggers, not findings of non-compliance.

Sources: Ahpra's cosmetic-procedure advertising guidelines and September 2025 announcement; the TGA's 2026–27 compliance principles and testimonials guidance; the ACCC on online reviews; the March 2026 ACL penalty increase; and analysis of the Privacy Act automated-decision-making amendments. All accessed June 2026.

Disclaimer: Educational guidance only, not legal advice. This guide is intended for practice workflow education. Do not enter patient-identifiable information into public AI tools.

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