Website Advertising AI Review

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A practical checklist for reviewing dental website content for possible AHPRA advertising-risk items before publishing or updating.

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> This guide identifies possible advertising-risk items for your own review. It is not legal advice and does not determine whether a practice is compliant or non-compliant with Ahpra advertising requirements or any other regulation. If you have specific concerns, seek independent legal or regulatory advice.

> **NSW practices:** beyond Ahpra advertising rules, two privacy laws also apply to any patient information used in marketing — the Commonwealth *Privacy Act 1988* (APPs) and the NSW *Health Records and Information Privacy Act 2002* (HRIP Act, HPPs). General information, not legal advice.

> **The rules moved in 2025–26.** New cosmetic-procedure advertising guidelines (September 2025, dental veneers included), a TGA enforcement priority covering whitening products, doubled consumer-law penalties for misleading conduct, and a December 2026 privacy-policy deadline for AI tools. See what changed and what to check.

Why dental website advertising is regulated

Dental services are regulated health services in Australia. Advertising for regulated health services is governed by the *Health Practitioner Regulation National Law* and by Ahpra's advertising guidelines.

The Dental Board of Australia states that advertising a regulated health service must not be misleading or deceptive, must not use testimonials, must not create unreasonable expectations of beneficial treatment, and must not encourage unnecessary or indiscriminate use of health services. Ahpra's advertising guidelines also make clear that advertisers are responsible for the content they publish and should seek independent advice if they are unsure whether their content meets the requirements.

Social media pages, review profiles, Google Business profiles, and other digital channels used to promote a dental practice are also considered advertising for the purposes of these requirements.

This responsibility extends to content created by AI writing tools, marketing agencies, or automated platforms on the practice's behalf. Where an AI tool or agency produces copy that is then published

under the practice's name, the practice remains the advertiser for the purposes of these requirements. Such content should be reviewed against this checklist before publication regardless of who or what created it.

What this review checks

This checklist covers the most common possible advertising-risk areas. Use it to flag items that may benefit from a closer review — not to reach definitive legal conclusions.

1. Testimonials

Check	Guidance
Does the page include patient quotes, reviews, or stories about clinical outcomes or treatment results?	Ahpra's position is that testimonials or purported testimonials about regulated health services should not be used in advertising. This may include text, video, screenshots of reviews, or social media shares of patient comments about clinical outcomes. If real patient reviews, stories, or photos were fed into an AI tool or passed to a marketing agency to generate advertising copy, that is a separate possible issue: using patient information beyond the original treatment and billing purpose, and potentially disclosing it to overseas AI services. Remove patient-identifiable material from any copy-generation workflow before running this check.
Does the page display star ratings alongside clinical or treatment claims?	The combination of a rating and a treatment-outcome statement may be considered testimonial-adjacent and is worth reviewing.
Does the website link prominently to review platforms showing patient experience comments?	Linking directly to platforms where patient testimonials appear may be treated as use of testimonials in advertising. Consider how the link is presented.

2. Before-and-after content

Check	Guidance
Does the website display before-and-after images showing patient teeth, smiles, or faces?	Before-and-after imagery can create unreasonable expectations about outcomes. This is a commonly cited review trigger under Ahpra advertising requirements.
Does the website show composite or illustrative before-and-after graphics to demonstrate treatment effects?	Even composite or stock images used to imply typical outcomes may be a review trigger.

Check	Guidance
Are before-and-after images identifiable in any way — name, initials, location, or other details?	Any identifiable patient detail in published content is a separate privacy concern on top of the advertising-risk question. Remove identifying information.

3. Superlatives and superiority claims

Check	Guidance
Does the page use terms such as "best dentist", "number one", "the top dental practice in your area", "highest rated", or similar?	Claims of superiority or being the best in a category may be misleading if they cannot be substantiated, and are a common possible advertising-risk trigger.
Does the page make comparative claims about other practices — implying better outcomes, lower cost, or superior care?	Comparative claims that cannot be substantiated may be misleading.
Are there claims that position the practice as uniquely capable, uniquely safe, or the only appropriate choice?	These may create unreasonable expectations and warrant review.

4. Outcome guarantees and risk minimisation language

Check	Guidance
Does the page use language such as "guaranteed results", "guaranteed pain-free", "risk-free", "no downtime", or "100% success rate"?	Outcome guarantees and absolute risk-removal statements may create unreasonable expectations of beneficial treatment. These are among the most frequently cited possible advertising-risk items.
Does the page state or strongly imply that a particular treatment always works, never fails, or produces a specific result?	Even if expressed as a patient story rather than a direct claim, outcome certainty language is a review trigger.
Does the page downplay recovery, side effects, or the possibility of an unsatisfactory result?	Minimising or omitting the possibility of a poor outcome may be misleading.

5. Inducements and discount offers

Check	Guidance
Does the page offer discounts, special pricing, or time-limited promotions for dental treatments?	Inducements that could encourage unnecessary use of a health service may be a review trigger. Promotions should be reviewed for whether they could be read as encouraging treatment beyond clinical need.

Check	Guidance
Are the terms and conditions of any promotion clearly stated?	Promotions without clear terms may be misleading. Consider whether the terms are visible, complete, and not buried in fine print.
Does the page offer free consultations, gift cards, or other incentives tied to booking or accepting treatment?	These may be read as inducements depending on how they are presented.

6. Urgency language

Check	Guidance
Does the page use urgency phrases — "act now", "limited places", "today only", "don't wait" — near claims about health benefits or treatment outcomes?	Urgency language placed near health-benefit claims may encourage unnecessary use of health services, which is a review trigger under Ahpra advertising requirements.
Does the page imply that delayed treatment will cause significant harm in a way that is not clinically balanced?	Fear-based urgency combined with a service CTA may be read as encouraging unnecessary use.

7. Cosmetic and aesthetic treatment claims

Check	Guidance
Does the page make specific claims about the visual result of cosmetic or aesthetic procedures?	Cosmetic dentistry claims about appearance outcomes are subject to the same rules as other regulated health service advertising.
Does the page use celebrity comparisons, trending aesthetic references, or social media filter imagery to suggest typical results?	Imagery or comparisons that imply a specific achievable appearance may create unreasonable expectations.

8. Finance and superannuation messaging

Check	Guidance
Does the page discuss using superannuation to fund dental treatment?	Superannuation early release for dental treatment is tightly regulated and is a separate legal area. Copy in this area should be reviewed carefully.
Does the page offer or describe finance arrangements for dental treatment?	Finance terms and credit advertising have their own regulatory requirements separate from Ahpra advertising rules.

A note on AI-generated copy and privacy

This guide focuses on AHPRA advertising compliance, not privacy law. APP 8 (the Australian Privacy Principle covering cross-border disclosure) is largely out of scope here because the core advertising rules — testimonials, before-and-after content, outcome guarantees, inducements — do not depend on how the data flows, only on what was published.

However, there is one narrow angle where privacy is genuinely relevant: if real patient information (including identifiable reviews, patient stories, photos, names, or clinical details) is fed into a public AI writing tool or sent to an overseas marketing agency *in order to generate the copy*, that input step may create a possible purpose-use issue under APP 6 and a possible cross-border disclosure issue under APP 8, on top of the advertising-risk question. The rule from OAIC guidance is that patient information should not be entered into publicly available generative AI tools because of significant privacy risks. Before generating or reviewing copy with AI tools, check that no patient-identifiable information was used as input.

If patient information was used to produce the copy, seek separate independent privacy advice — that issue sits outside the scope of this advertising checklist.

Review workflow

Use this as a first-pass internal review — not a substitute for professional advice.

Step	Action
1	Walk through each section of this checklist for each page on the website.
2	Flag items that match the descriptions above as possible advertising-risk items for review.
3	For each flagged item, note the page URL and the specific wording or image.
4	Draft a safer alternative or remove the item.
5	If unsure whether a flagged item is a real concern, seek independent legal or regulatory advice before re-publishing.

Common safer rewrites

Original wording	Safer alternative
"Our patients love their pain-free results."	"We aim to keep patients comfortable. Your dentist will discuss what to expect for your treatment."
"The best cosmetic dentist in your suburb."	Remove or replace with a description of services and clinical focus areas.
"Guaranteed to transform your smile."	"Your dentist will discuss the treatment options, expected outcomes, risks and alternatives with you."

Original wording	Safer alternative
"Book before Friday for our special offer."	Review whether the promotion encourages unnecessary treatment. If it remains, ensure full terms are clearly stated.
"See our amazing before-and-after results."	Consider replacing with a description of the procedure, what it involves, and what to discuss with your dentist.
"Pain-free, risk-free dentistry."	"We work to keep you comfortable. Your dentist will explain the procedure, recovery and any risks before you decide."

Note: these alternatives are starting points only. Review them before use.

Red flags — high-review items

The following items should be treated as high-priority review triggers:

- Patient testimonials or quotes about clinical outcomes anywhere on the site
- Before-and-after photos or composites showing patient results
- Any absolute outcome guarantee ("will", "always", "100%")
- Urgency language tied to a health benefit claim
- Promotions that do not include clear terms and conditions
- Superannuation or finance copy that has not had separate legal review
- Any identifiable patient information in published content
- Copy produced by an AI tool or agency where patient information may have been used as input — review the source of the content, not only the output

Minimum review practice

Before publishing or updating website content, the practice owner or a nominated staff member should:

1. Check new content against this guide — including content produced by AI tools or marketing agencies on the practice's behalf.
2. Flag anything that matches the review triggers above.
3. Confirm that no patient-identifiable information was used as input to generate the copy.
4. Seek independent advice on any item that is unclear.
5. Remove or rewrite flagged items before publishing.
6. Keep a record that the check was done and when.

This does not guarantee compliance. It is a practical first step.

This guide flags possible review triggers. It is not legal advice and does not determine compliance. Seek independent legal or regulatory advice for specific situations.

Sources: Ahpra advertising guidelines · Ahpra testimonial guidance · Dental Board of Australia — advertising a regulated health service

If an agency publishes for you

Most advertising-risk wording arrives via a marketing agency, not the practice. Pin down who can publish what — and who reviews AI-written copy — with the one-page Marketing Agency & AI Governance Checklist (free, printable).

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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