

Advertising guidelines consultation summary report

Introduction

This report summarizes the feedback received during Technical Safety BC's [engagement with licensed contractors on legislative changes](#) regarding advertising practices.

The goal of the engagement was to gather input from the contractor community to inform how Technical Safety BC will support the implementation of these changes in a practical, clear, and feasible way.

We specifically consulted on the following:

- forms of advertising to be included in the guidelines;
- format of licence number to include in advertising;
- phrasing of the guidelines;
- time needed to comply with the guidelines;
- compliance and enforcement management;
- communication of the changes to licensed contractors and the public; and
- access to guidelines and related resources.

Background

This change was enacted to fill an unintended gap in legislation that enables unlicensed contractors to advertise the provision of regulated services without penalty. Other professional and trades organizations deter unlicensed/qualified professionals from advertising regulated services.

While prior to 2000, the Safety Standards Act and related technology regulations had addressed these scenarios, over time gaps have developed as regulations have evolved. The process began in 2018 to reinstate the rules in a way that created more value for the safety system.

This change was requested by licensed contractors to:

- deter unlicensed contractors from advertising their services;
- educate the public about the importance of licensed work and support them in finding contractors; and
- better enable Technical Safety BC to initiate compliance and enforcement activity against unlicensed work.

The legislative changes also present an opportunity for Technical Safety BC to increase brand recognition and to emphasize the value of licenced contractors to the public.

Process and participation

Technical Safety BC consulted on these changes with industry between April 11, 2022 and June 10, 2022.

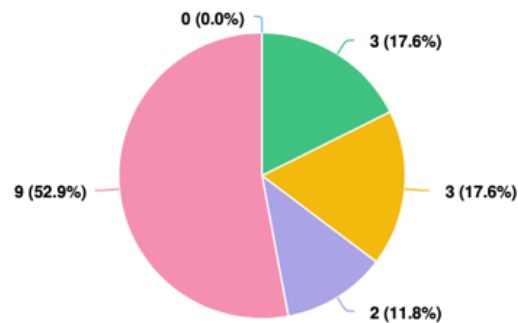
Digital engagement

We posted the opportunity to participate on Technical Safety BC's Engage website and invited over 16,000 licensed contractors and industry representatives to participate. The consultation was promoted through an email campaign directed at licensed contractors

subscribed to receive information from Technical Safety BC. By the end of the engagement period, the Engage webpage had been viewed by **over 521 unique visitors**.

66 participants engaged in the survey. Please see the detailed [survey report on the Engage page](#).

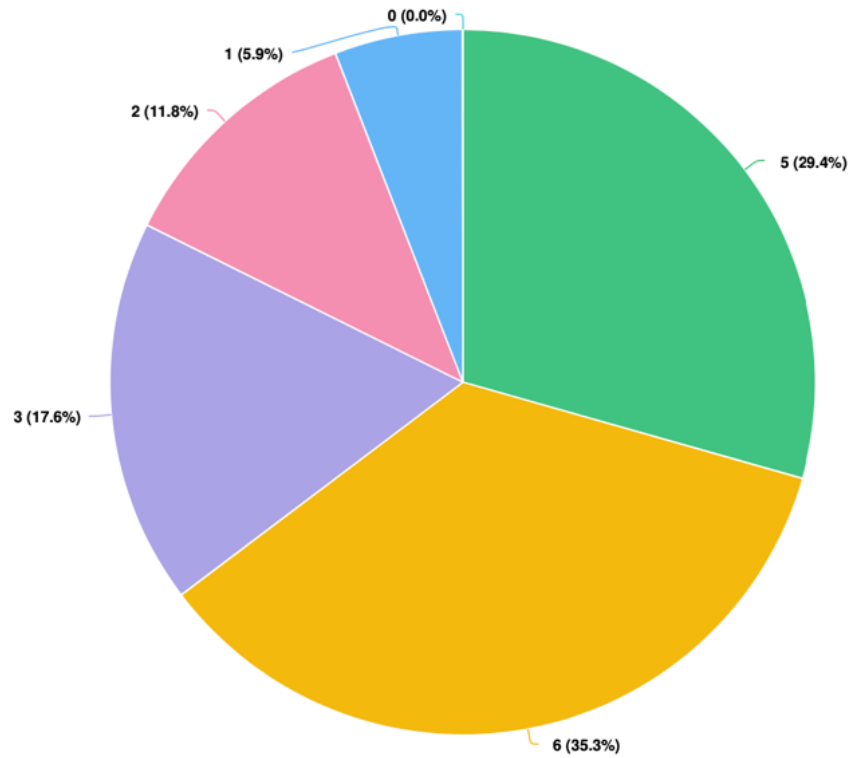
Q2 Approximately how many years have you held a contractor's Licence from Technical Safety BC?



Question options

1-5 6-10 11-20 20+ Less than 1

Q3 What is the approximate size of your company?



Question options

- Just me! (one person)
- 2-10 employees
- 11-50 employees
- 51-200 employees
- 200+
- Other (please specify)

Focus group engagement

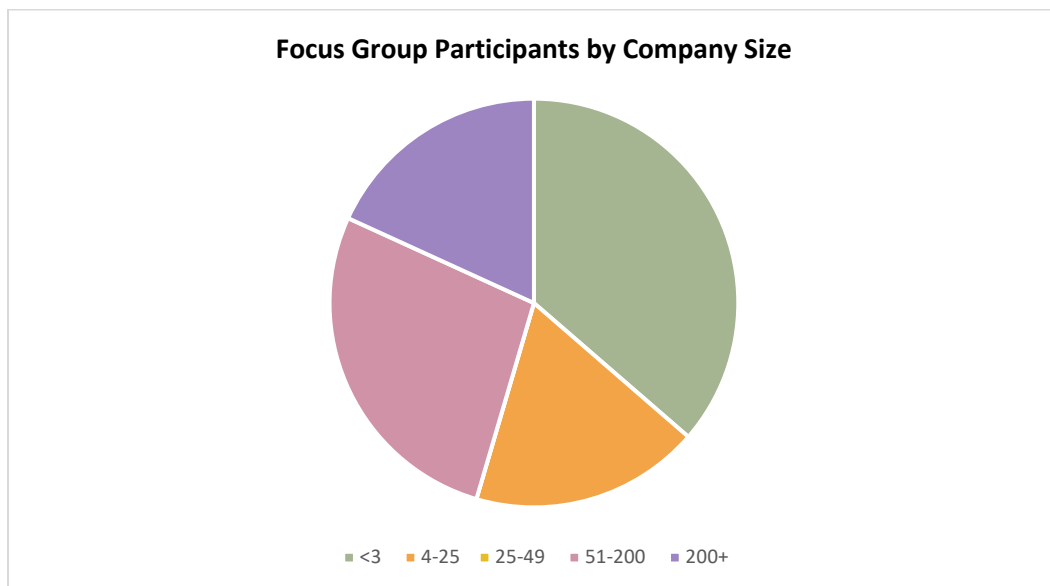
We hosted a series of three 1.5-hour online focus groups to gather more in-depth feedback and perspectives from contractors. In total, 24 contractors signed up and **a total of 11 contractors participated.**

We had wide representation across geographic regions, and participation across technologies was as expected given the relative importance of these changes for electrical, gas, and boiler contractors, who sell to the public more than contractors for elevating devices, passenger ropeways, and amusement devices.

Over 40% of contractors that participated had less than three staff, many were sole proprietors. Those companies tend to do very little advertising and rely on word of mouth for most of their referrals. Many of the focus group participants have held their licences for over 20 years and remember when publishing their Technical Safety BC licence number was required — in fact some were not aware that this was no longer a requirement and were pleased to hear it will be coming back.

Large companies (over 200 staff) identified adding licence number decals to their vehicles as the biggest impact of the changes. However, given that they often have fleet management services, they thought this could be done relatively easily and would be seen as a cost of doing business.

Medium-sized companies tend to have a range of digital and traditional advertising channels and some administrative support that will help them to align with the guidelines.

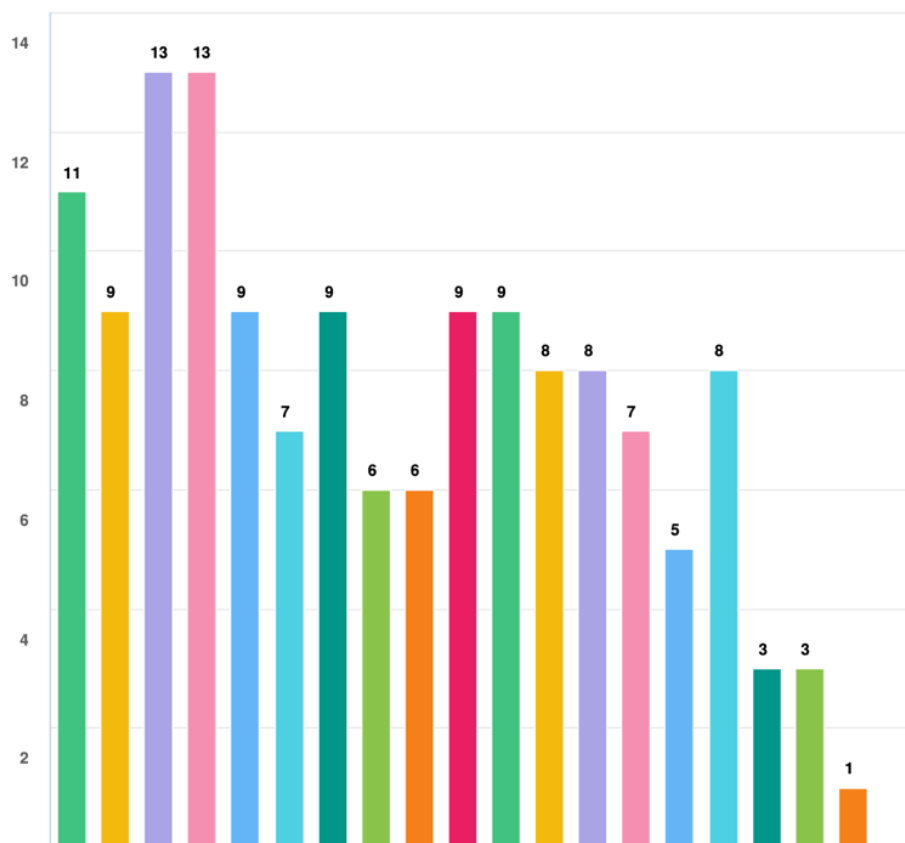


What we heard

Key findings

- Contractors are overwhelmingly supportive of these changes, as it presents an opportunity for licensed contractors to distinguish themselves from unlicensed contractors individually, and to increase the profile of the community overall.
- Contractors see this as an opportunity for Technical Safety BC and the public to identify unlicensed contractors more easily.
- Many contractors that engaged with us have few advertising activities and feel that the guidelines may not impact them greatly.
- Contractors were supportive of all advertising channels being captured in the guidelines.
- Contractors felt they needed a shorter amount of time to comply with digital advertising requirements than other forms of advertising.

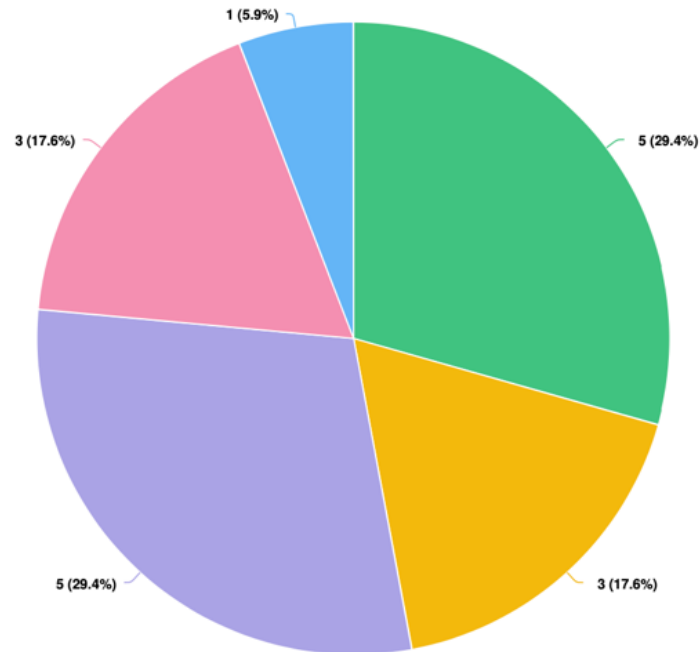
Q7 What forms of advertising should be INCLUDED in the Advertising Guidelines?



Question options

- Online marketplaces (e.g. Craigslist, Kijiji)
- Social media accounts
- Online advertisements (e.g. Google Ads)
- Company website
- Online directories (e.g. Yelp, Google My Business)
- Email signatures
- Company marketing emails
- Company branded vehicles
- Storefronts (e.g. storefront signage, door signage)
- Business cards
- Quotes
- Invoices
- Company stationery (e.g. letterhead)
- Brochures, handbills, door knockers, mailers
- Job site signage (e.g. fencing signs)
- Advertisements in publications (e.g. industry newsletters)
- Radio advertisements
- TV advertisements
- Other (please specify)
- Company branded clothing

Q9 How much time might your company need to be able to comply with the guidelines given your current scope of advertising activities?



Question options

● Less than 2 months ● 2-3 months ● 4-6 months ● 7+ months ● Unsure yet

Engagement element	What we heard	Technical Safety BC action
Forms of advertising	• Most contractors found all forms of advertising to be relevant for inclusion and indicated that the same guidelines should apply to all licensed contractors, regardless of size, geography, or technology. • Technical Safety BC needs to be clear that word of mouth referrals are exempt from advertising guidelines. • Many contractors opt not to brand their vehicles, as they get broken into for tools/parts etc. Contractors want to continue to choose whether they brand their vehicles. • Large contractors that sell B2B are already used to publishing their licence number as a requirement of most tenders. • Technical Safety BC needs to consider how the guidelines might apply to social media posts (vs. profiles). • Some contractors sponsor teams or events. They need clarity on how sponsorship materials vs. clothing are addressed under the guidelines.	• Update the draft guidelines to address sponsorship, dealers, general contractors, agency relationships, program membership. (complete)
Format of licence number	• Contractors want a practical character length that addresses restrictions (especially in digital advertising). • Contractors feel that there is not enough public brand awareness of either “Technical Safety BC” or “TSBC”. • Some contractors feel that the proposed licence number format “Technical Safety BC LEL123456” is “unworkable” from a design perspective (e.g., legibility on a business card with long string of text). • Many contractors already use their licence number in advertising materials due to the regulations that used to be in legislation. • Contractors would like to see something more professional and visual to support the display of licence number. They felt that publishing a licence number on its own doesn’t have a lot of value, and could be enhanced by a recognizable visual element (e.g., TSBC logo or a likeness of the logo) that can create some brand awareness. • Some contractors have multiple licences and indicate that publishing all the licence numbers in all advertising would look “ridiculous” and confusing for the customer.	• Consider viability of decals/seals to support this change and other brand awareness initiatives in the future.

Implementation phasing	- Contractors believe that some changes can be implemented quite quickly, but in areas where the contractor has already incurred an expense, they may need time (e.g., stationery, job site signage, vehicle branding). Easier to make these changes over time, so contractors can use up existing stock. - Contractors said that phasing in the requirements by type of advertising channel would be very helpful. - Most contractors surveyed indicated that 2-3 months would be sufficient for implementation. - Implementing digital advertising requirements would take the least amount of time.	Identify potential phasing for the guidelines
Managing compliance and enforcement	- There needs to be a process to hold licensed and unlicensed contractors accountable for non-compliance. - Contractors feel that Technical Safety BC's enforcement activity is hidden. Contractors would like to see more information shared with them on enforcement activity as a result of this change. - Contractors aligned strongly with the idea that Technical Safety BC would expend its compliance and enforcement resources to identify unlicensed contractors advertising illegally. - Contractors felt that enforcing licensed contractor compliance with the guidelines would come secondary to identifying and investigating unlicensed contractors; however, contractors felt that the more contractors that participated, the more value would be created for the contracting industry, Technical Safety BC, and the public. - Focus on a key set of requirements vs. every piece of paper. - Compulsory trades come with 150 new enforcement officers that will enforce that workers must be within the ITA apprentice system or a licensed contractor (Skilled Trades BC). Is there an opportunity to collaborate with enforcement done by Skilled Trades BC?	Incorporate learnings into Compliance & Enforcement planning for this initiative
Communicating the changes	- Technical Safety BC's existing communication channels are sufficient for contractors to learn about the changes. - Contractors want to see more of a public advertising campaign around the value of licensed contractors, the risk of using unlicensed contractors and how to identify licensed contractors from their advertising.	Prepare external communication plan that includes at least the website, online services, email and

- Contractors felt that they were a good source of information for their clients and the public.
- Education to consumer on unlicensed vs. licensed contractors is essential to effective change. Contractors want Technical Safety BC to do more advertising on hiring a licensed contractor and help the public to identify and understand why they shouldn't hire unlicensed contractors.
- Most contractors in the focus groups were not members of associations and do not view association communications as something that would be helpful to them.
- Consider publishing an exhaustive printable list of licensed contractors (vs. the lookup). Consumers would be able view anyone that has a licence.
- Suggestion to get the message out to the BC public sector (e.g., crowns, school districts, and municipalities) about the risks of hiring unlicensed contractors and ask them to add a line to their tenders for the Technical Safety BC contractor licence number(s) as mandatory criteria for submitting tenders.
- Technical Safety BC work with insurance companies (e.g., ICBC) and make them aware of unregulated work (i.e., don't insure contractors that are doing unregulated work) They have to insure their vehicles but won't likely insure for commercial use. Consider a fine/fee on insurance renewals to reinsure vehicles. CGL insurance should ask for licence number or not insure companies.

contractor information sessions.

- Investigate opportunity to create a communications campaign to raise public awareness of how to identify a licensed contractor through their advertising.

Accessing the guidelines

- Contractors would like the guidelines and other information to be available as downloadable content on the website and through online services.
- Contractors would like notifications of the phased guideline implementation dates through online services would be helpful.
- Contractors would like virtual information sessions that provide details on how to comply with the guidelines.

- Add information sessions to the implementation plan
- Include online services notifications as guidelines are phased in
- Provide guidelines on website and include a downloadable version.

Next steps

Thank you to everyone who provided feedback.

The next steps in the process are for Technical Safety BC to:

- update and finalize the guidelines, including phased implementation dates; and
- develop an implementation and communication plan to support sharing information with contractors and the public.

Questions and comments? Contact us at engage@technicalsaftybc.ca