

Prescription Only Medicines



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What are the Learning Outcomes for today's training?

The aim of today's training is to equip you with greater knowledge and a wider understanding of the advertising rules on cosmetic interventions including on social media, so your members can run effective and compliant campaigns.

By the end of today's session you will feel confident in:

- 1 Explaining** the position in relation to Prescription-only Medicines and how it applies to different advertising mediums
- 2 Identifying** the different positions where a combination of POM and non-POM treatments are available
- 3 Understanding** the restrictions on the use of celebrities, influencers and health professions in ads for medicines.
- 4 Identifying** where there is need for substantiation
- 5 Identifying** the potential risks associated with social responsibility issues
- 6 Identifying** the potential risks associated with advertising on social media



What will we be covering today?

- 1 Key principles
- 2 Celebrities and health professionals
- 3 Targeting
- 4 Social responsibility
- 5 Social media ads
- 6 Efficacy
- 7 Weight Loss Injections



Key principles



What do the rules state?



12.12

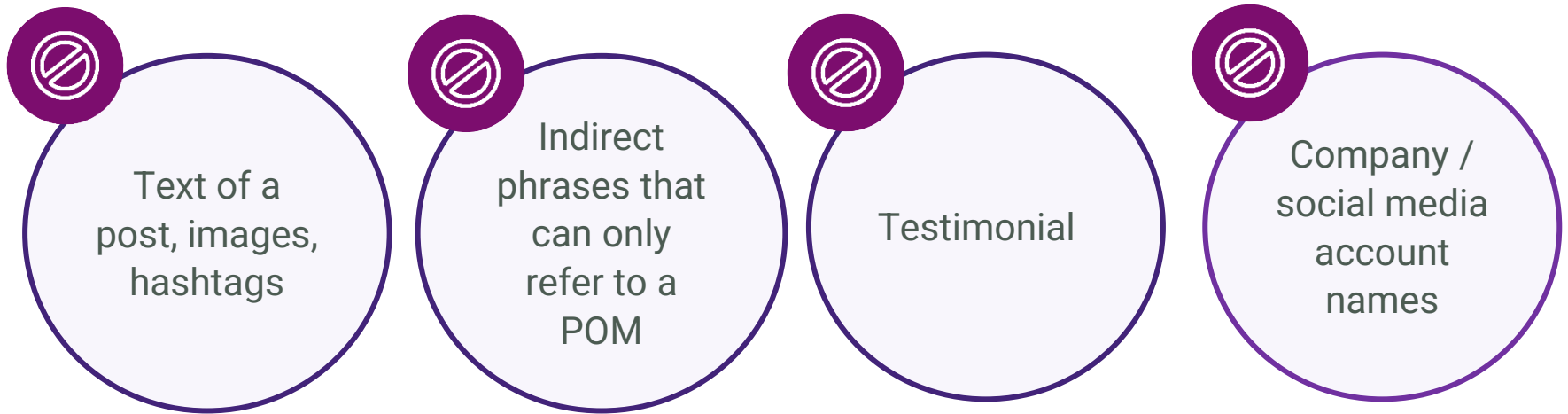
Prescription-only medicines or prescription-only medical treatments **may not** be advertised to the public.

The **Human Medicines Regulations 2012** prohibit the publishing of “an advertisement that is likely to lead to the use of a prescription-only medicine”



POMs:

Direct & Indirect references



Beauty Boutique Aesthetics 2019



beautyboutiqueaesthetics • Follow

beautyboutiqueaesthetics We all know that one person don't we 🙄🙄♀️ -

I always recommend clients to question who their treatments be administered by - a registered nurse NMC qualified or a Beauty technician? Many beauty technicians may be more than qualified, but always ask yourself, can they administer emergency drugs if the client has an adverse effect? The answer is no. 🙄♀️ -

We finally have the option to pay by finance so if you would like a to pay in weekly or monthly installments before you have your treatment with us - not a problem! I have had a lot of questions lately regarding finance due to how expensive some of the packages of 3 or more treatments are. This is a more affordable alternative. But Please



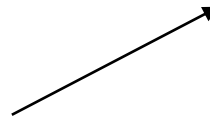
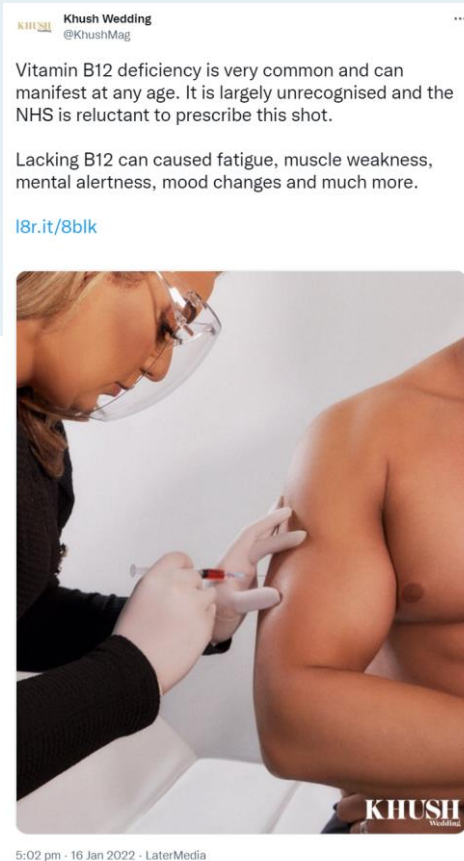
29 likes

DECEMBER 22, 2013

Log in to like or comment.



MOS Media Ltd 2022



Khush Wedding
@KhushMag

Vitamin B12 deficiency is very common and can manifest at any age. It is largely unrecognised and the NHS is reluctant to prescribe this shot.

Lacking B12 can caused fatigue, muscle weakness, mental alertness, mood changes and much more.

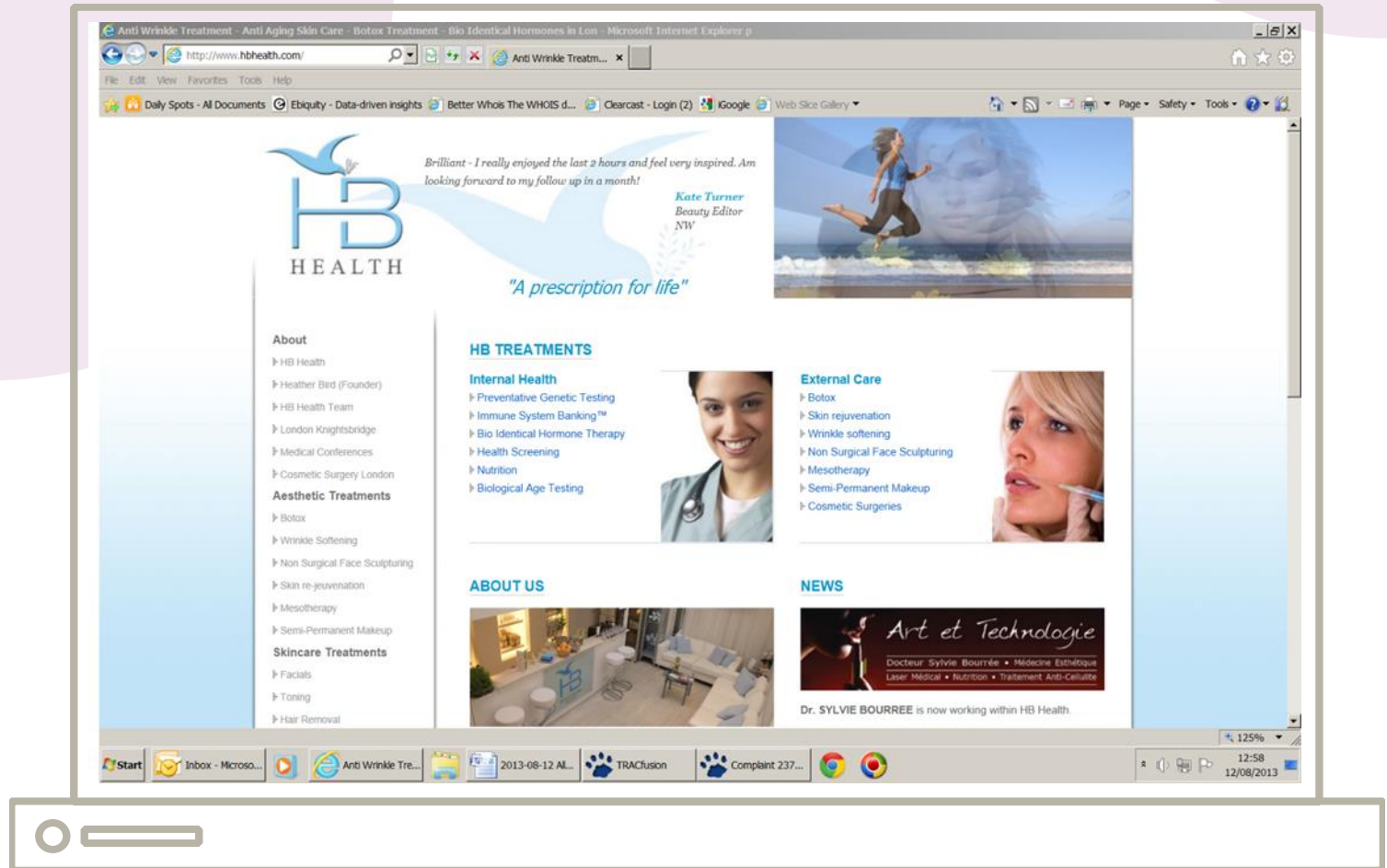
l8r.it/8blk



Websites



Homepage



Consultation



Get started Choose your treatment plan



Used for receding hairlines and bald spots

Topical Finasteride with Minoxidil

2-in-1 topical solution applied twice daily

Combines two ingredients into a single solution for treating overall thinning hair - no pills required

Monthly £44/month	Every 3 months £37/month ^{-15%}
----------------------	---

Since results take some time, consider a 3 month order

Get 3 Months For £111 £55

£111 every 3 months after
Subject to clinician approval
Cancel any time



Used for overall thinning hair

Finasteride & Minoxidil

Prescription tablet & alcohol-free topical solution

This combination is used for reducing overall hair loss and increasing hair regrowth

Monthly £49/month	Every 3 months £42/month ^{-14%}
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Since results take some time, consider a 3 month order

Get 3 Months For £126 £63

£126 every 3 months after
Subject to clinician approval
Cancel any time



Used for receding hairlines

Finasteride

Prescription tablet taken once daily

Clinically proven to block DHT and reduce hair loss along the hairline, crown and vertex

Monthly £34/month	Every 3 months £26/month ^{-18%}
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Since results take some time, consider a 3 month order

Get 3 Months For £104 £54

£84 every 3 months after
Subject to clinician approval
Cancel any time

Online consultation

Visits are free

When it comes to tackling hair loss, it's best not to go it alone. We connect you to a UK-registered prescriber who assesses your case and recommends the best course of treatment.

If everything looks good you can start your treatment in as little as 48 hours. Even better, you can always reach out to your Hair Specialist if there's something you're unsure about. Help is never more than a click away.

Combined Topical Solution

Topical Finasteride with Minoxidil

Start for £22/month

The UK's first topical solution combining both Finasteride and Minoxidil. Our custom 2-in-1 formula makes the most effective hair loss treatment regime quicker and easier than ever. Free of alcohol and propylene glycol.

- Synergistically combines Finasteride and Minoxidil to reduce DHT production and improve blood flow to hair follicles
- Effective for both receding hairlines and thinning on the crown
- Lower risk of side effects than Finasteride tablets

[Full medicine facts >](#)



Active ingredient in Rogaine

Minoxidil Solution

Start for £10/month

An easy-to-use solution which you apply to your scalp twice a day. Unlike other brands, our unique extra strength formula is free from harsh chemicals like ethanol and propylene glycol, which means it's kinder to your scalp and less likely to dry it out.

- Combats hair loss by improving blood supply to the hair follicles
- Most effective on the crown, regrows hair and prevents bald spots
- Studies show Minoxidil is effective for 7 out of 10 guys

[Full medicine facts >](#)



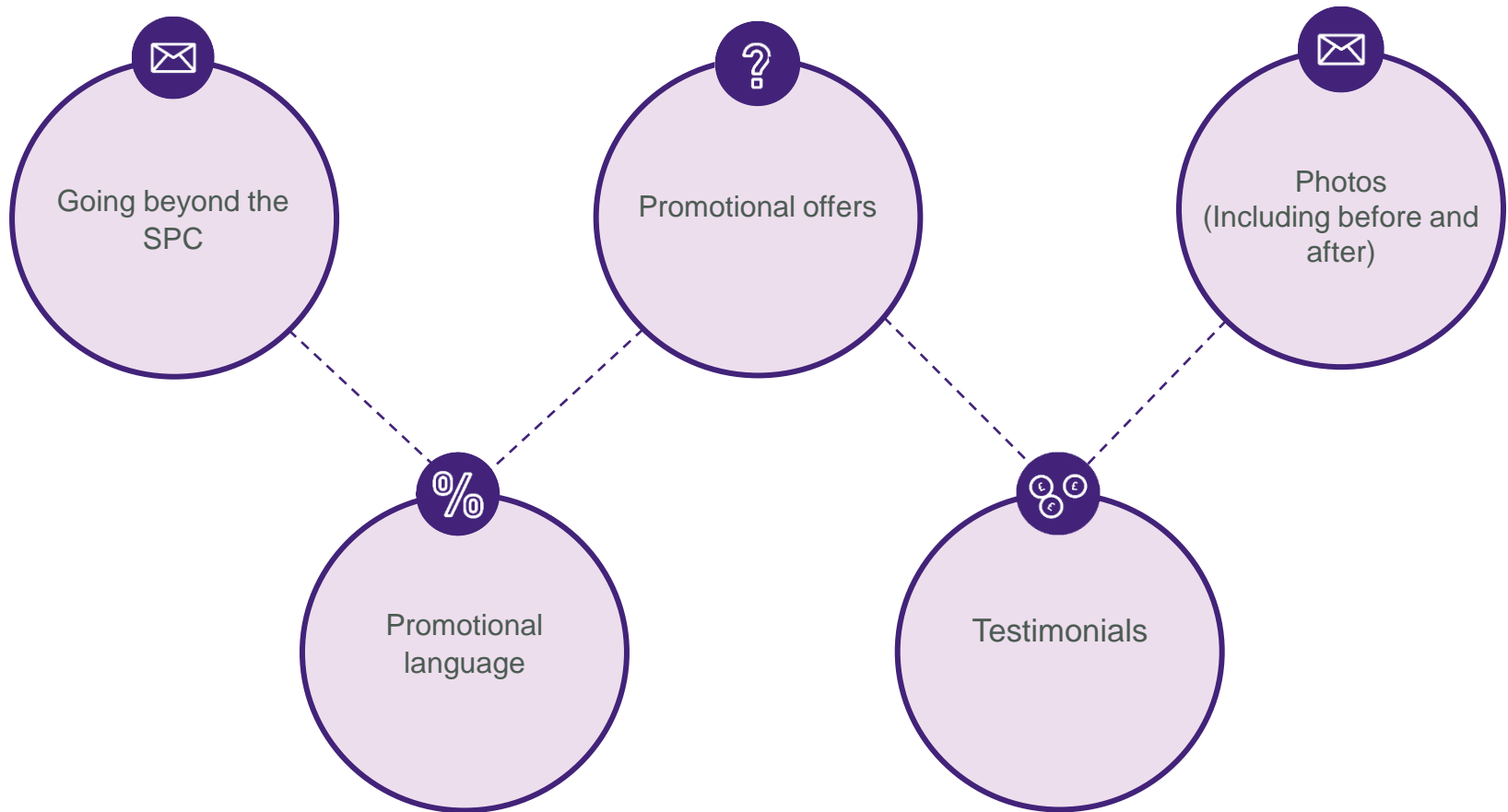
Factual Claims



- Reflecting the SPC
- Information about general experience
- Price information
- Clinic testimonials



Promotional claims



Price lists



Treatment	Price
Fillers	£20 per treatment area
Botox	£50 per treatment area
Microdermabrasion (facial)	£40
Threading	£150 per side

Treatment	Price
Fillers	£20 each area of 3 areas for £50
Botox	£50 per treatment area or 2 areas for £80
Microdermabrasion (facial)	£30 until 5 April
Threading	£150 per side

Treatment	Price
Fillers	£20 each area or 3 areas for £50
Botox	20% all treatments*
Microdermabrasion (facial)	£30 until 5 April
Threading	£150 per side

*until 5 April 2023

10% off all listed prices until 5 April 2023*.



Treatment	Price
Fillers	£20 per treatment areas
Botox	£50 per treatment area.
Microdermabrasion (facial)	£30
Threading	£150 per side



*price discounted at checkout.



Key things to remember

- 1 Don't reference POMs on the homepage.
- 2 Promote the consultation – not the treatment.
- 3 Only reference POMs after details of the consultation.
- 4 Only present POM as a **potential outcome** of the consultation.
- 5 Restrict claims to factual information that reflects the SPC.
- 6 No promotional claims, images or price offers.





Any questions?



Celebrities and health professionals



What do the rules state?



12.18

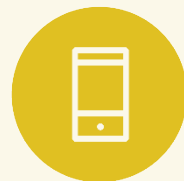
Marketers **must not** use health professionals or celebrities to endorse medicines.

“Advertisements to the general public should not contain material which refers to recommendations by scientists or healthcare professionals, or which refers to recommendations by celebrities who, because of their celebrity, could encourage consumption of products.”



Sanofi UK

2019



thismamalife • Follow

thismamalife [AD] Sleep. Who needs more of it? I'm really lucky in that I don't actually need a lot of sleep to get by and manage to cram all sorts into my evening, being the night owl I am. Every now and again though, daily life can get a bit overwhelming and I often find it's my sleep that ends up suffering. I end up going to bed even later than I usually do and am not able to fall asleep. The worry of not sleeping then adds to it all and I end up a complete and utter zombie!! Last time this happened I tried out Phenergan® Night Time, which really helped. It is a pharmacy only, short term solution to insomnia for adults which works by inducing a sleepy effect thanks to its active ingredient, promethazine hydrochloride, helping you to sleep through the night. Do you guys fall asleep easily or are you night time over



528 likes

3 DAYS AGO

Add a comment...



Press coverage



Anyone with at least 30,000 followers on social media is officially a 'celebrity', UK advertising regulator reveals

By Joe Pinkstone For Mailonline
10:28 04 Jul 2019, updated 11:28 04 Jul 2019



Anesis Spa

2012



Botox Treatments In Clapham London

http://www.anesis.uk.com/botox-clapham-london

Readed Google

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ANESIS SPA

Facial Rejuvenation Clinic - Botox Treatments

Available now at our Clapham Branch in London


Dr. Natalia (Natty) Burgess BDS is a qualified Dental Surgeon practicing both in Devonshire Place (near Harley Street) and in South London. She is a Clinical leader for King's College Hospital London Dental students, and is an Undergraduate Seminar leader for King's College London Medical students.

Natty is specially qualified in facial injection rejuvenation treatments and loves seeing the renewed confidence that people gain from the results.

Natty says "Facial injection rejuvenation treatment is not about "stopping facial expression" or "freezing the face". Much more like an artist, it must be undertaken in a highly skilled manner recognising the individuality of each patient. The goal is to gently slow down and/or reverse much of the visual impact of wrinkles appearing on the face over a number of years, and can offer a long term solution to these issues."

"When applied with the care and attention of an expert, patients will enjoy a greatly rejuvenated confidence both privately, and in their public appearance."

"I am absolutely delighted to be working in the Facial Rejuvenation Clinic at the Anesis Spa and look forward to meeting you soon."



Forehead Wrinkles (Forehead)

1504 12/04/2012



Targeting

What do the rules state?



Cosmetic interventions must not **be directed at those aged below 18 years** through the **selection of media or context** in which they appear. Cosmetic interventions mean any intervention, procedure or treatment carried out with the primary objective of **changing an aspect of a consumer's physical appearance**. This includes **surgical and non-surgical interventions**, both **invasive and non-invasive**. This does not include cosmetic products





Any questions?



Social Responsibility





Key principles:



Communications must be prepared with a **sense of responsibility** to consumers and to society.



Don't put consumers under **undue pressure**.



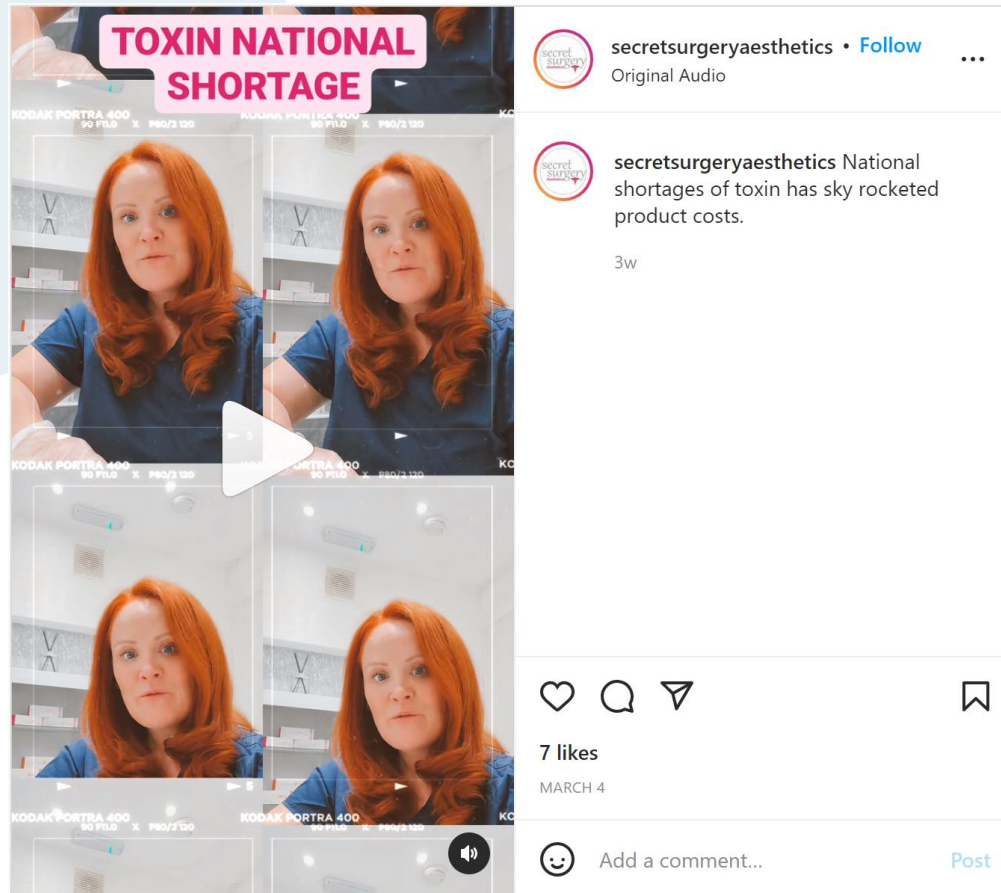
Don't exploit **insecurities**.



Do not use **degrading, objectifying or gender stereotyping imagery**, or create pressure to conform to an idealised gender stereotypical appearance.



Secret Surgery Ltd 2022



Royal Tunbridge Wells Skin Clinic 2018



We understand, it's concerning, but Dermal fillers are very quickly becoming commonplace as getting your hair done these days and even more so within the younger age group.

Is your daughter beginning to take an interest in LIP FILLERS?

Recently, we have seen an increase in young girls visiting our clinic for procedures such as Dermal Filler. In many cases, these girls have been brought in by their own mothers, who would rather help them find somewhere safe and suitable with experienced and accredited practitioners than simply telling them "no" and letting them go behind their backs, blindly searching for the cheapest practitioner without realising the risks involved with these types of procedures.

Of course, it's important to teach your daughter that she's beautiful both inside and out and that everybody has imperfections. However, it's also important to teach them about the dangers that can be involved with cosmetic enhancements if they aren't carried out by a suitable practitioner – and if she's thinking about getting Dermal Fillers

in her lips it's important that she can talk about it openly and be guided in the right direction.

Education is key when it comes to cosmetic enhancements which is why we offer complimentary consultation for mothers and their daughters – so together you can discuss your concerns with an experienced professional.

- ✕ GET HONEST, EXPERT ADVICE FROM A HIGHLY EXPERIENCED MEDICAL PROFESSIONAL.
- ✕ DISCUSS YOUR CONCERNS.
- ✕ EDUCATE YOUR DAUGHTER ABOUT THE DANGERS THAT CAN BE INVOLVED WITH COSMETIC ENHANCEMENTS IF THEY AREN'T CARRIED OUT BY A SUITABLE PRACTITIONER.

complimentary consultations available visit: www.rtwskin.co.uk or call 01892 22 22 22

AESTHETICS | DERMATOLOGY | ADVANCED LASERS | TRAVEL

01892 22 22 22
rtwskin, Cobden House Medical Centre, 25 London Road, Tunbridge Wells, Kent

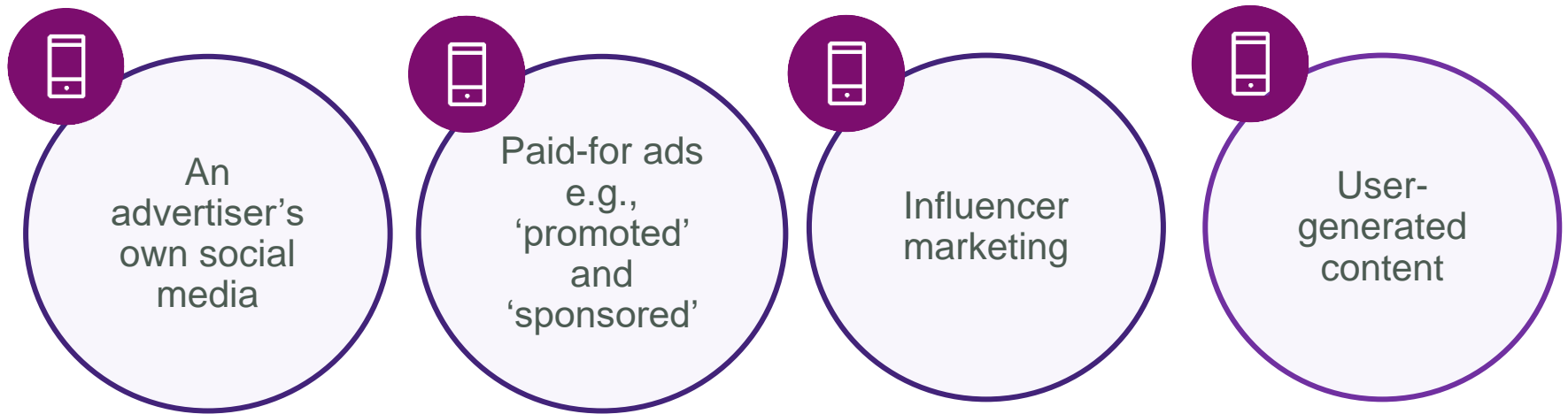
www.rtwskin.co.uk



Social Media



What counts?



Efficacy Claims



What do the rules state?



3.1

Marketing communications must not materially mislead or be likely to do so.

3.7

Before distributing or submitting a marketing communication for publication, marketers must hold documentary evidence to prove claims that consumers are likely to regard as objective and that are capable of objective substantiation. The ASA may regard claims as misleading in the absence of adequate substantiation.



What do the rules state?

12.1

Objective claims must be backed by evidence, if relevant consisting of trials conducted on people. Substantiation will be assessed on the basis of the available scientific knowledge.

Medicinal or medical claims and indications may be made for a medicinal product that is licensed by the MHRA, VMD or under the auspices of the EMA, or for a CE-marked medical device. A medicinal claim is a claim that a product or its constituent(s) can be used with a view to making a medical diagnosis or can treat or prevent disease, including an injury, ailment or adverse condition, whether of body or mind, in human beings.

Secondary medicinal claims made for cosmetic products as defined in the appropriate European legislation must be backed by evidence. These are limited to any preventative action of the product and may not include claims to treat disease.



Key things to remember

1

Ensure you hold adequate evidence to support claims.

2

Ensure that evidence is of suitable quality

3

Don't exaggerate the effects of a product.

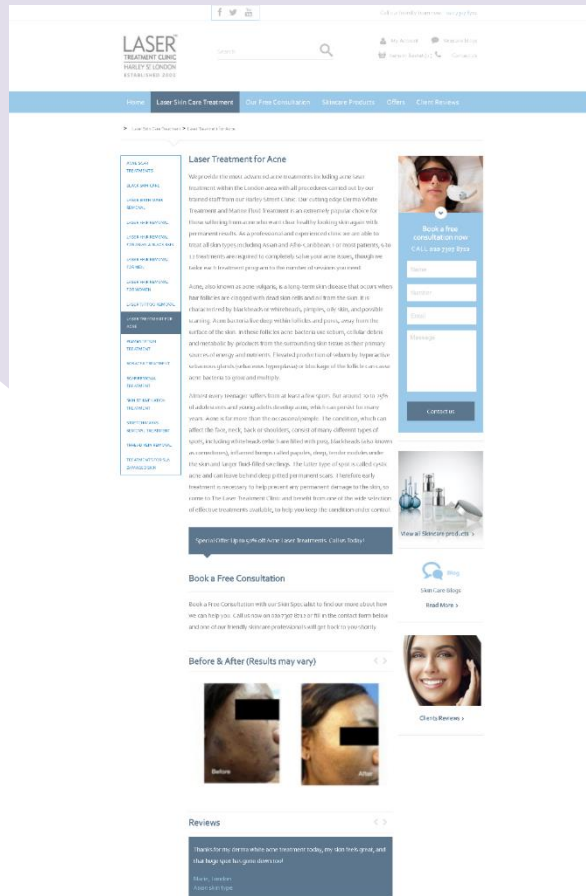
4

Testimonials alone do not constitute substantiation



The Laser Treatment Clinic Ltd

2018



Before & After (Results may vary)



Weight loss injections



Key principles

13.9 - Marketing communications must not contain claims that people can **lose precise amounts of weight within a stated period** or, except for marketing communications for surgical clinics, establishments and the like that comply with rule 12.3, that **weight or fat can be lost from specific parts of the body**.

13.10 - Claims that an individual has lost an exact amount of weight must be compatible with **good medical and nutritional practice**. Those claims must state the period involved and must not be based on unrepresentative experiences. For those who are normally **overweight**, a rate of **weight loss greater than 2 lbs** (just under 1 kg) a week is **unlikely to be compatible** with good medical and nutritional practice. For those who are **obese**, a rate of **weight loss greater than 2 lbs** a week in the early stages of dieting **could be compatible** with good medical and nutritional practice.



Skinny Clinic

2020



skinnyclinic_

Follow

3,458 posts

5,579 followers

3,405 following

Skinny Clinic

♥ Weight Loss 📏

♥ Medically Certified 🧑🏻💊

♥ UK Next Day Delivery 🇬🇧

♥ 24/7 Support and Advice 🕒

♥ Lose 11-13 lbs in 3 weeks 😊

♥ Website 🖱️

www.skinnyclinic.co.uk



skinnyclinic_

London, United Kingdom



Can't believe I've put on a size 8 pair of jeans today! I am so happy...can't wait for my next pen to come, it's a way of life for me 😊



5 likes

skinnyclinic_ We love your feedback @skinnyclinic_ The Skinny Pen suppresses your appetite, you feel fuller faster and it burns calories DM for more Details 💙

View 1 comment



Skinny Jab 2020



INFORMATION

Average weight loss is 12-20lbs within the first 4 week course

The Initial programme lasts 3/4 weeks, this includes full medical consultation, clinical assessment, complete home care package, ongoing aftercare and out of hours support service.

You will have access to a clinician or trained advisor 12 hours a day, 7 days a week. The call centre service with staff on hand to direct your enquiry, is open 24/7 with immediate access to clinicians as required

Our unique programme is designed to achieve weight loss that stays off. Dietary planning during and when finished the course has been specifically devised by Caroline the CEO & Founder of SkinnyJab to maximise your weight loss results, we have successfully treated over 7000 patients





Any questions?



Other resources



- Follow us on Twitter:
@ASA_UK @CAP_UK
- Sign up to our newsletters
Insight and *Update*
- Regular training seminars
and bespoke presentations
- Copy Advice
- Advice Online database
- Check out weekly rulings

