



JCCP Guidance

Supporting Registrants to Maintain
Compliant Advertising

The Joint Council for Cosmetic Practitioners (JCCP) is committed to supporting registrants in maintaining high standards of professionalism, transparency and public protection.

As part of our ongoing oversight, we continue to monitor advertising and promotional activity to ensure it aligns with both the [JCCP Advertising and Promotion Policy](#) and the UK Advertising Codes. This guidance is intended to assist our registrants in achieving and maintaining compliance, but it may also be helpful to non-JCCP members.

Recent observations by the Professional Standards Authority (PSA), alongside our own monitoring activity, have highlighted instances where advertising does not meet the current requirements. In particular, practitioner websites and social media content have been found to breach the rules relating to the advertising of prescription-only medicines (POMs) for non-surgical cosmetic interventions to members of the public

What have we found?

The most common concerns are references to botulinum toxins, directly and indirectly and particularly on the homepage of websites and on social media, but it also includes other POM's. There has also been insufficient reference to the need for a consultation.

What do we mean by promoting a POM?

Any activity that could lead a member of the public to seek out a particular POM, or a procedure involving a POM, is a promotion. It can include price lists, testimonials, paid and non-paid advertising and more. All Prescription Only Medicines carry risk and, in the UK, it is an important feature of public protection regulation that the decision to prescribe any POM is reached jointly between the prescriber and the patient after consultation, including understanding of the risks, benefits and options, before a decision can be made. Illegal advertising bypasses this critical safety mechanism.

What You Need to Know

Prescription-only medicines must not be advertised.

The Human Medicines Regulations (2012) restrict the promotion of POM's in law and this is enforced by the MHRA, and by the Advertising Standards Authority (ASA) against the CAP code.

The [MHRA's Blue Guide](#) and the Committee of Advertising Practice (CAP) Codes provide the standards for compliance with the regulations.

Prescription-only medicines (POMs), including botulinum toxin products, must not be advertised to the public in any format, including printed literature, social media postings and on websites. You can promote the services you offer providing they don't reference a POM, directly or indirectly. There are specific requirements about how you describe the medicines you use on your website.

References to POM medicines on websites must:

- Not be found on the homepage
- Promote the consultation on a separate page.

Where appropriate, broader terms such as consultation for anti-wrinkle treatments may be acceptable where these genuinely refer to a range of treatment options rather than solely to botulinum toxin or to the use of any other POM. Registrants should always consider whether the overall communication could have the effect of promoting a prescription-only medicine.

Direct and Indirect references to POM's

Direct references are the POM's brand names such as 'Botox®' or generic names such as 'botulinum toxins'.

Indirect terminology is that which 'infers' that a particular medicine is intended.

For example:

- 'Anti-wrinkle injections' becomes promotional, and therefore non-compliant, when it is used alongside other terms, for example, price per area, or with before and after photographs which demonstrate the effect of a POM. (Registrants should read separate ASA guidance (please see Resources on page 8), or view the bite-size video, relating to the use of [before and after images](#).)

Similar examples include:

- Wrinkle-relaxing injections
- Wrinkle-relaxing treatment
- Beautox
- Haytox
- #Botox®
- #Brotox

Pricing and promotions

Pricing structures can also amount to indirect advertising of a prescription-only medicine.

For example, advertising prices based on "1 area", "2 areas" or "3 areas" is widely understood to refer to botulinum toxin treatment and may therefore be considered promotional.

A safer approach is to advertise consultation-led pricing, for example:

Prices from £X. Following a consultation with a prescriber, each patient will receive an individual assessment, prescription (where appropriate), treatment plan and quotation.

Registrants should avoid promotional offers, discounts or pricing structures that directly or indirectly promote prescription-only medicines, they must further consider their obligations towards [socially responsible advertising](#) and they must not advertise any cosmetic procedure which targets under 18's.

Educational content and marketing materials

Many practitioners assume that educational content is automatically exempt from advertising rules. However, this is not necessarily the case.

Educational material published by a clinic, or by an individual practitioner whose

website or social media account is linked to providing treatment, may still constitute advertising if, when viewed in its overall context, it promotes a prescription-only medicine.

This may include posts discussing:

- How botulinum toxin works
- Treatment indications
- Benefits of treatment
- Potential complications
- Before and after images.

For example, educational content which includes a link to a booking site will likely be non-compliant. Each communication will be assessed on its overall context and whether it has a promotional effect.

What the JCCP expects to see

If you provide services that include the use of POM's, take a tiered approach to how you describe them on your website:

- The homepage should provide an overview of the services offered, 'wrinkle treatments' for example. You can also promote a consultation for wrinkle treatments here. A link to a second page providing more information about the consultation is permitted.
- The second page is where you can provide information about the consultation, subject to the following condition:
 - You only promote the consultation. In particular you should note that the consultation is a review of all available treatment options which may or may not lead to a medicine being prescribed. A member of the public must be able to consider this information before choosing to review further medicine specific information. To achieve this, a link to a third page is recommended.
- The third page allows you to provide information about a POM. All information about the medicine must be balanced and factual. This means that you must only describe the licensed indications. All POM's carry risks as well as benefits, and this should be clear to provide a balanced perspective. The Patient Information Leaflet or the Summary of medical Product Characteristics is the source for this information.
 - This page is also where you would include your price lists.

It should be clear therefore that it is not possible to achieve this through social media. All activity on social media must be restricted to high level information equivalent to the homepage of a website. It is important to note that the ASA would treat a digital ad, for example a social media post, in the same way as the homepage of a website.

Social media postings can include links to a practitioner or clinic website. Rather than relying on social media, we encourage all JCCP registrants to have a website so that they can provide sufficient information about themselves and the services they offer.

These rules apply to all prescription-only medicines

Although questions commonly arise in relation to botulinum toxin, these advertising restrictions apply to all prescription-only medicines used. Common examples within aesthetic practice are:

- Hyaluronidase, for example 'dissolve & refill', 'Filler dissolve'
- Intramuscular corticosteroid ("hay fever") injections
- Prescription-only Vitamin B12 preparations
- Local anaesthetic injections
- Prescription weight loss medicines
- Intravenous drips (*the 0.9% Saline drip is a POM, irrespective of the status of any additives*)

Booking systems

If you permit online bookings for procedures involving a POM, you may need to take additional care.

If you use an independent booking platform that is directly accessible to the public, you must not permit procedures using a POM to be booked. A member of the public who is able to view a standalone booking platform which offers for sale 'Botox 3 areas' or 'anti-wrinkle 1 area' is subjected to non-compliant promotional activity. You must only use independent booking platforms to facilitate booking consultations and for procedures that do not involve a POM.

If you allow online booking via your website so that the booking platform is not accessible independently, you can permit the booking of procedures involving a POM subject to all of the following conditions:

- Your website is compliant with advertising regulations such that the booking facility is provided, for example, alongside the price list rather than on the home page.
- The procedure to be booked, 'Botox 2 areas' for example, is available only to those who have received a consultation with a prescriber who has authorised the specified procedure.
 - If you are not the prescriber, the authorisation or 'directions' should be in writing.
- It is set out clearly as part of the booking service that a procedure must not be requested in the absence of a consultation having been undertaken.

Delegating POM's.

There are additional cross-cutting considerations in regard to wider regulation and JCCP standards.

If you are a prescriber offering prescribing services to clinicians in separate premises, you should ensure that the person you delegate the procedure to understands this guidance if they intend to promote their services. You should note that if you delegate the procedure to a professionally unregulated person, you accept a higher level of accountability for their actions.

If you are a non-prescribing practitioner, including registrants on Part B of our register, you should be clear when describing your services that a face-to-face consultation with a separate prescribing colleague is required to assess suitability.

What Happens if We Identify Non-Compliant Advertising?

Our aim is to support all registrants on both parts of our register to achieve compliance through education and constructive engagement, helping to maintain the confidence that accreditation with the JCCP demands.

The JCCP undertakes routine audits of registrants' websites and social media activity. Where JCCP identifies advertising that does not comply with our policy or applicable advertising requirements, we will contact the registrant directly and ask that the content is reviewed and amended or removed within an appropriate timeframe. The

JCCP intend to take a proportionate and risk-based approach to enforcement, we will monitor ongoing compliance, and you should be aware that a continuing failure to meet expected standards could have implications for your JCCP registration. The JCCP reserves the right to refer non-compliant promotional activity to the relevant regulators, including the ASA and the MHRA.

As regulated healthcare professionals and as JCCP Part A registrants you are accountable for the decisions you make, and you should seek advice from the CAP or the MHRA in the event of any doubt about compliance in any promotional activity you intend to undertake.

The JCCP does not currently accredit Part B registrants to perform injectable procedures with POM's. Nevertheless, if these procedures are undertaken outside of their accreditation we do expect wider compliance with regulation. We recommend that, in the first instance, you seek guidance from your prescriber in relation to any promotional activity for procedures that they have authorised and have responsibility for.

Resources

We encourage all registrants to review:

- [JCCP Policy Statement: Advertising and Promotion of Aesthetic Cosmetic Injectable Treatments.](#)
- [ASA BiteSize: Botox and Non-Surgical Cosmetic Interventions.](#)
- [Guidance on the marketing of surgical and non-surgical cosmetic procedures](#)
- [Beauty and Cosmetics: Botox](#)
- [Botox FAQs](#)
- [Healthcare: Prescription-Only Medicine](#)

Taking a few moments to review your website, social media channels and advertising materials now can help ensure your communications remain compliant and continue to demonstrate the high professional standards expected of JCCP registrants.

Quick Compliance Checklist

Before publishing any marketing material, ask yourself:

- Does this advertise directly or indirectly promote a prescription-only medicine?
- Does it use terminology that patients associate with botulinum toxin?

- Does it include pricing or offers that could promote a POM?
- Could educational content be interpreted as encouraging patients to seek treatment?
- Is the focus on promoting the medicine rather than the consultation and professional assessment?

If the answer to any of these questions is "yes", review the content carefully against the JCCP Policy, ASA and CAP guidance before publication.

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