



Enforcement Notice:

Advertising of Cosmetic Surgery Abroad

Who we are

We are the [Committee of Advertising Practice \(CAP\)](#). We write the advertising rules, which are enforced by the Advertising Standards Authority (ASA), the UK's independent advertising regulator. You can read about the UK advertising regulatory system [on the ASA website](#).

Background

CAP understands that UK consumers are increasingly traveling abroad for cosmetic surgery, in part due to cost or ease of access; advertisers targeting UK consumers need to ensure that they're following the [CAP Code](#), even if their services aren't based here. Whilst many people who have cosmetic surgery abroad have positive experiences, there are still inherent risks, which is why it's so important that ads for these services aren't misleading or irresponsible.

Why are we contacting you?

In 2023 the ASA published several Rulings in relation to how non-UK based cosmetic surgery providers were advertising their services to UK consumers – with particular reference to the way information was displayed within paid-for ads and influencer marketing on social media channels, including Instagram and Facebook.

You should now review all of your advertising targeting UK consumers to ensure compliance with the [CAP Code](#), and as set out in the guidance below. If we see continued problems in this area after **29 February 2024**, we will take targeted enforcement action to ensure consistent standards across the industry. This may include – where advertisers are unwilling to comply – working directly with social media platforms to remove content which breaks the UK advertising rules, or referral to the relevant advertising regulatory body in your own country. You can read more about the sanctions available to the ASA [here](#).

Scope

We are only concerned with ensuring that advertisers' marketing for cosmetic surgery abroad - where it targets UK consumers - complies with the CAP Code. We are not seeking to regulate the medical practices of clinics themselves, or their consultations. This notice focuses on paid-for ads online and influencer marketing targeting UK consumers on social media. It does not directly apply to ads in other media, but we would strongly advise you to apply the principles and guidance within this notice to any other advertising which might be seen by UK consumers, including your own websites and leaflets, and any other non-paid-for space under your control, including on your own social media channels. More information about the remit of CAP Code as it applies to UK advertising, can be found [here](#).

Guidance

#1 Do not trivialise the decision to undergo cosmetic surgery:

The decision to undertake an invasive medical procedure is a serious one. Marketers must therefore ensure that cosmetic surgery is always portrayed as something that requires time and thought from consumers before proceeding:



- **Avoid** the focus of your ad being on aspects such as hotel stays or flights, rather than the surgery or intervention itself; this could have the effect of trivialising the decision to undergo cosmetic surgery. Similarly, references to going on “holiday” or “vacation” might also have the effect of detracting from the seriousness of any surgery and should therefore be avoided.
- **Avoid** focusing purely on any “feel good” element of physical transformation or suggest that the decision to have cosmetic surgery could be undertaken lightly, for instance by suggesting that it could form part of a New Year’s resolution or a summer holiday; this might also detract from the seriousness of any surgery.



- **Take care** with your imagery, wording, and even use of emojis. All of these can make a difference to the overall tone and therefore acceptability of an ad; the more invasive the procedure, the less trivial, flippant, and light-hearted the ad should be.

#2 Manage expectations: ensure transparency around any packages, consultations, and potential risks & results of cosmetic surgery:

Advertisers must be careful not to mislead by omitting any material information that consumers would need in order to make an informed decision in relation to undertaking cosmetic surgery.



- **Ensure** that you make the basis of any “all inclusive” packages suitably clear. Although the nature of cosmetic surgery means that it isn’t always possible to calculate a final cost upfront, clinics must avoid advertising misleadingly low headline prices to attract consumers, only for costs to unexpectedly escalate further down the line. Whether you are advertising package prices or providing itemised price lists, be clear on exactly what is and isn’t included within your advertised costs.
- **Ensure** that you provide information about any pre-consultations to assess any potential contraindications and general suitability for patients, and any additional consultations which might take place before or after surgery, including *where* those consultations will take place. This is particularly important where services are offered abroad rather than in the UK because of the potential for additional risks, such as whether the doctors and treatment providers have the same standards of care and safety as in the UK, and how any arrangements for follow-up care, or dealing with any complications, might be managed. Information about pre-consultations must be included within the ad itself and not just on your clinic website or within information provided separately to prospective patients.



- **Do not** imply that invasive surgery is a “minor procedure” or similar if that claim is likely to mislead as to the complexity or duration of the operation, the pain experienced either during or after the operation, the length of the recovery time or the potential side-effects. Ads should similarly not mislead as to the likely time commitment required for pre-consultation, surgery, recovery, and post-operative assessments.
- Similarly, **do not** offer to “Guarantee safety” or refer to procedures as “safe”. Any cosmetic surgery carries inherent risks; to claim otherwise is irresponsible and misleading.
- **Do not** exaggerate the effectiveness or imply an unrealistic result of any particular cosmetic surgery, through visual means or otherwise. Care should be taken to ensure that any imagery accurately depicts any physical transformations as a result of a particular procedure, and any images representing people “before” and “after” surgical procedures as part of customer testimonials should be genuine. Similarly, marketers should avoid claims such as “get the body you always dreamed of” or “99% success rates”; these could also create unrealistic expectations, and as such, would be likely to mislead.
- **Avoid** making superiority claims or comparisons with unidentifiable competitors (e.g. “Leading Experts” or “No.1 Clinic”) without suitably clarifying the basis of such claims (as well as ensuring that you hold appropriate substantiation).

#3 Ensure you advertise in a socially responsible manner:

Advertisers must ensure that cosmetic surgery procedures are advertised in a socially responsible manner:



- **Do not** market cosmetic interventions to under-18s in the UK.
- **Avoid** exploiting consumers’ body insecurities in general terms; ads for cosmetic surgery which portray individuals as only being confident or happy because of surgery are unlikely to be acceptable.
- **Avoid** using gender stereotypes which are likely to cause harm, or serious or widespread offence. For example, care should be taken not to exploit the potential concerns and anxieties that new mothers might experience after giving birth; for this reason, marketers are advised to avoid “mommy makeover” style packages or promotions, because it’s likely that these will have the effect of exploiting body insecurities in new mothers and perpetuate pressure on them to conform to body image stereotypes.
- Marketers **must not** use imagery which is likely to be seen as degrading, objectifying or gender stereotyping. Similarly, whilst a degree of nudity may be acceptable due to the subject matter, gratuitous nudity is very unlikely to be acceptable, and marketers should ensure their ads do not sexualise or objectify the model/s within them.

#4 Exercise caution around promotions

The CAP Code does not prohibit promotional marketing in this sector – cosmetic surgery advertisers are allowed to offer discounts and even sales on their products and services, whether abroad or in the UK. That said, care should always be taken with any promotional marketing for cosmetic surgery:



- **Avoid** pressuring potential customers with time-limited offers, for instance by using phrases such as “Summer Sale”, “Grab this opportunity” or “Fill out the form now for a big Summer campaign”.
- Similarly, **do not** advertise treatments as being discounted for a “limited time only” if this is not actually the case; consumers must not be pressured into making a rushed decision to purchase cosmetic surgery due to apparent time-limitations.
- **Avoid** irresponsibly pressuring potential customers into undertaking more cosmetic surgery interventions than necessary, for instance by offering discounts on multiple procedures e.g. “Up to 30% discounts on combined operations”.



- **Take** care to clearly outline all significant Terms and Conditions associated with any promotions. For the purposes of the CAP Code, T&Cs are considered significant if they are likely to affect a consumer’s purchasing decisions.

Appendix: Relevant ASA Rulings, CAP Code rules, and useful reading

Relevant ASA Rulings:

[Aestheal Clinic A23-1199874](#)

[Aspro Atlantic Medikal Turizm Ticaret Limited Şirketi, trading as: AsproMED A23-1199868](#)

[Dakik Sağlık Medikal Turizm A.S. A23- 1199876](#)

[Egemed Hastaneleri A22-1178817](#)

[Erdem Clinic A23-1199873](#)

[Ersoy Health Services Tourism Ltd, trading as: Clinic Haus A23-1199872](#)

[Etheday A23-1182453](#)

[GET DHI Hair Clinic A23-1199875](#)

[UAB Forma Perfecta A23-1199866](#)

Relevant CAP Code rules:

1.3 Marketing communications must be prepared with a sense of responsibility to consumers and to society.

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

3.3 Marketing communications must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

Material information is information that the consumer needs to make informed decisions in relation to a product. Whether the omission or presentation of material information is likely to mislead the consumer depends on the context, the medium and, if the medium of the marketing communication is constrained by time or space, the measures that the marketer takes to make that information available to the consumer by other means.

4.9 Marketing communications must not include gender stereotypes that are likely to cause harm, or serious or widespread offence.

See Advertising Guidance: ["Depicting gender stereotypes likely to cause harm or serious or widespread offence"](#)

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

Want more?

Useful reading

If you are an advertiser looking for more information on this topic, you might find our guidance on [Cosmetic Surgery](#), [Cosmetic Interventions](#), and [Cosmetic Interventions: Social Responsibility](#) useful.

Bespoke Copy Advice

Contact the CAP Copy Advice team [here](#), which offers a free and confidential bespoke pre-publication advice service.