



# Enforcement Notice:

## Advertising of Aesthetic Injectables Training Courses

(Such as Botox and dermal filler training courses)

### 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 regulator. You can read about the UK advertising regulatory system [on the ASA website](#). For free and confidential advice about specific non-broadcast ads, please contact the [CAP Copy Advice team](#).

### Why are we contacting you?

It has come to our attention that there are a significant number of advertisers advertising training courses for aesthetic injectables such as Botox and dermal fillers. Some of these ads have failed to include material information we consider to be important for prospective students. The ASA considered these issues in the following ASA Rulings:

[ASA Ruling Boss Babes](#)

[ASA Ruling Aesthetics Lounge](#)

[ASA Ruling AU Training](#)

Information omitted from the ads included; requirements to get on the course, the nature and duration of training, what qualification one would expect to achieve and if the course on offer met the standards necessary for admittance onto a professional relevant register.

In the absence of this information advertisers risk breaching the Advertising Codes for issues surrounding misleadingness and the omission of material information for cosmetic training ads. We are communicating this guidance to the cosmetics and regulatory industry to ensure a level playing field and compliance with the CAP Code.

This guide is to assist you with your ads concerning **training courses** for aesthetic injectables such as Botox and dermal fillers.

In all cases, the ASA also considered the NHS guidance ["Choosing who will do your cosmetic procedure"](#).

## Best practice for your Aesthetic Injectables Training Courses (Dermal filler & Botox injections)

### **State what the minimum requirements are to get on the course:**

Stating what the minimum requirements are to enrol onto your course is important. A prospective student should be able to see this information in the first instance, so they can make an informed decision as to whether or not they have the credentials to enrol onto the course or to enquire further. Advertisers should take note so they can ensure their ads provide this clear indication.

In this [ASA Ruling](#) the ASA noted that there appeared to be no minimum requirement for entry onto the advertised course. This brought into question many other aspects of the ad. In another ASA Ruling the ad stated:

*“This is an ideal starting point, we accept students from various backgrounds and every case is different therefore the best thing to do is contact us”.*

This was unclear and did not signify the minimum requirements for enrolment onto the advertised course. Similarly, in another [ASA Investigation](#) the advertiser stated:

*“Pre course requirement's [sic] are on the therapists merit, usually the insurance will require at least level 3 a and p vtct, full beauty level 3, or semi permanent make up artist”.*

This was ambiguous, as there appeared to be no definitive entry route to get onto the course. Furthermore the ad gave the impression that prospective students would need an existing qualification in order to obtain suitable insurance for the course.

Omitting material information such as the requirements for acceptance onto your course is likely to break the CAP Code. So to avoid these issues, you should make sure the minimum requirements for acceptance onto your course are transparent in your advertising.

### **Our recommendation: we would advise the use of an appropriate amount of detail concerning the minimum requirements for your training course, for example:**

- *“Subject to proof of your active license to practice in the UK, we accept the following professionals onto our course - doctors, nurses and dentists.”*
- *“You must have a minimum of a beauty therapy Level 3 qualification to enrol onto this course”*

## Best practice for your Aesthetic Injectables Training Courses (Dermal filler & Botox injections)

### **State the qualification that would be attained:**

It sounds straight forward, but the ASA recently upheld complaints concerning advertisers who did not state the qualification to be attained in their marketing communications.

In this [ASA Ruling](#) the ASA established that there was no information stating what qualification would be attained. In another [ASA Ruling](#) the ASA considered that the following claim concerning the qualification to be obtained, lacked clarity:

*“Qualification: Anti-Wrinkle Injections and Dermal Fillers”*

More information was needed to show what the qualification would be once obtained by the student.

**To avoid future problems in your advertising we advise an appropriate level of detail in your ads concerning the qualification to be attained, for example:**

- ***Level 7 Certification in Injectables for Aesthetic Medicine BOTOX® and dermal fillers***
- ***Level 6 Aesthetic Injectables Certificate in HA Dermal Filler***

### **State the duration of training for your course:**

The ASA recently investigated and upheld complaints about two ads, as there was no information regarding the course length in the ad. Similarly in another [ASA investigation](#) although the advertiser included the course length in their ad (3 days), the remainder of the ad omitted various other material information which overall made the ad problematic. So it's important all elements of your ad cross reference with each other.

**Examples of duration terms for your advertising (as applicable):**

- ***Course length - 2-3 days***
- ***Course length - 6-18 months***

## Best practice for your Aesthetic Injectables Training Courses (Dermal filler & Botox injections)

### **State the nature of training that is going to take place:**

[CAP Code rule 3.3](#) states that material information is information that the consumer needs to make an informed decision in relation to a product. This is why it is important to include detailed information in your ad regarding the nature of training. Consumers need to have a clear indication as to what the training will involve. In this [ASA Ruling](#) the advertiser stated:

*“Gain valuable experience of beginner level injection... Learn a range of techniques for injection of lip filler injection...What will I learn? - Contraindications and Post treatment advice & when not to treat a client”*

There was no further information as to how students would gain knowledge and the practical experience required to safely administer dermal filler and Botox injections and deal with serious complications if things went wrong. As such, the ASA concluded this ad was likely to mislead prospective students.

You should ensure your ad details the nature of training in a way that is transparent. Subsequently a consumer will be able to see in the first instance whether the course has the likelihood of giving them the knowledge, skills and safety training to carry out procedures independently.

### **The following examples advise on the appropriate level of detail which should be in the “nature of training” part of your ad:**

- ***You will learn ethics and law in aesthetic medicine, cosmetic psychology, skin science and the science of botulinum toxins and dermal fillers. Our programme includes face to face lectures, eLearning and clinical practice***
- ***Introductory day – An introductory tailored workshop to Botox and dermal filler training. You will learn about skin science including the structure and function of the skin and hair, recognising skin conditions and contraindicate treatment and referral pathways for patients suffering skin-related conditions. You will also understand the signs of body dysmorphia, and how to deal with patients who may need to be refused treatment***
- ***eLearning- 130 hours of CPD accredited university standard material. Your progress will be monitored***
- ***Clinical practice - you will be mentored under the guidance of an experienced mentor. You will do a minimum of 40 practise treatments as follows – 2 observation days and five 1:1 mentoring sessions. You will observe a minimum of 10 Botox treatments, also performing 10 Botox treatments yourself under close expert supervision. Finally you will learn how to consult for a wide range of indications, a range of optimal injection techniques and how to manage complications and side-effects***
- ***Assessment – you will do a written assignment involving short answer questions and an objective structured clinical examination***

## Best practice for your Aesthetic Injectables Training Courses (Dermal filler & Botox injections)

### **State whether the qualification meets the standards necessary for admittance onto a relevant professional register**

In the following three rulings the ASA upheld all complaints about the ads as they did not say whether the qualification met the standards necessary for admittance onto a relevant professional register.

[ASA Ruling on A U Training Ltd t/a Aesthetics Uni](#)

[ASA Ruling on Person\(s\) unknown t/a Boss Babes Uni](#)

[ASA Ruling on Aesthetics Lounge Academy Birmingham Ltd](#)

The ASA felt in all cases that prospective students should be able to see whether the qualification met the standards necessary for admittance onto a relevant professional register.

**Please see the following examples as a best practice guide for whether the qualification you're advertising meets the standards necessary for admittance onto a relevant professional register:**

#### **If your course qualification meets the standards for admittance onto a relevant professional register:**

- *This qualification allows both current and aspiring practitioners to meet the current frameworks such as Save Face's Register or the Joint Council for Cosmetic Practitioners' Register, as well as future-proofing your training against possible new regulations*

#### **If your course qualification doesn't meet the standards for admittance onto a relevant professional register:**

- *Please note this is an introductory course and does not meet the current frameworks for admittance onto a voluntary professional register. You can read more about voluntary professional registers on the professional standards authority website here <https://www.professionalstandards.org.uk/check-practitioners>*

## Appendix: Code rules

### Relevant [CAP Code](#) rules:

#### 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.

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