## Consumables

#### **Equipment requirements**

- 30ml vial Bacteriostatic 0.9% Sodium Chloride
- Clinisept
- Hand sanitizer
- 30g tube Emla/LMX cream
- Powder free Latex free Examination gloves
- Gauze Swabs
- Sterets Swabs
- Arnica Gel
- Sterile dressing Pack
- Witch Hazel
- Face Wipes
- Headband
- Mirror

#### **Recommended Emergency Drugs:**

- Adrenaline Auto-Injector e.g Epi pen, Emerade or Vials
- Aspirin 300mg
- Hyalase and bacteriostatic saline
- GTN ointment (optional)
- Oral antihistamines (optional)

#### **Needles and Syringes:**

- 30G Yellow 1/2" Needles (33G also available)
- 21G Green 2" Needles
- 2ml Syringes
- 1ml Syringes

## **Costing Guidelines**

#### Guide line prices for non-surgical treatments

#### Wrinkle reducing treatments (Botox<sup>®</sup>):

1 Area: £195 2 Areas: £260 3 Areas: £320

*Please note these are just guideline prices for Botox. Prices will differ based on your location and your competitors.* 

#### **Dermal Filler treatments:**

Juvederm ULTRA 2	£300 per 0.55ml syringe If more than one syringe at the same treatment the subsequent syringes can be reduced.
Juvederm ULTRA 3	£350 per 1ml syringe If more than one syringe at the same treatment the subsequent syringes can be reduced.
Juvederm ULTRA 4	£350 per 1ml syringe If more than one syringe at the same treatment the subsequent syringes can be reduced.

# **Advertising Guidelines**

#### **Guidelines for Advertising Cosmetic Procedures**

#### Who's Responsible?

The British Code of Advertising, Sales Promotion and Direct marketing governs nonbroadcast adverts, sales promotions and direct marketing and is enforced by the Committee of Advertising Practice (CAP).

The Code outlines the specific rules applicable to the advertising of health and beauty products and treatments.

The guidelines are fairly stringent saying that medical or scientific claims should always be backed by evidence and that advertising and marketing should not try to blind the reader with science or use medical or scientific jargon in a bid to baffle consumers.

The Code also gives guidelines for the advertising of medicines, stating that prescription only medicines, such as botulinum toxin, must not be advertised to the public; that advertisers should not use health professionals or celebrities to endorse medicines or make unqualified claims that products can 'cure' problems or symptoms.

The CAP has produced a health and beauty checklist detailing all the things that should be avoided when advertising. The list is fairly in-depth and can be accessed at www.cap.org.uk. The Consulting Room (www.consultingroom.com) has also produced a summary of the rules and regulations governing electrical devices such as nonsurgical facelifts; cellulite products; dermal fillers and botulinum toxin; hair removal treatments and lasers and IPL.

The Advertising Standards Authority (ASA) and the Medicines and Healthcare products Regulatory Agency (MHRA) also have a role to play. The ASA is an independent body set up by the advertising industry to police the rules laid down in it. The ASA endorses and administers the Code, ensuring that the self-regulatory systems work in the public interest.

The MHRA works with other statutory regulations and self-regulatory bodies to ensure advertising is fully compliant with both EC and UK medicines law. The MHRA's Advertising Unit routinely scrutinises medical journals, magazines to the general public and also the internet for the promotion of licensed medicines. It selectively checks advertising for compliance with the laws prior to publications; monitors published advertising material for medicines; handles complaints about advertising; enforces the laws where there is no compliance; and provides advice to industry professionals through its Blue Guide which has recently been updated and can be viewed on the MHRA's website (www.mhra.gov.uk).

#### Following the Rules

All practitioners have a duty to ensure their promotional literature, marketing and advertising is legal, but when one rule appears to apply for one and another for another it can be frustrating and confusing business.

This is particularly true when it comes to issues surrounding aesthetic treatments using prescription only drugs. Prescription only medicines can be advertised to the medical, dental, veterinary and allied professions, however, it is illegal in the UK to advertise to the public products that are either medicinal by function (i.e. where the product contains one or more active medicinal ingredients) or medicinal by presentation (i.e. where the product is presented as being able to treat or prevent disease or correct, restore or modify physiological functions). An exception to this rule is when products hold a valid marketing authorisation and the claims in the marketing communications confirm to both the authorisation and the CAP Code.

Manufacturers of prescription only medicines may be able to give general information to consumers about a disease but should neither directly or indirectly advertise the medicine nor discourage readers from seeking essential treatment or medical attention. Acceptable disease awareness advertising by such manufacturers might take the risk from a disease. Information on specific prescription medicines should only be provided as part of the prescribing process or after a prescription has been issued.

Clinics can promote the services they provide and give information on how certain conditions are managed; however, they should not draw attention to specific prescription only medicines as doing so is likely to breach regulations by encouraging the public to request a particular treatment or product by name. They can say, for example, that they offer treatments for lines and wrinkles or advertise using the general term 'cosmetic fillers' or 'injected fillers' as this is non-specific and may include various procedures. However, their advertising must not mention specific product names or imply the use of particular products.

This all makes it very difficult for clinics to market the treatments they provide within the remits of the code, especially when the public already know and seek out many of the treatments by name. Indeed anyone who has entered the word 'botox' in to a Google search on the internet will know that this rule is more often than not disregarded.

#### A Fine Line

Everywhere we look there are hundreds of examples of clinics and practitioners breaking the advertising laws through their clinic literature, on the internet, in the windows of their practice and in magazines and on television programmes.

This is partly due to lack of knowledge about how strict the guidelines are and uncertainty over how much should just be considered as 'advice'. However, the main cause of advertising lawbreaking is actually the generally accepted belief that there are no consequences to doing so because the industry is not adequately policed.

The sporadic policing of advertising guidelines in the aesthetics industry can be put down, in main, to a lack of resources as well as to the fact that the industry is not currently regulated.

MHRA and the Healthcare Commission are making moves to address this. As recently reported by The Consulting Room they have begun to enforce the guidelines on large advertisers such as Yell Group Plc, but this is just the tip of the iceberg especially with the huge amounts of 'illegal' marketing on the internet.

In the current market it seems that anyone can advertise a cosmetic service to the public and seemingly get away with it, so the need for more regulations is clear. Public safety is a number one priority and the marketing and advertising carried out by clinics should be monitored to ensure it upholds this duty of care. However, there is a very thin line between creating an industry that is safe and well policed and one that is over-regulated to the detriment of the business operating within it.

#### Other Marketing hints and tips

- Use social medial to advertise your work. Take photos (ensure you have consent) and post on Facebook and Instagram.
- •
- Introduce loyalty cards example introduce a friend and both receive £50 off your next treatment
- It costs more money to find new patients so re-book your existing ones at the end of every appointment
- Use the treatment plan to upsell other treatments and products

# Handling Insurance Claims

"Claims" break down into two main categories: dissatisfaction and allegations of negligence. Here is a short commentary on each and an explanation of how insurance companies could approach cases on behave of clients.

#### Dissatisfaction

Dissatisfaction claims come in a wide range, ranging from allegations of rudeness from staff to disappointment with the procedure outcomes.

In these types of cases the main objective is to narrow the issues in dispute at the earliest opportunity and work with corrective treatment to ensure the complaint does not develop into a claim for compensation.

More often than not, the decision as to any particular course of action is a commercial one. It would be naïve to think that social media is not a force in these situations and your reputation is the most important factor in cases in this category. Where commercial reasons make a good will payment appropriate, we advise on a suitable offer.

#### **Allegations of Negligence**

Here, matters are much more formal. Increasingly clients will be represented by Solicitors (often on a "no win, no fee" basis). The process will start with a request for records (which cannot be denied). The strongest defence at this stage is evidence of a robust consent procedure such that the risks of the Solicitors progressing the case are too great. If the client loses the case he/she will have to pay the costs of both sides.

A notification to insurers is required as part of the policy conditions and they may well appoint their own Solicitors to act on your behalf.

### **Contact Details**

#### **Pharmacies**

Pharmacy Space

01296 331831 www.pharmacyspace.co.uk

#### Allergan – Your Spark

Your Spark

01204 440292 www.yourspark.com spark@allergan.com

#### Insurance

Healthcare Professional Protection (HPPB)

Prescribing

Aesthetic Associates

0203 058 3733 www.hppb.co.uk

0121 384 2717 www.aestheticsassociates.com

#### **Cosmetic Associations**

British Association of Cosmetic Nurses

British Association of Cosmetic Dentistry

British college of Aesthetic Medicine

01749 836328 www.cosmeticnurses.org

0207 612 4166 www.bacd.com

01474 823900 www.bcam.ac.uk

# Health & Safety

### **Emergency Kit**

### The kit includes:

- Medium and Large sterile dressings
- 33G needles and 21G needles
- Sterile leur syringes 1ml, 2ml, 5ml and 10ml
- Sterile adhesive dressings
- Sterile Eye pad dressings
- Gauze swabs
- Safety pins
- Adhesive tape
- Foil blanket
- Heat/cold pad
- Gallipot tray
- Sharp/Blunt scissors
- Sharps container
- Pocket face mask in case
- Nitrile disposable gloves
- Resuscitation face shield
- Group consent forms
- Resuscitation guidelines
- Guideline on how to reconstitute hyaluronidase
- Guideline on how to manage filler complications
- Aesthetic Complications Expert Group guidelines (ACE)
- Hyalase
- Epipen