

The Institute of Trichologists

BEST PRACTICE GUIDANCE

On the Promotion and Advertising of Medicines (POM/OTC/GSL)

For all IOT registrants, clinic staff, social media accounts, websites (including clinic pages), marketing agencies and influencers acting on behalf of registrants. It covers promotional communications to the **public/patients**. Regulators are actively policing online and influencer channels where POM promotion can occur indirectly (e.g., imagery, euphemistic language, affiliate marketing). The safest legally compliant approach for IOT registrants is to **focus public communications on clinical services and patient education** (conditions, referral pathways and safety information) while **reserving any mention/ referral of possible prescription treatments for private consultations**.

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1. DEFINITIONS

- **POM** - Prescription-Only Medicine: may only be supplied against a valid prescription; must not be advertised to the public. [ASA](#)
- **P/Pharmacy/OTC/GSL** - medicines that may be sold in pharmacies or general retail (classification depends on licence). Advertising rules differ by class; many OTCs may be advertised to the public but must comply with PAGB and MHRA rules. [GOV.UK+1](#)

2. FUNDAMENTAL RULES/REQUIREMENTS - IN RELATION TO ADVERTISING

2.1 PRESCRIPTION-ONLY MEDICINES (POMS)

- **POMs are NOT to be advertised to the public.** This includes: direct naming, images of packaging, injection pens, promos, price offers, coupons, or statements that a clinic supplies or prescribes a named POM. (This prohibition extends to social media and influencer posts.) [ASA+1](#)
- You **may** communicate about conditions and clinical services (for example: “we offer assessments for (condition) and, where clinically appropriate, treatment options may include prescription medicines following consultation”), but **do not** name or describe a specific POM on publicly accessible pages, posts, ads or proactively linked landing pages.
- Do **not** offer or advertise free samples of medicines to the public. [Pharmacy Regulation](#)

2.2 OTC / PHARMACY (P) / GSL MEDICINES

- OTC/GSL medicines may be advertised to the public, but all advertising must be legal, decent, honest and truthful and must not mislead about efficacy, safety, or indications. Claims must be consistent with the product licence and summary of product characteristics (SPC). PAGB consumer guidance should be followed for OTC advertising. [PAGB+1](#) and the requirements set out in Section 12 of the CAP
- Code https://www.asa.org.uk/type/non_broadcast/code_section/12.html

- Avoid implying that an OTC will cure or dramatically alter a medical condition beyond licensed indications; always present balanced information and safety advice (including when to see a clinician). [GOV.UK](#)
- At the time of policy writing - the cutaneous solution form of minoxidil is listed as a General Sale medicine (GSL) which means that it can be sold by any retailer as long as it fulfils certain restrictions on strength and quantity etc (minoxidil solution can only be classed as a GSL as long its strength does not exceed 5%). If you have any doubts on whether the stock you are buying is suitable, eg. due to any alterations/additions to a 'standard' formulation, please check with your wholesaler/ supplier who should be able to confirm and provide evidence that the minoxidil products they supply fulfil the GSL criteria.

3. WEBSITE & SOCIAL MEDIA REQUIREMENTS

- **Website homepages, landing pages and paid ads:** must **not** reference named POMs, images of POMs, injection pens, price/commercial offers for POMs, or links that proactively promote POMs. [GOV.UK Assets](#)
- **Inner pages:** clinics may host factual, professional content for HCPs (Health Care Professionals) on unlinked pages if compliant with CAP/MHRA rules — but **do not** make these pages **publicly discoverable** via ads or prominent links. Follow CAP advice on websites and the MHRA Blue Guide before publishing any POM-related professional content. [GOV.UK Assets+1](#)
- **Social media & influencers:** any post that could be read by the general public must obey the POM ban. Influencer marketing must be transparent and compliant with ASA/CAP rules; do **not** ask influencers to promote named POMs or to use imagery that suggests availability of POMs. Regulatory action has targeted such practices. [ASA+1](#)

4. PATIENT COMMUNICATIONS

(EMAIL, SMS, APPOINTMENT REMINDERS)

- Routine appointment reminders and follow-ups may reference clinical services generically (e.g. "hair loss assessment available"), but **must not** mention or promote POMs by name or imply a prescription will be provided without appropriate clinical assessment.
- If, after clinical assessment, a Trichologist considers a POM may be advisable, prescription options can only be considered by a registered prescriber. The Trichologist must keep clear boundaries, and the patient **must not** be under the impression that the Trichologist has made decisions regarding POM's. The patient should have the prescribers details (name, registration number) and access to the prescriber to discuss their treatment options and on-going suitability.

5. ENFORCEMENT, COMPLAINTS & ESCALATION

- Non-compliance may be reported to **ASA/CAP** (advertising standards), **MHRA** (medicines advertising), and professional regulators (where applicable). [ASA+1](#)
- **IOT sanctions:** breaches of this policy by registrants may lead to disciplinary action (requirement to remove material, retraining, suspension or referral to external regulator). The IOT will cooperate with ASA/MHRA investigations.

6. QUICK PRINTABLE CHECKLIST (ONE-PAGE)

- No POM names/images/prices in public material. [ASA](#)
- Service descriptions OK if clinical and non-promotional. [GOV.UK Assets](#)
- OTC claims match licence/SPC & PAGB rules. [PAGB](#)
- Influencer posts labelled; no POM promotion. [ASA](#)

7. USEFUL LINKS & CONTACTS (FOR REGISTRANTS)

- ASA advice on POMs / CAP code on medicines advertising. [ASA+1](#)
- GOV.UK / MHRA - Blue Guide: Advertising and promoting medicines in the UK. [GOV.UK](#)
- PAGB - Consumer Code for OTC medicines & Professional Code. [PAGB+1](#)
- For MHRA advertising queries: advertising@mhra.gov.uk (see Blue Guide for contact details). [GOV.UK Assets](#)

8. PRIMARY LEGAL & REGULATORY SOURCES (KEY READING)

- CAP / ASA - prescription-only medicines must not be advertised to the public (CAP Code rule 12.12 / ASA guidance). [ASA+1](#)
- GOV.UK / MHRA - overview and the “Blue Guide” on advertising & promotion of medicines. (Explains classifications POM / P / GSL and advertising rules). [GOV.UK+1](#)
- PAGB - Consumer Code for OTC medicines (advertising aimed at consumers) and Professional Code (advertising to HCPs). [PAGB+1](#)
- ASA/MHRA enforcement updates and recent action (e.g., weight-loss drug advertising crackdown) - demonstrates how regulators interpret online ads. [ASA+1](#)

This best practice guide does not replace or over-rule current statutory guidelines.