

Introduction:

This guidance is intended to support registered members of the Society of Homeopaths to advertise their services via electronic media and/or written material. The guidance has been reviewed by the Committees of Advertising Practice (CAP) and the Advertising Standards Authority (ASA).

The aim of this guidance is to better support members to feel confident that their advertising of homeopathic services are "*honest, decent, legal and truthful*". Following this guidance in all marketing materials should result in fewer complaints and will be less likely to be investigated formally.

The practical approach of the guidance, combines previous publications published by the Society of Homeopaths, CAP and ASA, and should allow further scope as to what is deemed acceptable, whilst remaining within current legislation, regulation and the Society's Codes of Ethics. The document lays out a proposal, which has been cross-referenced against the following legislative and national statutory guidance sources. Most of the following are non-homeopathy specific and therefore applicable to all services across all industries:

Consumer Rights Act 2015/ Consumer Protection from Unfair Trading Regulations 2008:

(When a member of the public engages your services you are entering into a legally binding contract to provide those services. These services must be provided to meet a certain standard)

<http://www.legislation.gov.uk/ukpga/2015/15/contents/enacted-Consumer Rights Act 2015>

Trades Description Act 1968:

(The Act prohibits misdescriptions of goods, services, accommodation and facilities provided in the course of trade. It also forbids false or misleading indications as to the price of goods, and covers information used in advertisements)

<http://www.legislation.gov.uk/ukpga/1968/29-Trade Descriptions Act 1968>

Office of Fair Trading/ Trading Standards:

(The Office of Fair Trading closed on 1st April 2014, and its responsibilities have passed to a number of different organisations. Local Trading Standards offices are there to receive complaints about potentially illegal sales activity. Information can now be found on the Chartered Trading Standards Institute website)

<http://www.tradingstandards.uk>

Cancer Act 1939:

(It is a criminal offence to take any part in the publication of an advertisement containing any offer to treat any person for cancer, or to prescribe any remedy for it, or to give any advice in connection with the treatment of cancer)

<http://www..legislation.gov.uk/ukpga/Geo6/2-3/13/contents-Cancer Act 1939>

Medicines and Healthcare products Regulatory Agency (MHRA):

(Only homeopathic products and remedies licensed by the MHRA can be advertised to the public within specified limits. There are currently 27 products licensed for named minor self-limiting complaints and symptoms. The majority of remedies are unlicensed)

www.gov.uk/government/uploads/system/uploads/attachment_data/file/376398/Blue_Guide.pdf

Committees of Advertising Practice (CAP)/ Advertising Standards Agency (ASA):

(Any claims made about homeopathic remedies, treatment, services and their effect on symptoms and clinical conditions must be substantiated with evidence)

The Society of Homeopaths Code of Ethics, which requires members to comply with relevant law (revised August 2015)

Sections:

- 1.15 (Key principles for practice)
- 5 (Referrals)
- 38 -41 (Advertising and media)
- 42-44 (Potential misrepresentation)

What homeopaths may wish to include in their advertising

Section 1: On homeopathy

You are free to discuss the history and origins of homeopathy, its worldwide and historical usage, the philosophy and theory behind homeopathy, being careful not to criticise conventional medicine or make efficacy claims for homeopathy.

For example: Homeopathy is based on the principle of 'like cures like' – in other words, a substance taken in small amounts will cure the same symptoms it causes if it was taken in large amounts.

You can mention that there are some NHS-funded homeopathic hospitals and or describe the popularity of homeopathy or state who seeks homeopathic support (e.g. twice as many women as men, or 15% of patients in the UK are children).

Note: The word "cure" can only be used when talking about the theoretical principles of homeopathy, i.e. "like cures like".

Additional words / phrases you may like to use (*please note, these are not prescriptive, but put into context the types of acceptable terminology*)

- The name homeopathy was created by its originator Samuel Hahnemann and is derived from the Greek words for 'similar suffering' referring to the 'like cures like' principle of healing.



- Homeopathy doesn't separate the physical, emotional and mental symptoms, but takes the view that they are all interconnected. This is what makes homeopathy a truly holistic and refined art.
- Homeopathy is a well-regulated and safe form of medicine with little or no side effects.
- Homeopathy has been established and refined for over 200 years.
- Often people decide to try homeopathy when they feel they want to explore a natural and gentle alternative to drugs.

Section 2: Who you are

Accreditation and standards



accredited register

When it comes to who you are and the professional standards that underpin your RSHom title, you can emphasise your registration with the Society of Homeopaths, whose register is accredited by the Professional Standards Authority. You can also mention that members of the Society of Homeopaths adhere to a strict Code of Ethics and professional conduct.

On PSA accreditation: The words / phrases you may wish to use: *(please note, these are not prescriptive, but put into context the types of acceptable terminology).*

The following phrases have been taken directly from PSA accredited registers documentation:

- Accredited registers help people get better care by ensuring that the health practitioners on registers are competent and trustworthy.
- The PSA set standards for people working in unregulated health and care occupations and encourage them to meet them and take action to protect the public when necessary
- In homeopathy, our accredited register with the PSA means we work alongside employers, commissioners, local authorities, patient and consumer protection agencies as part of a quality assurance network.
- Being accredited enables you to feel confident that I'm competent and trustworthy.
- I take action to protect you from risk.
- I work alongside other agencies to improve standards.
- It is not compulsory, however I choose to be a part of an accredited register because it shows my commitment to homeopathy and makes me a part of a professional community that works to high standards and policies.
- I display the quality mark so you can be sure that I'm commitment to public safety has been verified by the Professional Standards Authority.

On your qualifications

Make the most of who you are, where and when you trained.

You can promote your history and background, your facilities and services, possibly how many patients you see (*keeping documented evidence of this audit data*).

You are free to include information about any other therapies you are qualified in.

Additional words / phrases you may wish to use: (*please note, these are not prescriptive, but put into context the types of acceptable terminology*)

- I am registered with the Society of Homeopaths, and carry the title RSHom.
- I work as part of a multi-disciplinary practice, or qualified in (list therapies).
- I have worked for X years in complementary alternative therapies or as a homeopath.
- I am a qualified and experienced practitioner.
- I am fully insured.
- I only use the 'highest quality homeopathic products'.

Section 3: What you do

The treatment/ services that you offer

You can use your advertising to explain what happens during a consultation and what patients can expect.

Make it clear when you are available for appointments, how to contact you between appointments, any additional support you may offer (e.g. via the telephone).

Your fees must be clear and unambiguous including whether or not remedies are included in the fee.

If you provide a number of different therapies, ensure that the distinction between them is clear or what integrated package of care a patient could be 'signing up' for by contacting you and engaging your services.

You can state that homeopathy is safe to use alongside conventional treatments, whilst being careful not to suggest or imply that it is safe to use *instead* of essential conventional medical treatment, (CoE s41).

You may want to mention that homeopathy is ideal for patients looking for "holistic options" or a "holistic approach to enhance their wellbeing"

Ensure you phrase statements about the possible outcome of receiving homeopathic treatment in terms of supporting, enabling and enhancing wellbeing.

Encourage patients to seek independent medical advice and stay in close contact with their mainstream healthcare professionals.

Encourage an open dialogue, patient choice and informed, integrated healthcare.

Words / phrases likely to be acceptable on the services you offer: *(please note, these are not prescriptive, but put into context the types of acceptable terminology)*

- Homeopathy is ideal for those who want to explore a holistic approach to enhance their wellbeing.
- The philosophy behind homeopathy is that by restoring the balance of our body, mind and spirit we can achieve good health and well-being.
- Therapy sessions / consultations are comfortable and relaxing.
- Remedies will not interfere with the action of any medicines prescribed by a doctor.
- I will assess you holistically, looking at the whole picture.
- The aim of homeopathy is to bring about wellbeing.
- Homeopathic remedies are gentle and can be used alongside conventional medicine.
- The remedy you are prescribed will be bespoke and tailored to meet your needs.
- Remedies will be prescribed following the consultation.
- All medicinal products from UK pharmacies are registered.
- During a consultation, I gain a thorough understanding of your health and the exact symptoms you are experiencing, so I they can prescribe a homeopathic remedy which matches you and your symptoms as closely as possible.
- This first consultation will usually take between one and two hours. You will be asked many questions and some of them may seem strange for those not used to homeopathy. The reason for this is that as a practitioner I am building a picture of your unique make up, a bit like putting together a jigsaw puzzle.
- Follow up consultations will usually be around four weeks after the first prescription, although in some cases it may be sooner. The session may be shorter, and I will ask about changes that have occurred, before deciding on the next step in your treatment.

On remedies:

You can describe what ingredients are used in remedies, how they are made and their quality. If you talk about remedies, materia medica and how to match problems to a remedy picture, only choose examples from the list of remedies licensed by the MHRA.



Words / phrases likely to be deemed compliant when describing remedies: *(please note, these are not prescriptive, but put into context the types of acceptable terminology)*

- Homeopathic medicines are manufactured using a process combining serial dilution and succussion (vigorous shaking).
- Homeopathic medicines are made mainly from plants and minerals, then highly diluted before adding to lactose tablets or sucrose pills.
- I will prescribe your remedy following the consultation. It will be given in tablet, pillule, liquid or occasionally powdered form.
- Remedies prescribed in homeopathy are non-addictive.
- Homeopathic treatment has an excellent safety record and because homeopathic medicines are non-toxic, they can be used by babies, children and during pregnancy.

Note: Avoid discussing remedies in terms of “what they can be used for” as this increases the risk of making an unintended efficacy claim.

Named conditions and symptoms

If you have a special area of interest or passion you can mention it in your marketing.

You can also mention conditions in the context of who seeks homeopathic support as long as you have substantiating evidence (e.g. eczema is one of the most frequent complaints in a homeopathic outpatient clinic in the Bristol Homeopathic Hospital).

The following terms in the table below are likely to be acceptable however, be careful about the context the words are used and efficacy claims.

Acceptable Terms	Things to be avoided when using these terms
Habits	Specific habits and addictions should be avoided, including smoking and alcohol.
Cravings	Specific cravings and addictions should be avoided, including smoking and alcohol.
Fixations	Specific conditions associated with fixations such as OCD, or symptoms of such diseases such as repetitive behaviours for example should be avoided.
Weight management	Avoid saying a remedy will directly result in weight loss.
Weight related issues	Avoid saying a remedy will result in weight loss.
Urges	Specific urges such as sexual, alcohol should be avoided, also those associated with specific disease should be avoided, for example the urge to swear may be understood to be referring to addictions or Tourettes.

Relationship problems	Avoid saying a remedy will result directly improve relationship problems.
Sexual counselling	Avoid saying a remedy will result directly improve relationship problems.
Tension	Ensure you refer to everyday tension, rather than specifically being as a result of stress.
Concentration	Care should be taken to ensure that concentration as a symptom of a serious condition such as ADD and ADHD should not be implied.
Everyday stresses/stressors/ Day to day stresses	Acceptable over the direct use of the word 'stress'.

Additional practical words that help describe homeopathy:

The following words allow context to be added to the agreed acceptable terms to further describe homeopathic services. Its purpose is to expand the acceptable terminology and can be used to create links.

<i>Support with</i>	<i>Worry</i>
<i>Management of</i>	<i>Upset</i>
<i>Offer help with</i>	<i>Distress</i>
<i>Issues with</i>	<i>Comfort from</i>
<i>Problems with</i>	<i>Assistance with</i>
<i>Suffering from</i>	<i>Advice about</i>
<i>Struggling with</i>	<i>Guidance with</i>
<i>Trouble with</i>	<i>Relaxation</i>
<i>Discomfort</i>	<i>Lifestyle</i>
<i>Concern</i>	

Here are some examples of the above words in put into sentences: *(please note, these are not prescriptive, but put into context the types of acceptable terminology)*

- Homeopathy can be used to support weight management.
- Are you suffering from every day stresses? How about trying homeopathy?
- I support people suffering relationship problems.
- Are you feeling distressed or worrying about something? I can help.
- Homeopathy can aid relaxation and relieve tension.
- My particular area of passion is supporting those experiencing cravings and urges.
- I can offer advice and support you with issues associated with tension and/ or concentration.
- Talk to me about your lifestyle and everyday stressors.
- Would you like to lead a more relaxed lifestyle and improve your wellbeing?
- I can offer help with relationship problems and sexual counselling.

For further guidance on words and phrases deemed non compliant to CAP in advertising, please see the following link:

<https://www.cap.org.uk/~media/Files/CAP/Advertising%20Guidance/Health%20beauty%20slimming%20and%20medical%20conditions.ashx>

Testimonials

When referring to testimonials, it is wise to encourage people to seek independent medical advice and stay in close contact with their mainstream healthcare professionals. This supports an open dialogue, choice and informed, integrated care.

The below was agreed by the Preliminary Investigation Panel, the Professional Standards Authority have also seen this statement, and appear happy with its use.

Testimonials:

'The following statements from patients do not represent evidence that homeopathy works, but are the personal opinions of people whom homeopathy has helped. I am not allowed by the Advertising Standards Authority to imply that homeopathic treatment can help any specific medical conditions'.

'I would like to make it clear that these statements are not meant to imply that a particular homeopathic remedy can cure a specific medical condition. This is not how I believe that homeopathy works. You may however note from these unedited comments that people who have been diagnosed with a wide range of medical conditions have reported that they have experienced an apparent benefit from homeopathy'.

Please note: Any claims made within a testimonial are subject to the CAP Code. Therefore, if a testimonial makes an efficacy claim, the author's permission should be sought to edit out the relevant parts.

Further support and guidance:

Should you require further guidance on advertising please access our website at: <http://www.homeopathy-soh.org/about-the-society/professional-conduct>

Or to read further guidance by CAP, please visit their website on <https://www.cap.org.uk/>. Or follow CAP on Twitter (@CAP_UK) as any updates to guidance are tweeted to our followers.