

EXPLANATORY GUIDANCE TO THE PRIVATE HOSPITALS AND MEDICAL CLINICS (ADVERTISEMENT) REGULATIONS 2019

Effective from 15 April 2019

Preamble

From 15 April 2019, licensees of healthcare institutions (“HCIs”) licensed under the Private Hospitals and Medical Clinics Act (“PHMCA”) are required to comply with the Private Hospitals and Medical Clinics (Advertisement) Regulations 2019 (“Advertisement Regulations”) in advertising their healthcare services. The Private Hospitals and Medical Clinics (Publicity) Regulations (2004) (“Publicity Regulations”) are revoked.

The main objective of replacing the Publicity Regulations with the Advertisement Regulations is to provide greater clarity to licensees through an updated regulatory framework that takes into account the emergence of more creative and innovative ways to advertise healthcare services, such as through social media. One key change is to clarify that the Advertisement Regulations apply to “advertisements”, which are intended to promote the HCIs’ services, rather than “publicity”, which merely provides information about HCIs’ services and is not designed to promote the use/consumption of the HCIs’ services. The Advertisement Regulations make it clear that advertisements by HCIs must not create unrealistic expectations of the services provided, or induce unnecessary consumption of healthcare services. The information in HCIs’ advertisements should only inform the public of the HCIs’ services, so as to enable the public to have a better understanding of their services and available options and, consequently be able to arrive at a more informed decision on their healthcare choices.

This Explanatory Guidance (“EG”) explains the principles underpinning the Advertisement Regulations, and is intended only as general guidance. The EG should be read in conjunction with the Advertisement Regulations, which can be found at [\[https://sso.agc.gov.sg/SL-Supp/S382019/Published/20190115?DocDate=20190115\]](https://sso.agc.gov.sg/SL-Supp/S382019/Published/20190115?DocDate=20190115), and the Advertisement Regulations take precedence in the event of any inconsistency.

Licensees should consult their legal or other professional advisers if they require specific advice.

Licensees of HCIs are ultimately responsible, and will be held accountable, for all advertisements associated with their respective HCIs. Hence, all licensees should familiarise themselves with the Advertisement Regulations and EG, and comply with them at all times.

Table of Contents

1. Scope	5
2. Factual information	5
3. Advertisement Platforms	6
4. Display of accreditation, certificates or awards.....	8
5. Specific Requirements for the Content of Advertisements.....	9
5.2. <i>Advertisements must be factually accurate and capable of being substantiated</i>	9
5.3. <i>Advertisements must not be offensive, ostentatious or in bad taste</i>	10
5.4. <i>Advertisements must not create unjustified expectations, etc.</i>	10
5.5. <i>Advertisements must not contain “before & after” or only “after” treatment picture.</i>	11
5.6. <i>Advertisements must not contain laudatory statements, etc.</i>	12
5.7. <i>Advertisements must not contain testimonials or endorsements</i>	15
5.8. <i>Advertisements must not solicit or encourage the use of the HCI’s services</i>	16
6. Hyperlinks	18
7. Particular factual scenarios	20
7.1. <i>Interviews</i>	20
7.2. <i>Filming on HCIs’ premises</i>	20
7.3. <i>Public workshops, seminars or symposiums</i>	21
8. Participation in Public Schemes.	22
9. Contributions to good causes and participation in Corporate Social Responsibility (CSR) initiatives	25
10. Advertising in conjunction with any person	26
11. Advertisements outside Singapore	26
12. Summary of Licensees’ Responsibility	27
13. Decision Tree to determine if an Advertisement is in Compliance.....	28
14. Contact Us	30

1. Scope

1.1. The Advertisement Regulations regulate advertisements by private hospitals (including nursing homes), medical and dental clinics, and clinical or radiological laboratories. They also cover advertisements by third parties (e.g. influencers) on behalf of and/or in collaboration/conjunction with HCIs.

1.2. Advertisements by persons not licensed under the PHMCA, such as beauty and wellness establishments, are not regulated under the Advertisement Regulations. However, they must comply with all applicable legislation such as the Medicines (Advertisements and Sale) Act.

1.3. To avoid doubt, licensees of HCIs must also comply with all other applicable legislation regulating their advertisements, including the Medicines Act and Health Products Act. Healthcare professionals should also comply with their professional/ethical codes and ethical guidelines¹.

2. Factual information

2.1. As stated above, the Advertisement Regulations regulate information that promotes HCIs' services. A mere list of factual information relating to HCIs' services (akin to that of information in a directory, as listed below) would not be considered to be an "advertisement" for the purpose of the Advertisement Regulations:

- (a) name, logo, address, website / social media address and contact details of the HCI;
- (b) operating hours of the HCI;
- (c) services provided by the HCI, such as;
 - (i) name of the healthcare professional(s) providing services at the HCI;
 - (ii) his registered professional qualification(s);
 - (iii) his professional title(s) reflecting the register(s) in which he is registered;

¹ "Advertising: G" of Singapore Medical Council, *Ethical Codes and Ethical Guidelines 2016*; "Information on Dentists' Services: 4.4" of Singapore Dental Council, *Ethical Code and Guidelines 2006*



- (iv) his displayable qualification(s) accepted and recognised for display by the relevant professional bodies;
- (v) his title or designation at the HCI; and
- (d) price of the services provided by the HCI.

3. **Advertisement Platforms**

Regulation 5(1):

The licensee of a healthcare institution must ensure that any advertisement that is not displayed within the premises of the healthcare institution and that is about the healthcare institution's services appears only in newspapers, directories, medical journals, magazines, brochures, leaflets, pamphlets and the Internet.

Regulation 5(2):

However, Regulation 5(1) does not prohibit a licensee from affixing any advertisement to any door, fence, grille, partition, wall or window of the healthcare institution's premises even if the advertisement is visible to any person from outside those premises.

Regulation 5(3):

To avoid doubt, any advertisement that is displayed within the premises of a healthcare institution may appear in any form or medium.

Regulation 5(4):

The licensee of a healthcare institution must not advertise the services of the healthcare institution —

- (a) by sending any advertisement to an individual through push technology; or
- (b) by distributing or giving, free of charge, any advertising material to an individual,

unless the licensee has obtained the prior written consent of that individual to do so.



Regulation 5(5):

Where an advertisement of the services of a healthcare institution appears on the Internet, the licensee of the healthcare institution must ensure that the Internet is not used for patient consultation with any employee of the healthcare institution if the patient is not an existing patient of the healthcare institution.

Regulation 5(6):

Where an advertisement of the services of a healthcare institution appears in a brochure, leaflet or pamphlet, the licensee of the healthcare institution must ensure that the brochure, leaflet or pamphlet contains the date of publication.

3.1. Licensees must **only** use the eight advertising media listed in regulation 5(1) outside their premises. All other advertising media are not allowed, including SMS text messaging, television screens, billboards, light boxes, digital media boxes, LCD / LED panels, banners and posters.

3.2. However, licensees may advertise using any medium **within** their physical premises. To avoid doubt, the content of licensees' advertisements must comply with regulation 4 of the Advertisement Regulations, even where they are only put up within HCIs' premises. This is elaborated in paragraphs 5.2 to 5.8.

3.3. Licensees may advertise on the internet through YouTube, and social media platforms such as Facebook, Instagram and blogs. However, the content of such advertisements must comply with Regulation 4 of the Advertisement Regulations.

3.4. Licensees must not give or distribute physical advertising material free of charge, such as by inserting brochures, leaflets and pamphlets etc. into mail boxes, or through push technology such as SMS, MMS, WhatsApp, and Facebook messenger, **without first obtaining prior written consent** from the recipients.

3.5. To avoid doubt, Search Engine Optimisation (SEO) and Search Engine Marketing (SEM) are not considered to be push technology under regulation 5(4)(a) of the Advertisement Regulations.



3.6. Licensees must ensure that their brochures, leaflets and pamphlets state the date of publication.

3.7. Where a licensee gives valuable consideration of any kind to any person or organisation to advertise for it in any advertising media, the advertisement would be considered to be the HCI's advertisement for the purpose of the Advertisement Regulations.

4. Display of accreditation, certificates or awards

Regulation 11(1):

Except as provided in Regulation 11(2), the licensee of a healthcare institution must not display, or publish, disseminate or convey any information relating to, any accreditation or certification or award conferred on the licensee's healthcare institution.

Regulation 11(2):

The licensee of a healthcare institution may display, or publish, disseminate or convey any information relating to, an accreditation, a certification or an award mentioned in regulation 11(1) only —

- (a) within the premises where the services of that healthcare institution are provided; and
- (b) on that healthcare institution's website and account on any social media or social network service.

Regulation 11(3):

To avoid doubt, an accreditation, a certification or an award conferred on a healthcare institution does not include any professional qualification that is conferred on a healthcare professional providing a healthcare service for and on behalf of that healthcare institution.



4.1. Other than within the HCIs' physical premises and on their websites and social media accounts, licensees must not display, publish, disseminate or convey any information relating to any accreditation, certification or award conferred on their HCIs in any media. Examples of accreditations, certifications or awards conferred on HCIs include accreditation by the Joint Commission International (JCI), and ISO certification.

4.2. Accreditations, certifications or awards do not include professional qualifications conferred on healthcare professionals, such as professional registration certificates and certificates of competence for experience or expertise in procedures.

4.3. To avoid doubt, the display, publication, dissemination and conveyance of any information relating to any accreditation, certification or award within the physical premises of the HCIs and/or on HCIs' websites or social media accounts must comply with regulation 4 of the Advertisement Regulations and must not, for example, be exaggerated, false, misleading or deceptive.

5. Specific Requirements for the Content of Advertisements

5.1. Licensees must ensure that their advertisements comply with regulation 4 of the Advertisement Regulations.

5.2. Advertisements must be factually accurate and capable of being substantiated

Regulation 4(1)(a):

The information contained in the advertisement must be factually accurate and capable of being substantiated, and must not be exaggerated, false, misleading or deceptive.

5.2.1. All information² contained in advertisements must be factually accurate and capable of being substantiated at the point when they are published, disseminated

² Which includes all claims, assertions and statement etc. in the advertisement.

and/or conveyed (i.e. there must be sufficient evidence to support and validate the said information).

5.2.2. “Evidence” in this context refers to credible and authoritative sources, such as articles published in peer-reviewed journals in PubMed (in the medical / dental fields) and other literature recognised and accepted by the local medical / dental community as being credible or authoritative. These sources should be cited in licensees’ advertisements, and provided to the Ministry of Health (MOH) upon request. If a licensee does not provide MOH with the required evidence and information, the licensee may be found to have contravened Regulation 4(1)(a).

5.3. *Advertisements must not be offensive, ostentatious or in bad taste*

Regulation 4(1)(b):

The advertisement must not —

- (i) be offensive, ostentatious or in bad taste; or
- (ii) undermine the honour and dignity of the medical, dental or nursing profession.

5.3.1. Advertisements must not contain any words, statements, images, or any other information that are demeaning, provocative, distasteful, indecent and/or would undermine the honour and dignity of the medical, dental or nursing profession. For example, advertisements should not contain nudity.

5.4. *Advertisements must not create unjustified expectations, etc.*

Regulation 4(1)(c):

The advertisement must not contain any information that —

- (i) implies that the healthcare institution can obtain results from treatment not achievable by other healthcare institutions or create an unjustified expectation from the treatment provided; or
- (ii) compares and contrasts the quality of the services of the healthcare institution with those provided by other healthcare institutions or deprecate the services of other healthcare institutions.



5.4.1. Advertisements must not contain information that creates unjustified expectations of the treatments provided by HCIs. As an example, advertisements containing statements that a HCI's treatment can achieve results within a fixed (generally short) time period or a specified number of sessions, e.g., "instant / immediate teeth whitening", "straight teeth in 2 weeks", "see results after 1 treatment session", would generally create unjustified expectations as not all patients can achieve or experience the same results within the same time period.

5.4.2. Advertisements must not contain information, such as statements, images, tables, and/or videos that compares and contrasts the quality, results and/or outcomes of an HCI's treatment and services with those provided by another HCI(s). For example, an advertisement must not claim or imply that a person will look better, be healthier or less ill, or be in a better state of general well-being after receiving the HCI's services, rather than the services of another HCI(s).

5.5. Advertisements must not contain "before & after" or only "after" treatment picture.

Regulation 4(1)(d):

The advertisement does not contain any photograph, picture, video or film showing the appearance or a feature of a person before and after, or only after, receiving any treatment —

- (i) whether or not the photograph, picture, video or film creates an unjustified expectation from the treatment provided; and
- (ii) whether all the photographs, pictures, videos or films relating to the same treatment are contained in one advertisement or more than one advertisement.

Regulation 4(2):

To avoid doubt, nothing in Regulation 4(1)(d) prohibits a licensee from showing to a patient of the licensee's healthcare institution, during a consultation by the



patient at the premises of that healthcare institution, any photograph, picture or video or film that shows the appearance or a feature of any person before and after receiving any treatment from that healthcare institution.

5.5.1. Advertisements must not feature “before-and-after” or only “after” treatment photographs, pictures, videos or films.

5.5.2. To avoid doubt, “before-and-after” or only “after” treatment photographs, pictures, videos and films must not be featured, even with disclaimers in HCIs’ advertisements.

5.5.3. Such “before-and-after” or only “after” treatment photographs, pictures, videos and films relating to a HCI’s treatment may be shown to patients during their consultation at the HCI’s premises. During the consultation, proper context should be provided to the patients by the HCI’s healthcare professionals, who should properly explain and clarify the possible outcomes of the HCI’s treatment.

5.6. *Advertisements must not contain laudatory statements, etc.*

Regulation 4(1)(e):

The advertisement must not contain any laudatory statement (including a statement of prominence or uniqueness) or superlative to describe the services of the healthcare institution.

5.6.1. Advertisements must be factually accurate, and must not contain laudatory statements such as subjective praises, commendations and compliments. Table 1 sets out a list of terms that are likely to be regarded as laudatory:

Table1: List of Laudatory Terms

Laudatory Terms starting with A-F	Laudatory Terms starting with G-N
Advanced e.g. technology, method, precision;	Ground breaking e.g. work, procedure;



• Always at the forefront; • Astounding level of accuracy; • Best e.g. options, available techniques; • Better; • Brand new; • Breakthrough; • Centre of excellence; • Champions; • Choice/only choice; • Consistently accurate; • Cutting-edge; • Excellent; • Exceptional outcomes; • Exclusive; • Extensive experience; • Extremely e.g. high degree, high degree of surgical control, precise; • Fastest, e.g. growing segment; • First e.g. in the world, in Asia, breakthrough, of its kind, and only, generation; • Five star services; • Forefront; • Fully experienced;	• Gold standard; • Greater / Greatest e.g. accuracy, precision; • Highest e.g. safety, success rate; • Highest volume e.g. surgeon, precision; • Highly e.g. sophisticated, skilled and experienced, experienced, trained staff, sophisticated, resolution available, precise, accurate; • Improved e.g. method; • Industry leader; • International reputation; • Internationally renowned; • Latest e.g. version, technology, innovations, evolution, breakthrough; • Leads the industry; • Leader • Leading; • More or Most e.g. efficient, established, recent, advanced, sophisticated technology, significant, up-to-date, accurate; • Mother of all [medical/ dental product/ service];
--	---



	• New e.g. developments, frontiers, methods, generations, treatment, technique, level; • Newly evolved; • Next generation; • Number 1 / One;
Laudatory Terms starting with O-R	Laudatory Terms starting with S-Z
• Only e.g. expert, key opinion leader; • Outstanding e.g. accuracy, precision; • Pioneer e.g. experience; • Pioneered; • Pioneering; • Precise; • Premier; • Premium e.g. medical products; • Recognised and trusted name, brand; • Remarkable; • Renowned; • [Medical / dental product/ service] revolution; • Revolutionary e.g. technique;	• Safest e.g. option, technology; • Smoother; • Spectrum of cutting-edge; • State-of-the-art e.g. technology; • Superior e.g. speed, outcomes; • Thinnest possible; • Tomorrow's solution; • Top [medical / dental speciality] doctor; • Trail blazing; • Ultimate; • Ultra e.g. precise, safe; • Uncompromised e.g. treatment, outcomes; • Unmatched; • Vast experience; • Wealth of experience;



• Representative e.g. beginning of a new era, the next generation; • Rich/richer experience;	• Well-established; • Whiter; • Wide/widest experience; • World's e.g. most advanced, fastest, pioneer
--	--

5.7. *Advertisements must not contain testimonials or endorsements*

Regulation 4(1)(f):

Except as provided in regulation 12, the information contained in the advertisement must not contain any testimonial or endorsement about the services of the healthcare institution, including the services of any employee of the healthcare institution.

Regulation 12(1):

The licensee of a healthcare institution must not display, publish or disseminate a testimonial or an endorsement by any person about the services of the healthcare institution, including the services of any employee of the healthcare institution, unless the testimonial or endorsement —

(a) is displayed, published or disseminated —

(i) within the premises where the services of that healthcare institution or employee are provided; or

(ii) on that healthcare institution's website or account on any social media or social network service; and

(b) was given by the person directly to the licensee and is not reproduced by the licensee.

Regulation 12(2):

The licensee of a healthcare institution may publish any testimonial or endorsement about the services mentioned in Regulation 12(1) in any of the



healthcare institution's corporate publications that is disseminated or distributed only to the licensee's employees.

5.7.1. Patients, caregivers or members of the public may provide direct feedback (through testimonials and/or endorsements) on a HCI's services³, on its premises (e.g. on the board inside a clinic's waiting area), website or social media accounts. Such feedback may also be provided on the websites or social media accounts of patients, caregivers and members of the public. Licensees and healthcare professionals must not coerce or offer valuable consideration of any kind to induce patients, caregivers or members of the public to provide testimonials and/or endorsements.

5.7.2. Licensees must not reproduce any testimonials and/or endorsements about their services on any advertising media, other than the HCIs' own corporate publications that are disseminated or distributed only to their employees. Testimonials and endorsements by non-celebrities will not be treated differently from testimonials and endorsements by celebrities.

5.8. *Advertisements must not solicit or encourage the use of the HCI's services*

Regulation 4(1)(g):

The advertisement must not provide information to the public in such a manner as to amount to soliciting or encouraging the use of the services provided by or at any healthcare institution.

Regulation 13(1):

The licensee of a healthcare institution must not advertise any programme —

(a) under which a gift (whether in the form of a good or service) or other benefit may be obtained by a patient of the healthcare institution on the basis of the amount or type of service purchased from the healthcare institution —

³ Which includes the services provided by any employee of the HCI.



- (i) whether or not the programme extends to the purchase of other services; and
 - (ii) whether or not the patient may accept another gift; and
- (b) for which the purpose is to solicit or encourage the consumption of the services of the healthcare institution.

Regulation 13(2):

This regulation does not apply to the advertising of any of the following:

- (a) a programme that is available to patients of the healthcare institution only at its payment counter offering a payment plan for the purchase of the healthcare institution's services

5.8.1. Advertisements must not contain information which solicits or encourages the use of an HCI's services. Examples of advertisements that solicit or encourage the use of the HCI's services includes:

- (a) "Before-and-after" treatment photos (see paragraph 5.5); and
- (b) Information that promises or suggests that the services can bring about results within a certain time period, e.g., "Instant / immediate teeth whitening", "straight teeth in 2 weeks", etc. (see paragraph 5.4)

5.8.2. Examples of information that solicit or encourage the use of HCIs' services are "promotions" which refer to free or discounted services or products provided at or by HCIs, or interest-free payment plans for HCIs' services. Further examples include, but are not limited to advertisements with:

- (a) "Usual" vis-a-vis "Now" and "Package" prices for the same or a group of services provided by the HCIs (Licensees must only list the exact prices of their HCIs' services, without indicating any prefix or description to the prices, and without a comparative listing of prices);
- (b) Phrases such as "As low as", and "Lowest prices" when describing the price of HCIs' services, or stating an instalment amount for the services without stating the total price;

- (c) Preferential prices for HCIs' services with a "validity period";
- (d) Any services provided at or by HCIs that are free of charge or at a lower cost than usual, in connection with any other services advertised by the HCI;
- (e) Words or phrases such as "discount", "interest free", "preferential rate", "promotion", "offer", "complimentary", "free" or other words or phrases to the same effect;
- (f) Information on group buying websites or websites that offer lower prices through collective group buying of HCIs' services; or
- (g) Giveaways, lucky draws, prizes, gifts and/or freebies, whether related or otherwise to the HCI's services.

5.8.3 Patients may be informed of an HCI's payment plans (e.g. instalments, package prices) at the HCI's payment counter.

6. Hyperlinks

Regulation 14(1):

Subject to Regulation 14(2), the licensee of a healthcare institution must not publish on the healthcare institution's website a hyperlink to any other website that —

- (a) contains information that is not factually accurate or capable of being substantiated, or is exaggerated, false, misleading or deceptive;
- (b) is offensive, ostentatious or in bad taste, or undermines the honour and dignity of the medical, dental or nursing profession;
- (c) contains information that —
 - (i) implies that the healthcare institution can obtain results from treatment not achievable by other healthcare institutions or create an unjustified expectation from the treatment provided; or
 - (ii) compares and contrasts the quality of the services of the healthcare institution with those provided by other healthcare institutions or deprecates the services of other healthcare institutions;
- (d) contains any photograph, picture, video or film showing the appearance or a feature of a person before and after, or only after, receiving any treatment —



- (i) whether or not the photograph, picture, video or film creates an unjustified expectation from the treatment provided; and
- (ii) whether all the photographs, pictures, videos or films relating to the same treatment are contained in one advertisement or more than one advertisement;
- (e) contains any laudatory statement (including a statement of prominence or uniqueness) or superlative to describe the services of the healthcare institution;
- (f) except as provided in regulation 12, contains any testimonial or endorsement of the services of the healthcare institution, including the services of any employee of the healthcare institution; or
- (g) provides information to the public in such a manner as to amount to soliciting or encouraging the use of the services provided by the healthcare institution or at the premises of the healthcare institution.

Regulation 14(2):

Regulation 14(1) does not apply if at the time of setting the hyperlink to a website, the licensee does not know, or has no reason to believe, that that website is a website mentioned in Regulation 14(1)(a) to (g).

Regulation 14(3):

Where the licensee of a healthcare institution becomes aware of any hyperlinked website mentioned in Regulation 14(1)(a) to (g), the licensee must immediately remove from the healthcare institution's website the hyperlink to that website.

6.1. Licensees must ensure that the hyperlinks on their respective HCIs' websites do not lead to other websites that contravene regulations 14(1)(a) to (g) of the Advertisement Regulations.

6.2. Where a licensee becomes aware of a hyperlink on any of its HCI's websites that lead to another website that contravenes regulations 14(1)(a) to (g), the licensee must remove the hyperlink immediately.

7. Particular factual scenarios

7.1. Interviews

Regulation 7(1):

The licensee or an employee of a healthcare institution may, at the request of any print or broadcast media organisation, consent to be interviewed.

Regulation 7(2):

The licensee of a healthcare institution must ensure that any information provided in an interview by the licensee or an employee of the healthcare institution which relates to any advertisement of the services of the healthcare institution complies with regulation 4.

7.1.1. When being interviewed, licensees or employees of HCIs must provide factually accurate information which complies with regulation 4 of the Advertisement Regulations (see paragraphs 5.2 to 5.8), as well as the applicable professional ethical codes and ethical guidelines.

7.2. Filming on HCIs' premises

Regulation 9(1):

The licensee of a healthcare institution must ensure that neither the licensee nor an employee of the healthcare institution solicits to participate in any filming on the premises of the healthcare institution.

Regulation 9(2):

Where filming is done on the premises of a healthcare institution, the licensee of the healthcare institution must ensure that only the name of the healthcare institution is shown in the closing credits of the film as a form of acknowledgment.

7.3. Public workshops, seminars or symposiums

Regulation 10:

The licensee of a healthcare institution may advertise any public workshop, seminar or symposium organised by the healthcare institution.

7.3.1. Licensees may advertise events organised by their HCIs, such as workshops, seminars, symposium or talks. Licensees of HCIs must confine the advertisement of such events to information that is factual, and only provide information such as:

- (a) Title and synopsis;
- (b) Information on the speakers:
 - (i) names;
 - (ii) registered professional qualification(s);
 - (iii) professional title(s) reflecting the register(s) in which the speakers are registered (if any);
 - (iv) qualification(s) accepted and recognised for display by the relevant professional bodies (if any);
 - (v) the name(s) of the place(s) of practice;
- (c) details of the programme and timing;
- (d) venue and contact information for the event;
- (e) fees and charges that may apply, the period for which these fees and charges are applicable and the accepted mode of payment; and
- (f) the name(s) and details of the organizer(s) and / or sponsor(s).

7.3.2. At the public talks, workshops or symposiums, licensees must ensure that the materials distributed only contain factually accurate information which complies with the Advertisement Regulations (see paragraphs 5.2 to 5.8), and do not promote the HCIs' services.



7.3.3. Regulation 10 of the Advertisement Regulations only applies to public workshops, seminars or symposiums, and do not apply to similar events that are intended only for registered healthcare professionals and not members of the public.

8. Participation in Public Schemes

Regulation 13(1):

The licensee of a healthcare institution must not advertise any programme —

(a) under which a gift (whether in the form of a good or service) or other benefit may be obtained by a patient of the healthcare institution on the basis of the amount or type of service purchased from the healthcare institution —

(i) whether or not the programme extends to the purchase of other services; and

(ii) whether or not the patient may accept another gift; and

(b) for which the purpose is to solicit or encourage the consumption of the services of the healthcare institution.

Regulation 13(2):

This regulation does not apply to the advertising of any of the following: ...

(b) a programme that is funded (in whole or part) or endorsed by the Government or the Health Promotion Board, relating to health screening;

(c) a programme that is initiated by the Government relating to any public scheme; ...

8.1. Examples of “public schemes” under the Advertisement Regulations include Community Health Assist Scheme (CHAS), Screen for Life (SFL), and Public Assistance:

CHAS Blue 	CHAS Orange 
CHAS for Pioneer Generation 	
	

8.2. Licensees of HCIs participating in national schemes administered by public authorities (including the Health Promotion Board), such as Medisave for Chronic Disease Management Programme (CDMP), Community Health Assist Scheme (CHAS), Screen for Life (SFL) and Pioneer Generation Package, should only use the publicity materials or templates provided by the relevant public authorities when advertising their services under the schemes.



8.3. Licensees must ensure that all their advertising collaterals are factually accurate, do not contain promotional elements and comply with regulation 4 of the Advertisement Regulations (see paragraphs 5.2 to 5.8).

Examples of public schemes funded or endorsed by

Government or Health Promotion Board

CHAS COMMUNITY HEALTH ASSIST SCHEME

Use your Health Assist card to enjoy subsidies at General Practitioner (GP) and dental clinics near your home under the Community Health Assist Scheme (CHAS).

Have you applied a renewed your Health Assist card yet?

Pioneers can apply but those who qualify can enjoy higher subsidies at subsidised SOCs* on top of their Pioneer card benefits.

When I am sick, I prefer to see my regular family doctor, whom I am familiar with.

Grandma says that it is more affordable to visit her doctor with CHAS!

Pick up an application form at any Community Club/Centre, Public Hospital or Polyclinic.

TO QUALIFY FOR CHAS:

- Singapore Citizen
- Household monthly income per person** is \$1,800 and below (for households with income)
- Annual Value (AV)* of home is \$2,000 and below (for households with no income)

* Annual Value (AV) is the value of the land and building as assessed by the Valuation Department. It is not the same as the market value of the property. ** Household monthly income per person is calculated by dividing the total monthly income of the household by the number of persons in the household. For more information, visit www.chas.sg

For more information:
1800-275-2427 (1800-ASH-CHAS)
www.chas.sg

9 WAYS YOU CAN USE YOUR Medisave

- When you welcome your little baby: Recommended screening tests, vaccinations and chronic disease treatments
- To stay healthy: Recommended screening tests, vaccinations and chronic disease treatments
- To pay for insurance premiums: For MediShield Life, integrated Shield Plus and MediShield
- When you need repeated treatment: For surgery or hospitalisation
- When the doctor advises you to go for a scan: For rehabilitation and recovery (Stay at a community hospital or rehabilitation at a day rehabilitation centre)
- When you fall ill in old age: For end-of-life care (Palliative care at a hospice, or at home in the company of your loved ones)

Check with your service provider if you would like to use Medisave to pay for your treatment. Visit www.moh.gov.sg for more information.

Screen for Life at CHAS GP Clinics

SCREEN FOR LIFE at CHAS GP Clinics

AGE	SCREEN FOR	HOW OFTEN
50 years and above*	Colorectal cancer	One year from your last screening date
40 years and above	Chronic diseases (Obesity, diabetes, high blood pressure, high blood cholesterol)	Three years from your last screening date
25 years and above*	Cervical cancer (For women who have ever had sex)	Three years from your last screening date

FEES:

Category	Fee
PIONEER GENERATION	\$0
HEALTH ASSIST (CHAS) CARD HOLDERS	\$2
ELIGIBLE SINGAPORE CITIZENS	\$5

The fee covers the cost of the tests and doctor consultation for your visit, and the first follow-up consultation, if required.

*You need not screen again if you have been screened within the recommended frequency or have already been diagnosed with any of the conditions above. Instead, please see your doctor regularly to monitor your condition.

*If you are between 18 - 39 and are found to be "at higher risk" after completing the Diabetes Risk Assessment (DRA), it is recommended that you screen for diabetes (and other chronic diseases). The above subsidy and age also applies to you, and you will receive an invitation to go for screening.

**Women 50 years or above can also enjoy subsidised screening for breast cancer at participating Screen for Life BreastScreen Singapore screening centres.

Visit screenforlife.sg or call 1800-223-1313 to find out more.



Enjoy your
Pioneer Generation
benefits here!



General Enquiries:
1800-2222-888

Healthcare Enquiries:
1800-650-6060

www.pioneers.sg



9. Contributions to good causes and participation in Corporate Social Responsibility (CSR) initiatives

Regulation 8:

Where the licensee of a healthcare institution contributes to any good cause in the name of the healthcare institution, whether by way of donation, sponsorship or subscription, the licensee must ensure that any public acknowledgment of the contribution by the recipient does not state any information pertaining to the healthcare institution except the name of the healthcare institution.

Regulation 13(2):

This regulation does not apply to the advertising of any of the following:...

(d) a corporate social responsibility programme undertaken by the licensee of the healthcare institution that satisfies all of the following conditions:

- (i) every advertisement of the programme must specify that the advertisement is in relation to a corporate social responsibility programme undertaken by the licensee;
- (ii) the licensee and any of the licensee's business partners must not derive, or intend to derive, any direct financial benefit from the advertisement of the programme;
- (iii) the licensee must not use the advertisement of the programme to solicit for new patients.

9.1. Corporate social responsibility (CSR) initiatives or programmes include raising funds for, and providing healthcare services at a lower or no cost, to needy patients.

9.2. When advertising CSR initiatives or programmes, licensees must specify that the advertisement is in relation to its CSR programme and must ensure that the information in the advertisement is factually accurate, does not contain promotional elements and complies with regulation 4 of the Advertisement Regulations (see paragraphs 5.2 to 5.8).



9.3. In any public acknowledgement of a licensee's contribution to any good cause(s), the licensee must ensure that the public acknowledgment does not state any information pertaining to the HCI, other than the name of the HCI.

10. Advertising in conjunction with any person

Regulation 6:

The licensee of a healthcare institution must ensure that the advertisement of the services of the healthcare institution in conjunction with the advertisement of any activity, event or programme of any person complies with regulation 4.

10.1. When advertising in conjunction with any activity, event or programme of any person (e.g. advertising preferential rates or service packages for members of clubs, societies or companies), licensees must ensure that the advertisements adhere to and comply with regulation 4 of the Advertisement Regulations (see paragraphs 5.2 to 5.8). For example, when advertising a preferential rate for the members of clubs, societies or companies, the advertisement should only contain nett pricing, without comparing this price to the price offered to non-members.

10.2. Although licensees may also engage the professional services of an advertising company or a third party to publicise information on the HCI's services, it is the responsibility of the licensee to ensure that all their advertisements comply with the provisions of the Advertisement Regulations.

11. Advertisements outside Singapore

Regulation 15:

The licensee of a healthcare institution may advertise the services of the healthcare institution in any country outside Singapore, and, where the licensee does so, regulations 4 to 14 do not apply.

Regulation 16(1):

For the purposes of these Regulations, an advertisement is deemed to be published in the country in which it is reasonably expected to be received or accessible in the normal course of events.

Regulation 16(2):

An advertisement is not regarded as being published in a country if its receipt in such country is incidental.

Regulation 16(3):

To avoid doubt, where an advertisement is published through a mass medium, whether electronic or otherwise, accessible in the normal course of events to the general public in Singapore as well as in other countries, including but not limited to advertisement published through the Internet, regulations 4 to 14 apply to such advertisement and publication.

11.1. Licensees may advertise or promote their respective HCIs' services outside Singapore. Regulations 4 to 14 of the Advertisement Regulations will not apply if the HCI is able to prove that its advertisement is meant only for an overseas audience and is not accessible to the general public in Singapore, in the normal course of events. However, if the advertisement is published through a mass medium and can be accessible to the general public in Singapore in the normal course of events, such as via the internet or social media, then regulations 4 to 14 of the Advertisement Regulations will apply to the said advertisement.

11.2. To avoid doubt, when advertising overseas, licensees should comply with all applicable laws and regulations (including those of the country of publication) in relation to the advertisements.

12. Summary of Licensees' Responsibility

12.1. It is the licensee's responsibility to ensure that the style and content of the HCI's advertisement, and the manner in which the HCI's advertisement is published, complies with all relevant provisions of the Advertisement Regulations.

12.2. In the event that a licensee is investigated by MOH for a possible offence under the Advertisement Regulations, the licensee will be issued with a letter requiring an explanation during the course of investigations, which the licensee must respond to within 5 working days of the receipt of the letter.

12.3 Where the licensee is made aware of an advertisement that contravenes the Advertisement Regulations, the licensee must take all reasonable steps to rectify or withdraw the contravening advertisement. The Director of Medical Services may, after making due inquiry into the matter, also order the licensee to alter, withdraw, remove or discontinue the advertisement or cause the same to be altered⁴, withdrawn, removed or discontinued. Failure to do so, especially within a timeframe stipulated by MOH, may result in additional enforcement actions.

13. Decision Tree to determine if an Advertisement is in Compliance

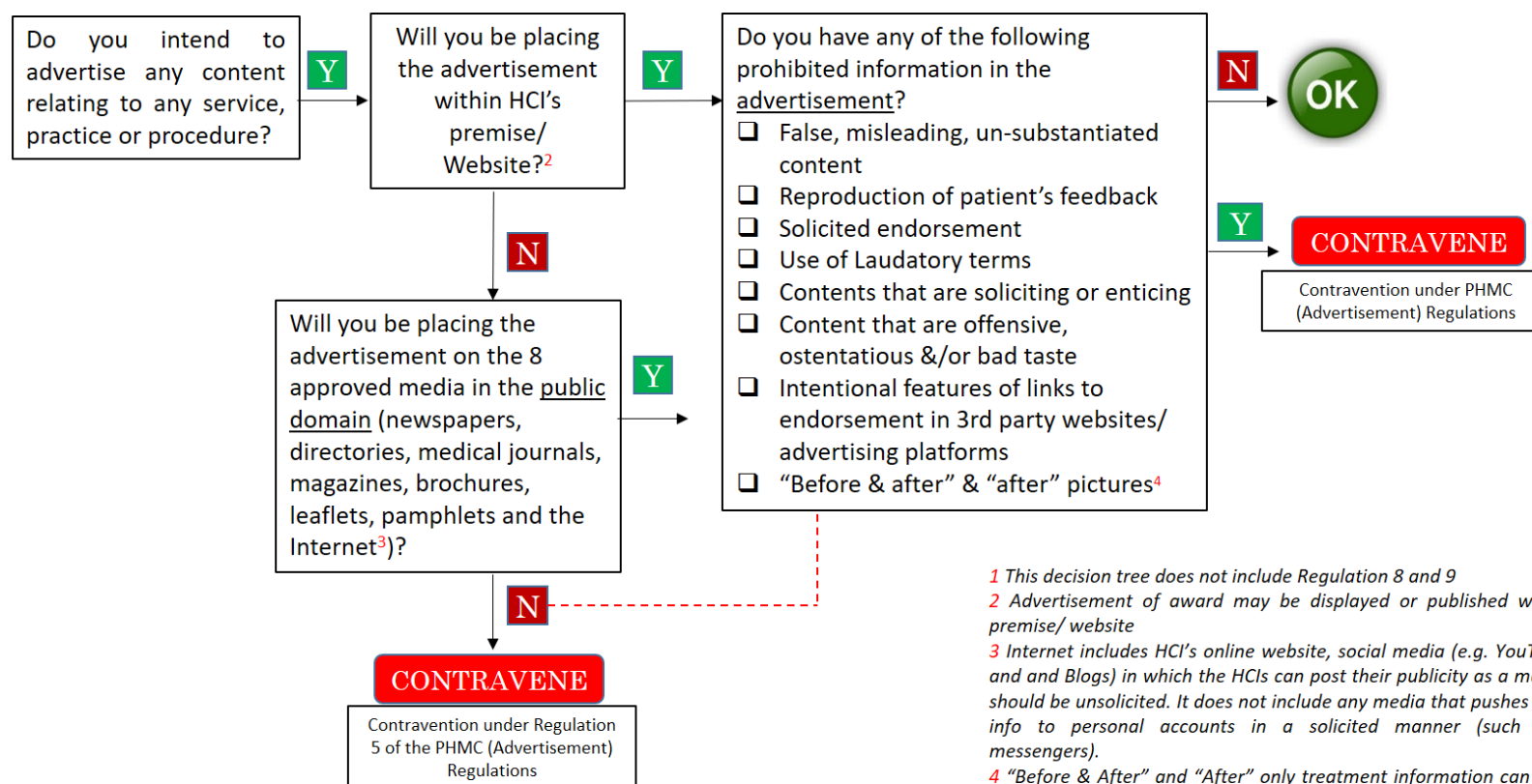
13.1. A decision tree (see diagram 1) has been developed to assist licensees of HCIs to determine if their advertisement is in compliance or contravention of the Advertisement Regulations. Licensees are encouraged to use this decision tree in their assessment, and familiarise themselves with the Advertising Regulations and this EG, before advertising the healthcare services provided by their respective HCIs.

⁴ "Alter" in this context includes amending the offending advertisement so as to enable the public to see the corrected advertisement.



Diagram 1: Decision tree in Determining if the Advertisement is in Compliance with the Advertisement Regulations

Decision Tree to Determine if An Advertisement¹ Contravenes the Regulations



¹ This decision tree does not include Regulation 8 and 9

² Advertisement of award may be displayed or published within the HCl's premise/ website

³ Internet includes HCl's online website, social media (e.g. YouTube, Facebook and Blogs) in which the HCl's can post their publicity as a mass update and should be unsolicited. It does not include any media that pushes the advertising info to personal accounts in a solicited manner (such as whatsapp, messengers).

⁴ "Before & After" and "After" only treatment information can only be shown during one-to-one consultation.

14. Contact Us

14.1. For enquiries, and to provide us with feedback on advertisements that may potentially contravene the Advertisement Regulations, please email elis@moh.gov.sg.

14.2. To facilitate our review and follow-up, please provide the following information with your feedback:

- (a) a copy of the relevant advertisement;
- (b) details of where and when the advertisement was published or seen and which HCI it relates to; and
- (c) details of the concerns identified with the advertisement. If possible, the identified non-compliance, including the clause/provision/prescribed requirements referred to, should be provided.