



**CLINIC
COMPLIANCE**

Website AHPRA & TGA Compliance Report

yourclinic.com.au

dd/mm/yyyy

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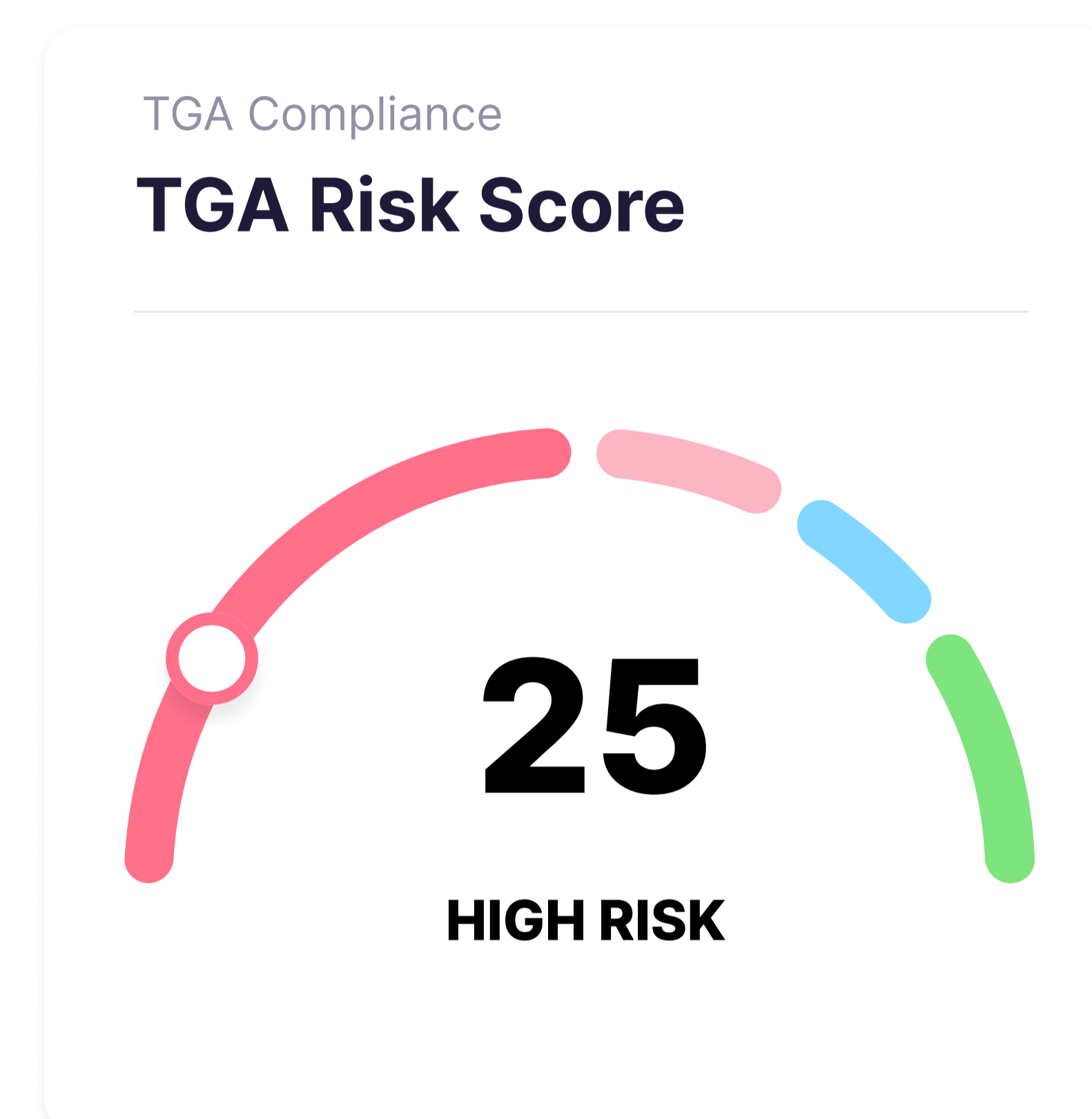
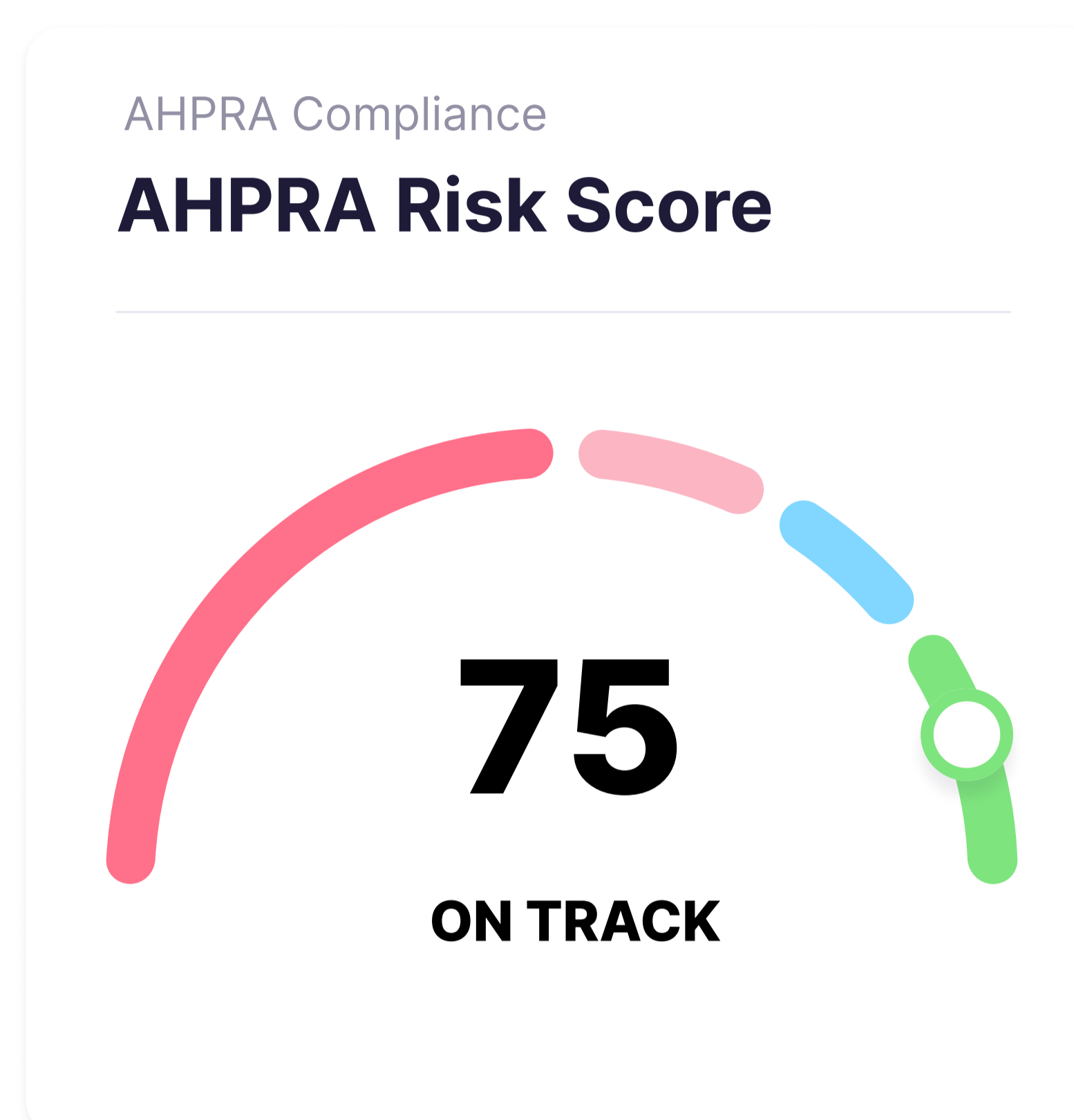
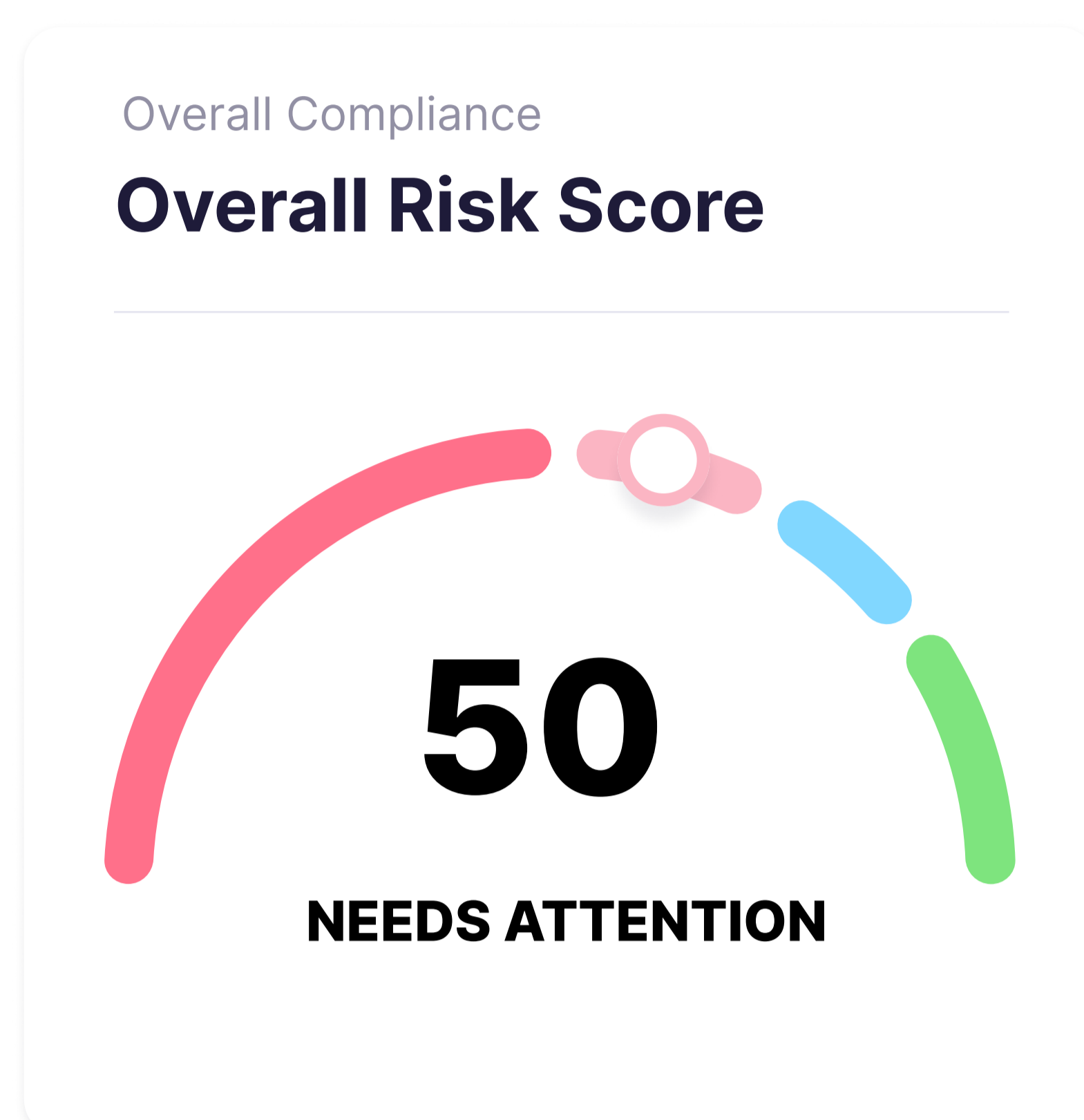
This report provides general guidance based on an automated scan of public pages and limited manual review. It is not legal advice. Regulatory positions may change and outcomes depend on context. Consider seeking independent legal advice. Clinic Compliance is not affiliated with the Australian Health Practitioner Regulation Agency (AHPRA) or the Therapeutic Goods Administration (TGA). References to AHPRA/TGA materials are for information only.

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1. Executive Summary

This report summarises potential AHPRA and TGA advertising risks detected on the public pages you instructed us to scan. It groups issues by category, explains why they matter, and provides recommended fixes. Some items may require professional judgement and manual review.



Top 3 risk areas

- Testimonials or patient stories on service pages (AHPRA).
- Prescription-only (S4/S8) brand mentions without meeting the price-list exception (TGA).
- Inducements (e.g., “free consult”) without required terms/expiry (AHPRA).

Quick wins (recommended this week):

- Remove clinical testimonials from regulated service pages, or move to a compliant format if applicable.
- Delete direct references to POM brand names from marketing pages; keep any allowed references in factual price-list context only.
- Add terms and clear expiry to any inducement offers; ensure prominent display near the offer.

2. Scoring Methodology

Scope

Scan window:

30 August 2025, 9:53AM, AEST

Pages analysed:

35 across yourclinic.com.au.

Crawl depth:

Up to 35 internal links from start URLs; querystring variants ignored unless whitelisted.

Patterns checked:




AHPRA — testimonials; inducements/expiry; titles/qualifications; claims & evidence; before/after imagery; unrealistic expectations; unnecessary use. TGA — POM mentions; price-list conditions (Part 9); general Code requirements (Parts 2–3); testimonials/endorsements (Part 6); “TGA approved”/logo misuse; restricted/prohibited representations (screen for triggers).

Risk Score





Each finding is scored on Severity (S), Impact (I), and Confidence (C).

A risk score R is computed as $R = (S \times I) - (1 - C)$.

Severity Levels

	Minor	1
	Moderate	2
	Major	3
	No Issue	





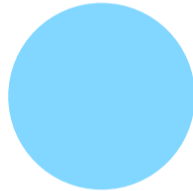

Impact Levels

	Low	1
	Medium	2
	High	3
	No Issue	

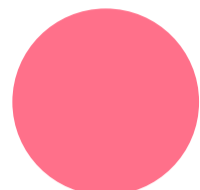
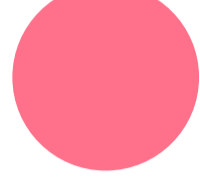
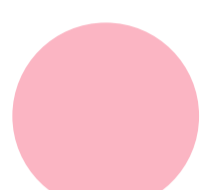

Confidence Levels

	Low	0.6
	Medium	0.8
	High	1.0
	No Issue	

3. Findings Summary By Category


Category	Regulator	Severity	Count	Pages affected
Testimonials / Reviews	AHPRA		5	https://yourclinic.com.au/services/lip-fillers https://yourclinic.com.au/services/skin
POM Mentions (S4/S8)	TGA		4	https://yourclinic.com.au/services/anti-wrinkle https://yourclinic.com.au/blog/article https://yourclinic.com.au/services/skin https://yourclinic.com.au/blog/article-2
Inducements	AHPRA		2	https://yourclinic.com.au/services/lip-fillers https://yourclinic.com.au/services/skin
Claims & Wording	AHPRA & TGA		2	https://yourclinic.com.au/services/lip-fillers https://yourclinic.com.au/services/skin
Titles & Qualifications	TGA		1	https://yourclinic.com.au/
ARTG Alignment	TGA		1	https://yourclinic.com.au/

4. Action Plan

ID	Category	Issue	Priority	Notes
A1	Testimonials / Reviews	Testimonials on treatment page.		Remove or relocate; see wording ex.
A2	POM Mentions	Brand name on services page		Remove brand; price-list rules only.
A3	Inducements	"Free consult" banner w/o T&Cs		Add terms near offer; add expiry.
A4	Claims	"Clinically proven" phrasing		Replace with factual description.

5. Detailed Findings

Finding A1: Testimonials on regulated service page

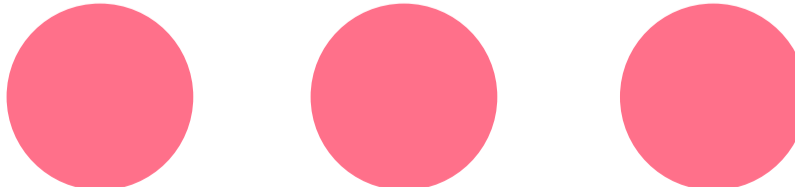
Regulator	AHPRA
Page URL	https://yourclinic.com.au/services/lip-fillers
Element	Section: #reviews-carousel
Snippet (detected)	"Best injectables I've ever had...the results are amazing."
Clause reference (summary)	Advertising regulated health services — testimonials restrictions.
Severity / Impact / Confidence	

Recommendation

Example wording:

Replace outcome-focused quotes with factual service info (e.g., treatment overview, risks, downtime) and provide links to independent review platforms without curating outcome claims.

Finding A2: Prescription-only medicine (POM) brand mention

Regulator	TGA
Page URL	https://yourclinic.com.au/services/anti-wrinkle
Element	Paragraph in hero copy
Snippet (detected)	"We use [BrandName™] anti-wrinkle injections for best results."
Clause reference (summary)	Prohibition on advertising prescription-only medicines (S4/S8), limited price-list exception conditions.
Severity / Impact / Confidence	

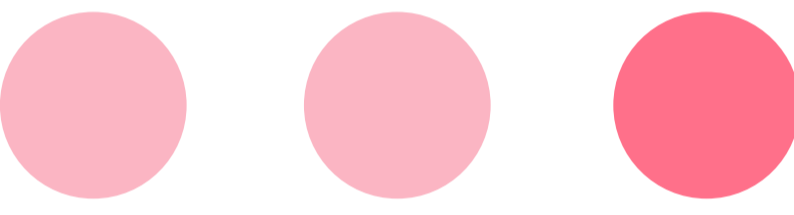
Recommendation

Remove direct references to the brand name and any promotional claims. If you choose to provide a compliant price-list, ensure it is factual, includes required elements, and is not promoted as an inducement.

Example wording:

Suggested: "Anti-wrinkle injection price list: [units/price format if applicable]." Avoid brand names and promotional language.

Finding A3: Inducement without terms/expiry

Regulator	AHPRA
Page URL	https://yourclinic.com.au/
Element	Promo banner
Snippet (detected)	"Free consultation this month!" (no terms shown)
Clause reference (summary)	Inducements must include clear terms and conditions including any limitations and an expiry date.
Severity / Impact / Confidence	

Recommendation

If you keep the offer, add a clear, proximate terms link or inline text with eligibility, limitations, and a specific end date. Ensure the terms are visible where the offer appears.

Example wording:

Example: "Free initial consultation for new patients only. Ends 30 June 2025. Conditions apply."

6. Category Checklists

A. Testimonials & Reviews (AHPRA)

- No testimonials about clinical outcomes on regulated service/treatment pages.
- No curated star ratings implying outcomes for regulated services.
- Patient experience comments (if any) are general and non-clinical.

B. POM Mentions / Price-List Exception (TGA)

- No brand mentions for prescription-only medicines on marketing pages.
- If a price-list is provided, it is factual, not promoted, and meets the exception conditions.
- No inducements connected to prescription-only medicines.

C. Claims & Wording

- Avoid “clinically proven”, “guaranteed results” unless you can substantiate and the context is appropriate.
- Prefer factual descriptions of services, risks, downtime, and expected variability.
- Avoid implying endorsement by regulators (e.g., “TGA approved”) in marketing copy.

7. Verification & Rescan

- Once changes are live, run a rescan of key pages to confirm issues are resolved.
- Capture before/after screenshots and store in your change log.
- Schedule monthly scans and on-publish checks for new/updated pages.

Appendix

A. Glossary (selected)

- POM: Prescription-Only Medicine (Schedule 4 or 8).
- Price-list exception: Limited conditions under which factual pricing may be displayed without promotional claims.
- Regulated health service advertising: Communications that influence decisions about obtaining a regulated health service.

B. Sources (overview)

- AHPRA — Advertising guidelines for regulated health services (current version).
- TGA — Therapeutic goods advertising requirements, including prescription-only medicine restrictions.
- Any clinic-specific policies or approvals you provide.

C. AHPRA Clauses to cite

Testimonials on service page

Clause(s): AHPRA Guidelines §4.3; §4.3.1–4.3.2; National Law s.133(1)(c).

Why it matters: Using testimonials (patient stories, star-ratings implying outcomes) to advertise a regulated health service is prohibited.

Inducement without terms/expiry

Clause(s): AHPRA Guidelines §4.2; National Law s.133(1)(b).

Why it matters: Any gift/discount/offer must include clear, proximate terms & conditions (eligibility, limitations, expiry) and they must be easy to find.

“Clinically proven / guaranteed” claims

Clause(s): AHPRA Guidelines §4.1; §4.1.1–4.1.2.

Why it matters: Claims must be accurate and supported by acceptable evidence; avoid exaggerated or incomplete efficacy statements.

Titles & Qualifications (“Doctor”, “specialist”)

Clause(s): AHPRA Guidelines §4.1.4 (a–g).

Why it matters: Do not imply specialist registration/endorsement unless held; if using “Dr” for non-medical practitioners, state the registered profession (e.g., “Dr Smith (Dentist)”).

Before/After images

Clause(s): AHPRA Guidelines §4.4; §4.4.1.

Why it matters: Avoid creating an unreasonable expectation of benefit; images must be comparable and non-misleading.

D. TGA Clauses to cite

POM brand mentions on marketing pages

Clause(s): Therapeutic Goods Act s.42DL / s.42DLB (see TGA guidance); TGA “What cannot be advertised to the public”.

Why it matters: Prescription-only medicines cannot be advertised to the public; avoid direct or indirect promotion (including brand names) outside the price-list exception.

Price list exception (if clinic wants to show prices)

Clause(s): Advertising Code 2021 — Part 9.

Why it matters: Factual price lists for POM/S3 are permitted only under strict conditions (no promotional claims, specific content rules).

“TGA approved / TGA registered” wording

Clause(s): TGA guidance on “‘TGA approved’ must not be used”; Advertising considerations.

Why it matters: Don’t imply TGA endorsement or use TGA logos; instead, you may state the ARTG number factually.

Testimonials/endorsements about therapeutic goods

Clause(s): Advertising Code 2021 — Part 6.

Why it matters: Strict controls on testimonials/endorsements in therapeutic goods advertising (especially on social media).



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