

GENERAL PRACTITIONER v GENUS

Promotion of Cetraben

A general practitioner alleged that an advertisement for Cetraben, issued by Genus, was offensive and degrading due to its sexual and titillating picture. Cetraben was an emollient used particularly for symptomatic relief in eczema.

The advertisement featured the back view of a young woman walking down a city street. The wind appeared to have lifted her short turquoise skirt to reveal red and white polka dot underwear. The photograph showed her looking over her left shoulder and gasping. The headline read: 'Confidence to live life their way*' followed beneath by '*However that might be'. The complainant stated that he despaired of the industry's standards and culture that such an advertisement should be considered appropriate.

The detailed response from Genus is given below.

The Panel noted the Code required materials and activities to recognise the special nature of medicines and the professional standing of the audience and not be likely to cause offence. Supplementary information stated that the display of naked or partially naked people for the purpose of attracting attention and the use of sexual imagery for that purpose was unacceptable.

The Panel recognised that eczema might affect a patient's self esteem and confidence and noted Genus' submission that the advertising campaign was developed specifically to acknowledge the potential negative effects of eczema on people's lives and demonstrate the positive impact successful treatment could have by restoring self confidence.

Turning to the advertisement in question, the Panel considered that 'confidence' could have been portrayed in other ways. The Panel considered that the suggestive manner in which the young woman's underwear was exposed was for the purpose of attracting attention to the advertisement, rather than to show the impact of the treatment on a patient's confidence. The Panel considered that the material did not recognise the special nature of medicines and the professional standing of the audience to which it was directed and was likely to cause offence. A breach of the Code was ruled.

A general practitioner complained about an advertisement for Cetraben (white soft paraffin, light liquid paraffin) (ref CET04121348B) issued by Genus Pharmaceuticals published in GP, 25 April 2012. Cetraben was an emollient used particularly for symptomatic relief in eczema. The advertisement featured the back view of a young woman walking down a city street. The wind appeared to have lifted her short turquoise skirt to reveal red and white

polka dot underwear. The photograph showed her looking over her left shoulder and gasping. The headline read: 'Confidence to live life their way*' followed beneath by '*However that might be'.

COMPLAINT

The complainant alleged that the advertisement was offensive and degrading due to its sexual and titillating picture. The complainant stated that he despaired of the industry's standards and culture that such an advertisement should be considered appropriate.

When writing to Genus, the Authority asked it to consider the requirements of Clause 9.2 of the Code.

RESPONSE

Genus submitted that the Cetraben campaign had been developed to reflect a number of important treatment needs for patients with eczema. There were currently over 6 million patients in the UK who suffered from dry skin or eczema and the incidence of eczema had increased by 42% between 2001 and 2005. The effects of eczema were manifold and if not treated effectively could result in a number of distressing sequelae including depression, anxiety, major sleep disturbance, bullying and difficulty socialising.

Genus submitted that the effect of eczema on individuals' self-esteem and self-confidence was a major consideration. Thirty six percent of people with eczema reported that the condition could affect their self-confidence and 43% were concerned about being seen in public while suffering an exacerbation of eczema.

Genus stated that the Cetraben campaign was developed specifically to acknowledge these potential negative effects of eczema on people's lives and demonstrate the positive impact that successful treatment could have in allowing patients to continue with normal activity and removing the detrimental effect on self-confidence – hence the headline 'Confidence to live life their way'.

Genus explained that eczema affected people of all ages. The Cetraben campaign recognised three major demographics: young children, women and the elderly. Eleven percent of eczema patients were under 12 years, 47% were between 13 and 55 and 42% were over 56. The advertising campaign comprised three separate creative treatments each of which addressed one of these age demographics (copies of the advertisements were provided). Equal emphasis had been placed on each of these age groups within the campaign.

Genus noted that the complainant had cited only one of the age groups – the younger female. Genus explained that young women with eczema were a group of patients whose requirement for effective treatment had increased significantly over the past few years and who had particular requirements from their treatment. Eczema was more common in women than in men except in those under 5 and over 80. This difference in prevalence between the sexes was seen mostly in the ages of 20 to 40 when the prevalence in females was over twice that in males. GP consultations for eczema were proportionately much higher for women between 20 and 40 than for men – a difference that only evened out when patients reached their 70s and 80s when the consultation rates for men and women were comparable. The Cetraben advertising campaign reflected this situation.

Genus noted that the complaint was about the advertisement which featured a young woman and so it assumed that the complainant had not seen or chose not to complain about the three older female patients who were shown in bathing suits, although it acknowledged that the complainant might not yet have seen the other advertisements.

Genus submitted that the advertisement at issue was developed in response to the growing number of young women with eczema who presented to GPs nationwide. A key issue for these patients was being seen in public when they were suffering an eczema exacerbation; 46% of females with eczema were concerned about being seen in public. It was this effect on patients' quality of life that was addressed in the Cetraben campaign. Indeed it was most often the everyday activities depicted that patients avoided; 86% of patients avoided at least one type of everyday activity while in flare - these include bathing, wearing shorts, skirts or T-shirts and swimming.

Genus stated that, in summary, as Cetraben was indicated for the treatment of dry skin and eczema it was inevitable that promotional imagery should depict naked skin and that this was consistent with advertising for other dermatological conditions. Genus noted that other medicines had promoted dermatological brands with a significantly higher degree of nakedness than was used in the Cetraben advertisement now at issue all of which featured people in everyday clothing none of which could be described as skimpy.

Genus noted that similar issues regarding dermatological products were addressed by the PMCPA on a number of occasions, most recently in Case AUTH/2304/3/10 in which the promotion of Exorex lotion featured a woman in her underwear walking through a supermarket. Breaches of Clauses 9.2 and 9.1 were considered but the Panel considered the imagery relevant to the therapeutic area.

The Cetraben campaign was a light-hearted route to engage health professionals in what was a serious matter for eczema patients and it showed the

positive impact on self-esteem and self-confidence brought about by successful treatment.

Genus submitted that the woman photographed was only embarrassed that her skirt had blown up in the wind – to demonstrate that because of successful treatment of her eczema she now had the confidence to wear a skirt and not cover her legs.

Genus considered that the Cetraben campaign was an appropriate way to depict the positive benefits of effective treatment. There was both a strong medical and a marketing rationale to present patients in the way it had. The advertisements depicted patients that would be readily recognised by health professionals who routinely treated eczema patients of these types. Genus considered that the advertisements successfully promoted Cetraben and the need for effective treatment of a condition that could otherwise have a serious and negative effect on patients' quality of life.

Genus stated that it took Clause 9 into account when it drew up the advertisement and it was mindful of the clause criteria and judged the advertisement in light of similar promotional pieces seen throughout the health professional environment. In Genus's view the advertisement conveyed the message intended in a non-sexual manner.

Genus noted that subjectivity of an audience was difficult to measure and it believed strongly it was aligned with the type of images commonly used within the industry for dermatology products and was not in breach of Clause 9.2.

PANEL RULING

The Panel noted the requirement of Clause 9.2 that materials and activities must recognise the special nature of medicines and the professional standing of the audience and must not be likely to cause offence. The supplementary information to Clause 9.1 and 9.2 stated that the display of naked or partially naked people for the purpose of attracting attention and the use of sexual imagery for that purpose was unacceptable.

The Panel noted Genus' submission that the advertisement in question was one of three which featured three major eczema demographics; younger children, female adults and the elderly.

The Panel recognised that eczema might affect a patient's self esteem and confidence and noted Genus' submission that the advertising campaign was developed specifically to acknowledge the potential negative effects of eczema on people's lives and demonstrate the positive impact successful treatment could have by restoring self confidence.

The Panel noted Genus' submission that promotional imagery for a treatment for dry skin and eczema would inevitably depict naked skin. The Panel considered that whilst depiction of naked skin was not necessarily unacceptable it must comply with the Code, in particular the supplementary

information to Clauses 9.1 and 9.2, Suitability and Taste, which stated, *et al*, that the display of naked flesh for the purpose of attracting attention to the material or the use of sexual imagery for that purpose were unacceptable styles of promotion.

Turning to the advertisement in question, the Panel considered that 'confidence' could have been portrayed in other ways for example by showing the young woman's legs without exposing her underwear. The Panel considered that the suggestive manner in which her underwear was exposed was for the purpose of attracting attention to the advertisement, rather than to show the impact of the

treatment on a patient's confidence. The Panel noted the supplementary information to Clause 9.1 and 9.2, Suitability and Taste, as set out above and considered that, consequently, the material thus did not recognise the special nature of medicines and the professional standing of the audience to which it was directed and was likely to cause offence. A breach of Clause 9.2 was ruled.

Complaint received	3 May 2012
Case completed	2 July 2012
