



**JCCP ANNUAL REPORT
2021 – 2022**

Charity Commission Number 1177540

TRUSTEES – April 2021 – March 2022

Voting Members

Professor David Sines CBE – Chairperson and Registrar
Dr. Martyn King – Medicine – Vice Chair
Tracey Bell – Dentistry
Kirsty Benn-Harris – Chair of the Policy, Resources and IT Committee
Eddie Hooker – Corporate Governance
Lorna Kidd – Patient/User – **Resigned in May 2021**
Dawn Knight – Patient/User
Caroline Larissey – Beauty Therapy Sector
Professor John Underwood – Chair Communications and Marketing Committee
Professor Mary Lovegrove OBE – Chair of the Education and Training Committee
Andrew Rankin – Nursing and Chair of the Practitioner Register Committee and Co-Chair Clinical Advisory Group
Sally Taber – Corporate Governance
Mr. Alex Woollard – Plastic Surgeon and CPSA Representative/Mr. Mark Mikhail Plastic Surgeon and CPSA Representative
Dr Paul Charlson – Medicine – Co-Chair Clinical Advisory Group
Sharron Brown – Nursing – (BACN nominated Trustee)
Dr John Elder – Medicine (BCAM nominated Trustee)

Non-Voting Members

Victor Ktorakis – Environmental Health Sector Representative
Wendy Rogers – Manufacturing Industry Representative
Alicia Greenwood - Manufacturing Industry Representative
Joan Scott – Skills Active/Habia
Stacey Brazier/Mike Smith – Manufacturing Industry Representative
Gillian Kennedy - Manufacturing Industry Representative

Executive Support

Paul Burgess MBE

Trustee Appointment Process

All voting members of the JCCP Trust Board are appointed in accordance with Charity Commission rules and procedures in strict accordance with Nolan Principles. All voting members of the Trustee Board are also registered with Companies House. All appointments are approved by the full Trustee Board in open session.

Non-Voting members are selected and appointed in accordance with 'skill mix/expertise' requirements determined by the full Trustee Board in order to enable the Board to achieve its core purpose, functions and objectives.

Mission Statement, Values and Public Protection

Mission Statement of the JCCP

The Mission Statement for the JCCP and its values are set out below:

‘The Joint Council for Cosmetic Practitioners (JCCP) and the Cosmetic Practice Standards Authority (CPSA) are the recognised self-regulators of the non-surgical aesthetic and hair restoration surgical industries in England and the point of access for the public seeking information about this area of practice and where appropriate for raising concerns about practitioners. The JCCP places public protection and patient safety at the core of its activities.

JCCP Practitioner Registrants and associated Qualifications and Education and Training Providers will be approved by the JCCP as meeting the highest standards of quality by ensuring that all parties who have been admitted to the JCCP’s Register(s) have met agreed benchmarks and abide by the standards of practice and behaviour as determined by the Cosmetic Industry CPSA and the JCCP.

Values of the JCCP

- Upholding Patient Safety and Public Confidence as the core driving force of the JCCP.
- Operating its Register of Practitioners and Approved Education and Training Providers within a strict and agreed Code of Practice that embodies robust ethical standards to providing aesthetic treatments.
- Openness, fairness, and independence.
- Commitment to Equality of Opportunity, Inclusion and Diversity
- Working in partnership with patients and all key stakeholders in the aesthetic industry.
- Recognising innovation and best evidenced-based practice and responding to change.

Protecting the Public

- Applying strict standards for entry to the JCCP Register and for continued registration.
- Approving qualifications and education and training providers that deliver qualifications that meet the standards.
- Maintaining a register of individuals who successfully complete those programmes and approval procedures.
- Taking action if the standards may not have been met.
- Establishing clear and simple procedures to enable the public to raise issues of concern about the professional practice of registrants or other key issues of concern related to aesthetic education, training and standards of aesthetic practice.
- Providing simple and easily accessible information to the public considering non-surgical aesthetic treatments.

JCCP Strategic Objectives – 2021 -2022

Strategic Objective 1

To sustain a self-regulatory body to oversee the non-surgical aesthetic sector and the hair restoration surgical sector in England with a clear and supported framework of governance.

Key Enablers

- Dissemination and application of education, clinical and practice-based standards for non-surgical aesthetic and hair restoration surgical treatments.
- Implementation of an agreed set of premises standards for practitioners and education/training providers.
- Implementation and governance of a constitutional structure that befits a self-regulatory body with charitable status.
- Scrutiny and assurance following the implementation of the JCCP published governance framework.
- Dissemination and application of an agreed ‘Code of Practice’ (2020) for Registrants (in partnership with the CPSA).
- Publication and implementation of clear and transparent procedures and processes for dealing with ‘complaints’ or ‘fitness to practice’ issues.
- Ongoing agreement and alignment of frameworks and best practice for working with ‘Professional Statutory Regulatory Councils’ regulating practitioners in the fields of non-surgical aesthetics and hair restoration surgery.
- Implementation of the agreed Executive and administrative structure for the JCCP.
- Ensuring and monitoring continuous risk management.
- Continue to implement and update CPSA standards framework and where necessary reflect any updates and additions of ‘emergent therapies’ in JCCP processes, procedures and competency frameworks.
- Review JCCP Competency Framework in line with any changes in standards agreed by the JCCP/CPSA.
- Carry out Annual Governance review in line with requirements from the PSA, Companies House, and the Charity Commission.
- Maintain and update the JCCP Register of Trustees and appointments to other JCCP committees.
- Maintain a central register of JCCP appointees ‘Declarations of Interest’.

Strategic Objective 2

To deliver the JCCP as an organization and brand that is recognised by the public and by practitioners as the benchmark for patient safety in non-surgical aesthetic and hair restoration surgery treatments and services.

Key Enablers

- Establishing and disseminating the JCCP brand that is clearly recognisable.
- Setting out the key purpose of the JCCP as a guardian of patient safety and public protection and establishing it as company limited by guarantee with charitable status.
- Publishing and reinforcing the key practitioner entry requirements to the JCCP Practitioner Register to ensure public confidence.
- Implementing a ‘Marketing and Communications Strategy’ and accessible ‘public-facing’ website to raise public awareness of the JCCP.
- Appoint a cadre of expert Key Opinion Leaders to support and advocate on behalf of the JCCP and its mission.
- Providing an accessible JCCP Practitioner Register and associated tools to enable the public to identify practitioners who meet the required standard.
- Publication and active promotion of the benefits of meeting practitioner entry requirements and registration on the JCCP register.
- Continue to work with UK Government Departments, the CQC, the MHRA, CIEH and PSRBs and with the ASA to promote the co-design, development, and implementation of a robust and responsive system of statutory governance and quality control in the Aesthetics Sector.

Strategic Objective 3

To monitor the effective establishment and implementation of the JCCP Practitioner Register (s) as required by the PSA as an approved public register (s) for practitioners in the non-surgical aesthetic and hair restoration surgery sectors.

Key Enablers

- Implementing, managing and systematic audit of the Practitioner Register (s) to meet PSA standards.
- Achievement of annual PSA accreditation.
- Providing robust JCCP technology platforms for its registers.
- Undertaking regular market testing with key stakeholders regarding the JCCP's operating platforms and procedures.

Strategic Objective 4

To approve non-surgical aesthetic and hair restoration surgery education and training provider organisations against an agreed, framework of education, clinical and practice standards for non-surgical aesthetics and hair restoration surgery treatments and procedures and to maintain a published register of the same.

To accredit non-surgical aesthetic and hair restoration surgery education and training provider organisations against an agreed, differentiated and defined framework of education, clinical and practice standards for non-surgical aesthetics and hair restoration surgery treatments and procedures.

Key Enablers

- Disseminate, publish and apply entry requirements and structures for education and training provider organisations to join the Council's Register of Approved Education and Training providers.
- Implement and monitor the JCCP's framework of educational, clinical and practice-based standards against which to register practitioners.
- Implement processes for evaluating and approving qualifications and education and training provider organisations that meet the JCCP standards.
- Implement and monitor the JCCP's framework of educational, clinical and practice-based standards against which to accredit practitioners.
- Implement processes for accrediting education and training provider organisations that meet the JCCP standards via approved centres.
- Explore and establish working arrangements with key education and training provider organisations and vocational Awarding Organisations approved to deliver JCCP approved qualifications.
- Monitor the implementation and 'roll out' of the JCCP's approved 'Fast-Track Accreditation and Assessment Centres' and continued alignment of Specialist Register (and professional College) competencies/standards against the JCCP Competency Framework.
- Align Professional Specialist Registry Competencies with the JCCP Competency Framework.
- Maintain effective working relationships with other key regulatory, accreditation and awarding bodies working in non-surgical aesthetics, including the Government's regulators for qualifications - Ofqual, and the SQA etc.

Strategic Objective 5

To implement and sustain a viable and sustainable financial model for the JCCP.

Key Enablers

- Continue to Identify key sources of income – Registrants, Education and Training providers, Corporate Supporters, Charitable Trusts, public sector organisations.
- Publishing and implementing a charitable funds/fundraising strategy
- Setting fees for practitioners and education and training provider organisations.
- Setting and monitoring a financially viable budget for the JCCP.
- Projecting cashflow.
- Continue to implement the 'Insurers Registration Project' programme.
- Continue to embed and extend the JCCP Corporate membership programme.

Strategic Objective 6

To ensure the robust implementation of the necessary technical infrastructure to operate an effective and resilient membership-based charity and regulatory body and register (s).

Key Enablers

- Specifying and procuring the technology requirements for the JCCP Register (s).
- Monitoring the effectiveness of the JCCP technology platforms.
- Continuously updating and refining the functionality and effectiveness for registration and supporting processes.
- Updating and refining the functionality and effectiveness of the JCCP website and social media functions to ensure 'reach' and utilisation.
- Achieving successful partnership agreement renewal with HFR (the JCCP's website and register host organisation) – Contract now renewed for a further three years until April, 2025.
- Continue to work in partnership with the CPSA and NEC Software Solutions (previously Northgate) to ensure patient data is collected and analysed to inform the future evidence base for the sector.

Strategic Objective 7

To ensure that the JCCP is a well informed and relevant body in the world of non-surgical aesthetics and hair restoration surgical practitioners.

Key Enablers

- Continuing to raise awareness of the role of the JCCP and the CPSA amongst key stakeholders.
- Hosting regular stakeholder engagement Council meetings to inform and to seek constructive engagement with the aesthetics sector.
- Engaging in regular discussion with key sector influencers and political opinion leaders and policy makers with the aim of improving patient care, public protection, and regulation.
- Facilitating ongoing dialogue with system regulators across the UK with the aim of co-designing and implementing pragmatic and effective systems of licensing and regulation for the industry to ensure patient safety and public protection.
- Providing and disseminating up to date information on all aspects of non-surgical aesthetics and hair restoration surgery for both stakeholders, registrants and the public.
- Reviewing and analysing the latest policy and research on the aesthetics sector.
- Providing feedback to the CPSA on issues and actions that may lead to an updating of the standards framework.
- Maintaining and updating the JCCP Competency Framework for aesthetic standards.
- Implementing a range of mechanisms and actions to keep registrants informed about the relevance of the JCCP and the CPSA and the latest issues relating to patient safety and public protection.
- Developing and implementing actions arising from the four 2021 JCCP Campaign Action Areas: Mental Health, Safe products, Advertising and Beauty.

Strategic Objective 8

To deliver and maintain the JCCP complaints system for both internal issues and regarding practitioners and other bodies.

Key Enablers

- Continue to implement and update the JCCP complaints policy in relation to the JCCP as an organization and submit amended documents to the PSA.
- Respond to complaints about JCCP registrants and approved education and training providers using the agreed JCCP processes.
- Provide feedback report on complaints about JCCP registrants to the PSA and where necessary appropriate regulatory bodies.
- Record all complaints received and determine if any of these need reporting to other regulators and or the ASA.

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INTRODUCTION

The Joint Council for Cosmetic Practitioners (JCCP) was established and launched formally at the House of Peers in February, 2018 following an extensive stakeholder consultation process undertaken by Health Education England (HEE) in accordance with the recommendations outlined in the Keogh Review (2013) on cosmetic treatments in England. The HEE standards were transferred to the JCCP by HEE in June, 2018. One of the key recommendations included in the 2015 HEE Report called for the establishment of statutory regulation for the sector and for the immediate creation of a voluntary register. The JCCP now fulfils such a function.

The JCCP is a ‘not for profit’ UK charitable body charged with the responsibility of voluntary ‘self-regulation’ of the non-surgical aesthetic and hair restoration surgical sectors in the four UK countries. The Mission Statement for the JCCP and its values are set out below:

‘The Joint Council for Cosmetic Practitioners (JCCP) is a Professional Standards Authority (PSA) accredited voluntary self-regulator of the non-surgical aesthetic and hair restoration surgery industries in England and provides an informed and legitimate point of access for the public seeking information about this area of practice and where appropriate for raising concerns about practitioners. The JCCP places public protection and patient safety as the focus of its activities’.

The Charity's objects refer to the promotion of the health and safety of, and protection of the public by the development and implementation of high standards of performance and practice among non-surgical cosmetic practitioners and hair restoration surgeons, including the definition, creation and maintenance of an effective structure to inform the standard of professional education and training amongst non-surgical cosmetic practitioners and hair restoration surgeons.

The JCCP provides two voluntary registers;

- Practitioner Register (Approved by the PSA)
- Approved Qualifications and Education & Training Provider Register (Approved by the JCCP and lists those education and training provider organisations and qualifications whose standards and qualification accord with the JCCP’s published education and training standards required for entry to its PSA Approved Practitioner Register).

JCCP Practitioner Registrants and Approved Qualifications, Education and Training Provider Organisations are recognised, approved, and registered by the JCCP in line with Professional Standards Authority (PSA) and JCCP/CPSA accredited standards. For practitioner registrants this requires evidence of the possession of relevant knowledge, experience or qualifications leading to core and modality specific competency as set out by the JCCP’s sister body the Cosmetic Practice Standards Authority in their practice standards (February, 2018) and by the JCCP’s Competency Framework (September, 2018), adherence to a published Code of Practice and Standards set out by the JCCP/CPSA (2020), good character, compliance with premises/infection control standards and possession of adequate insurance and indemnity cover in relation to treatments provided.

The JCCP has remained most active during the 2020/21/22 COVID-19 pandemic and engaged regularly with UK Government agencies, Professional Statutory Regulatory Bodies, Insurance Companies and Professional Organisations in order to determine and publish guidelines on how to work safely, ethically, professionally, and legally during this period in the context of ‘Covid-related’ restrictions. The JCCP has contributed to national and global webinars, published guidance on its website and responded to numerous individual and corporate enquiries during the ‘lockdown’ period. This work has dominated much of the JCCP’s activity and stakeholder engagement activities this year. A copy of the JCCP ‘Preparing your Place of Work’ Guidelines may be accessed via the following weblink:

[https://www.jccp.org.uk/ckfinder/userfiles/files/Preparing%20for%20return%20to%20practice%20June%2027%20update\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/Preparing%20for%20return%20to%20practice%20June%2027%20update(1).pdf)

A copy of the JCCP ‘‘Navigating the Challenges Raised Regarding Returning to Work Safely’ Guidelines may also be accessed via the following weblink:

<https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%20Statement%20COVID%2019%20%2020%2005%2020%20Final%20version.pdf>

DEVELOPMENTS

The JCCP has been functioning for four years at the time of producing this annual report. During the past twelve months the JCCP has continued to formally embed its governance structures and has appointed a fully representative Board of Trustees, all of whom are registered with the Charity Commission and Companies House. Conflicts of interest policies and confidentiality procedures continue to be implemented and enforced to guide the work of the Charity. No breaches of confidentiality or governance have been witnessed during this year's reporting period. A 'Declaration of Interests' register is kept centrally. Conflicts of interest have been overtly declared where relevant and have been reported to the Trustee Board through the exercise of the Charity's public duty and candour process. During the reporting year the JCCP has continued to publish the minutes of its Trustee Board on its public facing website to enable transparency and accessibility to members of the public. The JCCP also published its Annual Report (2020/21) and Accounts on its public facing website in July, 2021.

The JCCP *Practitioner Register Committee* (PRC) has continued to meet virtually at bi-monthly intervals throughout the reporting year under the Chairmanship of Andrew Rankin and has received ongoing legal advice from Bevan Brittan following the full implementation of the Council's Fitness to Practise Rules and procedures. The full 'suite of' policies and procedures governing the JCCP's FtP processes have been reviewed again this year and continue to be regarded as 'fit for purpose'. The JCCP's list of 'fitness to practise' panellists (who are appointed by an independent Appointments Committee on behalf of the Council) has been updated this year and the Panellists continue in their role. Additional Panellists have been appointed throughout the year to provide a fully representative group of lay and professional FtP panel members. All Panellists have been trained in the application of the Council's FtP processes. The JCCP Practitioner Register Committee also produced procedures relating to the annual audit/sampling of registrant's self-returns for premises standards, supervision and for CPPD. The second annual sample of Registrants was undertaken in November, 2021 in accordance with published procedure. The sampling process continues to provide an effective method to quality assure practitioner annual renewal of registration requirements. During 2021 specific changes were made to ensure that a new and robust system of periodic audit checks was implemented to ensure the accuracy of Registrant data that appears on the JCCP public facing Practitioner Register. Changes were also made to the definitions used to annotate the status of registrants to make them more intelligible to members of the public and an annual audit of Registrant supervision requirements was added to the Council's annual registrant sampling process. These changes were made in response to a request from the PSA to ensure that all data published on the JCCP practitioner register was accurate and audited on a regular basis.

Throughout the year the JCCP Practitioner Register Committee provided rigorous oversight for the implementation of the PSA approved Part 'A' – 'Category Two' registration category for health care professionals. Revised definitions for these categories have been published on the JCCP website. These changes were the outcome of a 'Share your Experience' exercise undertaken by the PSA in 2018. The JCCP made a further application to the PSA in November, 2021 to seek an extension to the timeline for this part of the JCCP Practitioner Register to remain open. Due to anticipated changes being made by the UK Government on the implementation of new education and training standards for the aesthetic sector the JCCP sought agreement from the PSA in November, 2021 to extend the period for which the 'Part A' – 'Category Two' may stay open for new applicants until the Government makes an explicit determination on its plans for the implementation of a new system of licensing for the aesthetics sector. The PSA conceded to this request subject to a formal review being undertaken as part of the PSA's 2022 annual review of the JCCP's accredited register functions.

The JCCP has also continued to restrict access to its Level 7 practitioner register for Injectable Toxins and Fillers to suitably trained qualified and regulated Health Care Professionals only. This decision was last reviewed by the JCCP Board of Trustees in July, 2020 when it was determined that such a restriction should continue to be enforced until August, 2022 when the decision will be next reviewed by the Trustee Board. This remains the accepted policy position by the Council. Despite this decision the Council has remained actively engaged with the beauty sector and has continued to work closely with Habia, Skills Active (the relevant Sector Skills Council), The British Beauty Council, The National Hair and Beauty Federation and with BABTAC with the aim of promoting excellence in practice and education for the beauty therapy sector for treatments, other than those relating to injectables or dermal fillers. The JCCP has also instigated a specific special interest group relating to 'Safety and Beauty' which is co-chaired by the JCCP Chairperson and Caroline Larissey, JCCP Trustee in collaboration with key sector leaders.

The JCCP *Education and Training Committee* has also met regularly (virtually) throughout the year under the Chairmanship of Professor Mary Lovegrove and has provided oversight and governance for the JCCP 'Competency Framework' and 'Standards for Education and Training' provider organizations, exercising its role as 'gatekeeper' of the JCCP and CPSA competency standards. The charging policy for the approval of Awarding

Organizations and education and training provider organisations has been published on the JCCP website. The Education and Training Committee has received applications from Ofqual regulated Awarding Organizations and provider training organisations this year who have applied to enter the JCCP Register of Approved Education and Training Providers/Approved Qualifications. The JCCP Register of Approved Education and Training Providers has provided oversight for the audit and approval processes relating to the same. MAP-IQ was one such organisation that was approved in 2021 by the JCCP to deliver an ‘RPEL route for the VTCT approved qualification ‘Level 7 Diploma in Clinical Aesthetic Injectable Treatments’. An RPL route for the VTCT approved qualification ‘Level 7 Diploma in Clinical Aesthetic Injectable Treatments’ was also approved by the JCCP for delivery by Cosmetic Courses and by the Harley Academy.

The Education and Training Committee also approved policy guidelines for the establishment and implementation of the proposed JCCP Approved Assessment Centres in support of the ‘Fast Track’ scheme for practitioner registration as agreed with the PSA. Learnia in association with the University of South Wales gained approval to led on the implementation of the JCCP Fast Track Centre programme which commenced in the Autumn of 2021 after a delay in opening due to Covid-19 challenges. Three JCCPs Registrants were recruited to ‘test drive’ the Fast Track assessment process during the Autumn of 2021 which provided significant assurance regarding the robustness of the academic and practice-related assessment components of the fast-track assessment method/model. The fast Track Assessment Centre is delivered in strict accordance JCCP Education and Training Committee policy guidelines and commitment to providing this alternative route to achieving full membership status to the JCCP Practitioner Register. The JCCP has also approved the rollout of the Fast Track Assessment process to be delivered as a partnership initiative with Cosmetic Courses and the Harley Academy.

The Education and Training Committee also approved the ‘mapping’ of the GMC Plastic Surgery and the Dermatology Specialist Register qualifications against the JCCP Competency Framework with the result that equivalence was formally approved between these two educational frameworks. In addition, the JCCP was privileged to engage with the British College of Aesthetic Medicine (BCAM) this year with the aim of sharing professional expertise. During the year the JCCP’s Education and Training Committee formally approved and endorsed the BCAM Knowledge/Theoretical component of the Membership Examination and confirmed its alignment/equivalence to the JCCP Competency Framework (2018).

Excellent working relationships have also been maintained and transacted with the British Association of Cosmetic Nurses this year with particular regard to the promotion of patient safety and public protection and prescribing practice standards.

Two of the JCCP Trustees act as ‘Technical Experts’ for UKAS, enabling the introduction of UKAS accredited ‘certification of persons’ at the lower levels of practice. The JCCP also continues to contribute to the revised National Occupational Standards in Beauty and Aesthetics and continues to provide a range of subject/professional experts to assist Skills Active and Habia in the alignment of these standards to the 2018 JCCP Competency Framework. Dialogue has also progressed during 2021 with the newly created College of General Dentistry with the aim of co-designing a postgraduate qualification in aesthetic dentistry.

Permanent staffing for the JCCP has not been realised during 2021/22 due to the need to identify a recurrent and sustainable revenue stream to enable the recruitment of a Chief Executive Officer. However robust executive and governance arrangements have been implemented by the JCCP Trustee Board through the establishment of a new Policy, Resources and IT Committee, chaired by an independent Trustee – Kirsty Benn-Harris. This challenge has also been mitigated by the Chair continuing to assume the role as non-remunerated ‘Executive Chair and Registrar’. Paul Burgess continues to provide the Council with executive support. Administrative support has been provided to an excellent standard by Isobel Martin. The Council’s financial management, accountancy and audit services are outsourced to independent accountancy companies. Social media and communications have also been outsourced whilst the management of the JCCP website has continued to be graciously provided and maintained ‘pro bono’ by HF Resolutions. In a similar way pro bono legal advice has been provided to the JCCP again this year by our legal advisors Bevan Brittan.

The JCCP ***Marketing and Communications Committee*** continues to function actively under the chairmanship of John Underwood, JCCP Trustee. The key focus of the Committee’s work has been to raise public awareness about the Council’s mission, values, register(s) and public protection, in support of the DHSC’s declared commitment to enhance public awareness about the risks associated with some of the more invasive procedure practised within the sector. A key focus of the Committee’s work has been to review activities undertaken by the Government’s All Party Parliamentary Group on Beauty, Aesthetics and Wellbeing and by associated Parliamentarians regarding debates relating to the potential implementation of a national system of licensing for the aesthetics sector.

The Committee's membership has been refreshed and has met regularly throughout the year and has appointed new Key Opinion Leaders to promote the work and image of the Council. The Committee has also commissioned a new public facing series of web pages and has been working with Olly Capron from 'CDM London' to co-produce an effective online platform for members of the public. This new online site will be launched by the early summer of 2022. The Marketing and Communications Committee has planned for an enhanced presence to promote the work of the JCCP during 2021/22. National engagement at industry trade shows has been compromised this year due to Covid, requiring the JCCP to be selective with regard to attendance at national face-to-face events. The JCCP has also relied purposefully on the use of social media to disseminate key messages to members of the public and to practitioners. Excellent relationships have been maintained and developed further with both the professional and aesthetic press/media sector, supported by the publication of regular articles and papers and conference presentations, including the provision of a monthly publication column with the Journal of Aesthetic Nursing.

The JCCP's *Policy, Resources and IT Committee* continues to meet bi-monthly under the chairmanship of an independent Trustee - Kirsty Benn-Harris. The Committee has focussed on financial management, policy and resources, business continuity, sustainability, and technology. In year the PRIT Committee undertook to review all JCCP policies and procedures and to undertake a systematic review of all memoranda of understanding in accordance with JCCP governance requirements. PRIT also reviews the JCCP's Corporate and Patient Safety risk registers on a regular basis. The registers are also reviewed as 'live and updated registers' at each Trustee Board Meeting. Additional risks have been added this year in respect of 'Covid', 'adjunctive therapies' and practitioner register data integrity. Relevant controls and mitigation are included in both risk registers.

The PRIT Committee also provided oversight for the JCCP's three-year renewal process for the provision of its register and website functions in November 2021.

The JCCP's *Corporate Membership Scheme* has also flourished this year with the aim of enhancing the JCCP's capability and capacity to raise charitable funds with the aim of enhancing public protection and patient-safety-related activities within the aesthetics sector. In excess of £80,000 has been raised this year through this fundraising scheme which has enabled the JCCP to further its activities with regard to the promotion of patient safety and public protection (including the construction of a new patient/consumer facing website).

The JCCP signed a memorandum of understanding with sk:n in December, 2021 which has heralded a new partnership with this national aesthetic clinic chain. Our shared aims have been set down as being 'to enhance patient safety and public protection within the aesthetics sector and to work together to bring stakeholders together to unite around key safety/policy themes'. Shared activities will include the initiation of major campaigns to develop models of robust evidence-based shared governance and co-production to improve public protection, patient safety and to promote best practice, informed by research development, evidence-based practice, and activity data collection/audit and to raise awareness of key patient safety issues regarding the sector with the public and, practitioners and education/training providers.

Another notable achievement that was realised in July, 2021 was the formation of a new partnership with the Aesthetic Complications Expert Group World (ACE). The partnership was established to enable the JCCP and ACE to work together to promote best practice and standards in the aesthetic industry in furtherance of a shared commitment to public protection and consumer safety/awareness. The partnership seeks also to raise and share issues of concern regarding activities of aesthetic practitioners, where client/patient safety/public protection has been considered to have been compromised and to encourage aesthetic practitioners to engage in reflection and continuous professional development in order to further develop and improve their practice.

Financially the JCCP once again remains recurrently 'solvent' and has been able to attract charitable support from a range of benefactors who have again this year offered their services (without charge) to enable the Council to maintain its operational functions. The JCCP Board Trustees are fully cited on these matters and share the responsibility of assuring the PSA of the diligent and prudent approach that the JCCP has taken with regard to managing and implementing its fiscal processes and assurance requirements. Charitable donations gratefully received by the JCCP during the 2020/21 financial year are attributable to:

Teoxane £7,500
Merz (UK) Ltd: £10,000
Church Pharmacy Ltd: £7,000
Transform: £5,0000
Harley Academy: £2,500.00
Allergan: £10,000
Galderma: £10,000
Clinisept: £2,000
Hamilton Fraser: £6,000
sk:n: £20,000

Two patient representatives are appointed to the JCCP Trustee Board as full voting Trustees, supported by six other lay Trustees and eight Practitioner/Sector Stakeholder Trustees/Members. One the JCCP's Patient Trustees completed her term of office on the 31st May, 2021 – Lorna Kidd.

The JCCP was hosted a virtual Stakeholder Council in November 2021, Chaired by Dr. Tamara Griffiths. The Stakeholder Council provides a conduit of engagement with the JCCP Trustees and with the Council and its sub-committees. The key themes for this stakeholder related to patient safety, public protection, emotional and psychological health and wellbeing, raising public awareness and messaging regarding safety in the aesthetics sector and an update on proposals for the implementation of a national system of licencing for the aesthetic sector in the UK.

During 2020 the JCCP and CPSA continued to promote, implement and disseminate its Code of Conduct. Registrants have been reminded of the importance of complying with the JCCP/CPSA Code of Conduct (May, 2020) at all times. The revised Code of Practice may be accessed via the following weblink: –

<https://www.iccp.org.uk/ckfinder/userfiles/files/Final%20JCCPCPSA%20Code%20of%20Practice%202020.pdf>

The JCCP also formally reviewed, approved, and published a new Data Protection/Privacy Statement on its website and published a new Policy Statement on Equality, Diversity, and Inclusivity (November, 2021) and a new Policy Statement on Safeguarding (November, 2021). The JCCP Complaints procedure was also reviewed and updated during 2021. The JCCP confirms that all other policies, procedures, and governance arrangements remain fit for purpose. All policies and procedures have been shared routinely with the PSA. The JCCP also confirms that it possesses appropriate insurance and employer liability cover and remains in 'good form' with both the Charity Commission and with Company's House. The JCCP has also continued to maintain an excellent working relationship with the CPSA, underpinned by a robust Memorandum of Understanding and reciprocal Board membership.

The JCCP website has continued to be updated throughout the reporting year and a number of connectivity, accuracy and formatting issues were resolved. The total investment made to the building, revision, and maintenance of the JCCP Practitioner Register during 2021-22 has been in excess of £30,000 and has been generously funded by HF Resolution Ltd.

The JCCP Board of Trustees confirms that there have been no legal or constitutional challenges to the work of the JCCP or to its published governance arrangements/procedures. Relationships with external bodies have been excellent, encouraging, supportive and most productive.

GROWTH of the PRACTITIONER REGISTER

Despite the challenges presented by the national Covid-19 pandemic 2021 witnessed unprecedented growth regarding the number of registrants that the JCCP has been able to recruit to its Practitioner Register. By the end of January, 2022, the total number of registrants had grown to over 700. Much of this growth may be attributed to the Council's inauguration of its insurance incentive scheme which commenced in September, 2020. This new approach to expanding its Register is underpinned by the JCCP's commitment to maintain the highest entry standards and use rigorous processes by which Registrants are admitted in accordance with our pledge to prioritise public protection and patient safety. The JCCP Council considers that by continuing to work in alliance with aesthetic insurers is a practical and logical step to encourage and develop safe practice and practitioners. The JCCP believes that by overlaying its robust entry requirements to those of the 'reputable' insurers and integrating processes will lead to larger numbers of practitioners registering with the JCCP which will in turn enhance and embed public protection across the sector. The JCCP believes that by increasing the number of Registrants on its

Practitioner Register, their confirmation to practise in accordance with both CPSA and JCCP standards will further assist us in meeting our aim of assuring public safety. Throughout the year the Council has implemented robust systems of data integrity audit to ensure that public facing data relating to Registrants is accurate in compliance with PSA standards and requirements.

CHALLENGES and SOLUTIONS.

This reporting year has once again been quite an unprecedented year for the JCCP and for the aesthetics sector. Unfortunately, as is often the case when systems and processes are challenged the JCCP has received multiple complaints regarding non-JCCP Registrants regarding practice related issues and from members of the public/practitioners regarding exaggerated or misleading claims about the quality, standard or advertising of education and training courses. The JCCP has taken each complaint seriously and has undertaken to contact each Complainant and where appropriate to refer them on to other relevant organisations in order to seek resolution. The JCCP Trustee Board now receives a quarterly ‘complaints’ summary/report for discussion and consideration at each meeting. The complaints process and related activity is most competently co-ordinated and led by JCCP Trustee Sally Taber.

In particular the Council has again made multiple referrals to the Advertising Standards Authority this year regarding inaccurate or exaggerated advertising claims made by a range of aesthetic education and training organisations. These matters have been raised in accordance with the JCCP’s concordat with the ASA. This year a range of complaints referred by the JCCP have been considered to meet the ASA’s threshold standard for formal investigation and application of ‘enforcement notices. A further thirty complaints have been referred to the ASA this year in accordance with the JCCP’s commitment to provide both members of the public and practitioners with assurance that training companies who practise in the aesthetics sector do so in a safe and appropriate manner, without compromise to patient safety and public protection.

Another area of significant concern has related to the proliferation of the use of remote prescribing for prescription only medicines with particular regard to the prescription of toxins. The JCCP has published a range of statements this year regarding remote prescribing for third party practitioners and use of unlicensed medicines and products and has held meetings with professional regulators, such as the NMC to seek their formal intervention in calling for the cessation of these activities. The JCCP will continue to work with the professional regulators, such as the GMC and the NMC to encourage them to publish definitive guidance on the need for face-to-face consultations prior to prescribing prescription only medicines for members of the public who seek aesthetic treatments.

Despite these challenges once again the JCCP has not received any formal complaints regarding the Council or its associated activities. One complaint was received regarding on the JCCP registrants during the year which was given investigated fully in accordance with the first stage of the JCCP’s Fitness to Practice procedures. This complaint resulted in no further action being required and the provision of a comprehensive and detailed report to the Registrant’s professional statutory regulatory body that outlined evidence to support the rationale for this decision.

One other area of concern relates to the fact the sector remains divided on a number of fronts regarding recognition of the ‘right’ of allied health professionals, dental hygienists and pharmacists practising non-surgical aesthetic procedures. These matters continue to be debated actively within the sector with the JCCP engaging with professional organisations with regard to factual accuracy and through active and productive dialogue with the responsible Professional Statutory Regulatory Bodies (PSRBs), product manufacturers, the Medicines Healthcare products Regulatory Agency (MHRA) and pharmacy suppliers.

The JCCP has also published guidelines this year on best practice with regard to aesthetic insurance in partnership with Hamilton Fraser. These guidelines have been formulated to encourage members of the public to seek services from appropriately qualified and insured practitioners who have access to adequate levels of medical indemnity insurance and access to redress schemes.

REGULATORY AND CAMPAIGNING ACTIVITIES - 2021-2022

This year the JCCP has continued to develop and progress a range of public safety campaigns that are designed to have a positive impact on patient safety and public protection. In particular the JCCP has worked closely with the DHSC, the MHRA and the CQC and with a range of other regulators within the United Kingdom with one

aim – to promote patient safety and to enhance public protection. At the heart of the JCCP’s mandate is a call to introduce statutory regulation for the aesthetic sector, whilst reducing the burden of multiple inspections for registered healthcare practitioners and their clinics. In July this year the All-Party Parliamentary Group for Beauty, Aesthetics and Wellbeing advised that they were unable to call for a national system of *statutory* regulation for the sector but recommended the design and implementation of a national aesthetics licencing scheme for England. The JCCP applauds this aim and acknowledges that the APPG has built upon the key tenets set out in the Council’s own Ten Point Plan (April, 2021) that sought to inform a new system of regulation for the aesthetics sector in the UK. One of the ten points relates directly to options for a potential licensing system. The JCCP has advised that all aesthetics treatments at levels 6 and 7 that are specified in the JCCP/CPSA Competency Framework should be regarded as being subjected to a rigorous system of either CQC regulation or licensing and oversight due to the level of risk and harm that can potentially occur if injectables, fillers, cogs, threads, invasive lasers, and deep chemical peels etc. are administered. *The JCCP believes that only appropriately trained, registered, and regulated healthcare professionals should be involved in the administration of Level 6 and 7 treatments as defined in the JCCP/CPSA Competency Framework.*

The JCCP considers also that a national licensing regime should require all practitioners to provide evidence of adequate medical indemnity insurance cover and also provide patients/members of the public with access to a redress scheme should a complaint arise. In our opinion the licencing regime should also ensure that non-prescribing practitioners have access to an appropriately qualified and registered prescriber who acts as an accountable supervisor and who provides a face-to-face assessment of members of the public before any prescriptions are provided to a third-party practitioner in accordance with the advice provided by the JCCP. Details of the designated prescriber should be inspected as part of the regime. The licensing regime should also make provision for the safe and ethical sourcing, distribution and administration of products and medicines that have been approved by the MHRA (for example toxins and dermal fillers).

In the absence of a government mandate to implement a national system of statutory regulation for the aesthetic sector the JCCP has formed an association with a range of policy influencers and regulators, such as the Chartered Institute of Environmental Health, the Local Government Association and with the Institute of Licencing and others with the aim of lobbying the UK Government to mandate the need to implement a local authority licensing scheme across the United Kingdom in order to protect members of the public from the consequences of unregulated and unsafe aesthetic practice. The JCCP continues to campaign actively with other like-minded bodies for statutory regulation as the Government considers its response to the APPG Report.

Regardless of whatever system of regulation is proposed, the JCCP has lobbied this year for the creation of a national system of licensing that includes adequate auditing for qualifications, possession of appropriate insurance cover, the safe supply and use of products/medicines and the provision of safe, ‘harm-free’ premises. In addition, the JCCP is of the opinion that any licencing scheme must include the implementation of sanctions when aesthetic service providers are unable to evidence compliance with mandated measures/standards. This will require the implementation of specific powers for Local Authority Enforcement Officers to enable them to deal immediately and effectively with non-compliant practitioners for a wider range of aesthetic procedures in the future.

As such the JCCP will continue to work with the CQC, the MHRA and the CPSA to undertake an evidence-based risk assessment of a range of more invasive cosmetic procedures with the aim of determining whether further restrictions, controls and regulations should be implemented in the interests of public protection (such as requiring all practitioners to possess the required knowledge and skills to perform aesthetic procedures safely and effectively and to be trained to a nationally determined ‘minimum’ standard).

The Council will also continue to use existing networks and expertise provided by the CQC, the MHRA, The Chartered Institute of Environmental Health (CIEH) and the Institute of Licencing (IoL), to exert political influence and to ‘lobby’ for change to develop and implement legislation that is ‘fit for purpose’, responsive and adequate to protect members of the public without placing any undue burden on practitioners who are already subject to regulatory inspection.

From a positive perspective the JCCP was delighted to have contributed to the formulation and the implementation of ‘The Botulinum and Cosmetic Fillers (Children) Act’ which became legally enforceable on the 1st of October, 2021. Since that date the JCCP has been made aware of a number of practitioners who are continuing to provide (and perform) non-medical treatments to underage persons. The JCCP has since engaged in a campaign to ensure that such practitioners are reported to legal enforcement officers. The JCCP has alerted all of its practitioner registrant members of the importance of ensuring that no non-medical aesthetic treatment is provided to a person under the age of 18.

SAFE PRODUCTS, SAFE SUPPLIERS, SAFETY in BEAUTY and PROMOTING POSITIVE WELLBEING and MENTAL HEALTH CAMPAIGN UPDATES

Specific Campaign Themes

1 - Reporting of Adverse Incidents and 'Near Misses' – Progress Update

The role of the MHRA and the importance of the 'Yellow Card' procedure has been acknowledged by the JCCP Clinical Advisory Group with the aim of seeking to ensure that all practitioners report any 'near misses', untoward incidents and adverse outcomes to inform the evidence base for quality/service improvement. The JCCP has also acknowledged that there is a need to better co-ordinate and consolidate the way in which complications and adverse events are reported and acted upon with the aim of reducing harm and improving public safety and service improvement/effectiveness. As such the MHRA and the JCCP convened a meeting with all key parties in July, 2021. This round table event was attended by a significant number of representatives from the aesthetic sector. A range of key priority themes were agreed for further consideration by the MHRA including the need to better coordinate the reporting of adverse incidents.

The importance of identifying, publicising, and implementing a consistent approach to report adverse incident and 'near miss' reporting was considered to be essential if an effective 'person safety and public protection' culture is to be imbued across the sector. This includes challenges faced by practitioners, product manufacturers, pharmacists and regulators to provide safeguards to the public in respect of the appropriate and legitimate ways in which clinical complaints should be collected and reviewed and 'patient' activity data gathered, collated and reported to the MHRA (and to others) with the aim of informing best/safe evidence-based practice in the sector with regard to the use and application of medicines, devices and procedures used in the non-surgical cosmetic sector.

It was also agreed that more needs to be done in the adverse reporting area to enable the MHRA to build on and extend the Yellow Card reporting system and to extend knowledge about its use to the non-healthcare professional beauty market where many thousands of unregulated beauty therapists are applying invasive treatments such as the injection of toxin, the insertion of dermal filler devices and using invasive lasers.

A shared aim was agreed to continue to discuss and explore whether the current regulatory framework for non-surgical cosmetic special treatments and hair restoration surgery is sufficient to ensure that adverse incidents are reported to protect and safeguard the public from undue harm or consequence. It was agreed that there was a need to 'identify the key challenges relating to the range and scope of current forms of 'clinical' complaints reporting and adverse incident reporting and to identify/confirm current guidelines or protocols for safe, effective complaints reporting, monitoring, theme analysis, market surveillance and adverse incident reporting and to make recommendations for their potential enhancement'.

The JCCP has supported the MHRA and considers that ultimately, a unified dataset will be required for the collation and sharing of information between the authorities. This unified standard might then also be used with other organisations with an interest in data collection, product manufacturers, professional associations for instance, who might support the work of our organisations.

2 - Best Practice in Consultation and Informed Choice

The JCCP has worked with Transform to produce a series of public facing 'best practice' guidance/videos for practitioners with regard to initial person-based assessment, consultation, cooling off periods, including the JCCPs associated psychological/emotional/mental health wellbeing within the sector. This work stream has now been completed focuses on positive messaging, the use of screening tools and advises on what practitioners need to be assessing/looking out for during consultation in the interests of public protection. The resultant video clips will be published on the JCCP website when it launches next year.

3 – Promoting Positive and Informed Psychological and Emotional Health

The JCCP has continued to work actively with the Mental Health Foundation throughout the year to promote positive and effective messaging to consumers and practitioners, including responsible marketing and the appropriate and ‘safe’ use of social media/Apps that support and promote positive mental health and wellbeing. As a result of this work a series of user guides were published in July, 2021. These guides relate to the Under 18s, Parents and for Adult Consumers.

The JCCP has also continued to work closely with the Mental Health Foundation to enhance psychological and emotional well-being for members of the public who seek to receive aesthetic treatments. Key areas of activity include the presentation of oral evidence to the All Party Parliamentary Group for Beauty, Wellbeing and Aesthetics, The provision of advice to MPs and Civil Servants Parliamentary Private Members Bill to restrict the age of access to non-medically determined aesthetic procedures to over 18s and engagement with the Luke Evans Parliamentary Private Members Bill on ‘Digitally Altered Body Images’ (2020) and the provision of parliamentary briefings regarding proposed amendments to the Health and Care Bill (2021).

4 – Safety and Beauty Update

Key issues that have been considered this year have included:

- Promoting best practice amongst insurance companies with regard to patient risk and to review the role that they play in affording ‘credibility’ to a wide range of disparate practitioners and providing assurance to the public that the practitioners they insure are competent and appropriately trained to practise in ‘safe’ premises and that they are using safe and ethically sourced products; the need to seek to promote mandatory insurance requirements for all practitioners.
- Promotion of the JCCP’s position statement to require that all practising non-healthcare practitioners who insert fillers and who inject toxins are required to provide independently verifiable evidence that they meet the requisite 2018 JCCP Competence Framework training standards. Whilst the JCCP continues to mandate that non-healthcare practitioners who insert fillers and who inject toxins will not be admitted to its Practitioner register at this time the JCCP considers that all practitioners should be required to provide such independently verifiable evidence that they meet the requisite 2018 JCCP Competence Framework training standards in order to demonstrate their proficiency, capability and knowledge to practise safely in the interests of public protection. In this way the JCCP believes that better regulation would be achieved, and that the Government would be able to be seen as responding to consumer demand and public safety at a time when the market is expanding and risks to public safety are increasing.
- The JCCP has advised also that only Ofqual (or UK national equivalent regulator) regulated qualifications should be used to determine educational competence in aesthetics (with the proviso that such qualifications should be robustly mapped against and comply with the CPSA and JCCP competence standards).

SOCIAL MEDIA COVERAGE

Throughout the review period the JCCP has worked fervently to promote the ‘JCCP’ brand and to make members of the public and of the practitioner community aware of the importance of public protection and patient safety. The brand is now very well established through a range of traditional and social media channels. For example, the following statistics were obtained from the JCCP’s website and social media management team that confirm activity and ‘reach’ from January 2021 – December, 2021:

JCCP Month-by-Month Social Media Statistics: January 2021 – December 2021

JCCP		January	February	March
Facebook	Total Page Likes	5,761	5,764	5,769
	Post Engagements	508	690	135
	Reach	2,696	2,609	1,667
Twitter	Total Followers	523	526	527
	Profile visits	1,083	781	626
	Impressions	5,134	5,976	6,451
LinkedIn	Followers	271	273	276
	Likes	32	28	46
	Shares	10	11	4
	Peak Clicks	28	21	29
Total impressions		1,173	1,027	1,120

JCCP		April	May	June	July	August	September	October	November	December
Facebook	Total Page Likes	5,746	5,753	5,736	5,739	5,726	5,722	5,854	5,863	5,856
	Post Engagements	142	704	196	251	762	517	4904	786	513
	Reach	1,699	4,248	1,825	2,935	5,552	7,733	17,985	5,417	3,847
Twitter	Total Followers	535	538	546	555	564	577	585	596	603
	Profile visits	1,201	1,755	2,355	1,560	1,528	1,420	1,805	2,499	1,160
	Impressions	8,290	5,698	6,078	9,529	7,801	11,000	5,078	5,399	3,812
LinkedIn	Followers	291	303	311	326	333	351	378	387	395
	Likes	81	76	119	67	44	100	111	63	47
	Shares	5	17	8	13	19	33	18	3	6
	Peak Clicks	42	52	82	78	99	116	125	79	76
	Total impressions	2,426	2,917	3,178	2673	2426	2924	3308	2879	2,470

Summary

Facebook

Total page likes: 5,856 Page like increase: 84

Total post engagements: 10,108

Total people reached: 58,213

Twitter

Total followers: 603 Follower increase: 84

Total profile visits: 17,773

Total impressions: 80,256

LinkedIn

Total followers: 395 Follower increase: 126

Total engagements: 1,788

Total impressions: 28,521

Glossary of key terms:

Post engagement: the total shares, likes, clicks and comments made on content.

Impressions: this is the number of times users have seen your Tweet in a timeline, search result or from your profile.

Profile visits: the number of times users visited your profile page.

Reach: the number of people who have seen your content.

In excess of fifty national media broadcasts have made this year by JCCP Trustees on local and national radio and twenty-eight Pod Casts have been produced throughout 2021. Twenty-eight journal articles/editorials have also been published. Attendance at five planned national aesthetic trade shows and conferences occurred this year despite national Covid-19 restrictions. This level of activity confirms the success of the JCCP's pledge to raise awareness of the JCCP 'Brand' amongst members of the public and practitioner community.

OTHER SIGNIFICANT ACHIEVEMENTS.

The JCCP continues to work very closely with five Professional Statutory Regulatory Bodies (PSRBs) this year:

- The GMC (The General Medical Council)
- The GDC (The General Dental Council)
- The NMC (The Nursing and Midwifery Council)
- The GPhC (The General Pharmaceutical Council)
- The HCPC (The Health Care Professions Council)

Memoranda of Understanding remain current with the General Medical Council (GMC), the General Dental Council (GDC), the Nursing and Midwifery Council (NMC) and with the General Pharmaceutical Council (GPhC) who together recognise the importance of joint working to ensure public protection and patient safety. These agreements continue to seek to ensure that effective channels of communication and information sharing are established and maintained between the named PSRB and the JCCP to promote patient safety and high quality services for patients receiving aesthetic treatments and where appropriate and necessary, the processes and procedures adopted by the JCCP and the PSRB, with regard to matters of ‘fitness to practise’ for registered clinicians involved in the provision of aesthetic treatments, are aligned to promote patient safety and public protection. In addition, the memoranda relate to the areas of interface between the named PSRB and the JCCP and clarify respective roles and responsibilities and outline mechanisms in place to promote effective liaison. A formal exchange of letters has also established a firm working relationship with the HCPC. Separate meeting took place with the CEO/Registrars of the HCPC and NMC in August and November 2021 respectively. Formal contact has also been established with the Pharmaceutical Society for Northern Ireland. Bi-monthly meeting continue to take place with the GMC and the GDC.

The JCCP recognises the important role that professional prescribers make to public protection and of the contribution that they make to the development and maintenance of a robust and effective patient safety culture in the aesthetic sector. The JCCP (and the CPSA) continued to strive during 2020 to promote and develop standards and best practice across the whole of the non-surgical and hair restoration surgery sector and to promote and publicise the same to the public. The publication of our guidance on ‘Responsible Prescribing for Cosmetic Practitioners’ continues to be very well received and disseminated across the sector and demonstrates the Council’s commitment to signposting and promoting safe and effective practice within the aesthetic sector. Conversations with the relevant PSRBs have taken place this year with regard to the need to monitor remote prescribing across the aesthetics sector. This year the JCCP has continued to strengthen its working relationship with the Royal Pharmaceutical Society (RPS) who have provided valuable assistance on matters of prescribing guidance. The JCCP also made a significant contribution to the 2021 RPS prescribing consultation exercise which resulted in positive changes with regard to cosmetic prescribing practice being cited in the RPS Prescribing Standards (2021). The RPS now include the JCCP logo on their [Competency Framework for all Prescribers](#).

The JCCP/CPSA Code of Practice continues to be applied throughout the Council’s work and assumes that any practitioner who undertakes cosmetic treatments is embarking on a new career pathway, associated with significant risk of harm to patients and members of the public. The JCCP therefore applies and promotes the use of a range of fitness to practise procedures that are designed to promote best practice within the sector and to set out guidelines appropriate to all levels of practitioner as to the risks involved and how to mitigate them, alongside the implementation of sanctions if required. These procedures apply to all aesthetic practitioners, regardless of level of attainment or professional background. These procedures (and their associated sanctions) apply equally therefore to those cosmetic practitioners who are registered clinicians and to those who do not have registerable status with a Professional Statutory Regulatory Body (PSRB) and who perform procedures that the JCCP formally recognises and has agreed to register. Our aim continues to provide a practitioner with a sense of belonging to this applied area of practice and to outline the duty of care that they should provide to the public and to other practitioners.

The JCCP Practitioner Register Committee published two Practitioner Newsletters during 2021 in which Registrants (and members of the public) were provided with details of the JCCP Practitioner Register annual renewal process and sampling requirements and were updated regarding the JCCP’s developments and were presented with explicit advice on safe practice and working arrangements during the Covid-19 pandemic period. Web Links sent via individual emails were also provided to all JCCP registrants regarding key Council policies and procedures that related to Covid-19 and to the JCCP/CPSA Standards and Code of Practice.

Clinical Advisory Group Activities

The JCCP Clinical Advisory Group (CAG) has met throughout the year in a bi-monthly basis under the joint Chairmanship of Dr. Paul Charlson and Andrew Rankin. The key aim of the CAG has been to work alongside the CPSA to inform, adopt and promote practice standards for the non-surgical and hair restoration sector. The CAG has also provided a forum to support clinical leadership, advice, scrutiny, and challenge with regard to clinical practice related matters to the JCCP Trust Board. In particular the CAG has:

- Championed clinical excellence for patients and members of the public.
- Advised on clinically related professional healthcare aspects of operating the JCCP Registers.
- Provided clinical advice and oversight in relation to JCCP policies and activities.
- Provided an overarching forum to co-ordinate discussion and to formulate opinion on matters relating to the use, supply and administration of safer products/medicines, the provision of standards and systems of inspection for safer premises and safe working practices.
- Assisted the JCCP in the formulation of any new policies that require a clinical input and focus.
- Raised and responded to major issues of clinical concern on operational performance within the cosmetic sector.
- Advised on and supported the development of solutions to current and emergent clinical issues.
- Advised on compliance requirements relating to legal, policy and regulatory frameworks of practice within the four countries of the UK.
- Responded to and advised on clinically related enquiries from the media, government agencies, members of the general public or practitioners.
- Provided an extensive response to the MHRA consultation on the future regulation of medical devices.

Specific issues that have been the subject of consideration of CAG this year are:

- Hyaluronidase – concerns about overuse, risk and adverse events including long term adverse outcomes for the purpose of ‘horizon scanning’.
- Prescription medicines that are available online without a prescription.
- Proliferation in the inappropriate prescribing and supply of unlicensed brands of botulinum toxin (e.g., Botulax)
- Adverse event reporting which provides clarification on, and encourages consistent and appropriate reporting (see earlier reference to this area of activity)
- Parallel importing working with the MHRA as part of the objective towards safe and ethical product supply, to advise that parallel importing of dermal fillers is not appropriate.

One other key work stream progressed by the Clinical Advisory Group related to the need to seek clarification on what constitutes a ‘Medical’, ‘Medically-related’ or ‘Cosmetic’ Procedure. The CAG considered a number of legal determinations to inform this work stream and published guidance on what constitutes a ‘Medical’, ‘Medically-related’ or ‘Cosmetic’ Procedure in May, 2021. This guidance document has since been used by professional associations to support guidance to members and by regulators to assist in enforcing regulation, aided by a better understanding between regulators and industry. This paper has also been used by government and policy makers (e.g., the guidance paper was referenced by the APPG for Beauty, Aesthetics and by UK government policy advisors) to inform new regulation and to enhance both public and stakeholder confidence in the aesthetic industry.

The JCCP’s Memorandum of Understanding with the MHRA is transacted through the MHRA’s active membership of CAG. The JCCP’s Key Opinion Leaders are also invited members of the JCCP’s Clinical Advisory Group.

Adjunctive Therapies/Orphan Treatments

This year the JCCP has continued to promote its 2019 ‘Adjunctive Therapies/Orphan Treatments’ policy following a request to develop the same by the Professional Standards Authority last year. The PSA invited the JCCP to consider this issue as part of the 2019 Annual review process in order to provide members of the public

with informed assurance about the practitioners who perform such treatments. The JCCP continues to accept that our registrants may elect to perform adjunctive and/or orphan therapies. Adjunctive therapies relate to any non-surgical aesthetic procedure that a Registrant performs in addition to those registered modalities that are formally recognised by the JCCP. These may include, for example, the adjunctive use of injectable local anaesthetic or stand-alone treatments such as plasma - 'PRP' or 'energy based'. The JCCP advises that it is important to understand that these treatments are not *currently* recognised by the JCCP or CPSA as 'registered modalities' and as such the Council has not set or adopted benchmark standards of proficiency for these treatments and is unable endorse evidence of practitioner competence to perform them safely or effectively. While the JCCP does not ask Registrants to refrain from offering "adjunctive" / "orphan" treatments, the Council does expect that all registered members apply their professional standards and ethical responsibility to uphold client/patient safety and public protection at all times, irrespective of the status of the procedure.

The JCCP advises also that it is also important that registrants do not suggest or imply to their clients/patients that the treatment being provided by them is recognised by the JCCP or that their competence to perform such procedures has been verified or endorsed by the Council. The following web link provides access to the policy statement informs and reminds all registrants on both parts of the JCCP Practitioner Register of the expectations they should consider when carrying out *any* treatment with regard to safe, ethical and responsible practice – <https://www.jccp.org.uk/ckfinder/userfiles/files/AdjunctiveTherapiesStatementFinal.pdf>

The JCCP is currently working with the CPSA to identify a range of emergent treatment modalities which are regarded to have a proportionate degree of risk associated with their transaction. The CPSA and the JCCP will explore options to develop new practice and educational standards for these modalities over the next twelve months.

Hair Restoration Surgery

In addition to the non-surgical aesthetic industry, the JCCP is also the recognised self-regulator for Hair Restoration Surgery (HRS) which encompasses Hair Transplant Surgery (HTS) and Prosthetic Hair Fibre Implantation (PHFI).

The Cosmetic Practice Standards Authority (CPSA) and JCCP guidance is that only doctors with a GMC licence to practice should perform the surgical steps of a hair transplant procedure. This is not currently being adhered to in the UK and it is widely known within the profession that there are non-doctor hair transplant surgical assistants who make cuts in the skin of patients during follicular unit excision (FUE) donor hair harvesting. These hair transplant surgical assistants come from a variety of backgrounds and, apart from a small minority who are registered nurses, have no accredited qualifications and do not belong to any regulatory body. Therefore, they have no regulatory oversight yet have significant patient clinical contact. The JCCP considers that there is a need for greater regulation of the HRS sector.

The JCCP has a close working relationship with the British Association of Hair Restoration Surgery (BAHRS) and has successfully implemented a pathway for eligible hair transplant surgeons to join the Register. The JCCP also hosts a complaints portal for non-registrants including hair transplant surgeons and clinics which the BAHRS refers complainants to with the aim of providing helpful data in the future. Throughout the reporting year the BAHRS has continued to provide advice to the JCCP in all matters related to Hair Restoration Surgery. The JCCP endorses the CPSA standards for hair transplant surgery and will continue to lobby for ethical HRS practice. Interestingly the General Medical Council has also made reference to the application of CPSA standards to the hair restoration surgery (HRS) profession as may be evidenced on the BAHRS website <https://www.bahrs.co.uk/patient-advice/gmc-response/> .

Other Notable Matters

This year the JCCP has continued to focus attention on matters relating to cultural diversity and the celebration of difference. The JCCP published a policy position on Equality, Inclusivity and Diversity in November, 2021.

The JCCP/CPSA Code of Practice requires all practitioners who provide cosmetic interventions to perform an annual audit and engage in either statutory or non-statutory appraisal/peer review and supervision, revalidation and/or CPPD activities that are prescribed by the JCCP, without which patient safety cannot be assured. The aim of this exercise is to collect data to evidence safety of patient care and the prevalence of adverse events and poor

outcomes in the sector and thereby to contribute to the empirical evidence base to inform risk calculation and proportionate government response to protect the public from undue harm or from avoidable variations in procedural practice. The JCCP Practitioner Register sampling process is designed to provide the Council with the assurance required to confirm that Registrants are maintaining activity logs and audit returns.

The JCCP continues to maintain a close and excellent working relationship with our data analytical partner *NEC Software Solutions (previously Northgate Public Services)* throughout the review period. Northgate/NEC Software Systems has been JCCP's informatics partner since 2017, working closely with us to develop data collection and analysis services which report activity across all treatment modalities as well as the incidence of complications and adverse events. Their systems continue to enable practitioners to upload data to evidence performance over the previous year and for the subsequent analysis to be made available to clinical experts from CPSA, who ensure whether or not their standards are being adhered to. Patrick Palmer, Business Consultant at NEC Software Solutions has also been appointed this year as Vice Chair of the JCCP Practitioner Register Committee where he leads and advises on data integrity. NEC Software Solutions have once again graciously provided pro bono support to the JCCP throughout 2020/2021.

The JCCP has also continued to promote the use of the Council's safe premises standards for implementation across the sector and has produced and disseminated ethical guidelines for trade show demonstrations, simulation, and exhibitions.

The JCCP has also continued to work closely with the Chartered Institute of Environmental Health and through the Council's appointed 'Environmental Health Trustee' has worked actively in England, Wales and Scotland to raise awareness of public protection issues relating to aesthetics and to respond directly and purposefully to concerns raised by Local Government Environmental Health Officers with the aim of better informing and developing more responsive and enforceable regulation on the 'High Street' for the multiple 'beauty salons' that trade there. The JCCP presented at a joint CIEH national webinar in October, 2021 for this purpose.

The JCCP has also continued to work collaboratively with the Care Quality Commission (CQC) and the 'MHRA' this year regarding the provision of safe treatments, premises regulation, product and device standards and prescribing regulations. The overarching objective of these discussions continues to facilitate discussion and the establishment of common ground for the formation of understanding between relevant authorities – the 'MHRA', the CQC and CPSA/JCCP. The JCCP transacts an established and respected working relationship with both the CQC and 'MHRA', sharing a common interest 'in patient and product safety'. A series of virtual meetings have been held again this year with both organizations, complemented by a regular exchange of correspondence.

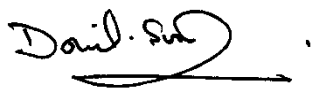
In accordance with its UK remit the JCCP has also continued to work actively with the Deputy Medical Director with the Scottish Government and continues to share intelligence regarding the Council's activity and the work and application of the JCCP's standards and regulatory intentions. In England meetings, teleconferences and correspondence has been exchanged regularly with the DHSC Team that holds responsibility for cosmetic regulation. The JCCP Chair also attended regular meetings with representatives of the All-Party Parliamentary Group (AAPG) on Beauty, Wellbeing and Aesthetics during 2021 to discuss cosmetic regulation and to make a case for statutory regulation for the sector, with particular regard to mandating a minimum standard of educational competence for all practitioners who deliver invasive treatments in the sector. Active liaison with the AAPG and with Parliamentarians from both the House of Commons and the House of Lords continues. The JCCP's facilitation and engagement with key Government representatives, MPs and with regulatory agencies provides evidence of the Council's transaction of its core mission – public protection and patient safety.

The JCCP has also engaged regularly with other key sector stakeholders. For example, meetings have been held throughout the year with insurers and indemnifiers, pharma and product manufacturers and suppliers and with education and training provider organisations. As a result of such engagement the JCCP has appointed representatives from the Insurance sector, Pharma companies and Pharmacy distributors to its Committees and to its Trustee Board.

Meetings have continued this year with the major UK Clinic Chain CEOs – sk:n and Transform. Effective lines of communication have now been established between the main clinic chains and the JCCP with the aim of promoting the Council's standards and transacting shared consumer-facing projects in the interests of patient safety.

Other key priorities for 2022 are to:

- **Enhance the Council's role in data collection and adverse incident reporting.**
- **Produce and implement a consumer/public facing website**
- **Work with the CPSA on setting standards for new emergent treatments/modalities.**
- **Further raise consumer awareness of risk associated with the higher level/invasive procedures.**
- **Call for a clearer definition regarding medical, medically related and cosmetic procedural interventions.**
- **Seek Government support for the implementation of a robust system of statutory regulation and licencing for the aesthetics industry.**
- **Growing and developing the JCCP Corporate Membership Scheme for commercial partners in the aesthetics sector.**
- **Campaigning for the full implementation of the JCCP 10 Point Plan.**

A handwritten signature in black ink, appearing to read "David Sines", with a long horizontal flourish underneath.

Professor David Sines CBE PhD FRCN
Executive Chairperson and Registrar JCCP
March, 30th 2022