



Joint Council for Cosmetic Practitioners (JCCP) The Cosmetic Practice Standards Authority (CPSA)

Public Narrative

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Key messages

The JCCP and the CPSA say:

- There should be statutory regulation to ensure that only cosmetic practitioners who meet the required standards for safe and effective practice can practise legally.
- There should be national, mandatory education and training standards for all practitioners.
- High-risk treatments, such as injectable toxins, fillers, invasive lasers, vitamin infusions, threads and 'deep' peels should only be administered by suitably trained and qualified healthcare professionals.

Introduction

The Joint Council for Cosmetic Practitioners (JCCP) is a UK national body that registers practitioners and approves education and training providers, in the fields of non-surgical cosmetic treatments and hair restoration surgery.

The JCCP exists to provide a source of information and guidance for patients and members of the public with the key remit of ensuring patient safety and enhancing public protection.

The JCCP is accredited by the Professional Standards Authority which is accountable to Parliament and which oversees the regulation of health and care professionals working in occupations that involve statutory regulation (for example, doctors, **registered** nurses, dentists, pharmacists and allied health professionals). The Professional Standards Authority also accredits registers of health and care practitioners in those areas that are not yet regulated by law. The JCCP operates an accredited register for practitioners in the fields of non-surgical cosmetic treatments and hair restoration surgery.

The JCCP is also a charity registered with the Charity Commission and governed by a Board of Trustees. To become a not-for-profit charity JCCP has had to demonstrate that it is operating for 'public benefit' which in this case means 'patient safety' and 'public protection'. The JCCP operates across the UK in England, Scotland, Wales and Northern Ireland.

The JCCP and the Cosmetic Practice Standards Authority (CPSA)

The JCCP and the Cosmetic Practice Standards Authority (CPSA) are sister organisations. The CPSA is an expert group of clinical specialists, with patient/public representation, that prioritises experience, evidence and patient safety.

The CPSA sets the standards which anyone who wishes to perform non-surgical cosmetic treatments must meet, whatever professional background they are from. Practitioners who meet these standards can join a register held by the JCCP. Members of the public can select a practitioner from the register, knowing they meet the standards established by the CPSA.

The JCCP and the CPSA were both established in response to a review into cosmetic practice led by Professor Sir Bruce Keogh in 2013. This review followed in the wake of the PIP (Poly Implant Prosthèse) breast implant scandal. The Keogh review also focussed on non-surgical cosmetic treatments and highlighted several areas of concern.

The non-surgical sector has expanded exponentially in recent years and the CPSA estimates that such procedures now account for 9 out of 10 of all cosmetic interventions, with the remainder being surgical.

The JCCP and CPSA have jointly developed a Code of Practice for practitioners who provide non-surgical cosmetic interventions. Amongst other things it requires practitioners to promote safety and patient wellbeing, always seek consent, provide adequate information, consider patients' psychological and emotional needs and have indemnity and liability insurance.

Treatments and challenges

The JCCP has been established to set standards for and to consider both the benefits and the risks associated with non-surgical, anti-ageing treatments and hair restoration surgery. The treatments that we currently include:

- Botulinum toxin injections
- Dermal fillers
- Skin rejuvenation including micro needling and skin peels
- Laser and light therapy
- Hair restoration surgery

In recent years the JCCP has witnessed a growing number of harmful complications arising from such treatments many of which have been the result of sub-standard treatment administered by inappropriately qualified and poorly trained practitioners. We are also seeing gross misrepresentation of the benefits of treatment, not least on social media and other online platforms.

At the heart of the problem is a serious lack of independent information and advice for the public and the simple fact that this is an area that requires statutory regulation.

The Health and Care Act (2022)

The government has agreed to introduce a new system of licensing for England for non-surgical cosmetic procedures.

The JCCP warmly welcomes this latest development which takes the form of an amendment to the Health and Care Bill, tabled by the government. It will give the Secretary of State for Health and Social Care the power to introduce a national licensing regime, the scope and details of which will be determined after a public consultation.

The new licensing regime is designed to safeguard people who access invasive cosmetic treatments and follows new legislation that was introduced last year making it illegal to administer dermal fillers and injectable toxin treatments to under 18s. The licensing scheme will introduce consistent standards that individuals carrying out non-surgical cosmetic procedures will have to meet, as well as hygiene and safety standards for premises.

The government has described the amendment as the next step on the road to effective regulation of non-surgical cosmetic procedures (and hair restoration surgery) in England.

CPSA Chair, Mr. Alex Woollard: "As we now embark on the next hurdle in the quest to improve patient safety in this sector; we welcome the Government move regarding legislation. Work must now continue in earnest to ensure that the standards consulted upon and adopted protect the public to the level that they expect and deserve. The CPSA will avidly support this process, in any way that we are able, with the wealth of experience amongst our founding specialty associations."

JCCP Ten-point plan

The new licensing regime complements and fits well with the JCCP's ten-point plan of action which says we believe there should be:

- Statutory regulation to ensure that only practitioners who meet the required standards for safe and effective practice can practise legally.
- National, mandatory education and training standards for all practitioners in these fields.
- Clear, transparent information from service providers on risks, benefits, costs, qualifications, and insurance.
- A clear, legal definition of what constitutes a 'medical' procedure, a 'medically-related' service and a 'cosmetic' treatment.
- Robust standards and regulation for the safe, ethical and professional prescribing of medications and preparations.
- Tighter controls on advertising and social media posts to prevent the promotion of unsafe, unethical and exaggerated messaging about products, education, training and service provision.
- A nationally agreed process for the reporting and analysis of complications and adverse incidents.
- A legal requirement that all cosmetic non-surgical and hair restoration surgical practitioners should hold an appropriate level of medical indemnity insurance to provide a proper redress scheme for service users.
- Nationally agreed standards for the licensing and regulation of premises and treatment procedures.
- A campaign to raise public awareness of the benefits and risks associated with non-surgical treatments and hair restoration surgery.

Clinicians "holding the needle"

The JCCP and the CPSA are calling for the statutory regulation of cosmetic treatments involving injectables, fillers, invasive lasers, 'deep' peels, threads, vitamin infusions and other invasive treatments and says these should only be administered by suitably trained and experienced regulated healthcare professionals.

Our call for statutory regulation followed the publication, in July 2021, of a report on aesthetic cosmetic procedures from the All-Party Parliamentary Group (APPG) on Beauty, Aesthetics and Wellbeing. The APPG recommended a national licensing regime to be introduced across England along with certain minimum training and qualification standards for practitioners conducting aesthetic treatments, but it fell short of recommending statutory regulation. The JCCP and the CPSA welcomed the APPG report and urged the government to act on the recommendations as quickly as possible but the JCCP and the CPSA said it was clear the government needed to go further.

Prof. David Sines CBE, the Chair of the JCCP said, "After a lengthy period of discussion with practitioners, consumers, patients, stakeholders and politicians we have concluded that in the interests of patient safety and public protection, high-risk and potentially harmful procedures, such as the insertion of dermal fillers or the injection of toxins should only be administered by appropriately trained healthcare professionals."

In early 2022 the JCCP played a pivotal role in influencing Parliamentarians to support the amendment that the JCCP and others tabled in the Autumn of 2021 to the Health and Care Bill, which has now made its way through to the final stage in Parliament. The Government's resultant health and Care Act will introduce a mandated licensing regime for the more invasive cosmetic treatments and make it an offence for someone to practise without a licence and to practise from unlicensed premises.

Protecting the Public - Key Mechanisms

The JCCP receives an average of more than thirty complaints and 'issues of concern' each week regarding unsafe practice associated with treatments, medicines and the supply of aesthetic products and the training standards and qualifications that many practitioners present with.

The JCCP aims to protect the public by:

- Applying strict standards for entry to the JCCP Register.
- Only approving education and training providers that deliver programmes that meet the standards.
- Maintaining a register of individuals who successfully complete those programmes and accreditation procedures.
- Seeking to ensure that only safe and ethically sourced products, devices and medicines are used in the administration of aesthetic treatments.
- Taking action if the standards are not met.
- Establishing clear and simple procedures to enable the public to raise issues of concern about the professional practice of registrants.
- Providing simple and easily accessible information to the public about non-surgical aesthetic treatments.

Key people

The JCCP has established a Board of Trustees under the Chairmanship of Professor David Sines, CBE. Professor Sines chaired the Health Education England stakeholder consultation following the 2013 Keogh Review into patient safety. He has been Chair of the JCCP Board of Trustees since January 2016. Professor Mary Lovegrove OBE is Chair of the JCCP Education and Training Committee and Andrew Rankin is Chair of the Practitioner Register Committee. Dr. Martyn King is the Council's Vice Chair and Dr. Paul Charlson, along with Andrew Rankin, co-chairs the JCCP's Clinical Advisory Group. Sally Taber leads the Council's Complaints Team. John Underwood chairs the Council's Marketing and Communications Committee and Kirsty Benn-Harris chairs the JCCP Policy, Resources and IT Committee. Our patient and lay advocate is Dawn Knight. All are Trustees of the JCCP.

The CPSA chairperson is Mr. Alex Woollard. He is supported by the following Trustees: Dr. Tamara Griffiths, representing the British Association of Dermatologists; Mr. Simon Withey, Representing the British Association of Aesthetic Plastic Surgeons; Mr. Ahmed Ali-Khan, representing the British Association of Plastic, Reconstructive and Aesthetic Surgeons (BAPRAS); Mr. Alexander Armstrong, a Plastic Surgery Consultant as an Ex-Officio Trustee; Leslie Ash as 'Patient and Public' representation and Mr. Mark Mikhail, a Plastic Surgery Registrar and CPSA Secretary.