



## Press Release 45- Joint Council for Cosmetic Practitioners (JCCP) – Publication on Revised and Updated Guidance for Responsible Prescribing for Cosmetic Practitioners

The Joint Council for Cosmetic Practitioners (JCCP) was established and launched formally at the House of Lords 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 non-surgical treatments in England. The HEE standards were transferred to the JCCP by HEE in June, 2018. The JCCP is a 'not for profit' UK charitable body charged with the responsibility of voluntary 'self-regulation' of the non-surgical aesthetic sector in the four UK countries. The JCCP places public protection and patient safety as the focus of its activities'. The JCCP and the CPSA regard safe prescribing practice to be an essential component of public protection.

The recent aesthetic sector licencing amendment contained within the Health and Care Act (2022) and the enactment of the Botulinum Toxins and Cosmetic Fillers (Children) Act (2021) have caused prescribing in cosmetic procedures to come under close scrutiny. Discussions in both Houses of the Lords and Commons have been openly critical with regard to standards of prescribing for cosmetic procedures, presenting clear implications for professional and industry credibility and for patient safety.

Competence to prescribe is founded on an individual's professional qualification, advanced knowledge and their self-declared ability to work within their area of competence and expertise. This is a mechanism that has proven to be particularly effective where practitioners work within a system of oversight. In most circumstances, prescribers work closely with their peers whilst benefiting from national and/or local guidance and standards with which they must all comply. This combination of competence, professional regulatory control and guidance and local working guidance and standards, combined with the oversight of peer working provides a robust mechanism for patient safety and for enforcement and remediation when errors occur.

By contrast, the cosmetic sector is unusual in that prescribers usually work independently and without immediate oversight, frequently compounded by the commercial environment in which they work. Under these conditions there is a tendency for transparency of practice to be opaque, making enforcement by professional regulators and others more difficult.

This guidance document is prepared with this lack of oversight and local guidance in mind, but also with the understanding that the Government's new proposed licensing regime may act as a vehicle to close that gap and enhance regulatory compliance. The guidance presented in this paper concerns all non-surgical cosmetic procedures that are either cosmetic, medical or medically related in nature.



In line with several Professional Statutory Regulators (the General Medical Council and the General Dental Council and in accordance with guidance set down by the Royal Pharmaceutical Society) the JCCP and the CPSA have set down their decision not to endorse or permit the remote prescribing of any prescription medicine when used for **specifically** for non-surgical cosmetic treatments. In such circumstances when a prescriber delegates treatment to other practitioners, then the JCCP would remind the prescriber that the patient remains under the oversight of the prescriber, requiring that the prescriber must be familiar with the patient through an initial face to face consultation and diagnostic assessment of the patient's suitability for treatment. This applies to the routine/planned administration of medicines that are used specifically for cosmetic purposes, such as botulinum toxins, injected local anaesthetic or topical adrenaline, and the emergency use of medicines such as hyaluronidase.

Furthermore, the JCCP would advise that whenever a designated Prescriber prescribes medicines or treatments, they must exercise their professional and clinical judgement, have adequate knowledge of the patient's physical and psychological health status and be satisfied the medication serves the person's needs. This applies to all medicines used specifically for cosmetic purposes that are 'Prescription Only Medicines' (POM) whether they be injectable, topical or oral.

The JCCP does not therefore endorse or permit the use of remote prescribing of injectable, topical or oral prescription medication for non-surgical cosmetic treatments in any circumstances. Examples of this include the off-label use of adrenaline when applied topically, to enhance pain control and limit bleeding. The JCCP reminds all prescribers of the need to carry out a physical examination of patients before prescribing injectable prescription only cosmetic medicines. The JCCP advises that prescribers should not therefore prescribe such medicines by telephone, video link, online or at the request of others for patients whom they have not examined personally.

The JCCP recognises the important role that technology will play increasingly in the effective and efficient delivery of effective and productive prescribing and is cognisant of the need to ensure that the JCCP and the Professional Statutory Healthcare Regulators work together (wherever possible) to make sure that our approaches to regulation do not become barriers to innovation.

The JCCP has shared this statement with the General Medical Council, the General Dental Council, the Nursing and Midwifery Council, the General Pharmaceutical Council, The Royal Pharmaceutical Society and with the MHRA prior to publication. The Royal Pharmaceutical Society has also advised that *'In our view as the professional body for pharmacy, the JCCP statement is consistent with the approach of the professional regulators and will be useful for the RPS to signpost to'*.

**The revised JCCP Statement on 'Responsible Prescribing for Cosmetic Procedures' can be viewed on the JCCP website at:**



<https://www.jccp.org.uk/NewsEvent/jccp-guidance-statement-responsible-prescribing-for-cosmetic-procedures>

Professor David Sines CBE – Executive Chair of the JCCP said,

“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) continue to strive 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 JCCP’s primary purpose is to raise public awareness and improve patient safety. The publication of our revised guidance on ‘Responsible Prescribing for Cosmetic Practitioners’ demonstrates our continuing commitment to signposting and promoting safe and effective practice within the aesthetic sector. We have worked closely with a range of statutory regulators and professional associations over the past three years to promote safe and effective practice in prescribing. We commend the adoption and application of this revised Guidance Statement in accordance with our shared aim of protecting the public”.

Andrew Rankin – JCCP Trustee and Co-Chair of the JCCP Clinical Advisory Group said,

“The JCCP Clinical Advisory Group welcomes this guidance as contemporaneous with the evolving cosmetic sector. In an industry known for a level of innovation that pushes the boundaries of cosmetic practice, this guidance clearly states the limits within which this innovation must proceed if it is to remain safe and legal. It represents a valuable guidance for prescribers, for those to whom they delegate and for anyone with an interest in this important area of work”.

Dr John Curran - Chair of the Regulatory, Standards and Ethics Committee, British College of Aesthetic Medicine said,

“I am delighted to have been asked to contribute to, and welcome, this essential work on prescribing guidance by the JCCP. All prescribers have a clear ethical and professional responsibility to apply these standards, which have been shared with our professional regulators, and formulated primarily to safeguard those seeking aesthetic medical treatments”.

Sharon Bennett - Chair of the British Association of Cosmetic Nurses said,

“The BACN are delighted to support this detailed JCCP guidance document. It outlines the responsibilities required in prescribing lawfully, safely and competently in the medical aesthetic sector at a much-needed time”.



**-Ends-**

**Notes to Editors:**

For general information and enquiries on the JCCP go to:

[www.iccp.org.uk](http://www.iccp.org.uk)

For further information on standards for non-surgical aesthetic treatments and hair restoration surgery please go to:

[www.cosmeticstandards.org.uk](http://www.cosmeticstandards.org.uk)