



Adjunctive and orphan treatments.

Policy Statement - Requirements for JCCP registrants performing unregistered treatments.

Introduction and Scope

The JCCP confirms entry to the Practitioner Register in accordance with the evidence that applicant's provide with regard to their competence and practice proficiency against JCCP and CPSA (The Cosmetic Practice Standards Authority) published standards, for five different treatment modalities¹. However, the Council understand that some Registrants may also perform treatments that fall outside the scope of these five recognised modalities. Such additional procedures may be "adjunctive" i.e. they may be complementary to the primary treatment/procedure or they may be stand-alone, or "orphan/emergent" treatments.

JCCP registrants have a duty to 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 that they apply. For the avoidance of doubt, this statement on adjunctive therapies is intended to cover **all** patient/client interventions that are supplementary to the 5 registered modalities noted in the footnote below.

It is important to understand that adjunctive and orphan treatments are not 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 as such is unable to accept or endorse evidence of practitioner competence to perform such treatments safely or effectively. JCCP Registrants should not therefore suggest or imply to their clients/patients that the adjunctive 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. Neither should Registrants imply endorsement by the JCCP of such adjunctive treatments in any form of advertising that they might use to promote their services to members of the public.

This statement applies to all Registrants on both Parts of the JCCP Practitioner Register. This statement also sets down the requirements that the JCCP would expect of all of its Registrant with regard to safe, ethical and responsible practice. The Council acknowledges that both those modalities/procedures that it currently recognises, alongside any adjunctive treatments that Registrants might elect to provide, combine to represent an individual's overall scope of practice.

"The scope of your practice is a way of describing what you are trained and competent to do. It describes the areas in which you have the knowledge, skills and experience to practise safely and effectively in the best interests of patients". (GDC 2015)

The JCCP reserves the right to further develop standards in association with the CPSA for new and emergent orphan and adjunctive treatments, and to enquire of its members the nature of such treatments, the standards that should be applied to protect the public and to request evidence where required that Registrants are practising competently and safely.

¹ Hair Restoration Surgery; Injectable Toxins; Dermal Fillers; Lasers and Light and Skin Rejuvenation (Micro-Needling and Chemical peels).

Applicable Standards

You must be familiar with the CPSA overarching principles, the JCCP Competency Framework (2018) and the JCCP published Code of Practice. You must apply these in **all** areas of your practice and in addition demonstrate compliance with:

Lawful Standards of Practice

The JCCP requires you to declare that you practise ethically and lawfully at all times. This must apply to all aspects of **all** treatments you perform; you must make yourself aware of legal requirements specific to any orphan and adjunctive treatments that you might use in your everyday practice. Where your role requires you to prescribe for these treatments, you must refer to the JCCP prescribing guidance on 'Responsible Prescribing Practice'.

Premises Standards

As a JCCP registrant you must ensure that your premises are safe and that they meet the requirements against the published JCCP checklist for both generic and specialist areas of procedural practice. Adjunctive or orphan treatments must take place within the premises to which these standards apply and further, you must make any additional arrangements and adjustments necessary to ensure that you practise within your defined scope of practice. You must also comply with any legal requirements for registration, including CQC in England or, in Scotland, HIS.

Supervision Requirements

The JCCP and the CPSA do not set down specific supervision requirements for orphan and adjunctive treatments. However, it is a requirement that all practitioners have access to some form of supervision. For orphan and adjunctive treatments, the JCCP expect Registrants to assess risk, including the requirement to intervene safely and effectively in the event of an adverse incident, and apply supervision standards accordingly, with the aim of maintaining patient safety and public protection. This is particularly important if you are not a registered healthcare prescriber or you have limited experience in any defined area of practice.

CPD Requirements

The JCCP requires you to be up to date in your practise through continuous professional development. A *minimum* of 50 hours CPD per year is required and this should include orphan and adjunctive treatments (if you are performing such procedures as part of your practice), in addition to those modalities/treatments for which you are registered to deliver by the JCCP and must be reflected in your personal development/CPD requirements. It is part of the JCCP's responsibility to seek evidence that Registrants meet these requirements by undertaking an annual sample of Registrant compliance with the Council's CPD standards and procedures. The JCCP regards CPD to be essential to ensure that Registrants are able to evidence the fact that they are appropriately trained and proficient to perform **any** treatment that they provide to members of the public (including any adjunctive treatment that they might elect to perform). CPD also provides evidence that the Registrant has reflected on their practice and that learning from their CPD has taken place.

Safe Products

All Registrants are responsible for ensuring that the products they use for orphan and adjunctive treatments are appropriately and ethically sourced and licensed (where appropriate).

Insurance

All Registrants must ensure that they possess current and up to date indemnity insurance to cover **all** treatments performed within the context of their scope of practice.

Training

The JCCP does not accept non-JCCP approved education training qualifications as evidence of competence. In these situations, it is the Registrant's responsibility to assess the extent to which any non-JCCP approved education and training undertaken meets the Registrant's requirements to demonstrate their competence, capability and accountability to enable them to practise safely, responsibly and effectively.

5th November 2019

FREQUENTLY ASKED QUESTIONS and RESPONSES

- Q: What would JCCP do if a concern was received from a member of the public who had received an adjunctive therapy in the field of aesthetics? (e.g. 'Cryotherapy Treatments for any JCCP Registrant):

R: The JCCP recognises the legal right of its Registrants to practise procedures that fall outwith the recognised scope of JCCP registration for such activities. The JCCP would however seek to share the complaint with the Registrant and request them to respond to the complaint prior to determining if the complaint justified referral to the JCCP's Fitness to Practice Panel for investigation. Whilst the JCCP does not set practice standards for adjunctive/orphan treatments it does expect its Registrants to comply with the principles of safe practice that are published in the JCCP Code of Practice and which are summarised in the JCCP's 'Adjunctive Therapies Policy Statement'. Furthermore, should a Registrant knowingly advise a member of the public that they are 'registered by the JCCP' to implement any procedure for which they are not registered with the Council to perform, then the JCCP will immediately evoke the Council's Fitness to Practise procedure and seek to investigate the complaint.

- Q: What would JCCP do if a concern was received from a member of the public that a Part B Registered (Non Registered Healthcare) Practitioner had performed a procedure (such as injecting a toxin or inserting a dermal filler) that fell outwith their JCCP recognised scope of practice?

R: The JCCP recognises the legal right of Part B Registrants to practise procedures that fall outwith the recognised scope of JCCP registration for such activities. Under such circumstances the JCCP would seek to share the complaint with the Registrant and request them to respond to the complaint prior to determining if the complaint justified referral to the JCCP's Fitness to Practice Panel for investigation. The JCCP expects all of its Registrants to comply with the principles of safe practice that are published in the JCCP Code of Practice. Furthermore, should a Registrant knowingly advise a member of the public that they are 'registered by the JCCP' to implement any procedure for which they are not registered with the Council to perform, then the JCCP will immediately evoke the Council's Fitness to Practise procedure and seek to investigate the complaint.

- Q: What would JCCP do if a concern was received from a client who had received an adjunctive therapy in an unrelated field (e.g. Massage, Acupuncture, Psychotherapy)?

R: Under such circumstances the JCCP would seek to share the complaint with the Registrant and request them to respond to the complaint prior to determining if further action is required in accordance with its published complaints procedures. The JCCP expects all of its Registrants to comply with the principles of safe practice that are published in the JCCP Code of Practice. In the case of a registered health care professional the JCCP will refer the complaint to the relevant Professional Statutory Regulator (e.g. the GMC, GDC, NMC, GPhC or HCPC) in accordance with published agreements with these professional healthcare regulators. Should the Complaint be against a JCCP registered non-healthcare professional then the JCCP will advise the Complainant of other organisations to whom they might refer the matter (e.g. other PSA Accredited Voluntary Registers; the CQC; Local Authority Environmental Health Officers; the MHRA etc).

JCCP November 7th 2019