

Botulism

The Invisible Risk Behind Unregulated
Botulinum Toxin (Botox Like)
Treatments

By Julie Scott RGN NIP

Introduction

Between 4 June and 14 July 2025, the UK Health Security Agency (UKHSA) confirmed 38 cases of iatrogenic botulism in England, which were traced to unlicensed or counterfeit botulinum toxin injections in nonclinical settings^{1,2}. As the Joint Council for Cosmetic Practitioners (JCCP), British College of Aesthetic Medicine (BCAM), British Association of Medical Aesthetic Nurses (BAMAN) and Save Face warn, only licensed products, qualified practitioners, and accredited clinics can keep you safe.

What Is Botulism - And Why You Should Care

Botulism is a rare but potentially life threatening condition caused by toxins produced by *Clostridium botulinum*. When these toxins spread systemically, they can paralyse muscles critical for breathing and swallowing. Symptoms can emerge after 1-day or even up to four weeks after your treatment, and complications can include drooping eyelids, blurred or double vision, slurred speech, difficulty swallowing, and breathing problems^{2,3}. Six patients from the recent cluster had respiratory issues that required immediate critical care.

How Unregulated Toxin products Endanger You

- Counterfeit Toxins Bypass Safety Checks: Unregulated products often lack MHRA testing and may carry dangerous levels of active toxin or contaminants⁴.
- Non-Clinical Settings Lack Sterility Protocols: Beauty salons or private homes rarely have the same infection control measures as an accredited clinic.
- Unqualified Practitioners Misjudge Dosage & Anatomy: Without proper professional training, injectors risk spreading toxin beyond the intended target, causing systemic paralysis¹.

The JCCP's Role: Raising the Bar for Safety

The Joint Council for Cosmetic Practitioners (JCCP) champions higher standards across the nonsurgical aesthetic sector:

1. Mandatory Licensing Advocacy
2. National Training Standards
3. A Robust Code of Practice
4. Consumer Awareness Campaigns

By encouraging licensing of both practitioners and premises, the JCCP ensures clinics meet hygiene and safety benchmarks, and that you know exactly what to look for.

How to Stay Safe: A 4-Step Toxin Safety Checklist

Before Your Appointment

- Research clinic reviews and accreditation on PSA accredited registers - such as the JCCP and Save Face – See links below.
- Verify your practitioner's registration with regulatory bodies - Including the GMC, NMC, GDC, GPhC - See links below.
- Check the practitioner's qualifications and the years of experience they have.
- Ask to see their complications management protocols and affiliations – Complications bodies such as CMAC and ACE – See links below.
- Ensure the practitioner is fully insured and regulated.
- Insist on a face-to-face consultation with a qualified prescriber for every botulinum toxin treatment.

During Your Consultation

- Provide full medical history; carefully review and sign the consent form.
- Discuss realistic expectations, treatment duration, and all potential complications.
- Ensure “before & after” photographs are taken.

Treatment Safety

- Practitioners must wear new gloves and use sterile needles & syringes for every treatment.
- Ensure the treatment is undertaken in a sterile (aseptic), clean clinical environment.
- The injection area should be cleaned prior to any injection
- Inspect the unopened vial—record brand name, batch/LOT number, and expiry date.
- Confirm it's an MHRA licensed products (crosscheck on the MHRA website if necessary), approved products include:
 - Azzalure®/ Dysport®
 - Bocouture®/Xeomin®
 - Botox®/Vistabel®
 - Letybo®
 - Nuceiva®/Jeuveau®
 - Relfydess®/Alluzience®

- After the treatment, cleanse the area and apply an aseptic barrier spray such as OpSite® or Dermaseal®, to protect the site from infection.

Aftercare Support

- Obtain written aftercare instructions with clear emergency contact details.
- Schedule any recommended follow up appointments.
- Watch for warning signs for up to four weeks post treatment, such as drooping eyelids, blurred/double vision, slurred speech, difficulty swallowing or breathing, muscle weakness, and seek urgent care if any occur.

Product Safety: What You Need to Know

Safety starts with the product itself. Before any injection, run through this quick checklist:

Inspect the Vial & Packaging

- Ask to see the sealed carton and vial with the original labelling.
- Note the brand, batch/LOT number, and expiry date, maybe take a photo.

Verify MHRA Licensing

- Confirm the exact product name and licence number.
- Crosscheck on the MHRA “Licensed Products Directory” to ensure its authorised for cosmetic use.

Request the Patient Information Leaflet

- Read the manufacturer’s leaflet on storage, reconstitution and dosing.
- Make sure the practitioner follows those instructions exactly.

Avoid Online or Informal Purchases

- Never buy via social media, auction sites or overseas pharmacies.
- Botox® is a prescription only medication and should never be advertised or promoted in anyway.
- Legitimate clinics source directly from UK licensed pharmacies.

Beware of “Too Good to Be True” Deals

- Genuine products with full safety data aren’t cheap.
- If the price is drastically lower than standard clinic rates, walk away.

Never Self Inject

- Home injections have a high risk of contamination and complications.

Know How to Report Problems

- If you suspect a counterfeit or have an adverse reaction, check your practitioner reports it via the MHRA Yellow Card Scheme (yellowcard.mhra.gov.uk).

Important Questions: What to Ask Your Practitioner

1. "Can I inspect the vial?" – Check the seal and note brand, batch & expiry.
2. "What is the batch (LOT) number?" – Record or snap a quick photo.
3. "Is this MHRA licensed?" – Ask for the product name and verify online.
4. "Who prescribed and supplied my toxin?" – Confirm a qualified prescriber is responsible – Remember only a Dr, Dentist, Prescribing Nurse or Pharmacist can.
5. "Where was it sourced from?" – Ensure it came from a UK licensed wholesaler or manufacturer.
6. "Can you walk me through the consent form?" – Make sure all risks are explained in clearly both verbally and in writing.
7. "What sterility protocols do you follow?" – Look for new gloves, needles & antiseptic prep each time.
8. "What follow up plan do you recommend?" – Ask when to return, what to watch for, and who to call.

By turning the consultation into a dialogue, you take control of your safety.

Warning Signs: Act Fast to Stay Safe

If, after your treatment, you experience any of the following, contact NHS 111 or attend A&E immediately - Remember this could be life-threatening and can occur anytime, even up to 4 weeks after treatment:

- Drooping eyelids or facial weakness
- Blurred or double vision
- Slurred speech
- Difficulty swallowing or breathing
- General muscle weakness or paralysis⁵

Treatment & Care: What to Expect if Botulism Occurs

If you develop symptoms of botulism after a cosmetic injection, prompt medical care is vital. Here's how treatment typically unfolds:

Urgent Assessment & Hospital Admission ⁵

- Call NHS 111 or go to A&E immediately.
- Tell staff you've had a botulinum-toxin cosmetic procedure so they can prioritise appropriate testing and care.

Antitoxin Administration ⁶

- In hospital, you may receive an equine-derived botulinum antitoxin, ideally within 24–48 hours of symptom onset.
- The antitoxin neutralises circulating toxin, preventing further paralysis (but cannot reverse paralysis already in place).

Supportive Care & Monitoring ⁶

- Continuous monitoring of breathing, heart rate, and blood pressure.
- Intubation and mechanical ventilation if you develop breathing difficulties or respiratory muscle weakness.
- IV fluids, nutrition, and physical support as needed while you recover.

Recovery & Follow-Up ⁶

- Paralysis from botulism can take weeks to months to fully resolve.
- You may need physiotherapy or speech therapy for lingering muscle weakness.
- Arrange follow-up appointments with your GP or neurologist to monitor progress.

Reporting & Support

- [Report the case through the UKHSA for public-health tracking.](#)
- Contact your practitioner's insurer or professional body incident management.
- [Raise a Patient incident report to the JCCP](#)

Key Point: With timely antitoxin and modern intensive care, most patients survive and make a full recovery, so acting fast can make all the difference.

Further Information and Resources

Accredited Professionals Checks:

- **JCCP Practitioner Register:** <https://www.jccp.org.uk/MemberSearch>
- **Save Face Register:** <https://www.saveface.co.uk/en/search>
- **CQC Register:** <https://www.cqc.org.uk/search/all>
- **GMC:** <https://www.gmc-uk.org/registration-and-licensing/our-registers>
- **GDC:** <https://olr.gdc-uk.org/searchregister>
- **NMC:** <https://www.nmc.org.uk/registration/search-the-register/>
- **BCAM:** <https://bcam.ac.uk/patients/clinicians/>
- **BAMAN:** <https://www.baman.org.uk/practitioner-finder/>
- **GPC:** <https://www.pharmacyregulation.org/register/pharmacist>

Complications Management Affiliations:

- **CMAC:** <https://www.cmac.world/clinic-finder/>
- **ACE:** <https://uk.acegroup.online/map/>

Regulatory & Patient Guidance:

- **MHRA Licensed Products Directory: Verify product legality**
<https://products.mhra.gov.uk/search/>
- **NHS.uk Cosmetic Procedures Guidance: Official patient advice**
<https://www.nhs.uk/tests-and-treatments/cosmetic-procedures/advice/choosing-who-will-do-your-procedure/>

Key Takeaway: Empower Yourself

Your health and appearance deserve the highest standard of care. By asking the right questions, verifying credentials, and following this straightforward guide, you ensure that a treatment doesn't come at the expense of your wellbeing. Stay informed...stay safe!

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She is an aesthetic mentor and international speaker, who has won the Aesthetics Awards 'Aesthetic Nurse Practitioner of the Year' in both 2022 & 2024, and 'Best Clinic South of England' 2023 awards.

She also sits on the Aesthetics Reviewing Panel for the Aesthetics Journal, is a Board member for DANAI, a Faculty Member of Allergan Medical Institute and an Ambassador and KOL for the JCCP and several leading aesthetic brands.

References

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