

Joint Council for Cosmetic Practitioners

General principles for the Provision of Safe and Effective CPD for Cosmetic Practitioners

Any practitioner who undertakes non-surgical cosmetic procedures should be mandated to provide evidence that they possess the requisite skills, knowledge, competence, confidence and capability to practise both safely and effectively for each and all of the procedures that they provide. This will require all cosmetic practitioners to engage in ongoing CPD activities on an annual basis that are appropriate and proportionate to the risks involved in their practice. The JCCP purports that for CPD to be meaningful it should be associated with reflective practice undertaken by practitioners and supported by evidence of how their learning experience has resulted in an improvement to both patient safety and to their practice overall. We recognise that this will require a significant culture change across the non-surgical cosmetic sector, but we remain committed to emphasising the importance of a new standardised approach to CPD being formulated and adopted in the interests of public protection.

The JCCP considers that engagement in appropriately regulated CPD activities should be mandated for all non-surgical cosmetic procedures (particularly those more invasive procedures involving the use, or injection of botulinum toxins, temporary or permanent dermal fillers and hair restoration surgery etc.). The JCCP affirms that the provision of any new legally determined scheme of licensing for non-surgical cosmetic practice should mandate that only those practitioners who are able to provide robust evidence that they meet (yet to be determined) national standards for CPD should be eligible to receive a practitioner license at both the point of application and at the point of renewal. This is required to provide evidence that the practitioner practises legally, safely, and effectively.

The JCCP's CPD Task and Finish Group

The JCCP established a CPD task and finish group in the Spring of 2024 with the aim of making recommendations to both the JCCP Education and Training Committee and to the JCCP Practitioner Register Committee regarding proposed CPD requirements for both JCCP Registrants and non-JCCP registered practitioners and to determine standards of best practice for the regulation and delivery of CPD activities as adjunctive components of the Governments' proposed new scheme of regulation/licensing for non-surgical cosmetic practice in England and Scotland. The membership of the JCCP's Task and Finish group is presented at Appendix 1.

The Task and Finish Group also acknowledged the nature of the currently unregulated and non-standardised 'CPD provider sector' and set out to consider how best to make proposals to better regulate CPD activities delivered by various and diverse training providers i.e., those who are supplying CPD activities for practitioners.

The CPD Task and Finish Group agreed the following:

Objectives

- To determine and ensure a consistent understanding of professional standards for continuous learning
- To agree and promote a clear definition of what constitutes 'good CPD' and appropriate learning activities.
- Make proposals for ongoing standardisation and quality assurance of approved CPD activities.
- Ensure that the UK and Scottish Governments set down a requirement for all Licensed Non-Surgical Cosmetic Practitioners to evidence how their knowledge and practice remains up to date, relevant and updated in line with industry changes.

The JCCP's Proposed Definition of CPD

“Continuing Professional Development (CPD) is the proactive process of enhancing the knowledge, skills and personal attributes for previously qualified non-surgical cosmetic professionals to ensure they perform their roles effectively and safely. It demonstrates a commitment to maintaining competence and, when combined with ongoing assessment, it helps ensure they remain competent, current and capable of meeting changing professional standards throughout their career. CPD is invaluable to ensure continuous growth, maintaining expertise and pushes the industry to new standards “

Key Accepted Principles of CPD

- A benchmark of quality learning
- A cornerstone of professionalism
- Underpins and maintains the currency of qualifications
- Must be forward facing and strive for continuous improvement
- Ensures professionals practice ethically.
- Ensures professionals are fit for practice
- Highlights safety as a key principle for non-surgical cosmetic practice

Not all CPD is required to be formally accredited. Annual CPD should include a variety of learning activities - formal learning, workplace learning, reflection, self-directed learning etc. See ACCA guidance and examples:

- <https://www.accaglobal.com/gb/en/member/cpd/your-guide-to-cpd/cpd-what-you-need-to-do.html>
- <https://www.accaglobal.com/gb/en/member/cpd/your-guide-to-cpd/plan-do-review/do.html>

A framework or specification outlining key areas that CPD should cover e.g. key topics or competencies. See Engineering Council UK Specification as an example:

- <https://www.engc.org.uk/standards-guidance/standards/uk-spec/>

In the wider sense, CPD is not an activity that occurs in isolation. For instance, it forms a critical part of assessment through revalidation and appraisal for nurses and doctors. This is a key point for consideration for unregulated practitioners as part of licensing, with reference to the allocation of a regulated supervisor to oversee any form of ‘invasive’ non-surgical cosmetic procedure that they might perform.

Conversely the JCCP advises that CPD is not:

- A formal qualification or evidence in itself of a measure of competence
- A course or diploma that is strictly undertaken for insurance purposes
- A substitute for a qualification
- Purely ‘advanced learning’ and not ‘basic subjects’ - CPD can be at any level e.g. washing hands for patient safety.

The purpose of accredited short courses

In support of the above section the JCCP's Education and Training Committee has already advised (JCCP, 2022)¹ that 'Short courses which are *accredited for continuing professional and personal development (CPD)* and offer CPD points should not be regarded to equate to formally approved initial training courses. It is important to understand the difference between formally approved initial training and Continued Professional Development (CPD). CPD should be delivered to those with prior demonstrable qualifications and experience in the applied area for which they are seeking to undertake CPD short courses. CPD courses should be designed to enhance, refresh and update knowledge and skills throughout a person's working life and are unsuitable for those with no prior experience and initial training in the field of non-surgical cosmetic practice holding of a CPD Certificate is intended to enhance competence, not to replace formally approved initial qualifications. Persons offering CPD must themselves be appropriately qualified and competent'.

The JCCP also acknowledges the important role that national and global Pharma Company Training Academies play in ensuring practitioner knowledge and practice competence is up to date and aligned with new product/medicine development within the non-surgical cosmetic sector. These organisations operate in a regulatory environment that is responsive to risk and are ideally situated to ensure that CPD reflects prevailing knowledge that mitigates risk in a rapidly evolving sector.

The JCCP's Proposals for the Effective and Safe Delivery Continuing Professional Development

The JCCP's CPD Task and Finish group recommend that there is a requirement to clearly define the parameters and standards expected of those delivering and regulating CPD training activities and acknowledges that robust and standardised processes are required to be implemented to monitor these in the future.

The JCCP has worked with the CPD Standards Office, an accreditation and research service established within the 'Professional Development Consortium' who have advised that 'Continuous learning beyond formal qualifications is a cornerstone across all sectors and professions'.

The JCCP has also worked historically with another CPD accreditation organisation, CPD Certification Service Ltd. to endorse the following statements of principle of best practice that they have published to 'ensure we are not inadvertently being seen to condone poor practice or place anyone in danger' (*CPD Certification Service Guide for Invasive Treatment Submissions, 2020 - Copyright - The CPD Certification Service Limited; Reference 2020 11*). The JCCP supports fully the following principles included in their position paper/advisory statement:

'It is important to understand the difference between basic training and Continued Professional Development (CPD). CPD should be delivered to those with prior demonstrable qualifications and experience in the applied area for which they are seeking to undertake CPD training. CPD exists to enhance skills throughout a person's working life and may well be unsuitable for those with no prior experience in a subject. The holding of a CPD Certificate is intended to enhance competence, not replace initial/primary qualifications'. 'Persons offering CPD must themselves be appropriately qualified and competent. We expect to see trainer CV's and qualifications as part of the material submission we assess'.

'Course materials should refer to the regulatory framework approved by the PSA (Professional Standards Authority) who authorise the JCCP (Joint Council for Cosmetic Practitioners) and Save Face particularly where invasive treatments under their definition of the term are being delivered'. Please look at: <https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%20Competency%20Framework%20final%20V8%20September%202018.pdf>.

¹ JCCP (2022) Good Practice Guide for Education and Training Providers.

The Task and Finish Group also considered the question '*What good systems of regulation might look like*' and advised that 'good schemes' should include the following:

- All practitioners should be required to hold and regularly update a personal CPD plan that is relevant to their personal development and professional practice.
- Utilise a Centralised CPD Record/Portfolio. Create a centralised digital register for non-surgical cosmetic practitioners to log their activities. This would be accessible to regulatory bodies and could be used to track compliance and measure practitioner growth.
- Self - Reflection and Reporting : practitioners should submit annual CPD reports, reflecting on their learning outcomes and indicating how these have improved practice.
- Link CPD compliance to licensing. Practitioners who do not meet their CPD requirements could face restrictions to practice as well as suspension of their license
- Encourage collaboration with Clinical Experts : Encourage interdisciplinary CPD programmes that involve experts e.g., from dermatology, plastic surgery, psychology and nursing etc.
- CPD programme offers should align fully to the principles that will underpin the new scheme for non-surgical cosmetic regulation/licensing in England and Scotland.
- Should be subject to an agreed annual audit process for CPD records

Identifying and Agreeing a Core Mandatory CPD Learning Portfolio/Skill Set for Non-Surgical Cosmetic Practice

The Task and Finish Group has reached the conclusion that with the advent of a new scheme of licensing for non-surgical cosmetic practice in England and Scotland that it will be necessary to identify a range of specified mandatory annual CPD learning events to ensure public safety. These might include (but are not limited to):

- Infection control (aseptic technique) and health protection
- Basic Life Support
- Safeguarding
- Consent
- Complications management (e.g. anaphylaxis) and the safe and effective management of emergencies
- Raising issues of concern and complaints management (including the use of the MHRA 'Yellow Card Scheme')
- Communication skills
- Information governance
- Record keeping
- Supervisory requirements
- Reporting arrangements for adverse events (e.g., the MHRA 'Yellow Card' scheme).

These 'touch points' or 'safety points' should be consulted upon nationally and a mandatory list of required annual standardised CPD learning events agreed and implemented as part of the proposed scheme of regulation/licensing for non-surgical cosmetic practitioners.

In addition, the JCCP Task and Finish Group recommended that all practitioners should undertake a minimum of 35 hours of continuing professional development (CPD) relevant to their scope of non-surgical cosmetic practice during any three-year period.

The JCCP would caution however against over-complicating the imposition of a mandatory system of CPD for relevantly qualified regulated healthcare practitioners who have already provided contemporaneous evidence of compliance to these mandated 'CPD training' requirements as either part of their public duty as NHS employees or through their revalidation and/or appraisal with their statutory regulators.

Key issues to for further consideration are the need to:

- Agree and promote a clear definition of what constitutes 'good CPD' and appropriate 'procedural-related' learning activities.
- Identify the minimum standards of CPD provision, practice and outcome measurement to ensure with compliance with the new non-surgical cosmetic regulatory scheme/license in England and Scotland.
- Develop systems to ensure the standards remain relevant and are updated in line with industry changes.
- Determine and ensure a consistent understanding of professional standards for continuous learning.
- Implement arrangements for ongoing standardisation and quality assurance of approved CPD activities.
- Recognise the significance that the possession of a robust and validated CPD portfolio will have for future insurance provision, renewal and indemnity cover.
- Utilise established CPD protocols associated with regulated healthcare professionals, adapting them to capture unregulated individuals, for instance as part of supervision and periodic assessment by a regulated supervisor.
- Require the UK and Scottish Governments to determine a robust and standardised process and system of CPD audit to be applied by Local Authorities when practitioners seek to renew their non-surgical cosmetic practitioner license (i.e., to provide objective and measurable evidence that they have undertaken and engaged in procedure relevant and appropriate annual continuing professional development training and experience to perform the non-surgical cosmetic activity safely and effectively.
- Determine sanctions for non-adherence.

Professor David Sines CBE – Executive Chair and Registrar JCCP

With grateful thanks to Amanda Rosewarne, CEO and Co-Founder of the CPD Standards Office at Amanda.rosewarne@cpdstandards.com.

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Appendix One

Members of the JCCP CPD Task and Finish Group

Amanda Rosewarne – Chief Executive – The CPD Standards office

Professor Mary Lovegrove OBE – Chair JCCP Education and Training Committee

Andrew Rankin - Chair JCCP Practitioner Register Committee

Professor David Sines CBE - Executive Chair and Registrar JCCP

Lesley Blair – Chief Executive BABTAC and CIBTAC

Jackie Gibson – Independent Aesthetic Practitioner

Tim Frome – Head of Government Schemes, Hamilton Fraser Insurance

Debra Morris – Head of Programmes, VTCT and Member of the JCCP Education and Training Committee

Yvonne Senior – Independent Practitioner and Trainer and Member of the JCCP Education and Training Committee