

# **MAKING A COMPLAINT OR RAISING AN ISSUE OF CONCERN**

2023/24 Complaints Policy v 1.2

### **Raising a concern about a practitioner**

If you are a member of the public, then please click [here](#) to complete our form and you will receive an acknowledgment.

If you are someone who works (or has worked) in the non-surgical cosmetic or hair restoration surgery sector, then please click [here](#) to complete our form and you will receive an acknowledgment.

### **Raising a concern about an Education/Training Provider or course**

To raise a concern, please email [complaints@jccp.org.uk](mailto:complaints@jccp.org.uk) and you will receive an acknowledgment.

### **Raising a concern about the JCCP**

To raise a concern, please email [complaints@jccp.org.uk](mailto:complaints@jccp.org.uk) and you will receive an acknowledgment.



## Guidance

It is often stressful to raise a concern or to complain - this guidance is designed to help you present your issue of concern .

We at JCCP assess and monitor regulated aesthetic practitioners who offer non-surgical aesthetic treatments to ensure they are appropriately qualified, experienced and trained to practise safely. Regulated Aesthetic practitioners who are accepted onto the JCCP Register (called Registrants) agree to respect and to practice in accordance with the JCCP/CPSA Code of Practice. The Code of Practice is focussed on patient safety and public protection. The needs of patients/clients are the Council's first priority. Both the JCCP and our Registrants are required to be open about what they do and have a duty of candour to respect and respond candidly to your concerns. If you believe you have not been well treated, it is best that you say so. In that way the problem can be reviewed and considered with the aim of resolution for you (and with you). During this process we will all learn how to improve our services and do better in the future.

The JCCP provides two public registers:

- A Professional Standards Authority (PSA) Accredited Practitioner Register
- A Register of Approved Qualifications and Approved Education and Training Providers (which is not accredited by the PSA)

The JCCP also has a duty of candour to ensure that it conducts its business in accordance with its Constitutional responsibilities, Company Law, and the governance requirements of the UK Charity Commission.

The JCCP 'Mission' places public protection and patient safety at the core of its activities. The JCCP has set out its values against which its functions may be judged and held to account:

### Values of the JCCP

- To uphold Patient Safety and Public Confidence as the core driving forces of the JCCP
- To operate its Registers of Practitioners and Approved Education and Training Providers under a Code of Practice that embodies robust ethical standards
- To be open, fair, and independent
- To commit to Equality of Opportunity, Inclusion and Diversity
- To work in partnership with patients and all key stakeholders in the aesthetic industry
- To recognise innovation and evidenced-based practice and respond to change

We discharge our responsibility to protect members of the Public by:

- Applying strict standards for entry to the JCCP PSA accredited Practitioner Register and to the Education and Training Register (non-PSA Accredited) and for continued registration
- Approving qualifications and education and training providers that deliver qualifications that meet the standards
- Maintaining a register of individuals who successfully complete those programmes and approval procedures
- Taking action if the standards may not have been met
- Establishing clear and simple procedures to enable the public to raise issues of concern about the professional practice of registrants or other key issues of concern related to aesthetic education, training and standards of aesthetic practice
- Providing simple and easily accessible information to the public who are considering non-surgical aesthetic treatments

It is natural that you might feel worried about raising a concern. We at the JCCP understand this and will take your concerns seriously, look into what you say and provide you with the support, advice and guidance to raise your concern. The JCCP will not tolerate the harassment or victimisation of anyone raising a concern, nor will we tolerate any attempt to dissuade you from raising a concern. Such behaviour would be a breach of our values as an organisation and, if your concern/complaint is upheld following our investigation, this could result in disciplinary action being taken by the JCCP's Fitness to Practise team against the Registrant concerned.

Raising a concern is seen by us at the JCCP, and by our Registrants and Education and Training providers, as a positive and helpful thing to do. Whatever the result of your complaint, there will never be a backlash or reprisal. More likely there will be thanks for assisting us to improve service user experience and the quality of the services provided to members of the public within the non-surgical aesthetic sector.

Whether or not the person/organisation is JCCP registered or approved, you can still tell us at the JCCP about your concern. The JCCP may investigate our Registrants and Approved Education and Training Providers and take any necessary action, or it may share your concerns about non-Registrants/education providers with relevant bodies (such as the professional statutory bodies [e.g., the General Medical Council, the General Dental Council or the Nursing and Midwifery Council etc.]), or the Advertising Standards Authority). The JCCP also has a duty to share relevant information regarding complaints regarding our Registrants with other Professional Standards Authority Accredited Registers in the interests of transparency and public protection

## **Complaints about the Joint Council for Cosmetic Practitioners**

The JCCP and its Trustees are accountable for the manner in which it conducts its business in accordance with its Constitutional responsibilities and in accordance with both Company Law and with the governance requirements set down by the UK Charity Commission (as noted above). Any complaints that are related to the JCCP itself should be reported directly to the JCCP via its complaints portal at [complaints@jccp.org.uk](mailto:complaints@jccp.org.uk).

Complaints relating to the JCCP are the responsibility of the Executive Chair and Registrar of the JCCP.

## **JCCP Registrants**

All JCCP Registrants abide by a Code of Practice that requires them to explain to you what to do if you are concerned about your treatment and patient/client experience. You can check if the person you are concerned about is one of the JCCP's Registrants by clicking here . The JCCP also places a responsibility on all Registrants to ensure that they are open and honest when things go wrong during the exercise of their duty of care for patients/service users and during their treatment process. Such responsibilities and expectations are set down in the JCCP/Code of Practice (which is available for inspection on the JCCP website).

All JCCP Practitioner Registrants are required to have a 'Complaints Procedure' in place. If you wish to raise a concern, ask to see your Practitioner's Complaints Procedure. Read it, and decide what to do next. Discuss it with your Practitioner. Most often, your concern can be sorted out there and then. If you and your Practitioner cannot agree, there are ways to resolve your complaint. The choice of which depends on the Practitioner's type of practice.

1. If your Registrant works as a self-employed practitioner, they may belong to the [Cosmetic Redress Scheme](#). This scheme provides an independent arbitration service to deal with complaints and breaches of consumer legislation such as perceived unfair treatment by the registrant to the complainant.
2. If the Registrant works in a large cosmetic chain such as, for example 'sk:n' or 'The Private Clinic', then the clinic will offer you access to its internal processes initially and then to the [Independent Sector Complaints Adjudication Service \(ISCAS\)](#) if they are unable to solve your complaint. A completely independent person (mediator or adjudicator) will assess the evidence you submit and make an adjudication or mediation which is binding upon both you and the provider
3. If the Registrant does not offer you a way to make your complaint, or you prefer to come direct, then feel free to raise your concern with the JCCP. Using the complaints form above

Complaints relating to JCCP Practitioner Registrants are the responsibility of the JCCP Practitioner Register Committee who will review any complaint made against its Registrants in accordance with the JCCP's published Fitness to Practice procedures (as published on the Practitioner section of the JCCP Website).

### **JCCP Approved Education and Training Providers**

All JCCP Approved Education and Training providers and Qualification Awarding Bodies (as published on the Education and Training section of the JCCP Website) abide by conditions set by the JCCP that requires them to provide their programmes of study strictly in accordance with the JCCP 'Competency Framework' (2028)? and in accordance with conditions set down by JCCP/Ofqual/SQA Approved Awarding Bodies. You can check if the education and training provider you are concerned about is one of the JCCP's Approved providers by searching on the JCCP's website (as published on the Education and Training section of the JCCP Website). The JCCP also places a responsibility on all Approved Education and Training Providers to ensure that they are open and honest when things go wrong during the exercise of their duty of care for patients/service users and during their treatment process.



Complaints relating to JCCP Practitioner Registrants are the responsibility of the JCCP Education and Training Committee

### **Who can raise concerns?**

As well as patients/clients who have received aesthetic treatments any member of the public, and anyone who works (or has worked) in the non-surgical cosmetic or hair restoration surgery sector can raise concerns; this includes contractors, product manufacturers, insurers, pharmacists, education and training providers and any other interested party.

### **What concerns can I raise?**

You can raise a concern about any risk, malpractice or wrongdoing you think may harm patients/clients. Just a few examples might include (but are by no means restricted to):

- complaints about the JCCP and its appointed Trustees and the manner in which the Council discharges its functions and responsibilities
- unsafe patient/client care or treatment experience
- unsafe working/premises standards
- inadequate induction or training for practitioners
- lack of, or poor response to a reported patient safety incident
- breaches of equality standards
- matters relating to inappropriate advertising of services or educational provision
- unacceptable experiences relating to dignity and respect
- breaches in information governance or data sharing/confidentiality
- unacceptable performance by one of the JCCP's approved education and training providers/awarding bodies.

The JCCP Registrar will determine if the matter of concern raised is an appropriate matter to be dealt with by the JCCP. All complaints about Registrants will be referred to the Chair of the JCCP Practitioner Register Committee for consideration and action.



## **What should I do if I am dissatisfied with the outcome of my Complaint?**

Complainants are invited to initiate the following appeals process after a decision has been made by the JCCP on the outcome of a previously presented complaint. For example:

- A complainant has been told that the JCCP will not follow up the concern as it does not meet their definition of a 'complaint'.
- A complainant is dissatisfied with the speed of the follow up process.
- The JCCP has completed its investigation of the complaint follow up and the complainant is dissatisfied with the outcome.

### **Step 1 - Initiation of the appeals process**

- Please submit (in writing) as much information as possible about the reason why you are dissatisfied.
- Please submit your appeal to [complaints@jccp.org.uk](mailto:complaints@jccp.org.uk). Upon receipt of the complaint the complaint will be referred within three working days to the JCCP Registrar and the date the appeal was received will be recorded.
- The complainant will be informed at that time that the matter has been referred to the JCCP Registrar for consideration.

### **Step 2 - Carrying out the appeal**

The JCCP Registrar will:

- Process appeals relating to issues where a decision was made not to follow up a complaint, or where the complaint was followed up by the complaints team.
- Carry out a paper-based review of the complaint to identify whether the JCCP's complaints procedure has been followed.
- Obtain additional information from the JCCP's complaints handling team where this is identified as necessary.
- Investigate the appeal and reach a decision within 10 working days of the appeal being raised.

### Step 3 - Actions resulting from the appeal

- Instruct the JCCP complaints team where further lines of enquiry are identified.
- Inform the complainant of the outcome of the appeal and advise them and explain the reasons for this decision.
- Advise the complainant, if necessary, that if they remain dissatisfied, they can take the appeal to the next stage and request a formal review of the appeal decision by two independent JCCP Board Trustees.

### Confidentiality

We hope you will feel comfortable raising your concern openly, but we also appreciate you may want to raise the matter confidentially. This means that while you are willing for your identity to be known to the JCCP, you do not want anyone else to know your identity.

Therefore, we will keep your identity confidential and process your personal data in line with our privacy notice, if that is what you want, unless required to disclose it by law (for example, by the police). You can of course choose to raise your concern anonymously, without disclosing your name, but that will make it difficult for us to investigate thoroughly and to provide you with feedback on the outcome of any investigations.

These guidelines are written in support of the [JCCP values and mission](#).

Implementation April 2023

Reviewed April 2023

