

PRACTITIONER REGISTRANT NEWSLETTER

November 2019

JCCP Governance and the Practitioner Register Committee

The JCCP has been functioning officially for eighteen months now. During this time the JCCP has formally established its governance structures and has appointed a fully representative Board of Trustees, all of whom are registered with the Charity Commission and Companies House. Conflicts of interest policies confidentiality procedures have been put in place to guide the work of the Charity.

The JCCP Practitioner Register Committee (PRC) has met regularly during this period and has been provided with legal advice from Bevan Brittan (our legal advisers) to enable us to fully embed the Council's Fitness to Practise (FtP) Rules (copies of which may be found on the JCCP website). A full 'suite of' policies and procedures governing the JCCP's FtP processes is now fully embedded and fitness to practise panellists have been appointed by an independent Appointments Committee on behalf of the Council in April/May 2018. Additional Panellists have been appointed throughout since that date to provide a fully representative group of lay and professional FtP panel members (a full list of the JCCP's Fitness to Practise Panellists is available to view on the Council's website).

JCCP Annual Registrant Renewal Requirements and Sampling Requirements

The following table provides JCCP Registrants with a summary of their annual renewal requirements:

JCCP Annual Registrant Renewal Requirements

Continuous Professional Development (CPPD)	Self-declare but keep evidence
Premises	Self-declare
Fitness to Practise (FtP)	Self-declare
Indemnity	Upload evidence
Log Book (no. of Treatments)	Upload data for number of treatments performed for each modality. (check minimum number achieved)
Audit 1 PROM's, complaints procedure and quality control	Self-declare against CPSA standards but keep evidence
Audit 2 Adverse incidents	Self-declare against CPSA standards Self-declare that you have reported to MHRA and Northgate



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The Professional Standards Authority – PSA - (the Government body that oversees the JCCP’s Practitioner Register as well as the professional healthcare registers) requires the Council to undertake a 5% annual sample of all Registrant self-declarations for CPD and compliance with JCCP premises standards. As such the JCCP Practitioner Register Committee has produced procedures relating to the annual audit/sampling of registrant’s self-returns for premises standards and for CPPD and has approved arrangements for practitioner annual renewal of registration. The annual sample is chosen anonymously and those selected are informed in July, for the submission of evidence in October of each year. This Autumn the JCCP undertook its first ‘sampling’ exercise which proved to be both effective and reassuring, demonstrating practitioner proficiency to practise. Registrants are reminded of the need to ensure that their premises comply with published JCCP ‘Premises Standards’ for the treatments that they conduct, ensure that they maintain their annual CPD requirements and undertake the minimum number of treatments/log book entries required each year to ensure that their practice complies with JCCP/CPSA standards <http://www.cosmeticstandards.org.uk/>. The annual sampling process is conducted purposefully, demonstrating the JCCP’s commitment to patient safety and to maintaining high standards. The JCCP has selected an example of one evidence-based reflective account that was submitted by a Registrant as part of the 2019 sampling exercise (with their agreement) that provides an illustration of the standard that was considered to be required by the JCCP Practitioner Register Committee.

A range of new documents/templates have been produced to assist registrants who have been selected to participate in the annual sample exercise. These may be accessed via the following web links:

1 - JCCP - Practitioner Register Annual sampling procedure for workplace premises standards and CPPD: <https://www.jccp.org.uk/ckfinder/userfiles/files/1%20PremisesSampling.pdf>

2 - Guidance and Request for the Submission of Requested Evidence to Support CPPD, Premises Self-Declarations and Treatment Numbers: [https://www.jccp.org.uk/ckfinder/userfiles/files/2%20CPDEvidence%20guidance%20v1\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/2%20CPDEvidence%20guidance%20v1(1).pdf)

3- Treatment log template: <https://www.jccp.org.uk/PractitionersAndClinics/structure-of-the-register>

4- CPD Continuing Personal & Professional Development Record: <https://www.jccp.org.uk/PractitionersAndClinics/structure-of-the-register>

5 - CPD Reflective Accounts Template: <https://www.jccp.org.uk/PractitionersAndClinics/structure-of-the-register>

6 - Example of Sampled Evidence CPD Log: [https://www.jccp.org.uk/ckfinder/userfiles/files/6%20cpd-log%20JCCP%20OCT%202019\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/6%20cpd-log%20JCCP%20OCT%202019(1).pdf)

7 - Example of Sampled Evidence Reflective Accounts: [https://www.jccp.org.uk/ckfinder/userfiles/files/8%20-%20JCCP%20-%20reflective%20accounts%20form%201%20-%20Oct%202019\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/8%20-%20JCCP%20-%20reflective%20accounts%20form%201%20-%20Oct%202019(1).pdf)

8 - Example of Sampled Evidence Reflective account 2: [https://www.jccp.org.uk/ckfinder/userfiles/files/7%20JCCP%20-%20reflective%20accounts%20form%202%20-%20oct%202019\(2\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/7%20JCCP%20-%20reflective%20accounts%20form%202%20-%20oct%202019(2).pdf)

9 - Example of Sampled Evidence Treatment Log: [https://www.jccp.org.uk/ckfinder/userfiles/files/9%20-%20JCCP%20treatment%20log%2007_18-07_19\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/9%20-%20JCCP%20treatment%20log%2007_18-07_19(1).pdf)



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The Practitioner Register Committee also provided oversight for the amendment made to the JCCP Practitioner Register that resulted in PSA approval being provided for the implementation of Part 'A' – 'Category Two' registration for health care professionals. Revised definitions for these categories were also produced and endorsed by the PRC in November, 2018. Initial entry to Part 'A' – 'Category Two' of the JCCP Practitioner Register now been extended until January, 2021. All Registrants who are currently registered on Part 'A' – 'Category Two' of the JCCP register are reminded that they have two years from the date of their registration within this category to either produce evidence that they have been awarded a qualification that is recognised by the JCCP as meeting the standards for their practising modality/modalities (for which they are registered with the JCCP) or that they have attended a JCCP approved 'fast track assessment centre' to confirm their compliance with JCCP standards as set out in the September, 2018 '**JCCP Competency Framework**' – <https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%20Competency%20Framework%20final%20V8%20September%202018.pdf>

The JCCP will be announcing details of approved 'fast track assessment centres' by April, 2020.



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JCCP 2020 Public Safety Campaigns

This year the JCCP has identified a number of key themes to transact which the Council considers, working closely with its partners, could a positive impact on patient safety and public protection. As such four campaign areas have been identified for 2020:

- Safe products and safe suppliers
- Education and Training
- Promoting Positive Wellbeing and Mental Health and Aesthetics
- 'Safety in Beauty'

Safe Products and Safe Suppliers

This issue has been raised by leading pharma companies in the sector and the internet supply pharmacies. Members of the public have unregulated access to a range of imitation products that have been manufactured and supplied without CE marking or MHRA authorisation. The JCCP is aware that many new internet and 'pop up pharmacies' enter the UK access market regularly. The JCCP has brought together a number of the key aesthetic Pharma Companies and Pharmacy Suppliers (including the MHRA) to form a working group to map out a series of actions linked to a public safety campaign targeted at:

Practitioners – this seeks to promote public and practitioner awareness of the need to ensure that all products used as part of the treatment process are recognised, approved and supplied from bona fide suppliers.

General Public/Patients/Customers – raising consumer awareness about the need to ask practitioners about the products they are using, where they have been sourced from and the safety/approval kitemarks that they are endorsed with.

Suppliers – raising understanding of the key risk areas and the need to remain vigilant regarding the sourcing, supply and distribution of those higher risk products that are known to 'prone to abuse'.

Reporting of Complications and Adverse Events – working with the MHRA and other organisations to promote a co-ordinated approach to the reporting of complications and untoward incidents, focused on the 'Yellow Card' system.

Education and Training

Education and the training of practitioners is a major area of activity for the JCCP. The JCCP has identified the following priority areas for this campaign:

- The importance of ensuring that education and training organisations provide appropriate education and training programmes and qualifications that enable practitioner's to evidence that they are able to practise safely, effectively and proficiently.
- Continuing to work closely with Ofqual and other national education and training regulators to create greater understanding of the problems and requirements for cosmetic education
- Identifying and targeting those education and training providers who are profess to offer qualifications and training programmes that do not reflect the standards to deliver safe and competent aesthetic treatments. This is a key JCCP campaign working alongside the Advertising Standards Authority (ASA) to respond to inaccurately or exaggerated claims promoted and advertised by some unregulated education and training organisations..



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Promoting Positive Well Being and Mental Health for Persons Seeking Aesthetic Treatments

There is agreement across the aesthetic sector that all persons that seek to receive aesthetic procedures should be afforded every opportunity to be informed about what they can expect to achieve from the procedure, and to be able to evaluate this against any known risks that might be associated with the treatment itself. This is an important decision which enables the consumer to make positive life choices that they consider will enhance their overall health and emotional wellbeing. It is a decision that is often influenced by advertising and social media, which in itself presents a risk. For those who seek aesthetic treatments, emotional and psychological needs may also be identifiable. Body Dysmorphia, for example is one clinically defined condition but there are other emotional/psychological challenges that affect patients/consumers and which might make them vulnerable and lead them to rush into decisions about their treatment options. These consumers are potentially vulnerable. The JCCP has developed a partnership with the Mental Health Foundation and a number of experts in this area to raise awareness of these issues amongst members of the public and aesthetic practitioners.

The campaign will seek to:

- Promote positive and effective messaging to consumers and practitioners, including responsible marketing and the appropriate and 'safe' use of social media/Apps that support and promote positive mental health and wellbeing.
- Encourage responsible advertising and promotion of services to consumers
- Consider how practitioners can build trust with consumers through the use of toolkits, checklists and 'informed conversations and consultations' to inform responsible consultation and build trust with consumers
- Produce short video clips or 'U Tube' postings etc
- Assist in the production of an on line training package/assessment toolkit for practitioners etc.

'Safety and Beauty'

The JCCP recognises the role of the beauty sector in aesthetics but is also concerned about the 'risks' involved in some of the more invasive treatments being undertaken by non-medically qualified practitioners. The JCCP believes that the focus needs to be on educating the general public about the positive role that the beauty sector can play in aesthetics but also to raise awareness about 'risks' associated with some of most popular procedures that are currently being undertaken by non-healthcare practitioners, some of whom practise without supervision and oversight and in the absence of appropriate regulated qualifications that comply with the 2018 JCCP Competency Framework. Key issues to be considered will include the need to:

- provide members of the public with 'simple' 'bite sized' messages about what constitutes safe practice for the consumer, including a list of key questions that the consumers to ask of their intended therapist to evidence their adherence to safe practice and public protection.
- review and consider the issue of insurance companies operating appropriately with regard to patient risk and to review the role that they play in affording 'credibility' to a wide range of disparate practitioners and providing assurance to the public that the practitioners they insure are competent and appropriately trained to practise in 'safe' premises and that they are using safe and ethically sourced products; the need to seek to promote mandatory insurance requirements for all practitioners.



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- ensure that professional statutory regulatory bodies hold their registrants to account over professional matters, such as the need to refrain from any form of remote prescribing and the need to provide additional safeguards about the prescription, supply, administration, storage and professional oversight of prescription only medicines. The JCCP has produced guidelines that relate to responsible prescribing –
[https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%20prescribing%20statement%20Final\(1\).pdf](https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%20prescribing%20statement%20Final(1).pdf)
- for more valid and reliable empirical/evidence-based research to enable risk to be calculated and appropriate mitigations to be put in place in the interests of public protection.
- clarify the role of the DHSC and other UK Government Administrations in highlighting patient safety in the sector.
- ensure that all practitioners use only ethically sourced and safe ‘licensed’ products as part of their treatment process.
- pursue the JCCP declared policy of seeking to promote the need for all dermal fillers to be classified as ‘prescription only devices’ (in the interest of public protection and patient safety).
- better co-ordinate and consolidate the way in which complications and adverse events are reported and acted upon with the aim of reducing harm and improving patient safety and service improvement/effectiveness.
- ensure that all beauty therapists work in close association with their local Environmental Health Officer to implement the highest standards required for safe premises in accordance with the standards set down and published by the JCCP and CPSA.
- work with the aesthetic press to encourage the promotion of safe and effective practice, assisting also in clarifying the ‘public safety message’ and helping to dispel the confusion and misunderstanding that exists across the sector by creating and disseminating ‘one message that we can all sign up to and promote’.

Other Issues

Code of Conduct

Registrants are reminded of the importance of complying with the JCCP/CPSA Code of Conduct (March, 2018) at all times -

<https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP%26CPSA%20Code%20of%20Practice.pdf>



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Adjunctive Therapies

The Professional Standards Authority has invited the JCCP to consider this issue as part of the 2019 Annual review process in order to provide members of the public with informed assurance about the practitioners who perform such treatments. The JCCP accepts that our registrants may elect to perform adjunctive and/or orphan therapies. Adjunctive therapies relate to any non-surgical aesthetic procedure that a Registrant performs in addition to those registered modalities that are formally recognised by the JCCP. These may include, for example, the adjunctive use of injectable local anaesthetic or stand-alone treatments such as plasma ('PRP' or 'energy based') or threads. It is important to understand that these treatments are not *currently* 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 is unable endorse evidence of practitioner competence to perform them safely or effectively. While we do not ask registrants to refrain from offering "adjunctive" / "orphan" treatments, we do of course expect that all registered members 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.

"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)

It is also important registrants do not suggest or imply to their clients/patients that the 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. The JCCP has published a new Policy Statement on Adjunctive Therapies and Orphan Treatments - this policy statement informs and reminds all registrants on both parts of the register of the expectations they should consider when carrying out *any* treatment with regard to safe, ethical and responsible practice –

<https://www.jccp.org.uk/ckfinder/userfiles/files/AdjunctiveTherapiesStatementFinal.pdf>



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