



Update Regarding the Review of the JCCP's 2018 Changes to the Practitioner Register - Statement on Entry to Part Two of the JCCP Register – Non-Clinical

On 31st July 2018, the JCCP determined that access to the Council's Practitioner Register for persons who practise treatments involving injectables of Botulinum Toxin and Dermal Fillers should be restricted for a three year period to relevantly qualified, registered, experienced and proficient healthcare professionals (HCPs) who are Registered on Part 1 of the JCCP Register. At that time the JCCP affirmed that 'In the future only designated qualified healthcare clinicians will be permitted entry to the JCCP register with regard to these 'higher risk' procedures'. Subsequently, The Council suspended access to its Register for all non-healthcare persons who practise injectable procedures for a period of 3 years whilst an evaluation/review could take place of the 'risks' involved to the general public.

The decision to continue to restrict access to the JCCP Practitioner Register for non-healthcare practitioners was not solely related to competence but a number of factors that were deemed could compromise patient safety and public protection. These were as noted follows:

- There are still no Professional Statutory Regulatory Bodies (PSRBs) for beauty therapists or laypersons who perform invasive non-surgical aesthetic treatments. The JCCP noted that whilst it requires its registrants to self-declare against the JCCP/CPSA Code of Conduct (2020), CPSA Practice Standards (2018) and the JCCP Competency Framework (2018), in the case of misconduct it (and members of the general public) have no powers to take formal action regarding the unrestricted right to practise for non-healthcare practitioners.
- There are still no appropriate progression pathways that would enable non-healthcare practitioners to attain a post graduate regulated qualification which is the minimum level required (as set down in the JCCP Competency Framework, 2018) and despite the publication of National Occupational Standards in advanced cosmetic treatments, there has been little



- development of progression paths to enable those with beauty qualifications to progress via regulated qualifications to post graduate level.
- There are still no official or developed systems for the central reporting of complications therefore allowing any analysis or review of any evidence relating to patient safety and risk.
 - At present, only prescribers have the rights to hold or instantly prescribe reversal agents or other medicines required to manage dermal filler complications and other adverse events from injectable treatments.
 - There is still very little public awareness about the levels of risks surrounding these treatments
 - There remains a lack of regulation around who can inject and there is still no formal requirement to have any qualification or to demonstrate competence to provide injectable treatments, despite the known and evidenced risks that are associated with such procedures.

Over two years on from this decision point, the JCCP Trustees are of the opinion that further evidence is required to inform a final position of this matter. Of primary importance is the fact there have been no changes with regard to the UK Government's inclination to introduce further primary or secondary legislative changes to enhance and improve public protection and consumer safety. It is also a matter of fact that no systematic reviews have been undertaken during the past two years to inform the potential risks that more invasive aesthetic procedures present to members the public. The JCCP also remains concerned that the provision of education and training also remains unregulated in the United Kingdom despite the advice provided to Government and NHS England by both Health Education England in 2016 and by the JCCP (as set down within the context of the JCCP Competency Framework which was published in 2018) .

However, evidence is now emerging to advise that Government, MPs, media and national bodies are beginning to focus more on patient safety linked to cosmetic treatments, including the risks to both physical and mental health and wellbeing. This has been evidenced by the increase in the number of Parliamentary Questions that have been asked in the House of Commons (and by the Scottish Government), the establishment of the All Party Parliamentary Group (APPG) on Beauty, Aesthetics and Wellbeing and by increased media attention and public conversation that are taking place regularly with regard to both the positive and potential challenges and risks associated with the administration of aesthetic treatments in the UK.



The JCCP supports these developments and affirms its declared position that UK Government should move as soon as possible to regulate the sector in order to protect public, with our most recent efforts presented in the form of an 18-page dossier¹ and oral evidence to the ongoing Inquiry conducted by the APPG for Beauty, Aesthetics and Wellbeing. The Council has also worked closely with the Chartered Institute of Environmental Health (CIEH) who have also recently published their concerns and considerations around aesthetic practice in the UK in the form of two written reports². Underpinning the CIEH reports are recommendations around the mandatory licensing of premises and practitioners and the need for an agreed mandatory framework of qualification standards and competencies for aesthetic practitioners.

The JCCP resolved at its Trustee Board meeting in September, 2020 that due to the lack of new evidence (relating to the challenges presented earlier in this statement) and in recognition of the fact that Covid-19 has caused disruption and delay to the nation's parliamentary timetable this year, including the progress of the APPG's work and the Government's response to the same, that the JCCP is not best equipped at this stage to make any material changes to the decision that we made in 2018 to restrict eligibility to join the Council's Practitioner Register to administer injectable botulinum toxin and dermal filler procedures to designated and regulated healthcare professionals only. The Council has therefore decided to extend this current position until August, 2022.

Should there be a substantial change in Government policy or new evidence to inform this decision prior to this date, we will, of course, bring forward our review immediately and until then we will continue our work to greater regulation within the aesthetic sector and in particular to achieve statutory regulation of premises and practitioners and compliance with qualification and practice standards across the industry. The JCCP, in partnership with the Cosmetic Practice Standards Authority (CPSA), has achieved significant landmarks following the publication and implementation of written codes of

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<https://www.jccp.org.uk/ckfinder/userfiles/files/APPG%20Response%20%20Response%20to%20APPG%20.pdf>

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<https://www.cieh.org/media/4409/r1-regulation-of-cosmetic-treatments-in-the-uk.pdf>
https://www.cieh.org/media/4408/r2-improving-the-safety-of-cosmetic-treatments-in-england.pdf?fbclid=IwAR03JAbnRw-c-sqzg5Nlj8GgPWixt_TCWKZPd_4_yh8ZuNw2DqQhuLoL6Sg



practice, standards, frameworks and memoranda of understanding pertaining to all fields of aesthetic interventions, including practice, clinical premises, prescribing and education leading to regulated qualifications. Therefore, should the Government decide to move forward by mandating standards and qualifications within the sector then the JCCP and the CPSA consider that they have the requisite 'building blocks' in place to oversee and implement policy in this area in order to promote both patient safety and public awareness.

ENDS

Additional notes:

The Joint Council for Cosmetic Practitioners (JCCP), was formally launched in February 2018 as a 'self-regulating' voluntary organisation for the non-surgical aesthetics and hair restoration sector in the United Kingdom and has achieved Professional Standards Authority (PSA) recognition and **charitable status**. The charitable status reflects the overarching not-for-profit mission of the JCCP which is to improve patient safety and public protection. The concept of the JCCP was envisioned by the Department of Health and was instigated by Health Education England on behalf of NHS England and the Department of Health in 2015.

For general information and enquiries on the JCCP go to:

www.jccp.org.uk [add link](#)

Professor David Sines OBE – Executive Chair – JCCP

david.sines@jccp.org.uk