

## PATIENT SAFETY RISK MATRIX – March 2020

Risks to Public	Description of Risk	Likelihood	Impact	Inherent Risk Factor	Identify Existing Controls and Effectiveness of Mitigation	Is Risk Increasing, Decreasing or Static?	Likelihood	Impact	Residual Risk Factor	Risk Owner
1	Registrant makes a false declaration to meet JCCP/CPSA standards	2	5	10	Regular audit of registration function to be undertaken to ensure that rigorous data processing and checks are undertaken pre-registration. Effective mitigation control assumed.	Decreasing	1	5	6	CEO and Chair of Fitness to Practice Committee
2	Complication arising due to the dishonest and unsafe use by registrant of an unlicensed product	2	5	10	Code of practice self-declaration to meet legitimate standards is explicitly set down. Pharmacy suppliers will work with the JCCP to educate registrants. JCCP will advise their approved education and training providers to evidence compliance with safe prescribing and safe product use standards in course delivery. Supervision requirements to be set down to reduce the likelihood of poor practice and unsafe care delivery. Effective mitigation control assumed.	Decreasing	1	5	5	CEO and Chair of Education and Training Committee
3	Registrant administers prescribed medicines that were not required, or of an unsafe strength and quantity to the patient (e.g. injury caused through the inaccurate injection or toxins).	2	5	10	Code of practice self-declaration to meet legitimate standards is explicitly set down. Pharmacy suppliers will work with the JCCP to educate registrants. JCCP will advise their approved education and training providers to evidence compliance with safe prescribing and safe product use standards in course delivery. Supervision requirements to be set down to reduce the likelihood of poor practice and unsafe care delivery. Effective mitigation control assumed.	Decreasing	1	5	5	CEO and Chair of Education and Training Committee
4	Unintentional consequence of a procedure performed by a proficient registered practitioner	3	5	15	The risk could remain static but is expected to decrease. The JCCP will encourage compliance with supervision and peer review	Decreasing	2	5	10	CEO and Chair of Education and Training Committee

					requirements. JCCP will advise their approved education and training providers to evidence compliance with safe prescribing and safe product use standards in course delivery. The JCCP will also collect adverse incident data to inform best practice and risk of harm reduction. Effective mitigation control assumed.					
5	Consequence of a procedure performed by a registered practitioner who acts beyond their scope of proficiency or in the absence of appropriate supervision (e.g. resulting in harm being acquired to the patient such as a burn as the result of a chemical peel etc. or as the consequence of the maladministration of dermal fillers). <b>Or</b> for those Registrants who are not already on a Professional Statutory Register – failure to recognise and interpret clinical symptoms or to know when to refer to an appropriate clinician in the event of an emergency or when complications as a result of treatment occur.	3	5	15	The risk could remain static but is expected to decrease. The JCCP will encourage compliance with supervision and peer review requirements. JCCP will advise their approved education and training providers to evidence compliance with safe prescribing and safe product use standards in course delivery. The JCCP will also collect adverse incident data to inform best practice and risk of harm reduction. Effective mitigation control assumed. The JCCP will also require all practitioners to be provide evidence of emergency procedures that are in place to ensure that access to advice and/or intervention from an appropriately qualified health care professional is available when required (e.g. in the event of a clinical emergency).	Decreasing	2	5	10	
6	Infections causing patient harm	2	4	10	Good practice guidance has been issued and will be shared with all registrants. JCCP will build asepsis and harm free care delivery training into all of their approved education and training courses. The JCCP will also encourage compliance with supervision and peer review requirements. Effective mitigation control assumed.	Decreasing	2	3	6	CEO and Chair of Education and Training Committee
7	Illegal administration of procedures to children and your persons under the age of 16 or to young persons	2	5	10	The JCCP Code of Practice and Practice Guidelines makes it explicit that such practices are illegal and will result in legal and	Decreasing	1	5	5	CEO and Chair of Education and Training Committee and

	aged 16 and 17 without their informed consent				professional sanctions. The JCCP will provide education and training to reinforce this requirement and undertake publicity campaigns to promote this standard. Effective mitigation control assumed.					<b>the Chair of the Fitness to Practise Committee.</b>
<b>8</b>	Psychological and emotional harm caused by failure to provide informed consent	2	5	<b>10</b>	The JCCP Code of Practice and Practice Guidelines makes it explicit that such practices are unacceptable and will result in legal and professional sanctions. The JCCP will provide education and training to reinforce this requirement and undertake publicity campaigns to promote this standard. Effective mitigation control assumed.	<b>Decreasing</b>	<b>1</b>	<b>5</b>	<b>5</b>	<b>CEO and Chair of Education and Training Committee and the Chair of the Fitness to Practise Committee</b>
<b>9</b>	Misrepresentation of treatment or proficiency due to misleading advertising	2	5	<b>10</b>	The JCCP Code of Practice has been endorsed via an MoU with the Advertising Standards Authority. The JCCP Practice Guidelines makes it explicit that such practices are unacceptable and will result in legal and professional sanctions. The JCCP will provide education and training to reinforce this requirement and undertake publicity campaigns to promote this standard. Effective mitigation control assumed.	<b>Decreasing</b>	<b>4</b>	<b>4</b>	<b>8</b>	<b>CEO and the Chair of the Fitness to Practise Committee</b>
<b>10</b>	Failure of Registrant to honestly self-declare that their premises and CPPD requirements meet JCCP premises and CPSA practice standards	2	5	<b>10</b>	The JCCP recognises the risks associated with a false declaration against premises and CPPD standards. The JCCP has identified that any false declaration could result in fitness to practise proceedings and sanctions. The JCCP will undertake to audit a 5% sample of annually reported self-declarations as part of a 'table top' exercise where independent verification of compliance will be sought from the Practitioner's supervisor or from other reliable sources.	<b>Static/Decreasing</b>	<b>2</b>	<b>4</b>	<b>8</b>	<b>CEO and the Chair of the Fitness to Practise Committee</b>
<b>11</b>	Health and safety accident linked to failure to meet premises standards	2	5	<b>10</b>	The JCCP has published specific premises standards that inform registrants of the standards that must be evidenced to reduce	<b>Decreasing</b>	<b>2</b>	<b>4</b>	<b>8</b>	<b>CEO and the Chair of the Education and</b>

					unsafe health and safety practice. These matters are reinforced in the JCCP Code of Practice. Education and Training will be provided to Registrants to encourage compliance with these standards. Effective mitigation control assumed.					<b>Training Committee</b>
<b>12</b>	Health and safety accident by registrant who has met premises standards	1	5	<b>5</b>	The JCCP has published specific premises standards that inform registrants of the standards that must be evidenced to reduce unsafe health and safety practice. These matters are reinforced in the JCCP Code of Practice. Education and Training will be provided to Registrants to encourage compliance with these standards. Effective mitigation control assumed.	<b>Decreasing</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>CEO and the Chair of the Education and Training Committee</b>
<b>13</b>	Failure to provide emergency equipment to deal with clinical emergencies	2	5	<b>10</b>	The JCCP has published specific premises standards that inform registrants of the standards that must be evidenced to demonstrate practitioner competence to respond to clinical emergency situations effectively and in a timely manner. Such requirements are reinforced in the JCCP Code of Practice. Education and Training will be provided to Registrants to encourage compliance with these standards. Effective mitigation control assumed.	<b>Decreasing</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>CEO and the Chair of the Education and Training Committee</b>
<b>14</b>	Failure of registrant to comply with JCCP/CPSA supervision and oversight standards	2	5	<b>10</b>	The JCCP has published an explicit supervisory/oversight framework that sets down requirements for supervision for a range of differentiated risk-assessed treatments. The register will annotate which Registrants require supervision and will contain published details of the name and PIN number of their supervisor. These details will be audited annually. Sanctions will be applied for non-compliance with these required supervisory	<b>Decreasing</b>	<b>1</b>	<b>4</b>	<b>8</b>	<b>CEO and the Chair of the Fitness to Practise Committee</b>

					standards. Effective mitigation control assumed.					
15	Registrant performs treatments outside of those premises registered in line with the JCCP/CPSA agreed standards for premises and health and safety issue occurs	2	5	10	The JCCP has published specific premises standards that inform registrants of the standards that must be evidenced to reduce unsafe health and safety practice. These matters are reinforced in the JCCP Code of Practice. Education and Training will be provided to Registrants to encourage compliance with these standards. Effective mitigation control assumed.	Decreasing	1	5	5	CEO and Chair of Education and Training Committee and the Chair of the Fitness to Practise Committee
16	Registrant performs 'adjunctive' (non-evidence based) procedures that fall outwith the current procedural modalities/standards set by the JCCP and CPSA and which might result in harm occurring to members of the public	2	5	10	The CPSA and the JCCP are attentive to this matter and engage in 'horizon setting' activities in partnership with the CQC and the MHRA to identify emergent risks associated with 'orphan' or 'adjunctive' procedures/therapies transacted in the cosmetic and 'wellness' sectors/industries. JCCP Registrants are advised to assess all risks associated with potential harm that might be occasioned to members of the public following administration of such treatments and to ensure that appropriate supervision and safeguards are taken to mitigate such risks. The JCCP has now published a policy on its website that outlines the Council's approach to adjunctive therapies and 'orphan' treatments' and which advises Registrants of the Council's expectations of responsible practice of the same.	Static	1	5	5	Practitioner Register Committee and CEO in Partnership with the CPSA
17	Registrant acts outside of the JCCP/CPSA Code of Conduct ('JCCP and CPSA Guidance for Practitioners who provide cosmetic Interventions') with regard to vulnerable groups or fails to provide evidence-based information in an accessible form to	2	5	10	The JCCP Code of Practice and Practice Guidelines makes it explicit that such practices are ethically unacceptable and potentially illegal and will result in legal and professional sanctions. The JCCP will provide education and training to reinforce this requirement and undertake	Decreasing	1	5	10	CEO and Chair of Education and Training Committee and the Chair of the Fitness to Practise Committee

	patients in order to obtain informed consent to treatment.				publicity campaigns to promote this standard. Effective mitigation control assumed.					
<b>18</b>	Registrant intentionally or unintentionally breaches information governance requirements/standards leading to a breach of patient confidentiality.	2	5	<b>10</b>	The risk could remain static but is expected to decrease as registrants become increasingly familiar with, and compliant with the information requirements set out in the Council and CPSA Code of Practice. The JCCP will encourage compliance with supervision and peer review requirements. The JCCP will require all approved education providers to ensure that information governance is built in as a core requirement for all education and training courses (including CPPD). The JCCP will also collect adverse incident data that relates to information governance breaches to inform best practice guidance to Registrants. Effective mitigation control assumed.	<b>Decreasing</b>	1	5	5	<b>CEO and Chair of Practitioner Register Committee and the Chair of the Fitness to Practise Committee</b>
<b>19</b>	COVID-19 public safety risk due to national emergency	5	5	<b>25</b>	The JCCP and CPSA have issued a joint statement to advise that all elective aesthetic procedures should not be conducted face to face at the present time and have advised all Registrants to abide by Public Health England's advice on social distance and to wear protective 'equipment'. A policy statement to this effect has been posted on the JCCP website.	<b>Potentially Escalating Risk</b>	5	5	25	<b>CEO and Full Council Board of Trustees.</b>

Risk Matrix		IMPACT →				
		1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
↑ LIKELIHOOD	5 Almost Certain	5	10	15	20	25
	4 Likely	4	8	12	16	20
	3 Possible	3	6	9	12	15
	2 Unlikely	2	4	6	8	10
	1 Rare	1	2	3	4	5

Score	Likelihood (A)	Definition	Impact (B)	Descriptor
5	Is highly likely to occur at some time in normal circumstances.	Very High >80%	Critical long term damage or harm to service users/public Critical reputation impact Intervention by other agencies Huge financial impact	Catastrophic  All potential benefits lost
4	Likely to occur at some time in normal circumstances.	High 0-80%	Major damage or harm to service users/public High reputation impact – national press and TV coverage Minor regulatory enforcement Major financial impact	Critical  Loss of 80-100% of benefits
3	Likely to occur in some circumstances or at some time.	Medium 40-60%	Noticeable damage or harm to service users/public Extensive reputation impact due to press coverage External criticism likely High financial impact	Significant  Loss of 50-80% of benefits
2	Is unlikely to occur in normal circumstances, but could occur at some time.	Low 20-40%	Minor damage or harm to service users/public Minor reputation impact Moderate financial loss	Marginal  Loss of 25-50% of benefits
1	May only occur in exceptional circumstances, highly unlikely.	Very low <20%	Insignificant damage or harm to service users/public Little or no loss of front line service No reputation impact	Negligible  Loss of <25% of benefits