

Accreditation renewal report

Standards 1-8

Joint Council for Cosmetic Practitioners

May 2023

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About the Joint Council for Cosmetic Practitioners (JCCP)

The Joint Council for Cosmetic Practitioners (JCCP) registers:

- Practitioners performing non-surgical cosmetic procedures such as dermal fillers, chemical peels, laser treatments and hair restoration surgery.

This register is separated into two parts:

- The clinical register ('Part A'), for designated healthcare professionals who are registered with statutory regulators
- The non-clinical register ('Part B'), for unregulated aesthetic practitioners, regulated health care professionals who do not meet JCCP's requirements for Part A, or those who are eligible but are not currently regulated or licensed (and who left their regulator in good standing).

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of 1 January 2023, there were 689 registrants on the JCCP's register.

The JCCP was first accredited on 6 April 2018.

On 13 March 2023 we renewed the JCCP's accreditation with a Condition, and Recommendations. They will next be due a full assessment against our Standards by March 2026.

About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against *the Standards for Accredited Registers (April 2016)* and the new Standard 1 introduced in 2021 by the Authority and which includes the ‘public interest test’. Standard One checks eligibility under our legislation, and if accreditation is in the public interest. More about how we assess against Standard One can be found in our *Supplementary Guidance for Standard One*¹.

We used the following in our assessment of the JCCP:

- Documentary review of evidence of benefits and risk supplied by the JCCP and gathered through desk research
- Documentary review of evidence supplied by the JCCP and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Assessment of the JCCP’s complaints procedures.

¹ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

The Outcome

The Accreditation Panel met on 8 and 13 March 2023 to consider The Joint Council for Cosmetic Practitioners (JCCP). The Panel was satisfied that the JCCP could meet with Conditions all the Standards for Accredited Registers.

We therefore decided to renew accreditation with one Condition.

We noted the following **positive findings**:

- The JCCP demonstrated that it has acted swiftly to address concerns and areas for improvement noted during the Authority's assessment.
- This included addressing risks relating to boundary violations by practitioners, and safeguarding, to their risk register. The JCCP has added explicit standards and supporting guidance into its Code of Practise.
- The JCCP has developed effective relationships with stakeholders, including the statutory health regulators and Advertising Standards Authority, reflected in its published Memoranda of Understanding.

We issued the following Conditions to be implemented by the deadline given:

Conditions		Deadline
Standard 2	1. The JCCP must make clear that training providers are not part of the Register of practitioners that is accredited by the Authority. This should be completed within three months of publication of the Authority's decision.	August 2023

We issued the following Recommendations to be considered by the next review:

Recommendations	
Standard 2	1. The JCCP should publish its registration appeals process.
2	2. The JCCP should provide clearer information about what its different membership categories mean in practice.
2	3. The JCCP should set out how it will take into account professional conduct outcomes issued by other regulatory bodies in its own registration decisions.
4	4. The JCCP should make clearer to the public how it maintains confidence in the ongoing quality assurance of education training courses that must be completed to gain entry to the register.

5	5. The JCCP should review whether the initial decision about whether to accept a complaint about a registrant could be undertaken by another role than the Registrar
5	6. The JCCP should include discrimination and harassment as additional matters which would be treated as very serious and likely to engage a significant sanction, within its sanctions guidance.
6	7. The JCCP should develop its organisational complaints policy setting out how it will act on concerns or complaints raised against it.
7	8. The JCCP should ensure that it maintains its own awareness of modality-based risks, to ensure that it can act to mitigate these appropriately.
8	9. The JCCP should make sure that when reviewing its websites and public information it includes a review of user journeys, informed by external perspectives where needed to improve the accessibility and clarity of information.

About the Register

This section provides an overview of the JCCP and its register.

Name of Organisation	Joint Council for Cosmetic Practitioners (JCCP)
Website	https://www.jccp.org.uk
Type of Organisation	The JCCP is a ' Private Limited Company by guarantee without share capital use of 'Limited' exemption ' (Companies House no. 10287079) and a Registered Charity (no. 1177540)
Role(s) covered	<p>The JCCP registers non-surgical cosmetic practitioners, for the following five modalities: Botulinum Toxins (BT), Dermal Fillers (DFs), Chemical Peels and Skin Rejuvenation (CPSR), Laser, Intense Pulsed Light and Light Emitting Diode. (LIPLLED).</p> <p>The JCCP registers General Medical Council (GMC) registered surgeons for Hair Restoration Surgery (HRS).</p> <p>Types of treatment within each modality are separated into the level of qualification required to include them on JCCP register entries, based on their level of risk.</p> <p>‘The JCCP Practitioner Register is divided into two parts:</p> <p>‘Part A:</p> <p>Practitioners who are registered with Professional Regulated Statutory Bodies that can provide oversight and work independently – Doctors, Dentists, Nurses, Specific Allied Health Professionals and Pharmacists (some of who will also be prescribers).</p> <p>Part B:</p> <p>Practitioners who are not in current membership with, or are not eligible to join a Professional Statutory Regulatory Body/Council and who require clinical oversight for specific procedural interventions – Beauticians, Aesthetic Practitioners and persons who are able to be registered with a PRSB but have elected not to do so.’</p>
Number of registrants	Registrant numbers as at 1 Jan 2023: 689
Overview of Governance	The JCCP is governed by its Trustee Management Board, which is comprised of the following members: the Executive Chair and Registrar, the Chair of the Practitioner Register Committee, the Chair of the Education and Training Committee, the Chair of the Clinical Advisory Group, the Chair of the Marketing and Communications Group, a nominee by the Cosmetic Practice

	Standards Authority, and nine Independent Stakeholder Trustees, two of whom are Patient Trustees.
Overview of the aims of the register	<p>The JCCP's objectives are to promote the health and safety of, and protection of the public by the development and promotion of high standards of practice among non-surgical cosmetic practitioners and hair restoration surgeons, including by (but not limited to):</p> <ul style="list-style-type: none"> • defining, creating and maintaining an effective structure to inform the standard of professional education and training amongst non-surgical cosmetic practitioners and hair restoration surgeons, including maintaining a register of approved education and training providers; • working with professional regulated statutory bodies who are engaged with non-surgical cosmetic practice to agree appropriate processes for joint working with regard to fitness to practice and Registrant conduct, informed by the standards of practice proficiency and safe practice set down by the JCCP; • advancing the study and practice of non-surgical cosmetic interventions to inform and promote safe and effective practice standards for the public; • advancing the education of the public and promoting research for the public benefit in the field of non-surgical cosmetic and hair restoration surgical treatments; • providing knowledge and advice to stakeholder bodies and organisations responsible for developing and maintaining clinical and practice-based standards for cosmetic treatments to ensure public safety; • regulation through the maintenance a voluntary register of persons who are fit to practice as non-surgical cosmetic practitioners and hair restoration surgeons, having met prescribed criteria and continuing professional development requirements; and publishing, operating and implementing a code of practice for Registrants in the interests of public protection.

Inherent risks of the practice

This section used the criteria developed as part of the Authority's *Right Touch Assurance tool*² to give an overview of the work of non-surgical cosmetic practitioners, and hair restoration surgeons.

Risk criteria	
<p>1. Scale of risk associated with non-surgical cosmetic practitioners.</p> <p><i>a. What do non-surgical cosmetic practitioners do?</i></p> <p><i>b. How many non-surgical cosmetic practitioners are there?</i></p> <p><i>c. Where do non-surgical cosmetic practitioners work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>JCCP registrants are regulated health professionals who practice 'non-surgical anti-aging treatments' and hair restoration surgery, and non-regulated aesthetic practitioners who provide similar non-surgical treatments. Such treatments are mostly elective and provided to service users on a private basis. Treatments fall under the following five 'modalities':</p> <ul style="list-style-type: none"> • Botulinum toxin injections • Dermal Fillers • Chemical peels and skin rejuvenation • Lasers, Intense Pulsed Light (IPL) and Light Emitting Diode (LED) treatments • Hair restoration surgery <p>The Register itself is split into two parts. Part A is for regulated healthcare professionals, and Part B is for non-regulated practitioners, many of whom are from a beauty background.</p>
<p>2. Means of assurance</p>	<p>The JCCP operates a public register at https://www.jccp.org.uk/MemberSearch which displays practitioners' status as a 'registered statutory healthcare practitioner' or 'registered aesthetic practitioner'. Qualifications, regulatory information and fitness to practise information are also displayed.</p> <p>JCCP registrants are subject to its Code of Practice and Fitness to Practise rules.</p>

² https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

	<p>Registrants are required to meet the JCCP's requirements for CPD, premises standards, and minimum treatment numbers. Registrants are required to provide yearly anonymised data regarding adverse incidents for statistical analysis and must comply with other appropriate reporting systems including the Medicines and Healthcare products Regulatory Agency (MHRA)'s 'Yellow Card' scheme. Registrants agree to 'provide to customers only those products that have been ethically and responsibly sourced from appropriate suppliers, including medicines and medical devices from UK approved distributors or their nominated registered pharmacies.'</p>
<p>3. About the sector in which non-surgical cosmetic practitioners operate</p>	<p>Practitioners offering non-surgical cosmetic treatments practice in commercial clinics, CQC-regulated environments, and may also practice in home settings. They are also known to practice at conferences or other venues where demonstrations may be provided. JCCP registrants' working environments must comply with JCCP's premises standards, and those of the systems regulators where appropriate.</p>
<p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in non-surgical cosmetic practitioners></i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>All non-surgical cosmetic interventions performed by JCCP registrants involve some risk of harm. The <i>Review of the Regulation of Cosmetic Interventions</i>³ highlighted that risks of physical harm exists in both 'lower' and 'higher' risk treatments: All laser and IPL treatments, for example, have the potential to cause scarring; skin melanocytes (cells that produce melanin) may be harmful and cause permanent hyper or depigmentation (unnaturally dark or light skin, loss of ability to tan). Exposure to laser irradiation may result in damage to the eye and vision, and there is a risk that clothing, hair or oxygen tubes may be ignited by high intensity laser beams.</p> <p>There are also psychological risks associated with non-surgical cosmetic treatments, and further risks including financial exploitation of people seeking to improve their appearance, and the use of unapproved or unregulated products that have not been appropriately sourced or prescribed.</p> <p>The JCCP aims to address such risks through its UK-wide register that has defined scopes of practice, standards of conduct, and which manages concerns about registrants with nationally published outcomes.</p>

3

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/192028/Review_of_the_Regulation_of_Cosmetic_Interventions.pdf

	<p>Proposals to introduce a new statutory licensing scheme for some non-surgical cosmetic procedures in England are in development. This may introduce new requirements for JCCP's practitioners. The JCCP has been actively involved in discussions about these proposals.</p>
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Assessment against the Standards

Standard 1: Eligibility and 'public interest test'

Summary

- 1.1 The Accreditation Panel found that the JCCP's register falls within the scope of the Accredited Registers programme.
- 1.2 The Accreditation Panel found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the JCCP. Such registers can provide patients with greater assurance that they will receive appropriate consultation, treatment, and follow-up care from qualified and ethical practitioners.
- 1.3 The Accreditation Panel found that Standard One was met.

Accreditation Panel findings

Standard 1a: Eligibility

- 1.4 We considered whether the JCCP's register falls under the scope of our powers of accreditation as set out in the National Health Service Reform and Health Care Professions Act 2002, making reference to the definition of a "voluntary register" set out at Section 25E.
- 1.5 The JCCP's registrants provide treatments to private patients seeking 'non-surgical anti-aging treatments', and hair restoration surgery. Patients seek treatments that they consider will enhance their overall health, and psychological and emotional wellbeing⁴.
- 1.6 The JCCP registers regulated health professionals, and non-regulated practitioners who provide similar interventions. They may work independently or be employed in clinics and other practice settings. Those settings may be required to be registered with systems regulators such as the Care Quality Commission. Registrants may work in England, Scotland, Wales and Northern Ireland.
- 1.7 The JCCP's register has been recognised, and is referred to, by numerous statutory and public bodies. This includes the Advertising Standards Authority

⁴<https://www.jccp.org.uk/ckfinder/userfiles/files/APPG%20Response%20%20Response%20to%20APPG%20.pdf>

(ASA)⁵, the General Medical Council (GMC)⁶, the Care Quality Commission, the NHS⁷, the and the UK Government.

- 1.8 We found that the JCCP's register falls within the scope of the Accredited Registers programme and meets the requirements of Standard 1a.

Standard 1b: Public interest test

i. Evidence that the activities carried out by registrants are likely to be beneficial.

- 1.9 We considered whether it is likely to be in the best interests of patients, service users and the public to accredit the JCCP's register, with consideration of the types of activities practised by its registrants.
- 1.10 Our assessment includes checks for evidence that the activities carried out by registrants are likely to be beneficial. During our assessment, we found that the research or evidence regarding the benefits of non-surgical cosmetic treatments, as a whole, was often not clearly differentiated from studies on surgical cosmetic treatments. Therefore, we included studies related to both types of treatments in our analysis to ensure a comprehensive assessment of the available evidence.
- 1.11 Authorities such as the NHS and National Institute for Health and Care Excellence (NICE) generally do not promote or endorse cosmetic treatments for aesthetic purposes, as their primary focus is on providing evidence-based medical care to patients with medical conditions. However, in some cases, they may consider nonsurgical cosmetic treatments for certain medical conditions that affect a patient's physical or psychological health. The NHS may offer botulinum toxin injections for medical conditions such as chronic migraines or excessive sweating, where the treatment has been shown to be effective in reducing symptoms and improving quality of life⁸. NICE may recommend use of similar non-absorbable gel polymers (types of dermal fillers) to treat people with HIV-related lipoatrophy (loss of fat from the skin), also with the aim of improving quality of life⁹.
- 1.12 People pursue aesthetic treatments for a variety of complex reasons, ranging from addressing perceived emotional, physical, social, and professional impairments to enhancing their overall quality of life¹⁰. They aim for treatments to have a transformative impact, helping them to feel more confident, comfortable, or satisfied with their appearance, which may in turn positively impact their psychological well-being and social interactions.

⁵ <https://www.asa.org.uk/static/f98ed219-144c-41d4-865406ffbea42487/Cosmetic-Interventions-Regulatory-statement.pdf>

⁶ https://www.gmc-uk.org/-/media/documents/gmc-response-to-scottish-government-consultation-on-cosmetic-procedures----june-2020_pdf-85288595.pdf

⁷ <https://www.nhs.uk/conditions/cosmetic-procedures/advice/choosing-who-will-do-your-procedure/>

⁸ <https://www.nice.org.uk/guidance/ta260/documents/nice-recommends-botox-for-preventing-headaches-in-adults-who-have-chronic-migraine>

⁹ <https://www.nice.org.uk/guidance/ipg439/resources/treating-hivrelated-lipoatrophy-by-injecting-a-nonabsorbable-gel-polymer-pdf-364620493>

¹⁰ <https://jamanetwork.com/journals/jamadermatology/fullarticle/2696640>

- 1.13 People may consider non-surgical treatments over elective surgical interventions, as they may be ‘minimally invasive and more cost-effective’¹¹
- 1.14 Although treatment providers may suggest that aesthetic treatments provide mental health benefits such as improved confidence, self-esteem, better quality of life, ‘and a renewed feeling of youth’¹², we found limited evidence to support these overall benefits.
- 1.15 One study however highlighted:
- ‘While society places great importance on beauty, and cultural factors inevitably influence our perception of attractiveness, several lines of research also suggest that there may be neural correlates of attractiveness. There is evidence that a preference for attractive faces emerges early in life. For example, infants look longer at attractive faces from within a week of birth before their perception has been modified by experience and adults and children within and across cultures show high rates of agreement in judgments of facial attractiveness. With attractiveness so deeply encoded in our biology, it is not surprising that with the expanding range of products for non-invasive facial rejuvenation, patient demand for cosmetic enhancements to preserve their looks is increasing, particularly in the younger generation who seek interventions at the earliest signs of aging’.
- 1.16 One 2022 literature review noted evidence suggesting that ‘satisfaction with Facial Appearance, Psychological Wellbeing, and Age Appraisal did improve following nonsurgical facial aesthetic procedures’¹³ but highlighted limitations including ‘varying follow-up times, lack of control groups, and publication bias for positive findings’.

ii. Evidence that any harms or risks likely to arise from the activities are justifiable and appropriately mitigated by the register’s requirements for registration.

- 1.17 The JCCP’s Risk Register includes practice-based risks that include:
- ‘Dishonest and unsafe use of unlicensed products
 - Acting beyond scopes of practice
 - Illegal administration of procedures to children and young persons
 - Psychological and emotional harm caused by failure to provide informed consent
 - Misrepresentation of treatment or proficiency due to misleading advertising
 - Failure of Registrant to honestly self-declare that their premises and CPPD requirements meet JCCP premises and CPSA practice standards’
- 1.18 We noted that such risks appeared to be appropriately mitigated by requirements to adhere to the JCCP’s Code of Practice and associated guidance, as well as through dedicated information campaigns by the JCCP to address specific issues.

¹¹ <https://bdnj.co.uk/2020/02/18/face-the-demand/>

¹² <https://www.acquisitionaesthetics.co.uk/the-mental-health-benefits-of-aesthetics-treatments/>

¹³ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9122280/pdf/jcad_15_5_47.pdf

- 1.19 During our assessment we noted that the perceived benefits of cosmetic treatments were likely to be high for those with realistic expectations of the value of their treatment, however such benefits were not likely to be perceived by clients with body dysmorphic disorders (BDD)¹⁴.
- 1.20 The International OCD Foundation noted that:
- ‘Cosmetic treatments for BDD rarely resolve symptoms of BDD, and in some cases, make symptoms worse, cosmetic treatments are not recommended for this disorder. Several evidence-based treatments exist for BDD that are associated with improvement in symptoms and functioning, including serotonin reuptake inhibitors (SRIs), and cognitive-behavioral therapy.’¹⁵
- 1.21 This evidence suggested the potential risks arising from the work of JCCP registrants if not equipped to identify and take appropriate action for clients with BDD. To address such risks, the JCCP Code of Practice requires its registrants to:
- ‘have enough knowledge of the patient’s health care history and needs to prescribe medicines /treatments appropriate for them and which will not compromise other aspects of their medical care or psychological wellbeing’.
- 1.22 We sought further assurance from the JCCP about how they address this risk. In response to our concerns, the JCCP has published a guidance paper for registrants on ‘Patient Emotional and Psychological Safety’¹⁶. The guidance reflects the JCCP’s ‘understanding of the vulnerable nature of many individuals seeking cosmetic procedures necessitates a renewed focus on this specific area of concern’. It proposes actions that JCCP Registrants might seek to undertake to assure themselves that someone is not experiencing Body Dysmorphic Disorder (BDD) before they undertake treatment.
- 1.23 We acknowledged the swift action taken by the JCCP to address our concern, however highlighted the importance of ensuring risks such as these are regularly reviewed.

iii. Commitment to ensuring that the treatments and services are offered in a way that does not make unproven claims or in any other way mislead the public.

- 1.24 JCCP registrants work in private settings whether independently, part of a single clinic, or as part of larger chain of non-surgical cosmetic surgery providers. This means there is scope for promotional materials, websites, or other forms of advertising, from registrants or their employers, to make unproven claims or mislead the public.
- 1.25 The JCCP requires its registrants to abide by overarching advertising standards that are set out within the JCCP Code of Practice¹⁷. Registrants must also abide by specific advertising standards for each modality. These

¹⁴ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1851945/pdf/nihms12692.pdf>

¹⁵ <https://bdd.iocdf.org/expert-opinions/cosmetic-treatments-and-bdd/>

¹⁶ https://www.jccp.org.uk/Home/Download?filename=Resource_20230328162626389.pdf

¹⁷ <https://www.jccp.org.uk/ckfinder/userfiles/files/Code%20of%20Practice%202020.pdf>

highlight, for example, that it is illegal to advertise prescription only medicines like botulinum toxins to members of the public.

- 1.26 We noted that the JCCP published a statement endorsing the principles set out in the Advertising Standards Authority's guidance on cosmetic interventions¹⁸.
- 1.27 We found that the JCCP meets parts i, ii and iii of Standard 1b. This meant that Standard One was met.

Standard Two: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Condition and Recommendations:

Condition(s):

- The JCCP must make clear that training providers are not part of the Register of practitioners that is accredited by the Authority. This should be completed within three months of publication of the Authority's decision.

Recommendation(s):

- The JCCP should publish its registration appeals process.
- The JCCP should provide clearer information about what its different membership categories mean in practice.
- The JCCP should set out how it will take into account professional conduct outcomes issued by other regulatory bodies in its own registration decisions.

Accreditation Panel findings

- 2.1 The JCCP operates a public register for practitioners providing non-surgical cosmetic treatments and hair restoration surgery (Injections, Fillers, Lasers, Peels and Hair Restoration Surgery). Registration is open to regulated healthcare professionals and to unregulated aesthetic practitioners, with different levels of registration available. Their register is published at: <https://www.jccp.org.uk/MemberSearch>
- 2.2 The JCCP's public register provides information about the registrant, professional registration, the modalities offered, details regarding the qualifications that enable them to perform these, and any sanctions in place. Each register entry links to guidance explaining the types of registration that exist.
- 2.3 We checked that the JCCP has published, accessible, registration procedures. During our assessment, we confirmed that the JCCP has a process for applicants to appeal registration decisions. The applicant may request this from the JCCP. The Accreditation Panel suggested that publishing this document would improve transparency of registration

¹⁸ <https://www.asa.org.uk/resource/cosmetic-interventions.html>

processes.

The Accreditation Panel issued the following Recommendation:

- The JCCP should publish its registration appeals process.
- 2.4 The JCCP also requires its registrants to undertake Continuing Professional Development (CPD) and self-certify their premises meet appropriate standards. The JCCP has mechanisms to assure this.
- 2.5 In our 2021/22 assessment, we had identified some concerns about accuracy of information on the Register, and issued Conditions aimed at strengthening the registration process to ensure that no registrant is entered onto the public register until all necessary checks have been completed. The Conditions were later found to have been met. In this assessment, although our checks highlighted some remaining concerns about presentation of the register, we noted that overall accuracy had improved.
- 2.6 Those issues concerned how JCCP's different categories of registration are described. The categories and types of registration (and the requirements to advance in these) may not be immediately accessible to those applying to join the register, for example there is no immediate reference to 'Full – Category Two'.
- 2.7 We noted that the JCCP has recently launched a more public-focused website (www.jccpandme.org.uk). However this appeared to be in an early stage of development and directed to the existing JCCP register, so did not address our concerns. We think this provides an opportunity to develop the user experience of the register. This is discussed further under Standard Eight.
- 2.8 The UK Government is currently developing proposals to introduce a licensing scheme within England for some procedures offered by registrants. The JCCP told us this may affect its categories, and processes for registrants to be able to move from 'Provisional' to 'Category Two' status based on their experience. The JCCP told us it is maintaining those categories whilst licensing is developed, with a view to then reviewing its categories overall. Whilst the rationale for this is understood, in the meantime it will be important for the JCCP to provide clearer information for the public about what its different categories are.

The Accreditation Panel issued the following Recommendation:

- The JCCP should provide clearer information about what its different membership categories mean in practice.
- 2.9 During the assessment, the JCCP confirmed that it will recognise professional conduct findings of other Accredited Registers when deciding whether a person should be admitted to its register. The Accreditation Panel suggested that the JCCP's guidance make clear how it will take such outcomes into account when making registration decisions.

The Accreditation Panel issued the following Recommendation:

- The JCCP should set out how it will take into account professional conduct outcomes issued by other regulatory bodies in its own registration decisions.
- 2.10 Currently, details of training providers are included in the Register of practitioners. The Authority's remit only extends to accrediting Registers of individual practitioners, (who may display the Accreditation Quality Mark) rather than education providers. The Accreditation Panel considered that the inclusion of training providers has potential to be confusing for members of the public and others. A clearer distinction should be made, either by separating the registers or through presentational means.

The Accreditation Panel issued the following Condition:

- The JCCP must make clear that training providers are not part of the Register of practitioners that is accredited by the Authority. This should be completed within three months of publication of the Authority's decision.

Standard Three: Standards for registrants

Summary

- 3.1 The Accreditation Panel found that Standard Three was met. No Conditions or Recommendations were issued, although some points identified relating to accessibility and user experience of the website relate to Standard Eight.

Accreditation Panel findings

- 3.2 The JCCP sets standards for competence, professional and ethical behaviour, and business practice. This includes its Code of Practice (JCCP and CPSA Guidance for Practitioners Who Provide Cosmetic Interventions¹⁹), Cosmetic Practice Standards Authority (CPSA) modality standards²⁰ and premises standards²¹.
- 3.3 We noted that it may be possible for applicants to miss the detailed joining guidance if they immediately click-through to the 'Join Now' link in the JCCP website's header. We suggested this information could be more clearly linked.
- i. Standards of competence
- 3.4 Specific modality standards have been developed by JCCP's independent affiliate, the Cosmetic Practice Standards Authority (CPSA) 'an expert group of specialists with patient/public representation'.²² Documents setting out what registrants can and must not do within a scope of practice are set out within the CPSA standards at: <https://www.jccp.org.uk/ThePublic/treatments>
- ii. Standards of professional behaviours
- 3.5 The JCCP sets further standards and provides guidance, for example

¹⁹ <https://www.jccp.org.uk/ckfinder/userfiles/files/Code%20of%20Practice%202020.pdf>

²⁰ <http://www.cosmeticstandards.org.uk/>

²¹

https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP_Premises_Standards_Terms_of_Reference.pdf

²² <http://www.cosmeticstandards.org.uk/>

standards for registrants prescribing medicines for non-surgical cosmetic treatment: 'At the heart of this guidance is the principle of applying safe, ethical and legal practice with respect to the prescribing, supply and administration of prescription only medicines.'²³

- 3.6 The JCCP has Safeguarding Guidelines²⁴ to assist practitioners to identify and act on concerns regarding abuse that 'may be physical, psychological, sexual, financial, material, discriminatory, or involve neglect'. Registrants are required to report 'significant issues of concern' to their Local Authority Safeguarding Officers for advice on pursuing the matter. The guidance refers to other relevant sources such as the NHS Safeguarding Policy²⁵ and Care Act 2014.²⁶
- 3.7 The Code of Practice makes clear that 'marketing activities must not target children or young people, through either their content or placement'. This is supported by the JCCP's 'Policy Statement on the Advertising and Promotion of Aesthetic Cosmetic Injectable Treatments'²⁷ which also links to relevant guidance such as the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and the UK Code of Broadcast Advertising (BCAP Code). The JCCP has also published a joint statement with the ASA highlighting that it will refer potential examples of advertising in breach of ASA Codes, and that the ASA agreed 'to be receptive to this', as they work together to encourage responsible advertising across the sector.²⁸
- 3.8 We noted that the Codes make clear that registrants are responsible for assessing a person's capacity and must refer to appropriate professionals if in doubt of capacity to make an informed decision. The JCCP requires that practitioners never treat people who have been deemed by any legal test or professional psychiatric opinion to lack the capacity to consent to treatment.

iii. Standards of business practice

- 3.9 Registrants are required to 'have a robust Complaints Policy/Procedure which includes an independent/external review stage'. Registrants are required to inform their patients/clients about these. The JCCP highlights that, for concerns that may not be appropriate for resolution by the register, patients may raise concerns through the Cosmetic Redress Scheme²⁹. If they work within a chain the client may use their organisational complaints process or refer to the Independent Sector Complaints Adjudication Service (ISCAS) if

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https://www.jccp.org.uk/ckfinder/userfiles/files/Prescribing%20Statement%20Revised%20Final_AR%20comments.pdf

²⁴ <https://www.jccp.org.uk/ckfinder/userfiles/files/Safeguarding%20Guidelines.pdf>

²⁵ <https://www.england.nhs.uk/publication/safeguarding-policy/>

²⁶ <https://www.legislation.gov.uk/ukpga/2014/23/part/1/enacted>

²⁷

<https://www.jccp.org.uk/ckfinder/userfiles/files/Policy%20Statement%20Advertising%20and%20Promotion%20of%20Aesthetic%20Cosmetic%20Injectable%20Treatments%20by%20registrants%20-statement-advertising-non-surgical-cosmetic-treat.pdf>

²⁸ <https://www.asa.org.uk/static/uploaded/7888b5d2-a4c6-4f10-8acb534a3dd46943.pdf>

²⁹ <https://www.cosmeticredress.co.uk/>

they are unable to solve the complaint.³⁰

- 3.10 The JCCP has requirements and mechanisms to check that registrants hold indemnity cover. The signed self-declaration states that registrants ‘will maintain an appropriate and proportionate level of insurance /indemnity and that you will inform JCCP of any material changes.’ The JCCP’s register team checks for current insurance at point of registration, and annual renewal.

Standard Four: Education and training

Summary

The Accreditation Panel found that Standard Four was met. It issued the following Recommendation:

Recommendation(s):

- The JCCP should make clearer to the public how it maintains confidence in the ongoing quality assurance of education training courses that must be completed to gain entry to the register.

Accreditation Panel findings

- 4.1 The JCCP publishes the register’s required level of training for specific treatments within its five general modalities.³¹ They are mapped to English Regulated Qualifications Framework (RQF) standards (or equivalent for other UK nations) based on the level of risk for each type of treatment. Standards for the modalities and level of treatment are set by the Cosmetic Standards Practice Authority (CPSA).³²
- 4.2 When the register was developed there were few recognised or nationally approved schemes for assuring qualifications or training programmes for non-surgical cosmetic treatments within the United Kingdom. For this reason, the register launched with different tiers of registration, applying to both regulated health care professionals (Part A) and un-regulated aesthetic practitioners. (Part B). The ‘Provisional’ and ‘Full – category 2’ apply to practitioners who do not yet hold the required qualifications but are working towards these, while upholding the JCCP’s standards. ‘Full – category one’ is applied to registrants who have achieved the required qualifications for their practice modalities.
- 4.3 There are two routes to ‘Full – category one’ registration: through a ‘JCCP approved provider’ or by demonstrating equivalence at an approved ‘Fast Track Assessment (FTA) centre’.
- 4.4 The JCCP has a register of approved education and training providers. Institutions wishing to become approved providers must demonstrate they meet the *Standards to enter the JCCP Education and Training Providers*

³⁰ <https://iscas.cedr.com/>

³¹ <https://www.jccp.org.uk/ThePublic/treatments>

³² <http://www.cosmeticstandards.org.uk/>

*Register*³³. JCCP approval of courses is subject to annual renewal³⁴ and concerns may be raised with it about training providers or courses³⁵. It was not clear to the Accreditation Panel however what the ongoing quality assurance process involves.

The Accreditation Panel issued the following Recommendation:

- The JCCP should make clearer to the public how it maintains confidence in the ongoing quality assurance of education training courses that must be completed to gain entry to the register.
- 4.5 The JCCP has recently introduced a new pathway to Part A Category One, for members of the British College of Aesthetic Medicine (BCAM). Registration as a doctor or dentist in the UK is required for BCAM membership³⁶. We asked how this fit within its education and training (and membership) pathways. The JCCP told us that it has worked with the BCAM to align requirements with the JCCP Level 7 standards for injectables and fillers and to ensure that the systems that BCAM put in place for examination and assessment are robust. A new Category/Field for BCAM registration has recently been added to the registrant record.
- 4.6 The JCCP has appointed an independent assessor to ensure that BCAM members met its standards. We noted however that information about BCAM admittance to Category One through membership-examination or grandparenting scheme was not available on the website at this time, although this may still be in development. We considered that the JCCP should ensure that all routes to registration are clearly presented, including registration through BCAM membership as part of the Recommendation issued for Standard Eight.
- 4.7 The Panel noted there did not appear to be a specific mechanism for managing concerns against training providers, which could affect the JCCP's quality assurance of those providers. In response to our concern, the JCCP added information about raising concerns about JCCP-approved training providers to its complaints policy. The policy makes clear that people are welcome to raise concerns and will be investigated against the JCCP's Competency Framework.

³³

<https://www.jccp.org.uk/ckfinder/userfiles/files/Education%20and%20Training%20JCCP%20Standard%20for%20ET%20providers%20V14%20September%202018.pdf>

³⁴

https://www.jccp.org.uk/ckfinder/userfiles/files/JCCP_Charging_Policy_Table_Website_September_2018_final_v2.pdf

³⁵ <https://www.jccp.org.uk/ThePublic/raising-a-concern>

³⁶ <https://bcam.ac.uk/about/default.aspx>

Standard Five: Complaints and concerns about registrants

Summary

The Accreditation Panel found that Standard Five was met. It issued the following Recommendations:

Recommendation(s):

- The JCCP should review whether the initial decision about whether to accept a complaint about a registrant could be undertaken by another role than the Registrar.
- The JCCP should include discrimination and harassment as additional matters which would be treated as very serious and likely to engage a significant sanction, within its sanctions guidance.

Accreditation Panel findings

- 5.1 The JCCP's website invites the public to raise any concern they may have about an aesthetic practitioner, including if they are not confirmed to be JCCP registrants. The JCCP also requires registrants to have their own complaints procedures, or to link to third party redress schemes, but will not turn away concerns that have not yet been considered under these. The JCCP will provide support to individual complainants and can also provide support for complainants appearing as witnesses at hearings.
- 5.2 The JCCP's disciplinary procedures are set out within its Fitness to Practise (FTP) Rules (March 2018)³⁷. This process consists of:
1. A determination that the process concerns fitness to practise, by the JCCP Registrar.
 2. An investigation by Case Examiners, and by an Investigation Panel if required.
 3. Interim Orders may be issued by a separate panel as required.
 4. An FTP hearing panel, with a lay Chair.
 5. Appeals Panels, and Admissions & Restoration Panels following an FTP sanction.
- 5.3 The FTP rules have clear thresholds for escalation of concerns. There is also a process for all parties to appeal outcomes.
- 5.4 The JCCP's Executive Chair, who is the Registrar, will initially determine if a complaint concerns a potential impairment of a registrant's fitness to practise and refers to Case Examiners. They may also refer to an Interim Orders Panel. The Accreditation Panel considered whether this met the Minimum Requirements as set out in the [Standards for Accredited Registers: Evidence Framework](#), which include that 'Decision making about complaints is separate from governance Boards, Committees and the Chief Executive (or equivalent).'

³⁷ The 2018 [JCCP FtP Rules-Final1Mar18.pdf](#) were in place at time of assessment.

- 5.5 The Accreditation Panel considered that the Registrar's role is to determine whether a complaint is within the scope of the Register's complaints processes, and whether it could present a significant risk of harm that warrants further consideration by an Interim Orders Panel. We saw no evidence that the Registrar is involved in determining outcomes or adjudication, later in the process. Given the JCCP's staff size, and the fact that it has clear and robust policies setting out how decisions will be made and how all parties can appeal, the Accreditation Panel agreed this did not affect whether JCCP met Standard Five.
- 5.6 However, the Accreditation Panel considered that the JCCP should review whether the Registrar needs to be involved at all at this early stage. This would also provide continuity and agility should the Registrar not be available. It also recommended to the Accreditation Team that the *Standards for Accredited Registers: Evidence Framework* is revised to be clearer about what level of involvement in complaints by the Chief Executive, Chair or equivalent would constitute a concern.

The Accreditation Panel issued the following Recommendation:

- The JCCP should review whether the initial decision about whether to accept a complaint about a registrant could be undertaken by another role than the Registrar.
- 5.7 The JCCP has Memoranda of Understanding (MOUs) with the relevant statutory regulators for the health care professionals it registers, setting out that it will convey any concern that may be within the remit of those bodies. We also noted that it was not apparent if the JCCP had signed up to or followed the principles of the Accredited Registers Information Sharing Protocol³⁸. The JCCP confirmed it follows the protocol and would provide a link to this alongside its MOUs. The protocol was under revision at time of assessment.
- 5.8 The JCCP Code of Practice demonstrated awareness of registrants' safeguarding responsibilities including where concerns should be reported to local Safeguarding Officers. The Panel highlighted that the JCCP should ensure its own internal policies about receiving safeguarding concerns, or other matters that may require contacting the police or other authorities, would work in practice.
- 5.9 The Accreditation Panel noted that the JCCP's guidance on sanctions appeared comprehensive overall. However, it did not include discrimination or harassment as matters that would be treated as serious and likely to engage a significant sanction.

The Accreditation Panel issued the following Recommendation:

- The JCCP should include discrimination and harassment as additional matters which would be treated as very serious and likely to engage a significant sanction, within its sanctions guidance.

³⁸ <https://www.bacp.co.uk/media/2475/accredited-registers-information-sharing-protocol.pdf>

Standard Six: Governance

Summary

The Accreditation Panel found that Standard Six was met. It issued the following Recommendation:

Recommendations:

- The JCCP should develop its organisational complaints policy setting out how it will act on concerns or complaints raised against it.

Accreditation Panel findings

- 6.1 The JCCP is a registered charity and Private Limited Company, run by its Board of Trustees under its Executive Chair, and including lay membership. The Board is supported by committees and groups responsible for key functions such as education & training, and complaints management. The JCCP is also supported by its Stakeholder Council which provides advice from all sectors of the industry including service users, the statutory regulators and industry representatives. These are defined and supported by, for example, its Articles of Association, corporate risk registers, terms of reference for key positions, and service agreements with its register administrators.
- 6.2 The JCCP demonstrates transparency through, for example, its published minutes, annual accounts and membership of its Board of Trustees. Following our assessment the JCCP published 'pen portraits' of its Board members on its website, which could help build confidence in the leadership of the register. The JCCP has also recently published its complete Constitution, and Terms of Reference for all of its Committees, and other new information.
- 6.3 We checked there is a way for anyone to raise a concern or complaint about the Accredited Register. The JCCP informed us that such complaints would be investigated by its Complaints Management Group and reported to the Board, however it was not clear if there was a set process in place, and accessible to the public. The JCCP has recently amended its complaints policy to make clear that concerns related to the JCCP are the responsibility of its Executive Chair and Registrar. The Accreditation Panel considered that it is good practice to provide further information on how such complaints will be managed, including details of timescales and any appeals procedures.

The Accreditation Panel issued the following Recommendation:

- The JCCP should develop its organisational complaints policy setting out how it will act on concerns or complaints raised against it.
- 6.4 The JCCP's commitment to equality, diversity and inclusion (EDI) is set out within a published statement on its website³⁹. Its position is set out within other documents such as within its Board recruitment materials.

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<https://www.jccp.org.uk/ckfinder/userfiles/files/Equality%20Diversity%20Inclusivity%20%20Policy%20V2.pdf>

Standard Seven: Management of the risks arising from the activities of registrants

Summary

The Accreditation Panel found that Standard Seven was met. It issued the following Recommendations:

Recommendations(s):

- The JCCP should ensure that it maintains its own awareness of modality-based risks, to ensure that it can act to mitigate these appropriately.

Accreditation Panel findings

- 7.1 The JCCP maintains a risk register, which is reviewed at JCCP Board of Trustee meetings. The JCCP's risk management approach was developed to address concerns raised in the HEE's *Report on the implementation of qualification prerequisites for cosmetic procedures, including non-surgical cosmetic interventions and hair restoration surgery*.⁴⁰ Those risks to patients are addressed in its risk register, standards, guidance, and public campaigns.
- 7.2 Specific risks relating to the five modalities, and mitigations against these, are detailed within the CPSA Standards. While the JCCP and the CPSA work closely, we did not see evidence that the JCCP maintains its own database of such risks, that can be added to or modified as risks are added, or adjusted.

The Accreditation Panel issued the following Recommendation:

- The JCCP should ensure that it maintains its own awareness of modality-based risks, to ensure that it can act to mitigate these appropriately.
- 7.3 The Accreditation Panel noted that procedures performed by JCCP's registrants put them in close contact with people who are potentially vulnerable. The JCCP had previously offered guidance on boundary violations. In addition, it recently added risks relating to boundary violations and safeguarding to their risk register, and has added explicit standards and supporting guidance into its Code of Practise⁴¹.
- 7.4 As noted in Standard One, our evidence review emphasized the necessity for practitioners to identify and provide suitable care or direction to patients who might suffer from Body Dysmorphic Disorder (BDD). Improper treatment could exacerbate this condition. The JCCP published specific guidance for registrants on BDD in March 2023.

Standard Eight: Communications and engagement

Summary

The Accreditation Panel found that Standard Eight was met. It issued the following

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<https://www.hee.nhs.uk/sites/default/files/documents/HEE%20Cosmetic%20publication%20part%20two.pdf>

⁴¹ <https://www.jccp.org.uk/PractitionersAndClinics/jccp-cpsa-code-of-practice>

Recommendation:

Recommendation(s):

- The JCCP should make sure that when reviewing its websites and public information it includes a review of user journeys, informed by external perspectives where needed to improve the accessibility and clarity of information.

Accreditation Panel findings

- 8.1 The Accreditation Panel noted that the JCCP appears to collaborate with other stakeholders in the wider environment to a high degree, with the aim of raising standards in the industry overall. It has been actively involved in the development of the Government's proposals for licensing for cosmetic procedures in England.
- 8.2 However, its website was difficult to navigate. As highlighted under other Standards, descriptors for membership categories and routes to registration are not always clear. During our review we found multiple instances of broken links, and other accessibility issues on its own websites, and the CPSA's. Wording in general did not appear to be in plain and clear language. These issues extended to its newer, separate site aimed at the public, which linked back to the original. The JCCP told us of corrections made and its ongoing plans to improve its websites.
- 8.3 Although these issues were not fundamental to the Standards now, if current work underway to update the websites is not used as an opportunity to address them, they may affect whether the JCCP meets this Standard in the future. The Accreditation Panel suggested that the JCCP obtains external user perspectives and considers basic accessibility requirements. The JCCP should not delay this work because of proposals for licensing in England since these are at an early stage. The JCCP is a UK-wide register, and it will need to make sure that any future differences in requirements for registrants at a national level, are equally well communicated. Making sure it has clear information now will provide a firmer foundation for this.

The Accreditation Panel issued the following Recommendation:

- The JCCP should make sure that when reviewing its websites and public information it includes a review of user journeys, informed by external perspectives where needed to improve the accessibility and clarity of information.

Share your experience

- 9.1 We did not receive any responses to the invitation to share experience of the JCCP.

Impact assessment (including Equalities impact)

- 10.1 We carried out an impact assessment⁴² as part of our decision to renew accreditation of the JCCP. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.
- 10.2 The JCCP advised it 'reviews the ethnicity status and diversity status of its registrants' but we are not sure of the mechanism that enables it to do so. The JCCP application process itself does not require practitioners to provide data on protected characteristics or other information that may help identify impacts on its registrants. The Authority's proposed EDI standard may require the JCCP to start collecting registrant information to assess such impacts if no specific mechanism is in place.
- 10.3 During our review, we did not find any evidence of potential negative or adverse impact on any of the protected characteristics as a result of JCCP's policies. However, in order to ensure that their policies are effective and equitable the JCCP could collect and analyse public data on these characteristics in relation to nonsurgical cosmetic treatments. This would allow for a more thorough understanding of any potential disparities or barriers that may exist, and would help to inform ongoing efforts to promote equality, diversity, and inclusion in the industry.

⁴² <https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/230512-JCCP-Full-renewal--impact-assessment.pdf>