

Annual review of accreditation 2020/21

The Joint Council for Cosmetic Practitioners
(JCCP)

May 2021

Contents

Background.....	3
Outcome.....	4
Assessment against the Standards for Accredited Registers.....	5
Share your experience	11
Impact assessment	13
Equality duty under the Equality Act 2010.....	14

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, 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 healthcare 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 their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of March 2021, there were 291 registrants on the JCCP's register.

The JCCP was first accredited on 6 April 2018. This is the JCCP's third annual review, and this report covers 6 April 2020 to 5 April 2021.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can issue Recommendations.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal.

Outcome

Accreditation for the JCCP was renewed for the period of 6 April 2021 to 5 April 2022.

Accreditation was renewed by a Panel following a targeted review of Standards 4, 5, and 10. The review considered evidence gathered by the Accreditation team and supplied by the JCCP.

Accreditation was renewed with the following Conditions:

1. The JCCP must ensure that no registrant is entered onto the public register until all necessary registration checks have been completed. Evidence of processes and checks in place to ensure this must be provided to the Authority three months after publication of this report. (paragraph 10.13)
2. The JCCP must provide a report on the outcomes of its regular audits of the accuracy of its register to the Authority three months after publication of this report. This report should include information about any issues identified and actions taken to address. (paragraph 10.14)

The following Recommendations were issued to be implemented by submission of annual renewal documentation:

1. The JCCP should publish clear definitions for its registration categories, setting out the remit of each category and why the public should have confidence in choosing any registrant. This should be made easily accessible, such as at the top of search results on JCCP's register webpages. (paragraph 10.5)
2. The JCCP should review its external communications to ensure it is clear that participation within its Insurance Provider Partnership scheme does not automatically confer entitlement to registration. (paragraph 10.16)

The following report provides detail on how this outcome was reached.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 The JCCP's registrant base had increased from 83 at the previous annual review of accreditation to 291 registrants at the time of assessment.
- 1.2 The JCCP's register is separated into two parts. It admits regulated healthcare professionals who are registered with a statutory regulator as 'Part A' registrants and unregulated aesthetic practitioners as 'Part B' registrants. All registrants appear on the register as 'provisional' until evidence can be produced to confirm that each Registrant conforms fully with the JCCP practitioner entrance requirements and provides evidence of competence and proficiency as set within [Cosmetic Practice Standards Authority \(CPSA\) and JCCP standards](#).
- 1.3 In 2018 the Authority had accepted the JCCP's Notification of Change to launch an interim scheme to admit experienced, regulated professionals as 'full registrants', prior to an assessment about whether they meet the JCCP's standards of education and training.
- 1.4 To ensure JCCP's categories of registration were made clear to the public, 'Part A' was divided into two subcategories (Full – Category One and Full – Category Two) which is displayed on register entries. 'Full – Category Two' registrants, admitted under the interim scheme, would have two years to attend JCCP assessment centres and demonstrate meeting the education and training standards. Those that could not demonstrate 'Full – Category One' status through this route would subsequently be removed from the register.
- 1.5 The Authority had required the JCCP's assurance that it would launch Full – Category Two as an interim process only. As soon as 'accreditation of prior learning' (APL) assessment was available, a cut-off date was to be announced from when no further Full – Category Two registrants would be admitted. The JCCP had previously requested that Part A – Category Two be extended to 31 January 2022, due to the impact of the Covid-19 pandemic. The Authority had noted that due to the extenuating circumstances caused by the Covid-19 pandemic, the extension of Part A – Category Two was reasonable.
- 1.6 The JCCP reported that many new registrants had been admitted through its [Insurance Provider Partnership scheme](#), which was introduced in 2020. The scheme allows insurance providers to offer their policy holders wishing to register with JCCP a reduced cost and streamlined registration process. The JCCP had advised this aimed to encourage practitioners to join the register without compromising its standards or introducing conflicts of interest.
- 1.7 At the previous annual review, the Authority issued a Recommendation for the JCCP to report on its pilot of the scheme to demonstrate its impact on registration. The JCCP had reported that its Trustee Board had decided to

formally adopt the scheme, having assured ‘that there had not been any reduction or compromise to the JCCP standards on entry to the Register with regard to any applicant who had been admitted to the JCCP Practitioner Register through this incentivised route.’ The JCCP published information about its [JCCP Insurance Provider Partnership](#), including how it will manage potential or perceived conflicts of interest relating to this scheme, on its website in August 2020.

- 1.8 The Authority found that the Recommendation had been considered. The Authority noted that the JCCP should ensure that its relationship with insurance providers allowed for notification of claims that could relate to the JCCP’s standards and should be addressed through its disciplinary processes.
- 1.9 During the assessment, concerns were raised about the checks performed on registrants admitted through the Insurance Provider Partnership scheme. The Authority considered this and related matters under Standard 10 as part of the targeted review.
- 1.10 The Authority found that the Standard continues to be met.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 The Authority noted the JCCP’s 2020-2021 annual report stated that it ‘remained most active during the 2020 Covid-19 pandemic ‘lockdown’ period and engaged regularly with ‘UK Government agencies, Professional Statutory Regulatory Bodies, Insurance Companies and Professional Organisations in order to determine and publish guidelines on how to work safely, ethically, professionally and legally during this period in the context of ‘lockdown’ restrictions.’
- 2.2 The JCCP had produced and [updated its guidance](#) for ‘cosmetic practitioners to ensure that they comply with patient safety and public protection standards required by both UK statutory professional and voluntary registers’. The JCCP advised such guidance was used in the formulation of government advice and had been used by relevant stakeholders in the aesthetics sector.
- 2.3 The JCCP reported it had developed its ‘Part B’ register for non-regulated aesthetic practitioners and worked with Habia, Skills Active, the British Beauty Council and with the British Association of Beauty Therapy & Cosmetology (BABTAC) ‘with the aim of promoting excellence in practice and education for the beauty therapy sector for treatments, other than those relating to injectables or dermal fillers’.
- 2.4 The JCCP reported that in October 2020 it had met with ‘with key insurance providers to confirm the need for mandatory insurance for all practitioners who provide non-surgical procedures to members of the public.’
- 2.5 The JCCP reported on its new [Clinical Advisory Group](#) which aims to ‘collaborate to develop best practice guidelines in the sourcing, supply and administration of dermal fillers for all practitioners’. The group had campaigned to ‘promote the need for all dermal fillers to be classified as ‘prescription only devices’ (in the interest of public protection and patient safety).’

- 2.6 The JCCP also reported it had conducted ‘mystery shopper’ actions taken to check whether training providers were offering ‘injectables’ training to ‘Part B’ aesthetic practitioners. The JCCP’s register restricts such practices to ‘Part A’ statutorily regulated professionals.
- 2.7 The JCCP reported it had made multiple referrals to the Advertising Standards Authority (ASA) regarding inaccurate or exaggerated advertising claims made by aesthetic training providers. This had resulted in the ASA issuing enforcement notices.
- 2.8 The JCCP reported it had signed an MOU with the Royal Society of Public Health to ‘work together to promote public protection and consumer safety in the aesthetic industry and to encourage positive engagement between the two organizations towards the promotion of examples of best and safe practice within the aesthetic beauty industry.’
- 2.9 The JCCP reported that it endorsed guidelines on Operating Department Practice (ODP) standards in aesthetics, by the College of Operating Department Practitioners. The guidelines supplement the core standards set by the HCPC, the statutory regulator for ODPs.
- 2.10 The Authority found that the Standard continues to be met.

Standard 3: risk management

- 3.1 The JCCP’s practitioner risk matrix had not changed following its previous annual review of accreditation. The JCCP highlighted that it had previously updated its risk registers to reflect actions to mitigate risks related to the Covid-19 pandemic. This included published statements that all aesthetic procedures should be practised in accordance with Healthcare Improvement Scotland and Public Health England advice on health protection, patient safety, risk assessment and management, social distancing and Personal Protective Equipment (PPE).
- 3.2 The JCCP provided its corporate risk register highlighting mitigating actions for risks relevant to the Standards for Accredited Registers, including financial sustainability, appropriate verification of applications to the register, and misuse of JCCP’s branding.
- 3.3 The Authority found that the Standard continues to be met.

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

- 4.1 As part of its due diligence, the Accreditation team reviewed the most recent published records from Companies House and the Charity Commission (to 31 December 2019) and noted the JCCP appeared to be financially sustainable.
- 4.2 The Authority noted that the JCCP’s Insurance Provider Partnership scheme had resulted in a significant number of new registrants and that could assist sustainability of the register.
- 4.3 The JCCP’s register is administered by a third-party that provides its service on a pro-bono basis. The Authority considered whether reliance on such

services could impact on JCCP's ability to fulfil its register functions under Standard 10 as part of its targeted review.

4.4 The Authority found that the Standard continues to be met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

5.1 The Authority noted positively that the JCCP had renewed its MOUs with the General Medical Council (GMC), the General Dental Council (GDC), the Nursing and Midwifery Council (NMC) and with the General Pharmaceutical Council (GPhC) to assure communication of fitness to practise related matters. The JCCP also reported its formal agreement with the Health and Care Professions Council (HCPC) and that it had 'established formal contact' with the Pharmaceutical Society for Northern Ireland (PSNI). The JCCP's MOUs with the health professions regulators and other stakeholders were published on the [JCCP website](#).

5.2 JCCP's 2020-2021 annual report stated that this year it had:

'focused attention on matters relating to cultural diversity and the celebration of difference. The importance of recognising that persons of colour present with specific skin related treatment requirements has been formally acknowledged. The JCCP hosted a seminar in December 2020 for all Trustees that focussed on BAME issues. The seminar was presented and facilitated by Karen Bonner, Chief Nurse from Buckinghamshire Hospitals NHS Trust and member of the NHS Diversity and Equality Task Force.'

5.3 The Authority noted actions resulting from this seminar, discussed in its November Board of Trustees Meeting minutes, that the JCCP was to review its website imagery, and that the JCCP committed to 'reviewing how it ensures equality, diversity and inclusion across all of its activities, communications and governance.'

5.4 The Authority considered whether reliance on third-party services could impact on JCCP's ability to fulfil its register functions under Standard 10 as part of its targeted review.

5.5 The Authority found that the Standard continues to be met.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

6.1 The JCCP reported that it had worked with its 'data analytical partner Northgate Public Services' to develop services for registrants to 'upload data to evidence performance over the previous year and for the subsequent analysis to be made available to clinical experts from CPSA, who ensure whether or not their standards are being adhered to'.

6.2 The JCCP reported that it worked with Skills Active and Habia to align revised National Occupational Standards in Beauty and Aesthetics to the to the JCCP Competency Framework for Cosmetic Practice.

- 6.3 The JCCP reported it had worked with the College of General Dentistry with the aim of co-designing a postgraduate qualification in aesthetic dentistry.
- 6.4 The Authority found that the Standard continues to be met.

Standard 7: Governance

- 7.1 The Authority noted from the JCCP's 2020-2021 annual report that its revenue streams had not yet provided for recruitment of a permanent Chief Executive Officer. The Authority noted continued provision of pro-bono services to JCCP, such as the JCCP's Chair continuing to act as Executive Chair, the management of JCCP's register website, and its legal support.
- 7.2 The JCCP reported it had established a new Policy, Resources and IT Committee, chaired by an independent Trustee.
- 7.3 The JCCP published its Data Protection Policy in November 2020, advising how it will 'collect personal information about people with whom it deals in order to carry out its business and provide its services'. The JCCP also created a Privacy Notice advising how JCCP collects and processes personal data through use of the JCCP website. It outlines users' legal rights and advises how complaints may be raised with the Information Commissioner's Office (ICO).
- 7.4 The Authority had previously noted that the JCCP's register website could better communicate its functions to the public. The JCCP reported it had aimed to launch its new website in Spring 2021 however this had been postponed due to the Covid-19 pandemic and development would start in April 2021. The Authority will check communication of the register to patients and the public when the new website is launched.
- 7.5 JCCP reported it continued to promote four public safety campaigns designed to have a positive impact on patient safety and public protection: Safe products and safe suppliers, Education and Training, Promoting Positive Wellbeing and Mental Health and Aesthetics and Safety in Beauty.
- 7.6 JCCP's 2020-2021 Annual Report noted successful engagement with the public, and practitioners, through its social media channels. The JCCP reported its Trustee Board members had appeared on 20 radio broadcasts and 12 podcasts.
- 7.7 The Authority noted JCCP's Trustee Board continues to include two 'Patient/User' members, as well as function leads, committee chairs, members representing registrant professions, and non-voting industry representatives.
- 7.8 JCCP reported that it had aimed to encourage 'responsible advertising and promotion of services to consumers, including the use of appropriate social media channels'.
- 7.9 JCCP advised that its Practitioner Register Committee published two Practitioner Newsletters during 2020 advising registrants of its Register annual renewal process, sampling requirements and up to date safe practice arrangements regarding the Covid-19 pandemic.
- 7.10 The Authority found that the Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 The JCCP's annual report noted that recently published National Occupational Standards for the beauty and aesthetic sector complied with and were mapped to the JCCP Competency Framework (2018) and CPSA standards.
- 8.2 The JCCP reported that its complaints procedures had been externally reviewed and found to be fit for purpose.
- 8.3 The Authority noted that the JCCP had published its updated [JCCP/CPSA Code of Practice](#) in May 2020.
- 8.4 The JCCP's decision to restrict access to its 'Level 7 practitioner register for Injectable Toxins and Fillers to suitably trained and qualified (regulated) Health Care Professionals only' (to Part A of its practitioner register) will next be reviewed by its Board in August 2022. The JCCP's statement about its decision to maintain restriction of this practice for its registrants is available on its website.
- 8.5 The JCCP advised it had positive responses from the CPD accreditation bodies it had requested only accredit aesthetics courses that meet national standards, and that they check the insurance status of course participants.
- 8.6 The Authority found that the Standard continues to be met.

Standard 9: education and training

- 9.1 The JCCP reported that its Education and Training Committee received applications from Scottish Qualifications Authority (SQA) and Ofqual regulated Awarding Organisations, and provider training organisations, to enter JCCP's Register of Approved Education and Training Providers.
- 9.2 The Authority noted the JCCP's 2020-2021 annual report stated that it had 'agreed that work should commence in 2021 to explore whether an apprenticeship route could be approved by the Council as an alternative educational route for both aspiring health care professional and non-professionally registered healthcare practitioners.' The Authority will check for updates on this in due course.
- 9.3 The Authority found that the Standard continues to be met.

Standard 10: management of the register

- 10.1 The Authority had considered the JCCP's approach to the Covid-19 pandemic at its previous annual review. The Authority checked recently published updates which included an advisory notice to practitioners on [a potential reaction between dermal fillers and Coronavirus vaccine](#) and its [Preparing Your Place of Work](#) guidance to assist practitioners to adopt best practice when returning to work following the end of lockdowns.
- 10.2 The JCCP reported on plans to launch its Fast-Track Assessment (FTA) Process for cosmetic practitioners. This would allow existing practitioners who did not hold accredited qualifications to be quickly assessed as meeting JCCP's standards for registration. The JCCP's 2020-2021 annual report noted that due to the Covid-19 pandemic its first FTA centre would open in 2021.

- 10.3 The JCCP reported that its sample checking of registrants' CPD submissions was postponed due to the Covid-19 pandemic and that these would be undertaken during the first quarter of 2021. The JCCP reported that supervision requirements had been added to its registrant sampling process.
- 10.4 At the previous annual review, the Authority had queried the meaning of registrants listed on the public register as 'run off'. The JCCP advised that it meant that the registrant had passed their renewal of registration date and had 28 days to renew before lapsing registration. The Authority issued a Recommendation for the JCCP to consider how it can ensure its registration status descriptors are made clear to those accessing the register. The JCCP advised it agreed that terms such as 'run off' could be confusing to the public and has removed this descriptor from its public register. [Descriptors of register categories](#) can be accessed from individual register entries.
- 10.5 The Authority noted the removal of the term 'run off' however considered that the published descriptors could remain difficult to understand by the general public. Those accessing the register might not be able to easily tell the benefits of choosing one category of registrant over another, or whether they could have confidence in selecting a practitioner from any category. The Authority issued a new Recommendation for JCCP to produce clear definitions for the public about the different registration categories, setting out the remit of each category and why the public should have confidence in choosing any registrant. This should be made easily accessible, such as at the top of search results on the JCCP's register webpages. The Authority suggested the JCCP have these definitions tested as being 'plain English' by a relevant organisation or service users. The Authority requested an update on this within three months of publication of this report. (Recommendation One)
- 10.6 At the previous annual review, the Authority had noted inaccuracies on the JCCP's register. The Authority issued a Recommendation for the JCCP to consider how it could better ensure the accuracy and reduce risk of errors on the public register. The JCCP reported that this had been raised with its Practitioner Register Committee (PRC) and that it had consulted with the Register Management Team at HF Resolution Limited (HFR), the company which administers the register. The JCCP advised that the PRC's Chair, and a lay Trustee would review the accuracy of published registration data prior to each PRC meeting.
- 10.7 The Authority noted that despite the JCCP's actions to address the issue, register checks undertaken during the assessment still found errors. This highlighted further errors within published details, for example a registrant whose listed qualification did not appear to meet the required standards for the modalities listed as practised.
- 10.8 The Authority noted that HFR administers the register on a 'pro bono' basis. The JCCP had provided information about how HFR maintained the register and ensured that applications through the scheme were appropriately processed. The Authority also noted the JCCP had partnered with an affiliated body, Hamilton Fraser Cosmetic Insurance (HFCI), to pilot its Insurance Provider Partnership scheme, as discussed under Standard One.

- 10.9 Noting that part of the registration process was therefore delegated to other bodies, the Authority sought further information through a Targeted Review to ascertain:
- a) Whether actions by JCCP taken since the last review to ensure ongoing accuracy of the register are sufficient.
 - b) Whether arrangements between JCCP and HFR allowed issues regarding accuracy of the register, and any further which could affect JCCP's ability to uphold the Standards, to be identified and addressed in a timely way.
- 10.10 The Authority considered JCCP's response which set out:
- a) the service agreements between the JCCP and its providers,
 - b) how the JCCP had identified and addressed the root causes for errors recently found,
 - c) the JCCP's audit systems to ensure accuracy of its register,
 - d) the JCCP's process for how complex applications are escalated from HFR to the JCCP where required, and
 - e) the application process for practitioners applying through the Insurance Provider Partnership scheme.
- 10.11 From this information the Authority noted that some registrants may have been admitted to the register in the 'provisional' category prior to having submitted all information required, for example details of registration with a statutory health and care regulator. The Authority considered this could lead to misunderstanding the purpose of the 'provisional' registrant category.
- 10.12 The Authority considered that although JCCP had recently identified further steps to enhance the registration process and its audit of the register, it needed to have a more direct role in ensuring that registrants are only admitted to the register once the necessary checks that they meet its requirements have taken place.
- 10.13 Consequently, the Authority issued a Condition for the JCCP to ensure that no registrant is entered onto the public register until all necessary registration checks have been completed. The Authority required evidence of checks carried out to assure this occurs within three months after publication of this report. (Condition One)
- 10.14 The Authority also issued a Condition for the JCCP to provide a report on the outcomes of its regular audits of its register to the Authority three months after publication of this report. This report should include information about any issues identified and actions taken to address. (Condition Two)
- 10.15 The Authority noted the actions taken to manage a perceived conflict of interest that applicants applying for registrant through the Insurance Provider Partnership scheme may be subject to lower standards. The Authority noted that the JCCP had published its [JCCP Insurance Provider Partnership Proposal Frequently Asked Questions](#) which stated:
- 'Regardless of the elected registration route; through insurance provider or traditional sign up, all registrants will be expected to read, understand and abide by the Council's overarching principles, modality

standards, education standards, supervision requirements, prescribing and premises stipulations and of course the JCCP/CPSA Code of Practice.’

- 10.16 The Authority however noted messages from HFI stating it would [‘be offering its new policy holders a free year of membership with the JCCP’](#) which could imply that applicants would be admitted to the JCCP register, as maintained by HFR, without meeting all JCCP’s standards. The Authority issued a Recommendation for JCCP to review their external communications to ensure there is no perception of conflicts of interest to suggest that taking part in the insurance scheme confers entitlement to registration. (Recommendation Two)
- 10.17 The Authority found that the Standard continues to be met subject to the Conditions being met within the set timeframe.

Standard 11: complaints and concerns handling

- 11.1 The JCCP reported that it had received no complaints about registrants that led to formal investigation. The JCCP had received concerns about non-registrants’ practice and about exaggerated or misleading claims about training courses. The JCCP reported it taken these seriously and referred complainants to seek resolution with relevant organisations.
- 11.2 The JCCP reported it had collaborated regularly with statutory health regulators to provide advice and reports relating to non-JCCP practitioners being investigated for potential Fitness to Practice matters within the aesthetics sector.
- 11.3 JCCP advised that it had appointed and trained additional members to its Fitness to Practise and Complaints Panels.
- 11.4 The Authority found that the Standard continues to be met.

Share your experience

- 12.1 The Authority received two ‘Share Your Experience’ responses within the assessment period.
- 12.2 The first response was from an aesthetics professional body who provided a positive response about the JCCP’s approach to health and safety, risk assessments, GDPR matters and its approachability for general issues of discussion.
- 12.3 The second response raised concerns about the operation of JCCP’s register. Themes raised were addressed within the above Standards.

Impact assessment

- 13.1 The Authority took account of the impacts on different groups when making its decision to reaccredit.
- 13.2 The Authority noted that potential confusion about categories on JCCP’s register may prevent some groups with protected characteristics from easily accessing information about registration and being able to make informed decisions. To address this, the Authority issued Recommendation One.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.
- 14.2 The Authority noted that the JCCP had highlighted that it had focused attention on 'matters relating to cultural diversity and the celebration of difference. The importance of recognising that persons of colour present with specific skin related treatment requirements has been formally acknowledged. The JCCP hosted a seminar in December 2020 for all Trustees that focussed on BAME issues.