

Annual review of accreditation 2019/20

Save Face

February 2021

Contents

Background	3
Outcome.....	4
Assessment against the Standards for Accredited Registers	5
Share your experience	11
Impact assessment.....	12
Equality duty under the Equality Act 2010	12

About Save Face

Save Face registers:

- Dentists, Doctors, Midwives, Nurses and Prescribing Pharmacists who provide non-surgical cosmetic treatments within private clinics that it has accredited, throughout the United Kingdom.

Its work includes:

- Setting and maintaining standards of practice 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 September 2020, there were 828 registrants on Save Face's register.

Save Face was first accredited on 11 July 2016. This is Save Face's fourth annual review, and this report covers the period 7 December 2019 to 7 December 2020.

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 Save Face was renewed for the period of 7 December 2020 to 7 December 2021.

Accreditation was renewed by a Moderator following a review of evidence gathered by the Accreditation team and supplied by Save Face.

No Conditions were issued.

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

1. Save Face should consider its approach to transparency when developing its new website and register. This should include its approach to publication of ratings, and its promotion of the Accredited Registers quality mark. (paragraph 5.8)
2. Save Face should make clear within its internal and external complaints processes how it will act on concerns which involve external bodies such as the police or statutory regulators. (paragraph 11.6)

The following report provides detail supporting the outcome.

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 There were no significant changes reported or noted in the past year. Save Face's register had increased from 572 to 828 registrants.
- 1.2 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 that Save Face continued to demonstrate its commitment to protect the public, through its media campaigns and learning from concerns raised, as discussed under Standards 3, 7 and 11.
- 2.2 Save Face's responses to the Covid-19 pandemic, including specific standards set and guidance provided for registrants, are discussed under Standards 8 and 10.
- 2.3 The Authority found that the Standard continues to be met.

Standard 3: risk management

- 3.1 The Authority checked Save Face's updated risk matrix and noted active management of risks. Save Face had recorded risks relating to the Covid-19 pandemic which resulted in the development of operational protocols to address these. Save Face also developed tools to assure safe practice for registrants working in home environments (see Standard 8) and addressed a need to assess and qualify registrants' competence (see Standard 9).
- 3.2 At its previous annual review, the Authority asked if Save Face had policies for responding to safeguarding concerns. Save Face had documented its policy for disclosing information to relevant authorities, in line with relevant legislation. In line with decisions for other Accredited Registers and to help assure that registers are aware of routes of referral where safeguarding matters are raised (subject to statutory duties or otherwise), Save Face was issued a Recommendation to review its safeguarding procedures to ensure clarity for the benefit of its staff.
- 3.3 Save Face advised that it had considered safeguarding matters relating to its register, registrants, and their patients. Save Face was aware of its statutory duties and where it could not report concerns without consent. Where safeguarding risks were suspected, or disclosed, the individual reporting these would be referred to a Save Face Director. The Director would signpost to relevant resources or offer to contact emergency services if an immediate risk of danger was identified. The Authority found that the Recommendation had been considered.
- 3.4 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 There were no significant changes reported or noted in the past year. As part of its due diligence, the Accreditation team reviewed currently published records from Companies House (to 30 September 2019) and noted Save Face appeared to be financially sustainable.
- 4.2 The Authority noted Save Face's significant increase of registrants and high retention of registrants could assist sustainability of the register.
- 4.3 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 At the previous annual review the Authority had issued a Recommendation for Save Face to publish summaries of matters in the public interest or related to public protection, discussed at the meetings of its Advisory Board. This could further demonstrate Save Face's approach to openness and transparency.
- 5.2 Save Face confirmed it would publish summaries of matters in the public interest and meeting minutes on its new website, due for release within the first quarter of 2021. This will be checked by the Authority in due course. The Authority found that the Recommendation had been considered.
- 5.3 At the previous annual review, the Authority considered a concern from a service user who had raised a concern against a Save Face registrant. They had left a 'one star' review on the 'Rate this Clinic' facility on Save Face's website. Save Face's clinic pages are the primary point of contact for those accessing Save Face's register. The service user expressed concern that their negative review was not published, which was in line with Save Face's published policy of handling negative reviews under its complaints handling policies.
- 5.4 The Authority had considered that such concerns could impact on a register's transparency, communication with the public, and stated commitment to public protection and therefore fell under the remit of the Accredited Registers programme. The Authority considered that such a facility for service users to publish feedback should be clearer about the basis for which submissions would or would not be published. The Authority issued a Recommendation for Save Face to reconsider its approach and further develop its policy about what is or is not included within published reviews.
- 5.5 Save Face stated it had considered its published approach and was content with its current practices of treating negative reviews as complaints. Such processes assisted it to identify risks and areas for improvement.
- 5.6 The Authority noted that information stating that negative reviews are not published is posted under the 'leave a review' section of clinic information, but not in search results or registrant details, which could affect the public's ability to make informed decisions. Save Face advised that its new website would make this prominent within search results and registrant details.

- 5.7 The Authority found that the Recommendation had been considered, however noted that issues such as the above, and other Recommendations such as the use of the Accredited Registers quality mark on clinic results (as discussed in paragraphs 10.5-10.6) suggested Save Face should review its approach to transparency when developing its new website and register.
- 5.8 The Authority issued a Recommendation for Save Face to consider its approach to transparency when developing its new website and register. This should include its approach to publication of ratings, and its promotion of the Accredited Registers quality mark(Recommendation One)
- 5.9 The Authority had received a related concern that if Save Face promoted clinics based on positive reviews there would be an incentive for clinic operators to misuse this. Save Face advised the Authority of actions taken to verify reviews submitted to its website.
- 5.10 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 There were no significant changes reported or noted in the past year.
- 6.2 The Authority found that the Standard continues to be met.

Standard 7: governance

- 7.1 Save Face reported that furlough, and adaptations to working from home due to the Covid-19 pandemic had presented challenges, but not disrupted its service or accessibility.
- 7.2 Save Face highlighted that due to the increased accessibility and popularity of video conferencing services due to the pandemic, it had been able to better engage with the press, statutory regulators and other stakeholder bodies.
- 7.3 Save Face highlighted contributions to public awareness campaigns and its work in the media to highlight issues relating to public safety. This included [television](#), [radio](#), [print](#) and [online](#) publications. Save Face highlighted its [Had Our Fill Campaign](#) with the Sun newspaper, which aimed to ‘increase public awareness about the risk of cosmetic treatments and to call for legislation to protect those who are vulnerable and risk to exploitation’. Save Face reported this had resulted in the development of a Private Members Bill to call for new legislation around these matters.
- 7.4 Save Face’s Advisory Board minutes reflected that the Covid-19 pandemic had increased its engagement with registrants. Save Face had provided telephone support as well as published advice and guidance. Save Face noted initial confusion from registrants about provision of services following the initial Covid-19 lockdown, but following deployment of Save Face’s operational protocol, (see Standard 10) it had received positive feedback.
- 7.5 Save Face’s Advisory Board members are listed on its website’s [Continuous Improvement and Governance](#) page. Save Face advised that it is in the

process of recruiting a new Advisory Board Chair and aims to appoint in March 2021.

- 7.6 Save Face's Advisory Board includes lay membership, however at the previous annual review, Save Face reported that its lay member had been unable to recently participate. The Authority highlighted the value of lay membership on Boards to challenge professional views and provide perspectives that may not be held by clinical members. At the last annual review Save Face had been issued a Recommendation to consider how it can include lay perspectives within its governance.
- 7.7 Save Face confirmed its Advisory Board presently includes lay membership and that they are informed and consulted if they cannot attend meetings.
- 7.8 Save Face advised of further plans to engage with groups of lay people who are consumers of non-surgical cosmetic procedures. Remote meetings would be held, with Save Face's lay Board members in attendance. Save Face had noted as a challenge that lay Board members might face difficulties contributing to clinical matters discussed at board meetings, and that such stakeholder meetings would assist them to contribute and drive agenda items of their choosing. The Authority found that the Recommendation had been considered.
- 7.9 The Authority found that the Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 Save Face highlighted a specific update to its [Standards for Accreditation](#) on prescribing for, or training of, non-healthcare practitioners:
'A1.6 In alignment with Save Face principles, clinicians will not prescribe for, provide training to, or delegate injectable treatments to non-healthcare clinicians.'
- 8.2 The Authority noted this could reduce risk of harm from treatments by practitioners not under suitable regulation or registration.
- 8.3 At the previous annual review, the Authority considered Save Face's approach to whistleblowing and the professional Duty of Candour. The Authority checked Save Face holds an internal policy or guidance should a staff member seek to 'whistleblow'. The Authority checked informal practices were in place however noted that it is good practice for organisations to make clear what employees should do if they discover wrongdoing within their business. Save Face was issued a Recommendation to consider developing a formal whistleblowing policy.
- 8.4 Save Face provided its whistleblowing policy which sets out what employees, contractors, and other roles should do 'if they have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) them or other colleagues.' The policy provided contacts for raising whistleblowing concerns, and alternate contacts should the former be related to the concern. The Authority found that the Recommendation had been considered.
- 8.5 The Authority noted that due to the Covid-19 pandemic Save Face had conducted inspections of practitioners' clinics by video call, instead of live site-

visits, to respect social distancing rules. Save Face had reported these had 'proved very successful without compromise' but would return to on-site inspections when safe to do so.

- 8.6 The Authority checked Save Face's updated clinical audit tools which included checks to assure safe practice by registrants working in their home environments. Save Face advised that it had begun collecting data to identify specific risks relating to services provided in home-based clinics, which would be audited and reviewed when sufficient data was held.
- 8.7 The Authority noted that Covid-19 specific safety measures had been added to Save Face's clinic audit tools.
- 8.8 The Authority noted that [Save Face's Covid-19 Operational Protocol](#) set out additional standards for registrants 'in addition to routine infection control, health and safety measures and professional standards.' Additional requirements included the need to 'Screen patients over the telephone, in addition to the usual medical, social and psychological history, specific risks for Covid-19 need to be identified'. The policy set out that 'any staff with symptoms must self-isolate and close contacts advised and act as per government guidelines.'
- 8.9 The Authority found that the Standard continues to be met.

Standard 9: education and training

- 9.1 At Save Face's initial accreditation assessment, the Authority considered whether Save Face set appropriate educational standards to enable its registrants to practise competently and had set Conditions and Learning Points to address this. Save Face had since developed mechanisms to provide assurance of registrants' competence. This included its [essential curriculum](#) of registrants' required competencies and surveys of training courses to identify those that would not meet its standards.
- 9.2 Save Face had developed its '[Ofqual Regulated Level 7 Certificate in Injectables for Aesthetic Medicine](#)' to assure the competence of its registrants (all statutory regulated professionals), by providing a recognised qualification in Cosmetic Injectables (botulinum toxin and dermal fillers). The Certificates assured both knowledge and skills at for these invasive procedures at Regulated Qualifications Framework (RQF) Level 7.
- 9.3 Save Face noted take-up of the Certificate had been lower than expected, although professional development and maintenance of competence by registrants remained evident. Save Face advised that it had stopped offering the Certificate and had instead been 'working on an accessible and meaningful means to assess and qualify competency knowledge and influence the training landscape'.
- 9.4 Save Face advised it had partnered with The Royal Society for Public Health (RSPH) to launch the Qualification Council for Cosmetic Procedures (QCCP), which offers a competency-based examination and qualification, [awarded and regulated by the RSPH](#).
- 9.5 The Authority noted that two exam-based qualifications are available:

- Medical Aesthetics Certificate: Understanding the Safe Use of Botulinum Toxin in Cosmetic Procedures
 - Medical Aesthetics Certificate: Understanding the Safe Use of Dermal Fillers in Cosmetic Procedures
- 9.6 The Authority noted that [each qualification](#) follows an exam which ‘tests knowledge and understanding of the theoretical basis for competent treatment benchmarked against the following competency standard. The Exams are regulated and awarded by the Royal Society for Public Health.’ This model aimed to remove the ‘time and monetary barriers that have discouraged practitioners from undertaking the university and level 7 awards’.
- 9.7 The Authority will check registrant engagement with the Certificates in due course.
- 9.8 The Authority found that the Standard continues to be met.

Standard 10: management of the register

- 10.1 The Authority considered Save Face’s approach to the Covid-19 pandemic. Save Face published articles, guidance and blog posts on its website. This included up to date Government guidance advising whether practitioners’ clinics were required to remain closed or could operate where assured they met all required measures.
- 10.2 Save Face encouraged registrants to implement its [Covid-19 Operational Protocol](#), which set out how clinics should operate to ensure public safety once allowed to resume services. Save Face provided Safety Charters and Consent forms outlining how registrants would aim to ensure safe practice.
- 10.3 Save Face highlighted its positive relationships with statutory healthcare regulators and other relevant organisations, and that it had signed MOUs with many of these.
- 10.4 Save Face reported that its was developing its new website which expected to launch in the first quarter of 2021. At launch, the Authority will consider how Save Face addressed matters raised during assessments of the existing website. This includes clarity and ease of use of the practitioner register, publication of Advisory Board minutes or excerpts in the public interest, reflecting and linking statutory regulators’ sanctions against Save Face registrants, and highlighting MOUs with the regulators. This would also include implementation of the Recommendations issued under Standards 5 and 11.
- 10.5 Save Face had previously fulfilled an Instruction set by the Authority to add explanatory text to its clinic search to ensure it was clear that accreditation related to individual practitioners on its register. At recent annual reviews, the Authority noted that the Accredited Registers quality mark appeared on Save Face’s clinic search facility but not its practitioner checker facility. The Authority issued a Recommendation for Save Face to review how the Accredited Registers quality mark, and references to its Accreditation, is presented on its website, register and search functions.
- 10.6 Save Face had advised that its new website would provide a multifaceted search allowing users to search by clinic and practitioners together to avoid

potential confusion. The Authority had highlighted that Save Face should consider how it could ensure transparency of its register functions when issuing the Recommendation in Standard 5 and will check this in due course. The Authority found that the Recommendation had been considered.

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

Standard 11: complaints and concerns handling

11.1 Save Face reported 18 concerns were raised against registrants over the previous year, all of which were resolved informally. Save Face reported that most complaints were from dissatisfied patients seeking refunds. Save Face advised it had changed its communications to manage expectations and make clear the goals of its complaints processes. Save Face's Advisory Board had reviewed summaries of the concerns.

11.2 The Authority noted that Save Face's Advisory Board had identified registrants' need for 'educational material to promote and support compliance with good complaints management'. Save Face advised it had signposted registrants to information on complaints management and opportunities for discussion through its social media and email communications.

11.3 Save Face had advised it had reviewed its complaints policy and following delays due to the Covid-19 pandemic, aimed to present recommendations to its Advisory Board in March 2021. Save Face aimed that changes should simplify its process, allow decisions to be made expediently, and demonstrate how decisions were made. The Authority would check this in due course.

11.4 At the previous annual review, Save Face reported it had been made aware that a registrant had breached its standards and escalated this to the Nursing and Midwifery Council (NMC). Save Face accepted the registrant's resignation and removed them from its register. The NMC's subsequent investigation resulted in a six-month suspension of NMC registration.

11.5 The Authority noted that Save Face's actions appeared proportionate and in line with its commitment to protect the public but were not reflected within its published complaints processes. In line with previous decisions where registers decisions reflected involvement of relevant authorities (such as the police or statutory regulators), the Authority had issued a Recommendation for Save Face to consider ensuring its internal and external complaints processes are clear about how it will manage those situations.

11.6 Save Face advised that this would be considered when revising its complaints policies and published on its new website in due course. The Authority noted the need for written policies to reflect decisions were consistent and explained clearly and reissued the Recommendation. (Recommendation Two)

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

Share your experience

12.1 The Accreditation team received three responses to its invitation to Share Your Experience within the assessment period and throughout the accreditation year.

- 12.2 Two were from registrants that complimented Save Face on its professionalism and response to Covid-19, as demonstrated by its operational protocols.
- 12.3 The third respondent raised concerns about Save Face's ability to meet the Standards. Concerns were raised about potential for abuse of Save Face's online clinic review system and its refusal to publish negative reviews, discussed under Standard 5.
- 12.4 The respondent questioned if Save Face undertook ongoing scrutiny of registrants and suggested potential conflicts of interest between its business and regulatory functions. The Authority noted that such matters had been checked within previous assessments and had not received evidence that its standards or practices had changed.
- 12.5 A concern was raised that Save Face should not equate its accreditation with being 'government approved' in its advertising. The Authority noted that several Accredited Registers advertised themselves as such and that it had not directed against this.

Impact assessment

- 13.1 The Authority took account of the impacts on different groups when making its decision to reaccredit.

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 Save Face had investigated how the mental health of service users was considered by registrants. Save Face advised it would incorporate mental health into its patient questionnaires and consider this within its auditing. Save Face included specific consideration of mental health in its Covid-19 guidance. Save Face reported it aimed to develop relevant training with the Mind, the mental health charity.