

Accredited Registers

Notification of Change

Joint Council for Cosmetic Practitioners (JCCP)

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About the Joint Council for Cosmetic Practitioners (JCCP)

The JCCP operates a register of 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 not accepted by JCCP into Part A, or those who are eligible but are not currently regulated or licensed (and who left their regulator in good standing).

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 twelve months.

Once accreditation has been granted, significant changes to an Accredited Register need to be assessed by the Authority to ensure ongoing compliance with the Accreditation Standards. These are submitted to the Authority as a notification of change.

Changes can be approved by a Moderator in cases where compliance with the Standards is not affected by the change. A Moderator can issue Recommendations and note Achievements.

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 approve the change, approve the change with Conditions, or reject the change. Panels may also issue Recommendations and note Achievements.

- **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
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

The change was approved by a Moderator following a review of evidence gathered by the Accreditation team and supplied by the JCCP.

The following Recommendation was issued to be implemented by submission of annual renewal documentation.

1. The JCCP should ensure the information it provides on its website and public materials is sufficiently 'plain-English', for example in its descriptions of register categories (Paragraph 10.15).

The following report provides detail supporting the outcome.

Notification of Change

When JCCP applied for accreditation, it advised that registrants of both Part A and Part B (as described above) were to be listed as either *full registrants* or as *provisional registrants* for the modalities they practise. Both *full* and *provisional* registrants must have been in practice for two years and adhere to JCCP's Codes of Conduct and other requirements.

Full registrants must have demonstrated meeting JCCP's standards of education and training. *Provisional registrants*, however, have not met JCCP's standards of education and training, but have demonstrated that they have completed (unaccredited) training in the relevant register modalities. *Provisional registrants* would have two years from point of registration to meet JCCP's education and training standards and be upgraded to *full registration* or be removed from the register.

JCCP proposed to allow 'Part A' regulated healthcare professionals who do not meet JCCP's standards of education and training (as set out in the JCCP-CSA Competency Framework and Supervisory Matrix) but have three years' working experience in their registered modalities, to be immediately listed as full registrants.

Following discussion with the Accreditation team, JCCP updated its proposal, and proposed to create a distinction between those who have and have not met the standards of education and training. The new proposal was that full registrants will be divided into two subcategories 'Full – Category One' and 'Full – Category Two'.

Full – Category Two practitioners would still need to meet the register's current initial joining requirements for provisional registration (with the addition of having three years' experience in the relevant modalities as opposed to two) and would still be subject to the two-year requirement to evidence training qualifications that meet JCCP's standards.

The proposed registration possibilities for the register were:

PART A (designated, regulated healthcare professionals)	
Part A registrants that do not meet the standards for education, training & practice and have two years' experience	Provisional Registration
Part A registrants that have been assessed as meeting the standards for education, training & practice	Full Registration – Category One
Part A registrants that have not been assessed as meeting the standards for education, training & practice and have three years' practice experience	Full Registration – Category Two
PART B	
Part B registrants that do not meet the standards for education, training & practice and have two years' experience	Provisional Registration
Part B registrants that have been assessed as meeting the standards for education, training & practice	Full Registration

JCCP advised this was an aesthetic change to the presentation of the register: JCCP intended that this would attract currently practising, experienced practitioners who may be discouraged by the 'provisional' label. JCCP emphasised that all 'Full – Category Two' practitioners will have been vetted by their statutory regulator, are subject to that regulators' continuing fitness to practise requirements, and are required to work within their profession's scope of competence.

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 In our initial report when accrediting JCCP, we outlined the structure of the register, which includes a 'provisional register of practitioners who, at point of application, may be in practice but have not demonstrated meeting JCCP's standards of education and training. They will adhere to JCCP's Codes of Conduct and other requirements and will have two years to obtain the required qualifications and be transferred to the clinical or non-clinical registers. The register will be annotated to state the *provisional* status of these registrants and a definition of this will be provided on the website. Provisional registrants will be subject to the JCCP's Fitness to Practise (FtP) Rules.'
- 1.2 When submitting its notification of change, JCCP advised that it aims to make a 'change in 'nomenclature' and 'presentation' rather than to a structural change in its register' that will encourage 'highly experienced practitioners to join and to 'then be 'Ambassadors' for its standards and best practices of accreditation and CPD'.
- 1.3 JCCP's register website highlighted (at time of initial assessment) the current practitioner requirements for entry:

'You are required to have undertaken JCCP authorized education or training to the level set out in the matrix to register fully with JCCP for each specific modality. You can register provisionally for a specific modality as long as you can complete the application and have been undertaking procedures in that modality for a minimum of two years.'
- 1.4 The team noted that JCCP's 'Proposals for Changes to the Practitioner Register' document, considered by its Board, discussed offering 'full registration' to Part B (non-regulated) registrants with similar experience. The subsequent Notification of Change form however confirmed that this change will not be extended to Part B registrants as those practitioners have not had their competence assured by being on a statutory regulated register or by presenting JCCP-approved qualifications.
- 1.5 The Moderator found that compliance with this Standard was not affected by the change.

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

- 2.1 When assessing this change, the team considered whether JCCP's ability to protect the public and promote public confidence in the occupations it registers could be affected. JCCP's proposal for the change provided to its Board stated: 'at the heart of all we do is a unstoppable quest to promote public confidence and to assure person/patient safety'. JCCP advised that its standards for entry to the register, other policies and standards have not changed. JCCP's application highlighted that it aimed to 'enable practitioners

to gain fair and proportionate entry to the Council's Practitioner Register without compromising patient safety or public protection'.

- 2.2 JCCP's Notification of Change form stated that it consulted with its own Trustees, members of its Stakeholder Council, with patient representatives and professional bodies before deciding to make this change. The team checked evidence of this provided by JCCP, including indications of support from JCCP's patient representatives.
- 2.3 The team considered that this change could be perceived as a conflict of interest, where JCCP's standards were lowered to ensure the register's sustainability. A Share Your Experience response similarly suggested that the change was proposed solely to promote the register rather than to protect the public. Allowing practitioners to appear as 'full registrants' without meeting JCCP's own standards could affect JCCP's ability to promote public confidence in the register.
- 2.4 The team asked the JCCP for its perspective on the above. JCCP responded:
'The JCCP is a not for profit charity and acts at all times within the spirit of the Nolan Principles. It has no commercial interest. The JCCP is an extremely new organisation and has mobilised at pace to provide the public with a register that can begin to provide them with information to inform their selection of a safe practitioner. The proposed change now being sought was also raised at a Stakeholder Council forum held in May 2018 where many members of the wider stakeholder community were present and was again discussed at length at a Stakeholder Council meeting held last week. We would reiterate the fact that the JCCP has one primary aim – to provide the public with access to a Register of Practitioners who are considered to meet its published standards in order to provide them with confidence when they select a practitioner with regard to public protection and patient safety.

The JCCP steadfastly holds true to this aim and would advise that it would never compromise patient safety in order to sustain its membership, function or future.'
- 2.5 The Moderator noted it was in the public interest that practitioners join an Accredited Register and become subject to its Standards. The Moderator found that compliance with this Standard was not affected by the change.

Standard 3: risk management

- 3.1 JCCP highlighted that practitioners allowed to join the register as full registrants in Category Two will be registered with a statutory healthcare regulator. JCCP's register states that its practitioners voluntarily abide by extra, practice-specific codes of conduct and competence, including requirements for supervision, minimum procedures to gain experience, and audit of premises. All registrants must have demonstrated meeting JCCP's education and training standards within two years of registration.
- 3.2 JCCP also highlighted that practitioners allowed to join as full registrants in Category Two will be required to have a 'minimum of three years' experience in the designated specialism for which the registrant seeks to register' which

provides additional mitigation against risks, alongside JCCP's existing requirements. Presently, provisional registrants are required to have been in practice for two years at point of application.

- 3.3 JCCP provided a risk matrix concerning risks related to this change of policy and mitigating actions. The matrix considered risks such as:
- Practitioners falsely declaring they have three years' experience; mitigated by scrutiny of log books at annual renewal of registration
 - Practitioners' premises not meeting JCCP standards; mitigated by sample paper-audit, validated by registrants' supervisors or other reliable sources
 - Practitioners not meeting supervision and oversight requirements; mitigated by annual audits of supervision details
 - Practitioners not meeting standards of safe prescribing practice; mitigated for non-prescribers by the oversight of their prescribing practitioners, and for prescribers by their requirements to follow the standards set by the statutory regulators
 - Practitioners acting outside of JCCP/CPSA codes of conduct; mitigated by risk of sanction and by providing training and publicity around this.
- 3.4 The team sought further information on the risks and mitigations, including whether JCCP had considered if there were additional risks regarding healthcare professionals on Part A of the register who in their undergraduate training may not have detailed training on facial anatomy (for example podiatrists, diagnostic radiographers), being admitted as Full – Category Two registrants. JCCP responded that it 'requires all Part A applicants to confirm that they have undertaken CPD and other related training courses that are appropriately associated to their selected modality/level of practice in order for them to practise safely.'
- 3.5 JCCP restated that for Part A it only accepts the statutory regulators' 'designated professions' considered suitable to practise non-surgical cosmetic procedures within their agreed scope of professional practice. JCCP checks their current registered status at point of application. JCCP acknowledged that not all Part A professions could 'provide evidence of having completed training in advanced facial anatomy' but that it requires them to 'confirm/declare that they are safe to practise as knowledgeable/competent practitioners for each of the procedures that they perform in accordance with the detailed set knowledge and competence standards that are set out in the CPSA standards for each modality/level and by the JCCP in its Competence Framework for Cosmetic Practice (2018)'.
- 3.6 JCCP restated that these registrants must either gain approved qualifications or be assessed as meeting JCCP's standards within two years. The JCCP advised that JCCP-approved post initial qualification Level 7 courses are now available and that it expects to approve further courses over the next 12 months.
- 3.7 The Moderator found that compliance with this Standard was not affected by the change.

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 The Moderator found that compliance with this Standard was not affected by the change.

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

- 5.1 JCCP's Trustee Board have been consulted on these changes, which have been discussed in its meetings. The team noted that it would assist JCCP's transparency if minutes from such meetings were published on its website. JCCP advised that it will be publishing its Trustee Board minutes with effect from January 2019 with the redaction of matters considered to be confidential. The team would check for this in due course.
- 5.2 The Moderator found that compliance with this Standard was not affected by the change.

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 Moderator found that compliance with this Standard was not affected by the change.

Standard 7: governance

- 7.1 The team noted that this change regarded the presentation of information about registrants. Due to the potential for confusion (full registrants with JCCP-accepted qualifications and full registrants without), the team considered that the information provided by JCCP and registrants should be as clear as possible. The team asked for information about how the changes to the register would be presented (see Standard 10).
- 7.2 The team checked the JCCP website and noted that some webpages providing potentially useful or important information were still under development or otherwise not accessible by the public. The team considered whether other information provided on JCCP's website would assist the public to make informed decisions about its registrants, should the change be accepted, and addressed points raised with JCCP. JCCP responded with an action plan for updating its website on the areas noted throughout October and November 2018 and onwards, to be checked by the team in due course.
- 7.3 The Moderator noted JCCP's consultative approach with relevant stakeholders when developing this change.
- 7.4 The Moderator found that compliance with this Standard was not affected by the change.

Standard 8: setting standards for registrants

- 8.1 JCCP proposed to allow practitioners with three years' experience, but who have not been assessed as meeting its education and training standards, to appear as Full – Category Two registrants. Three years' experience, along with a minimum of 150 procedures, is the original benchmark set by Health Education England in 2015.
- 'The three-year standard was revisited on many occasions by the JCCP and by the CPSA during 2016-2018 and was endorsed as being the correct period of 'suitable post-initial qualification experience' for those practitioners who do not hold an additional fully approved post qualifying education/training qualification at the time of registration with the JCCP. For those Registrants who hold an approved JCCP qualification then the three-year rule will be considered to include the period during which the registrant was enrolled on their post qualifying JCCP approved training course. The three-year standard was further approved by the JCCP's Register Committee in 2017.'
- 8.2 JCCP's *Code of Practice* states that 'Non-medical aesthetic practitioners and provisionally registered clinical professionals (or Trainees) must ensure they are supervised when performing treatments at level 6+.' This requirement, and the JCCP supervision matrix, will not be affected by the change.
- 8.3 The team asked for further information about processes for removal of full registrants who do not meet their two-year obligation, as to whether this would be an administrative or disciplinary process, with publication of the removal. JCCP confirmed that full registrants who do not meet education and training requirements within two years will be administratively removed from the register.
- 8.4 The Moderator found that compliance with this Standard was not affected by the change. The Moderator noted that some matters related to this Standard were addressed under Standard 10.

Standard 9: education and training

- 9.1 At the time of application, it was not possible to present a qualification that meets the JCCP Education and Training Providers Register standards, therefore all applicants are admitted as provisional registrants. Provisional registrants have two years to demonstrate that they have undertaken a course that meets those standards or have had their qualifications or experience assessed by JCCP through its developing Accreditation of Prior Learning (APL) or Accreditation of Previous Experiential Learning (APEL). If a practitioner is approved through APL or APEL, they will be categorised as Full registrants.
- 9.2 The team considered whether it may be inappropriate for practitioners who have not been assessed as meeting the register's standards for education and training to be admitted as full registrants. The team noted that other registers for non-surgical cosmetic interventions had also admitted regulated health professionals as full registrants without systems for external assurance of qualifications in place at the point of initial accreditation. The Panel had set

- a Condition requiring such a register to set education standards and assure that registrants meet them, which has been fulfilled by the register.
- 9.3 The team asked JCCP to confirm the current checks undertaken on a practitioner's modality-specific cosmetic courses prior to registration, and whether there will be any changes to these. JCCP confirmed that it requires applicants to confirm that they have undertaken relevant training courses and for their selected modality/level of practice. JCCP confirmed that evidence of such training is required to be submitted by applicants to the register.
- 9.4 JCCP's initial application advised that applicants must provide their credentials at point of application to be checked by HF Resolution, the third-party firm that manages the register. Where HF Resolution does not have the expertise to judge an application, JCCP will call on its Appointments Panel to assess this. JCCP confirmed that this remained correct and that experts from amongst its committee members would advise HF Resolution whenever expert advice was required.
- 9.5 The Moderator noted that during its assessment, the team had arranged with JCCP to visit the register's administrators to check the application process at the following annual review.
- 9.6 At the time of assessment, JCCP was developing its APL/APEL procedures, which are due to be in place by May/June 2019. As previously noted, registrants will have two years from the date of registration to meet JCCP's requirements for Full – Category One registration.
- 9.7 The team asked if a registrant who was removed after two years for not meeting the education and training standards would be able to reapply to the register, and if they would be granted further time as a provisional registrant. JCCP confirmed that such practitioners would have to meet standards for Full – Category One registration at the point of application and would be ineligible to re-join as either a Provisional registrant or Full – Category Two registrant.
- 9.8 The Moderator found that compliance with this Standard was not affected by the change. The Moderator noted that some matters related to this Standard were addressed under Standard 10.

Standard 10: management of the register

- 10.1 A Share Your Experience response stated that JCCP's website currently does not make clear what distinguishes a provisional member from a full member and why, or why not, a member of the public should choose either. The team noted that the definitions of provisional and full registration did not appear readily available on the register website and asked where these could be found. JCCP responded that it had published these definitions within the body of its Standards for Entry to the Register but has since amended these definitions.
- 10.2 The team requested further detail on the information to be displayed on the public register for each type of registrant, including qualifications, and where links would be made to expanded definitions for the benefit of service users. JCCP provided a list of features to be included on its amended registrant profiles.

- 10.3 JCCP created a series of register-logos in varying colours to help identify the registrant's category, the modalities of treatment practiced, and the level of training for that modality, which was provided to the team.
- 10.4 JCCP will be updating the information presented on its register, and the descriptions of each category of registrant, to ensure these are clear to the public. All fully registered practitioners will be annotated with 'Full – Category One' or 'Full – Category Two' against their names. JCCP will provide guidance notes to registrants about displaying information about their registration themselves.
- 10.5 The Moderator considered that it was undesirable and potentially misleading for individuals to be described as 'full registrants' when they had not been fully assessed as meeting the JCCP's registration requirements and may subsequently be removed for not meeting those requirements. The Moderator noted however that registrants in Category Two will be experienced practitioners likely to be able to satisfy the APL requirements. The Moderator therefore considered that it would be appropriate to approve JCCP's proposals as a transitional measure while it was developing its APL route of registration.
- 10.6 The Moderator required JCCP's assurance that it would launch Full – Category Two as an interim or transitional process. As soon as APL was available, a cut-off date should be announced from when no further Full – Category Two registrants would be admitted. At that stage, experienced practitioners would have access to both APL and accredited training, to be listed as 'Full Registrants'.
- 10.7 JCCP confirmed that it would launch Full– Category Two as an interim or transitional process. JCCP informed the team that it aimed to launch the new category from January 2019. JCCP aims to open assessment centres allowing practitioners to undertake APL assessment, who may then potentially achieve Full – Category One status, by May/June 2019. At that time JCCP would announce a cut off date for Full – Category Two status of 31 January 2020. Full – Category Two registrants will have two years to meet JCCP's training and education standards or be removed from the register. There will therefore be no no Full – Category Two registrants on the register by 1 February 2022 as they will have achieved Category One status or have been removed from the register.
- 10.8 JCCP confirmed that as a result of this application, no changes to its policies on provisional registration for Part A and Part B practitioners would be made.
- 10.9 The Moderator considered whether the information presented could, as described, provide enough information for the register to remain accurate, easily accessible and support all those using it to make informed decisions
- 10.10 The Moderator required JCCP's assurance that it would make its definitions of Full – Category Two explicitly clear that these practitioners have not yet been assessed as meeting the JCCP standards for education and training. Definitions should lead with this information to make this explicitly clear to the public. JCCP provided draft information to be published on its website should the change be approved, which was reviewed by the Moderator. The Moderator suggested that JCCP consider emphasising that Full – Category

Two are subject to the standard two-year limit to meet its education and training requirements.

- 10.11 The Moderator considered that members of the public may have difficulty understanding this information. The Moderator issued a Recommendation that the JCCP should ensure the information it provides on its website and public materials is sufficiently 'plain-English', for example in its descriptions of register categories.
- 10.12 The Moderator, having received and reviewed the additional information provided by JCCP, found that compliance with this Standard was not affected by the change.

Standard 11: complaints and concerns handling

- 11.1 The Moderator found that compliance with this Standard was not affected by the change.

Share your experience

- 12.1 The Accreditation team received two responses to the Share Your Experience process. Neither response provided consent to share with JCCP. The team checked concerns raised against information held and in the public domain, and where relevant, addressed those concerns within the above standards.

Impact assessment

- 13.1 Allowing practitioners to be registered as full registrants at an earlier stage could attract practitioners to the register and bring them under JCCP's scope of assurance. It is in the public interest for practitioners to be on an Accredited Register. Registration requires such practitioners to improve their skillset and this in turn could encourage education providers to develop their courses to provide access to JCCP's register. JCCP had provided estimated numbers of practitioners who might register as Full – Category Two.
- 13.2 There is a risk that providing for two subsets of 'full' registrants without clear explanation of this and delineation between these subsets may reduce clarity and hinder the public's ability to choose practitioners. This risk was addressed during the assessment process.
- 13.3 The Moderator noted and took account of the impact of their decision to approve the change.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering this notification of change. The Moderator noted that encouraging alternate routes of entry to a register could support this duty.