

# Targeted Review: Save Face

## 1. Outcome

- 1.1 The Accreditation Panel considered the evidence from a targeted review of **Save Face**'s register, which focused on Standards Two, Six and Nine of the *Standards for Accredited Registers*<sup>1</sup>. The review considered whether Save Face's public register gives members of the public sufficient assurance about who is on the register and how statutory registration can be checked; whether Save Face publishes enough governance information to support transparency and public confidence; and whether Save Face had demonstrated that it meets the Equality, Diversity and Inclusion minimum requirements relating to unconscious bias, demographic assurance, and published information.
- 1.1 In reaching its decision, the Panel took account of Save Face's distinct registration model, the history of earlier assessment findings, and recent additional information. The Panel concluded, however, that conditions were required where the evidence did not provide sufficient assurance that the relevant minimum requirements were met.
- 1.2 The Panel found that Standard Two was met with one condition and one recommendation. Standard Six was met. Standard Nine was met with two conditions and one recommendation. These findings are relevant to public protection and public confidence because they affect the information available to the public about who is on the register, how statutory registration can be checked, how treatments are described, and how Save Face addresses equality, diversity and inclusion in its regulatory processes.
- 1.3 The table below summarises the outcomes reached by the Accreditation Panel against each Standard under consideration:

Standard	Outcome
Two	Met with a condition and a recommendation  <b>Condition C-SF-TR-26/27-1:</b> Save Face must ensure that its public register provides a clear and accessible way for members of the

<sup>1</sup> Standards for Accredited Registers, 2023 edition:

<https://www.professionalstandards.org.uk/publications/standards-accredited-registers>

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public to identify registrants accurately and obtain assurance about their statutory registration status. This must be completed within six months.

**Recommendation R-SF-TR-26/27-1:** Save Face should ensure that treatments shown on practitioner profiles are clearly reflected in its central treatment information, including where treatments are described by brand names, sub-types or other descriptors. The information should help members of the public understand how individual treatments relate to Save Face’s main treatment categories and any relevant safeguards or practitioner requirements.

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Six	Met
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Nine	Met with conditions and a recommendation
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**Condition C-SF-TR-26/27-2:** Save Face must implement, and begin to use, arrangements to collect and use demographic information, or another method that provides equivalent assurance, so that it can understand the diversity of its registrant base and identify whether there are barriers, unfairness or disproportionate impacts within its regulatory processes. Evidence of this work must be provided by the next full renewal assessment.

**Condition C-SF-TR-26/27-3:** Save Face must publish clear information explaining how it complies with the Equality Act 2010 and how it works to promote equality, diversity and inclusion within its regulatory policies and processes. This must be completed within three months.

**Recommendation R-SF-TR-26/27-2:** Save Face should strengthen how it considers and reduces the risk of unconscious bias in the appointment and support of people involved in its Boards, Committees and Panels. This may include relevant training, structured guidance, or other measures that support fair and objective decision-making.

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## 2. Background

- 2.1 We assess registers against our Standards for Accredited Registers (“the Standards”). Where we need further information, or where concerns remain following annual monitoring, we may carry out a targeted review.
- 2.2 Save Face was subject to a targeted review following annual check findings relating to Standards Two, Six and Nine. Save Face registers only practitioners who are already subject to statutory regulation by a UK health professional regulator, and it maintained that some minimum requirements were not necessary in light of that registration model. Earlier assessment work had identified concerns that some of those minimum requirements might not be met. The targeted review was therefore used to gather further information, consider Save Face’s rationale that it’s model of registration was distinct and therefore the minimum requirements were not as relevant to its ability to perform its functions, and reach a decision on whether the Standards continued to be met. This report sets out the issues considered by the Panel, the evidence reviewed, and the reasons for the outcome.
- 2.3 The Panel reviewed the following evidence:
- Save Face’s targeted review response
  - Save Face’s published register entries and website information
  - relevant governance and Equality, Diversity and Inclusion (EDI) material published by Save Face
  - Save Face’s previous annual check, condition review and renewal assessment outcomes
  - Recent information provided by Save Face including updates to its public FAQ page
  - Our new combined Standards, effective 1 July 2026<sup>2</sup>.

## 3. Assessment against the Standards

### Standard Two – Management of the register

- 3.1 This part of the targeted review considered whether Save Face’s public register provides sufficient assurance to members of the public, given the way the register operates in practice.
- 3.2 This issue had been identified in earlier assessment work, including a recommendation made at Save Face’s 2024 renewal. That recommendation asked Save Face to strengthen the information published on its register so that members of the public could more easily identify practitioners and understand how their statutory registration could be checked, for example by publishing regulator personal identification numbers (PINs) or by linking to registrants’ statutory register entries. Save Face did not adopt that recommendation and maintained that the relevant minimum requirement did not

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<sup>2</sup> <https://www.professionalstandards.org.uk/publications/standards-regulators-and-accredited-registers-2026>

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apply to its model of registration.

- 3.3 The issue for the Panel was whether the information currently published provides the level of public assurance intended by Standard Two. In particular, the Panel considered whether members of the public can clearly distinguish between practitioners, including where names are similar; understand how a practitioner's statutory registration can be checked; and understand treatment information shown on practitioner profiles and how that relates to Save Face's central treatment information. These matters are relevant to public protection because the public register is an important source of information for members of the public. Where published information is not sufficiently clear, consistent or easy to verify, it may be more difficult for users to understand who is on the register, what safeguards apply, and what services are covered by Save Face's accreditation.
- 3.4 The Panel noted that Save Face has internal controls in place. These include eligibility checks linked to statutory regulation, verification at the application stage, and ongoing requirements for registrants. The Panel also noted Save Face's information-sharing arrangements with statutory regulators.
- 3.5 Prior to the Panel's meeting, Save Face provided further public-facing information through its updated FAQ page. This explains which statutory regulators are relevant to Save Face-accredited practitioners, provides links to those regulators' public registers, explains that profiles show profession and regulator, and sets out Save Face's reasons for not publishing regulator PINs. The Panel took this material into account. However, the central issue remained whether the register itself provides a clear and accessible way for a member of the public to identify the correct practitioner and obtain assurance about current statutory registration status.
- 3.6 The Panel concluded that the FAQ material provided additional context and signposting but did not address the central concern. Public assurance continued to depend too heavily on the effective operation of Save Face's internal verification and information-sharing arrangements with statutory regulators. The Panel was not assured that this provided an equivalent public-facing safeguard, because the register did not itself provide a unique identifier or another equally clear route for members of the public to cross-check the practitioner against the relevant statutory register, particularly where practitioners may have the same or similar names. The Panel also noted that, where assurance depends on information sharing with, and subsequent updates by, Save Face, any delay in notification or updating could reduce the protection provided to the public. The Panel therefore found Standard Two met with a condition.
- 3.7 **Condition C-SF-TR-26/27-1:** Save Face must ensure that its public register provides a clear and accessible way for members of the public to identify registrants accurately and obtain assurance about their statutory registration status. This must be completed within six months.
- 3.8 To demonstrate that this Condition has been met, Save Face should be able to show that a member of the public can use the information on the register to identify the correct practitioner and understand how statutory registration can be verified. This may be achieved in different ways. For example, Save Face could publish a regulator PIN where appropriate, provide a direct link to the relevant statutory register entry, or use another method that provides equivalent assurance. The Panel does not require a specific solution, but the outcome must be clear and public-facing.

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- 3.9 A further issue under Standard Two was how treatment information is presented to the public. The Panel noted that Save Face has controls in place to check training, insurance and, for some higher-risk procedures, practitioner status before treatments appear on a profile. However, the public-facing presentation is not always clear. Some treatments appear on practitioner profiles using brand names, procedure names or other descriptors that are not clearly reflected in Save Face's central treatment information. This creates a risk that members of the public will not easily understand how treatments named on individual profiles relate to Save Face's categories and safeguards.
- 3.10 The Panel also took account of Save Face's explanation that practitioner profiles may use licensed brand names because members of the public often search for treatments in that way, while central treatment pages are intended to remain independent and impartial. The FAQ page also explains that Save Face verifies treatment-specific training and insurance before a treatment appears on a practitioner's profile, and signposts users to treatment guides and safety information. This provided relevant context. The remaining issue, however, was whether the public-facing information clearly showed how treatments named on individual profiles related to Save Face's treatment categories and safeguards.
- 3.11 The Panel found that this issue did not justify a condition. However, it concluded that the public-facing information could be clearer and therefore issued the following recommendation.
- 3.12 **Recommendation R-SF-TR-26/27-2:** Save Face should ensure that treatments shown on practitioner profiles are clearly reflected in its central treatment information, including where treatments are described by brand names, sub-types or other descriptors. The information should help members of the public understand how individual treatments relate to Save Face's main treatment categories and any relevant safeguards or practitioner requirements. This recommendation is issued under Standard Two and also relates to Standard Eight: Communications and engagement.

#### Standard Six – Governance

- 3.13 This part of the targeted review considered whether Save Face's governance arrangements are sufficiently transparent to support public confidence in the oversight of the register.
- 3.14 This issue arose from earlier recommendations about the publication of governance material, including board or advisory minutes. The purpose of the targeted review was to consider whether Save Face now provided sufficient transparency, whether through publication of such material or by another means that provided equivalent assurance.
- 3.15 Earlier assessment work had encouraged Save Face to strengthen transparency by publishing governance material linked to the Accredited Register. The issue for the Panel was whether Save Face publishes enough information to help the public and other stakeholders understand how the register is governed, how decisions affecting accreditation and public protection are overseen, and how accountability is maintained. This is relevant to public protection because transparent governance helps demonstrate that decisions affecting registration and public protection are subject to proper oversight and challenge.

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- 3.16 The Panel found that Save Face already publishes a sufficient range of governance and operational information. This includes information about its leadership, standards, accreditation processes, complaints arrangements and wider public protection role. The Panel also noted Save Face's commitment to begin publishing Advisory Board minutes from April 2026, which factored into its decision.
- 3.17 The Panel therefore found Standard Six continued to be met. The Panel also noted that this area should be reviewed again at Save Face's next full renewal assessment in 2026/27.

### Standard Nine – Equality, Diversity and Inclusion

- 3.18 This part of the targeted review considered whether Save Face had provided sufficient evidence to demonstrate that it met the minimum requirements of Standard Nine considered in this review, including those relating to unconscious bias, demographic assurance, and published Equality, Diversity and Inclusion information.
- 3.19 **Standard 9a – Unconscious bias in governance and decision-making**
- 3.20 Minimum requirement 9a.2 requires the register to consider Equality, Diversity and Inclusion in the appointment of decision-makers and in the composition of Boards, Committees and Panels. It should aim for diversity where possible and consider how to reduce unconscious bias.
- 3.21 The issue for the Panel was whether Save Face had shown, in a clear and practical way, how it reduces the risk of unconscious bias in the appointment and support of those involved in governance and decision-making. Save Face pointed to measures intended to support fairness and consistency. These included objective criteria, standard processes, conflict of interest controls, quality assurance activity, and a mix of clinical, non-clinical and lay involvement in governance. These measures provide some assurance against the requirement.
- 3.22 However, minimum requirement 9a.2 is not limited to general equality commitments or objective recruitment processes. It also requires the register to consider how it reduces the risk of unconscious bias. The evidence did not clearly demonstrate a sufficiently active and reflective approach to that issue in practice. In particular, it did not clearly show how Save Face identifies whether bias may still arise in decision-making, or what specific steps it takes to reduce that risk.
- 3.23 The Panel found that this issue did not warrant a condition. However, it concluded that a recommendation was appropriate to strengthen Save Face's approach in this area.
- 3.24 **Recommendation R-SF-TR-26/27-2:** Save Face should strengthen how it considers and reduces the risk of unconscious bias in the appointment and support of people involved in its Boards, Committees and Panels. This may include relevant training, structured guidance, or other measures that support fair and objective decision-making.
- 3.25 **Standard 9b – Demographic information and assurance about fairness in practice**
- 3.26 Minimum requirements 9b.6 and 9b.7 require the register to collect demographic data about its registrants in order to understand more about the diversity of its registrant base, and to use that data to identify any areas of potential unfairness in its regulatory processes, and/or barriers to registration or education and training, and to act on these.

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- 3.27 The issue for the Panel was whether Save Face had shown a credible means of understanding the diversity of its registrant base and identifying whether its processes may disadvantage particular groups in practice. Save Face's position was that its use of objective criteria and standardised processes provides assurance. The Panel noted that these controls are relevant to the requirement. However, they are not sufficient on their own. A process may be designed to be objective and still create barriers or different impacts in practice.
- 3.28 These minimum requirements are intended to help a register understand whether its processes work fairly in practice, not just whether they are designed to be fair. Without demographic information, or another method that provides equivalent assurance, Save Face cannot clearly show that it understands the diversity of its registrant base or whether its processes may affect some groups differently. The Panel therefore concluded that Save Face had not shown equivalent assurance against minimum requirements 9b.6 and 9b.7.
- 3.29 **Condition C-SF-TR-26/27-2:** Save Face must implement, and begin to use, arrangements to collect and use demographic information, or another method that provides equivalent assurance, so that it can understand the diversity of its registrant base and identify whether there are barriers, unfairness or disproportionate impacts within its regulatory processes. Evidence of this work must be provided by the next full renewal assessment.
- 3.30 To demonstrate that this Condition has been met, Save Face should be able to show what demographic information it will use, or what alternative source of assurance it will rely on; how that information will help it understand who is applying to, joining, remaining on, or leaving the register; how it will use that information to identify patterns, barriers or disproportionate impacts within its regulatory processes; and what action it would take if concerns are identified. The Panel does not require a specific method, but Save Face must demonstrate a practical and credible means of obtaining this assurance.
- 3.31 **Standard 9c – Published information about Equality, Diversity and Inclusion**
- 3.32 Minimum requirement 9c.9 requires the register to publish information about how it complies with the Equality Act 2010 and how it works to promote Equality, Diversity and Inclusion more broadly.
- 3.33 The issue for the Panel was whether Save Face publishes clear public-facing information explaining how it complies with the Equality Act 2010 and how it promotes Equality, Diversity and Inclusion more broadly. Save Face stated that it is committed to compliance with the Equality Act 2010 and that equality-related expectations are reflected across its wider policies, standards and procedures.
- 3.34 The Panel found that this was not sufficient to meet the minimum requirement. The issue is not simply whether equality-related wording can be found across different documents. It is whether the register publishes clear information explaining its overall approach. The Panel could not identify a clear public statement explaining how Save Face understands its Equality Act responsibilities, how Equality, Diversity and Inclusion are reflected in its regulatory work, and what this means in practice for applicants, registrants and the public.
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- 3.35 This is relevant to public protection because publication serves a different purpose from internal policy. It supports transparency, accountability and public confidence. It also helps people understand what standards apply and how concerns about unfairness or discrimination can be raised. The Panel therefore concluded that minimum requirement 9c.9 was not met and that a condition was required.
- 3.36 **Condition C-SF-TR-26/27-3:** Save Face must publish clear information explaining how it complies with the Equality Act 2010 and how it works to promote equality, diversity and inclusion within its regulatory policies and processes. This must be completed within three months.
- 3.37 To demonstrate that this Condition has been met, Save Face should be able to show the public, applicants and registrants what its commitment to Equality, Diversity and Inclusion means in practice; how this is reflected in its key regulatory processes, such as application, assessment, decision-making and complaints handling where relevant; and how concerns about unfairness or discrimination can be raised. The Panel does not require a specific format, but the information published must clearly explain Save Face's approach and be accessible to the public, applicants and registrants.<sup>3</sup>
- 3.38 For these reasons, the Panel found that Save Face had not provided sufficient evidence to demonstrate that all the minimum requirements considered in this targeted review were met. The Panel recognised Save Face's distinct model, including that it registers practitioners who are already subject to statutory regulation, and considered whether that model provided equivalent assurance. However, the Panel concluded that it did not justify a different approach to the substance of the Standard Nine minimum requirements. The Panel also noted that this was consistent with the approach taken to other Accredited Registers with similar features, including registers whose registrants may also be subject to statutory regulation. In particular, the evidence did not provide sufficient assurance on unconscious bias in decision-making, demographic assurance about fairness in practice, or publication of clear public-facing Equality, Diversity and Inclusion information. The Panel therefore found Standard Nine met with two conditions and one recommendation. The Panel also noted Save Face's indication that it would consider how best to address these matters.

## 4. Next steps

- 4.1 The Register must meet the Conditions by the specified deadlines.
- 4.2 The Recommendations will be followed up at Save Face's next annual assessment.

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<sup>3</sup> Prior to publication of this report, we acknowledged that Save Face had **published its Equality and Diversity Policy**. This will be checked against the Condition in due course.