

Condition Review: Save Face

1. Outcome

- 1.1 At Save Face’s accreditation renewal, the Professional Standards Authority (‘we’) issued **six Conditions** on its accreditation, all of which were to be completed by 27 December 2024 (see pages 4 and 5 of the published outcome¹).
- 1.2 This report sets out our assessment of the actions taken by the register to satisfy the Condition.
- 1.3 We found that the Save Face had met Conditions one to six. The table below summarises the outcomes for all six recommendations:

Condition number	Outcome
One	Met with a recommendation Recommendation 1: Save Face should fulfil its commitment to publish the revised text explaining the status of reviews.
Two	Met with two recommendations Recommendation 2: Save Face should consider developing curricula for treatments beyond botulinum toxins and dermal fillers, and more visibly promoting the competencies held by registrants. Recommendation 3: Save Face should consider whether the competences held by registrants should be promoted, for example, on a specific web-page or on the information provided on treatment pages ² .
Three	Met with two recommendations Recommendation 4: Save Face should provide further information about the operation of its hearings, confirming whether or not complainants may have a role in these, and if so, the support it will

¹ Save Face Accredited Registers Directory page: www.professionalstandards.org.uk/organisations-we-oversee/find-a-register/save-face

² www.saveface.co.uk/en/page/treatment-anti-wrinkle-injections

provide.

Recommendation 5: Save Face should review the format of its complaints guidance, to reduce risk of confusion as to how concerns (at any grade of risk) are managed i.e. whether hearings are held for Complaints Panels or Appeals Panels.

Four	Met with a recommendation Recommendation 6: Save Face should prepare guidance for decision makers for the rare instances in which sanctions need to be applied.
Five	Met with a recommendation Recommendation 7: Save Face should consider whether the Expert Advisory Panel would be a suitable body to consider final escalations or to quality assure of organisational complaints.
Six	Met with a recommendation Recommendation 8: Save Face should explore how to add value to its management of risk by, for example, drawing on models such as those published by regulators.

2. Background

2.1 We assess registers against our Standards for Accredited Registers ('the Standards')³. Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.

At Save Face's last full renewal, completed in June 2024, we issued six Conditions (a full list is published in the report from that assessment), Conditions 1-6 all had to be implemented by 27 December 2024

1. Save Face is to ensure that its communications are not misleading by presenting a balanced view of consumer feedback, whether by allowing negative reviews on its register entries, or by communicating how these have been addressed by other means.
2. Save Face should publish its Essential Curriculum to demonstrate how it assures the aesthetic competencies of its registrants.
3. Save Face is to develop its processes to assure that parties to complaints are appropriately supported throughout the complaints process.
4. Save Face is to develop mechanisms such as Indicative Sanctions guidance to

³ Standards for Accredited Registers, 2023: www.professionalstandards.org.uk/publications/standards-accredited-registers

assure that outcomes are consistent.

5. Save Face must develop and publish its process for anyone to raise a concern or complaint about the Accredited Register.
6. Save Face must develop a documented approach to risk management, for example development of an organisational risk register that is periodically updated and consider by its Directors/Board.

2.2 This report discusses the actions Save Face took to address the Conditions, as well as our decision about whether the Condition is met.

2.3 We reviewed the following evidence:

- Save Face's reported actions about what it had done to meet Conditions 1-6.
- Save Face's key policy documents and procedures, including its internal complaints policy and procedure (March 2024), organisational risk register, and published competency standards for high-risk procedures such as botulinum toxin and dermal filler treatments.
- Save Face's website content and public-facing information, including its "Raise a Concern" webpage, search facility showing clinic listings and review sections, and publications webpage containing training curricula.
- Save Face's operational processes and communications, including template emails used for corresponding with patients who complain and with registrants regarding complaints.
- External regulatory guidance and comparative examples from other regulatory bodies, including ASA guidance on testimonials and endorsements, General Medical Council (GMC) / Medical Practitioners Tribunal Service (MPTS) sanctions guidance, and the GMC's corporate risk register as a reference example.

3. Concerns leading to the Conditions

3.1 Save Face allows people to leave reviews of the services provided by registrants. We had, in previous assessments, considered concerns that Save Face did not publish negative reviews which may not present an accurate reflection of their registrant, even if its standards for registration have not been explicitly breached. Save Face advised that negative reviews were considered through its informal or formal complaints processes, as appropriate. Within the full renewal assessment, the Panel considered that while the CAP Code⁴ does not explicitly mandate the publication of negative testimonials, the ASA's overall emphasis is on not misleading consumers. By only publishing positive testimonials, Save Face might create an unbalanced view of consumer satisfaction, potentially misleading consumers. The ASA has upheld complaints where selective publication of testimonials has been deemed misleading. **Condition 1** was issued as result.

3.2 Save Face provides clear information on its website and within its Standards for Accreditation. The public can easily access the type and level of qualifications required for registration, including mandatory treatment-specific training, ongoing CPD, and basic life support certification. Save Face had however recognised there were variations in training quality, and so developed its "Essential Curriculum" as a self-

⁴ www.asa.org.uk/advice-online/testimonials-and-endorsements.html

assessment tool for registrants. They also promote qualifications independently assured by the Royal Society for Public Health (RSPH) to further strengthen competency. At the time of the full renewal assessment, the curriculum was not readily accessible. The Accreditation Panel deemed it essential for Save Face to clearly outline the qualifications and experience required of registrants to demonstrate their competence, distinguishing them from non-registered peers. To address this, **Condition 2** was issued. While Save Face's general complaints procedures provided adequate communication and support, we identified that limited information was available about how it's hearings would be conducted in the rare circumstances when they occur, and whether complainants might have a role in these processes. We considered that more information could be provided about the operation of hearings and any support that might be needed for complainants during these specific procedures. The Accreditation Panel issued **Condition 3** to address this.

- 3.3 In our full renewal of accreditation, we were not sure if Save Face employed 'Indicative Sanctions' guidance to assist its Registrar and Clinical Director when issuing Medium-risk complaint warnings, or High-risk Complaints Panels for matters that do not reflect statutory-regulators' outcomes. The Accreditation Panel issued **Condition 4** to address this.
- 3.4 Our Standards require Accredited Registers to have processes in place for anyone to raise a concern or complaint about the Accredited Register. Save Face's published "Raise a Concern" page, did not provide information about how it will act on such matters, which could leave people unclear about what would happen to their concerns. Therefore, the Accreditation Panel issued **Condition 5**.
- 3.5 Within our full renewal assessment, we did not see evidence of Save Face's documented approach to organisational risk management. Our Standards require registers to have processes in place to identify and take appropriate actions to mitigate organisational risks, including financial, reputational and operational challenges that could impact their regulatory work, with active oversight from their governing body. The Accreditation Panel issued **Condition 6** to address this.
- 3.6 Further details can be found under Standard Two, Four, Five and Six of Save Face's full renewal of accreditation outcome report⁵.

4. Assessment of Conditions

- 4.1 Save Face provided its response to the Conditions 1-6 on 30 October 2024.

Condition 1 – Met with a recommendation

- 4.2 Save Face has expressed a willingness to make changes to its website to make the status of the review pages on its website clearer to anyone using the website. Wishing to secure approval for the proposed changes prior to making them, Save Face have shared the textual changes, which we have approved through this condition review.

⁵ Save Face Accredited Registers Directory page: www.professionalstandards.org.uk/organisations-we-oversee/find-a-register/save-face

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- 4.3 We made the following recommendation that the textual changes are made and will follow this up in the next assessment to make sure that members of the public have a clear understanding of the nature of reviews on the Save Face website.

Recommendation 1: Save Face should fulfil its commitment to publish the revised text explaining the status of reviews.

Condition 2 – Met with recommendations

- 4.1 Save Face has published the Essential Curricula for high-risk procedures - botulinum toxins and dermal fillers. These curricula align with those produced to meet the PSA's requirements following initial accreditation. We note that these competencies can be assured through self-assessment and through courses developed in conjunction with the Royal Society for Public Health.
- 4.2 As Save Face practitioners offer a wide range of treatments that may not fall within these two categories, there may be scope to develop new competences and, as result, we have issued the following recommendation:

Recommendation 2: Save Face should consider developing curricula for treatments beyond botulinum toxins and dermal fillers, and more visibly promoting the competencies held by registrants.

Recommendation 3: Save Face should consider whether the competences held by registrants should be promoted, for example, on a specific web-page or on the information provided on treatment pages⁶.

Condition 3 – Met with recommendations

- 4.1 Save Face emphasises in its complaints materials its aim “to support the patient in making their complaint.” In most cases, Save Face will first seek to resolve the concern directly between the patient and registrant, ensuring that standards were met and recommending improvements where necessary. If the complaint involves serious concerns or ongoing risks, Save Face will conduct a more thorough assessment, which includes reviewing relevant records confidentially, with the patient’s consent. Both patient and practitioner receive a full report on the findings, and Save Face monitors complaints to ensure practitioners implement required changes.
- 4.2 Where appropriate, Save Face will escalate the complaint to a regulator, in line with its Memoranda of Understanding with those bodies. It will reflect sanctions issued by the regulators on its own register.
- 4.3 Save Face will hold complaints hearings where:
- A statutory regulator has reviewed a complaint against a registrant and determined that they may remain on the statutory register but Save Face must decide if the registrant should continue to be registered. In these cases, Save Face’s internal hearing assesses if the registrant meets its standards and considers whether the

⁶ www.saveface.co.uk/en/page/treatment-anti-wrinkle-injections

suspension should be lifted, continued with conditions, or removed from the Save Face register.

- A registrant seeks restoration to the Save Face register after a previous removal. To be eligible for restoration, the registrant must have active registration with the NMC, GMC, GDC, or GPhC, and any prior suspension or removal by the regulator must have been resolved.

4.4 The limited circumstances where Save Face will hold a hearing appear unlikely to require the input of the complainant, as the complaint will have been investigated and actioned by the regulator beforehand. While the level of communication provided to both complainants and registrants appears adequate, we suggest that Save Face clarify how such hearings will be conducted and under what circumstances complainant involvement might be required. As a result, we have issued the following recommendations:

Recommendation 4: Save Face should provide further information about the operation of its hearings, confirming whether or not complainants may have a role in these, and if so, the support it will provide.

Recommendation 5: Save Face should review the format of its complaints guidance, to reduce risk of confusion as to how concerns (at any grade of risk) are managed i.e. whether hearings are held for Complaints Panels or Appeals Panels.

Condition 4 – Met with a recommendation

4.1 Save Face explained the limited circumstances in which it will consider sanctions and the guidance that it uses. While the guidance that has been shared does not constitute indicative sanctions guidance because it does not handle matters such as mitigating and aggravating factors for the application of sanctions, it does appear to provide sufficient guidance for the rare instances in which concerns will be considered by Save Face. We suggest, through a recommendation, that Save Face prepares itself for the eventuality of a complaint which requires a more sophisticated form of guidance for decision-makers, particularly as this will be a rare event.

Recommendation 6: Save Face should prepare guidance for decision makers for the rare instances in which sanctions need to be applied.

Condition 5 – Met with a recommendation

4.1 Save Face had addressed this Condition immediately following the Panel’s decision. Save Face had added information about how it will manage complaints received including routes of escalation and intended timeframes.

4.2 The organisational complaints policy states that it aims to follow the “Parliamentary and Health Service Ombudsman’s Principles of Good Administration”, focusing on accuracy, fairness, accountability, and continuous improvement.

4.3 Complaints can be made by anyone who is dissatisfied with Save Face’s service, and there is a three-stage process: (1) contacting the manager of the involved staff member, (2) escalating to the Director, Ashton Collins, and (3) contacting the Clinical Director, Emma Davies, if needed.

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- 4.4 Complaints are acknowledged within seven working days, with a full response aimed within 28 days, though complex cases may require more time.
 - 4.5 While the condition is met we noted that complaint escalation remains within the core management team and therefore have issued the following recommendation to enhance transparency and effectiveness of oversight:

Recommendation 7: Save Face should consider whether the Expert Advisory Panel would be a suitable body to consider final escalations or to quality assure Save Face's handling of organisational complaints.

Condition 6 – Met with a recommendation

- 4.1 Save Face has provided a Corporate Risk Register that demonstrates understanding, ownership, and mitigation of key risks. Given Save Face's structure—where risk oversight is led by the Directors and relevant officers, with support from an Expert Advisory Board for clinical and patient insights—this approach sufficiently meets governance needs. However, we have issued a recommendation to support management of risks:
- 4.2 **Recommendation 8:** Save Face should explore how to add value to its management of risk by, for example, drawing on models such as the General Medical Council's risk register.

5. Conclusion

- 5.1 Save Face has taken adequate action to address all six conditions. We have issued eight recommendations to support further improvement beyond the expectations of our Standards and minimum requirements.
- 5.2 We therefore found that Conditions 1-6 has been met and Standards 2, 4, 5 and 6 continue to met as a result.
- 5.3 We will consider how Save Face has responded to the eight recommendations during their 2025/26 assessment.