

Maria Caulfield MP
Minister for Patient Safety and Primary Care
Department of Health and Social Care
39 Victoria Street
London
SW1H 0EU

12 October 2021

Dear Ms Caulfield

Re: National licensing scheme for all aesthetic non-surgical cosmetic procedures

We wanted to take the opportunity to warmly welcome you to your new role as Minister for Patient Safety and Primary Care. We are a broad coalition of public health organisations and key beauty industry representatives campaigning for better regulation of aesthetic non-surgical cosmetic procedures.

We were very pleased to see Government support for the Botulinum Toxin and Cosmetic Filler (Children) Private Members' Bill in the last parliamentary session, which is an issue that has brought together Members of Parliament from all political parties. This legislation is of vital importance in protecting under-18s from harm, but there is much more that still needs to be done, to protect all members of the public from possible harm associated with aesthetic non-surgical cosmetic procedures. When performed badly, these procedures can cause infection, allergic reactions, disfigurement, psychological and emotional trauma and the need for hospitalisation and corrective treatment.

As such, we have been working with a cross-party group of MPs to table an amendment to the Health and Care Bill giving the Secretary of State the power to introduce a licensing regime in England for aesthetic non-surgical cosmetic procedures and make it an offence for someone to practise without a licence. This is strongly supported by a number of key public health bodies, voluntary registers of practitioners for aesthetic non-surgical cosmetic procedures as well as professional bodies representing the regulators.

We have also been working closely with the APPG on Beauty, Aesthetics and Wellbeing, who supported the call for a national licensing scheme in their final report, published earlier this Summer, following their inquiry into aesthetic non-surgical cosmetic procedures. Finally, we have the support of the beauty industry organisations and standard setting organisations who see a national licensing scheme as a way to protect and implement standards whilst promoting good practice. Having successfully tabled this amendment for the Bill's Committee Stage, we will continue to refine and seek further support for it, when it reaches Report Stage and ultimately renew our campaign in the House of Lords.

The creation of a national licensing scheme for practitioners of aesthetic non-surgical cosmetic procedures would ensure that all those who practise are competent and safe for members of the public. It would also simplify and strengthen the powers for local authorities to regulate this sector effectively. CIEH's joint survey of regulators, [The ugly side of beauty](#), which we published together with the Institute of Licensing, found overwhelming support for the introduction of an England-wide licensing scheme, with 90% of respondents agreeing that this could improve the regulatory system and protect the public from harm. Likewise, the Joint Council for Cosmetic Practitioners (JCCP) has identified considerable support for the design and implementation of such a national licencing

scheme and has outlined the Council's proposal as part of its recently published [Ten Point Plan for Safer Regulation in the Aesthetic Sector](#).

Many aesthetic non-surgical cosmetic procedures provided to members of the public are largely unregulated because of serious flaws in the current legislation. Only treatments that fall directly under the definitions in the Local Government's Miscellaneous Provisions Act 1982 can be registered in most areas in England. Newer aesthetic non-surgical cosmetic procedures are frequently created and often fall outside the scope of the original definition of regulated procedures. This means that many become effectively unregulated.

There are currently several voluntary registers of practitioners and approved education and training providers. However, these are not mandatory for practitioners to join, which means that there are many un-qualified practitioners providing procedures directly to members of the public without any checks. Furthermore, the current registration regime does not specify the level or type of training that practitioners should complete before starting to perform aesthetic non-surgical cosmetic procedures. Ofqual has also advised the JCCP that they are not empowered to require a regulated Awarding Body to evidence that their qualification is compliant with an industry standard, in the absence of this being mandated by the Government. We are also concerned that there is no legal requirement for all practitioners, to have relevant and appropriate insurance cover for aesthetic non-surgical cosmetic procedures that they provide to members of the public. Having an adequate insurance cover for all these procedures is a key public protection requirement.

Last but not least, we would also like to see the Department commission a public awareness raising campaign on this issue as well as the collection of national datasets to monitor the number of adverse effects and complaints from the public due to malpractice in this sector. The Royal Society of Public Health found that two thirds of respondents had not checked whether the technician was registered with their local councils. An awareness campaign would help with public's understanding of how to make the necessary checks and where to report malpractice when things go wrong.

We would be delighted to discuss this further with you and look forward to hearing how we may be able to work together to design a better regulatory system to protect public health.

Yours sincerely,




Dr Phil James, CEO, Chartered Institute of Environmental Health



Christina Marriott, CEO, Royal Society for Public Health



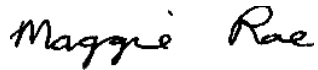
Dan Davies, Chairman, Institute of Licensing



Professor David Sines CBE, Executive Chair, JCCP



Nicola Close, Executive Group, UK Public Health Network



Maggie Rae, President, Faculty of Public Health



Ashton Collins, Director, Save Face



Caroline Larissey, Quality and Standards Director, National Hair and Beauty Federation (NHBF)



Diane Hey, Hair and Beauty Industry Authority (HABIA)



Victoria Brownlie, Chief Policy Officer, British Beauty Council



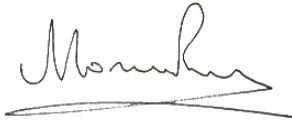
Lesley Blair, Chair, British Association of Beauty Therapy & Cosmetology (BABTAC)



Sallie Berkerey, Managing Director, Cosmetic Executive Women UK (CEW UK)



Dr Emma Meredith, Director-General, Cosmetic, Toiletry and Perfumery Association (CTPA)



Monica Price, Chief Executive Officer, Federation of Holistic Therapists (FHT)



Helena Grzesk, Public Affairs UK Spa Association (UKSA)

Federation of Nails Professionals

Hair and Beauty Supplier Association (HBSA)