

RSPH response to Consultation on the Regulation of Non-Surgical Cosmetic Procedures in Scotland

1. Do you agree that further regulation of non-surgical cosmetic procedures is needed?

Yes, RSPH strongly supports the introduction of further regulation of non-surgical cosmetic procedures. Our 2019 report, [Skins and Needles](#), investigated the infection control risks of special procedures (tattoos, piercing, electrolysis and acupuncture), and highlighted the need for greater regulation.

There is currently no legal requirement for technicians delivering non-surgical cosmetic procedures to hold an infection control qualification. There is also no legislation covering other equally invasive treatments, such as dermal fillers.

Our research, based on a national survey of people who had at least one special procedure in the previous five years, found that of those who reported having had a negative side effect, one in ten required medical treatment.

2. Do you agree that the carrying out of non-surgical cosmetic procedures (that pierce/penetrate the skin) by individuals who are not qualified healthcare professionals should be licenced under Part 1 of the Civic Government (Scotland) Act 1982?

Yes, RSPH strongly supports this. Our research in 2019 found that anyone can purchase specialist equipment online to carry out tattooing or piercings without the necessary training or qualifications in how to use them. Two fifths of people who had a special procedure did not check whether the person carrying it out was registered or licenced to carry it out. We would recommend that along with licensing, there should be the introduction of a mandatory infection control qualification as part of the licensing process.

3. Do you agree that services provided by pharmacists who undertake independent healthcare practices (including non-surgical cosmetic procedures), outwith the terms of an NHS contract should be regulated by Healthcare Improvement Scotland?

Yes, we would support this change in regulation. Further regulation would help to raise standards of practice as well as to help understand the demand for these services.

4. Do you have any other comments?

RSPH welcomes these proposals and would be keen to support the Scottish Government in bringing in legislative change in this area. In 2019 we launched a [Level 2 Award in Infection Prevention and Control for Special Procedures Practitioners](#). We believe the Scottish Government should consider mandating courses such as this for practitioners, and we are open to supporting this to happen.