
Feature Article

Self Regulation...Is It The Answer? The Low-Down on The Save Face Register of Accredited Non-Surgical Cosmetic Providers

In April 2013, a [Review of the Regulation of Cosmetic Interventions in England](#) led by Professor Sir Bruce Keogh, the NHS Medical Director, reported that **“previous attempts at self-regulation in the industry have failed, largely because voluntary codes have meant that only the best in this disparate sector commit themselves to better practice, whilst the unscrupulous and unsafe carry on as before”**.

It cited the creation of the Treatments You Can Trust (TYCT) voluntary register of cosmetic injectable providers in 2010, which was backed by the Department of Health. This was run by the Independent Healthcare Advisory Service (IHAS), a trade association for private healthcare and cosmetic surgery providers, but which Keogh claimed had *“attained limited support from the sector”*, had raised concerns about whether it was an *“appropriate organisation to run an independent register”* and which from a consumer perspective *“awareness of the register was low”*.



The committee behind the Keogh review stated that; *“people undergoing non surgical treatments should be able to be confident that their practitioner has the required skill and expertise to undertake the procedure successfully and safely”*.

They went on to say; *“anyone prescribing fillers, or performing other potentially harmful non surgical cosmetic procedures, should be accountable to a professional regulator”*, they believed this recommendation to be *“reasonable and proportionate, given the failure of self regulation and the potential for harm”*.

Thus *Recommendation 7* of the Keogh Report published as:

All practitioners must be registered centrally. The register should be independent of particular professional groups or commercial bodies, and should be funded through registration fees.

A response from the Government to Keogh’s 40 recommendations for the cosmetic interventions sector was published almost a full year later in February 2014.

It gave a significant hint within the introductory pages that statutory regulation was simply not on the cards and that the industry would have to revert to keeping its own ship in order again, by stating; *“the Department of Health will look to strengthen standards through training and qualifications and how far supervision from regulated professionals can **support self-regulation of the sector**”*.

When addressing *Recommendation 7* directly, the Government responded by saying; *“we do not believe that a new regulated profession is the only way of improving patient safety by practitioners of non-surgical cosmetic interventions. Many practitioners of non-surgical cosmetic interventions – nurses, dentists and doctors – are already on professional registers”*.

The industry therefore had no choice but to conclude that the Government had neither the appetite for, nor a plan to create its own mandatory, central register for non-surgical cosmetic providers, much like it had abolished the statutory requirement for a register of laser and IPL treatment providers in October 2010. With one ‘failed’ self-regulatory register under its belt, and nothing mandatory from government, what was to happen to the non-surgical medical aesthetic marketplace now?

(Let’s not even discuss the fact that Keogh and the government are happy for non-healthcare professionals to operate in this marketplace and have mandated Health Education England to make that ‘happen’ appropriately.)



Well, it seems that some within the industry got their thinking caps on and the *Save Face* register was launched in the summer of 2014. The [Save Face](#) register is only open to registered doctors, dentists and nurses who can demonstrate that they are insured and have received certified training.

With the past 'failings' and reflective industry sentiment, The Consulting Room conducted a survey of UK doctor and nurse-led cosmetic clinics to uncover their feelings on self-regulation of the sector as a whole.

The quick poll covered thoughts on the development of the Save Face register, following the apparent demise of the Treatments You Can Trust scheme, as well as the general appetite for self-regulation as a solution for monitoring standards and improving patient safety within the aesthetic industry.

Respondents (of which there were 18) showed an even split of 47% who were already CQC registered clinics and 53% who did not carry out any registerable services in accordance with UK regulators.

89% had never been registered with Treatments You Can Trust, with comments as to why not including "it's a waste of time and money", "it has no powers regarding regulation of the industry" and "I see no commercial advantage".

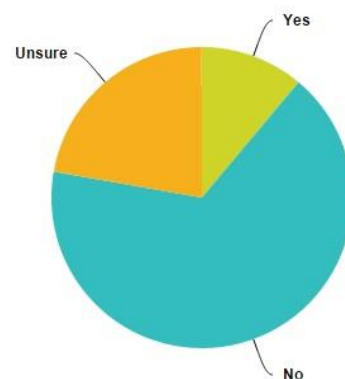
When asked if they thought voluntary, self-regulation schemes and registers are the answer to regulating the non-surgical cosmetic interventions sector, 67% said no, 11% said yes and 22% were unsure.

Many pointed to statutory legislation rather than voluntary regulation but others noted it was 'a start' when the government had shown a clear disinterest in regulating aesthetic providers.

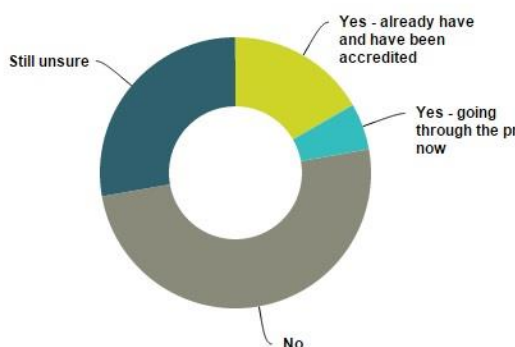
The biggest concern with the concept of any self-regulation scheme for the sector was the voluntary, rather than mandatory status of it. This was closely followed by whether or not it would stop the 'cowboys' and improve patient safety, why it was even needed and who was doing the inspecting or accrediting.

When it comes to who should be running a self-regulatory scheme, the results of the survey were not surprising, with 41% citing a government regulator such as the CQC, 23% a medical regulator such as the GMC or NMC, 18% a professional trade body such as BCAM or BACN, 12% an independent not-for-profit organisation and 6% an independent commercial organisation.

The Keogh report (published in April 2013) highlighted gaps in the regulation of the cosmetic interventions sector, particularly non-surgical services where the TYCT scheme was listed as a failure. Do you think voluntary, self-regulation schemes / registers are the answer?



Will you be joining Save Face (www.saveface.co.uk), the newly launched voluntary, independent and impartial accreditation scheme for aesthetic medical professionals (doctors, nurses and dentists) and clinics?



Despite the low vote for a commercial organisation, one respondent did acknowledge that for a self-regulation scheme to 'work' investment is required to inform the consumer, something which can only come from a commercial operation.

47% thought it possible or likely that joining a self-regulatory accreditation scheme would make a difference to their practising standards, but the other 53% were confident that they practice to a high standard already, and in many cases are inspected by a government regulator who scrutinises their practice, so felt they do not need additional verification of the fact.

Of those who responded to our short survey, half said that they would not be joining Save Face, 28% were still unsure, 17% had already joined and been accredited and 5% were in the process of accreditation. Many respondents were yet to be convinced that

it would be worth the money or that consumer awareness would reach suitable levels.

In order to answer the critics, and perhaps clear up some of the misconceptions surrounding this new approach to self-regulation within the aesthetic industry, and how the newly introduced Save Face scheme will work, I took the opportunity to talk to one of its Clinical Directors, Emma Davies.

Lorna: So, tell us, what exactly is Save Face?

Emma: Save Face is in response to the government response to Keogh. It has been launched as a means for the consumer to navigate aesthetic medicine, and to find practitioners that have been verified and accredited against a set of standards, so it gives them an extra degree of confidence. It also gives the practitioners a way of differentiating themselves from those practitioners out there who are not nurses, doctors and dentists, who have not undertaken training, and who may or may not be using products that have been recognised as safe and appropriate to use.

L: The Keogh Report was published in April 2013 and then followed by a government response. Keogh was very critical of the sector, and in particular the failings of the previous voluntary register, Treatments You Can Trust. What do you say to those people who say “*this is just another clone of TYCT*”?

E: It's very, very different to Treatments You Can Trust in a multitude of ways. The standards with Save Face are completely transparent, so it's clear to the consumer as well about what standards these practitioners have been measured against. They're quite objective standards based on keeping both the consumer and the practitioner safe. We provide a number of means of support to help the practitioners that are registering with us ensure they meet those standards. If they fall short in any way we support them to meet the standards so it's not just a tick box exercise.

We verify everything we can before they qualify, and then every clinic is visited and every practitioner is interviewed. This looks at all of the standards you would expect: infection control, medicines management, confidentiality, complaints, but also the quality of the consent process and the information provided to the patient, follow-up, after-care etc.

Save Face also gives the consumer a voice because we encourage and facilitate consumer feedback on their experiences.

It's much more supportive and much more hands on than Treatments You Can Trust was.

L: Who is doing the accrediting, the inspecting for Save Face?

We have a team of 50 registered nurses and we considered very carefully what qualities and qualifications the assessors should have. We decided that they should not be aesthetic practitioners because we wished to avoid any conflict of interest and any pre-conceived judgement. They do of course need clinical experience and an understanding of issues like infection control and risk assessment.

We've given them training and a structured process to go through so that it can remain very clear, very transparent and very objective. Their remit is to be supportive, not to be punitive in any way. Most people registering with us find that to be a very helpful and positive experience rather than one that they suffer through and sweat through.



Emma Davies, Save Face Clinical Director

Emma Davies is a Registered Nurse specialising in cosmetic medicine since 1998. Aside from a busy clinical practice in Somerset, Emma has actively participated on a number of committees and boards contributing to standards and education in this specialist field; including the Royal College of Nursing (RCN) Aesthetic Nurses Forum Committee, The British Association of Sclerotherapists and The British Association of Cosmetic Nurses (BACN) which she co-founded and Chaired until April 2014.

She has contributed to a number of seminal documents including The BACN Standards of Competency for Nurses in Aesthetic Medicine, accredited by The RCN and referenced internationally.

In 2012 she was awarded both 'Aesthetic Nurse of The Year' and the 'Services to Industry Award' by Cosmetic News Magazine (voted by peers).

L: Obviously the bottom line with all of this is that it is a voluntary register. This is the industry self-regulating itself. What do you say to those people who say “*well those who really need regulating won't be signing up to this so what's the point?*”

E: Well the government have clearly said that they are not going to instigate any further legislation or statutory regulation specific to this field, that there is enough regulation already out there.

The problem we all recognise is that there may be enough regulation but there's no policing of it; there's no money from the government to do any more on that front. So that's where we at Save Face are coming in.

Although it's voluntary, and I'll come back to that, it isn't going to include people who don't have an NMC, GMC and GDC registration. They're going to fall outside of the register.

What it's going to do is provide a signpost to the consumer who cares about who is treating them and who cares about how they're being treated; it's going to give them a means to find the practitioners that meet their requirements with confidence. I think that is going to leave those outside of the register in a space that might not be so conducive to them.

L: At the end of the day you are protecting or aiming to protect the public from un-safe practitioners simply by only allowing doctors, dentists and nurses to join the Save Face Register?

E: Yes. And really it is just that, it's a self-regulation. It's saying we want to meet these standards and we want external verification, or independent verification that we have achieved them. Those consumers who are anxious and feel vulnerable and need help choosing a practitioner, we're there for them. We can't help those who don't care where they go, that think it is fine to have a 'Botox' party, and don't ask who is treating them or who don't mind being treated by their friend. We can't help those people, but we're about the people who do care about their own safety.

L: There will be those people out there who are critical of this, and just see it as just another badge, another thing that they have to spend money on. They will say that Treatments You Can Trust didn't work, so what's to say this won't be 'here today, gone tomorrow', and they have ploughed money into it and it was a waste of time. What do you say to them?

E: Well it won't be a waste of time. This is a very strong focused effort, and the company Save Face have got significant money to invest in this, and are very invested in it being successful. So we're here for the long haul.

Of course, if people don't support it, and don't sign up, for whatever reason, then it will go away, and then there won't be anything that follows it because if with all of this effort and focus it's not supported then really what that is saying is that the field actually doesn't want to have any more regulation, or doesn't need it. And that will be that.

L: You mentioned the Save Face 'company'. Obviously it's a commercial organisation. There are those out there who say this (self-regulation) shouldn't be run by a commercial organisation, that it should be a not-for-profit situation, what do you say about that?

E: Well that's an interesting one. Part of me agrees, the ideal would be that it was not-for-profit, that it was government led and that it was supported by all of the professional bodies. But in reality, government are not pro-intervention, they are pro self-regulation and the professional bodies don't have the funding or the resources to bring this together.

Having worked for Save Face I really appreciate what a massive investment and risk it is, and in order to do it properly, and be truly independent of all of the political and professional agendas that are out there, this actually is the best model and I'm absolutely convinced of that now.

It has to be a commercial company, but it has to be one who is led by professionals representing all of the professional bodies and all of the agendas. It has to be led by those, but it needs private money.

L: There are clinics out there which will already be registered with the CQC and obviously equivalent regulators in Wales, Northern Ireland and Scotland; they already get inspected, they already know their standards are high according to the inspections that those organisations are carrying out, so they're probably thinking '*why do I need this as well?*'

E: Well they need this as well because the CQC actually doesn't regulate cosmetic, non-surgical services.

I would be inclined to agree that any clinic that goes through the CQC process is likely to meet all of our standards with bells on, but that doesn't help the consumer navigate their way to them. The CQC doesn't signpost the consumer to them as a cosmetic non-surgical provider.

Also in some cases, and I have been to clinics that are CQC registered, the non-surgical cosmetic side of their business clearly isn't of the standard that the CQC would require for the medical side. So it's an expense they have to pay for legal reasons, for their medical services, but it doesn't translate across to their non-surgical cosmetic services necessarily. Most importantly though the bottom line is it doesn't help the consumer navigate to them, for their non-surgical services.

L: Medical practitioners, doctors and the nurses will already be going through re-validation processes with the GMC and the NMC. They're likely also to be members of professional organisations such as BCAM, BACN etc. plus regularly attending CPD validating events. So perhaps some of them will be thinking '*do I really need any further vetting or accreditation of my skills?*'

E: Well that's a decision for them to make, but you have to acknowledge that the GMC re-validation which is quite robust, might only be looking at their NHS practice and not their cosmetic practice, unless they are registered with BCAM and not every cosmetic doctor is. Some are more part-time than full-time in aesthetics and might choose not to be. Plus with the revalidation process BCAM and the GMC aren't inspecting the premises and they aren't looking at those broader standards that we (at Save Face) are. Again it's also about signposting the consumer and educating the consumer. That is an additional role we take on.

L: In terms of the cost of Save Face, everything in business comes down to the expense. Clinicians are perhaps thinking that they're already paying the CQC and this is just another expense. They may also be thinking that they're competing with 'practitioners' out there who are doing everything on the cheap, who aren't going to register and pay the money to be part of this. They perceive their standards to be high so wonder if they need to spend extra money on Save Face. What is your response?

E: Well it's on average about £800 to register with us.

I would say those people know their standards are high, but the consumer has to just take their word for it because they cannot know. I can sit before a patient and tell them who I am, how qualified I am, how experienced I am and about all of the extra-curricular activities I do to inspire confidence in them; but I know I could just be making that up. The consumer is having to take everything on trust.

I like the idea that a body like Save Face verifies the information I'm providing, and although its £800, that's a lot less than the CQC registration, which is a government sponsored statutory body.

For the registration fee we also support with marketing and PR, with policies and procedures, which we provide, we're developing consent templates and we provide discounts on particular services. We've got lots of added value which in and of itself is worth the sign-up fee I would say. Those that can't afford it are perhaps not invested enough in aesthetic medicine to warrant joining the register.

L: What can a clinic expect in terms of the process? How does this work from the moment they pick up the telephone to Save Face and say '*I want to register?*'

E: Well before that they can look at the standards and they can download a checklist which tells them exactly what the process involves and exactly how they might need to prepare for it. Interestingly the biggest challenge for people is getting all of their certificates together to evidence their training, and that's probably the most time consuming part, which ironically is exactly what they need to do in preparation for revalidation as an example.

They then go online and pay a pre-registration fee which covers the cost of office staff verifying all of their documentation, which includes their training certificates for each of the treatments they provide, their insurance, their basic life support update, last training, and examples of their patient information and consent forms.

That's all then checked in the office and once that's been verified they can make an appointment for the assessor to come and do an on-site visit, which takes up about an hour of their time, and involves checking the standards in the clinic against the standards we have. Also an interview, which basically requires them to go through a consultation and consent process with the assessor; and that's it.

If that's all up to standard then they join the register. If there are areas in need of improvement then they are given guidance notes and a time frame is agreed for them to make those improvements before going live on the register.

So it's not necessarily a straight pass or fail, sometimes there is a time frame allowed for improvements to be made.

L: One of the problems with Treatments You Can Trust was that, for all that they tried, the public didn't really know about it. What are Save Face going to be doing in terms of raising public awareness of their register?

E: Well, this is the biggest financial investment that Save Face is actually making, in raising brand awareness amongst the consumers.

Of course, apart from the satisfaction, quiet satisfaction of knowing you've been externally validated the consumer needs to be valuing this as well for it to work. So we've got a very comprehensive media campaign, launched in October, and it includes pay-per-click advertising and banners on key websites. It includes local PR campaigns where our PR company works with the individual clinicians that are signing up to create a local story around them, and push it to the local press and that's doing very well.

We have a national campaign and are preparing top magazines and newspapers articles. We have some television programmes where we're going to having a presence and a voice coming up, and very excitingly we have a campaign that is going on London Underground for the Christmas and January sales periods, so from two weeks before Christmas until three weeks after. This will involve, I think, 200 stations, 1,000 carriages plus escalators and platforms. So there will be a huge presence, when over 16,000,000 visitors will be on those tube trains in London.

L: So Save Face will be in your face on the London Underground!

E: Yes, we're really committed to making this a brand that people recognise and look for.

L: What do you say to those out there who are still 'umming and ahing' about Save Face registration? What are the key drivers that they need to take home today?

E: I think post-Keogh we were all very disappointed and felt a bit adrift. For myself I thought if anything else we need a register, whatever our qualifications and experience, without this the consumer cannot differentiate between us and the beauty therapists and the physiotherapists and the other professionals that are providing those non-surgical cosmetic services. Plus we have no benchmark for us to be measured against.

So Save Face is a register that makes it real, that really does check everything that can possibly and reasonably be checked. It is also a means for support and guidance for those practitioners on the register, to review their practice. It supports them in revalidation, it supports them in professional development and it makes them all safer.

So even if we think we tick all the boxes, going through that process helps us identify areas of risk, which is good for everybody. I think it does tick all of the boxes and if it's not supported then I think we're going to be living with business pretty much as usual.

For more information about Save Face, please call 01495 239261 or visit www.saveface.co.uk.



Lorna Jackson

Lorna has been Editor of The Consulting Room™, the UK's largest aesthetic information website, for over a decade, since 2003. She has become an industry commentator on a number of different areas related to the aesthetic industry, collating and evaluating statistics, plus researching, investigating and writing feature articles, blogs, newsletters and reports for The Consulting Room™ and various consumer and trade publications, including *Cosmetic News*, *Journal of Aesthetic Nursing*, *Body Language*, *PMFA News*, *Aesthetic Medicine* and *Aesthetic Dentistry Today*. Lorna has also been asked to present at various industry events, including Smart Ideas, BACN and Merz Aesthetics Business Workshops, the FACE Conference and the Clinical, Cosmetic & Reconstructive Expo.

Lorna was recently awarded *Journalist of the Year* at the MyFaceMyBody Awards 2014.