

1. Impact of the Bill

(a) People wishing to access non-surgical procedures detailed in Schedule 1

The Bill will likely improve overall patient safety and confidence in accessing these procedures. By restricting delivery to “permitted premises” managed by appropriately regulated healthcare professionals—doctors, dentists, and nurse independent prescribers—the public can be assured that treatments are being provided in a clinical environment that meets safety, hygiene, and governance standards.

While some individuals may find access more limited initially, particularly in areas where unregulated providers currently operate, this is a necessary and proportionate step to protect patients from unsafe practices. Accessibility should not come at the expense of safety.

(b) The level of risk to people who wish to access these procedures

The Bill will significantly reduce risk. Currently, non-surgical cosmetic interventions are often delivered by individuals with variable or inadequate training, sometimes in unsuitable premises. Restricting these procedures to HIS-registered settings and qualified healthcare professionals introduces essential safeguards—clinical assessment, informed consent, management of complications, and access to emergency care.

This framework will also ensure that practitioners have the pharmacological knowledge and clinical judgement necessary for safe prescribing and treatment delivery—skills uniquely held by doctors, dentists, and nurse prescribers.

(c) Local businesses and individual practitioners

Some non-medical practitioners and unregulated businesses may be adversely affected, particularly those who cannot meet HIS standards or lack appropriate qualifications. However, from a patient safety perspective, this is a justified outcome. The Bill prioritises protection over commercial interest.

It will encourage professionalisation of the aesthetics sector, driving practitioners to undertake recognised clinical training or collaborate with qualified prescribers in regulated premises. In the long term, this shift will strengthen the credibility and safety of the medical aesthetic sector.

(d) Organisations and staff who currently operate within premises that meet the definition of permitted premises

For organisations already meeting HIS registration requirements and operating under the supervision of doctors, dentists, or nurse prescribers, the Bill will reinforce existing standards rather than create major disruption. These providers are already delivering care within appropriate governance frameworks, so compliance should be straightforward.

The Bill may also enhance their reputation and patient trust by distinguishing legitimate medical-led services from unregulated operators.

2. Views on Inspection, Offences, and Enforcement Powers

The inspection and enforcement powers outlined are both fair and essential. Patient safety depends on active oversight. HIS should be adequately resourced to conduct regular inspections, enforce compliance, and respond to public complaints effectively.

Criminalising the provision of Schedule 1 procedures outside of permitted premises or to individuals under 18 is a proportionate response given the potential for serious harm. These offences serve as a strong deterrent against unsafe practice and reinforce public confidence that this is a clinically governed area of healthcare, not a beauty trend.

3. Further Comments on Part 1 of the Bill

We strongly support the principles of the Bill, particularly its clear alignment with medical regulation and patient protection.

To further strengthen safety, we recommend:

- Mandatory clinical oversight by doctors, dentists, or nurse independent prescribers for all Schedule 1 procedures.
- A national public register of HIS-registered premises and approved practitioners to improve transparency and patient choice.
- Robust data collection and incident reporting, allowing HIS to monitor adverse events and inform ongoing policy refinement.

Ultimately, the Bill marks a critical step toward protecting the public from unsafe, non-medically led cosmetic procedures and ensuring that all aesthetic interventions are delivered within a culture of patient safety, clinical accountability, and professional integrity.