

15 December 2025

Via email to: HSCS.committee@parliament.scot

Dear Committee members

Follow up to appearance at the Health, Social Care and Sport Committee on 9 December 2025

Thank you for the opportunity for Healthcare Improvement Scotland (HIS) to give evidence on 9 December 2025 as part of the Committee's Stage 1 scrutiny of the Non-Surgical Procedures and Functions of Medical Reviewers (Scotland) Bill.

We now write to seek clarity on the Bill's intention to only allow Non-Surgical Procedures (NSPs) to be provided from fixed premises, as per the 'permitted premises' provision of the Bill.

HIS regulates independent medical agencies (IMA) as part of its regulatory role, and as such we have developed an inclusion and exclusion criteria for what can reasonably be considered an IMA. The largest volume anticipated for IMAs is in relation to online and digital services; others include peripatetic services and those that utilise live models and deliver 'treatment' as part of educational demonstrations. There is a potential that a registered IMA could be a perceived 'loophole' in the legislation and may allow NSPs to take place in premises that were intended to be prohibited, i.e. in an individual's own home or mobile services.

The following examples may be considered an IMA where there is a possibility of NSPs being undertaken, from regulated services that are not defined as fixed premises:

- *I am a clinician that runs a company that provides training and education for healthcare professionals in a range of areas. I do not have a fixed premises that my clients attend. I use temporary premises in a range of settings. As a part of the training and education, we treat consenting patients as a demonstration or to allow the observed practice of trainees.*
- *I am a clinician that visits Scotland and provides non-surgical aesthetic treatments to attendees at exhibitions, events and shows. I do not have my own premises in Scotland. I work*

with the promoter to create temporary clinic area in the exhibition centre, hotel or other venue secured by the promoter of the event.

Consideration should be given if these types of activities are intended to be prohibited as part of the proposals. This would further support the principles of the Bill, to prohibit Non-Surgical Procedures being provided from hospitality or exhibition venues.

Yours sincerely



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Laura Boyce

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