

From: Thomas Kelly

Sent: 03 December 2025 22:08

To: Health, Social Care and Sport

Subject: Enforcement Powers under the Bill – Procedures Conducted in Private Homes

Dear Members of the Health, Social Care and Sport Committee,

I wish to raise an additional concern regarding the Non-Surgical Procedures and Functions of Medical Reviewers (Scotland) Bill, specifically in relation to the enforcement of procedures carried out in private homes.

At present, the Bill does not appear to contain any clear provision or mechanism to prevent or regulate non-surgical cosmetic procedures being undertaken in domestic settings. This represents a serious public safety risk, particularly given the rising number of unregistered and mobile practitioners operating from private homes or visiting clients' residences.

I would therefore be grateful if the Committee could clarify:

1.

What powers, if any, Healthcare Improvement Scotland (HIS) would have to investigate, enter, or take enforcement action against individuals carrying out procedures in private homes under the proposed legislation.

2.

Whether there are any plans to explicitly prohibit the performance of invasive procedures in non-clinical or domestic environments.

3.

If not, how the Scottish Government intends to ensure public protection from the clear infection control, safeguarding, and clinical governance risks associated with this type of practice.

It is essential that any regulatory framework provides practical, enforceable measures that extend beyond formal premises and address where much of the unregulated activity actually takes place. Without this, the Bill risks focusing on compliant businesses while leaving a large part of the sector — and therefore the public — unprotected.

Thank you for your continued attention to these issues.

Kind regards,

Thomas Kelly

Sent from my iPhone