

Health, Social Care and Sport Committee:

[The Civic Government \(Scotland\) Act 1982 \(Licensing of Non-surgical Procedures\) Order 2026](#)

I refer to the recent consultation regarding the proposed new Order in respect of Licensing of Non-surgical Procedures.

In general, we support the inclusion of the non-surgical procedures within the licensing framework however we would make the following observations:

- New responsibilities and duties

These are new activities that local authorities have had no experience in assessing the risks associated.

- Any resources required

This could introduce a number of premises that require to be licensed and there are proposals to provide funding for the administration, inspection and training requirements for local authorities.

- Public awareness and information

A general public awareness campaign should be carried out to show which procedures require to be licensed and which are and will come under the remit of HIS.

- Provision of information for businesses on compliance

Resources will also be required to ensure businesses are aware of the standards that will be required to comply, and to make sure they understand the costs etc for licensing.

- Specific non-surgical aesthetic procedures allowed under the scheme

Officers will need to have training to understand the risks associated with the procedures that require to be licenced.

- Effect of the Order on rogue traders seeking to operate outwith the scheme or the NSP Bill provisions

The order does not give provision for fixed penalties etc and may result in the use of other legislation to prevent activities.

- Compliance and enforcement

There will be a need for additional resources to effectively monitor and ensure compliance within this sector.

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