

Citizen Participation and Public Petitions Committee  
Wednesday 8 October 2025  
15th Meeting, 2025 (Session 6)

## PE2137: Fair regulation for non-medical aesthetic injectors

### Introduction

**Petitioner** Jordan Morrison on behalf of Mr Skulpt Aesthetics Ltd

**Petition summary** Calling on the Scottish Parliament to urge the Scottish Government to introduce an aesthetics licensing scheme to ensure that non-medical practitioners meet training and safety standards.

**Webpage** <https://petitions.parliament.scot/petitions/PE2137>

1. [The Committee last considered this petition at its meeting on 5 March 2025](#). At that meeting, the Committee agreed to write to the Scottish Government.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new written submissions from the Scottish Government, which are set out in **Annexe C**.
4. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage](#).
5. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
6. [The Scottish Government gave its initial response to the petition on 24 January 2025](#).
7. Every petition collects signatures while it remains under consideration. At the time of writing, 5,298 signatures have been received on this petition.

### Action

8. The Committee is invited to consider what action it wishes to take.

**Clerks to the Committee**  
**October 2025**

## **Annexe A: Summary of petition**

### **PE2137: Fair regulation for non-medical aesthetic injectors**

#### **Petitioner**

Jordan Morrison on behalf of Mr Skulpt Aesthetics Ltd

#### **Date Lodged**

06 January 2025

#### **Petition summary**

Calling on the Scottish Parliament to urge the Scottish Government to introduce an aesthetics licensing scheme to ensure that non-medical practitioners meet training and safety standards.

#### **Background information**

Non-medical aesthetic injectors play a vital role in Scotland's beauty and wellness industry, offering accessible cosmetic treatments such as Botox and dermal fillers. While safety is paramount, banning these professionals is neither a practical nor fair solution. Instead, introducing robust regulation would ensure a higher standard of care while preserving consumer choice and protecting livelihoods.

A complete ban risks driving treatments underground, where unregulated and untrained individuals could operate without oversight, significantly increasing risks to public safety. By contrast, regulation would mandate accredited training, ongoing education, and adherence to strict safety protocols, ensuring injectors have the necessary knowledge to perform procedures responsibly.

Proper regulation, not prohibition, fosters a safer, more equitable industry while retaining the diversity of expertise and affordability that consumers value. Let us prioritise improvement over exclusion.

## **Annexe B: Extract from Official Report of last consideration of PE2137 on 5 March 2025**

**The Convener:** That brings us to the last of our new petitions this morning. PE2137, on fair regulation for non-medical aesthetic injectors, which has been lodged by Jordan Morrison of Mr Skulpt Aesthetics Ltd, calls on the Scottish Parliament to urge the Scottish Government to introduce an aesthetics licensing scheme to ensure that non-medical practitioners meet training and safety standards.

The petition argues that a complete ban on aesthetic injectors risks driving treatments underground, where unregulated and untrained individuals could operate without oversight, which would significantly increase the risks to public safety. The petitioner states that, by contrast, regulation would mandate accredited training, on-going education and adherence to strict safety protocols, thereby ensuring that injectors had the necessary knowledge to perform procedures responsibly.

The SPICe briefing explains that, currently, the only clinics that are regulated are those where qualified registered health professionals work; they are registered and inspected by Healthcare Improvement Scotland. A review of the regulation of cosmetic interventions recognised that, because many procedures are not fully covered by existing regulatory frameworks, anyone can purchase and administer products, despite the potential for significant harm.

The Scottish Government consulted on the regulation of non-surgical procedures that pierce or penetrate the skin in 2020, and the analysis was published in 2022, with the Scottish Government indicating that it might introduce a licensing scheme for all practitioners who carry out such work. However, that did not happen.

In its response to the petition, the Scottish Government states that its most recent consultation, which closed on 14 February, builds on the 2020 consultation by putting forward more detailed proposals for what further regulation could look like. It also states that the consultation does not propose a ban on non-healthcare professional practitioners performing injections of Botox or dermal fillers; instead, it is proposed that certain procedures should be undertaken in a premises regulated by Healthcare Improvement Scotland, and that they should be undertaken by a trained practitioner working under the supervision of an appropriate healthcare professional, who would be available to prescribe any prescription-only medicines that might be required in the procedure or to support the management of any complications.

The Government will confirm any plans for legislation that might be required once the consultation responses have been analysed.

We have all been made aware, through the media, of one or two quite distressing examples of this issue manifesting itself. Do colleagues have any suggestions as to how we might proceed?

**Marie McNair:** I know that my colleague Stuart McMillan has done a lot of work on the issue, too.

I think that we should keep the petition open and write to the Scottish Government to seek a timeline for the publication of its consultation analysis and its work to bring forward regulation. We should also ask for an assessment of how its proposed groupings for procedures and the suggestion that Botox and dermal filler procedures be restricted to premises regulated by Healthcare Improvement Scotland would impact aesthetics businesses.

**The Convener:** I think that that is a very sensible suggestion. If there are no other suggestions, are we content to proceed on that basis?

**Members** *indicated agreement.*

**The Convener:** We will keep the petition open and proceed on the basis that has been suggested.

To those of you who have been enjoying the proceedings so much, I am afraid to say that that brings us to the conclusion of our meeting. Our next meeting will take place on 19 March. I thank everyone for their participation and for joining us today, and I formally close the meeting.

## **Annexe C: Written submissions**

### **Scottish Government written submission, 11 April 2025**

#### **PE2137/B: Fair regulation for non-medical aesthetic injectors**

Thank you for your letter dated 8 March 2025, following your consideration of petition PE2137 which called for fair regulation for non-medical aesthetic injectors.

The Committee requested:

- a timeline for the publication of the consultation analysis and the work to bring forward regulation
- an assessment of how the proposed groupings for procedures will impact aesthetic businesses, in particular the suggestion that Botox and dermal filler procedures could be restricted to premises regulated by Healthcare Improvement Scotland

The consultation closed on 14 February 2025 and the Scottish Government are currently analysing the over 2200 responses that were received. Subject to that analysis, the proposals will be refined and this includes reviewing the groupings of procedures. Decisions on what any legislation or regulation will look like have not been taken yet. We will publish the analysis and our response before Parliament's summer recess. Licensing or regulation of this sector is expected to require legislation to be put to the Scottish Parliament, and so any proposals will remain subject to parliamentary process.

In addition to the consultation, we have taken forward a number of engagement sessions with businesses working in this sector to gain further understanding of how our proposals might impact them; and are undertaking a Business and Regulatory Impact Assessment. The evidence collected will also inform our understanding of the impact on businesses.

I hope you find my response helpful and informative.

**Chief Operating Officer**

**NHS Scotland Directorate**

### **Scottish Government written submission, 25 June 2025**

#### **PE2137/C: Fair regulation for non-medical aesthetic injectors**

Given the Citizen Participation and Public Petitions Committee's consideration of Petition PE2137 and the correspondence on this matter, I am writing to inform you that the analysis of the recent consultation on regulation of non-surgical cosmetic procedures, and Scottish Government's planned next steps has been published today. The report can be found [here](#).

As set out in the 2025-26 Programme for Government, a Non-surgical Cosmetic Procedures Bill will be introduced to the Scottish Parliament in Year 5. We propose

that the Bill will ensure that many non-surgical cosmetic procedures are undertaken by or under the supervision of a healthcare professional, and in most cases in a setting regulated by Healthcare Improvement Scotland. In addition, we will pursue secondary legislation under the Civic Government (Scotland) Act 1982 to establish a local authority licensing regime for procedures which do not require the input of a healthcare professional. Further details are available in the report.

Further engagement is also taking place with businesses through an additional Business and Regulatory Impact Assessment survey, which will invite businesses to report on the potential impact of these revised proposals. This will be sent directly to businesses that responded to the recent consultation.

I trust this is a helpful update on our previous correspondence.

**NHS Scotland Directorate**