

Accreditation renewal report

Standards 1-8

Save Face

June 2024

Contents

| | |
|---|----|
| About accreditation..... | 3 |
| The Outcome..... | 4 |
| About the Register..... | 6 |
| Assessment against the Standards | 11 |
| Share your experience | 22 |
| Impact assessment (including Equalities impact) | 22 |

About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers¹ (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework². More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One³.

We used the following in our assessment of Save Face:

- Documentary review of evidence of benefits and risk supplied by Save Face and gathered through desk research
- Documentary review of evidence supplied by Save Face and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Assessment of Save Face’s complaints procedures.

¹ https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

The Outcome

The Accreditation Panel met on 19 March 2024 to consider Save Face. The Panel was satisfied that Save Face met or could meet with Conditions all the Standards for Accredited Registers.

We therefore decided to accredit Save Face with Conditions

We noted the following **positive findings**:

- Save Face's accreditation standards reference legislation, regulation, professional standards, and best practice standards, ensuring public and clinician safety.
- Save Face engages in effective communication through its website, social media, and media campaigns, promoting awareness of health issues and safe practices in cosmetic treatments.
- Save Face works with statutory regulators to oversee the conduct of its registrants, providing an additional layer of oversight and accountability.
- Save Face is recognised by the Department of Health and Social Care, NHS Choices, and NHS England, and it has contributed to the proposed licensing scheme for non-surgical cosmetic procedures in England.
- Save Face has acted promptly to address matters raised throughout this assessment.

We issued the following Conditions to be implemented by the deadline given:

| Conditions | | Deadline |
|-------------------|--|------------------|
| Standard 2 | 1. Save Face is to ensure that its communications are not misleading by presenting a balanced view of consumer feedback, whether by allowing negative reviews on its register entries, or by communicating how these have been addressed by other means. | 27 December 2024 |
| Standard 4 | 2. Save Face should publish its Essential Curriculum to demonstrate how it assures the aesthetic competencies of its registrants. | 27 December 2024 |
| Standard 5 | 3. Save Face is to develop its processes to assure that parties to complaints are appropriately supported throughout the complaints process. | 27 December 2024 |
| | 4. Save Face is to develop mechanisms such as Indicative Sanctions guidance to assure that outcomes are consistent. | 27 December 2024 |

| | | |
|-------------------|--|------------------|
| Standard 6 | 5. Save Face must develop and publish its process for anyone to raise a concern or complaint about the Accredited Register. | 27 December 2024 |
| | 6. Save Face must develop a documented approach to risk management, for example development of an organisational risk register that is periodically updated and consider by its Directors/Board. | 27 December 2024 |

We issued the following Recommendations to be considered by the next review:

| Recommendations | | |
|------------------------|--|--|
| Standard 2 | 1. Save Face should publish the personal identification numbers (PINs) of registrants from their respective statutory regulators and provide links or general information within profile entries on how to check these regulators. | |
| Standard 4 | 2. Save Face should assure that its competency requirements, and further assurances such as its Essential Curriculum and assured qualifications, include competence in caring for a diverse population. | |
| Standard 6 | 3. Save Face should consider further ways to promote transparency, for example by published board minutes or excerpts relating to the Accredited Register and its public protection aims. | |

About the Register

This section provides an overview of the Save Face and its register.

| | |
|---|--|
| Name of Organisation | Save Face |
| Website | https://www.saveface.co.uk/ |
| Type of Organisation | Save Face is a Private Limited Company . Companies House: 8687253 Information Commissioners Office: ZA053461 |
| Role(s) covered | Save Face registers: Dentists, Doctors, Midwives, Nurses and Prescribing Pharmacists who provide non-surgical cosmetic treatments within private clinics that it has accredited throughout the United Kingdom. |
| Number of registrants | 851 as of 1 January 2024. |
| Overview of Governance | Save Face has three Directors (Chief Executive, Registrar, Clinical Director) and supporting operational staff. Save Face's Expert Advisory Board consists of nine professional members and one lay Patient Safety Ambassador. |
| Overview of the aims of the register | Save Face's Standards for Accreditation set out that the register aims to provide the following for the benefit of its registrants and the protection of the public: "The Save Face standards reference legislation, regulation, professional standards and best practice standards. Public and clinician safety and good customer care underpin each of them. Only regulated health care professionals, for whom aesthetic medicine is within scope, may apply for accreditation. Though our standards reflect our accreditation process (Those standards we can verify either by documentary evidence submitted, or with site inspection and clinician/staff interviews). The expectation that registrants will maintain the standards required by their regulatory bodies is explicit and Save Face will hold registrants accountable to these standards in addition to The Save Face standards included in this document. Our register signposts risk averse consumers to professional, safe and ethical medical aesthetic treatment providers. Applicants for accreditation should see the standards and |

| | |
|--|--|
| | process as a means to verify their practice does indeed meet best practice standards, or as a tool to support them to identify and manage risks in order to meet the standards.” |
|--|--|

Inherent risks of the practice

This section uses the criteria developed as part of the Authority’s *Right Touch Assurance tool*⁴ to give an overview of the work of non-surgical cosmetic practitioners.

| Risk criteria | Save face registrants/ aesthetic practitioner/ non-surgical cosmetic practitioners |
|--|--|
| <p>1. Scale of risk associated with Save face registrants/ aesthetic practitioner/ non-surgical cosmetic practitioners.</p> <p>a. <i>What do Save face registrants aesthetic practitioner/ non-surgical cosmetic practitioners do?</i></p> <p>b. <i>How many Save face registrants aesthetic practitioner/ non-surgical</i></p> | <p>a) The practitioners on Save Face’s register carry out a range of non-surgical cosmetic treatments including dermal fillers, botulinum toxin injections, chemical peels, medical skin needling and skin boosters. Save Face registrants are doctors, dentists, prescribing pharmacists, or nurses/midwives and must have appropriate professional registration.</p> <p>b) Save Face had 851 registered practitioners as of 1 January 2024.</p> <p>c) Save Face’s registrants mainly in private clinics that have passed its Accreditation Standards. Cosmetic procedures are generally not available in the NHS, except, for example, to treat conditions such as HIV-related lipoatrophy⁵.</p> <p>d) The Impact of Body Image on Mental and Physical Health report noted that: ‘The number of cosmetic treatments being carried out across the UK has risen considerably over the years and continues to do so. With a recent survey finding that 8% of adults (4% of men and 13% of women) had considered cosmetic procedures, fillers, or Botox because of their body image, the rise in body image dissatisfaction has driven a new market that to date has remained largely unregulated.’⁶ The report noted ‘overwhelming pressure on women, and more recently men, to conform to a particular beauty ideal that</p> |

⁴ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

⁵ [treating-hivrelated-lipoatrophy-by-injecting-a-nonabsorbable-gel-polymer-pdf-364620493 \(nice.org.uk\)](https://www.nice.org.uk/guidance/ta619/treating-hivrelated-lipoatrophy-by-injecting-a-nonabsorbable-gel-polymer-pdf-364620493)

⁶ The impact of body image on mental and physical health. Paragraph 99.

| | |
|--|---|
| <p><i>cosmetic practitioners are there?</i></p> <p>c. <i>Where do Save face registrants aesthetic practitioner/ non-surgical cosmetic practitioners work?</i></p> <p>d. <i>Size of actual/potential service user group</i></p> | <p>is portrayed by the media and magazines⁷. This suggests an expanding market of people seeking non-surgical and surgical cosmetic procedures.</p> <p>People seeking cosmetic treatments may be anyone who wishes to improve their <i>body image</i>, or '<i>how we think and feel about our bodies</i>'. Persistent causes of body image dissatisfaction have been noted to include:</p> <ul style="list-style-type: none"> • where lighter coloured skin is viewed as more desirable. • Weight stigma—those with a higher body and lower body weight than the average can be subject to prejudice and discrimination. • Exposure to media depicting unrealistic and narrowly defined appearance ideals. • Appearance-related bullying and/or sexual harassment. • Colourism—discrimination affecting people of colour • The emphasis on the importance of image/beauty in society.⁸ <p>At present, there are few regulatory controls as to who can access non-surgical and surgical cosmetic treatments. A recent change is the Botulinum Toxin and Cosmetic Fillers (Children) Act which means that (as of 1 October 2021):</p> <ol style="list-style-type: none"> 1. It is a criminal offence to administer botulinum toxin, or a filler, by way of injection, for a cosmetic purpose to a person under-18 in England. 2. It is an offence to decide for, or book an appointment to provide, these treatments to any person under-18 in England.⁹ |
| <p>2. Means of assurance</p> | <p>Save Face maintains a register of doctors, midwives, nurses, dentists and prescribing pharmacists who perform non-surgical cosmetic treatments. These practitioners may use non-protected titles such as 'Cosmetic Nurse/Doctor,' 'Cosmetic Specialist,' 'Cosmetic Practitioner,' or 'Cosmetic Dermatologist.'</p> |

⁷ The impact of body image on mental and physical health. Paragraph 100.

⁸ The impact of body image on mental and physical health. Paragraph 17.

⁹ https://www.gdc-uk.org/docs/default-source/standards-and-guidance/botulinum-toxin-and-cosmetic-fillers-children-act-factsheet06fb5217-348e-4cf9-810a-d09180d16dac.pdf?sfvrsn=df876e09_3

| | |
|---|---|
| | <p>Save Face only includes clinics on its register that have been assessed and meet its standards. Practitioner registration is valid only within their assessed clinics.</p> |
| <p>3. About the sector in which Save face registrants aesthetic practitioner/ non-surgical cosmetic practitioners operate</p> | <p>All practitioners providing treatments within a Save Face-accredited clinic must be statutory regulated healthcare professionals working within its framework of assurance.</p> <p>As highlighted by Save Face, the demand for cosmetic procedures continues to grow annually. The government has recognised the significant economic contribution of this sector and the career opportunities it provides, particularly for women, as noted by the All-Party Parliamentary Group (APPG) on Beauty, Aesthetics and Wellbeing. However, these procedures are not without risk. In the absence of statutory regulation, a professional register plays a vital role in ensuring consumer safety and upholding standards for clinicians who value robust governance and compliance structures.</p> |
| <p>4. Risk perception</p> <ul style="list-style-type: none"> • Need for public confidence in Save face registrant's aesthetic practitioner/ non-surgical cosmetic practitioners? • Need for assurance for employers or other stakeholders? | <p>All non-surgical cosmetic interventions performed by Save face registrants involve some risk of harm. The <i>Review of the Regulation of Cosmetic Interventions</i>¹⁰ highlighted those risks of physical harm exists in both 'lower' and 'higher' risk treatments: All laser and IPL treatments, for example, have the potential to cause scarring; skin melanocytes (cells that produce melanin) may be harmful and cause permanent hyper or depigmentation (unnaturally dark or light skin, loss of ability to tan). Exposure to laser irradiation may result in damage to the eye and vision, and there is a risk that clothing, hair, or oxygen tubes may be ignited by high intensity laser beams.</p> <p>As well as physical, there are psychological risks associated with non-surgical cosmetic treatments. People may feel compelled to undergo treatment if not appropriate, or necessary, and develop (or exacerbate) conditions such as Body Dysmorphic Disorder (BDD), a mental health condition characterized by a persistent and distressing preoccupation with perceived flaws or defects in one's appearance.</p> <p>Application of aesthetic treatments to people with BDD may</p> |

10

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/192028/Review_of_the_Regulation_of_Cosmetic_Interventions.pdf

| | |
|--|---|
| | <p>not be in their best interests where referral to mental health services is appropriate¹¹.</p> <p>Further risks include that of financial exploitation of people seeking to improve their appearance, and the use of unapproved or unregulated products that have not been appropriately sourced or prescribed. Such products may not meet safety standards, and their use can result in serious harm to patients, including infections, allergic reactions, or other adverse effects.</p> <p>The UK Government has committed to introduce a licensing scheme for non-surgical cosmetic procedures in England.</p> |
|--|---|

¹¹ Lane, Natalie M (2020). More than just filler: an empirically informed ethical analysis of non-surgical cosmetic procedures in body dysmorphic disorder. *Journal of Medical Ethics*, (), medethics-2019-105746– doi:10.1136/medethics-2019-105746

Assessment against the Standards

Standard One: Eligibility and ‘public interest test’

Summary

- 1.1 The Accreditation Panel found that Save Face’s register falls within the scope of the Accredited Registers programme.
- 1.2 The Accreditation Panel found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct and business practice, as required by Save Face.
- 1.3 We considered that non-surgical cosmetic treatments performed by Save Face registrants can be beneficial. We also considered that the risks associated with non-surgical cosmetic treatments performed by these registrants could be broadly mitigated by the arrangements it has in place.
- 1.4 The Accreditation Panel found that Standard One is met.

Accreditation Panel findings

Standard 1a: Eligibility

- 1.5 We considered whether the Save Face Register falls under the scope of our powers of accreditation as set out in Section 25E(1) of the National Health Service Reform and Health Care Professions Act 2002, making reference to the definition of a “voluntary register” set out at Section 25E.
- 1.6 Save Face operates a public register of practitioners who provide non-surgical cosmetic treatments within private clinics. Registrants on the Save Face Register are all regulated healthcare professionals.
- 1.7 The register is open to doctors, dentists, prescribing pharmacists, nurses and midwives who are registered with the General Medical Council (GMC), General Dental Council (GDC), General Pharmaceutical Council (GPhC), or Nursing and Midwifery Council (NMC) respectively.
- 1.8 We confirmed that Save Face meets the legal definition of a voluntary register. Practitioners offering non-surgical cosmetic treatments are not legally required to register with a professional body, and the titles they use are not protected by law.
- 1.9 Save Face registrants offer a variety of non-surgical cosmetic treatments, such as dermal fillers, botulinum toxin injections, chemical peels, and skin needling. Information about the treatments provided by registrants is published on its website¹².
- 1.10 The register was established in response to recommendations from Sir Bruce Keogh’s *Review of the Regulation of Cosmetic Interventions*¹³, aiming to provide an independent, professionally diverse, and financially self-sustaining register.

¹² <https://www.saveface.co.uk/en/category/treatment>

¹³ <https://www.gov.uk/government/publications/review-of-the-regulation-of-cosmetic-interventions>

- 1.11 Save Face highlights recognition by the Department of Health and Social Care, NHS Choices, and NHS England¹⁴. Save Face has contributed to the proposed licensing scheme for non-surgical cosmetic procedures in England¹⁵.
- 1.12 We found that the Save Face Register meets the criteria for a voluntary register under Section 25E(1) of the Act. This means that practitioners are not legally required to join, and the titles they use are not protected by law. Therefore, the Save Face Register could be considered for accreditation.

Standard 1b: Public interest test

The Accreditation Panel found that found that this part of the Standard is met.

i. Evidence that the activities carried out by registrants are likely to be beneficial.

- 1.13 We looked at evidence from Save Face to decide if the work of their registered practitioners was in the public interest. This included weighing the potential benefits and risks of non-surgical cosmetic treatments.
- 1.14 Save Face highlighted the potential benefits of cosmetic procedures, including improved self-confidence, self-esteem, and quality of life¹⁶. Research suggested these procedures can lead to greater patient satisfaction with their appearance and well-being. Some studies have also shown improvements in body image and reduced anxiety for patients with realistic expectations. Additionally, non-surgical treatments can be a less invasive and more affordable alternative to surgical cosmetic interventions.
- 1.15 However, we noted that some research claims regarding a universal improvement of mental health after cosmetic procedures lacked strong evidence. We also acknowledged that such treatments may not be effective for individuals with Body Dysmorphic Disorder (BDD)¹⁷.
- 1.16 Overall, we concluded that non-surgical cosmetic treatments can have benefits when performed correctly and safely. These benefits can be both physical and affect how people feel about themselves, potentially leading to better mental wellbeing for some. However, we noted more research was needed to understand the long-term effects on mental health.

ii. Evidence that any harms or risks likely to arise from the activities are justifiable and appropriately mitigated by the register's requirements for registration.

- 1.17 Save Face mitigates the risks associated with non-surgical cosmetic procedures by ensuring that treatments are only performed by qualified and regulated healthcare professionals. Save Face further strengthens safety through its accreditation process, assessing practitioners and inspecting clinics to ensure they meet the register's standards. These standards cover various

¹⁴ <https://www.saveface.co.uk/en/page/why-join-save-face>

¹⁵ <https://www.gov.uk/government/news/consultation-launched-into-unregulated-cosmetic-procedures>

¹⁶ For example, <https://jamanetwork.com/journals/jamadermatology/fullarticle/2696640>

¹⁷ [More than just filler: an empirically informed ethical analysis of non-surgical cosmetic procedures in body dysmorphic disorder - PubMed \(nih.gov\)](#)

risk areas, including infection control and informed consent. Additionally, practitioners must hold relevant qualifications and insurance.

- 1.18 Save Face also works with the professional regulators that oversee its registered practitioners, adding another layer of oversight and ensuring practitioners are held to high standards.
- 1.19 Save Face raises public awareness through targeted campaigns to educate potential patients about safe practices when considering cosmetic procedures.
- 1.20 We noted that Save Face should document risks related to boundary violations and exploitation within its risk register or standards of accreditation. Save Face confirmed this had been addressed, noted under Standard 7.
- 1.21 The UK government has announced plans to introduce a licensing system for providers of unregulated cosmetic procedures, such as botulinum toxins and dermal fillers in England. The details of this system, included in an amendment to the Health and Care Bill, was to be determined following public consultation.
- 1.22 We considered that Save Face's approach to mitigating risks for non-surgical cosmetic procedures aligned with the UK government's initiatives through accreditation, stakeholder collaboration, and public awareness. Save Face's advocacy for stricter regulations complemented the government's plans for licensing and qualified providers.

iii. Evidence of commitment to providing accurate information about treatments and services.

- 1.23 Save Face's accreditation standards require registrants not to make misleading claims. These standards require practitioners to comply with the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (the CAP Code)¹⁸. The CAP Code prohibits tactics such as making unsubstantiated claims about treatment effectiveness, downplaying potential risks, exploiting patient vulnerability, or targeting minors. Save Face further supports registrants by providing resources and guidance about the CAP Code. Additionally, its complaint handling process exists to address concerns about misleading advertising. If a complaint arises, Save Face advises the registrant of the issue, provides them with the CAP Code, and directs the complainant to the appropriate regulatory body.
- 1.24 Although Save Face has implemented measures to ensure quality, our review of practitioner websites revealed potential risks to be monitored. We considered that Save Face's checks of practitioners' websites, for example, should include checks for use of before-and-after photos that may not comply with ASA guidelines.
- 1.25 We found this part of the Standard was met.

¹⁸ <https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Condition and Recommendation:

Condition:

- Save Face is to ensure that its communications are not misleading by presenting a balanced view of consumer feedback, whether by allowing negative reviews on its register entries, or by communicating how these have been addressed by other means. This is to be implemented within six months.

Recommendation:

- Save Face should publish the personal identification numbers (PINs) of registrants from their respective statutory regulators and provide links or general information within profile entries on how to check these regulators.

Accreditation Panel findings

- 2.1 Save Face's register is presented as a user-friendly clinic search tool, catering to individuals seeking specific treatments within a chosen area. Users can perform searches based on Treatment, Location, Practitioner, or Clinic. Accordingly, it functions as a means to search for individual practitioners, ensuring that users can verify the credentials of each registrant working at the clinics.
- 2.2 Individual entries provide information about treatments performed, Registrants' regulatory body and prescriber status, examples of treatment results, and customer reviews. Disciplinary outcomes issued by Save Face or registrants' regulatory bodies will also be shown on individual profiles. Save Face has recently issued its Publication Policy highlighting how disciplinary outcomes will be presented, and also provides information about why a practitioner might not have been found on its register.
- 2.3 We require registers to provide registrants' full names, unique IDs, details of qualification required for registration, and a link to their own website where available. Register entries do not display personal identification numbers issued by Save Face or the registrant's regulatory body. The Accreditation Panel considered that providing the regulators' number, or links to the relevant register's entry, could provide assurance for those accessing Save Face's register, so issued the following Recommendation:
 - Save Face should publish the personal identification numbers (PINs) of registrants from their respective statutory regulators and provide

links or general information within profile entries on how to check these regulators.

- 2.4 Registrants' review sections relay positive experiences by clients. We had, in previous assessments, considered concerns that Save Face did not publish negative reviews which may not present an accurate reflection of their registrant, even if its standards for registration have not been explicitly breached. Save Face advised that negatives reviews were considered through its informal or formal complaints processes, as appropriate. Within this assessment, the Panel considered that while the CAP Code¹⁹ does not explicitly mandate the publication of negative testimonials, the ASA's overall emphasis is on not misleading consumers. By only publishing positive testimonials, Save Face might create an unbalanced view of consumer satisfaction, potentially misleading consumers. The ASA has upheld complaints where selective publication of testimonials has been deemed misleading. The Accreditation Panel issued the following Condition:
- Save Face is to ensure that its communications are not misleading by presenting a balanced view of consumer feedback, whether by allowing negative reviews on its register entries, or by communicating how these have been addressed by other means. This is to be implemented within six months.
- 2.5 Save Face has provided evidence of how it aims to address this Condition. This will be reviewed in due course.
- 2.6 Save Face's registration and accreditation process aims to ensure both practitioners and premises meet established standards through continuous improvement. Applicants undergo a two-stage process: an initial online submission of qualifications, training, and clinical protocols, followed by an on-site assessment conducted by non-aesthetic Registered Nurses. This includes a premises inspection and practitioner interview to evaluate compliance and consumer experience. Save Face supports applicants with template documents and requires ongoing self-assessments and customer satisfaction surveys. Save Face now has a published appeals process for adverse accreditation decisions.
- 2.7 Our Standards require registers to have clear policies for restoring individuals removed from the register following disciplinary actions. During our assessment, it was unclear how any applications would be considered by Save Face. However, Save Face has since provided updated procedures outlining their requirements and clarifying that their complaints panel will consider applications for restoration.

¹⁹ <https://www.asa.org.uk/advice-online/testimonials-and-endorsements.html>

- 2.8 Save Face's Standards for Accreditation require its registrants to provide evidence of 15 hours of CPD learning hours undertaken per year. Save Face will check CPD logs provided during annual renewal of accreditation.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met.

Accreditation Panel findings

- 3.1 Save Face sets comprehensive standards for competence, professional and ethical behaviour, and business practices, ensuring registrants adhere to rigorous requirements. These standards are detailed in the Save Face Standards for Accreditation, which include the necessity for written agreements outlining the terms and conditions of registration, adherence to defined practices, and holding current registration with a statutory body. Registrants must comply with safeguarding responsibilities, maintain confidentiality and data protection per GDPR and the Human Rights Act, and have written policies for managing complaints and utilizing an Alternative Dispute Resolution Scheme. They are required to provide certificates of medical malpractice and public liability insurance, comply with advertising standards, and follow an ethical framework that includes honesty, integrity, respect, and the Duty of Candour.
- 3.2 Our Standards require Accredited Registers and their registrants to have processes for handling safeguarding concerns and to provide guidance on these issues. Save Face registrants, through their statutory registration, should have the necessary training to identify various forms of abuse, including physical, psychological, sexual, financial, material, discriminatory abuse, or neglect, and know how to respond appropriately. Save Face's own Safeguarding Policy provides guidance on recognising various forms of abuse and outlines appropriate responses. It aims to ensure that registrants understand their responsibilities in protecting vulnerable adults, in compliance with statutory reporting requirements.
- 3.3 Save Face's Standards for Accreditation state that clinicians and clinics must have written policies and procedures for investigating and managing complaints about any part of their service, treatment, or facility. These policies must outline how to make a complaint, who is responsible for investigating it, and the timeframes for responding. Additionally, clinicians and clinics must comply with The Consumer Protection Act 2015 and signpost unresolved complaints related to customer service to an appropriate licensed Alternative Dispute Resolution Scheme.
- 3.4 Although Save Face's requirements for internal complaints procedures are comprehensive and subject to spot checks, at the time of our assessment Save

Face did not appear to require registrants to escalate concerns to Save Face, or the statutory regulators, if warranted. Save Face have since amended their standards to include that “Clinicians/ Clinics should report any concerns regarding unethical or illegal practice to Save Face. Clinicians/ Clinics should also direct members of the public to Save Face and/or statutory regulators where necessary.”

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued the following Condition and Recommendation:

Condition:

- Save Face should publish its Essential Curriculum to demonstrate how it assures the aesthetic competencies of its registrants. This is to be implemented within six months.

Recommendation:

- Save Face should ensure that its competency requirements, and further assurances such as its Essential Curriculum and assured qualifications, include competence in caring for a diverse population.

Accreditation Panel findings

- 4.1 Save Face sets a baseline standard for aesthetic competence by requiring registrants to be registered with an appropriate statutory healthcare regulatory body. This assures general medical competence but does not demonstrate specific training in non-surgical cosmetic procedures.
- 4.2 To address this, Save Face's Standards for Accreditation require that registrants provide evidence of treatment-specific training for all procedures they offer.
- 4.3 Save Face provides clear information on its website and within its Standards for Accreditation. The public can easily access the type and level of qualifications required for registration, including mandatory treatment-specific training, ongoing CPD, and basic life support certification.
- 4.4 Save Face had however recognised there were variations in training quality, and so developed its “Essential Curriculum” as a self-assessment tool for registrants. They also promote qualifications independently assured by the Royal Society for Public Health (RSPH) to further strengthen competency.
- 4.5 At the time of assessment, the curriculum was not readily accessible. The Accreditation Panel deemed it essential for Save Face to clearly outline the qualifications and experience required of registrants to demonstrate their competence, distinguishing them from non-registered peers. To address this, the following Condition was issued:

- Save Face should publish its Essential Curriculum to demonstrate how it assures the aesthetic competencies of its registrants. This is to be implemented within six months.
- 4.6 Save Face advised us of plans to build a section of its website explaining the Essential Curriculum. This will be assessed in due course.
- 4.7 Our Standards require that registrants should be equipped through their training to care for a diverse population. Save Face assures general competence in this area through registrants' statutory regulation. We considered that there were issues relating to non-surgical cosmetic procedures that may not be covered in core professional training. This included risk of discrimination affecting people of colour where lighter coloured skin is viewed as more desirable. The Accreditation Panel issued the following Recommendation accordingly:
- Save Face should ensure that its competency requirements, and further assurances such as its Essential Curriculum and assured qualifications, include competence in caring for a diverse population.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Conditions and Recommendation:

Conditions:

- Save Face is to develop its processes to assure that parties to complaints are appropriately supported throughout the complaints process. This is to be implemented within six months.
- Save Face is to develop mechanisms such as Indicative Sanctions guidance to assure that outcomes are consistent. This is to be implemented within six months.

Recommendation:

- Save Face should join the Information Sharing Protocol to demonstrate its commitment to communicating and acting on complaints outcomes by Accredited Registers.

Accreditation Panel findings

- 5.1 Save Face's complaints process offers multiple avenues for resolving concerns, escalating based on the seriousness of the issue. Complaints can be addressed through the registrant's own procedures for minor issues, informally through Save Face, via Panels managed by Save Face for more significant concerns, or in cooperation with the registrant's statutory regulator, reflecting any disciplinary outcomes for the most serious cases.
- 5.2 All concerns about registrants are managed according to an initial risk assessment. Lower and medium-risk concerns are handled by Save Face, while high-risk concerns are escalated to the registrant's statutory regulator,

along with all relevant evidence. Complaints may also be escalated if certain thresholds outlined in Save Face's policy are met, including instances where the registrant does not cooperate with Save Face's investigation.

- 5.3 Save Face's process allows for interim suspension of registration where necessary to protect the public during complaints investigations, and for appeals of its decisions. Complaints outcomes are monitored by Save Face's Advisory Board.
- 5.4 Accredited Registers must notify each other of disciplinary outcomes where appropriate. During our assessment we noted that Save Face had protocols for notifying statutory regulators but not for Accredited Registers. Save Face has since published its "Complaints Investigations Decisions" web page²⁰ which states it will advise other Accredited Registers when a practitioner is removed and has also joined the Accredited Registers Information Sharing Protocol.
- 5.5 Accredited Registers should publish complaints outcomes in line with their publications policies, so that members of the public can make informed decisions about who they see. Although Save Face made clear that it would reflect the outcomes of statutory regulators, it was not clear from Save Face's policies how disciplinary outcomes from its own processes, including interim suspensions, or medium level concerns, would be communicated. Save Face has since published its Publications Policy to address this.
- 5.6 Accredited Registers must ensure their processes are accessible and clear to all parties, with appropriate support offered when needed. Save Face's complaints policy states it will aim to support complainants throughout, however we considered that more information could be provided to support those raising concerns and to assist them throughout the complaints process. The Accreditation Panel issued the following Condition to address this:
 - Save Face is to develop its processes to assure that parties to complaints are appropriately supported throughout the complaints process. This is to be implemented within six months.
- 5.7 We were not sure if Save Face employed 'Indicative Sanctions' guidance to assist its Registrar and Clinical Director when issuing Medium-risk complaint warnings, or High-risk Complaints Panels for matters that do not reflect statutory-regulators' outcomes. The Accreditation Panel issued the following Condition to address this:
 - Save Face is to develop mechanisms such as Indicative Sanctions guidance to assure that outcomes are consistent. This is to be implemented within six months.
- 5.8 Save Face has since provided an updated "Internal Complaints Policy," which highlights possible or indicative sanctions for low, medium, or high-risk

²⁰ <https://www.saveface.co.uk/en/page/publications-policy>

complaints. This updated policy will be assessed against the Condition in due course.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met. It issued the following Conditions and Recommendation:

Conditions:

- Save Face must develop and publish its process for anyone to raise a concern or complaint about the Accredited Register. This is to be implemented within six months.
- Save Face must develop a documented approach to risk management, for example development of an organisational risk register that is periodically updated and considered by its Directors/Board. This is to be implemented within six months.

Recommendation:

- Save Face should consider further ways to promote transparency, for example by published board minutes or excerpts relating to the Accredited Register and its public protection aims.

Accreditation Panel findings

- 6.1 Save Face is owned and operated by its Chief Executive, Registrar (both registered Directors) and Clinical Director. They are supported by an appointed Expert Advisory Board that provides clinical expertise and patient perspectives.
- 6.2 Save Face's Governance Policy outlines its operating principles, including transparency, impartiality, consistency, objectivity, and accountability. The policy emphasises adherence to professional standards, risk management processes, and independent oversight through its advisory board. Guidelines are in place to manage potential conflicts of interest, to ensure it maintains a focus on its core objectives.
- 6.3 We noted that Save Face's website provided information about its governance but considered that it should consider how it can further promote transparency and public confidence by, for example, publishing meeting minutes or excerpts in the public interest. Save Face indicated its commitment to publishing summaries of matters in the public interest, which it presently shares with registrants, its wider mailing list, and on social media platforms. However, to meet the minimum requirements for transparency and public confidence, particularly for a privately owned Accredited Register, the Accreditation Panel considered that Save Face could publish further key (non-confidential) governance documents, such as board papers, minutes, and registers of interests related to the Accredited Register. Therefore, the Accreditation Panel issued the following Condition:

- Save Face is to consider further ways to promote transparency, for example by published board minutes or excerpts relating to the Accredited Register and its public protection aims. This is to be implemented within six months.
- 6.4 Within our assessment we did not see evidence of Save Face’s documented approach to organisational risk management. The Accreditation Panel issued the following Condition to address this:
- Save Face must develop a documented approach to risk management, for example development of an organisational risk register that is periodically updated and considered by its Directors/Board. This is to be implemented within six months.
- 6.5 Save Face advised that development of the organisational risk register was underway.
- 6.6 Our Standards require Accredited Registers to have processes in place for anyone to raise a concern or complaint about the Accredited Register. Save Face’s “Raise a Concern” page, we did not see information about how it will act on these. The Accreditation Panel issued the following Condition:
- Save Face should develop and publish its process for setting how it will address concerns or complaints about the Accredited Register. This is to be implemented within six months.
- 6.7 Save Face has since added further information about how it will manage complaints received including routes of escalation and intended timeframes.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met.

Accreditation Panel findings

- 7.1 Save Face maintains a practitioner risk register, demonstrating an awareness of potential risks associated with practitioners. This register undergoes regular review and mitigates risks through practices outlined in their Standards for Accreditation, complaints reporting mechanisms, and other processes.
- 7.2 During our assessment, we identified risks and mitigating actions relevant to non-surgical cosmetic practice that were not included on Save Face’s practitioner risk register. These were:
- Boundary violations and exploitation of service users
 - Body Dysmorphic Disorder and other relevant conditions
 - Safeguarding
- 7.3 Save Face have advised us that these risks and mitigating actions have since been add to its risk register.

- 7.4 Save Face's accreditation standards set out its requirements regarding maintaining professional boundaries, safeguarding responsibilities and considering the psychological needs of clients when obtaining informed consent.
- 7.5 We noted that Save Face's website and other materials provide clear and accessible information about the limitations and benefits of treatments offered by its registrants.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met.

Accreditation Panel findings

- 8.1 Save Face maintains a variety of communication channels through its website, social media, and media campaigns. We considered that its website appeared clear and accessible, providing direct access to essential information such as the register, complaints procedures, and descriptions of treatments.
- 8.2 The content published on Save Face's website and social media aligned with the aims of its register, and the Accredited Registers programme.
- 8.3 Save Face is a member of the Accredited Registers collaborative and engages with stakeholders such as the health professions statutory regulators. It has developed Memoranda of Understanding regarding handling of complaints where there is shared registration between registers.
- 8.4 Save Face provides clear explanations about the accreditation process and guides registrants in communicating this effectively. They ensure the Accredited Registers Quality Mark is used correctly by registrants within the UK. Key processes, including those concerning complaints, registration, standards, and publications are outlined transparently on the website.
- 8.5 Save Face demonstrates a commitment to seeking and incorporating feedback from service users and relevant stakeholders. This dedication is reflected in patient reviews and the requirements for registrants to actively gather feedback.

Share your experience

- 9.1 We received one response to our invitation to share experience of Save Face, relating to its communications. We checked this during our assessment of Standards 1 and 8.

Impact assessment (including Equalities impact)

- 10.1 We carried out an impact assessment as part of our decision to accredit Save Face. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

10.2 We acknowledged Save Face’s organisational commitment to inclusivity and diversity.

10.3 We noted that renewal of accreditation could have a positive effect on treatments of service users and an overall improvement of standards provided throughout the aesthetics industry in the UK.