

## East Dunbartonshire Council submission

Dear Health, Social Care and Sport Committee,

We are emailing in response to your request for views on a new licensing scheme for some aesthetic and beauty practitioners under The Civic Government (Scotland) Act 1982 (Licensing of Non-surgical Procedures) Order 2026.

Firstly, Environmental Health welcome the introduction of the new Order and see this as a necessary and positive step in future public protection from harms resulting from non-surgical procedures undertaken without suitable controls and due diligence.

We do however wish to present views on several matters related to the impact primarily on Environmental Health as well as what we see as other related considerations although due to the short timescale for response which included Christmas leave for many, the views of other departments have not been received. Points to raise include:

- Considerable additional resource burden on an already stretched service. The licencing scheme for this will likely (and naturally) fall to Environmental Health whose officers already have extensive remit including Skin Piercing and Tattoo licencing checks, health and safety enforcement, food safety, air quality, public health nuisances, and contaminated land for example. In recent years it has become evident including data from Food Standards Scotland audits and time recording exercises, that there is insufficient Environmental Health resource to deliver current functions let alone an expanded remit.
- It has not been possible to quantify at this stage the number of salons, operators and treatments that are currently being offered however we estimate that this will be the first stage in additional resource impacts and this as well as work beyond that must be considered under Local Government Finance additional financial burdens policies.
- We do not foresee this having an impact solely on Environmental Health as functions such as Legal Services and Licensing will also see likely increase in workload.
- The premises that will require a licence under this scheme could well be vast, as the procedures listed for this licencing scheme will likely cover many beauty salons as well as hairdressers and beauticians who operate from a domestic property.
- Dubiety on peripatetic workers / mobile salons who do not operate from a permanent premises that can include mobile salons who will rent chairs or rooms in salons or will visit the domestics premises of their clients. Will they require a licence for each premises they operate from, which could be a burden for a business.
- It will be crucial in the lead-in time to the implementation date that a national publicity campaign is undertaken to raise awareness of the licence scheme amongst industry and the public.

- For the licence scheme to be robust, it is essential that training is provided to local authority officers due to a lack of experience and knowledge of industry practices.
- To assist with implementation of the licence scheme, resources such as an Implementation Guide should be available similar to that provided for The Civic Government (Scotland) Act 1982 (Licensing of Skin Piercing and Tattooing) Order 2006. Compliance with a guide can be the core of meeting conditions of the licence and serves as a single point of reference for local authorities.
- As this industry has had limited dealings/interventions from local authority so far, training/assistance should be offered to those who will fall under this scheme.
- As unlicensed premises would fall to the Police to enforce – Police awareness regarding the change to the legislation should be undertaken. The Police would also see additional work in the likelihood of being consulted on applications.
- Local authority officers would like to have guidance on the level of training or competence required from operators.
- To ensure that all treatments that carry a risk of harm fall under a licence scheme it would be worthwhile comparing the list of treatments on Page 3 in the Skin & Tattooing Licensing Implementation Guide “PROCEDURES COVERED/NOT COVERED BY THE ORDER” as some of these procedures are now covered by the introduction of the new licencing scheme however, some are not covered such as implants/ cupping/ stapling/ cutting.
- It would be prudent to confirm that a premises that is licenced under HIS but offers a treatment detailed in this Order would not require an additional licence from the local authority as well?
- With the beauty industry being fast-paced and new treatments arising, in order to future proof the licence scheme consideration should be given to possible future treatments which may fall out with this scheme.
- A local or national licence register made publicly available should be considered to assist the public and regulators.

We hope this is of assistance when considering this Order. We are content for this submission to be published as an East Dunbartonshire Council response.

Kind Regards,

East Dunbartonshire Council Environmental Health Team