

The Civic Government (Scotland) Act 1982 (Licensing of Non-surgical Procedures) Order 2026 (the order)

Non-surgical Procedures and Functions of Medical Reviewers (Scotland) Bill (the bill)

Views of East Renfrewshire Council Environmental Health Department (ERC EH).

The risks associated with non-clinically trained practitioners administering high risk aesthetics procedures such as Botox injections and fillers are significant. ERC EH is supportive of the Bill and the requirement for clinical oversight of these high-risk procedures.

ERC EH is a small urban department and has a resource pool of 3.6 full time equivalent officers tasked with food law enforcement, health and safety law enforcement and licencing activity. We are already significantly under resourced in terms of fulfilling our current statutory obligations.

It is our view that additional authorised officer(s) would be required to implement and maintain the new licensing scheme. It is difficult to calculate the precise resource requirements but there are a large number of beauty and aesthetics premises within East Renfrewshire that currently undertake procedures in the scope of the order, and we anticipate that the resource demand of the licensing scheme will be significant, particularly in the initial phase. This will impact our Environmental Health, Civic Government Enforcement and Licensing Sections and the services that these sections already provide.

We would ask what the proposal for the provision of funding for additional authorised officers and training for officers specific to the Schedule 1 procedures would be?

A highly visible information campaign will be critical to the success of the licensing scheme, both to guide the public on where and how to safely access licensed and clinical procedures and to guide businesses on compliance. ERC EH would support a national information campaign involving The Scottish Government, Health Improvement Scotland and Scottish Local Authorities to provide clear and consistent advice and instruction to the public and the beauty sector alike.

ERC EH is generally comfortable with the procedures specified in Schedule 1, we believe that these are broadly comparative in risk to those included in the Skin Piercing and Tattooing licensing regime.

There is a risk that novel procedures will emerge and escape the definitions provided, ERC EH would encourage regular review of the definitions to ensure that novel procedures are appropriately categorised.

ERC EH would note that the licence conditions laid down in the order do not reference the knowledge, training or competence of applicants or operators under their control. We would support a national consensus on the requirement for training of operators for the safe undertaking of the procedures specified in Schedule 1.

We are aware of a disturbing tendency for consumers to seek aesthetics treatments based on factors such as cost or social media advertising. We hope that the Order and Bill will provide clarity on where customers can access these treatments safely. However, botulinum toxin and hyaluronic acid fillers and other injectables remain available to purchase online. Shutting down

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the online sale of these products to non-clinicians will be critical in controlling rogue traders seeking to operate out with the licensing scheme and the BSP Bill provisions.

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