



Finance and Corporate Resources
Executive Director **Jackie Taylor**
Administration and Legal Services
Head of Administration and Legal Services **Iain Strachan**

Health, Social Care and Sport Committee
(by email only)

Our ref: IS
Your ref:

Date: 9 January 2026

Dear Sirs

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

We are responding to the call for views in respect of the above draft Order (**the Order**).

The Council has considered the potential impact of the Order, should it become law, as related to the [Non-surgical Procedures and Functions of Medical Reviewers \(Scotland\) Bill](#).

The Council already operates a licensing regime in respect of similar services, namely tattoo and piercing services, and from that perspective could extend its existing arrangements to those that would be covered under the new regulations, should they become law.

The Council, would, however offer the following comments, albeit that at this stage it is not known how many businesses within South Lanarkshire could be within scope of the Order. As such, these comments are qualified on that basis, as the impact of the Order, on both the Council and local businesses cannot be fully known.

Firstly, given the nature of the services potentially in scope, there would be a need for a suitable public awareness raising campaign and stakeholder engagement by the Scottish Government and other relevant agencies, perhaps Public Health Scotland. This is needed both for operators, but also the public, so they are suitably informed for the reasons behind these changes, and any impact this might have on the availability of services, and costs.

Secondly, the Council will need to assess whether it requires additional resources to effectively meet its duties, and if these can be accommodated by the additional income that could be associated with the extension of the current civic licensing framework to these services. This is both in respect of the actual licensing process, i.e. applications and assessment, but also around compliance and enforcement. As this stage, this cannot be accurately quantified, but there may be a negative impact on existing service delivery with this extension and in the absence of additional funding being provided to local authorities by the Scottish Government to undertake these duties, other than what may be funded directly from additional fee income.

There will, of course, be a need for additional training of staff, and in due course local awareness



raising by the Council, should the Order become law.

Thirdly, there will be a need for suitable guidance being produced for licensing authorities and service providers by the Scottish Government, on a timely basis, to ensure readiness for the new regime coming into force.

The Scottish Government may also wish to consider the creation of a Short Life Working Group, including representatives from local government, Scottish Government, Public Health Scotland, SOLAR and service providers, to help support the introduction of this regime, and drafting of the guidance.

The Council hopes this is helpful.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Iain Strachan', with a long horizontal flourish extending to the right.

Iain Strachan
Head of Administration and Legal Services