

1

**From:** [REDACTED] (NHS HEALTHCARE IMPROVEMENT SCOTLAND) <[REDACTED]@nhs.net>  
**Sent:** 15 February 2018 14:08  
**To:** [REDACTED]@eduqual.org.uk>  
**Subject:** Re: FAO [REDACTED]

Dear [REDACTED]

[REDACTED] has asked me to respond to your email. We are very pleased that you are seeking accreditation for a qualification in injectables. As you are aware there is currently no recognised qualification and therefore from our point of view there is no benchmark. We regulate Independent clinics provided by nurse, doctors, dentists and dental practitioners who have attended a range and standard of courses from a couple of hours upwards. A recognised competency level can only improve the safety and the quality of these services. Our legislation, The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011 <http://www.legislation.gov.uk/ssi/2011/182/regulation/12/made> makes requirement in relation to employees working within an independent healthcare service – the provider must ensure that at all times suitably qualified and competent persons are working in the independent health care service in such numbers as are appropriate for the health, welfare and safety of service users; while we ask for evidence of qualifications and relevant training we are unable to judge the difference in quality of education. We measure outcomes for patients through the service feedback mechanisms and also in complaints activity and notification re incidents and errors.

The new Health and Social Care Standards are currently being implemented and are focused on improving outcomes for patients, I have attached a copy for your information.

The first inspections of independent clinics are just about to start and we will be looking at the safe delivery of services and this includes the skills of the clinician, we will have a clearer idea of how these services are performing and where the areas for improvement including the skills of the clinicians.

It would be good if you could keep in touch regarding progress, a course outline would be very helpful once accredited.

Regards

[REDACTED]

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2

**From:** [REDACTED]  
**Sent:** 28 February 2022 10:55  
**To:** [REDACTED]@gov.scot; [REDACTED]@sqa.org.uk>  
**Subject:** RE: Non-surgical cosmetic procedures accredited training

Hi [REDACTED]

We are both well, thanks.

We have only accredited the following microneedling and laser qualifications for Eduqual, but at this moment in time they do not have any approved centres and therefore these qualifications are not currently being offered in Scotland. The pandemic has obviously impacted on the take up of these qualifications, but we have accredited them until August 2025 and Eduqual are hopeful of take-up.



4

**From:** ██████████@sqa.org.uk>  
**Sent:** 29 November 2023 12:09  
**To:** ██████████@sqa.org.uk>  
**Subject:** FW: Non-surgical cosmetic procedures accredited training

FYI

5

**From:** ██████████@gov.scot  
**Sent:** Monday, February 28, 2022 11:56 AM  
**To:** ██████████  
**Subject:** RE: Non-surgical cosmetic procedures accredited training

Many thanks for your quick response ██████.

How much of this information can I share with the public who have asked about training in Scotland? For example, can I tell them of the 3 Eduqual accredited courses but say that they are currently not offered in Scotland? Can they influence Eduqual to provide these courses in Scotland?

Should / Can I direct people to anyone for advice about training?

Sorry about the questions – just want to provide as much of a response as possible.

Kind regards,

██████  
████████████████████ | Safety, Openness and Learning Team | Healthcare Quality and  
Improvement Directorate | The Scottish Government

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6

**From:** ██████████  
**Sent:** 07 August 2018 10:50  
**To:** ██████████@jccp.org.uk>  
**Cc:** ██████████@sqa.org.uk>  
**Subject:** FW: Cosmetics Interventions Group

Good morning ██████

Further to our telephone call, ██████ has confirmed that she would be happy for JCCP to undertake a little more investigation around the advert and offer a perspective on how to handle such scenarios. An opportunity for JCCP to highlight any concerns around such practice in general.

I've attached a copy of the screenshot for information. Original enquiry is part of the email chain.



St Andrew's House  
Regent Road, Edinburgh  
EH1 3DG

9

**From:** [REDACTED]@sqa.org.uk>

**Sent:** 06 August 2018 16:58

**To:** [REDACTED]@gov.scot>; [REDACTED]@sqa.org.uk>

**Cc:** [REDACTED]@gov.scot>; [REDACTED]@gov.scot>;

[REDACTED]@gov.scot>

**Subject:** RE: Cosmetics Interventions Group

Good afternoon [REDACTED]

Many thanks for forwarding the information and screenshot. (Not sure if a single screenshot was the intention as the information/letter references others?)

In respect of your query regarding best practice and governance, first thing to say is that the advert by the Aesthetic Beauty Academy UK seems to be a good example of what we are led to believe, by our colleagues at the Joint Council of Cosmetic Practitioners (JCCP), occurs across much of the rest of the UK. In effect the discounting and packaging of (non-regulated) training courses, as well as practice, in the hope of generating business.

We undertook a little bit of research into this particular business which is based in Rotherham and with that in mind, the use of levels and the formatting of 'training' titles within the advert makes sense. In essence, it is a format that *could* be intended to lead stakeholders to believe that the provision is recognised by Ofqual and sits within the Regulated Qualifications Framework (RQF). It is also interesting to note that the Clinical and Training Director of the business concerned indicates that she holds qualifications in the areas identified in the advert but without reference to levels or specific awarding bodies:

<https://aestheticbeautyuk.co.uk/about-us/>

Certainly, as stated in the letter within your email, the assertion that there are no regulated Level 7 qualifications as described by the advert available within the UK is almost certainly correct. You will be aware, Industry Qualifications (IQ) Awarding Organisation does have the following qualification, *IQ Level 7 Certificate in Injectables for Aesthetic Medicine*, recognised by Ofqual but I would be surprised if this is what the advert is alluding to here.

I assume the advertisement to be in a trade magazine available across the UK and as such could impact upon Scottish learners/businesses. Particularly as the Clinical and Training Director is available to support other training centres as a teacher/assessor/IQA on a freelance basis. There is certainly nothing to stop them being available in Scotland but it is difficult to say if this is currently the case because they appear to be non-regulated.

We can, with your permission, speak to [REDACTED] at the JCCP to see if they are aware of this business and of any delivery in Scotland if you feel this would be useful. (I believe you already have a scheduled meeting with [REDACTED] on 19 September?)

All things considered, we would not consider this to be an acceptable advert as in a number of ways it is misleading. Certainly, if this provision was regulated by SQA Accreditation we would be engaging

with the awarding body concerned to seek an understanding of how the centre is being managed and why it has been allowed to package provision in this way, to ensure that delivery was not comprised by such a process and remained fit for purpose, as well as insisting and that the qualifications are promoted correctly to stakeholders.

I hope this reply helps in some way and if you require any further feedback please don't hesitate to contact me.

Kind regards

██████████

10

**From:** ██████████@gov.scot <██████████@gov.scot>

**Sent:** 06 August 2018 11:31

**To:** ██████████@sqa.org.uk; ██████████@sqa.org.uk

**Cc:** ██████████@gov.scot; ██████████@gov.scot; ██████████@gov.scot

**Subject:** FW: Cosmetics Interventions Group

Dear ██████████ and ██████████

I look forward to meeting you ██████████, at the next cosmetics intervention meeting. In the meantime we have been sent screen shot of advertisements for training courses (attached). We are not sure of the status of these in Scotland and would value your views as to whether the way they are worded is consistent with best practice and good governance ? Best wishes, ██████████

██████████

██

Planning and Quality  
Directorate of Healthcare Quality & Improvement  
Health & Social Care  
The Scottish Government  
Room GE06  
St Andrew's House  
Regent Road, Edinburgh  
EH1 3DG

11

**From:** ██████████@doctors.org.uk

**Sent:** 04 August 2018 11:10

**To:** ██████████@gov.scot

**Cc:** ██████████@ggc.scot.nhs.uk; ██████████@gov.scot;

██████████@ayrshire.ac.uk; ██████████@gov.scot;

██████████@glasgow.gov.uk; ██████████@gov.scot;

██████████@dermalclinic.co.uk; ██████████@nhs.net; ██████████@babtac.com;

██████████@aberdeenshire.gov.uk; ██████████@francesturnertraill.co.uk; ██████████@ftt.scot;

██████████@gov.scot; ██████████@templemedical.co.uk

**Subject:** Re: Cosmetics Interventions Group

Hello All,

Hope you are well.

I wanted to bring to the attention of all involved in Phase II the attached letter from Jane Freeman who is (as far as I am told) Cabinet Secretary for Health and Sport.

██████████, one of the owners of the Face&Body Clinic in Edinburgh has been speaking with his MSP, advising him of the rise in non medics injecting, the harm many of them are causing, and the letter attached is the reply his MSP received.

I've read the letter twice and am still confused. The sentence that confuses me the most is "Through these meetings, should non-medically qualified individuals wish to undertake such work, a suitable course of study will be available to them, to enable them to do so".

Granted, I've missed a couple of meetings, but when was the above decided? Has this actually been decided by 'the powers that be'? In which case has the Phase II board merely been a futile exercise? This is in complete contradiction to what was discussed at the last meeting. There are other statements in the letter which are bold and seem to be plucked out of thin air.

I'd like to draw everyone's attention to the first image attached. A non medic has found a new way to make more money out of a pre-packed syringe intended for single person use. Use a small amount of the syringe for many people! Is she injecting everyone from the same syringe? Is she decanting it each time? Who knows? Does it matter? After all, she's allowed to do what she wants.

There was recently a picture on facebook that a non medic put up of her 'patients' post facial needling and PRP (where a patient's blood is taken, centrifuged and then re-injected into the face). The girls were covered in their own blood, hugging, their foreheads touching. This case was in England.

I know we need evidence to support our educated opinion backed by our experience, years of medical training and common sense. The calibre, morals and ethos of what we see on social media by many non medics is infuriating and dangerous. There is also an image attached of non medics teaching claiming to be offering "level 7" teaching. These people are out for financial gain. What they are doing is criminal and putting the public at risk. If we let them proceed, we are equally responsible for the resulting harm.

Attached is an image from 'NK aesthetics' detailing her/his qualifications. Not only are they a complete and utter farse but also lies. There is no level 7 course she/he could have completed in injectables since. She/he might believe they are level 7 qualified because of the lies from courses in the previous image.

I hope everyone on the board who is not on the front line is starting to get an impression of what non medics in Aesthetics are like. These are only a small handful of cases. I will happily send you another 50 (with no exaggeration). I hope the board is getting a sense of where their interests lay (financial gain) and perhaps most importantly, the limitations of their education, training and moral compass.

Sincerely,

██████████

**12**

On 2018-08-02 11:37, ██████████@gov.scot wrote:

Dear All,

The next Cosmetics Interventions Group meeting will be on **Tuesday 23<sup>rd</sup> October** from **10.30am to 1pm** at **St Andrew's House in Edinburgh**.

I would be grateful if you could hold this date and time in your calendar and, if possible, confirm if you will be able to attend and whether this will be in person or via teleconference.

Please find attached the notes from the last meeting on 8 May. Further details, including the agenda, will follow separately and closer to the date of the meeting.

Kind regards,

██████████

████████████████████

████████████████████

**Person-centred and Quality Team**

**Scottish Government**

St Andrew's House

Regent Road

Edinburgh EH1 3DG

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**13**

**From:** ██████████@sqa.org.uk>

**Sent:** 20 June 2018 10:30

**To:** George Brown <George.Brown@sqa.org.uk>; John Byrne <John.Byrne@sqa.org.uk>; ██████████

████████████████████@sqa.org.uk>

**Subject:** RE: SCIEG phase 2

Thanks George.

As ██████████ has been in contact with both JCCP and HIS (Healthcare Improvement Scotland) it would be helpful if he was also involved (hope that's ok with you ██████████)

Just a bit more background/info –

- There is currently a QCF/RQF Level 7 qualification accredited by Ofqual – IQ are currently approved to offer (it has been available for a while)
- The Eduqual Diploma in Clinical Aesthetic Injectable Therapies is based on the new JCCP/CPA standards (Joint Council for Cosmetic Practitioners & Cosmetic Practice Standards Authority).
- Eduqual are also working with the British Association of Cosmetic Nurses and the Royal College of Surgeons.
- The qualification consists of 7 mandatory units and Eduqual have sent me copies of the unit specifications which I have reviewed and provided feedback on. They are using a range of assessment methods/instruments and some units have very specific evidence requirements which align with the CPA standards (eg.X no. of observed treatments and X no. of supervised treatments).
- They have also provided completed credit rating forms which I have also reviewed and provided feedback on. I also sought a second opinion and asked Alistair to review these too.
- The qualification is likely to be at SCQF Level 11 and a minimum of 60 credits (Alistair and I both thought that the allocation of notional learning hours was a bit on the low side so have asked them to review. We were however satisfied that the SCQF level was appropriate and sufficiently justified).
- Eduqual are currently finalising the qualification (specifications & guidance) and preparing their submissions for accreditation and credit rating approval.

Cheers

██████████

████████████████████  
████████████████████

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14

**From:** George Brown <George.Brown@sqa.org.uk>

**Sent:** 03 July 2018 13:38

**To:** ██████████@gov.scot

**Cc:** ██████████@gov.scot; ██████████@gov.scot; ██████████@sqa.org.uk;

██████████@sqa.org.uk>

**Subject:** RE: SCIEG phase 2

██████████

As per our telephone conversation, EduQual has agreed to share its unit specifications with you so you can get an idea of the content. ██████████ has been supporting EduQual with their submission and would make a valuable member of your group to provide the technical expertise with regards to our function and what we can do to support you. I have also copied in ██████████ who has also been working with EduQual and he has made some contacts with the Joint Council for Cosmetic Practitioners (JCCP).

I have attached the unit specifications along with some background information from [REDACTED] which we hope is of assistance

Regards

George

**George Brown**  
Head of Accreditation  
SQA Accreditation

15

**From:** [REDACTED]@gov.scot  
**Sent:** 19 June 2018 16:12  
**To:** George Brown  
**Cc:** [REDACTED]@gov.scot; [REDACTED]@gov.scot  
**Subject:** RE: SCIEG phase 2

Hi George

Many thanks for your e-mail.

We are currently looking at injectables from a cosmetic / aesthetics point of view, particularly those related to lip or dermal fillers as provided by a non-medically qualified individual such as a beautician in an independent clinic not currently regulated by Healthcare Improvement Scotland.

Whilst not wishing to put people out of business, we consider it essential from patient safety perspective, that anyone looking to do so, be appropriately qualified and competent. There is talk down south of introducing a suitable qualification around their level 7 which I understand equates to a level 10 SVQ or thereabouts. Whilst this would be setting a high bar, we consider it appropriate.

Your e-mail is therefore timely and I wonder if it would be possible for my colleagues and I to have a chat with you sometime soon to discuss the mechanics and possible difficulties around introducing such a qualification.

I look forward to hearing from you.

Regards.

[REDACTED]

[REDACTED]

[REDACTED] | Healthcare Quality and Improvement Directorate | The Person Centred & Quality Team | Health and Social Care | The Scottish Government | GER, St Andrew's House, Edinburgh, EH1 3DG | [REDACTED]@gov.scot

16

**From:** George Brown <George.Brown@sqa.org.uk>

**Sent:** 19 June 2018 13:22

**To:** [REDACTED]@gov.scot; [REDACTED]@gov.scot>

**Subject:** SCIEG phase 2

[REDACTED]

I have been passed your email addresses by [REDACTED], who is a member of our Accreditation Committee.

By way of an introduction, I head SQA's Accreditation function. We have responsibility for the approval of awarding bodies and accrediting any qualifications submitted by them.

At this morning's Accreditation Committee I mentioned that we had approved one new awarding body, which specialises in qualifications aimed at the medical profession. I mentioned that it was currently in discussion with us with regards to the accreditation of a qualification which has a working title of "injectables". This is aimed at the medical profession however, [REDACTED] suggested that I should get in touch with you as there is a working group which is looking at this and it is likely that this area will be limited to some of the medical profession.

Grateful for any assistance

Regards

George

**George S Brown**  
Head of Accreditation  
SQA Accreditation

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17

**From:** [REDACTED]@gov.scot <[REDACTED]@gov.scot>

**Sent:** 23 March 2021 16:12

**To:** [REDACTED]@sqa.org.uk>

**Cc:** [REDACTED]@sqa.org.uk>

**Subject:** RE: SQA Accreditation

We had a call with David yesterday and he dropped us an email that VTCT had been approved.

Kind regards,

[REDACTED]

18

**From:** [REDACTED]

**Sent:** 23 March 2021 13:56

**To:** [REDACTED]

**Cc:** [REDACTED]  
**Subject:** RE: SQA Accreditation

Hi [REDACTED]

You're welcome.

By way of an update, I received a notification from [REDACTED] of the JCCP that the VTCT Level 7 qualification for injectables and derma fillers, reference in the briefing note, had now been 'approved'.

I believe he has already alerted [REDACTED] of this fact.

Kind regards

[REDACTED]

19

**From:** [REDACTED]@gov.scot  
**Sent:** 23 March 2021 13:50  
**To:** [REDACTED]  
**Subject:** RE: SQA Accreditation

Thanks [REDACTED].

I haven't had a chance to read the papers yet but just wanted to say thanks before I forget.

[REDACTED]

20

**From:** [REDACTED]@sqa.org.uk>  
**Sent:** 22 March 2021 17:37  
**To:** [REDACTED]@gov.scot>; [REDACTED]@gov.scot>; [REDACTED]  
[REDACTED]@gov.scot>  
**Cc:** [REDACTED]@sqa.org.uk>  
**Subject:** SQA Accreditation

Colleagues

As requested, a short summary paper of available provision and the potential role of SQA Accreditation.

Any further queries, please don't hesitate to contact myself or [REDACTED].

Kind regards

[REDACTED]

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21

**From:** [REDACTED]

**Sent:** 22 March 2021 17:37

**To:** [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@gov.scot

**Cc:** [REDACTED]@sqa.org.uk>

**Subject:** SQA Accreditation

Colleagues

As requested, a short summary paper of available provision and the potential role of SQA Accreditation.

Any further queries, please don't hesitate to contact myself or [REDACTED].

Kind regards

[REDACTED]