

1

From: [REDACTED]@sqa.org.uk>
Sent: 14 August 2018 11:47
To: [REDACTED]@sqa.org.uk>
Subject: Discussion & Update on Clinical Aesthetic Injectables

Hi [REDACTED]

Thought you might want to see the letters of support from JCCP & HIS re Eduqual submission. I thought the HIS one was pretty supportive and maybe we could look to engage with the person who provided the support ([REDACTED]) (not sure who you originally spoke with).

Do you want to try to set up a meeting for next week to update all (George, [REDACTED], [REDACTED], You & I) on the recent developments and discussions etc? I could make arrangements to come up next week (I could do Tuesday, Wednesday or Thursday). Just let me know and I will book my travel?

Cheers

[REDACTED]

2

From: [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]

Healthcare Improvement Scotland

Delta House | 50 West Nile Street | Glasgow | G1 2NP

3

From: [REDACTED]@jccp.org.uk>

Sent: 12 February 2018 10:54

To: [REDACTED]@eduqual.org.uk>

Subject: JCCP Support

[REDACTED]

I understand that EduQual is currently completing an SQA-Accreditation qualification accreditation form for a postgrad-level Injectables qualification. This is to confirm support from the Joint Council for Cosmetic Practitioners – the new self-regulatory body for non-surgical treatments in the UK. We are fully supportive of approved qualifications that meet the newly published standards framework endorsed by ourselves and the Cosmetic practice Standards Authority (CPSA). There is huge and growing demand in this sector for recognized and high quality qualifications.

[REDACTED]

4

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.

- Award in Micro Needling Skin Rejuvenation SCQF Level 7
- Award in Non-Ablative Laser and Light Based Skin Rejuvenation SCQF Level 7
- Award in Chemical Skin Rejuvenation SCQF Level 7

National Occupational Standards (NOS) were developed for these disciplines/modalities (including [botulinum toxin](#) and [dermal filler](#)) in 2021 although none of our awarding bodies have sought to develop qualifications and seek accreditation.

There are a number of Ofqual approved awarding bodies offering qualifications in these areas, but I am not aware if they are offering them in Scotland. For example, we are aware of the following awarding bodies offering in this area of practice – VTCT, OHTM, Gatehouse Awards and Qualifi (there are also some others which only offer microneedling and laser). Although these qualifications are regulated via Ofqual, if they are being offered in Scotland we are unable to monitor the qualification delivery, assessment and quality assurance and are therefore unable to ensure their fitness for purpose for Scotland.

JCCP have currently recognised the Eduqual qualifications listed above and also the awarding bodies VTCT and OHTM offering the RQF Level 7 Diploma in Clinical Aesthetic Injectable Treatments.

I hope this information is useful, but please don't hesitate to come back to me if you have further queries.

Kind regards

[REDACTED]

[REDACTED]

5

From: [REDACTED]@gov.scot

Sent: 25 February 2022 09:56

To: [REDACTED]

Subject: Non-surgical cosmetic procedures accredited training

Hi [REDACTED] and [REDACTED].

I hope this email finds you both well.

I have received a couple of emails asking about training, in Scotland, for non-surgical cosmetic procedures such as microneedling, laser treatments, botulinum toxin and dermal filler injections.

When we met last year, VTCT was the only awarding body through SQA although they had not yet sought accreditation in Scotland. Are you able to provide an update and any advice on how people would access training in this area?

Many thanks in advance.

[REDACTED] | Safety, Openness and Learning Team | Healthcare
Quality and Improvement Directorate | The Scottish Government

6

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

Sent: 29 November 2023 12:09

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

Subject: FW: Non-surgical cosmetic procedures accredited training

FYI

7

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

Many thanks for your quick response [REDACTED].

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,

[REDACTED] | Safety, Openness and Learning Team | Healthcare Quality and Improvement Directorate | The Scottish Government

8

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

- Award in Micro Needling Skin Rejuvenation SCQF Level 7
- Award in Non-Ablative Laser and Light Based Skin Rejuvenation SCQF Level 7
- Award in Chemical Skin Rejuvenation SCQF Level 7

National Occupational Standards (NOS) were developed for these disciplines/modalities (including botulinum toxin and dermal filler) in 2021 although none of our awarding bodies have sought to develop qualifications and seek accreditation.

There are a number of Ofqual approved awarding bodies offering qualifications in these areas, but I am not aware if they are offering them in Scotland. For example, we are aware of the following awarding bodies offering in this area of practice – VTCT, OHTM, Gatehouse Awards and Qualifi

(there are also some others which only offer microneedling and laser). Although these qualifications are regulated via Ofqual, if they are being offered in Scotland we are unable to monitor the qualification delivery, assessment and quality assurance and are therefore unable to ensure their fitness for purpose for Scotland.

JCCP have currently recognised the Eduqual qualifications listed above and also the awarding bodies VTCT and OHTM offering the RQF Level 7 Diploma in Clinical Aesthetic Injectable Treatments.

I hope this information is useful, but please don't hesitate to come back to me if you have further queries.

Kind regards

[REDACTED]

[REDACTED]

9

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

Sent: 25 February 2022 09:56

To: [REDACTED]@sqa.org.uk; [REDACTED]@sqa.org.uk

Subject: Non-surgical cosmetic procedures accredited training

Hi [REDACTED].

I hope this email finds you both well.

I have received a couple of emails asking about training, in Scotland, for non-surgical cosmetic procedures such as microneedling, laser treatments, botulinum toxin and dermal filler injections.

When we met last year, VTCT was the only awarding body through SQA although they had not yet sought accreditation in Scotland. Are you able to provide an update and any advice on how people would access training in this area?

Many thanks in advance.

[REDACTED]

[REDACTED] | Safety, Openness and Learning Team | Healthcare Quality and Improvement Directorate | The Scottish Government

10

From: [REDACTED]

Sent: 07 August 2018 10:50

To: [REDACTED]@jccp.org.uk

Cc: [REDACTED]@sqa.org.uk

Subject: FW: Cosmetics Interventions Group

Good morning [REDACTED]

Further to our telephone call, [REDACTED] 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.

Any queries, please don't hesitate to call.

Kind regards

[REDACTED]

11

From: [REDACTED]
Sent: 07 August 2018 10:17
To: [REDACTED]@gov.scot'; [REDACTED]
Cc: [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@gov.scot;
[REDACTED]@gov.scot; [REDACTED]@ggc.scot.nhs.uk
Subject: RE: Cosmetics Interventions Group

Good morning [REDACTED]

Happy to meet on 23 October as requested. I'll add to my diary and await details.

I'll also liaise with [REDACTED] at JCCP regarding the advert and organisation in question.

Kind regards

[REDACTED]

12

From: [REDACTED]@gov.scot <[REDACTED]@gov.scot>
Sent: 07 August 2018 09:42
To: [REDACTED]@sqa.org.uk>; [REDACTED]@sqa.org.uk>
Cc: [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@gov.scot;
[REDACTED]@gov.scot; [REDACTED]@ggc.scot.nhs.uk
Subject: RE: Cosmetics Interventions Group

Dear [REDACTED]

This is a very helpful reply. We would be delighted if you speak to [REDACTED] and follow-up on this business. We also wondered whether it is possible to meet with you and [REDACTED], plus the Chair of the cosmetic interventions regulation group, [REDACTED] (cc'd above) shortly before the next meeting (which is on the 23rd October). If that sounds possible, we will be in touch with dates, and aim to meet in Glasgow - where you and [REDACTED] work.

Best wishes, [REDACTED]

[REDACTED]
[REDACTED]
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

13

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>;

Bennett [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

15

From: [REDACTED]@doctors.org.uk>

Sent: 04 August 2018 11:10

To: [REDACTED]@gov.scot>

Cc: [REDACTED]@ggc.scot.nhs.uk; [REDACTED]@gov.scot>;

[REDACTED]@ayrshire.ac.uk;

[REDACTED]@glasgow.gov.uk;

[REDACTED]@gov.scot>;

[REDACTED]@dermalclinic.co.uk;

[REDACTED]@nhs.net;

[REDACTED]@babtac.com;

[REDACTED]@aberdeenshire.gov.uk;

[REDACTED]@ftt.scot;

[REDACTED]@gov.scot>;

[REDACTED]@templmedical.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.

[REDACTED], 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,

██████████

16

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

Dear All,

The next Cosmetics Interventions Group meeting will be on **Tuesday 23rd 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

17

From: ██████████

Sent: 12 March 2021 12:57

To: ██████████@sqa.org.uk>

Subject: FW: JCCP 10 point Plan

Hi [REDACTED]

Outline of JCCP's 10 Point Plan. Embargoed for another couple of weeks.

Nothing particularly surprising in it that I can see.

[REDACTED]

18

From: [REDACTED]
Sent: 12 March 2021 10:56
To: [REDACTED]
Subject: JCCP 10 point Plan

[REDACTED]

See attached. Embargoed until end of March 2021.

[REDACTED]

19

From: [REDACTED]
Sent: 15 August 2018 16:36
To: George Brown <George.Brown@sqa.org.uk>; [REDACTED]@sqa.org.uk;
[REDACTED]@sqa.org.uk; [REDACTED]@sqa.org.uk;
[REDACTED]@sqa.org.uk
Subject: JCCP tele-Kit 3 August 2018.

Colleagues

For information. **Tele-kit: SQA Accreditation and JCCP 3 August 2019**

Attendance: [REDACTED] (SQA Accreditation)
[REDACTED] (JCCP)

Purpose of the meeting was to provide an update on JCCP policy decisions ratified at a Board meeting on 31 July 2018.

1. A full set of entry requirements relating to education and training providers wishing to be recognised in the relevant register have been ratified.

The entry requirements were piloted using a number of colleges and training providers. Final version has been approved and will be publicly after 1 September 2018.

No requirement for Awarding Bodies to be on the register as JCCP intends to 'contract' with The relevant ABs via a Memorandum of Understanding.

2. New competency framework will be finished by 1st September. A reiteration of the fact that the ownership of the original HEE standards and framework (levels 4 to 7) was passed to

JCCP in June. The standards and framework were subject to industry consultation and revised to address perceived weaknesses clinical based competence.

3. With the above in mind, JCCP continues to talk to IQ with a view to encouraging the AB to refresh the RQF level 7 qualification that has been Ofqual recognised. (Until this morning, the only UK regulated provision.) JCCP believes the qualification fall short of the requirements to meet the revised Level 7 standard. IQ disagrees with the JCCP position and appears reluctant to do so outside Ofqual's timescale for review of the qualification which is apparently March 2019. In a bid reach agreement, JCCP suggested that the IQ qualification be subject to some form of independent review and has asked that SQA Accreditation take on this role.
4. The JCCP Board has taken the decision to suspend access to its Register for all non-healthcare practitioners who practise Level 7 injectable and/or dermal fillers procedures for a period of 3 years whilst a detailed evaluation can take place of the 'risks' involved to the general public and will use this period to resubmit the case for statutory regulation of the whole sector to the Department of Health and Social Care. (See attached press release.) The BBC articles identified by George reflects this position.
5. For information. JCCP will be meeting ██████████ of Scot Govt on 19 September. The intention will be to discuss intentions around the proposed changes to the Register of Practitioners. (See attached.)

██████████

20

From: ██████████@sqa.org.uk>

Sent: 15 October 2018 11:05

To: ██████████@sqa.org.uk>

Subject: JCCP

Hi ██████████

Spotted this on the front page of JCCP website – see below. There has obviously been a bit of backlash following their statement re non-healthcare practitioners.

██████████

'The JCCP has received a number of communications with regard to the status of non healthcare practitioners who wish to offer treatments involving the injection of Botulinum Toxins and dermal fillers.

The JCCP wishes to confirm that the Council is accredited to provide a non-statutory voluntary register with no requirement for practitioners to join. As such the JCCP is not authorised to impose any restriction on the legal practice of any Aesthetic Practitioner, irrespective of their background. As such the JCCP has never sought to prevent any practitioner from delivering these treatments. For the avoidance of doubt

the JCCP acknowledges that no legal statute exists in the United Kingdom to restrict the right of either Beauty Therapists or other persons to deliver these treatments’.

[REDACTED]
Chair of the JCCP Board Of Trustees

21

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

Sent: 07 August 2018 09:42

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

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

[REDACTED]@gov.scot; [REDACTED]@ggc.scot.nhs.uk

Subject: RE: Cosmetics Interventions Group

Dear [REDACTED]

This is a very helpful reply. We would be delighted if you speak to [REDACTED] and follow-up on this business. We also wondered whether it is possible to meet with you and [REDACTED], plus the Chair of the cosmetic interventions regulation group, [REDACTED] (cc'd above) shortly before the next meeting (which is on the 23rd October). If that sounds possible, we will be in touch with dates, and aim to meet in Glasgow - where you and [REDACTED] work.

Best wishes, [REDACTED]

[REDACTED]
[REDACTED]
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

22

From: [REDACTED]

Sent: 06 August 2018 16:58

To: [REDACTED]

Cc: [REDACTED]

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

[REDACTED]

23

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

Sent: 06 August 2018 11:31

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

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

Subject: FW: Cosmetics Interventions Group

Dear [REDACTED] and [REDACTED]

I look forward to meeting you [REDACTED], 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, [REDACTED]

[REDACTED]
[REDACTED]
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

24

From: [REDACTED]@doctors.org.uk>

Sent: 04 August 2018 11:10

To: [REDACTED]@gov.scot>

Cc: [REDACTED]@ggc.scot.nhs.uk; [REDACTED]@gov.scot>;

[REDACTED]@ayrshire.ac.uk; [REDACTED]@gov.scot>;

[REDACTED]@glasgow.gov.uk; [REDACTED]@gov.scot>;

[REDACTED]@dermalclinic.co.uk; [REDACTED]@nhs.net; [REDACTED]@babtac.com;

[REDACTED]@aberdeenshire.gov.uk; [REDACTED]@ftt.scot;

[REDACTED]@gov.scot>; [REDACTED]@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.

[REDACTED], 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,

██████████

25

From: ██████████
Sent: 18 September 2018 11:12
To: ██████████@sqa.org.uk>
Subject: RE: Eduqual & JCCP meetings

Hi ██████████

Hope the holiday is/was fun!

I know you won't catch up until your return but thought I would drop this into your inbox anyway.

Meeting with [REDACTED] on 26th is now cancelled. He's off to Zagreb with the Chairman of JCCP apparently.

[REDACTED] - Out of scope

He says he'll catch up with me after the JCCP tele-kit with Scot Gov.

Therefore, not sure what you want to do regarding travel now. So, hedged our bets by asking [REDACTED] to book us both into a hotel on 26th on the basis that it would be an early start on 27th at EduQual (around 9.30ish).

(I will be flying down mid-afternoon on the 26th.)

However, it is easy enough to cancel your hotel booking if you are happy to travel in from Oxford on the morning of the 27th. I assume you'll sort out your own travel arrangements?

Lastly, I'll respond to [REDACTED] email regarding timings, focus and agenda and copy you in.

Cheers

[REDACTED]

26

From: [REDACTED]
Sent: 13 September 2018 08:18
To: [REDACTED]
Subject: Eduqual & JCCP meetings

Hi [REDACTED]

You will see that [REDACTED] has been in touch regarding meeting times and agenda - I thought that would be better coming from you so that you could work around flight times etc. I can just fit in with the times that suit you. Just let me know.

Re. agenda - I was just thinking focus on the conditions, data management ([REDACTED] suggested this), review of Injectables and reporting, possibly QA process in action - but again happy to leave that to you.

Same with JCCP meeting - can tie in with times to suit your flights etc.

On holiday from 14 to 24 so won't pick up emails regarding times etc till then.

[REDACTED]

27

From: [REDACTED]
Sent: 13 December 2023 16:14
To: [REDACTED]@gov.scot; [REDACTED]@sqa.org.uk
Cc: [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@gov.scot;

██████████@gov.scot; ██████████@gov.scot; ██████████@gov.scot; ██████████@gov.scot
Subject: RE: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Good afternoon, ██████████

Please find attached an updated copy of our paper that we sent last week. We've added your questions at the bottom and responded accordingly. Hopefully, the responses will make things a little clearer.

However, if you need any further clarification let me know. ██████████ and I will be happy to meet you or your colleagues again early in the New Year to discuss further.

Meantime, I hope you all have a great Christmas and New Year.

Kind regards

██████████

28

From: ██████████@gov.scot

Sent: Monday, December 11, 2023 2:55 PM

To: ██████████

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

██████████@gov.scot; ██████████@gov.scot; ██████████@gov.scot; ██████████@gov.scot

Subject: RE: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Hi ██████████ and ██████████,

I echo everyone's thanks for meeting up with us and for your very helpful information. Not fully understanding everything you covered, I personally have a few questions.

- As ██████████ said we are looking at the work being undertaken by UK government (UKG) for licensing of non-surgical cosmetic procedures in England and we are considering the procedures in the 'red, amber, green' list for Scotland. We do appreciate that the UKG will need to undertake further consultation and work to address the qualifications that may be required under licensing however, are you able to you give an indication of the number of procedures in the UKG list that are already covered by regulated accreditation? Apologies if I've got the wrong terminology.
- If Scotland regulates non-surgical cosmetic procedures and requires people to have an accredited qualification to carry out the procedures, what would the accreditation process be from start to finish should a new procedure come onto the market and be regulated? For example, who sets the standards required for the qualification right through to SQA accreditation and the selection of awarding bodies and approved training providers? You did cover this but I'm trying to get it clear in my head.

- Can you clarify the roles of Awarding Bodies (e.g. VCTC) and other organisations such as HABIA in regards to accreditation and qualifications?
- You mentioned offering progression to Level 11 for those people (beauty therapists?) who may wish to be qualified in Aesthetic Injectable Therapies. If a decision is made to restrict these therapies to healthcare professionals, would you still need a progression pathway for the non-healthcare professionals?
- On a linked but separate matter, we are often made aware of companies claiming to offer accredited training in aesthetics. I know that the Advertising Standards Authority (ASA) has responsibility to follow up misleading advertising but does SQA also have a role if companies wrongly claim to provide accredited training? Or do you link in with ASA?

There is no rush to answer but I would be grateful if you could copy my colleagues into your response.

In the meantime, have a lovely Christmas and New Year.

[REDACTED] | Safety, Openness and Learning Unit | Healthcare Quality and Improvement Division | Directorate of the Chief Operating Officer | The Scottish Government

29

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

Sent: 08 December 2023 16:41

To: [REDACTED]@gov.scot>

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

Subject: RE: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Hi [REDACTED]

Yes, we were aware of the UK Government consultation, but thanks for the information on the classification of the procedures etc.

[REDACTED] and I have produced a briefing paper, see attached which we hope will aid further discussions on Monday when we meet.

Have a good weekend.

Kind regards

[REDACTED]

[REDACTED]

30

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

Sent: Thursday, December 7, 2023 4:38 PM

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

Cc: [REDACTED]@gov.scot

Subject: RE: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Dear [REDACTED] and [REDACTED].

You will most probably be aware of the attached list of procedures from the UK Government's consultation on the licensing of non-surgical cosmetic procedures. The Scottish Cosmetics Intervention Expert Group discussed these procedures and their red, amber and green classification at the meeting in November. I thought I would share the list with you in advance of our meeting to assist with discussions about current and proposed qualifications that may link with the procedures.

If there are any papers that you would like me to share with anyone for the meeting, please let me know.

Kind regards,

[REDACTED] | Safety, Openness and Learning Unit | Healthcare Quality and Improvement Division | Directorate of the Chief Operating Officer | The Scottish Government

31

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

Sent: 29 November 2023 13:50

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

Cc: [REDACTED]@gov.scot>

Subject: RE: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Good afternoon [REDACTED]

Nice to hear from you and hope you and colleagues are well.

Yes, for our sins, [REDACTED] and I remain the relevant contacts for this sector. Happy to meet and discuss current developments from a qualification standpoint. The most suitable date for us both would be Monday 11th at 11 am.

Hope that suits.

Kind regards

[REDACTED]

32

From: [REDACTED]@gov.scot <[REDACTED]@gov.scot>
Sent: Tuesday, November 28, 2023 5:00 PM
To: [REDACTED]@sqa.org.uk; [REDACTED]@sqa.org.uk
Cc: [REDACTED]@gov.scot
Subject: Meeting SQA and Scottish Government - Non-surgical cosmetic procedures

Dear [REDACTED] and [REDACTED],

I'm not sure if you are still in the same role as back in 2021 when we last contacted each other. If not, I would be most grateful if you could pass on this request to the appropriate person and/or advise who we should now contact at SQA.

We recently held a meeting of the Scottish Cosmetics Interventions Expert Group (SCIEG) in regards to possible regulation of non-surgical cosmetic procedures in Scotland. At that meeting we discussed the various non-surgical procedures. We will have a follow-up meeting with SCIEG towards the end of January at which we would like to discuss qualifications and training for non-surgical cosmetic procedures.

In 2021, you very kindly provided us with information on available provision and the potential role of SQA accreditation in regards to non-surgical cosmetic procedures. In advance of the next meeting of SCIEG, we would find it very helpful if you could spare time to meet with us to provide an update and any further information. If you could let me know if either of the following times would suit you to meet up, I can send you a Teams calendar invitation.

- Monday 11th December at 11am
- Tuesday 12th December at 2pm

Thank you in advance.

[REDACTED] | Safety, Openness and Learning Unit | Healthcare Quality and Improvement Division | Directorate of the Chief Operating Officer | The Scottish Government

33

From: [REDACTED]@sqa.org.uk
Sent: 20 June 2018 10:30
To: George Brown <George.Brown@sqa.org.uk>; [REDACTED]@sqa.org.uk; [REDACTED]@sqa.org.uk
Subject: RE: SCIEG phase 2

Thanks George.

As [REDACTED] 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 [REDACTED]?)

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/CPSA 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 CPSA 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

██████████

34

From: George Brown

Sent: 19 June 2018 16:18

To: ██████████

Subject: FW: SCIEG phase 2

FYI

██████████ – in my reply to ██████████, I have said that you will need to be included in the meeting.

██████████ – would you want to be included?

Cheers

George

George Brown
Head of Accreditation
SQA Accreditation

35

From: [REDACTED]@gov.scot <[REDACTED]@gov.scot>
Sent: 19 June 2018 16:12
To: George Brown <George.Brown@sqa.org.uk>
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

36

From: George Brown <George.Brown@sqa.org.uk>
Sent: 03 July 2018 13:38
To: [REDACTED]@gov.scot
Cc: [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@sqa.org.uk;

[REDACTED]@sqa.org.uk>

Subject: RE: SCIEG phase 2

[REDACTED]

As per our telephone conversation, EduQual has agreed to share its unit specifications with you so you can get an idea of the content. [REDACTED] 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 [REDACTED] 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 Karen which we hope is of assistance

Regards

George

George Brown
Head of Accreditation
SQA Accreditation

37

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

38

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

39

From: [REDACTED]

Sent: 25 June 2018 13:17

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

Subject: RE: SCIEG

Thanks [REDACTED]

Really useful. Just realised that we are purportedly dealing with the 'Scottish Clinical Interventions Group' on Wednesday? Wonder if this is a working group recommended by SCIEG? Had a read at the SCIEG Report again but there is no mention of such a group and like you, I can't find anything on them at all.

[REDACTED]

40

From: [REDACTED]
Sent: 25 June 2018 11:59
To: [REDACTED]
Subject: RE: SCIEG

Just found this article on HIS site (see below). It seems that they are the same group that originally reported in 2015 (re independent clinics being registered/regulated) and this is phase 2. Although can't find anything else since this (since 2016 when the clinics started to be regulated). There is mention that SCIEG suggested a phase 2 Beauticians and beauty therapists that provide cosmetic treatments are not included in the definition of an independent clinic and therefore will not be required to register with us. The Scottish Cosmetic Interventions Expert Group recommended a second phase of change, which will bring non-surgical cosmetic treatments provided by other professionals into an appropriate regulatory framework.

I saw it mainly aimed at 'professionals' and I don't agree with [REDACTED] (or SCIEG) that as healthcare professionals are already registered then they don't need a qual (this qual is to upskill and provide a specialist qual to confirm their competence). However, there would be nothing wrong with others undertaking this qualification assuming they would be able to achieve it (this would certainly upskill all those carrying out these procedures and provide some confidence that they were being carried out correctly especially as at the moment they are not regulating the beauty therapists/non healthcare sector)

Also found this ToR for a group The Independent Healthcare Programme Board which was established to advise on the Regulation of Clinics (not sure if it is still operational but [REDACTED] [REDACTED] (the guy we will be speaking to on Wed) was on it)

http://www.healthcareimprovementscotland.org/our_work/inspecting_and_regulating_care/independent_healthcare/regulation_of_clinics/regulation_of_clinics_faqs.aspx

[REDACTED]

41
From: [REDACTED]
Sent: 25 June 2018 11:25
To: [REDACTED]@sqa.org.uk>
Subject: RE: SCIEG

Okay I'll phone him.

My original thinking was to just try and confirm the JCCP position on healthcare professional undertaking a qualification. My recall was that JCCP believed this to be the case. Particularly as [REDACTED] seems to have pushed the line that the SCIEG doesn't believe it to be necessary for professionals as to undertake further quals they are already GMC/equivalent registered and therefore competent!

I read the spec for the Diploma again and I'm slightly worried by the references to non-h/care professional being able to undertake it, even if they are HEE registered (That in itself might be a sore point with Scot Gov!).

I'm not sure what line George is taking on this. He hasn't mentioned it. Don't even know if we'll be in the same room!

Good point on [REDACTED]. My thinking was the other way around in that we advise of the meeting and check if he would be comfortable with us sharing the qual spec....but I think you are right. We know zilch about these people and can't be sure that any commercially information won't find its way to another AB. Think we should hold to the line of a formal request being made from George/SCIEG/ScotGov if they want to see the details.

Not sure what/how this group came about. They are not named in the original report as far as I can see but I'll search again.

[REDACTED]

42

From: [REDACTED]
Sent: 25 June 2018 11:03
To: [REDACTED]@sqa.org.uk>
Subject: RE: SCIEG

Yes, think it would be useful to contact [REDACTED]. Is this group the original group that recommended that HIS regulate the clinics (but it has just been revived/reformed)? I haven't been able to find anything out about them yet.

I take it George hasn't spoken to you about how we approach the telekit etc? Really not sure what George's intentions are re this telekit!

Not sure about contacting [REDACTED] yet – if we don't tell him then we could have the excuse that we can only share some information with this group (not the detail of the qual etc).

[REDACTED]

43

From: [REDACTED]
Sent: 25 June 2018 10:56
To: [REDACTED]@sqa.org.uk>
Subject: SCIEG

Thinking of phoning [REDACTED] at JCCP to see if he knows anything about SCIEG. Thoughts?

Also, do we need to make [REDACTED] aware of this tele-KIT? Or do we sit tight and see what happens?

[REDACTED]

44

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 [REDACTED] yesterday and he dropped us an email that VTCT had been approved.

Kind regards,

[REDACTED]

45

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]

46

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]

47

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]

48

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

Sent: 11 March 2021 16:01

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

Subject: SCIEG

Here is the briefing paper I have started just to try to capture some of the things we might want to raise on Monday. I have also attached the SCIEG (sub group) minutes and some extracts from JCCP website etc. I have also attached a copy of the ScotGov consultation documents. Although we really need ScotGov to share with us the outcomes of the consultation and the direction of travel before we will know if we have any part/role to play.

[REDACTED]

49

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

