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Tina Mccaffery  
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Our Reference: 202600523109

14 July 2026

Dear Ms Mccaffery

## **REQUEST UNDER THE FREEDOM OF INFORMATION (SCOTLAND) ACT 2002 (FOISA)**

Thank you for your request dated 19 June 2026 under the Freedom of Information (Scotland) Act 2002 (FOISA).

### Your request

You asked for information relating to the development of secondary legislation under the Non-surgical Procedures and Functions of Medical Reviewers (Scotland) Act 2026, specifically:

1. A list of all organisations, bodies, stakeholders and individuals who have been consulted, engaged or involved in discussions relating to the development of secondary legislation under the Act.
2. Details of any stakeholder engagement plans, working groups, advisory groups, steering groups or consultation mechanisms established in relation to the secondary legislation.
3. Copies of any meeting minutes, attendee lists, briefing papers, agendas or notes relating to meetings concerning:
  - Practitioner qualifications
  - Competency requirements
  - Education and training standards
  - Licensing requirements
  - Treatment groupings
  - Implementation arrangements
4. Details of any organisations that have provided evidence, advice or recommendations regarding education, training, competency or qualification requirements for practitioners.



5. Details of any planned future stakeholder engagement activities relating to the development of secondary legislation.
6. Copies of any workforce analysis, impact assessments, research, modelling or reports undertaken regarding the existing qualifications held by practitioners operating within Scotland's non-surgical aesthetics sector.
7. Details of any analysis undertaken to establish:
  - The number of practitioners currently operating within Scotland;
  - The qualifications currently held by practitioners;
  - The number of practitioners holding regulated Level 4, Level 5, Level 6 or Level 7 qualifications;
  - The number of approved training centres operating within Scotland.
8. Copies of any equality impact assessments, business impact assessments, economic impact assessments or rural impact assessments undertaken in relation to the implementation of the Act and the development of secondary legislation.

## Response to your request

### Question 1

The final form of the Act was not known until the 18 March, when the Bill was passed by the Scottish Parliament. Officials have met with Healthcare Improvement Scotland (HIS) for informal discussions relating to implementation of the Act, including early discussion on requirements for secondary legislation.

### Question 2

No stakeholder engagement plans, working groups, advisory groups, steering groups or consultation mechanisms have yet been established or taken place in relation to the secondary legislation, and so this is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested.

### Questions 3 and 4

There have been no official meetings relating to practitioner qualifications, competency requirements, education and training standards, licensing requirements, treatment groupings or implementation arrangements. Therefore this is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested.

Officials have had some informal initial discussions with the University of the West of Scotland and Glasgow College regarding training and qualifications. I have enclosed at Annex 1 a copy of notes which have been made on the basis of these discussions. Note that no decisions have been made on training and qualification requirements, and that further engagement will take place with a wide range of stakeholders from the sector once this work is being progressed.

### Question 5

The Scottish Government has not yet planned any stakeholder engagement activities relating to the development of secondary legislation, therefore this is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested.

## Questions 6 and 7

The Scottish Government has not yet undertaken any workforce analysis, impact assessments, research, modelling or reports undertaken regarding the existing qualifications held by practitioners operating within Scotland's non-surgical aesthetics sector. Nor has it yet carried out analysis of the number of practitioners currently operating in Scotland, qualifications currently held by practitioners, the number of practitioners holding regulated Level 4, Level 5, Level 6 or Level 7 qualifications, or the number of approved training centres operating within Scotland. Therefore this is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested.

An estimation was made of the number of businesses likely to be affected by the legislation in the [Financial Memorandum](#) and the [Business and Regulatory Impact Assessment](#) which were prepared for introduction of the Non-surgical Procedures and Functions of Medical Reviewers (Scotland) Bill in October 2025.

## Question 8

No impact assessments have been undertaken specifically in relation to the implementation of the Act and the development of secondary legislation. The following impact assessments were published in October 2025 on the Scottish Government's website, and contain information relevant to implementation of the Act. As with all impact assessments, these documents will be reviewed as required.

- [Equality and Fairer Scotland Duty impact assessment](#)
- [Business and Regulatory impact assessment - gov.scot](#)
- [Island Communities impact assessment consideration](#).

Under section 25(1) of FOISA, we do not have to give you information which is already reasonably accessible to you. If, however, you do not have internet access to obtain this information from the website(s) listed, then please contact me again and I will send you a paper copy.

## Your right to request a review

If you are unhappy with this response to your FOI request, you may ask us to carry out an internal review of the response, by writing to:

Caroline Lamb, DG Health and Social Care, C/O [FOI@gov.scot](mailto:FOI@gov.scot), or C/O this postal address:

FOI Unit

1E.10,

St Andrew's House,

Regent Road,

EDINBURGH EH1 3DG].

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review in accordance with FOISA as soon as possible, and not later than 20 working days from the day following the date we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish

Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at [Appeal to the Commissioner | Scottish Information Commissioner](#).

Kind regards



Jenny Hunt  
**Senior Policy Manager**