


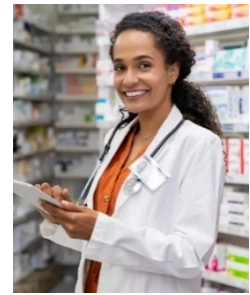



INJECTABLE COSMETICS

This leaflet aims to give advice to people who provide cosmetic procedures such as botulinum toxin, filler, fat dissolving and vitamin injections, but who are not medical professionals.


You, as a business owner, are legally responsible for ensuring that the medicines which you give to your clients, come from a person who is suitably qualified and competent to prescribe aesthetic medicines. To help you know whether your prescriber is qualified and competent, here are some things to think about:


 To comply with best practice and guidance, you should get your botulinum toxin and other prescription only medicines from a prescriber who has a qualification in aesthetics (preferably a course endorsed by the JCCP, CPSA, etc.). A prescriber who has no qualifications in aesthetics (over and above the qualification which allows them to prescribe) is likely to be working outside their scope of competence and could be putting your clients at risk. Would you want a Chiropodist to operate on your heart? Just because someone has a medical qualification e.g. in nursing or Pharmacy, this doesn't mean they are trained in aesthetics or have enough understanding to advise on treatments and manage complications, even though they might be able to give you a prescription.



 A reputable prescriber, who is competent in aesthetics, will only prescribe botulinum toxin after a face-to-face consultation with the client. Their professional registration bodies don't allow them to prescribe medicines for cosmetic treatments to someone they haven't seen face to face and they risk being struck off if they do this. On-line consultations (e.g. via Skype or Zoom) do not count as a face-to-face consultation. You might have been prescribed medicines from a doctor or nurse at your G.P. surgery without seeing them first, and this is fine, but the rules are different for cosmetic procedures, where this is not allowed. Pharmacist prescribers are not allowed to prescribe cosmetic medicines for a non-medical professional to administer at all, and again risk being struck off if they do this.



 A reputable prescriber will only prescribe licenced medicines. Unlicenced medicines such as Botulax, Liporase and Lemonbottle are only available illegally in the UK and should not be used.

 Both you and your prescriber are legally responsible for overseeing any complications which might arise from the use of prescription only medicines. If your client suffers an extreme allergic reaction (anaphylactic shock) or blocking of a blood vessel (vascular occlusion) after receiving treatment, both you and your prescriber are legally responsible for this. Is your prescriber going to be there when there is a complication? You are responsible for choosing a prescriber who will be.



If you are using a website to obtain your prescriptions, how do you know if you are using a reputable prescriber with the correct qualifications? How will this prescriber share in your legal responsibility if a complication arises? Will you be left “carrying the can” if something goes wrong and you don’t know who they are?

Managing Complications

To follow Resuscitation Council UK guidelines you must have a minimum of 2 doses of adrenalin available on your premises to treat anaphylaxis. It is illegal for a prescriber to give adrenalin to a non-medical unless it has been specifically prescribed to them for their own use. If adrenalin has been prescribed to you as a practitioner, it is illegal for you to provide this to your client, even in an emergency.



In the case of a vascular occlusion, a minimum of 2 vials of hyaluronidase (Hyalase) need to be available very quickly to stop tissue dying on your client’s face (necrosis). Again, it is illegal for a prescriber to give hyaluronidase to a non-medical unless it is specifically prescribed for the use of the person named on the prescription. If you hold hyaluronidase which has been prescribed to you, it is illegal for you to use this for anyone else.

You cannot depend on an accident and emergency department to treat complications such as vascular occlusion. It is not their responsibility to treat complications from a procedure which you have provided, and they do not carry hyaluronidase to treat such issues. Waiting times at accident and emergency departments can be very long and it is your responsibility to ensure that your client is treated within as short a time as possible to prevent permanent damage to your client. You must also have in place someone other than the NHS who will treat other complications such as infections, and who is able to prescribe any necessary medications such as anti-biotics.



At the moment, procedures such as botulinum toxin, fillers, fat dissolvers and other injectable cosmetics are not covered by licencing regulations, and so aren’t licenced by the Local Authority the way that people giving tattoos, acupuncture and microblading need to be. It is hoped that only private medical clinics, regulated by Healthcare Improvement Scotland will be able to provide such treatments in the near future.

Even though you may not need a skin piercing licence, the legal requirements explained above about choosing your prescriber and about being able to treat complications, without holding and administering adrenalin and Hyaluronidase illegally, still apply to you.

Should you wish to discuss the contents of this leaflet further, please contact:

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