



UK Health  
Security  
Agency

# **“From Chaos to Control: Rewriting the Rules for Non-Surgical Cosmetic Procedures”**

**Kate James- Out Posted Scientist UKHSA, Carol Chatt-Consultant Epidemiologist and Head of Field Service Midlands, Charlotte Rose – Team Lead Environmental Health Wolverhampton City Council, Janet Bradley - Environmental Health Operations Manager (Public Health Lead Team) Birmingham City Council**

# Agenda

Welcome and Introduction to speakers – Kate James

Aims and Objectives

Legislation current and future – Charlotte Rose

Case study – Vampire Facials –Charlotte Rose and Carol Chatt

Understanding the size of the problem- Carol Chatt

Case Study –Glutathione Infusion –Janet Bradley

Strengths, Weakness, Threats and Challenges - Janet Bradley

Next steps

# Aims

**“To provide an overview of the public health, regulatory, and enforcement challenges associated with non-surgical cosmetic procedures, and to inform future local authority approaches to safeguarding residents and improving standards within the sector.”**

# PUBLIC HEALTH, REGULATORY, AND ENFORCEMENT CHALLENGE

- **Industry Growth and Risk Variability**

Rapid industry growth has led to practitioners with varied training levels, increasing treatment risks and quality disparities.

- **Fragmented Regulatory Landscape**

Regulatory gaps allow unqualified providers to operate, complicating compliance monitoring and enforcement.

- **Enforcement Challenges**

Lack of robust licensing and limited inspection tools hinder consistent enforcement by local authorities.

- **Emerging Risks and Vulnerable Groups**

New treatments and social media marketing increase risks, especially among youth influenced by online trends.

# Regulatory Preparedness

**“To highlight current gaps in the regulatory landscape for cosmetic procedures and support councillors in understanding the implications of forthcoming licensing reforms.”**

# Evidence-Based Decision Making

- **“To present evidence on emerging risks linked to cosmetic procedures and support informed decision-making on local enforcement and public health priorities.”**

# Partnership Working

- **“To identify the challenges faced across environmental health, public health, and regulatory services in managing cosmetic therapies and explore how collaborative approaches can enhance safety.”**

# How big is the public health threat?



# Regulating Non Surgical Cosmetic Procedures

West Midlands DPH Conference  
27 March 2026

Presenter:

**Charlotte Rose**

Team Leader, Environmental  
Health

[wolverhampton.gov.uk](http://wolverhampton.gov.uk)

## Current regulatory framework

- Health and Safety at Work etc Act 1974 & associated regulations
  - Prohibition notices
  - Improvement notices
- Public Health (Control of Disease) Act 1984
- Health Protection [Part 2a Orders] Regulations 2010
- Health Protection (Local Authority Powers) Regulations 2010
- The Environmental Protection Act 1990
- Botulinum Toxin and Cosmetic Fillers (Children) Act 2021
- Anti-Social Behaviour – Civil Injunction, Criminal Behaviour Order
- The Local Government (Miscellaneous) Provisions Act 1982

## Licensing of non surgical cosmetic procedures

- July 2022 – section 180 of the Health & Care Act 2022 came into force
- Providing powers to the Secretary of State for Health & Social Care to introduce regulations
- Regulation for those offering non-surgical cosmetic procedures, including for both high street and home-based clinics
- Prohibition against those carrying out specified cosmetic procedures
- Local authority administration and enforcement – Environmental Health/Trading Standards
- First consultation response – August 2025 (11, 800 responses)
- The scheme will not include scope for procedures currently subject to registration
- Highest risk procedures brought into CQC oversight, and restricted to suitably qualified and regulated healthcare professionals

# Licensing of non surgical cosmetic procedures

## Definition of a cosmetic procedure:

“a procedures, other than a surgical or dental procedure, that is or may be carried out for cosmetic purposed; and the reference to a procedure includes:

- (a) the injection of a substance
- (b) the application of a substance that is capable of penetrating into or through the epridermis
- (c) the insertion of needles into the skin
- (d) the placing of threads under the skin
- (e) the application of light, electricity cold or heat”

## **Licensing of non-surgical cosmetic procedures**

- Premises and practitioner licence
- Risk based inspection frequency
- Suitable training and qualifications - approved providers
- Indemnity insurance
- Protection of children from harm – minimum age requirements
- Provisions for imposition of fees, creation of criminal offences and financial penalties
- Public register

# Licensing of non surgical cosmetic procedures

- RAG rated system:

RED – Buttock, breast and genital augmentation, COG/PDO Threads, IV Drips

AMBER – Prescription only medicines (Botox, Weight Loss, Vitamins) with oversight

Semi permanent dermal fillers (facial), Radiofrequency treatments

GREEN – Microneedling, Laser hair removal, Mesotherapy, Chemical peels,

No needle fillers


- Further consultations – priority for the RED category procedures during 2026
- Implementation for local authority licensing - likely 2027 - 2028

# National concerns

THE STANDARD

## Mother-of-five, 33, first to die from UK 'Brazilian Butt Lift' as two arrested

Alice Webb is thought to have died after complications from undergoing the medical procedure in Gloucester



BirminghamLive NEWS WHAT'S ON BLACK COUNTRY VI

BUY A PAPER FUNERAL NOTICES JOBS ADVERTISE WITH US DIRECTORY NEWSLET

B > Black Country > Wolverhampton


## Bum lift ban in Wolverhampton over fears procedure could lead to 'serious injury or death'

Clinique Modele Aesthetics was served a prohibition notice by City of Wolverhampton Council

Comments 4

BLACK COUNTRY By Kelly Ashmore Senior Reporter

16:00, 11 May 2023 Updated 16:20, 11 May 2023



BirminghamLive

NEWS IN YOUR AREA BLACK COUNTRY VILLA BIRMINGHAM

BLACK COUNTRY

## Black Country people are having illegal 'botox' injections that could leave them 'disfigured'

Health chiefs have made an urgent warning

SHARE

BY JAMIE BRASSINGTON  
15:29, 23 MAY 2022



ECHO NEWS IN YOUR AREA LFC EVERTON FC

BUY A PAPER FUNERAL NOTICES JOBS ADVERTISE WITH US REACHSPORTSHOP BOOK

News > UK & World News > Health

## Daughters of mum who died after taking 20 'skinny jabs' issue heartbreaking plea

Karen McGonigal, 53, died just days after being injected with a black market 'skinny jab'

NEWS By Chris Slater, Lucy Thornton and Olivia Williams Senior reporter

16:10, 28 Oct 2025

# Resource implications

wolverhampton.gov.uk

Local Authority	Complaints & Investigations	Est. Premises	Est. Practitioners	Est. Full time equivalent required
Birmingham	-	8,048	8,048	25
Coventry	15	123	270	4
Stoke on Trent	8	172	172	2
Newcastle Under Lyme	0	200	1000	2
Stratford	4	17	34	0.5
Wolverhampton	16	200	400	2

## Platelet Rich Plasma – PRP ‘Vampire Facial’

- PRP is produced from a person’s own blood
- Typically performed for both cosmetic and medical reasons;

**Cosmetic;** To improve skin texture, reduce fine lines, blemishes

**Medical:** To stimulate hair re-growth and in some cases to treat scars

- The procedure involves:
  - Phlebotomy
  - Use of a Centrifuge
  - Microneedling or Injection



**METRO.co.uk**

# Procedure

## STEP 1



### Blood Collection

A small amount of blood is drawn from the patient's arm.

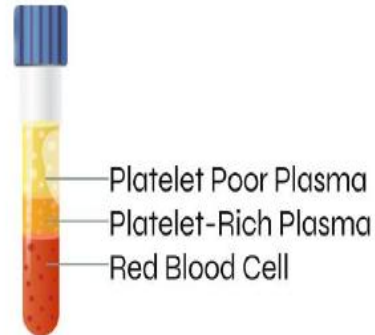
## STEP 2



### Separating Platelets

The blood undergoes centrifugation, separating the platelets from the rest of the blood.

## STEP 3



### Platelet-Rich Plasma

The patient's own platelet-rich plasma is now extracted from the test tube.

## STEP 4

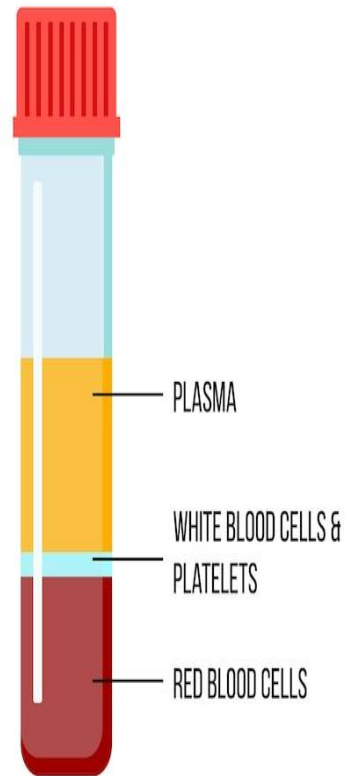


### PRP Injection

The plasma is injected and/or micro-needled into the affected area

- Full course is 3 – 6 treatments, spaced ~ 4 weeks apart
- Each session lasts between 30 to 90 minutes
- Costs £200 - £2000

# Equipment



## Risks and side effects

- **Common side effects;** Swelling, mild pain, redness, bruising, and itching after the procedure.
- **Risk associated with PRP;** Scarring, sun sensitivity, and infection at the injection or microneedling site. Tissue damage and nerve injuries may occur with inexperienced practitioners. Allergic reactions are low risk.
- **Infection risk;** Bacterial and BBV infections, from improperly sterilised equipment and poor infection prevention and control practice.
- **Contraindications;** Blood disorders or those taking blood thinners, active infections, active skin conditions, history of cancers, particularly blood related cancers.

## Background

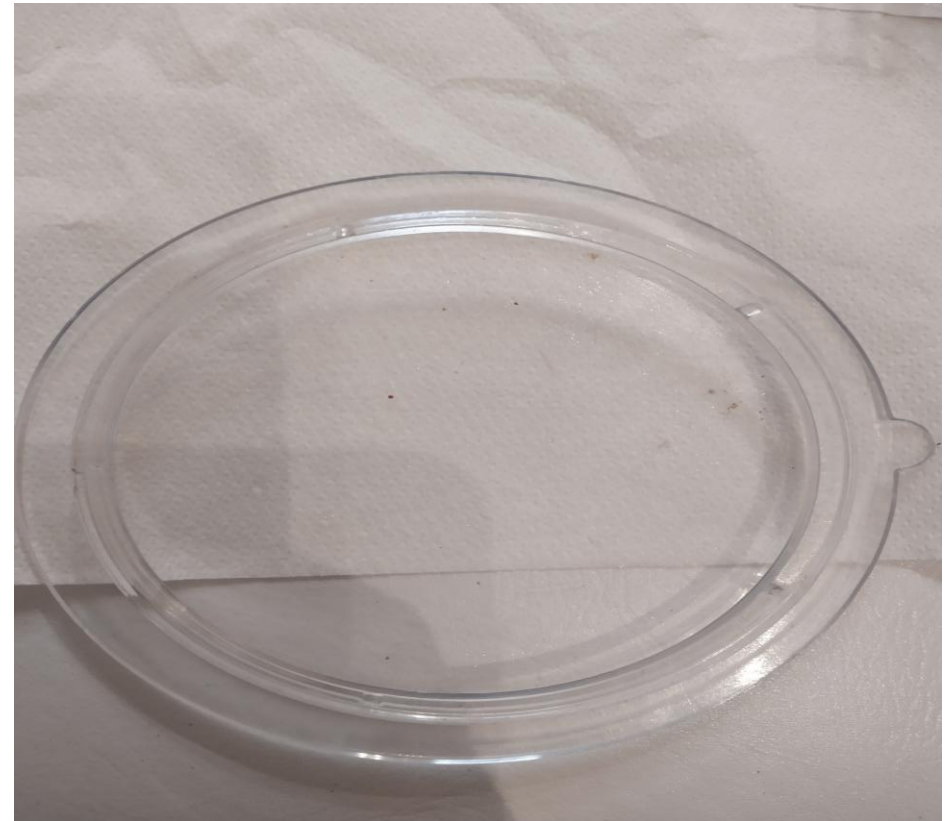
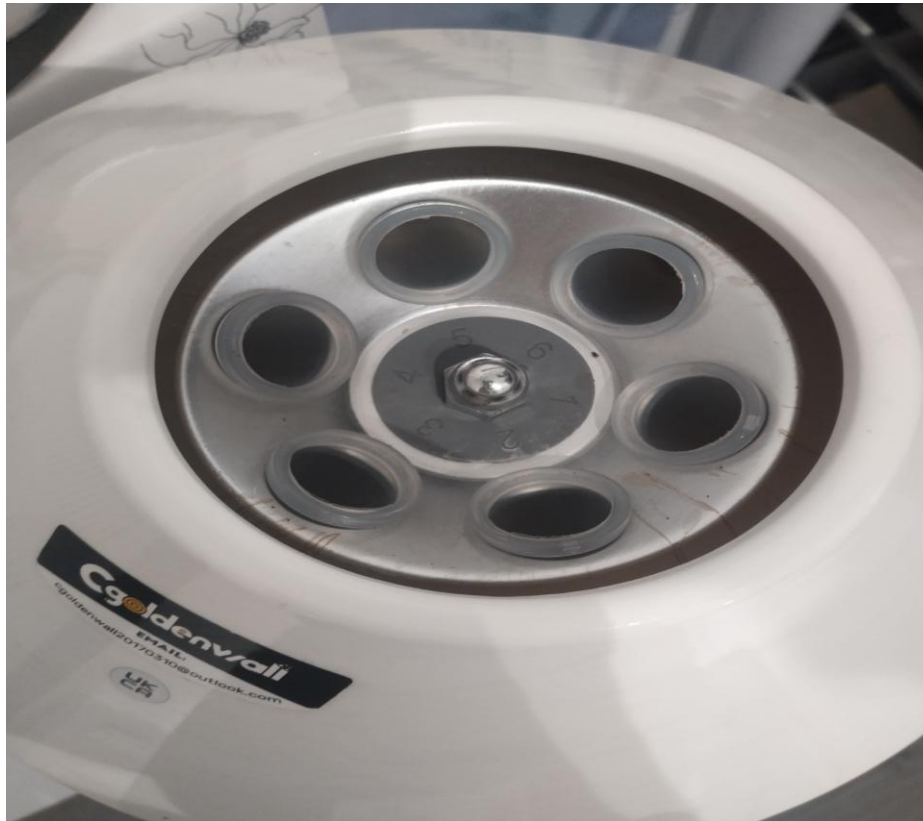
- Two complaints received by members of the public (including a trainee student)

*Poor infection prevention and control standards*

*Side effects following procedures*

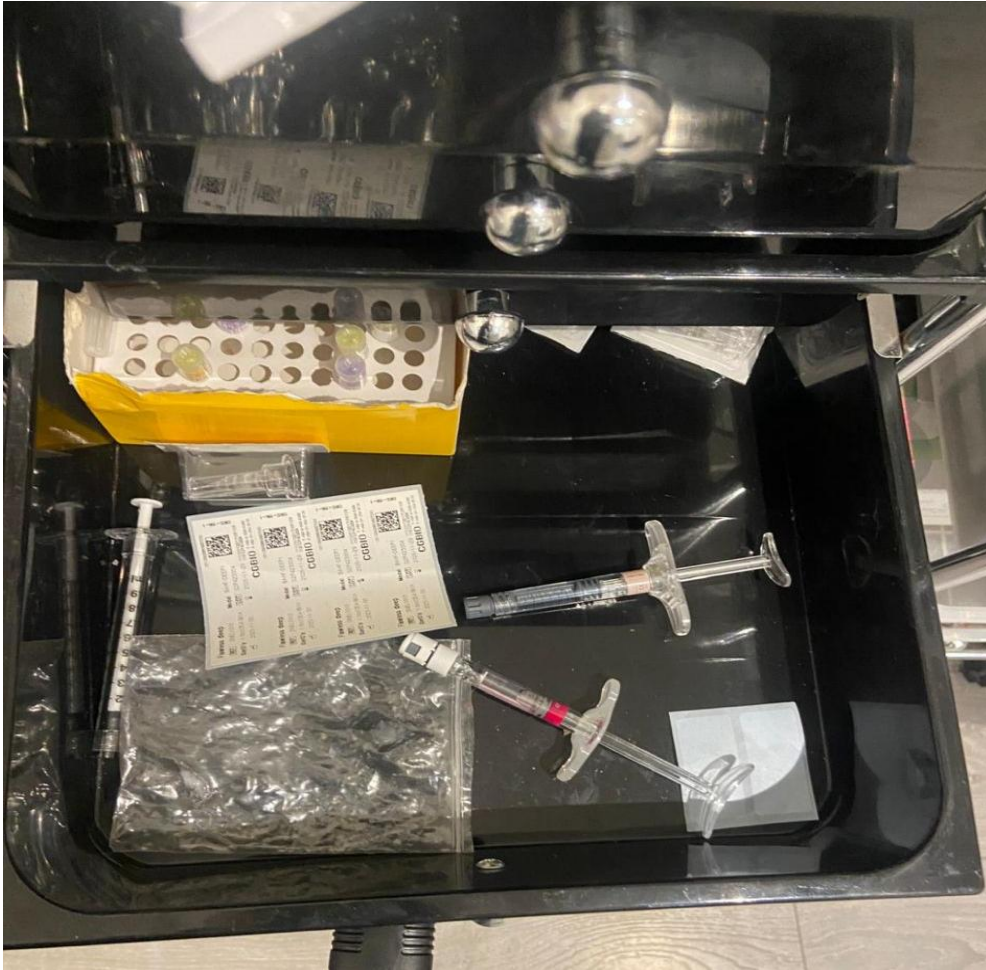
- Practitioner background; non healthcare, a trained beautician, CPD training across over 20 non-surgical cosmetic procedures, including Buttock Augmentation
- Operating without a legal premises and personal registration, including for semi permanent make up
- Offering an estimated 50 – 60 procedures, both invasive and non invasive

## Concerns identified on site – setting the scene



## Premises standards







## Observations and Findings

- Lack of training and competence
- Contaminated equipment
- Used sharps, syringes and half-filled vials
- Unlicensed medicines
- General standard of poor cleaning, incl. access to appropriate chemicals
- Poor facilities, incl. safe storage and removal of waste, hand washing
- Poor personal hygiene
- Absence of pre consultation procedures and records
- Poor aftercare

## **Actions taken**

- Unannounced site visits
- Immediate actions on site; Disposal of unlicensed medicines, used sharps and syringes
- Schedule of works issued
- Incident Management Meeting – UKHSA, ICB
- Support from the JCCP and MHRA
- Prohibition Notice served

### ***Health & Safety at Work etc Act 1974 – Section 3***

### ***Control of Substances Hazardous to Health 2002 –Regulation 7***

- Improvement Notices served

### ***Training – Infection Prevention and Control, Phlebotomy, PRP***

- Joint site visit with Infection Control Nurse

# Challenges and obstruction

- Many obstruction challenges, including delay tactics
- Limited powers available for access to digital records
- Request for client records – 16 received, which included family and friends
- One positive Hepatitis C case
- UKHSA Traceability Exercise – Public Alert

## [Warning issued over HIV risk to 'vampire facial' clinic | ITV News](#)

- 13 enquiries received
- Resource intense and lack of suitable legislation



The image is a screenshot of an ITV News article. At the top, the 'itvX' logo is visible on the left, and navigation icons for user profile and menu are on the right. Below the logo, the text 'itvNEWS' is followed by 'Your Area' and 'Categories' with dropdown arrows, and a search icon. The main headline reads 'Warning issued over HIV risk to 'vampire facial' clinic'. Below the headline, it is categorized under 'HEALTH | COSMETIC SURGERY' and dated 'Wednesday 11 June 2025 at 8:09pm'. The author is identified as 'Ellie Pitt, Reporter, ITV News'. A photograph shows a close-up of a person's face with a blue-tipped syringe being used for a facial treatment. Below the photo, a caption states: 'A 'vampire facial' is meant to improve skin texture and reduce wrinkles (stock photo). Credit: iStock'. The main text of the article begins with 'Clients who have had a facial treatment at a West Midlands beauty clinic are being urged to have a blood test, because they may have been infected with a HIV or hepatitis.' The 'itv.com' logo is at the bottom right of the screenshot.

## Conclusions

- MHRA confirmed that anyone offering for medical reasons will require marketing authorisation
- Readily available expertise and smarter ways of working
- National Guidance – to be announced for local authority regulators
- Training requirements
- Licensing of Non-Surgical Cosmetic Procedures

*Immediate prohibition powers*

*RED Category proposal*



## **Charlotte Rose**

Team Leader Environmental Health,  
City of Wolverhampton Council

[charlotte.rose@wolverhampton.gov.uk](mailto:charlotte.rose@wolverhampton.gov.uk)  
01902 552109

,

[wolverhampton.gov.uk](http://wolverhampton.gov.uk)



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# UKHSA perspective on IPC Failures in Vampire Facial Procedures *aka PRP (platelet-rich plasma) facial*

Dr. Carol Chatt

Consultant Epidemiologist and Head of Field Services Midlands



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# Outbreak of iatrogenic botulism associated with cosmetic injections of botulinum neurotoxin containing products in England, 2025

Dr. Carol Chatt

Consultant Epidemiologist and Head of Field Services Midlands



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Any Questions?

# UKHSA Food Water Environment Lab

- National Studies of hygiene indicators in Tattooists
- Study in 2018
- Study in 2024

# FWE National studies - XR36 (2018-19)

## Testing

- Ink was tested for Aerobic and Anaerobic bacteria per mL
- Water was tested for *Pseudomonas aeruginosa* per 100mL
- Diluted green soap was tested for *Pseudomonas aeruginosa* and Enterobacteriaceae per mL



## Target Results

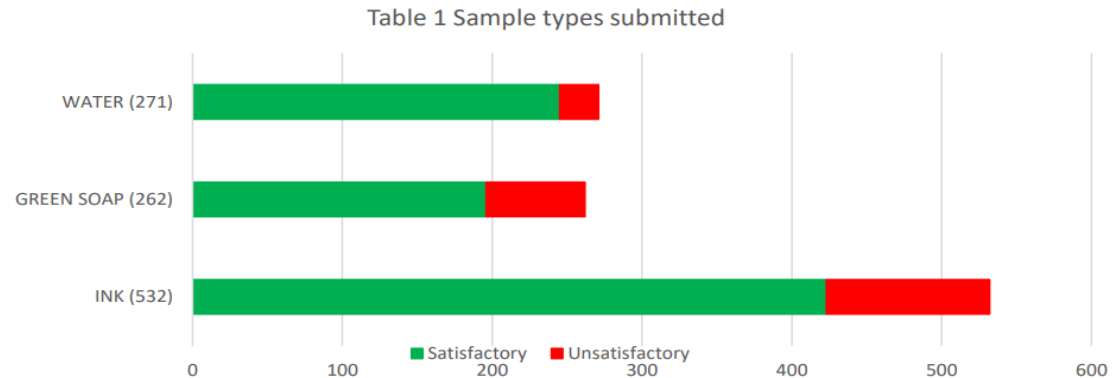
- Ink should be sterile (<20 cfu per mL)
- Water should not be contaminated with *Pseudomonas aeruginosa*
- Green soap should be free of Enterobacteriaceae and should not be contaminated with *Pseudomonas aeruginosa*

# XR36 Results

## 33 Local Authorities; 276 premises; 1065 samples

- 25 / 271 waters (10%)
- 66 / 262 green soaps (25%)
- 532 inks (20%)

- 54% (148/276) premises gave all satisfactory results
- 1% (3/276) premises gave unsatisfactory result for all samples tested



- 13 (5%) waters showed >100 cfu/100ml *Ps. aeruginosa*
- 34 (13%) green soap samples >100 cfu/ml *Ps. aeruginosa*
- 30 (6%) ink samples >100,000 cfu/g aerobic and/or anaerobic bacteria

# National Study 81 – Soaps and Disinfectants

<u>Soap/disinfectant</u>	Number of samples	%	Enterobacteriaceae unsatisfactory %	P. aeruginosa unsatisfactory %
Disinfectant equipment	132	20.72	1.6	0.81
Disinfectant equipment/skin	2	0.31	Not tested	0
Green soap	428	67.19	21.95	10.17
Green soap/disinfectant skin	2	0.31	50	0
Ink	5	0.78	0	0
Disinfectant skin	69	10.83	16.39	9.52

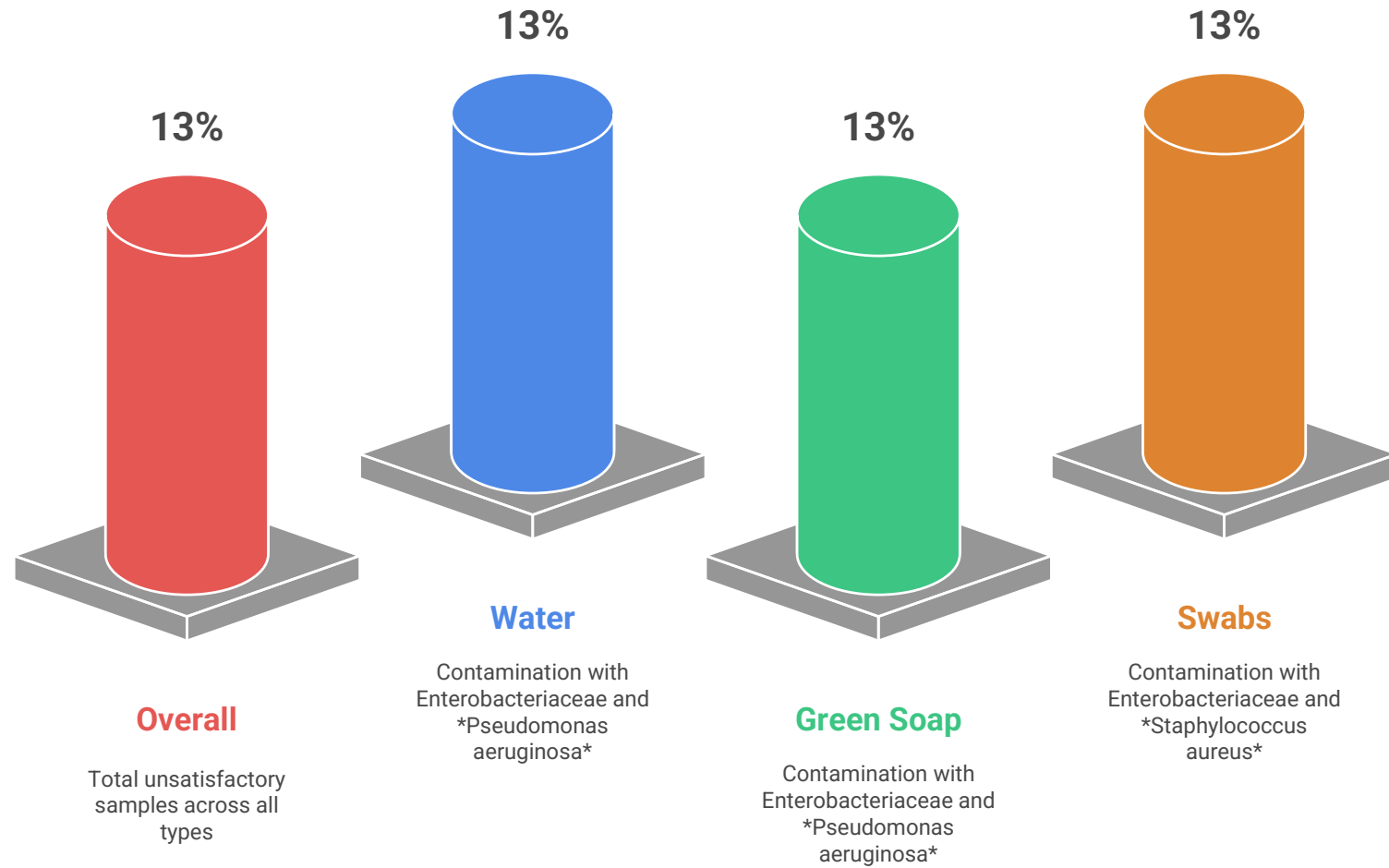
# National Study 81

National Study 81 – 2024/2025 General results – up till Dec 2024 – subject to change

Test	Satisfactory (n)	%	Unsatisfactory (n)	%	Premises type	n	%
Coliforms (n=663)	621	93.7	42	6.33	Beauty salon	72	2.09
E. coli (n=663)	663	100	0	0.00	Mobile unit	21	0.61
Enterobacteriaceae (n=2749)	1988	72.3	761	27.68	Piercing only	269	7.80
Pseudomonas aeruginosa (n= 3188)	3027	94.9	161	5.05	Piercing and tattoo	1201	34.81
S. aureus (n=2149)	2121	98.7	28	1.30	Tattoo only	1887	54.70
					Total	3450	

Q2 - Swabs	Number of swabs	%	Enterobacteriaceae unsatisfactory %	P. aeruginosa unsatisfactory %	S. aureus unsatisfactory %
Armrest	295	14.14	24.91	0.38	1.12
Headrest	444	21.27	28.96	0.27	1.96
Armrest/headrest	13	0.62	30.77	0.00	15.38
Instrument dishes	65	3.11	26.15	0.00	3.08
Other*	43	2.06	58.14	6.98	2.70
Not stated	4	0.19	25.00	0.00	0.00
Sanitiser bottle	244	11.69	31.15	1.23	0.49
Surface used for prep	488	23.38	29.67	0.24	0.91
Taps	489	23.43	33.47	4.06	0.92

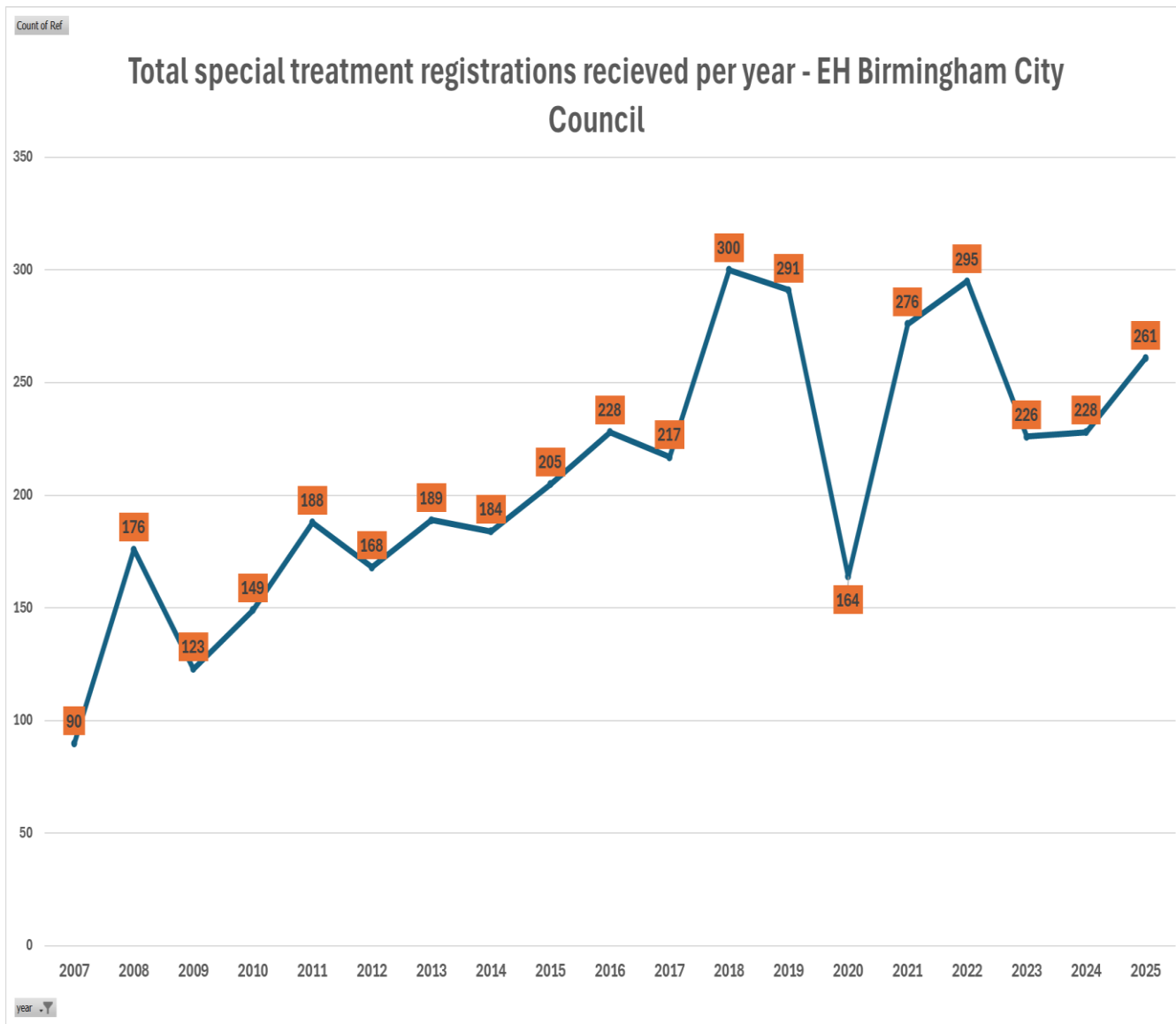
## Hygiene Study Results in Tattoo and Body Piercing Environments



# Birmingham City Council - Special Treatment registration – tattooing, skin piercing and acupuncture

- Janet Bradley

# Birmingham City Council - Special Treatment registration – tattooing, skin piercing and acupuncture



<b>Number of current premises with a special treatments registration in Birmingham</b>	<b>590</b>	
Number of current special treatments registrations	3970	Includes both premises and individual persons
Number of outstanding special treatments registrations not inspected	3147	Not inspected following : Covid; Commonwealth games and s114 notice (only statutory duties undertaken)
Number of hairdresser and beautician premises who do not have special treatment registration	1744	
Potential number of premises who could be licensed under new legislation	<b>2334</b>	There could be more as this is an old database. Most will not have been inspected. Does not include paratactic

UKHSA : notified over the weekend of a case of septic shock and potential liver damage requiring admission to ICU at MMUH. Believed Staphylococcus or Streptococcus infection

The case was admitted to ICU on the evening of Thursday

received glutathione infusion for skin lightening purposes at a hair/aesthetics salon in Birmingham.

The case has also been using Mounjaro injection 7.5mg weekly for weight loss for the past three months but this was the first exposure to Glutax.

The case is improving but may have long term liver damage.

## Glutathione Infusion

### Glutax 75G DCRP 750000

- Treatment advertised for skin whitening and anti-aging administered via IV (intravenous) infusion.



# Packaging label and ingredients



## ❑ 14 x 5ml vials DNA Cell Regenerating & Repair Agent

- TriStem Complex 750,000mg  
(Swiss Apple Stem Cell; Alp Rose Stem Cell; Opuntia Ficus-Indica Stem Extract)
- Tripeptide10 Citrulline 6,000mg
- Tripeptide-1 3,350mg
- Pseudoalteromonas Fermented Extract 600mcg
- Hexapeptides-37 1,200mg

## ➤ 14 x 2ml vials DNA Cell Melanin Inhibits Agent

- Lepidium Sativum Sprout Extract 550mg
- Liposomic Hyaluronic Acid 700mg
- Vitamin D 1,500mg
- Vitamin C 3,000mg
- Vitamin E 30mg

## ➤ 14 vials DNA Cell Detoxification & Super Anti-Oxidant Agent (powder)

- Total mineral elements 3,000mg
- Selenium 1,800mg
- Magnesium 500mg
- Lycopene 320mg
- EDTA (Ethylenediaminetetraacetic acid) 100mg
- Micronized Clinoptilolite Zeolite 50mg
- R-Lipoic Acid 2,000mg
- Cysteine 1,800mg
- Glycine 900mg
- Antioxidant Enzyme Complex 1,450mg

Italian



English

da vendersi dentro  
presentazione di  
ricetta medica

to be sold upon  
presentation of a  
medical prescription

The packaging would suggest that the product has been manufactured for sale in Italy but was likely imported from Asia prior

**Equipment used in the procedure:  
(Medi Supplies)**



**Sterile saline 0.9% IV  
Bag 250ML**



**Introcan safety 3  
cannula**



**Intrafix SafeSet IV Gravity  
Administration Set**



**10ml PosiFlush SP Syringe  
(0.9% Sodium Chloride)**



**Vinyl Non-Steril Gloves, powder  
free**



**5ml Syringes**  
OFFICIAL



**Intrafix Primeline**

Step 1: Mixing the vials from Glutax 75G DCRP 750000  
box



Step 2: Insertion of mix into the 250ml saline bag



Step 3: Administration to the client via IV drip for during  
25-30mins

## Premises details:

Hair Studio, Coventry Road, Birmingham, B26

Premises name and address

A and B Hair & Beauty Limited, Coventry Road, Birmingham, B26 (not correct name for this presentation)

FBO name and address

All training certificates taken with **MAKEUP BAYY THE ACADEMY LTD (awaiting evidence of training)**

Training of operative

Over 5 years in hairstyling and 2 years on administering **Glutathione Infusion**

Experience of operative

Two staff members (including the owner)

Number of staff employed

No risk assessments available on site

# Video of the premises



**Hygiene of the premises found**



**Used equipment placed into recyclable waste**



**Medicine storage location.**





## Glutathione (current regulatory status):

An unlicensed medicine

- If a medical claim is made MHRA would be the regulator

injectable products – no medical claim

- Not MHRA
- Trading standards regulator under General Product Safety Regulations
- Office of Product Safety and Standards say not Trading standards

Product Information

- Whilst UK licensed medicines provide all necessary information relating to dose, contraindications etc, these 'grey' products invariably do not include any information. There is very little information available for glutathione anywhere

Administration qualifications

- There are currently no mandatory qualifications for cosmetic procedures, including IV infusions. Training is 'CPD accredited' and is therefore not a measure of competence.
- The JCCP would not recognise any value in IPHM accreditation where it applies to unregulated healthcare professional training courses

Prescription only medicine (POM)

- Saline is a POM – needs to be prescribed
- person is not a registered prescriber. Bought of the internet – legitimacy of product? MHRA contacted - MHRA would investigate the breach in respect of the Human Medicines Regulation as by dilution with normal saline intravenous infusion, the Glutax infusion becomes a prescription only medicine and this is within their purview - compliance notice served

# Actions: H&S legislation or Part 2a (Health Protection legislation)?



Health and Safety at Work etc. Act 1974, Section 22, 23 and 24

<b>Prohibition Notice</b>	Serial Number WK/011306131
---------------------------	----------------------------

Name: [REDACTED]  
 Address: [REDACTED]  
 Trading as\*: [REDACTED]  
 I: [REDACTED]

Being an Inspector appointed by an instrument in writing made pursuant to Section 19 of the said Act and entitled to issue this notice of Regulation and Enforcement, Birmingham City Council, City Operations Directorate, PO Box 16977, Birmingham B2 2AE

Telephone number: 0 [REDACTED]  
 hereby give you notice that I am of the opinion that the following activity/activities namely:

**Intravenous infusion procedures including the administration of all substances by using relevant equipment on any persons**  
 which are being carried on at: [REDACTED]

Involve a risk of serious personal injury, and that the matters which give rise to the said risks are:

**Injuries from contracting infectious diseases and side effects of chemical infusion**

and that the said matters involve contravention of the following statutory provisions:

**Health and Safety at Work etc. Act 1974. Section 2(1), 3(1), 3(2)**

because

**You have failed to take effective measures to prevent the transmission of infectious diseases associated with the intravenous infusion procedure and fail to undertake appropriate assessment of chemical to be used and the effects of those chemical on any individual.**

and I hereby direct that the said activities shall not be carried on by you or under your control immediately unless the said contraventions and matters have been remedied.

I further direct that the measures specified in the schedule which forms part of this notice shall be taken to remedy the said contraventions or matters.

Signature Date: 27<sup>th</sup> March

This is a relevant notice for the purposes of the Environment and Safety Information Act, 1988 Yes / No  
 This page only will form the register entry\*.

See Notes Overleaf \*delete as appropriate

1. You have failed to take effective measures to prevent the transmission of infectious diseases associated with the intravenous infusion procedure, including but not limited to the following deficiency found:

- Non-sterile disposable gloves were found being used for the procedure**
- Lack of wash hand basin facility within treatment room for effective cleaning and disinfection**
- Lack of understanding, awareness and knowledge of infection control procedures required for the procedure.**
- The structure of some surfaces within the treatment room do not support the effective control of pathogens.**

2. You have failed to undertake an appropriate risk assessment of the chemical to be used and the effects of those chemical on any individual:

- There was found to be an Inadequate and inappropriate risk assessment undertaken and implemented concerning the Glutathione IV infusion therapy**
- There was found to be an Inadequate and inappropriate aftercare assessment was given to customers and the customer in question and, the customer had completed this assessment with information which should have lead to further investigation by yourself as to potential risks associated with the proceeding procedure which you had not undertaken.**
- There was found to be a Lack of traceability for products used in the treatment.**
- There was found to be a Lack of detailed risk assessment for products used the treatment**

3. No evidence has been provided that those undertaking the procedure are suitable trained to perform the activity.

- There was no evidence of suitably qualified persons for the prescribing of Prescription Only Medicine, i.e. Saline solution**
- There was no evidence of suitable training for staff performing venous access.**

# Part 2a (Health Protection regulations) to change behaviours?

## Part 2a?

- There was no direct evidence that the procedure was responsible for the infection in the client however there was evidence around infection risk from the procedure being performed in the salon environment.
  - Could not prove beyond reasonable doubt that the procedure caused the infection – would a JP agree to a Part 2A?
    - Would need swabbing results, testing of the product (who could do this); a witness statement from a consultant from the hospital and an expert on this procedure to attend court to provide evidence
- Feedback would include lack of appropriate IPC measures as evidenced from the environment and initial risk assessment and expertise and information would be provided/offered around the requirements

## 28-day order

- Would have to collate evidence and request an order every 28 days
- Involvement of legal teams – expense, availability, expertise; court time
- Witness statements from officers, CCDC, other experts every 28 days
- Would have to prove a link between the injection and the infection
  - the patient had injected themselves with Mounjaro injection 7.5mg weekly for weight loss - compounding factor?
  - What evidence would require? – swabs?
- What ask in the order?
  - stop operation?

# End result:

- Prohibition notice still in place
  - Unlimited fine at tribunal if found to be undertaking the treatment
- It was clear from speaking with the owner of the property that their comprehension of the potential damage and ill health effects to the patient were not realised
- They continued to not understand infection control procedures nor understand why risk assessments are valid
- BCC EH: A prohibition notice would be served on the proprietor by BCC prohibiting the administration of Glutax by intravenous infusion based on Health and Safety infringements
- UKHSA: Advice sought from the MHRA on the status of the product Glutax and any other concerns around procurement and administration that may fall under the remit of the MHRA/Medicines Act.
- UKHSA : CCDC will follow up with NHS Prof regarding the underlying cause of the TSS and any further information that might be available from microbiology and biochemistry results.
- UKHSA: will look into the supplier, any further information on the product and its administration, whether it might be counterfeit and into supplier of the intravenous infusion equipment and saline.

## strengths

- Transferable skills within existing workforce
- Inspection skills
- Investigating and enforcing skills
- Knowledge of licensing schemes
  
- Licensing sections used to the delivery of licensing schemes/ processes/ IT/ payment systems

## weaknesses

- LA EH have reduced capacity to bring in the new scheme and maintain the licensing regime
- Competing workload priorities using the same staff
- Upfront set up time and costs may not be available if relying on funding from licensing fee
- Training of staff
- Nuances with the different treatments at present unknown
- Will need knowledge of other partners roles
  
- Lack of database of eligible premises
  
- Street walks/ trawl of internet and social media

## threats

- Legislation regime not robust enough to deal with situations in field
- Differing enforcement policies between regulators
- Government policy on enforcement - degree of strength / incentive to comply
- Licensing may force premises into domestic situations to evade licence
- Tattooing and piercing not included in licensable activities - 2 tier system within same premises
- Potential raise in number of complaints
- Duplication of work within some premises depending on treatments provides – ie both LA and CQC regulation

## Opportunities

- Closer partnership working/ better relationships
- Upskilling of staff
- Retention of staff
- Better outcomes for customers of cosmetic treatments
- Some assurance for customers on standards of operators
  
- **Relate to a PH outcome?**

# Questions

