

# Accredited Registers Impact Assessment

**Accredited Register: Save Face**

**Type of Review: Full renewal assessment**

**Period under review: 2023-2024**

**Date Approved for Panel: 23 February 2024**

## Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

### Equalities impacts – summary

Save Face assures that its registrants are equipped to care for a diverse population through their ongoing registration with the statutory regulators. Its overall approach is set out within its [Save Face Equality and Diversity Policy](#) which states:

It is our policy to treat all partners, employees, prospective employees, contractors, clients and suppliers fairly and equally, regardless of their gender, sexual orientation, family status, race, colour, nationality, ethnic or natural origin, religion or belief, age, physical or mental disability, working patterns, responsibility for dependents, membership of the travelling community, union membership status or any other irrelevant factor

During our review, we did not find any evidence of potential negative or adverse impact on any of the protected characteristics as a result of Save Face's policies.

Save Face collect information about different client groups through concerns received from consumers, e.g.:

'In 2020 we received 2,083 complaints from members of the public regarding non-Save Face registrants, 48% of them were from women aged between 18-25. 81% of the complainants found their practitioner on social media in response to cheap deals and time limited offers. This data enables us to develop specific campaigns and public awareness projects to educate this demographic on how to make safer choices when selecting a practitioner.'

We noted some further opportunities to recognise issues affecting different groups who may seek treatment, for example people with body-image dissatisfaction issues based on skin colour. We have issued a Recommendation for Save Face to assure that its competency requirements, and further assurances such as its Essential Curriculum and assured qualifications include competence in caring for a diverse population.

In our upcoming Standard 9 assessment we will further consider how Save Face collect and analyse public data on service user groups with protected characteristics in relation to nonsurgical cosmetic treatments. This will check Save Face's understanding of any potential disparities or barriers that may exist, informing their ongoing efforts to promote equality, diversity, and inclusion in the industry.

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

### Impacts on groups with protected characteristics

#### Age

| Type of impact (positive/neutral/negative) | Group(s) affected | Description  | Actions required | Date identified |
|--|-------------------|--|------------------|-----------------|
| Positive                                   | Under 18s         | <p>Body dissatisfaction is increasing for both teenage boys and girls which may lead them to seek treatment inappropriately<sup>1</sup>.</p> <p>Save Face require registrants to work within their regulators' requirement e.g. GMC Good Medical Practice.</p> <p>Save Face's Standards for Accreditation state that 'Clinicians will not treat anyone under the age of 18 unless CQC registered with appropriate qualifications where the indication is not for cosmetic purposes.'</p> |                  |                 |

<sup>1</sup> <https://committees.parliament.uk/publications/23284/documents/170077/default/>

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

|  |              |  |  |  |
|--|--------------|--|--|--|
|  | Young adults | <p>Save Face campaigned for and promoted 'the Botulinum Toxin and Cosmetic Fillers (Children) Act' made it a criminal offence to administer injectable toxins or a filler by way of injection for a cosmetic purpose to a person under the age of 18 in England.</p> <p>'Evidence – both from the UK and globally – suggests that body dissatisfaction persists into mid and later-life and may even be exacerbated by age-related physiological changes.'<sup>2</sup> Older people could also benefit from the assurances provided by seeing practitioners on an accredited register.</p> <p>Save Face's complaints data has enabled it to develop specific campaigns and public awareness projects to educate this demographic on how to make safer choices when selecting a practitioner.</p> |  |  |
|--|--------------|--|--|--|

<sup>2</sup> <https://committees.parliament.uk/writtenevidence/43155/pdf/>

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
|--|--|--|--|--|

### Disability

| Type of impact (positive/neutral/negative) | Group(s) affected                               | Description   | Actions required | Date identified |
|--|---|---|------------------|-----------------|
| Positive                                   | People with physical and/or mental disabilities | <p>Some research suggests that disabled people are more likely to report body dissatisfaction than individuals without a disability.<sup>3</sup></p> <p>Save Face mitigates risk of people seeking inappropriate treatments through their standards, requirements for consultation, and to refer where necessary.</p> <p>Save Face's Standards for Accreditation require registrants to gain appropriate informed consent, but providing 'patients with quality information from the outset, verbally and in writing'. The consent process must be conducted face to face by the clinician, on an individual basis with</p> |                  |                 |

<sup>3</sup> <https://committees.parliament.uk/writtenevidence/43052/pdf/>

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

|  |  |                      |  |  |
|--|--|----------------------|--|--|
|  |  | appropriate privacy. |  |  |
|--|--|----------------------|--|--|

### Gender reassignment

| Type of impact (positive/neutral/negative) | Group(s) affected                  | Description   | Actions required | Date identified |
|--|------------------------------------|---|------------------|-----------------|
| Positive                                   | Trans and gender reassigned people | <p>'Societal stigma and prejudice often acts to invalidate trans young people's existence, which impacts on their mental health. Body image and societal perceptions of gendered bodies can often negatively impact trans young people, especially those young people that identify outside of the gender binary.<sup>4</sup></p> <p>We suggest it is in the public interest to have registers of practitioners, such as Save Face, who meet appropriate standards of competence, conduct, and business practice.</p> |                  |                 |

<sup>4</sup> <https://committees.parliament.uk/writtenevidence/42770/pdf/>

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

### *Marriage and civil partnership*

| Type of impact (positive/neutral/negative) | Group(s) affected | Description | Actions required | Date identified |
|--|-------------------|-------------|------------------|-----------------|
| None identified.                           |                   |             |                  |                 |

### *Pregnancy and maternity*

| Type of impact (positive/neutral/negative) | Group(s) affected             | Description   | Actions required | Date identified |
|--|-------------------------------|---|------------------|-----------------|
| Positive                                   | Pregnant and postpartum women | <p>There is evidence to suggest having a history of eating disorders is a risk factor for experiencing eating disorders and concerns about their weight during pregnancy<sup>5</sup>.</p> <p>A study found that breastfeeding is of benefit to both the baby and the mother<sup>6</sup>, and exclusive breastfeeding was more likely in pregnant women with a higher body image, while those with body concerns had less intention to breastfeed or initiate breastfeeding.</p> <p>There is a risk that pregnant women and mothers may be vulnerable to</p> |                  |                 |

<sup>55</sup> <https://committees.parliament.uk/writtenevidence/43155/pdf/>

<sup>6</sup> <https://committees.parliament.uk/writtenevidence/41284/pdf/>

## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

|  |  |  |  |  |
|--|--|--|--|--|
|  |  | seeking inappropriate cosmetic interventions, which should be mitigated by appropriate consultations with Save Face practitioners. |  |  |
|--|--|--|--|--|

### Race

| Type of impact (positive/neutral/negative) | Group(s) affected | Description   | Actions required  | Date identified |
|--|-------------------|---|---|-----------------|
| Positive                                   | People of colour  | <p>People seeking cosmetic treatments may be anyone who wishes to improve their body image, or 'how we think and feel about our bodies'. Persistent causes of body image dissatisfaction identified include 'Colourism—discrimination affecting people of colour where lighter coloured skin is viewed as more desirable.'</p> <p>The risk that people seeking inappropriate cosmetic interventions, which should be mitigated by appropriate consultations with Save Face practitioners.</p> | Recommendation issued for Save Face to assure that its competency requirements, and further assurances such as its Essential Curriculum and assured qualifications include competence in caring for a diverse population. | February 2024   |

### Religion or belief



## Accredited Registers Impact Assessment

Accredited Register: Save Face

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 23 February 2024

| Type of impact (positive/neutral/negative) | Group(s) affected | Description | Actions required | Date identified |
|--|-------------------|-------------|------------------|-----------------|
| None identified.                           |                   |             |                  |                 |

### Sex

| Type of impact (positive/neutral/negative) | Group(s) affected | Description | Actions required | Date identified |
|--|-------------------|-------------|------------------|-----------------|
| None identified.                           |                   |             |                  |                 |

### Sexual orientation

| Type of impact (positive/neutral/negative) | Group(s) affected | Description | Actions required | Date identified |
|--|-------------------|-------------|------------------|-----------------|
| None identified.                           | LGBT people       |             |                  |                 |

### Cost and market impacts – summary

Save Face registrants who provide nonsurgical cosmetic interventions work independently, in small independent clinics or as part of larger chain clinics. NHS-funded treatment occurs only in exceptional circumstances.

The market for cosmetic interventions is noted as large, and increasing, for reasons such as societal or personal pressures and inducements. It is unlikely that the Authority's accreditation will impact on peoples' decisions to use these treatments however it could help direct them to choose practitioners belonging to registers that meet our high standards. We noted that the cost of registration would have an impact on practitioners, however choosing such practitioners may reduce incidents of harm, the worst of which may need to be treated within the NHS.

Save Face's Standards for Accreditation require responsible marketing and advertising in line with advertising standards and CAP Codes. signposts people to relevant professional bodies, the Advertising Standards Authority (ASA) and encourages the public to bring any concerns to

## Accredited Registers Impact Assessment

**Accredited Register: Save Face**

**Type of Review: Full renewal assessment**

**Period under review: 2023-2024**

**Date Approved for Panel: 23 February 2024**

---

Save Face for further support. We suggest that ASA guidelines on cosmetic advertisements, use of Quality Mark, and Botox treatments in all forms of promotion should be included. The website should be regularly examined by Save Face to make sure it complies with ASA and CAP rules.

There will also be impacts from recent and proposed legislative changes, for example the Health and Care Act 2022 gives the Government powers to introduce a licensing scheme for practitioners who operate in England. At the time of writing, proposals were still being developed and we will consider any future consultations on implementing such a scheme once published.

Take-up of the Accredited Registers quality mark by high profile providers may provide positive exposure that benefits all practitioners within the programme.

### Social and environmental impacts – summary

Expectations to fit a particular or unrealistic body image can drive people from all parts of society to seek cosmetic interventions. Both surgical and non-surgical cosmetic treatments have a risk of physical harm and may also contribute to or worsen mental health conditions. Greater recognition of registrants on Accredited Registers, who are appropriately trained and meet standards that address such issues, can help reduce risks of such harm.

### Decision

The Panel noted the above when making its decision to renew Accreditation.