



# Health and Safety in Aesthetic Clinics

*Regulation through advice*

# Facts

According to published statistics from the British Beauty Council, the cosmetic and personal care sector supported a total GDP contribution of £24.5 billion and tax contributions of £6.8 billion to HM Treasury in 2022.

The sector mainly comprises small and medium enterprises and the majority of business owners in the industry are women.

**Body Dysmorphia affects an estimated 2% of the UK population.**

*Source - Body Dysmorphia Disorder Foundation*

## Introduction

City of Wolverhampton Council's Environmental Health team would like to bring to your attention to the importance of ensuring that you are operating your cosmetics business in a safe way. This includes following your legal obligations as an employer or self-employed person to prevent injury or harm to others. You are required to follow advice on how to avoid the spread of infection in a clinic when undertaking treatments such as micro-needling, facial dermal fillers, skin boosters and anti-wrinkle injections (Botox).

## What does the law require?

**The Health and Safety at Work etc Act 1974**, requires all employers and self-employed persons to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all their employees and others affected by their work.

**The Management of Health and Safety at Work Regulations 1999**, require you to undertake a risk assessment, assessing the risks to your employees and others.

**The Control of Substances Hazardous to Health (COSHH) Regulations 2002**, require you to prevent or reduce workers' exposure to hazardous substances by identifying what the hazards are, controlling exposure and deciding how to prevent harm to workers' health (risk assessment).

**Workplace (Health, Safety & Welfare) Regulations 1992**, require you to have a wide range of provisions in the workplace, such as ventilation, good lighting, room space, sanitary and welfare provisions, and that you maintain all equipment to make sure it is safe.

**The Environmental Protection Act 1990**, places a duty of care on you to make provision for the safe management of waste to protect human health and the environment.

**The Botulinum Toxin and Cosmetic Fillers (Children) Act 2021**, makes it an offence to inject botulinum toxin (commonly known as 'Botox') or fillers for cosmetic purposes to a person who is under the age of 18 in England. This includes 'making arrangements' for such as appointments by phone or email.

**Human Medicines Regulations 2012**, make it an offence to sell/supply unlicensed medicines including prescription-only medicines. All prescriptions need to be fulfilled by a GPhC registered pharmacy, and any advance stock can only be obtained by doctors, dentists (registered with the GDC), and pharmacists.

## What are the risks?

**Filler blindness** when the product is injected into a small blood vessel on the face, connected to the retinal artery.

**Filler migration** when incorrect injection techniques are applied, including over filling and excessive pressure.

**Fat and skin necrosis** if the product is inadvertently injected into or blocks a blood vessel.

**Transmission of viral, bacterial, and fungal infections from skin contact**, including herpes simplex, and hepatitis B and C through contaminated equipment, open wounds, and cuts.

**Allergic reactions** to ingredients.

## Your checklist and things to consider

**Training, instruction and supervision.** Staff/self-employed workers must be appropriately qualified and trained in their duties. All staff must be instructed on the risks associated with any work activities.

*Complete*    *To Do*

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**Your risk assessment** must take into account any staff whose first language is not English. You need to consider how they will communicate with clients about any risks such as allergies, medical or skin conditions.

*Complete*    *To Do*

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**Consultation** should not be performed on the day of treatment. It should be appropriate and sufficient to ensure that the treatment is suitable. It should identify any risks such as infectious diseases, allergies or any other medical condition or circumstance. Consultations should be securely recorded, and informed consent must be provided detailing the risks and how complications will be managed.

*Complete*    *To Do*

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**Refusal policy.** Have clear guidelines in place for when to decline treatments, which should include considerations such as the patient's physical and mental health. Remember to include age verifications.

*Complete*    *To Do*

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**Prescription-only medicines** must be issued to a named individual client and dispensed via a UK pharmacy. Medicines should be stored in accordance with the manufacturers guidelines and be appropriately labelled in English. Vials must not be shared between clients. Working with an independent, named prescriber is advised.

*Complete*    *To Do*

**Personal Protective Equipment (PPE)** such as a single use apron, and single use gloves may be worn to protect against contact with clients' skin. Latex-Free (Nitrile), powder free gloves and a single use face covering are advised.

*Complete*     *To Do*

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**Sterilisation of equipment, cleaning and disinfection.** Re-useable equipment such as tweezers and any handheld devices, must be single use and sterile where possible, or cleaned and sterilised in between client use to prevent transmission of infections. Use a two stage clean, including warm soapy water, followed by a disinfectant or antibacterial wipe. For handheld devices, use a single use sleeve, followed by an antibacterial wipe between uses. Check the packaging for a single use and sterile symbol.

*Complete*     *To Do*

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**After care** must be provided, to reduce the risk of complications, including infection. After care should be specific to the treatment and provided both verbally and in writing.

*Complete*     *To Do*

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**Salon design.** Walls, floors, doors must be capable of being cleaned easily, with solid flooring rather than carpets. Worktops and couches, etc should have a hard impervious surface such as vinyl. Clinic rooms must be clutter-free at all times.

*Complete*     *To Do*

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**Hand washing facilities** must be adequate and convenient. Your basin(s) should have hot and cold running water and a supply of liquid soap and paper towels.

*Complete*     *To Do*

**Hand sanitiser** is recommended to be used in addition to hand washing, NOT as a replacement.

**Complete**     **To Do**

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**Work surfaces** should be cleaned and sanitised in-between client use using antibacterial wipes or equivalent. Check the product for antibacterial and antiviral compliance.

**Complete**     **To Do**

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**COSHH** requires harmful chemicals to be stored correctly as per the manufacturer's guidelines. Products containing harmful chemicals must be stored upright in a lockable cupboard. Avoid contact with blood and tissue residues, these can be infected.

**Complete**     **To Do**

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**Sharps** containers must be appropriately labelled and be stored at a safe height. Cytotoxic sharps must be disposed of into a purple sharp's container, and any contaminated vacutainers must be placed into the yellow container.

**Complete**     **To Do**

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**Waste disposal produced** in a clinic is mostly not contaminated by human tissue and can be placed into general waste. Waste which is contaminated with blood or other bodily fluids must be stored in a yellow waste bag and fixed peddle operated bin.

**Complete**     **To Do**

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**Unused medicines** or fillers are classified as cytotoxic/cytostatic waste and must be disposed of into purple bins.

**Complete**     **To Do**

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**Laundry** such as clean towels and linen must be used for each client and must be washed at a minimum 60°C between uses.

**Complete**     **To Do**



## More detailed guidance can be found here:

### *Managing risks and risk assessments:*

*Managing risks and risk assessment at work – Overview -HSE*

*COSHH and Beauticians: [www.hse.gov.uk/coshh/industry/beauty.htm](http://www.hse.gov.uk/coshh/industry/beauty.htm)*

### *How to wash your hands:*

*[www.nhs.uk/live-well/best-way-to-wash-your-hands](http://www.nhs.uk/live-well/best-way-to-wash-your-hands)*

### *NHS National Infection Prevention and Control Guide:*

*NHS England » National infection prevention and control manual (NIPCM) for England*

### *Responsible Prescribing:*

*[PrescribingStatementRevisedFinal\\_ARcomments.pdf](#)*

### *Under the age of 18:*

*Botulinum toxin and cosmetic fillers for under 18s: guidance for businesses - GOV.UK*

*Body Dysmorphic Disorder Foundation: Homepage - BDD Foundation*

*Waste: Aesthetics Waste Disposal and Management | Business Waste*

*Licensing, the future of aesthetics: The licensing of non-surgical cosmetic procedures in England - GOV.UK*

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**wolverhampton.gov.uk 01902 551155**



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