

Our Reference: 202500498378 – Documents 1-9

Document 1 : Emails exchanged 18 March – 10 April.

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 10 April 2025 14:33

To: [REDACTED - Names and contact details of 3x DHSC officials withheld – Section 38 (Personal Information)] **Cc:** [REDACTED - Names and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: Catch up - UK Internal Market Act and regulation of non-surgical cosmetic procedures?

Good afternoon all,

We discussed issues with the UK Internal Market Act previously and I indicated we would get in touch if we had any developments in our thinking. We have indeed progressed our thinking, and unfortunately our understanding of the situation is now worse.

[REDACTED – Section 29(1)]

We are currently socialising this understanding with our colleagues and ministers, but wanted to flag to you as early as possible. We would be *delighted* to be told we were wrong even if we ended up feeling somewhat foolish as a result. As such if you have considered any more and have come to a different reading please let me know.

I am not competent to make any claims as to the SG position on UKIMA overall, but it appears that it presents significant delivery challenges to us at this point, and we will probably need to discuss potential remedies etc with each other. I might be in touch in next week or so with a slightly more developed set of thinking, but wanted to share this now we know it is a potentially substantial issue.

Cheers,

[REDACTED - Name and contact details of SG official – Section 38 (Personal Information)]

From: [REDACTED - Names and contact details of DHSC official withheld – Section 38 (Personal Information)]

Sent: 19 March 2025 15:13

To: [REDACTED - Name and contact details of 2x DHSC, 1x SG officials withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Subject: RE: Catch up - UK Internal Market Act and regulation of non-surgical cosmetic procedures?

Hi [REDACTED – Name of SG official – Section 38(1)(b)]

Our Reference: 202500498378 – Documents 1-9

Thanks for your email. We haven't delved too deeply into UKIMA implications at this stage in our work but would be good to check in with you on it and share some thinking. We can do 2-230pm on Tuesday if that still works for you?

Many thanks,



Department
of Health &
Social Care

[REDACTED - Name withheld – Section 38 (Personal Information)]

Professional Standards and International Workforce
Department of Health and Social Care

[REDACTED - Contact details withheld – Section 38 (Personal Information)] Follow us on X [@DHSCgovuk](https://twitter.com/DHSCgovuk)

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 18 March 2025 14:23

To: [REDACTED - Names and contact details of 3x DHSC officials withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Subject: Catch up - UK Internal Market Act and regulation of non-surgical cosmetic procedures?

Good afternoon, [Names withheld – Section 38 (Personal Information)].

I know it's only a few weeks since we caught up but we would value a further catch up to chat, this time, about the UK Internal Market Act (UKIMA) and any potential impact on the work that we are each doing on regulating non-surgical cosmetic procedures. Not sure if you have had to consider UKIMA yet? Are you available during any of the following times?

Thursday (20 March) – 2pm to 3pm

Monday (24 March) - 2pm to 5pm

Tuesday (25 March) - 2pm to 5pm

Kind regards,

[REDACTED - Name withheld – Section 38 (Personal Information)] Healthcare Quality and Improvement Division | Directorate of the Chief Operating Officer | The Scottish

Government

24 March

Our Reference: 202500498378 – Documents 1-9

Document 2 : Email sent on 22 April

From: [REDACTED - Name and contact details of DHSC official withheld – Section 38 (Personal Information)]

Sent: 22 April 2025 15:35

To: [REDACTED - Names and contact details of 10x SG officials withheld – Section 38 (Personal Information)];

Cc: [REDACTED - Names and contact details of 4x DHSC officials withheld – Section 38 (Personal Information)]

Subject: Postponement of tomorrow's call with DBT

Afternoon all

Hope you are well

Just to flag, DBT colleagues have said they need more time to fully consider the questions/issues that have been raised around the UK IM so have requested postponing the call tomorrow. We obviously appreciate the need to clarify the position asap (and share your sense of urgency!). DBT will be in touch in due course to rearrange

Thanks

[Name of DHSC official withheld – Section 38 (Personal Information)]



Department
of Health &
Social Care

[REDACTED - Names withheld – Section 38 (Personal Information)]Prof
International Workforce

Department of Health and Social Care

[REDACTED - Contact details of withheld – Section 38 (Personal Informa

@DHSCgovuk

Our Reference: 202500498378 – Documents 1-9

Document 3 : Email sent between 23 June and 30 July

From: [REDACTED - Name and contact details of DBT officials withheld – Section 38 (Personal Information)]

Sent: 30 July 2025 10:59

To: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of 2 SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Morning [REDACTED - Name of SG official withheld – Section 38 (Personal Information)],

We won't be able to provide any further written thoughts prior to the meeting. Although we've considered your questions in some depth, they've raised some further questions we would need to understand before we could provide any views, including in writing.

Essentially, we would like to know more about how SG intends to approach the regulation/licensing of the various non-surgical cosmetic procedures in question – [REDACTED – Section 28(1)]. I recognise you may not have a definite policy design at this stage, yet it would be helpful if you could discuss as far as you are able tomorrow on that point.

[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[REDACTED - Name withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [REDACTED - Contact details withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 29 July 2025 11:26

To: [REDACTED - Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of 2 SG official withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIMA - Follow up to Thursday Meeting

Hi [REDACTED - Name of DBT official withheld – Section 38 (Personal Information)],

Looking forward to the discussion on Thursday.

Our Reference: 202500498378 – Documents 1-9

Can you confirm that you will provide a response / further thinking in writing, as discussed at the last meeting, ahead of the scheduled meeting on Thursday so we can progress the discussion to implications and next steps at that meeting?

Thanks,

[REDACTED - Name of SG official withheld – Section 38 (Personal Information)]

[REDACTED - Name withheld – Section 38 (Personal Information)] | Healthcare Quality & Improvement Division | Directorate of the Chief Operating Officer | Scottish Government | St Andrew's House, Regent Road, Edinburgh, EH1 3DG | [Contact details withheld – Section 38 (Personal Information)] |

*I use black size 14 font in emails in line with accessibility, it would be great if you could too

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 21 July 2025 11:20

To: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Names and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Morning [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

No worries and yes 1000-1100 on our side would work - I can send an invite around presently.

[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)]



[REDACTED - Name withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [REDACTED - Contact details withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 21 July 2025 09:15

To: [REDACTED - Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Our Reference: 202500498378 – Documents 1-9

Information))

Cc: [REDACTED - Names and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIMA - Follow up to Thursday Meeting

[Name of DBT official withheld – Section 38 (Personal Information)],

Apologies for not coming back to you before the weekend, it looks like either 1000-1100 or 1500-1600 should be workable, with a preference for the morning. Does that work at your end?

Cheers,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38 (PERSONAL INFORMATION)]

From: [REDACTED - Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 17 July 2025 18:24

To: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of 2 SG officials withheld – Section 38 (Personal Information)];

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Afternoon [REDACTED - Name of SG official withheld – Section 38 (Personal Information)],

Just to come back further - I don't think Tuesday 29th would work for us. Do you have a potential date on Thurs 31st?

Best regards,

[REDACTED - Name of DBT withheld – Section 38 (Personal Information)]



[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |
Department for Business and Trade | [REDACTED - Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 16 July 2025 17:35

To: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Our Reference: 202500498378 – Documents 1-9

Cc: [REDACTED - Name and contact details of 2 SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Afternoon [REDACTED - Name of SG official withheld – Section 38 (Personal Information)],

Apologies for not coming back on this sooner - I think the date on Tuesday 29th or Weds 30th would work best, but I'll come back on this tomorrow on the main email chain.

Best regards,

[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [REDACTED - Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 16 July 2025 13:02

To: [REDACTED - Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Cc: [REDACTED - Name and contact details of 2 SG official withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIMA - Follow up to Thursday Meeting

Hi [REDACTED - Name of DBT official withheld – Section 38 (Personal Information)],

It would be appreciated if you could confirm one of the below time options so we can put a hold in diaries ASAP.

Can I also confirm that you'll provide a response/further thinking ahead of our next meeting so we can discuss implications and next steps at that time?

Thank-you,

[REDACTED - Name of SG official withheld – Section 38 (Personal Information)]

[REDACTED - Name of SG official withheld – Section 38 (Personal Information)] |
Healthcare Quality & Improvement Division | Directorate of the Chief

Our Reference: 202500498378 – Documents 1-9

Operating Officer | Scottish Government | St Andrew's House, Regent Road, Edinburgh, EH1 3DG | [REDACTED - Contact details of SG official withheld – Section 38 (Personal Information)]

*I use black size 14 font in emails in line with accessibility, it would be great if you could too

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 10 July 2025 15:42

To: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 9x SG, 3x DHSC, 2x CO and 4x DBT official withheld – Section 38 (Personal Information)];

Subject: RE: NSCPs and UKIMA - Follow up to Thursday Meeting

Hi [Name of DBT official withheld – Section 38 (Personal Information)]

Thanks for confirming you're still reviewing our questions, it'll be helpful to receive your responses when you have them.

Proposed date options for our next meeting:

Thursday, 24th July 15:00-16:00

Monday, 28th July 13:30-14:30

Tuesday, 29th July 11:00-12:00 or 14:00-15:00

Wednesday, 30th July 14:00-15:00

Please let us know which of these will work for you and we'll put a hold in diaries.

Thanks,

[Name of SG official withheld – Section 38 (Personal Information)]

[Name of SG official withheld – Section 38 (Personal Information)] | Healthcare Quality & Improvement Division | Directorate of the Chief Operating Officer | Scottish Government | St Andrew's House, Regent Road, Edinburgh, EH1 3DG | [Contact details of SG official withheld – Section 38 (Personal Information)]

*I use black size 14 font in emails in line with accessibility, it would be great if you could too

From: [Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 10 July 2025 12:48

To: [Names and contact details of 2x SG, 3x DHSC, 2x CO and 4x DBT officials withheld – Section 38 (Personal Information)];

Our Reference: 202500498378 – Documents 1-9

Cc: [Names and contact details of 8x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Afternoon [Name of SG official withheld – Section 38 (Personal Information)],

Just to come back to note that we're still considering the questions you sent over - could you suggest some dates in w/c 28th July to discuss please?

[Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 09 July 2025 08:56

To: [Names and contact details of 1x SG, 4x DBT, 2x CO, 2x DHSC officials withheld – Section 38 (Personal Information)];

Cc: [Names and contact details of 8x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIMA - Follow up to Thursday Meeting

Hello [Name of DBT official withheld – Section 38 (Personal Information)],

We're just picking up this email chain to see if you have an update, or know when you will be able to provide a comment on the points and examples raised below?

It would also be helpful if we could get a date in the diaries for a further meeting before the end of July. Please could you suggest some days and times suitable for you, week commencing 21st July or early in the week of 28th July so we can get time held in diaries.

Thanks,

[Name of SG official withheld – Section 38 (Personal Information)]

[Name of SG official withheld – Section 38 (Personal Information)] | Healthcare Quality & Improvement Division | Directorate of the Chief Operating Officer |

Our Reference: 202500498378 – Documents 1-9

Scottish Government | St Andrew's House, Regent Road, Edinburgh,
EH1 3DG | [Name of SG official withheld – Section 38 (Personal Information)]

*I use black size 14 font in emails in line with accessibility, it would be great if you could too

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 25 June 2025 18:01

To: [Names and contact details of 1x SG, 2x DHSC, 3x DBT, 2x CO officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 9x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIMA - Follow up to Thursday Meeting

Afternoon [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

Just coming back to acknowledge receipt of this prior to responding more fully.

[Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 23 June 2025 09:56

To: [Names and contact details of 4x DBT, 2x CO and 2x DHSC officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 9x SG officials withheld – Section 38 (Personal Information)]

Subject: NSCPs and UKIMA - Follow up to Thursday Meeting

All,

Many thanks for the productive discussion on Thursday. I think we all welcome the assurance that the intent of UKIMA is not to prevent administrations from imposing new training standards, nor to allow any reasonable public health measures to be subverted in the way we have suggested it might be. [REDACT – Section 29(1)].

We agreed to exchange some correspondence on the issue and to meet again in three to four weeks. I would be happy to consider any proposed dates in the weeks commencing 14 or 21 July.

I have set out our questions, and the scenarios discussed below, I apologise for the lengthy email, I would be grateful for your own thoughts in general, as well as answers to our questions where possible. Anything which we cannot adequately deal with in correspondence I'd be happy to discuss when we meet.

Effect of UKIMA and Section 26

I welcome your view that UKIMA isn't likely to be a barrier in the way we describe, and understand that in this you mainly rely on Section 26. We will certainly consider this in more detail, but any detail on your thinking here would help with that (noting that it is for us to take legal advice ourselves).

[REDACTED – Section 30(b)]

Scenarios

As promised I've outlined some scenarios which may help you consider / take a view.

The three key scenarios I'd like you to consider are illustrative with details such as levels of training etc subject to guidance to future decision or guidance. However all are realistic scenarios, and the important details for our purposes shouldn't change:

1. For the undertaking of microneedling we are likely to wish to impose a standard of, [REDACTED – Section 29 (1)(a)] This is a procedure likely to be available under a local authority licence, and as such we propose that a practitioner would apply to a local authority licensing department enclosing evidence of those qualifications, and the granting of that license would be a desk based exercise.
2. For the undertaking of dermal fillers in the face/lips etc we are likely to wish to impose a standard of, [REDACTED – Section 29(1)(a)]. We would propose that Healthcare Improvement Scotland (HIS) would, in inspecting an independent healthcare clinic that was delivering these procedures, ask to see evidence that all the staff who were carrying out that work in the setting being inspected did indeed have a qualification of that level (or higher/equivalent etc).
3. For the undertaking of a procedure such as a cog lift we propose that this must be undertaken by a medical practitioner, dental practitioner, nurse prescriber or pharmacist prescriber. Again, HIS inspectors would consider as part of their inspection that all procedures were indeed being undertaken by an appropriate healthcare professional.

There would be offences relating to all of these procedures, either undertaking a procedure without a licence and/or not in a premises regulated by HIS or undertaking a procedure even in that context without being the appropriate healthcare professional/ having the appropriate training. [REDACTED – Section 30(b)].

You will note that in the first case there is the granting of a licence, but in the second case it would be the responsibility of the business to employ appropriate staff, and this would be enforced through inspections. There is no "gateway" process to recognise a practitioner as appropriate. [REDACTED – Section 30(b)]

Our Reference: 202500498378 – Documents 1-9

[REDACTED- Section 30(b)]. Is it also your understanding that UKIMA may prevent us from effectively restricting procedures on the basis of an existing profession.

[Redacted – Section 28]

Best regards,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38
(PERSONAL INFORMATION)]
Healthcare Quality and Improvement
Scottish Government

Our Reference: 202500498378 – Documents 1-9

Document 4A : Email sent on 4 August

n.b. Attachment to this document is found at Document 4B.

From: [Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 04 August 2025 13:06

To: [Name and contact details of DBT official and SG Official withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 4x DBT, 3x DHSC, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: NSCPs and UKIM

Hello [Name of DBT official withheld – Section 38 (Personal Information)], all,

With thanks to [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)] and SG colleagues, we've drafted this email, and the attachment, to cover three areas:

1. Provide, as requested, further detail on the practical application of proposed SG regulation, with respect to the question of whether it changes the position discussed RE: the effect of UKIMA.
2. Put in writing SGs understanding of the DBT position as outlined in the meeting, noting this may be put to one side if DBT wish to put this into their own words.
3. Provide a note of question raised in the meeting or in previous correspondence.

It may be helpful for DHSC colleagues to confirm if the broad scenarios set out previously, and in the meeting, would be foreseeable scenarios in England in the future.

We would be grateful for confirmation from DBT that our understanding of your position is correct. In turn we (SG) will consider this, and whether we can agree with that interpretation, which may alleviate some of our substantial concerns. We may have follow up questions as we work through this.

We would also be grateful for answers to the questions in the last part of the attachment. These are probably the highest priority questions drawn from the longer lists we have circulated previously.

Can we politely request a response in writing by Friday, 15th Aug., as this would give us time to then consider DBTs views before meeting again in early Sept., as proposed at the meeting?

Our Reference: 202500498378 – Documents 1-9

Thanks,

[Name of SG official withheld – Section 38 (Personal Information)]

[Name of SG official withheld – Section 38 (Personal Information)] | Healthcare Quality & Improvement Division | Directorate of the Chief Operating Officer | Scottish Government | St Andrew's House, Regent Road, Edinburgh, EH1 3DG | [Contact details of DBT official withheld – Section 38 (Personal Information)]

Document 4B : Attachment to Email sent on 4 August (Document 4A)

SG Proposals

SG proposes to legislate to provide requirements in relation to the carrying out of certain procedures. These are as outlined in previous scenarios (and discussed in the meeting) the scenarios are not repeated here, but hopefully this provides further useful information. In outlining these proposals here, I go further than we have publicly committed or described our plans, and we do not intend to provide this level of detail elsewhere until such time as the Bill is introduced to the Scottish Parliament.

Procedures proposed to be placed under a licensing scheme (c.f. Scenario 1)

A licensing scheme will be established under secondary legislation, and it will become an offence under the Civic Government Act 1982 to undertake certain procedures without holding a practitioner licence (with certain exceptions). A practitioner licence will be granted by a local authority, and the local authority will be required to consider the evidence of qualifications held by the applicant (probably with reference to guidance setting out a reasonable standard). These qualifications will be equally obtainable in and out of Scotland.

Procedures proposed to be regulated by the bill (C.f. Scenario's 2 and 3)

A Bill will be taken forward to regulate other procedures, this will include botox, dermal fillers, BBLs etc. These procedures will all be restricted to certain types of settings registered with Healthcare Improvement Scotland(HIS), (again with exceptions) the settings will be independent hospitals, independent clinics and independent medical agencies as defined under the NHS (Scotland) Act 1978, with clinics being the main expected venue. It is already the case that any person providing an independent health care service (e.g. operating a clinic) while it is not registered with HIS is committing an offence under the Act. A clinic is defined in terms of a healthcare professional (doctor, nurse etc.) providing a service – this cuts both ways, a nurse offering a service is required to register with HIS as an independent clinic and you cannot register a clinic unless one of those professionals is in place. [REDACTED – Section 30(b)].

[REDACTED – Section 30(b)].

New profession / skilled occupation

[REDACTED – Section 30(b)].

Summary of meeting/ DBT position

[REDACTED – Section 28(1)].

Remaining questions

[REDACTED – Section 30(b)]

Our Reference: 202500498378 – Documents 1-9

Document 5 : Email sent on 19 August

n.b. this email sent later in a chain including 4A above

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 19 August 2025 15:28

To: [Name and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 4x DBT, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIM

Afternoon [Name of DBT official withheld – Section 38 (Personal Information)],

To follow up on the main chain from separate messages - firstly just to confirm we'll respond to your questions by end August and will come back on 11th Sept at 14.00 as a proposed next meeting time.

As mentioned it would be helpful if you could provide some further information on the five questions below to inform our response. I recognise that (as when we discussed before) you may not be able to provide full information given the current position of policy development. If it would be helpful to discuss this separately, let me know.

[REDACTED - Name of DBT official withheld – Section 38 (Personal Information)]
[REDACTED – Sections 28(1) and 30(b)]



Department for
Business & Trade

[Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |

Department for Business and Trade | [Contact details of DBT official withheld – Section 38 (Personal Information)]

Our Reference: 202500498378 – Documents 1-9

Document 6A : Emails sent 19 to 29 August

n.b. Attachment to email of 29 August is found at Document 6B.

n.b. These email sent later in a chain including 4A and 5 above.

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 29 August 2025 16:03

To: [Name and contact details of DBT official withheld – Section 38 (Personal Information)];

[Name and contact details of 2x SG official withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 4x DBT, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)] **Subject:** RE: NSCPs and UKIM

Afternoon [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

Please find attached the answers to your questions, as [Name of DBT official withheld – Section 38 (Personal Information)] promised below.

Kind regards,

[Name of DBT official withheld – Section 38 (Personal Information)]

[Name of DBT official withheld – Section 38 (Personal Information)] | **Deputy Director,
Devolution and UK Internal Market | TING, Trade Group**

Department for Business and Trade | [Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 22 August 2025 16:17

To: [Name and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Cc: [Name and contact details of 5x DHSC, 5x DBT, 2x CO and 8x SG official withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIM

Afternoon [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

Thank you for these, it's very helpful. We'll come back to you next week in response to your questions. Just to note I'm out next week so [Name of DBT official withheld – Section 38 (Personal Information)] in copy will be your contact in the meantime.

[Name of DBT official withheld – Section 38 (Personal Information)]



[Name of DBT official withheld – Section 38 (Personal Information)] | UK Internal Market |
Department for Business and Trade | [Contact details of DBT official withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 21 August 2025 17:56

To: [Name and contact details of DBT and SG official withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 3x DBT, 2x CO, and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIM

[Name of DBT official withheld – Section 38 (Personal Information)],

Please find some answers below, hopefully these clarify matters, let me know if you have anything further though.

Best,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38 (PERSONAL INFORMATION)]

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 19 August 2025 15:28

To: [Name and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 3x DBT, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIM

Afternoon [Name of SG official withheld – Section 38 (Personal Information)],

To follow up on the main chain from separate messages - firstly just to confirm we'll respond to your questions by end August and will come back on 11th Sept at 14.00 as a proposed next meeting time.

As mentioned it would be helpful if you could provide some further information on the five questions below to inform our response. I recognise that (as when we discussed before) you may not be able to provide full information given the current position of policy development. If it would be helpful to discuss this separately, let me know.

Our Reference: 202500498378 – Documents 1-9

[Name of DBT official withheld – Section 38 (Personal Information)]

[REDACTED – Sections 28(1) and 30(b)]



Department for
Business & Trade

[Name withheld – Section 38 (Personal Information)] | UK
Internal Market |
Department for Business and Trade | [Contact details
withheld – Section 38 (Personal Information)]

Our Reference: 202500498378 – Documents 1-9

Document 6B : Attachment to email of 29 August (Document 6A)

Regulation of Non-Surgical Cosmetic Procedures and the UK Internal Market Act
2020

UK Government Policy Statement

This note reflects the UK Government's initial policy position on the operation of Part 3 UKIMA in relation to the proposals presented. It is for the Scottish Government to satisfy itself as to how UKIMA applies to those proposals, including whether to seek legal advice as it considers appropriate.

[REDACTED – Sections under 29(1) and 30(b)]

Our Reference: 202500498378 – Documents 1-9

Document 7 : Emails of 1 to 12 September

n.b. Email follows chain including emails in Documents 4, 5, and 6.

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 12 September 2025 18:03

To: [Names and contact details of 1x DBT, 1x DHSC, 2x SG and 2x other UKG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 4x DHSC, 4x DBT, 2x CO and 7x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIM

Afternoon [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

Just to come back to say fine with the proposed agenda if DHSC colleagues are also, and will discuss your queries below when we meet.

Have a good weekend,

[Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[Name withheld – Section 38 (Personal Information)] UK
Internal Market | Regulation, Devolution & Investment (REGDI)
Department for Business and Trade | [Contact details
withheld – Section 38 (Personal Information)]

Our Reference: 202500498378 – Documents 1-9

Document 8 : Emails of 1 to 17 September

n.b. Email follows chain including emails in Documents 4, 5, 6 and 7.

From: [Name and contact details of DHSC official withheld – Section 38 (Personal Information)]

Sent: 17 September 2025 11:57

To: [Names and contact details of 1x SG, 3x DHSC officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 3x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIM

Hi [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Thanks for your email

[REDACTED – Section 28 (Likely to prejudice substantially relations between administrations in the UK)]

Look forward to speaking later today

Thanks

[Name of DHSC official withheld – Section 38 (Personal Information)]



Department
of Health &
Social Care

[Name withheld – Section 38 (Personal Information)] [Professional Standards Authority](#)
[Department of Health and Social Care](#)

[Contact details withheld – Section 38 (Personal Information)] [Follow us](#)

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 10 September 2025 20:01

To: [Names and contact details of 3x DHSC officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 3x SG officials withheld – Section 38 (Personal Information)] **Subject:** FW: NSCPs and UKIM

Colleagues,

Just wanted to get in touch on the back of the below to explain why I'm suggesting an update from you.

Our Reference: 202500498378 – Documents 1-9

[REDACTED- Section 28(1)]

I don't want to put you guys on the spot too much, but probably useful for us to have a free way understanding on where everyone currently stands!

Cheers,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38 (PERSONAL INFORMATION)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 10 September 2025 19:55

To: [Names and contact details of 2x DBT and 1x SG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 4x DBT, 5x DHSC, 2x CO and 8x officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIM

Thank you [Name of DBT official withheld – Section 38 (Personal Information)] for the reminder,

I would suggest a three part agenda for next week as follows:

1. UKIMA interpretation:
 - a. Additional questions (below)
 - b. Stocktake of positions
2. Update on SG plans
3. Update on DHSC plans (if DHSC are able to do so)

In respect the first item I am very grateful to you for the policy position paper Suzanne shared. [REDACTED – Section 28(1)]. We are taking close consideration of the explanation you have given and have a few additional questions that I'll pose below which we hope will help us understand your position further. We can talk through next week or cover by correspondence, whichever is easier.

In respect of the second item I can provide an update on our plans for legislation, and the degree to which our consideration of UKIMA has informed that, especially to the extend to which that consideration may be brought into the public domain during parliamentary scrutiny. I'll let DHSC colleagues advise if they are able to bring an update or not.

Questions for agenda item 1 (unless stated these are largely responses to the paper shared)

1. When you say "Part 3 does not apply to professions which do not have a basis in legislation" – do you mean that if new legislation was introduced to professions which previously did not have a legislative basis (either via a regulator which sets legal requirements or otherwise being subject to legal

requirements that are required to practice that profession) then Part 3 would not apply to them? Can you give an example of a voluntary profession which may be affected by this?

2. In terms of your interpretation of section 29, your position is that the definition of “profession” in s 29(8) is to be read with s 29(1) and (2). Can you explain why this shouldn't be read the other way around. i.e. the definition in section 29(8) informs subsection (1) and (2) which use the defined word “profession”? Our understanding is that this would be the usual statutory interpretation.
3. Can you give an example of the types of professions which may be covered by sections 25(3), (4) and (5)?
4. Your interpretation of section 25(5) does not appear to be in line with the [Ex notes](#) which say – “*To the extent that the activities are unregulated in the other part, any UK resident is qualified (subsection (5)).* Are we misinterpreting the Ex notes?
5. In the response to question 3 and grandfathering, you have referred to the key date as the enactment of UKIMA. The text of section 26(2) gives the second condition as applicable if the person has not practised “at any time before being able to seek that ability by way of that process”. The Ex notes state - “*This does not affect the position of any individual who has practised the profession before the process was available (who will still be able to rely on automatic recognition).*” Therefore, does this mean that under section 26(1) and (2) an individual may rely on automatic recognition if they practised a profession at any point until an individual assessment process is established. If this is not the case can you expand further on this and why the date of UKIMA enactment is relevant here?

Best,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38 (PERSONAL INFORMATION)]

From: [Name and contact details of DBT official withheld – Section 38 (Personal Information)]

Sent: 10 September 2025 14:58

To: [Name and contact details of DBT and 2x SG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 4x DBT, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: Re: NSCPs and UKIM

Afternoon [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)],

Our Reference: 202500498378 – Documents 1-9

Just to come back to this - could you let us know if you think you'll have any particular issues you'd like to discuss next Wednesday please?

Best regards,

[Name of DBT official withheld – Section 38 (Personal Information)]



Department for
Business & Trade

[Name withheld – Section 38 (Personal Information)] | UK
Internal Market | Regulation, Devolution & Investment (REGDI)
Department for Business and Trade | [Contact details
withheld – Section 38 (Personal Information)]

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 01 September 2025 11:35

To: [Names and contact details of 2x DBT and 1x SG officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 5x DHSC, 3x DBT, 2x CO and 8x SG officials withheld – Section 38 (Personal Information)]

Subject: RE: NSCPs and UKIM

Many thanks [Name of DBT official withheld – Section 38 (Personal Information)],

Just acknowledging receipt for the time being – I'll be in touch if we have any questions ahead of the planned meeting on 17 Sept.

Best,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38 (PERSONAL INFORMATION)]

Document 9 : Email of 9 October

From: [REDACTED - Name and contact details of SG official withheld – Section 38 (Personal Information)]

Sent: 09 October 2025 10:03

To: [Names and contact details of 3x DHSC officials withheld – Section 38 (Personal Information)]

Cc: [Names and contact details of 2x SG officials withheld – Section 38 (Personal Information)]

Subject: Non Surgical Procedures Bill

Good Morning All,

We are pleased to notify you that the Non-surgical Procedures and Functions of Medical Reviewers (Scotland) Bill has been introduced to Scottish Parliament and [published](#) on its website this morning, 9 October. The following impact assessments have been published on the Scottish Government's website:

- [Business and Regulatory Impact Assessment](#)
- [Equality and Fairer Scotland Duty Impact Assessment](#)
- [Child Rights and Wellbeing Impact Assessment](#)
- [Island Communities Impact Assessment consideration](#)

Please note that 'Functions of Medical Reviewers' part of the title is in relation to changes to the Certification of Death (Scotland) Act 2011 and is a separate part of the Bill and unrelated to non-surgical procedures.

In summary, the Bill:

- requires that certain non-surgical procedures (which were previously in Groups 2 and Group 3) are only provided from "permitted premises" which are independent hospitals registered with Healthcare Improvement Scotland (HIS), independent clinics registered with HIS and where services are provided or managed by a doctor, dentist, nurse or midwife independent prescriber, or pharmacist independent prescriber, or other healthcare settings as specified in the Bill.
- Procedures which are undertaken for or on behalf of the NHS or by another health care provider for the prevention, diagnosis or treatment of an illness are excluded from the Bill.
- Creates an offence of providing a non-surgical procedure to a person under the age of 18 years and a separate offence of providing a non-surgical procedure from somewhere that is not a "permitted premises".
- Provides Healthcare Improvement Scotland with additional appropriate enforcement and inspection powers to regulate non-surgical procedures.

The Bill does not contain provision setting training and qualification standards; restricting certain procedures to healthcare professionals (previously Group 3 procedures); or setting supervision standards (for previously Group 2 procedures). This allows us to focus on the implementation of the provisions that are in the Bill, and allows businesses to adapt to these requirements. It also allows us to continue consideration of these matters and especially the effects of the UK Internal Market Act 2020 (UKIMA) and whether it affects our ability to make such restrictions. The

Our Reference: 202500498378 – Documents 1-9

Bill, however, contains enabling powers to allow the Scottish Ministers to legislate further to deliver the full policy intention once these issues have been considered in more detail.

Separately, the Scottish Government intends to lay an order under the Civic Government (Scotland) Act 1982 establishing a licensing scheme for lower risk (previously referred to as Group 1) procedures that are not included in the Bill this Parliament.

We would be happy to discuss, I am on leave next week, but happy to pick up after that.

Best,

[REDACTED - NAME AND CONTACT DETAILS OF SG OFFICIAL WITHHELD – SECTION 38
(PERSONAL INFORMATION)]

Healthcare Quality and Improvement
Scottish Government