

Last Information & Advice

Regulation, including Buttock Augmentation
East Midlands Councils - 6 February 2025

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[wolverhampton.gov.uk](https://www.wolverhampton.gov.uk)

Content

- Buttock Augmentation - Introduction and background
- Case study examples
- Instructing an expert and stakeholder engagement
- Regulation and use of existing powers
- Officer Training
- Raising awareness and recommendations

Introduction – Setting the scene

- There's a growing prevalence and normalisation of non-surgical cosmetic procedures
- A rise in social media
- Increasing accessibility and affordability of high street providers
- Advancement of technologies and products available
- Growing concerns with high risk and complex procedures
- Lack of current regulation and restrictions
- Unregulated Training

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- Local intelligence-based complaint regarding Semi Permanent Skin Colouring
- Inadequate infection prevention and control procedures identified
- Lack of medical consultation and informed consent
- Poor facilities
- Unaware of legal duties
- Our pro-active approach

Buttock Augmentation via Dermal Filler 'BBL'

- Often referred to as 'Bum Lift', 'Body Contouring', 'Hip Dips'
- Taking place in Aesthetic Clinics, Nail, Hair and Tanning Salons, Hotels, Converted Domestic Rooms, and Nurse Led Premises
- **GMC initial contact – not within their remit**
- **CQC initial contact – currently exempt from scope of registration**
- **NMC initial contact – strong opinion regarding their members**
- Application of high-volume filler or other synthetic material injected into the buttocks (cases of over 1000ml)
- Procedure involves pre injection lidocaine

Buttock Augmentation via Dermal Filler ‘BBL’

- Risks and complications can include:

Pulmonary embolism;

Sepsis;

Deep vein thrombosis;

Fat and Skin necrosis;

Allergic reactions, and

Other skin infections.

Expert opinion and support

- Incident Management Team - UKHSA
- Site audit– Infection Prevention and Control Nurse
- Training manual review
- British Association of Aesthetic Plastic Surgeons (BAAPS) advice:
 - 1. Injection into the subcutaneous plane only – evidence suggest that this significantly reduces mortality related to the procedure***
 - 2. Intraoperative ultrasound must be used – the is the only way that surgeons can be confident that they are not in the muscle layer and that the cannula remains in the subcutaneous layer***

Expert opinion and support

- Dalvi Humzah, Consultant Plastic, Reconstructive and Aesthetic Surgeon
- Medical opinion:
 - Training, expertise, skills and knowledge
 - Consent, including the need for a psychological assessment
 - Contraindications and risks
 - Product Safety, including Prescription only medicines (POMs)
 - Complications, management and emergency care
 - Post operative care
 - Environmental Standards

Regulation – powers available

- **Prohibition Notice:**
 - The Health and Safety at Work etc. Act 1974, **Section (3)**
 - The Management of Health and Safety at Work Regulations 1999, **Regulation 3**
- Botulinum Toxin and Cosmetic Fillers (Children) Act 2021
- The Consumer Protection from Unfair Trading Regulations 2008 – **Section (9)** Stating or otherwise creating the impression that a product can legally be sold when it cannot
- Anti-Social Behaviour – Civil Injunction, Criminal Behaviour Order

Challenges with our investigations

- Resource intense and time consuming
- Officer confidence and competency
- Co-operation - obstruction
- Practitioner – Lack of accountability
- Legislation – fit for purpose
- Obtaining the most appropriate medical expertise and support
- Training providers
- Lack of reporting and public awareness
- **New Guidance for Regulatory Officers** - [Brazilian Butt Lifts \(BBL\) - JCCP](#)

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- Local intelligence-based investigations
 - Extreme Body Modification
 - Facial Fillers
 - Unlicensed Medicines
 - PRP – Platelet Rich Plasma
- 2020 Inquiry into Non-Surgical Cosmetic Procedures
- Stakeholder engagement for better regulation



PRP – Vampire Facial

Platelet Rich Plasma is produced from a person's own blood

Typically performed to improve skin texture, reduce fine lines, blemishes and scars, and to stimulate hair re-growth

The procedure involves:

- Phlebotomy

- Use of a centrifuge

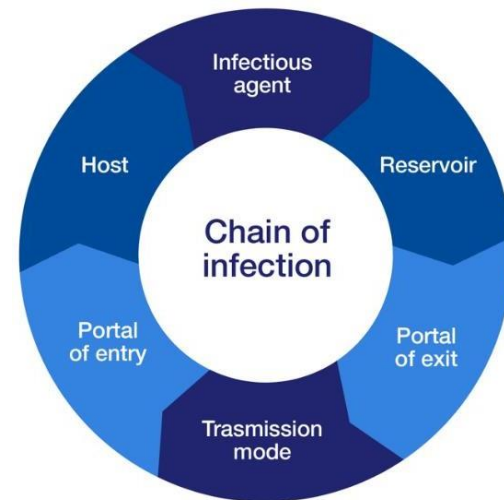
- Microneedling or Injection





Infection transmission

- Do they understand the blood borne virus risk?
- Do they understand how infections can be transmitted?
- How are sharps managed and exposure to blood and bodily fluid?
- What are their needlestick injury procedures?
- What personal protective equipment is available?
- Good cleaning and housekeeping



Vitamin and Botox Botulinum Injections

- Specific brands of botulinum toxin currently licensed for use in the UK, some examples - **Azzalure**, **Bocouture**, and **Botox**
- Products such as **Botulax**, **reNTox** and **Innotox** are not authorised medicines for use in the UK
- Vitamin injections such as AMPAVIT are not authorised for use in the UK
- POMs obtained without a face-to-face consultation
- Practitioners obtaining POMs in their own name and 'Self Prescribing'
- Large volumes of stock held on site and using 'Off Label'



Make a referral to the MHRA: TheBureau@mhra.gov.uk

Regulation – use of existing powers

The Workplace (Health, Safety and Welfare) Regulations 1992

The Provision and Use of Work Equipment Regulations 1998

Public Health (Control of Disease) Act 1984

Health Protection [Part 2a Orders] Regulations 2010

Health Protection (Local Authority Powers) Regulations 2010



Regulation – use of existing powers

The Environmental Protection Act 1990

Protecting Minors:

- The Tattoo of Minors Act 1969
- Botulinum Toxin and Cosmetic Fillers (Children) Act 2021
- Sexual Offences Act 1956



Stakeholder Engagement

- MHRA referral:
 - *Where certain healthcare providers and non-medics are stock holding POMs that have not been dispensed to a named person*
 - *Where POMs are obtained for a named person but are used for someone else*
 - *Where POM's (usually unlicensed, can be fake) have been obtained other than from a UK registered pharmacy*
 - **Yellow Card System** - [Yellow Card | Making medicines and medical devices safer](#)
- Incident Management Team (UKHSA, Public Health, ICB)
- Knowledge Hub 'Skin Piercing & Special Treatment Group'
- JCCP

Raising Awareness & Recommendations

- Social Media Campaigns 'Making better choices'
- Pro-active approach where possible
- Build on your database of practitioners
- Plan ahead
- Improved reporting systems – GP referrals and other healthcare settings

Press Articles:

[Unlicensed anti wrinkle injections put customers at risk of facial disfigurement | City Of Wolverhampton Council](#)

[Warning that illegal use of Vitamin B12 injections puts city customers at risk | City Of Wolverhampton Council](#)

[City council serves notice on business offering non-surgical 'Brazilian Butt Lifts' | City Of Wolverhampton Council](#)

Useful Links and Guidance

[BAAPS statement on Brazilian Buttock Lifts | The British Association of Aesthetic Plastic Surgeons](#)

[baaps document on gluteal lipofilling safety and recommendations final.pdf](#)

National IPC Manual [National infection prevention and control manual for England](#)

Guidelines for Professional Diagnostic Ultrasound Practice in Medical Aesthetics

[JCCP Guidance on Prescribing](#)

Cosmetic Screening Scales (COPS)

Recent Body Modification prosecution - Eunuch Maker - ['Eunuch-maker' mutilator jailed for 22 years - BBC News](#)



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