Healthcare Improvement Scotland

Gyle Square
1 South Gyle Crescent
Edinburgh
EH12 9EB

0131 623 4300

Delta House
50 West Nile Street
Glasgow
G1 2NP

0141 225 6999

Glasgow Office

Date: 29 October 2026
Name: Kevin Freeman-Ferguson
Email: his.ihcregulation@nhs.scot

Ms. Fiona Bradley
94 Church Street
Inverness
IV1 1EP

Dear Ms. Bradley

IMPROVEMENT NOTICE
SECTION 10R NATIONAL HEALTH SERVICE (SCOTLAND) ACT 1978)

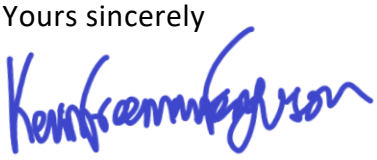
Healthcare Improvement Scotland has concluded that The Face Place, 1 Cromwell Road, Inverness, IV1 1SX is not operating in accordance with requirements or conditions imposed by or under the Act, or the requirements of Regulations made under the Act.

Healthcare Improvement Scotland hereby gives you notice that unless there is a significant improvement in provision of the service, it intends to make a proposal to cancel your registration in terms of section 10S of the Act. The nature of the improvements to be made, and the period within which they must be made, are specified in schedule 1 of this notice

Please also note that where more than one improvement is specified, failure to demonstrate compliance with any one of the improvements within the required timescale may result in the Healthcare Improvement Scotland proceeding to make a proposal to cancel registration.

Please contact me if you would like to discuss this notice, or if there is anything in the notice you do not understand.

Yours sincerely



Kevin Freeman-Ferguson
Head of Regulation

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Schedule 1

1. **By 7 December 2026**, the provider must must develop effective systems that demonstrate the proactive management of risks to patients and staff. This must include:
    a. a comprehensive risk register, and
    b. appropriate risk assessments to protect patients and staff

    This is in order to comply with Regulation 13(2)(a) of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

2. **By 7 December 2026,** the provider must implement effective systems that demonstrate the safe recruitment of staff.

    This is in order to comply with Regulation 8(1) of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

3. By **7 December 2026,** the provider must have practicing privileges contracts that describe the governance procedures in place to ensure safe delivery of care with individual responsibility and accountability clearly identified and agreed.

    This in order to comply with Regulation 8 of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services Regulations 2011)*

4. **By 7 December 2026,** the provider must ensure that all staff are not included on the adults' or children's list of the Protection of Vulnerable Groups (Scotland) Act 2007.

    This is in order to comply with Regulation 9 of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

5. **By 7 December 2026,** the provider must improve the standard of record keeping in patient care records to ensure they contain a record of the outcome of the consultation, assessment and the aftercare advice given to patients by the healthcare professional. All records must be signed, dated and timed by the healthcare professional.

    This is in order to comply with Regulation 4 of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

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6. **By 7 December 2026**, the provider must ensure that each patient consent is obtained to share information with the GP and next of kin in the event of an emergency. If the patient refuses, this should be documented.

   This is in order to comply with Regulation 4 of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

7. **By 7 December 2026,** the provider must ensure that, once reconstituted, the botulinum toxin vial is only used for a single patient, during a single treatment session, and that any unused solution is discarded to comply with the manufacturer's guidance for botulinum toxin.

   This is in order to comply with Regulation 3(d)(iv) of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*

8. **By 7 December 2026,** the provider must ensure that as an independent clinic, any stock of medication or medical devices that it holds must only be administered to individual patients they are assigned to.

   This is in order to comply with Regulation 3(d) of *The Healthcare Improvement Scotland (Requirements as to Independent Health Care Services) Regulations 2011.*