Advice and safe practice for permanent tattooing - guidance for operators

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Introduction (a)

How can this booklet help me?

Tattooing has been with us in many forms throughout history, and influences on modern, Western tattooing methods have come from a diverse range of ethnic groups and from all parts of the world. In recent times tattooing has increased greatly in popularity within Western society, and can no longer be regarded as an art form for the minority. Influences such as specialist body art magazines, TV publicity and the popularity of tattoos within the celebrity community, mean that the number of people requesting tattoos is growing, with all sections of society now providing the client base for a modern tattooing business.

These developments are good news for the industry, but also mean that the planning and preparation that operators need to perform are more important than ever for ensuring safe, well-executed treatments. Client health and safety is obviously a priority, but so is your own (operator) health and safety. This guidance provides information that is relevant for both you and your clients.

The following pages cover important topics that require your attention if you are in the business of tattooing. The subjects covered here are those that your local Environmental Health Officer will ask you about when he or she calls to inspect your premises. By checking and understanding this information you can be sure that you haven’t overlooked anything important. And the result? Well, your business has every chance of being a safe and successful one.
That’s fine, but I’ve been doing this for years – what can a booklet teach me?

For those already in established businesses, there are constant new developments that can affect your work and the way you conduct it. Some examples include:

- New findings related to pigment safety (especially chemical and microbiological quality);
- The emerging methods for chemical and Ruby Laser tattoo removal;
- Recent changes to the law that affect business registration by your local authority; and
- The increasing role of the Internet as a supplier of equipment – It is now easier for inexperienced operators to order equipment online, and outside of the usual business-based training circles. This may result in inexperienced operators, with little background knowledge of tattooing, establishing businesses.

This booklet covers these and many other topics. The information has been designed for use as a reliable guide for the ‘now’, as well as a useful reference for the future, should you need it.

Talking about it

This guidance is designed to be as up to date and informative as possible, but no booklet can ever replace being able to speak to someone knowledgeable in this area. If you have any concerns about tattooing health and safety, do seek help from your local Environmental Health Department, as staff there can act as your main source of advice. Other useful sources of information are provided towards the end of this booklet. Please remember, tattooing businesses in Great Britain require registration, which will involve inspection of your premises at an early stage. Contact your local Environmental Health Department so they can advise you on requirements.
What do I need to do to ensure safe treatment at my premises? (a)

Training - a contentious topic

- Tattooing and body piercing are traditionally taught under informal apprenticeship schemes, usually on a one-to-one basis within established business premises;

- Tattooists consulted in the preparation of this guidance agreed that apprentices should serve with an experienced operator for at least a year before thinking of starting up their own business activities;

- Operator training methods, however, may differ, and the lack of any standardised form of apprenticeship means that variations in training quality are likely across the industry;

- The role of the apprenticeship may also be influenced by the availability of tattooing equipment via the Internet. In theory, anyone – whether trained or untrained – can order equipment on-line and set up business as a tattooist. This may encourage some operators to by-pass any kind of recognised training;

- The Tattooing and Piercing Industry Union (TPI), a GMB-affiliated organisation, was formed in 2004 as a voice for many operators in this field. The TPI has rejected a proposal for a formal college-based platform for tattooing and piercing training, though it acknowledges that poor practice in these industries is unacceptable;

- At the time of writing the TPI has indicated that its members are willing to work together and with others to create consistent standards that will ensure safe, hygienic treatments across the UK. Related discussions are on going, however any new approach to training is likely to take some time to plan and to agree upon; and,

- Although tattooing techniques are not covered by this document, it is recommended that some basic training information be recorded. Areas covered should include first aid, hand hygiene, skin disinfection, the use of autoclaves and decontamination of equipment. Relevant staff training records should be kept on site.

The information in this document is intended as a guide to promote safe, hygienic tattooing, and should therefore not be regarded as a formal training document. Its contents – other than the legal aspects - are not compulsory, but are there to advise you on best practice. The advice and protocols provided here should therefore be regarded as the preferred way of proceeding, for the areas described. Guidance on body piercing is covered within a separate, related document.
What do I need to do to ensure safe treatment at my premises? (b)

What are the basics - my work area and sink?

- All work surfaces, couches, seats, floors, lower wall regions etc should be designed so that they are impervious and so resistant to liquid spills;
- Floors should be slip-resistant and carpets should be avoided in treatment areas;
- A suitable operating bench, couch or adjustable recliner chair with washable surfaces is required;
- A paper roller towel system should be used to cover bench, couch or recliner chair between clients;
- All smooth, impervious surfaces should be cleaned with detergent and disinfected by wiping with a suitable disinfectant between clients. These steps reduce the risk of cross infection;
- Products used for cleaning and disinfection should be chosen with care to be effective but to avoid causing damage to your work surfaces. Before purchasing, check the manufacturer’s catalogue, or with the supplier direct, to ensure the products are suitable for your needs;
- Water for hand washing should be supplied via hot and cold mixer tap, preferably via a foot, elbow or lever operated tap system, and hands should be washed with soap – ideally from a soap dispenser - and dried using good quality disposable paper towels;
- A separate deep sink with hot and cold water should be provided exclusively for washing equipment and instruments and should be located in a separate ‘dirty’ area, away from the clean operating area;
- Alcoholic hand rub (cleanser) should not be used as a substitute for good hand washing and should only be used on hands that are already physically clean;

Cont
**What do I need to do to ensure safe treatment at my premises? (c)**

**What are the basics - my work area and sink?**

- Do ensure the light level where you work is sufficient for your needs. A combination of natural and artificial lighting is ideal;
- Advice on sharps disposal is provided elsewhere in this document, see page 20

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Some businesses are employing air-sanitising equipment to allegedly reduce the risk of airborne contamination in the work place. These instruments often use proven air filtration, ozone, or UV technology – and sometimes a combination of these - to reduce the level of airborne microorganisms in workplace air. The need for such air treatments for any tattooing premises is, however, unproven, since any infection transmission during these treatments is unlikely to be via the airborne route. Performance for these instruments may also vary between manufacturers and they can be expensive; such purchases therefore require careful consideration of specifications, cost and benefit.
What do I need to do to ensure safe treatment at my premises? (d')

I’m bombarded with information on cleaning detergents, disinfectants and sterilants. What do these terms mean?

The cleaning, disinfection and sterilization of equipment or surfaces are essential for making treatments safe. Without these steps, microorganisms such as bacteria, fungi and viruses can cause infection in your clients, or may infect you.

- **Cleaning** is a process that physically removes contamination, including some microorganisms, but does not necessarily destroy all microorganisms, even if a surface looks cleaner. Cleaning of equipment and work surfaces is best done using detergent and warm water. It’s also important to ensure that the product you use will not damage your equipment and work surfaces, as some cleaning products can cause scratching or corrosion of certain surfaces;

- **Ultrasonication** is a liquid-based method of cleaning recommended for some parts of tattooing equipment, particularly the grip and other re-usable, submersible machine parts that are in close contact with the client’s skin. Ultrasonication is performed in a lidded tank and can even clean apertures and recesses. The tank of the ultrasonic cleaner should be cleaned twice a day as a minimum requirement, and kept clean and dry overnight. Further details on this type of machine cleaning are given in Appendix 1.

- **Disinfection** reduces the number of live microorganisms but may not necessarily kill all bacteria, fungi, viruses and spores. Disinfection is therefore not the same as sterilization (next page). Prior cleaning is required before disinfection can be reliable, as any soiling of a surface (e.g. grease, ink, blood) can reduce the effectiveness of the disinfectant. So, for example, disinfection with a non-corrosive disinfectant is recommended for treating coil motor surfaces between clients. This should be performed even if the motor is covered with plastic film during use;
What do I need to do to ensure safe treatment at my premises? (e)

I’m bombarded with information on cleaning detergents, disinfectants and sterilants. What do these terms mean?

- **Sterilization** kills all microorganisms, including bacterial and fungal spores that may survive disinfection treatments. Steam sterilization is the preferred method of sterilizing equipment as it is quick, automated, easy to use, reliable, non-toxic and always effective when used correctly. It is particularly suitable for re-used metal machine sections such as the tip and grip, so long as these parts have been previously cleaned. UV light boxes and glass bead sterilizers are not regarded as adequate for sterilization and should not be used; and

The term ‘sterilant’ is sometimes used by chemical manufacturers to describe chemical products that can kill many harmful microorganisms, including spores. Although a sterilant may be capable, under certain carefully controlled conditions, of producing sterility, real life offers a far greater challenge. Chemicals sold as sterilants should therefore be regarded as disinfectants, with their activity limited to those defined above, under ‘Disinfection’.
What do I need to do to ensure safe treatment at my premises? (f)

Which cleaning, disinfection or sterilizing methods should I use?

The methods you use within your business will depend on the type of equipment you use. Although it is impossible to anticipate every requirement, there are a few principles that should be followed:

- As described for surface cleaning, chemical products used for cleaning and disinfection should be chosen with care, to be effective but to avoid causing chemical damage to your equipment. For example, some metal surfaces may be damaged by disinfectants containing bleach or other corrosive chemicals;

- Before purchasing any chemicals of this kind check the manufacturer’s catalogue/web site, or with the supplier direct, to ensure the products are suitable for your needs and capable of killing bacteria, spores and blood-borne viruses. A selection of cleaning agents and disinfectants, and their appropriate uses, is given in Table 1, page 10;

- Most tattooists own an ultrasonication bath for the effective cleaning of grips and tips prior to steam sterilization. This type of equipment is essential for effective instrument cleaning prior to sterilization and re-use. Ultrasonication generates millions of bubbles that vibrate within the ultrasonication bath of liquid and these facilitate thorough cleaning of even recessed and hollow regions by a process known as ‘cavitation’;
What do I need to do to ensure safe treatment at my premises? (g)

<table>
<thead>
<tr>
<th>Which cleaning, disinfection or sterilizing methods should I use?</th>
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</thead>
<tbody>
<tr>
<td>The methods you use within your business will depend on the type of equipment you use. Although it is impossible to anticipate every requirement, there are a few principles that should be followed:</td>
</tr>
<tr>
<td>- If you use a steam sterilizer for sterilizing hollow metal sections of your machine, e.g. a hollow grip, it must have a vacuum step that will allow penetration of steam into hollow spaces. If not, there is no guarantee that steam treatment will sterilize those areas at all;</td>
</tr>
<tr>
<td>- Although highly effective, vacuum steam sterilizers can be expensive to purchase, run and maintain and are complex pieces of equipment. As such, the suitability of a particular sterilizer for a particular load needs to be checked to ensure sterilization. Further guidance is available in document MHRA-MDA DB 2002 (06) – see Appendix 2 for details;</td>
</tr>
<tr>
<td>- Non-hollow, re-usable items that are heat tolerant can be safely sterilized (once cleaned) using a basic bench-top steam sterilizer, but should not be packaged before sterilizing;</td>
</tr>
<tr>
<td>- Needles used for tattooing are in direct contact with the client's punctured skin. In the past many tattooists cleaned, sterilized and then re-used their needles but today cheap, single-use-only needles of many designs are readily available. As such, needles must only be used once and then disposed of after each client;</td>
</tr>
<tr>
<td>- Many methods are used by operators to clean and prepare their client's skin before treatment. Although 70-80% ethanol wipes will achieve this and will not damage the skin under limited use, thorough washing of the area with soap and water, followed by drying with a clean disposable towel, is sufficient to provide a safe starting point for tattooing.</td>
</tr>
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</table>

Some tattooists are now considering the use of micropigmentation equipment for some smaller tattoos. Micropigmentation instruments may differ totally in design to traditional tattooing instruments, and some require specialist cleaning to ensure safe re-use. Specific details on cleaning procedures required for some micropigmentation machines are described in Appendix 1, and are also available within the Local Authority Circular on micropigmentation, at: http://www.hse.gov.uk/lau/lacs/14-1.htm.
**What do I need to do to ensure safe treatment at my premises? (h)**

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<thead>
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<th>Instruments</th>
<th>Skin</th>
<th>Work surfaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder or liquid detergent diluted in hot water as indicated by the manufacturer – this is a cleaning agent and not a disinfectant</td>
<td>Yes – can be used for initial cleaning of instruments prior to disinfection or steam sterilization</td>
<td>No</td>
<td>Effective for cleaning down surfaces at end of sessions/day, prior to surface disinfection</td>
</tr>
<tr>
<td>Bleach hypochlorite - on application bleach products must contain minimum 1000ppm available chlorine, e.g. from: sodium hypochlorite solution or other source of chlorine such as sodium dichloroisocyanurate (NaDCC) soluble tablets</td>
<td>No</td>
<td>No</td>
<td>Yes (hard, man-made work surfaces). Corrosive - not for jewellery.</td>
</tr>
<tr>
<td>60-80% alcohol available as a component of disinfectant spray or 60-70% alcohol wipes</td>
<td>No</td>
<td>Yes</td>
<td>Yes, but effect is greatly reduced by any soiling</td>
</tr>
<tr>
<td>Halogenated Tertiary Amines or Quaternary Ammonium Compounds (e.g. Trigene); these products may be available as spray, ready to use bulk solution, powder or wipes</td>
<td>Yes – but some products may damage metal surfaces with lengthy exposure</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Chlorhexidine based products – often combined with alcohol, e.g. Hibisol. Sachets should be packed individually to prevent contamination</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Glutaraldehyde-based products such as OmnicideTM</td>
<td>This substance cannot be used on skin and is both an irritant and a potent allergen. Exposure to it is strictly controlled under COSHH. Its use cannot be recommended unless appropriate exposure control measures are in place.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phenolic-based products such as Hycolin, and related products such as Stericol and Clearsol</td>
<td>These products contain 2,4,6-trichlorophenol and/or xyleneol, and these chemicals were not supported under a recent biocides review. As such these products can no longer be supplied or used for any application, and were never appropriate for use on skin **</td>
<td></td>
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</tr>
</tbody>
</table>

**Information source:** [http://www.hse.gov.uk/biosafety/notice/biosn012007.htm](http://www.hse.gov.uk/biosafety/notice/biosn012007.htm)

Additional free information on chemicals and their safe use under COSHH can be found at: [http://www.hse.gov.uk/coshh/](http://www.hse.gov.uk/coshh/)
What do I need to do to ensure safe treatment at my premises? (i)

Do I have to wear disposable gloves or other protective clothing? I have a latex allergy and the gloves irritate my skin

When disposable gloves are worn they provide a two-way barrier that protects both operator and client. A high standard of hygiene and a reduction in operator skin problems can be achieved by following a few basic steps:

- Your hands should be washed and dried thoroughly before putting on disposable gloves. page 13;
- A fresh pair of disposable examination-style gloves must be worn during each tattooing procedure and must be disposed of between clients to avoid cross-infection. Never wash and re-use disposable gloves;
- If you need to temporarily stop work, e.g. to answer a phone, always remove and discard the gloves you are wearing and replace them when you continue working;

- Latex allergies are becoming common with prolonged use of latex gloves, and the use of nitrile or vinyl gloves will avoid sensitisation. Transparent polythene gloves are loose-fitting and easily perforated, so are not suitable for this type of work;

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What do I need to do to ensure safe treatment at my premises? (j)

Do I have to wear disposable gloves or other protective clothing? I have a latex allergy and the gloves irritate my skin

- Ensure the gloves you use are CE-marked for use with ‘biological agents’, and replace them immediately if they ever puncture or tear. This means you are protected against microorganisms if you get used pigment on your gloved hands;

- If latex gloves are worn, those with low protein content should be chosen to help prevent latex allergy.

- Powdered gloves must never be used as they can increase skin irritation and the likelihood of allergy development;

- Always wash your hands after glove removal - gloves are not a replacement for hand washing;

- Moisturising hand cream, applied after hand washing, can help prevent skin drying after frequent washing. Such products should never be relied upon as a physical barrier to protect the skin from infection;

- Further information on latex allergy can be found online at: http://www.hse.gov.uk/latex/about.htm; and,

- Detailed information on skin care and dermatitis in the work place can be found at: http://www.hse.gov.uk/skin/

Some tattooing operators choose to wear dedicated works clothing, and tunic tops that tolerate frequent, high temperature washes are often chosen for this purpose. This approach is fine so long as the top is changed daily to maintain a high standard of operator hygiene. Any other choice of work clothing should be changed daily.

If additional protection is required to prevent contamination of clothing, e.g. from ink or contact with body fluids/blood, then disposable plastic aprons should be considered, and renewed for each new client. These aprons are convenient, inexpensive and do provide an extra barrier of protection for the operator.
What do I need to do to ensure safe treatment at my premises? (k)

Hand washing
an essential part of all hygienic work activity Figure 1

As the operator, your hands should be washed regularly to maintain a high level of personal hygiene. Hand washing is one of the most important procedures for preventing the spread of infection and the first step in infection control.

When to wash hands:

- Before and after direct contact with each client
- After contact with any blood or body fluids
- Before and after using gloves
- After visiting the toilet
- Any point when cross contamination occurs

Hand washing technique as described originally by Ayliffe et al., (1978). J. Clin. Path. 31; 923

1. Wet hands, apply soap and lather palm to palm
2. Clean between fingers; right hand over left and left over right
3. Wash palm to palm with fingers interlaced
4. Wash with backs of fingers to opposing palms, fingers interlocked
5. Clean left thumb with rotational movement of right hand and vice-versa
6. Rotational rubbing of palms; right fingers to left palm and vice-versa
7. After washing, rinse hands under running water and dry thoroughly on paper towels
What do I need to do to ensure safe treatment at my premises? (I)

General housekeeping

- Don’t allow smoking - the new smoke free law that came in on 1st July 2007 applies to virtually all enclosed public places and work places. This includes both permanent structures and temporary ones such as tents. Premises are considered to be enclosed if they have a ceiling and roof and are wholly enclosed either on a temporary or permanent basis. If you require further guidance as to whether your premises are or are not enclosed please contact your local council;

- Do keep your premises clutter free. There is no point investing money in correct equipment, work surfaces and disinfection procedures if your work areas become cluttered with unnecessary mess. Untidiness is more likely to lead to contamination and cross-infection, and it is important to have storage space set aside for the equipment you need. Ideally, this should be an area separate from your treatment area;

- This document is not intended to tell you how to perform your treatment techniques, but as a general principle do ensure that your working area or trolley has a ‘clean’ and ‘dirty’ area – two zones - to ensure that clean and soiled materials are kept separate during each treatment;

- Do display information posters prominently to remind your staff of their responsibility to maintain cleanliness and safe practice at all times – over sinks is a good spot;

- Do display prominently within your premises any certificates relating to approved registration or training you have received;

- For larger businesses, cleaning regimes or rotas are a good way of ensuring that routine jobs are not overlooked, and a useful way for larger businesses to organise this is to have a procedures manual. That way, everyone takes some responsibility and knows what needs to be done, and when; and,

- Practitioners should be trained in first aid and up-dated regularly. The Red Cross and St John Ambulance are examples of organisations which provide training;
Are there any known problem areas with the inks, pigments or the equipment I need to use? (a)

My tattooing machine has mainly re-usable parts but I use one-use-only needles. Doesn’t that remove the risk of cross-infection?

Contamination of tattooing equipment can potentially result from:

- Blood-contaminated pigment tracking back from the client’s skin and up the needle to the inside of the tip and grip;
- Fine droplet contamination inside or outside the equipment; or
- Contact with the contaminated gloves/hands of the operator.

This is why so much emphasis is placed on good cleaning, disinfection and sterilization of your equipment, as described earlier in this booklet. Parts of the equipment that come in to direct contact with the client’s skin (needles, bars and needle tips) must be one-use-only. Any other parts that become contaminated but have to be re-used must be thoroughly cleaned and disinfected. Otherwise, there will be a risk of cross-infection between clients.

A final word on needles: Traditional tattooing needles and needle bars are now widely available by mail order and via the Internet, and costs are low, so use of one-use-only needles is now best practice and affordable. Ordering your needles / bars sterile-packed from a reliable supplier also means that they will be of a consistent quality and so less likely to cause unnecessary skin damage or infection during treatment. Sharps disposal is covered elsewhere in this document (See waste disposal).
Are there any known problem areas with the inks, pigments or the equipment I need to use? (b)

What should I do if I’m still unsure about the safety of my tattooing instrument?

If you have any concerns about the use of your own tattooing instrument, and cannot find the information you need in any accompanying instructions, do contact your supplier directly, or if different, the manufacturer. They may have information that has not been supplied with your machine. If you are not happy with their response contact your local Environmental Health Department for advice. They will be pleased to advise you.

You can also find additional information at http://www.hse.gov.uk/lau/lacs/76-2.htm (for tattooing and body piercing) and at http://www.hse.gov.uk/lau/lacs/14-1.htm (for micropigmentation).

Can I be sure of the quality of the inks and pigments I am using?

Quality control during the manufacture and packaging of pigments and inks is important, because the products are intended for injection into the lower layers of the skin, known as the dermis. This lower skin layer contains blood vessels and nerve endings; so injected material needs to be sterile at first use to prevent infection. Recent analysis of a selection of pigments has been performed by a UK Government laboratory, and has found that:

- Some imported pigments claim to be sterile but may contain high levels of contaminating bacteria and fungi, which cannot be seen;
- Chemical components of some products are sometimes poorly described for individual colours, and testing has found evidence that some product components are incorrectly described in product data sheets;

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Are there any known problem areas with the inks, pigments or the equipment I need to use? (c)

Can I be sure of the quality of the inks and pigments I am using?

- Some colours contain detectable levels of toxic metals, such as copper and nickel. These can cause adverse skin reactions in some individuals, which underlines the importance of asking your client about any known allergies;

- The purity of some henna-based materials may be low. Some recently tested materials have contained little or no henna at all but have contained high levels of para-phenylenediamine (PPD); PPD can cause sensitisation reactions in some individuals; and

- Claims of ‘FDA approval’ or similar scientific endorsements should be treated with caution. They may be misleading – e.g. approved for animals, not people – or at worst, blatantly inaccurate.

In view of the potential for pigment contamination, it is good practice to purchase only those materials that come with a detailed product data sheet, confirming their sterility. An inspector would expect you to have this information available, as a requirement under COSHH, should you be asked about the inks / pigment you use. Unfortunately, even a data sheet may be no guarantee of quality. If you have any concerns about a product’s quality do not test it on yourself or others, but do seek advice from a local public health lab or from your local Environmental Health Officer. Laboratory testing of a particular product may be worthwhile if you plan to use it frequently. Contact details for testing laboratories close to you can be obtained from the Health Protection Agency at: http://www.hpa.org.uk/lars_homepage.htm.
Are there any known problem areas with the inks, pigments or the equipment I need to use? (d)

What is the best way for me to prepare and use my pigments so as to avoid contaminating them?

There are a number of simple ways you can reduce the likelihood of pigment contamination after they are opened, and so make your work safer for your client:

- Assess your product needs with care to avoid ordering too much and having to store bulk amounts that may sit around for months or even years after opening. Although pigments are often cheaper to buy in bulk, once opened, they are more likely to become contaminated with repeated use. Bacteria and fungi from the air are the most likely contaminants;

- Only dispense as much pigment as you need on an individual client basis and never re-use pigment for another client, no matter how expensive a product it is. Dispense it in a clean area;

- Always order your pigments in containers that can be effectively re-sealed after use, either as a screw cap or click-fit lid;

- Never use any product beyond its ‘use by’ date;

- Use only disposable pallets or pots when dispensing or mixing your pigments. Ideally, these should be sterile packed. If not, they should be at least as clean as any other disinfected equipment you are using;

- Do ensure that the pigments you use are appropriate for the treatment undertaken. Technical information should be supplied to you with the product(s) to confirm their suitability for human intra-dermal injection.
Do I need to organise special waste disposal for my business? (a)

Definitions and disposal

Waste that may contain living microorganisms or their toxins, which are known or reliably believed to cause disease in man or other living organisms, are regarded as hazardous wastes. Blood and other body fluids fall in to this category, and may be present on items such as used dressings, towels used for mopping and also on contaminated sharps. The way in which this waste is safely disposed of depends on a number of things:

- The nature of the waste (whether sharps or non-sharps [Soft] Waste);
- The likelihood that it will contain infectious microorganisms – based on a risk assessment and procedures that you plan for your business activities; and,
- The quantity in which the waste is generated.

Further advice on waste handling is provided below, but more detailed information is available online from the Department of Health (DH) at: http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_063274).

If you remain in any doubt about the type of waste you are generating, or the way in which to store and dispose of it, do seek advice from your local Environmental Health Officer.
Do I need to organise special waste disposal for my business? (b)

Sharps Waste

Because your business uses needle-based techniques for treatment it will generate waste material that contains sharps (needles and other sharps items). Used sharps may be contaminated with small amounts of blood or blood products from clients, and because blood can carry serious infections such as hepatitis B and C, as well as HIV, these materials must be disposed of responsibly by an approved contractor.

Sharps are typically classed as clinical waste due to this risk of infection, and are given the hazardous property ‘H9’ in the Recent DH Best Practice Guidance. Details on approved contractors who can safely dispose of such waste are available from your Local Authority. In particular, used needles must be disposed of to containers that prevent any risk of sharps injury.

In order to stay ‘sharps safe’:

- You must dispose of sharps in an approved sharps container, no matter how small your business. This must be done using containers constructed to BS 7320; 1990 / UN 3291, and used containers must be disposed of through a waste management company who will dispose of them safely as waste for incineration only. A contract is required for this service and best practice is for weekly waste collection;
- Don’t try to re-sheath any used needles, should they be supplied sheathed;
- Do avoid risk of injury and discard sharps directly into the sharps container immediately after use and at the point of use. Close the aperture to the sharps container when carrying or if left unsupervised, to prevent spillage or tampering;
- Do not place sharps containers on the floor, window sills or above shoulder height – use wall or trolley brackets, they should be stored above knee level and below shoulder level;
- Do carry sharps containers by the handle - do not hold them close to the body;
- Don’t leave sharps lying around and don’t try to retrieve items from a sharps container;
Do I need to organise special waste disposal for my business? (c)

**Sharps Waste**

- Don’t try to press sharps down in the container to make more room;
- Do lock the container when it is three-quarters full using the closure mechanism;
- Do label sharps containers with premises address prior to disposal;
- Do place any damaged sharps containers inside a larger sharps container - lock and label prior to disposal - do not place this or anything sharp inside a yellow hazardous waste bag as it may cause injury; and,
- Do keep all sharps waste in a designated, locked area until it is collected.

Razors are often necessary for skin preparation prior to tattooing; these should be one-use-only (disposable) and should be discarded to a sharps bin immediately after use. Razors should never be re-sheathed after use.

**Soft Waste**

In addition to the above clinical waste management requirements, used gloves, aprons, swabs, dressings and other non-sharps materials that are contaminated with bodily fluids do require segregation if generated in quantity. This is because such materials are defined as offensive/hygiene waste when generated in quantities of more than 7 kg during any collection interval, and must be disposed of in yellow/black receptacles (‘Tiger bags’). Only when such waste is generated in small quantities (less than 7kg during any collection interval), should it be disposed of in the black bag stream with other waste. All offensive/hygiene waste must be postcode labelled and kept in a designated, locked area until collected.

If your business suffers any kind of infection outbreak, e.g. gastrointestinal disease (diarrhoea and vomiting), then you may need to re-assess the nature of the waste you generate because it may pose a greater risk of infection. A risk assessment and waste disposal procedures should be in place to cope with such an eventuality.
Although excessive bleeding is unlikely during tattoo-related treatments, some bleeding or loss of blood products (oozing) from treated areas may occur and can be safely treated as follows:

- The operator must put on gloves (nitrile or latex – approved for use with biological agents) if not already wearing them;
- Stop any bleeding by applying firm pressure to the wound with a dry sterile dressing;
- Once bleeding stops dispose of soiled dressing into yellow hazardous waste bag; and replace with a sterile, non-adherent dressing; and,
- Remove and dispose of your soiled gloves, then wash your hands.

Always keep a basic first aid kit on your premises, to include sterile gauze, non-adhesive

Ensure you know the correct procedure, should needle-stick injury occur with a used needle, namely:

- Immediately following ANY exposure - whether or not the source is known to pose a risk of infection - the wound or non-intact skin should be washed liberally with soap and water, but without scrubbing;
- Antiseptics and skin washes should not be used - there is no evidence that they help, and their effect on local defences is unknown;
- Free bleeding of puncture wounds should be encouraged gently, but wounds should not be sucked;
- Seek medical advice from your local A&E Department whether your client is a known sufferer of blood-borne disease or not; and,
- Record all such occurrences in your accident book;
- In the unlikely event that a reverse needle-stick injury occurs – e.g. the client is concerned about acquiring blood borne infection from the operator - the operator may be asked to give a blood sample for testing, to confirm an absence of blood borne disease.
I’m all set up now (a)

What about the legal issues?

There are a number of important legal requirements that affect ink / pigment-related treatments, and you must adhere to these to operate legally and safely:

- For both permanent tattooing and micropigmentation treatments you are required to register your activities under Local Government bylaws, enforced by the Local Authority. Your local Environmental Health Department can advise you on these requirements;

- The registration process usually involves an initial visit from an environmental health inspector, who will want to check the suitability of your premises, fittings, equipment and will verify the experience of the persons carrying on the business;

- Businesses are inspected to ensure that they comply with the bylaws, but the inspector is also there to provide you with advice and to answer any questions you might have;

- As a condition of registration, it is possible for you, as a registered tattooist to sometimes visit people, at their request, to tattoo them. Such visits, however, must be made at the person’s request, and this would therefore rule out cold calling;

- Any home visits that you make must not make up the majority of your work, and by legal definition can only be undertaken ‘sometimes’ and not ‘often’. A tattooist who’s main business takes them out of their registered premises for the main part of their working time would therefore be breaking the terms of their registration;

- Legally, the equipment you use for tattooing in peoples’ homes, as well as the working conditions, e.g. a couch for the client to lie on, should match those of your permanent premises. This is to ensure that any hygiene risks associated with mobile tattooing are minimised;

- The Tattooing of Minors Act (1969) prohibits the permanent tattooing of anyone in Great Britain under the age of 18 years. All operators should ask for proof of age before tattooing a client who is not obviously 18 years or older.
I’m all set up now (b)

What about the legal issues?

- Under the Health and Safety at Work Act 1974 (HSWA) anyone carrying on a business must ensure that their staff, clients and members of the public should be protected from risks posed to health and safety by their business. This Act and the associated health and safety regulations, contain wide ranging powers that enable health and safety inspectors to check that your business premises are suitable for the work to be undertaken;

- If you employ people on your premises you must demonstrate that some form of training is given, so that they can do their job safely. In addition, any equipment used in the business must be safe and fit for purpose. This could include equipment such as sanitation equipment, or the tattooing machine(s) used by the business;

- If you are a business that also supplies equipment to others, you must ensure that the machinery and safety components that you supply satisfy essential health and safety requirements and that the machinery is accompanied by instructions for safe use and maintenance;

- Where your business uses chemicals, e.g. disinfectants, which may be harmful (hazardous substances), you must ensure that you do not expose yourself, your employees or clients or other members of the public to these substances. This is also true of infectious agents, so for example, people must be protected against exposure to blood or blood products that may contain blood borne viruses. Safe disposal of swabs, dressings and any sharps is therefore essential, and vaccination against hepatitis B is recommended – see additional advice later in this document;
I’m all set up now (c)

What about the legal issues?

- Lignocaine-based cream or spray and Ametop gel products are only available from a pharmacy and are for medical application only. Their use is subject to strict licensing conditions and use by a non-medically trained practitioner is likely to be an offence under the Medicines Act 1968.

  Under no circumstances should they be administered by injection, as this will breach product licence conditions and will render the products Prescription Only Medicines (POM). In addition,

  - Any creams or gels that can be used legally must be used safely, i.e., in accordance with the manufacturer's instructions or following advice from a pharmacist;

  - They should be applied using sterile gauze, or from one-use-only (mini) packs for each client, to avoid product contamination.

  - Repeated use of some topical local anaesthetics can lead to the development of skin sensitisation.

- Any injected product automatically becomes POM under UK law, and can only be administered by a doctor, dentist, or under certain circumstances, an independent nurse prescriber.

Details of Acts of law and regulations referred to above:

2. Management of Health and Safety at Work Regulations 1999
5. Control of Substances Hazardous to Health Regulations 2002 (COSHH)
6. The Medicines (Sale or Supply) (Miscellaneous Provisions) Regulations 1980
Why so much emphasis on asking a client about their general health before I treat them?

Some of your clients may have known medical conditions that place them at greater risk of complications, should they choose to have tattooing performed. Examples of these include:

- Congenital (i.e. those present from birth) and other heart defects that make it much more likely that any kind of blood infection could cause serious heart complications;
- Clients with known, long-standing diabetic conditions may have reduced skin healing ability due to their condition;
- Some individuals are known to be sensitive (allergic) to certain products, including some disinfectants, latex (gloves) as well as trace metals that may be present in coloured pigments, e.g. Nickel, copper; and
- Anyone with a bleeding or clotting disorder such as haemophilia, or who is taking medication, may heal poorly after even the slightest skin breakage.

In addition to the above, there are known risks to the operator from blood-borne viruses such as HIV and Hepatitis B and C. In view of all these issues a checklist has been provided towards the end of this document (Appendix 3), which lists examples of what you should ask of a potential client before treating them.

It is logical to make your client aware of health related issues at an early stage, and before any treatment is given. A signature can then be obtained that declares their understanding of possible complications associated with certain medical conditions. It is recommended that a prospective client always speak with their GP, should they be suffering from any of the conditions highlighted in Appendix 3. The client signature would also give their consent to a specified treatment. That way your business has proof that you have asked all the right questions and, once satisfied, have gained the client’s confidence and approval for their tattooing treatment to go ahead.

Records containing named clients’ health data are confidential and should be stored in a locked cabinet. The documents in Appendix three gives an example of how such information might be presented and recorded.
Other important considerations prior to treatment

As emphasised at the start of this document, the guidance is not intended as a training manual for tattooing. Consideration of the following points will, however, help to ensure that unnecessary complications are avoided during or after treatment of your client:

**Pre-treatment information** – Do draw your client’s attention to the potential risks associated with tattooing (see Appendix 3) and give the client the aftercare advice sheet. Treatment should only be ever undertaken when both you and the client are happy with the health responses and other conditions listed in Appendix 3.

**Organise your space and plan ahead** - Infection control issues are covered elsewhere in this document, but as a general guide do ensure that your work area is prepared so as to avoid having to leave the client in the middle of a procedure to get something that may be needed. Ensure all items needed for the procedure are within easy reach and that any items not required are removed from the immediate area.

**Positioning your client** - To minimise the consequences of any light-headedness during treatment, your client should be in a secure, supported position when tattooing is carried out.

**Client privacy** - All tattooing must be undertaken in conditions of appropriate privacy.

**Client skin cleanliness** - The client’s skin should be physically clean before any tattooing procedure is carried out, and if dirty the area should initially be washed with soap and water before any marking up. After marking up (below) an alcohol-based skin wipe, preferably from an individually wrapped sachet, should be used to cleanse the skin in accordance with the manufacturer’s guidelines. This must be allowed to dry before the start of a procedure.

**Skin marking up** - If the treatment site is to be marked then this should be done with a fine indelible pen that will not be removed by the alcohol wipe cleansing step, and with the minimum marking possible.
Aftercare advice

It is best practice to supply your clients with written aftercare advice at the time of treatment, rather than verbal advice alone. Some operators prefer to present and discuss this before treatment, others after. The decision should be based on your own experience of when you feel the client is at their most receptive and relaxed. The advice should include:

- Any requirement to keep the treated area covered – this will probably depend on the extent of the treatment and the area affected. A sterile, non-adhesive dressing may be appropriate for larger areas, at least during the client’s journey home, but in many cases, simply keeping the area clean and dry is likely to be the best approach. If cling film is used for larger areas it must be clean (straight from the pack) and your client should be reminded that this is a ‘get home’ covering only;

- Being aware of the signs of any developing infection – although some reddening and localised swelling is likely around any tattooed area, if this persists more than 2 days, or becomes worse within that period, then medical advice should be sought;

- Similarly, if any weeping of the area fails to dry up and scab over within 1 – 2 days, then medical advice should be sought to exclude any chance of local infection;

- The treated area should be kept free from grease, chemicals, general dirt or exposure to biohazards, e.g. handling uncooked meats with newly tattooed hands. Contact with any of these materials could result in contamination of even the smallest of puncture wounds; and

- The use of petroleum jelly based creams is permissible following treatment but should be applied from single use supply or from some other non-communal source. During healing any cream used by clients should be from an appropriate tube/pot at home and hand washing before use is important. A good level of hygiene around the treated area is also essential during healing. Cream can be purchased with advice at a pharmacy or may be available via the tattooist as a specific tattoo wound care product.

Further information, which forms an effective aftercare handout sheet, can be found in Appendix 3 of this document.
What about newer treatments coming on to the market? (a)

Ruby laser tattoo removal

Tattoo removal is something increasingly asked about by clients who are either seeking to change the look of their tattoo, or else wish to remove it altogether. A number of approaches are available, and some are more proven than others:

- Laser therapy is well established for tattoo removal and the process has been medically evaluated and proven effective over many years;
- The pigments are partially broken down by the laser treatment and eventually removed by the body’s immune system;
- Laser removal is generally considered to be a safe procedure, but is still usually performed as a hospital outpatient procedure under a local anaesthetic (which numbs the area immediately around the tattoo), so the client should not feel pain;
- With Ruby-Laser systems, different wavelengths of light are used for different coloured pigments in order to achieve an improved outcome, and a series of treatments is usually needed;
- Although equipment and commercial courses are now available in Ruby-Laser pigment removal, it is worth noting that scarring and incomplete removal can occur following this kind of treatment;
- Laser safety: lasers electronics may run at up to 7000v and have been known to cause fires due to malfunctions. A dry powder fire extinguisher should therefore be kept in any room where a laser is being used;
- The operator of a laser and the client must wear suitable eye protection, and this needs to be correct for the wavelength of the laser being used;
What about newer treatments coming on to the market? (b)

Ruby laser tattoo removal

To protect others the room where the laser is used should have a secure door to prevent accidental exposure by persons coming in. A notice or warning light on the outside of a treatment room door must be used to warn people when they approach, and if possible an interlock should be used; this automatically locks the door when the laser is in use; and,

Useful information on laser safety is available free from the Health Protection Agency at: http://www.hpa.org.uk/radiation/publications/educational/radiation_at_work/lasers.htm or by emailing a request to, information@hpa-rp.org.uk. General health and safety laws apply to the use of any laser equipment in the work place.

Chemical tattoo removal

Alternative, chemical tattoo removal treatments have gained in popularity over recent years, with commercial treatments now marketed in the UK. Some tattooing operators are now being asked about such treatments, but these products have certain characteristics that lend themselves to careful consideration before use.
What about newer treatments coming on to the market? (c)

Chemical tattoo removal

Because a tattooing or micropigmentation instrument is used to insert chemical removal product into the dermal layer of the skin, the whole process requires the same infection control precautions as used for pigment insertion;

The mechanism of action for chemical removal treatments is uncertain, even if successful, and technical information regarding some products is limited. As such, these chemicals should be used with caution and only if their contents are known to be safe and effective;

Do remember that a manufacturer’s description of a product being ‘natural’ or ‘pure’ is no guarantee that it is effective or safe. At least one known tattoo removal product contains lactic acid, which can damage skin and tissue at anything above 10% in solution; and

Registration and enforcement of chemical tattoo removal activities remains an area of uncertainty, and does not fall under current registration conditions. However, under HSWA and COSHH these products must still be used with care and only after any associated risks have been considered and reduced to acceptable levels.
Is there some kind of checklist that I can use? (a)

There seems to be a lot to remember

- Need for contact with Local Authority - for registration purposes;
- Requirement to display registration certificate in premises;
- Records keeping for possible inspection – e.g. client details such as health questionnaires; signed consent forms or other related client records, e.g. photographic;
- COSHH Assessments – For staff levels of more than 4 people, these should detail any risk-related activity, who was involved, and what was done to control or eliminate the risk, e.g. the handling, storage and disposal of strong chemicals or soiled swabs / sharps materials – see also http://www.hse.gov.uk/pubns/guidance/sr12.pdf:
- Evidence of written aftercare advice for clients – see also Appendix 3;
- Training records for yourself and other operators in the business;
- First aid training; posters, booklets, first aid kit availability, spill kit for cleaning up vomit and blood;
- Spill kit for chemical spills, e.g. bleach or other concentrated disinfectant – to include absorbent granules and / or paper tissue roll;
- Operator hepatitis B immunisation – advisable for anyone using needles or in contact with blood products on a regular basis**;
- All individuals handling sharps are advised to ensure they are up-to-date with tetanus vaccination. Your GP will be able tell you whether or not you are fully protected against tetanus;
Is there some kind of checklist that I can use? (b)

There seems to be a lot to remember

- Hygiene measures required, including:
  - Designated wash hand basin for operators only
  - Liquid dispensed soap
  - Hot and cold running water
  - Disposable paper towels and foot operated towel discard bin
  - Procedures for cleaning work surfaces
  - Procedures for cleansing client’s skin
  - Disposable vinyl/nitrile/low protein latex gloves with Microbiological Hazard Group 2 CE marking (latex gloves should be avoided as they are associated with latex allergy)
  - Disposable plastic apron or washable tunic, as appropriate
  - Disposable paper sheets for treatment couch
  - No smoking sign
  - Needles: Pre-sterilized, one use only needles / tubes / tips

- Types of topical anaesthetics – ensure they are licensed for your use and preferably available in one-use-only packs;

- Sharps box use – different sizes are available depending on your needs and are delivered and disposed of by licensed contractor;

- Ensure hazardous waste disposal by licensed contractor;

- Ensure you know the correct procedure, should needle-stick injury occur with a used needle;

- Tattooing equipment choice - consider ease of cleaning and safe re-use;

- Work surface – type / ability to clean; e.g. ensure floors are well sealed;

Guidance for operators / Permanent Tattooing
Is there some kind of checklist that I can use? (c)

There seems to be a lot to remember

- Ultrasonic tank – different tank sizes are available for instrument cleaning;
- Frequency of ultrasonic bath solution changes – type / suitability;
- Disinfectants used – check type and appropriate biocidal activity;
- Autoclave sterilization procedures / records sheet / maintenance records;
- Autoclave performance test certificate and compliance with Pressure Systems Safety Regulations 2000. The owner of the autoclave is responsible for ensuring that:
  - The machine is certified as suitable by a competent person
  - The machine is properly maintained and in a good state of repair
  - Installation and validation of the autoclave is done via an authorised person
  - Training of the operator occurs and is documented
  - A written scheme of examination is available for the autoclave – this record may be examined by any visiting Environmental Health Officer and must include: evidence of daily, weekly, quarterly and yearly testing, completed and documented in a logbook and with each cycle recorded
  - A pressure testing certificate is available (the door can blow off with fatal consequences)

Further detailed information is available from the MHRA on-line guidance link in Appendix 2

- Public liability insurance - not a legal requirement, but makes sense for anyone who has a business or who might otherwise incur liability to obtain Public Liability Insurance cover to simplify matters in the event of an aggrieved client making a claim. NB. using any equipment inappropriately may invalidate cover, for example, using an ear-piercing gun to pierce other body parts.

**A safe and effective vaccine for the prevention of hepatitis B is available. Vaccination is strongly advised for all tattooists and for staff who may be involved in cleaning skin penetration instruments and equipment. There are currently no vaccines available against hepatitis C or HIV. However, there are measures that can be taken post-exposure to blood or body fluids that may prevent infection.
Appendix 1 (a)

Cleaning method recommended for some micropigmentation instruments

As a tattooist you are already likely to own an ultrasonication bath, which can be used for cleaning equipment such as grips, tips and forceps prior to steam sterilization.

Discussion with tattooists has indicated that some are considering limited use of micropigmentation instruments to broaden the services they offer. Many micropigmentation machines require regular cleaning by ultrasonication, followed by disinfection, because their design means that certain re-used parts can become contaminated. As these parts are often heat sensitive they cannot be steam sterilized.

The following 5-stage disinfection method was developed for use on the re-used parts of micropigmentation instruments, e.g. the sealed face of the motor housing. Used needles, needle covers, needle bars and any other disposable parts should be one-use-only and disposed of safely after each client.

1. Any non-replacement part of the equipment that has or may have become contaminated, must be partially submerged, i.e. to cover all contaminated regions, in an ultrasonic bath containing an appropriate ultrasonic cleaning solution.
2. The cleaning solution should be made up and used in accordance with the manufacturers instructions.
3. The equipment must be rinsed in clean water following ultrasonic cleaning.
4. The equipment must then be immersed in a disinfectant*. It is important that the following are considered when carrying out disinfection procedures:

Cont ➔
Appendix 1 (b)

Cleaning method recommended for some micropigmentation instruments

- Parts should be immersed for the correct contact time; the manufacturer of the disinfectant will recommend this time;
- Affected parts should be fully covered in the disinfectant; and
- The disinfectant must be fresh and used at the correct concentration.

Finally, the equipment must again be adequately rinsed in clean water to remove all chemical residues and then dried using a clean, single use, disposable paper towel.

The tank of the ultrasonic cleaner should be cleaned at the end of each day as a minimum requirement, and kept clean and dry overnight.

The above information and further details on hygiene in micropigmentation can be found at: http://www.hse.gov.uk/lau/lacs/14-1.htm.

*NB. The chosen disinfectant must be capable of killing bacteria and blood borne viruses, including hepatitis B, hepatitis C, and HIV. Further independent advice is available from the Health Protection Agency at: www.hpa.org.uk
Appendix 2

Other useful sources of information

- American Academy of Micropigmentation, at: http://www.micropigmentation.org/
- Body art, cosmetic therapies and other special treatments: Barbour Index: CIEH: ISBN 1-902423-80-1 (Price, £20 at the time of this publication)
- HSE Local Authority Circular (LAC); detailed guidance on Cosmetic piercing tattooing and scarification (LAC 76-2). Available at http://www.hse.gov.uk/lau/lacs/76-2.htm
- HSE Local Authority Circular (LAC); detailed guidance on micropigmentation (LAC 14-1). Available at http://www.hse.gov.uk/lau/lacs/14-1.htm
- HSE online guidance on alternatives to latex gloves due to the high incidence of allergy reported by wearers. http://www.hse.gov.uk/latex/about.htm
- The Tattooing and Piercing Industry Union (TPI), in association with the GMB. At: http://www.tpi.org.uk/

N.B. Trade journals, industry seminars, trade conventions and Internet web sites can all be a valuable source of information for your business, but standards of publication and presentation may vary. If you read or hear about anything from such sources that you are uncertain of, please consult your local Environmental Health Officer for advice.
## Appendix 3
### Health questionnaire checklist (a)

<table>
<thead>
<tr>
<th>Prompt for operator – aspects of a client’s medical history that you must check</th>
</tr>
</thead>
<tbody>
<tr>
<td>The medical prompts and client information sheet below are designed to obtain medical information fairly, non-invasively and to only collect relevant and accurate information needed to safeguard against any adverse effect from the proposed tattooing. Once you have provided your prospective client with combined health information / questionnaire (shown in the section below), and they have read it carefully, you need to check whether they have a medical history of any of the following conditions before they sign a declaration form. The client questionnaire is designed to allow discussion if any condition is revealed that may be affected by the tattooing:</td>
</tr>
</tbody>
</table>

### Skin Conditions
- **Eczema** as this may make a person more prone to skin infections / irritation
- **Psoriasis** and other chronic skin conditions at the proposed site of the treatment - e.g. lesions from Koebner phenomenon - but excluding acne and disorders of pigmentation – same complications as eczema

### Circulation disorders
- **Heart disorders** individuals are more prone to serious heart complications from any blood infections
- **High/low blood pressure** can cause light headedness and may be linked to other heart-circulation disorders
- **Haemophilia** and other bleeding disorders – due to poor clotting / healing

### Pregnancy
- **Nursing mothers** ensure that treatment area does not interfere with the feeding process; also, any risk of infection for them is also a potential risk to their baby
- **Pregnancy** the immune response may be affected by pregnancy; any infection may affect the unborn child

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**Guidance for operators / Permanent Tattooing**
Appendix 3. Health questionnaire checklist (b)

Prompt for operator – aspects of a client’s medical history that you must check

Other medical conditions
- **Epilepsy** medication may cause side effects and poor control of the condition may result in fitting during treatment
- **Diabetes** long term sufferers may have circulation problems that can reduce healing properties of the skin; this can result in severe infection
- **Autoimmune disease** or other conditions or treatments causing immuno-deficiency (e.g. cancer treatments) – more prone to serious infection; HIV a risk factor for operator
- **Medication** side effects may affect healing and recovery from treatment

Allergic responses
- **Allergies*** especially nickel allergy; may result in serious skin reaction from small amounts of metals if present in applied products (inks etc.)

Other considerations before you treat a client
- **General observation** treatment should never be undertaken if the client appears to be under the influence of drugs or alcohol
- **Any other conditions**; always ask as the above list is not exhaustive
Appendix 3. Health questionnaire checklist (c)

Prompt for operator – aspects of a client’s medical history that you must check

Note: Tattooing of clients with any of the above conditions is not necessarily impossible. Before any treatment is given, however, affected individuals should be encouraged to consult their doctor for advice as to whether or not there are any contra-indications to having a tattoo.

* Patch testing of skin products may be needed if sensitivities are indicated.

- Associated hazards and risks, e.g. is the client suffering from any infections that may pose a risk to themselves or to the operator as a result of the treatment?

- Please remember, information provided by the prospective client may be unreliable and standard precautions should always be in place to protect both parties, regardless of the response. If a client is suffering from a serious and incurable infection, such as a blood borne-virus infection, it may be inappropriate for them to have treatment undertaken.

UNDER THE DATA PROTECTION ACT (1998) ANY INFORMATION OF A SENSITIVE OR PERSONAL NATURE THAT YOU REQUEST FROM YOUR CLIENT MUST BE STORED SECURELY AFTERWARDS, UNDER LOCK AND KEY. THE INFORMATION MUST NOT BE USED FOR ANY PURPOSE OTHER THAN THAT FIRST INDICATED TO THE CLIENT (I.E. ONLY FOR PURPOSES OF ENSURING THAT TATTOOING IS A SAFE OPTION FOR THEM, AND THAT ANY RISK TO THEM IS MINIMISED BY ASSESSING THEIR MEDICAL HISTORY).

YOU MUST MAKE SURE THAT YOUR CLIENTknows WHO IS OBTAINING THE DATA, FOR WHAT PURPOSE AND FOR HOW LONG THE INFORMATION WILL BE KEPT. IT IS SUGGESTED THAT ANY COLLECTED MEDICAL INFORMATION BE STORED FOR AT LEAST ONE YEAR FROM THE DATE OF TREATMENT, BUT PLEASE CHECK THIS WITH YOUR LOCAL ENVIRONMENTAL HEALTH OFFICER, AS REQUIREMENTS MAY VARY IN DIFFERENT AREAS.
Client health information and declaration of understanding

You have requested a tattoo treatment that involves minor breakage of the skin surface with a needle, and this process may complicate some medical conditions. Please read the following information carefully, and if any of these conditions apply to you, you MUST declare them to the tattooist on the premises and discuss these matters with him/her.

Skin conditions
- Eczema: this may make a person more prone to skin infections/irritation
- Psoriasis: or other chronic skin conditions, excluding acne and disorders of pigmentation – same complications as eczema

Circulatory disorders
- Heart disorders: some heart defects render individuals more prone to serious heart complications from any blood infections
- High/low blood pressure: can cause light headedness and may be linked to other heart-circulation disorders
- Haemophilia: and other bleeding disorders – as may result in poor clotting/healing

Pregnancy
- Nursing mothers: treatment must not interfere with the feeding process; also, any risk of infection for them is also a potential risk to their baby
- Pregnancy: the immune response may be affected by pregnancy; any infection may affect the unborn child

Other medical conditions
- Epilepsy: medication may cause side effects and poor control of the condition may result in fitting during treatment
- Diabetes: long term sufferers may have circulation problems that can reduce healing properties of the skin; this can result in severe infection
- Autoimmune disease: or other conditions or treatments causing immuno-deficiency (e.g. cancer treatments) – more prone to serious infection; HIV a risk factor for operator
- Medication: side effects may affect healing and recovery from treatment

Allergic responses
- Allergies: especially nickel allergy; may result in serious skin reaction from small amounts of metal sometimes present in applied products (inks etc.)

Other considerations before you undergo treatment
- General: treatment cannot be undertaken if you are under the influence of drugs or alcohol
- Any other conditions: the above list is not exhaustive. If you are suffering from any other medical condition not listed, please inform your operator

I confirm that I have read the above information and discussed it with my operator.

Print client’s name: ____________________________
Signature of Client: ____________________________ Date: ______________
Signature of Operator: ____________________________

Was treatment refused by the operator? Yes / No (Circle as appropriate)

Reasons? ____________________________
# Client consent form

## Sample page

<table>
<thead>
<tr>
<th>Name of Premises:</th>
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<tbody>
<tr>
<td>Address &amp; Tel. No. of Premises:</td>
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<table>
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<tr>
<th>Name of Operator (print):</th>
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<tr>
<td>Name of Client (print):</td>
</tr>
<tr>
<td>Address &amp; Tel. No. of client (print):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Age of client and DOB:</th>
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<table>
<thead>
<tr>
<th>Proof of age of client and type of ID used</th>
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<tbody>
<tr>
<td>(attach copy if possible)</td>
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<table>
<thead>
<tr>
<th>Name of Premises:</th>
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<tbody>
<tr>
<td>Please give a short description</td>
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</table>

| Site of Procedure ( & design if applicable) |

## FOR CLIENT’S INFORMATION

**Known (potential) risks associated with tattooing**
- Scarring
- Blood poisoning (Septicaemia)
- Localised infection
- Allergic reactions to pigment
- Localised swelling around the site

## INDIVIDUAL CONSENT

'I declare that I give my full consent to the tattooing being carried out by the aforementioned practitioner. I confirm that potential complications, e.g. infection and swelling, for the procedure undertaken, and aftercare instructions have been explained to me. A written aftercare advice sheet containing more detailed information has been given to me and I agree that it is my responsibility to read this and follow the instructions on it, until the site has healed.

I confirm that the above information provided by me for this consent form is correct to the best of my knowledge, that I am over the age of consent for this procedure (i.e. 18 years old for tattoos) and that I am not currently under the influence of alcohol or drugs.'

<table>
<thead>
<tr>
<th>Signature of Client:</th>
<th>Date:</th>
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<table>
<thead>
<tr>
<th>Signature of Operator:</th>
<th>Date:</th>
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</table>

<table>
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<tr>
<th>Appropriate aftercare advice given?</th>
<th>YES*</th>
<th>NO*</th>
</tr>
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<tbody>
<tr>
<td>Please circle as appropriate</td>
<td></td>
<td></td>
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</table>

GP name and address details (PRINT):

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Guidance for operators / Permanent Tattooing
This advice sheet is given as your written reminder of the advised aftercare for your new tattoo. Getting a new tattoo involves breaking the skin surface so there is always a potential risk for infection to occur afterwards. Your tattoo should be treated as a wound initially and it is important that this advice is followed so that the infection risk can be minimised.

**Minimising infection risk guidance tips:**

- Avoid unnecessary touching, scratching or picking of the new tattoo site to reduce the risk of introducing infection;
- Always wash and dry your hands before and after handling a new tattoo site;
- Your new tattoo will consist of an area of tiny skin breaks, caused by the tattooing needles, so it should be kept covered afterwards for at least an hour using the sterile, non-adherent dressing, applied by your practitioner. This dressing is only intended to get you home without the treated area catching on clothing, or being exposed to the air. The dressing will also help to stop any bleeding / fluid oozing, but should be removed before it dries on to the treated area;
- After removal of that dressing, gently wash the tattoo site with warm tap water and *pat dry* with a clean hand towel or tissue. Do not rub or skin will become irritated;
- If possible, shower rather than bathe whilst the tattoo is healing so that unnecessary water exposure is prevented;
- Do not use skin products on the treated area that have not been recommended by your operator or are not intended for open wound healing. You may apply moisturising cream 2-3 times a day to assist healing and prevent skin cracking, but avoid petroleum based creams as they may affect the colour of the treated area. There is generally no need to use any other skin creams/ antiseptic products and you should not share skin products with others;
- After approximately two weeks, any scabbing should have gone and been replaced with new, intact skin. The area should be completely healed in a further 10-14 days;
- Avoid swimming, sun beds and sun bathing until your new tattoo is fully healed, as direct sunlight / chlorine can interact with tattoo dye pigments causing skin irritation and inflammation;
- Try to wear loose, cotton clothing to minimise rubbing and irritation to a new tattoo site;
- Always keep a new tattoo covered and protected if working in a dirty/ dusty/ oily environment; and
- If you have any problems/ queries, contact your practitioner initially. He/she will refer you onto your GP if there are signs of adverse reaction / infection.

Based on guidance compiled by the MSW Collaborative Special Treatment Working Group - July 2002 – format reproduced with permission from the City of York Council
HSL would like to thank the following for the use of imagery:

Black Patterns & Buddha Hand - Stewart Robson
Head - Dragon Tattoo
Neck & Colour arm - Q's Tattoos

Designed and produced by Visual Presentation Services, HSL

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