

Regulation of Non-Surgical Cosmetic Procedures in Scotland: GMC Response

Thank you for inviting the GMC to contribute to the consultation on the regulation of non-surgical cosmetic procedures in Scotland.

Our guidance

The GMC is the regulator for the medical profession in the UK. As part of our role to promote and protect patient safety, we publish guidance for doctors setting out the principles of good practice and the standards expected of them in the course of their work. All doctors must be aware of and follow the guidance, and we have powers to act if those standards are not met.

The core professional standards expected of all doctors are set out in [Good medical practice](#), which covers fundamental aspects of a doctor's role, including working in partnership with patients and treating them with respect. We also provide detailed guidance on ethical principles that most doctors will use every day, such as consent and confidentiality, and specific guidance on a range of areas, including for [doctors who offer cosmetic interventions](#).

You have asked whether further regulation of non-surgical cosmetic procedures is needed and to this end, whether pharmacists and non-healthcare professionals who carry out such activities should be subject to statutory regulation. We do not regulate either of these groups – pharmacists are of course already subject to statutory regulation – so we have not taken a corporate view on whether statutory regulation of individual practitioners is necessary in this instance.

That said, we advise doctors that, when they delegate an aspect of care (for example, the administration of prescription-only injectable cosmetics), they must make sure that the person to whom they are delegating has the appropriate knowledge, skills and training to do so and is appropriately supervised (paragraph 42 of the cosmetic practice guidance). We support, in principle, measures that assist doctors in meeting their professional responsibilities in this area.

There are already some voluntary measures in place. As you will be aware, the [Joint Council for Cosmetic Practitioners](#) (JCCP) is a recognised self-regulator of the non-surgical aesthetic industry in all four countries of the UK. It acts as a point of access for the public

seeking information about this area of practice and, where appropriate, for raising issues of concern about practitioners. The JCCP places public protection and patient safety as the focus of its activities and maintains both a practitioners' register and a register of approved training providers. Alongside this sits the [Cosmetic Practice Standards Authority](#) (CPSA), which has a role in safeguarding patients who are undergoing non-surgical cosmetic procedures, and these organisations have developed a joint code of practice based on our guidance for doctors but updated so as to be applicable to all aesthetic practitioners.

Healthcare Improvement Scotland's regulation of premises where pharmacists provide aesthetic services would clearly provide a degree of additional confidence to doctors who prescribe cosmetic treatments for pharmacists to administer (although we recognise that some pharmacists are also prescribers) that the premises are hygienic and fit for purpose.

GMC-regulated credentials

As part of our role to improve medical education and practice, we also set standards for medical training organisations, and carry out quality assurance activities to ensure these standards are being met. We are now introducing a new [framework for GMC-regulated credentials](#). These will formally recognise doctors' expertise in specific areas of practice where consistent clinical standards recognised across the UK are necessary to support better and safer patient care.

As a first phase of implementation we are testing five early adopters through our approvals process. This includes a credential in cosmetic surgery, being developed by the Royal College of Surgeons of England. The credential is based on their certification scheme to recognise surgeons who have the appropriate training, qualifications and experience to perform cosmetic surgery. Doctors who gain a credential will be recognised on the published List of Registered Medical Practitioners, providing assurance to employers, patients and the public that a doctor is safe to practise in the area of the credential.

While we do not regulate training in non-surgical cosmetic interventions, we support other organisations who are developing training and standards in this area by sharing progress and encouraging alignment to our standards where possible.

Further information

We hope this information has been useful as you consider the important topics raised in the consultation. If we can be of further assistance to your consideration, please don't hesitate to contact us at gmcscotland@gmc-uk.org.