

Response ID ANON-W21S-ZJ6E-C

Submitted to Regulation of non-surgical cosmetic procedures
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Questions about the grouping of procedures

1 Proposed Group 1 procedures

Group 1 Procedures - Microneedling:

Group 1 Procedures - Chemical peels that only affect the outermost level of skin:

Group 1 Procedures - IPL/LED therapy:

Group 1 Procedures - Use of lasers for tattoo removal:

Group 1 Procedures - Laser hair removal:

2 Proposed Group 2 procedures

Group 2 procedures - Mesotherapy (injection of certain drugs, or other products into the middle layer of the skin):

Group 2 procedures - Injections of toxins (e.g. Botox®) for cosmetic purposes:

Group 2 procedures - Injections of drugs for cosmetic purposes:

Group 2 procedures - Injections of semi permanent dermal fillers in small quantities (<2ml - e.g. to reduce wrinkles, or plump lips):

Group 2 procedures - Any other injections of a product, even if it is not a drug or toxin, for lifestyle or cosmetic purposes. (not including tattooing which is already licenced):

Group 2 procedures - Medium depth peels (that penetrate and destroy the outer layer of skin fully and penetrate into the next layer or upper dermis):

Group 2 procedures - Photo rejuvenation:

Group 2 procedures - Radiofrequency treatments:

Group 2 procedures - HIFU (high frequency ultrasound):

Group 2 procedures - Cryolipolysis (the use of cold to destroy pockets of fat under the skin):

3 Proposed Group 3 Procedures

Group 3 procedures - Platelet rich plasma, biotherapy or injections of any products derived from the patient's blood:

Group 3 procedures - Injection microsclerotherapy (use of injections to treat visible spider veins):

Group 3 procedures - Injection lipolysis or injections of fat dissolving agents:

Group 3 procedures - Dermal micro coring (removal of small amounts of skin to reduce visible signs of aging):

Group 3 procedures - Hay fever injections:

Group 3 procedures - Any procedure involving intravenous fluids or drawing and processing bloods for cosmetic or lifestyle purposes, for instance provision of intra venous vitamins and minerals, or intra venous blood oxygenation.:

Group 3 procedures - Use of dermal fillers for the purpose of augmentation of e.g. the breasts and buttocks:

Group 3 procedures - Deeper chemical peels such as phenol peels:

Group 3 procedures - All laser treatments not specified above, including lasers which target the deeper layers of the dermis.:

Group 3 procedures - Carboxytherapy (the injection of CO2 under the skin to promote collagen production):

Group 3 procedures - Cellulite subcision (making small incisions to reduce appearance of cellulite):

Group 3 procedures - Electrocautery (removal of skin tags through electricity):

Group 3 procedures - Cryotherapy and cryocautery (use of extreme cold to remove e.g. skin tags):

Group 3 procedures - Thread lifting and cogs (placement of dissolvable material under skin to tighten appearance and promote collagen):

Group 3 procedures - All group 1 or 2 procedures where procedures are carried out in an intimate area (except hair removal and not including procedures such as tattooing and skin piercing which are already licenced):

4 Please provide any comments you have in relation to the grouping of procedures and the level of regulation required:

Please give us your views:

Thank you for the opportunity to comment on the Scottish Government's proposals around the regulation and licencing of non-surgical cosmetic procedures.

The General Medical Council (GMC) work with doctors, physician associates (PAs), anaesthesia associates (AAs), patients, and other stakeholders to support good, safe patient care across the UK. We set the standards doctors and those who train them need to meet, and help them achieve them, and give guidance and advice to help doctors, PAs and AAs understand what's expected of them. If there are concerns these standards may not be met or that public confidence in doctors may be at risk, we can investigate, and take action if needed. We work to make sure that education and training outcomes prepare doctors to deliver good, safe patient care across the UK. We also check who is eligible to work as a doctor, PA or AA in the UK and check they continue to meet the professional standards we set throughout their careers.

We do not have a role to provide clinical advice, advise on specific procedures or determine the appropriate environment to carry them out. Therefore, we are not in a position to contribute to the consultation questions about the various proposed procedure groupings. However, our standards of practice for registrants who offer cosmetic interventions says at paragraph 13 that they should be satisfied that 'the environment for practice is safe, suitably equipped and staffed and complies with any relevant regulatory requirements'. The Scottish Government proposals in relation to non-surgical cosmetic practice, as outlined in the consultation document, would in our view provide a helpful framework to support good practice in this area and promote appropriate standards of care, and Healthcare Improvement Scotland would appear to be the agency best placed to set and regulate standards for practice environments.

Questions about the proposed licensing regime

5 Do you support or oppose the proposal that the practitioner of a Group 1 procedure operating in a licensed premises should also require a licence?

Not Answered

6 Do you support or oppose the proposal that the practitioner of a Group 1 procedure operating in a HIS regulated setting should not require a licence?

Not Answered

7 Please provide any comments about the answers you have given to questions 5 and 6 about the proposals for the establishment of licensing arrangements for Group 1 procedures:

Please give us your views:

8 To what extent do you agree or disagree that the Scottish Government should establish:

Standards for Licenced premises - Standards of hygiene and health and safety for licensed premises?:

Standards for Licenced premises - Standards of training and qualification for licensed practitioners?:

Standards for Licenced premises - Mandatory insurance and indemnity to compensate clients who suffer harm as a result of negligence or malpractice?:

9 To what extent do you agree or disagree that local authority officers should have powers of inspection and enforcement, including:

Enforcement & Inspection powers for Local Authorities - The removing of a licence from premises or practitioners who cannot demonstrate compliance with standards established by the Scottish Government?:

Enforcement & Inspection powers for Local Authorities - Barring individuals from holding a licence if they are associated with serious or repeated non-compliance with the standards established by the Scottish Government?:

10 Which of the following statements do you agree with in relation to whether a vehicle can receive a licence as a premises? (Pick one)

Not Answered

Questions about the restriction of procedures to a HIS regulated setting

11 To what extent do you agree or disagree that the Scottish Government should establish:

Standards of training and insurance for non-healthcare professionals - Standards of training and qualification for non-healthcare and healthcare professionals undertaking procedures in HIS regulated services?:

Standards of training and insurance for non-healthcare professionals - Mandatory insurance and indemnity to compensate clients who suffer harm as a result of negligence or malpractice?:

12 Do you agree or disagree that the healthcare professional supervising a group 2 procedure should:

Supervising healthcare professional - Conduct the / any initial consultation(s) with the client?:

Supervising healthcare professional - Prescribe any medications (e.g. Botox TM, lidocaine) required during the procedure, or required for the management of any complications that arise?:

Supervising healthcare professional - Remain available on site for the duration of any procedure?:

Supervising healthcare professional - Be responsible for ensuring the practitioner is suitably trained for the procedure?:

Supervising healthcare professional - Be responsible for ensuring the procedure will be undertaken safely?:

Supervising healthcare professional - Be themselves suitably trained and qualified in the procedure being undertaken?:

13 Thinking about the healthcare professional undertaking a group 3 procedure, which statement below do you agree with:

Not Answered

14 If your answer to the last question was that these procedures should only be undertaken by certain healthcare professionals, please tick all the healthcare professionals to which they should apply:

15 Do you agree or disagree that the following settings should be required to register with Healthcare Improvement Scotland if they are offering non-surgical cosmetic procedures?

Healthcare settings - HIS registration - GP practices:

Healthcare settings - HIS registration - Dental practices:

Healthcare settings - HIS registration - Community pharmacies:

16 Do you agree or disagree that Healthcare Improvement Scotland should have powers of inspection, including powers of entry and inspection of unregistered settings where there is reason to believe registration is required?

Not Answered

Questions about age restrictions

17 Which of the following statements is closest to your view? (please select only one option)

Not Answered

18 Regardless of your answer to question 17, if an age limit is to be put in place please indicate for each procedure group what you think is the appropriate age to be set for the procedures in that group.

Preferred Age Limit - Procedure Group 1:

Preferred Age Limit - Procedure Group 2:

Preferred Age Limit - Procedure Group 3:

19 Do you agree or disagree that procedures on intimate areas should only be available to clients of 18 years of age and over?

Not Answered

Questions about equalities, Fairer Scotland duty, impact on island communities and UNCRC

20 What are your views on how, if at all, the introduction of licensing and regulation of the non-surgical cosmetics sector in Scotland might affect anyone based on their protected characteristics?

Please give us your views.:

21 What are your views on how the introduction of licensing and regulation of the non-surgical cosmetics sector in Scotland might affect people differently based on their financial situation?

Please give us your views.:

22 What are your views on how the introduction of licensing and regulation of the non-surgical cosmetics sector in Scotland might affect access to safe, high-quality services in island communities?

Please give us your views.:

23 What are your views on how the introduction of licensing and regulation of the non-surgical cosmetics sector in Scotland and the potential of age restrictions might affect respecting, protecting and fulfilling the rights of children and young people as set out in the UN Convention on the Rights of the Child?

Please give us your views.:

While we are not in a position to advise on age limits for particular procedures, our guidance emphasises that doctors must only provide cosmetic interventions that are in the best interests of the child or young person (see paragraph 33 in Guidance for doctors who offer cosmetic interventions). We provide further guidance on the relevant factors doctors need to consider in carrying out an assessment of best interests in paragraphs 12-13 of our 0-18 Years guidance). An approach which limits cosmetic procedures for children and young people, unless approved by a doctor on the grounds it is in their best interests, would be in line with this.

About you

24 What is your name?

Name:
Andrew Fraser

25 Are you responding as an individual or an organisation?

Organisation

26 What is your organisation?

Organisation:
General Medical Council

27 Further information about your organisation's response

Please add any additional context:

28 Further information about your connection to the non-surgical cosmetic procedures sector

Not Answered

29 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

30 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

31 What is your email address?

Email:
andrew.fraser@gmc-uk.org

32 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

33 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.: