



The Australasian College of Cosmetic Surgery

Raising Standards, Protecting Patients

5 October 2007

Adj Prof Margaret Banks
Policy Team Manager
Australian Commission on Safety & Quality
In Health Care
GPO Box 5480
Sydney NSW 2001

Dear Prof Banks

The College has been pleased to be involved in the review process for accreditation and credentialing standards with your committee. We look forward to continued constructive dialogue which will be required to reach a final solution which is protective of patient's rights and mindful of the safety issues.

The key areas with which the College is concerned is that regarding credentialing to facilities and clinical scope of practice. In the current credentialing system it is mandated that doctors credentialing to facilities be on the basis of training and expertise in a particular area and proof of competence in that area. It is important that the position of any particular academic degree or College Fellowship is not the main criteria for credentialing.

The College recently has been involved in the development of standards for cosmetic practices and I have appended the resulting national standards which have been formulated in conjunction with professional standards bodies and other professional bodies.

The next issue relates to credentialing of facilities and the manner of their operations. This area is also complex and unfortunately at this time plagued by duplication throughout various jurisdictions. Various State health bodies and regulatory departments already impinge on the provision of clinical services and a national guideline and standard is a preferable situation that genuinely reflects the competencies and rights of doctors to practice and is also mindful of safety issues for patients.

In the national credentialing system it is important to note that this relates only to registered medical practitioners as I understand it. There is one area of concern which faces the College and other professional bodies and that is of unregulated medical practice.

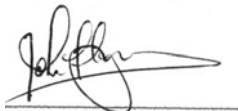
Specifically in the realms of cosmetic practice there are a large number of beauty therapists or other designated “ Paramedicals” who are providing clinical services to the public. These may take the form of injections or more commonly light based treatments such as laser treatments and IPL programmes. A problem that the College sees is that those in the community with the best training and the incentives for good ethical practice, namely medical practitioners, are often regulated, sometimes over regulated in their provision of services.

Regulations which may be duplicated across different jurisdictions also add to cost pressures in the provision of clinical services. In the particular case of the beauty therapists afore mentioned not being subject to such regulation means that those in the community with a lesser standard of education and a lesser standard of experience and a reduced duty of care to the public are left largely unfettered in their provision of medical services. Additionally, because they are not subject to regulation the cost for provision of their services can be seminally reduced and thereby provide a further attraction to members of the public who may not be able to discern readily the differences of quality of service being provided. Whilst we recognize that beauty therapists and other paramedicals have a role to play in the provision of clinical services to the public I think it essential that some degree of regulation and some degree of supervision and oversight be incorporated into the national guidelines to help protect the public. I understand this is a difficult area which impinges on competition law and trade restraint and the College reiterates its desire to work constructively with your committee to reach an appropriate solution.

In addition the College has produced a guideline for advertising and guidelines for informed consent for patients which we believe are appropriate in the present circumstances. I have also appended these documents.

Thank you once again for seeking the College’s participation, we look forward to working with you as may be required and appropriate to refine the standards as necessary.

Yours faithfully



Dr John Flynn
CEO
Australasian College of Cosmetic Surgery