

Response ID ANON-EP2D-FXB8-3

Submitted to **Consultation on the Regulation of Non-Surgical Cosmetic Procedures in Scotland**

Submitted on **2020-03-09 15:24:46**

Proposals for Reform

1 Do you agree that further regulation of non-surgical cosmetic procedures is needed?

Yes

Please explain your answer.:

More regulation is required to give the public assurance that the practitioners they choose are being held to an appropriate level of professional standards and are competent to carry out the procedures. In addition more transparency on training and competencies is required. No-one should be barred from practising provided they are practising within their competencies and have undergone the required training. This information should be visible to the public

2 Do you agree that the carrying out of non-surgical cosmetic procedures (that pierce/penetrate the skin) by individuals who are not qualified healthcare professionals should be licenced under Part 1 of the Civic Government (Scotland) Act 1982?

Yes

Please explain your answer.:

We agree that this would be in the interests of public safety and that an approach similar to that already in place for tattoo parlours would be appropriate for premises and for all individuals practising in those premises. In addition, the practitioners should adhere to the Joint Council of Cosmetic Practitioners (JCCP) competency framework and be listed on their voluntary register to provide transparency of training and competencies in the different aesthetic procedures.

3 Do you agree that services provided by pharmacists who undertake independent healthcare practices (including non-surgical cosmetic procedures), outwith the terms of an NHS contract should be regulated byHealthcare Improvement Scotland?

Yes

Please explain your answer.:

Yes this would align pharmacists with other health professionals providing similar services.

Has the General Pharmaceutical Council (GPhC) agreed to regulate the activities of pharmacists providing cosmetic procedures within a registered pharmacy to same standards as Health Improvement Scotland ? This agreement will be necessary to ensure that procedures carried out on registered premises are of the required standard and consistency is maintained. It is sensible that to avoid overlap his task falls to GPhC inspectors who are already scrutinising premises and the GPhC is already responsible for the fitness to practice standards of individual pharmacists . If however the GPhC are not minded to carry out out regulation on registered premises then these would require to be regulated by Health Improvement Scotland in the same way as proposed for non- registered premises.

4 Do you have any other comments?

Do you have any other comments?:

If the premises are licenced with an individual licence holder how will you ensure that anyone employed by the licence holder is also competent, hence suggestion above for individuals to be listed on JCCP register.

About you

What is your name?

Name:

Aileen Bryson

What is your email address?

Email:

aileen.bryson@rpharms.com

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Royal Pharmaceutical Society

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

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

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

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?:

Slightly satisfied

Please enter comments here.:

It is relatively easy to input .