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### **Consultation on *Guidance for all doctors who offer cosmetic interventions***

The Professional Standards Authority for the Health and Social Care welcomes the opportunity to contribute to the consultation on the draft Guidance for all doctors who offer cosmetic interventions.

#### **About the Professional Standards Authority**

As you know the Authority promotes the health, safety and wellbeing of patients, service users and the public by raising standards in regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament.

As part of our work we:

- Oversee nine health and care professional regulators and report annually to Parliament on their performance
- Conducts audits and investigations and can appeal fitness to practise cases to the courts if sanctions are unduly lenient and it is in the public interest
- Conduct research and advise the four UK governments on improvements in regulation
- Promote our concept of right-touch regulation and publish papers on regulatory policy and practice
- Accredit voluntary health and care occupational registers to improve consumer protection and raise standards

More information about our work and the approach we take is available at [www.professionalstandards.org.uk](http://www.professionalstandards.org.uk)

## **Our response to the consultation**

In our paper *Asymmetry of Influence* written for and published by the Health Foundation in October 2013, we wrote about the risks that arise when similar guidance on the same matter appears in different documents or from different sources, because of our concern that professionals will be caused doubt and anxiety about whether the different sources are consistent with each other, and will disengage from the guidance in deciding how to act.

We have a similar concern about the format that has been adopted in this draft. The vast majority of the 49 paragraphs appear to be general statements from *Good Medical Practice*, or at the least have wider applicability than cosmetic interventions.

We think that a more accessible and impactful approach for this guidance would be to focus on the specific considerations applying to cosmetic interventions, while also stating that the general principles of *Good Medical Practice* apply.

The full text of *Asymmetry of Influence*, which explains more fully the nature of our concern about multiple sources of guidance at page 6, is available here:  
<http://www.health.org.uk/publication/asymmetry-influence-role-regulators-patient-safety>

We would be pleased to discuss this response further with you. Please feel free to contact me at [douglas.bilton@professionalstandards.org.uk](mailto:douglas.bilton@professionalstandards.org.uk)

Yours sincerely,

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