

Views on “Regulation of medical beauty treatments/procedures”

Responses from The Provisional Hong Kong Academy of Nursing Limited

We welcome to have a review on the needs of introducing a more comprehensive regulatory framework to regulate the performance of high-risk medical procedures/treatments. With the development in technology and communication, healthcare industry has been radically transformed with the high-risk beauty service as one of the results. However, this kind of unprecedented health related services not only creates challenges to the healthcare system but also has enormous implications for the nursing profession. As clients’ advocates and nurses in the advanced practice role, we have the following views:

1. The differentiation between high-risk medical procedures and low-risk, non-invasive beauty services should be defined as soon as possible.
 - Invasive procedures should be considered as high-risk medical procedures. An invasive procedure refers to a diagnostic or therapeutic technique that requires insertion of an instrument or device into the body through the skin or a body cavity or interruption of normal body functions (<http://medical-dictionary.thefreedictionary.com/invasive+procedure>; Stedman’s Medical Dictionary (2005)).
2. Educate the general public, members in beauty industry and medical professionals regarding the legal definitions of high-risk versus low-risk medical procedures once the definitions are confirmed.
3. In the future regulatory framework, all high-risk (invasive) procedures should be carried out in regulated healthcare facilities. We need practitioners qualified in the specific area to undertake procedures, intervene and follow through outcomes. In nursing as well as medical practice, the general registration is a basic requirement, but the possession of relevant post-registration education in the specific area is also important to ensure public safety. Therefore, high-risk procedures should only be performed by qualified registered medical practitioners, registered nurses and/or registered nurses in advanced practice role depend on the complexity and invasiveness of the procedure.
 - Level of licensing may be required to regulate different degrees of high-risk medical procedures to be performed at various levels of regulated healthcare facilities. With license and re-license requirements, the standards of good practice of the facility regarding governance, quality management, patient care, risk management, clinical standards and so forth will be under control.
 - Having registered medical doctors and nurses to perform high-risk medical

beauty treatments/procedures is the key to ensure patient safety. Their quality of practice and professional conducts will be regulated by their respective registered professional bodies.

- To maintain quality care with confined cost, nurses with advanced practice experience may be the ideal medical personnel in this unprecedented reshaping role. Advanced practice nurses (APN) are registered nurses normally holding a master's degree with a specialization in an area of advanced nursing. They possess an advanced level of medical as well as nursing knowledge together with rich clinical experience in patient care.
 - The title of 'nurse' needs to be used discriminatingly so as not to confuse the public. In Hong Kong, all professional nurses are registered with Nursing Council of Hong Kong after graduated from an accredited educational program.
4. To protect the public, a written informed consent should be obtained from all clients before any invasive procedure. All potential risks may be resulted from the procedure should be clearly listed in the consent.
 5. A legal penalty mechanism should be established for any individuals and/or any facilities to perform unauthorized procedures. The list of individuals and facilities offended the law in this regard should be accessed by the public.

To conclude, we support the government to initiate measures to regulate medical beauty treatments/procedures in order to protect the public. The Provisional Hong Kong Academy of Nursing is delighted to participate in this review and ready to contribute in the regulatory process as well.