



Consumers
Health Forum
of Australia

Ref: S0802

20 May 2009

Gavin Jones
Australian Competition and Consumer Commission
GPO Box 520 Melbourne VIC 3001

Dear Mr Jones

**Australasian College of Cosmetic Surgery application for authorisation A91106 –
amended Code of Practice**

Thank you for the opportunity for the Consumers Health Forum of Australia (CHF) to comment on the additional amendments to the Code of Practice for the Australasian College of Cosmetic Surgery (ACCS).

CHF comments are based on past consultations with consumers about codes of practice and the health workforce. CHF comments relate to revisions to the code of practice.

Information about training and experiences

Information about cosmetic surgeons training and experiences must be made publically available to consumers and should also include information about relevant qualifications and areas of speciality. This information will assist consumers to make informed decisions about which cosmetic surgeon best meets their health needs.

CHF notes that the ACCS clause 3.3 'additionally all Members must have available for patients a written summary (for example in the form of a resume) of their own training and experience' does not provide for this information to be made publically available. It implies that it will only be available to consumers who are already patients of the surgeon. For this information to be of utmost benefit to consumers, it must also be available to consumers *before* they decide on a cosmetic surgeon.

CHF recommends that this information is made available on a public register or website (with paper versions for consumers without internet access). Furthermore, CHF recommends that each cosmetic surgeon provides this information to consumers in a consistent, user friendly format.

CHF notes that the National Registration and Accreditation Scheme (NRAS) will ensure that registered health professionals make information about their qualifications, experiences, training and specialities available in a public register.

Appeals Committees

CHF notes that an appeals committee is proposed to be *primarily* independent. CHF recommends that the appeals committee is *entirely* independent and includes a consumer representative on the committee.

Expulsions to be made public

CHF recommends that expulsions are made publically available. Providing this information to consumers will help to protect the public interest. CHF notes that the NRAS has the requirement for mandatory reporting of health professionals who are placing the public at risk¹ and CHF strongly recommends that the ACCS Code of Practice also requires this.

CHF thanks the ACCC for the opportunity to comment on this important issue for health consumers.

Yours sincerely



Carol Bennett
EXECUTIVE DIRECTOR

¹ For further information please see the Australian Health Workforce Ministerial Council Communiqué on 8 March 2009 at <http://www.nhwt.gov.au/documents/National%20Registration%20and%20Accreditation/Design%20of%20new%20National%20Registration%20and%20Accreditation%20Scheme.pdf>