# Australian Medical Council Limited

## New Standards for Assessment and Accreditation of Cosmetic Surgery Programs of Study

### Consultation paper



The Australian Medical Council (AMC) is developing standards for accreditation of cosmetic surgery programs.

It is consulting on the draft accreditation standards including a

set of outcome (capability) statements. These proposals have been developed by the AMC with advice from two advisory groups established for this project:

- a Project Advisory Group which has broad stakeholder membership. The terms of reference and membership of the Group is available <u>here</u>.
- a Technical Advisory Group. The terms of reference and membership is available <u>here</u>.

The advice of these groups, the report of the *Independent review of the regulation of medical practitioners who perform cosmetic surgery* commissioned by the Medical Board of Australia (Medical Board) and the Australian Health Practitioner Regulation Agency (Ahpra), and the Medical Board's Codes, guidelines and draft registration standard have informed the proposals outlined in this consultation document.

This consultation will run for four weeks until 4pm, Wednesday 15 February 2023.

This paper provides an overview of the standards and related outcome (capability) statements. There are three attachments:

- <u>ATTACHMENT A</u>: Proposed Outcome (Capability) Statements Draft for consultation January 2023
- <u>ATTACHMENT B</u>: Proposed Standards for Assessment and Accreditation of Cosmetic Surgery Programs – Draft for consultation January 2023
- <u>ATTACHMENT C</u>: Consultation questions template Standards for Assessment and Accreditation of Cosmetic Surgery Programs
- 1 Why is the AMC developing accreditation standards for cosmetic surgery programs?

The AMC is the national standards and assessment body for medicine. Its purpose is to ensure that standards of education, training and assessment of the medical profession promote and protect the health of the Australian community. It is the designated accreditation authority for the medical profession under the *Health Practitioner Regulation National Law* as in force in each state and territory (the National Law) and its accreditation functions sit within the National Registration and Accreditation Scheme for health professions.

The AMC assesses medical programs and their providers for all phases of medical education against accreditation standards and grants accreditation to the programs that meet the standards.

The National Law provides for the endorsement of registration for an area of practice.

The report of the Independent review of the regulation of medical practitioners who perform cosmetic surgery, commissioned by the Medical Board of Australia and Ahpra and released in September 2022, found that one of the most consistent themes to arise during the review was the issue of the education, training and qualifications of practitioners undertaking cosmetic surgery, or more specifically, the absence of any minimum standards about these matters. It recommended that cosmetic surgery be endorsed as an area of practice. An endorsement recognises that a person has an extended scope of practice in a particular area because they have obtained a specific qualification in that area that has been approved by the Medical Board.

The report indicates that one benefit of endorsement is that it would set a clear minimum standard of training for practitioners providing cosmetic surgery. An accreditation standard for the program of study could be set at a sufficiently high level to ensure a program enables medical practitioners to have the necessary knowledge and skills to practise competently and safely. Only those programs of study that are assessed as meeting the accreditation standards would be approved for the purposes of endorsement.

On 2 September 2022 Health Ministers announced that they had endorsed the decision of the Medical Board to commence work on establishing cosmetic surgery as an area of practice for which the registration of a medical practitioner may be endorsed.

Implementing the recommendation for establishment of an area of practice endorsement means developing accreditation standards for programs of study and their providers in the area of practice, cosmetic surgery, and implementing processes for assessment and accreditation of the programs of study. As the accreditation authority for the medical profession in the National Regulation and Accreditation Scheme, the AMC is responding to the Medical Board's proposal for the development of an area of practice endorsement for cosmetic surgery.

Endorsement, and the work by the Medical Board and the AMC is outlined on the Medical Board of Australia's webpage <u>https://www.ahpra.gov.au/Resources/Cosmetic-surgery-hub/About-endorsement.aspx</u>

As well as developing accreditation standards, the AMC is developing procedures for accreditation of programs of study, and templates and guidelines to assist education providers who wish to apply for accreditation of a program.

The Medical Board approves accreditation standards developed by the AMC. Once programs are accredited by the AMC against the standards, the Medical Board also makes the decision on approval of qualifications provided by accredited programs of study for endorsement.

Please see the glossary at the end of the document for an explanation of the key terms and organisations mentioned in this document.

## 2 What are the standards and graduate (capability) statements?

The National Law defines an accreditation standard as 'a standard used to assess whether a program of study, and the education provider that provides the program of study, provide persons who complete the program with the knowledge, skills and professional attributes necessary to practise the profession in Australia.'

The AMC uses accreditation standards to assess education providers and their programs of study for accreditation. Once programs are accredited the AMC uses the standards to monitor whether the program and provider continue to meet accreditation standards.

The draft standards have two parts: the outcome (capability) statements and standards for cosmetic programs of study.

The outcome (capability) statements are part of the standards. They define the knowledge, skills, professional behaviours, and attributes that graduates of an accredited cosmetic surgery program will be able to demonstrate.

They provide the basis for education providers' curricula and assessments.

The AMC developed a set of domains for outcomes statements in 2013. This classifies the capabilities expected of medical program graduates into four areas: practitioner; professional and leader; health advocate; scientist and scholar. This structure applies to outcomes for primary medical programs (medical school programs) and for the medical internship. The structure has most recently been reviewed in 2020-2022 as part of the review of standards for those two phases of medical education. The AMC is drawing on the same structure for the outcome statements for cosmetic surgery programs of study and has retitled the statements "outcomes (capability) statements". Statements have been revised and customised for the area of practice of cosmetic surgery. This work draws extensively on other curricula nationally and internationally, and advice from the AMC's Technical Advisory Group.

The revised domains proposed for cosmetic surgery programs of study are as follows:

Outcomes (capabilities)	Domain 1	The cosmetic surgery practitioner
	Domain 2	The cosmetic surgery practitioner as a professional and leader
	Domain 3	The cosmetic surgery practitioner as a health advocate
	Domain 4	The cosmetic surgery practitioner as a reflective and evidenced informed practitioner

The AMC has developed a common structure for the accreditation standards across the phases of medical education, with separate national standards for each phase. Each set of standards is grouped into areas relating to the key elements in a curriculum development process. For cosmetic surgery programs of study, the draft accreditation standards use the grouping proposed in the most recent review of the standards for primary medical programs, as follows:

Accreditation standards	Standard 1	Purpose, context and accountability of the provider and the program of study
	Standard 2	The Curriculum
	Standard 3	Assessment of Learning
	Standard 4	Trainees
	Standard 5	Resources to deliver the Program of Study
	Standard 6	Monitoring, Evaluation and Reporting

The standards build on the AMC's experience in developing accreditation standards and draw on the standards used for other phases of medical education and training. However, as outlined in the Independent Review, the cosmetic surgery sector, including the education and training of practitioners to perform cosmetic surgery, presents unique environmental factors. The draft accreditation standards also include some new standards that will require education providers to demonstrate that they have specific processes, mechanisms, and policies as a response to the specific education and training context and environment, and the patient safety concerns related to the cosmetic surgery sector.

In developing the accreditation standards, the AMC takes account of the standards in comparable disciplines, higher education including the Higher Education Threshold Standards, and countries with comparable medical education and practice standards. It also reviews AMC accreditation standards for other phases of medical education and training.

The AMC considers Medical Board of Australia registration standards, codes, and guidelines, and other relevant national and international reports and policies relating to education and training in medicine. In particular, the AMC has drawn on the Medical Board document *Good Medical Practice: A Code of Conduct for Doctors in Australia* as well as current work of the Medical Board:

- Draft Registration standard: Endorsement of registration for cosmetic surgery for registered medical practitioners
- Draft revised Guidelines for medical practitioners who perform cosmetic medical and surgical procedures
- Draft Guidelines for medical practitioners who advertise cosmetic surgery.

The AMC takes account of the Procedures for the Development of Accreditation Standards that apply under the National Law. In proposing new or amended accreditation standards, the AMC must consider the objectives in the National Law.

The AMC has considered the National Registration and Accreditation Scheme's key objective of protecting the public by ensuring only medical practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered. The accreditation standards support that objective by setting the expectations of education providers and

programs of study to provide graduates of their programs with the knowledge, skills, and processional attributes for safe and competent practice in cosmetic surgery.

#### 3 Consultation on the standards

The AMC's consultation builds on the extensive public consultation with organisations, practitioners, patients and consumers undertaken during the Independent review and on the Medical Board 's development of a draft registration standard and guidelines.

The Independent review of the regulation of medical practitioners who perform cosmetic surgery consulted on patient safety issues in cosmetic surgery and sought views on the endorsement model, how advertising regulation could be strengthened, and which areas of the cosmetic guidelines needed to be strengthened. The AMC has used the review's final report and other information from the review, as well as discussions with the Independent Reviewer, to inform the development of these proposed documents.

The AMC is using a shorter, streamlined consultation process than its usual consultation periods for this consultation as it is working with the Medical Board to address Health Ministers' expectation of urgent action to reform medical regulation of cosmetic surgery.

The AMC consults so that standards are informed by a wide range of views from stakeholders in the medical education process. Face to face or video meetings are used to supplement written consultations.

#### Tell us what you think

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The AMC is inviting feedback on the draft accreditation standards for cosmetic surgery programs. The AMC will consider all the feedback received when shaping the next iteration of the standards.

The public consultation process will include the publication of the consultation paper on the Medical Board's website and informing stakeholder organisations directly. A template for responding to the accreditation standards is available for ease of submitting feedback.

The AMC is also inviting key stakeholders to comment on the proposed accreditation standards including other accreditation authorities for regulated health professions, professional organisations, medical education providers and standards bodies, patient safety organisations, consumer groups, Aboriginal and Torres Strait Islander groups and health jurisdictions.

The consultation process will include a range of opportunities for providing feedback including:

- <u>Written consultation</u>: Using the mechanisms described in this document.
- <u>Workshop sessions</u>: Small group (Zoom or in-person) workshops will be organised based on stakeholder requests and where AMC sees benefit in requesting further detailed discussions.

If you or your organisation wish to speak to the AMC about the standards, please contact us at <u>cosmeticsurgery@amc.org.au</u>

We have provided questions about the standards under **ATTACHMENT C**: Consultation questions template – New Standards for Assessment and Accreditation of Cosmetic Surgery Programs. The other relevant attachments for this consultation are:

**ATTACHMENT A**: Proposed Outcome (Capability) Statements – Draft for consultation January 2023

**ATTACHMENT B**: Proposed Standards for Assessment and Accreditation of Cosmetic Surgery Programs – Draft for consultation January 2023

**ATTACHMENT C**: Consultation questions template – Standards for Assessment and Accreditation of Cosmetic Surgery Programs

We are seeking feedback by 4pm on Wednesday, 15 February 2023.

Please provide your response, by email, as a Word document or non-protected PDF document using ATTACHMENT C: Consultation questions template – Proposed Standards for Assessment and Accreditation of Cosmetic Surgery Programs – to cosmeticsurgery@amc.org.au

# Glossary

*Australian Health Practitioner Regulation Agency (Ahpra)*: The national body that works in partnership with 15 National Boards to register and regulate the 16 health professions in the National Registration and Accreditation Scheme.

**Australian Medical Council (AMC)**: An independent national standards body for medical education and training. The AMC develops accreditation standards and policies, and accredits programs of study that meet the standards. It is also responsible for assessment of international medical graduates for registration in Australia. It acts as an external accreditation entity for the purposes of the Health Practitioner Regulation National Law and advises ministers and regulators on medical program accreditation matters and standards, medical practitioner registration matters, and the recognition of medical specialties.

**Good Medical Practice:** A code of conduct for doctors in Australia: Good Medical Practice describes what is expected of all doctors registered to practise medicine in Australia. It sets out the principles that characterise good medical practice and makes explicit the standards of ethical and professional conduct expected of doctors by their professional peers and the community. The code is addressed to doctors and is also intended to let the community know what they can expect from doctors.

*Health Practitioner Regulation National Law (National Law)*: The uniform legislation in force across all states and territories that governs the National Registration and Accreditation Scheme (National Scheme).

**Independent Review:** the Independent review of the regulation of medical practitioners who perform cosmetic surgery commissioned by Ahpra and the Medical Board of Australia in November 2021, led by Mr Andrew Brown, former Queensland Health Ombudsman, supported by an expert panel. The final report of the Independent Review was published on 1 September 2022.<sup>1</sup>

*Medical Board of Australia (Medical Board)*: One of 15 National Boards in the National Registration and Accreditation Scheme, the Medical Board registers medical practitioners and students; develops standards, codes and guidelines for the profession; investigates notifications and complaints about medical practitioners; conducts panel hearings and refers serious health, performance and conduct matters to Tribunal hearings; assesses international medical graduates who wish to practice in Australia; approves accreditation standards developed by the AMC and AMC-accredited programs of study.

*Medical Board Guidelines, Guidelines for Registered Medical Practitioners Who Perform Cosmetic Medical and Surgical Procedures,* issued by the Medical Board of Australia. The Guidelines came into effect on 1 October 2016. The Medical Board is consulting on changes to these Guidelines.

*National Registration and Accreditation Scheme (National Scheme):* The National Scheme regulates and registers health practitioners across all states and territories, allowing cross-jurisdictional practice. The National Scheme ensures that all regulated health professions practise in line with national standards.

<sup>&</sup>lt;sup>1</sup> Brown, A (2022). Final report: Independent review of the regulation of medical practitioners who perform cosmetic surgery, commissioned by Ahpra and the Medical Board. Available from <a href="https://www.ahpra.gov.au/News/Cosmetic-surgery-independent-review-of-patient-safety.aspx">https://www.ahpra.gov.au/News/Cosmetic-surgery-independent-review-of-patient-safety.aspx</a>