

# Standards for Non-Surgical Cosmetic Services

Health Regulation Department

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Dubai Health Authority

## BACKGROUND

Dubai Health Authority (DHA) is the sole responsible entity for regulating, licensing and monitoring all health facilities and Healthcare Professionals (HP) in the Emirate of Dubai.

The Health Regulation Department (HRD) is an integral part of DHA and was founded to fulfil the following overarching strategic objectives:

Objective # 1: Position Dubai as a global medical destination by introducing a value-based, comprehensive, integrated and high quality service delivery system.

Objective # 2: Direct resources to ensure happy, healthy and safe environment for Dubai population. This document has been developed by HRD to improve the quality and safety of Non-Surgical Cosmetic Services provided by DHA licensed HP in health facilities under DHA jurisdiction.

## ACKNOWLEDGMENT

This document was developed by the HRD in collaboration with Subject Matter Experts. The Health Regulation Department would like to acknowledge and thank these professionals for their dedication toward improving the quality and safety of healthcare services.

**The Health Regulation Department  
Dubai Health Authority**

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## EXECUTIVE SUMMARY

Dubai Health Authority (DHA) is pleased to present the first version of the Standards for Non-Surgical Cosmetic Services, which represents a milestone towards promoting safety programs and improving quality standards in health facilities. The standard sets out the facility and professional and privileging quality and patient safety requirements for non-surgical cosmetic services in the Emirate of Dubai. Data collection and key performance indicators are also noted in the Standard to assist in continuous learning, clinical governance, audit, safety and quality assurance.

The main parts of this Standard include:

- Facility requirements
- Management responsibilities
- Healthcare professional requirements
- Training course requirements
- Granting non-surgical cosmetic procedure privileges
- Medical device safety
- Patient assessment/examination and informed consent
- Treatment and follow up care
- Data collection and key performance indicators

## DEFINITIONS

**Botulin Toxin type A (Botox)** is a neurotoxin used as an injection for certain neurological conditions and also used as a treatment for brow wrinkles, deep frown lines between the eyes, expression lines on the forehead & crow feet around the eyes.

**Chemical Peels** is a skin-resurfacing procedure in which a chemical solution is applied to the skin to remove the top layers. The skin that grows back after a chemical peel is smoother and younger looking. Chemical peels are used to treat wrinkles, skin discoloration, acne and scars — typically on the face. It can be done alone or in combination with other cosmetic procedures.

**Clinical Privilege** means those specific services and procedures that a Healthcare Professional (HP) is deemed qualified to provide or perform through merit, additional qualification or training by the health facility.

**Dermal Fillers** also known as injectable implants, Soft Tissue Fillers, or wrinkle fillers, are medical device implants used in helping to create a smoother and/or fuller appearance in the face, including nasolabial folds, cheeks and lips and for increasing the volume of the back of the hand. There are a number of filler agents; therefore, the physician is responsible to know which substance is best suitable for the patient.

**Manual lymphatic drainage (MLD)** is a type of massage based on preliminary evidence which is hypothesized to encourage the natural drainage of the lymph, which carries waste products away from the tissues.

**Mesotherapy** A procedure in which multiple tiny injections of pharmaceutical or/and vitamins are delivered into the mesodermal layer of tissue under the skin, to promote the loss of fat or cellulite and hair loss treatment.

**Microdermabrasion** is a skin rejuvenation procedure that uses a spray of fine crystals or minute diamond-studded tips to abrade the skin and vacuum suction to remove dead skin cells. A method for improving superficial environmental, aging, hereditary, and posttraumatic skin changes (for example, acne, hyperpigmentation, fine lines) by superficial, mechanically powered abrasion, often combined with application of topical crystals (such as vitamin C). More superficial than traditional dermabrasion and therefore does not ordinarily produce a de-epithelized wound.

**Microdermabrasion treatments** refers to the use of minimally abrasive instrument to gently sand the skin, removing the thicker, uneven outer layer. This type of skin rejuvenation is used to treat light scarring, discoloration, sun damage, and stretch marks.

**Non-surgical Cosmetic Procedures** refers to elective techniques, and principles focused on enhancing a patient's appearance, and can be performed on all areas of the head, neck, and body. These procedures comprise of non-invasive and minimally invasive cosmetic procedures also known as aesthetic non-surgical procedures.

**Surgical Cosmetic Procedures** refers to elective operations and other procedures involves doing incisions, suturing and injectable anesthesia to revise or change the appearance, colour, texture, structure, or position of bodily features.

**Verbal consent** is where the patient orally state the agreement to a procedure/treatment which does not carry a significant risk.

**Written consent (Informed Consent)** refers to an agreement or permission accompanied by full information on the nature, risks and alternatives of a surgical or interventional procedure before the doctor begins the procedure/treatment. Accordingly, the patient either consents to or refuses.

## ABBREVIATIONS

**DHA:** Dubai Health Authority.

**HP:** Healthcare professional.

**HRD:** Health Regulation Department.

**MOHP:** Ministry of Health and Prevention

**SME:** Subject Matter Experts

## 1. INTRODUCTION

The cosmetic sector encompasses an enormous range of services. These services can be categorised into two distinct fields that is, surgical and non-surgical. The growing interest for cosmetical services has prompted the need to put in place regulation.

Dubai Health Authority (DHA) has therefore developed Standards for Non-Surgical Cosmetic Services to assure all health facilities and professionals meet the minimum obligations for high quality and safe care. All health facilities must ensure their Healthcare Professionals (HP) only provide services that are within the facility scope of practice and granted privileges. HP have a duty to ensure they maintain their knowledge and skills to provide safe, high quality and effective services. HP should ensure they work within the parameters of good governance and medical ethics at all times.

HP are obliged to work with their patients to ensure decisions making is done in a supportive and collaborative manner. In doing so, HP have the responsibility to:

- Listen to, and respond to, the patient concerns and preferences.
- Give patients the information they want or need in a way they can understand.
- Respect patients' right to reach decisions about their treatment and care.
- Support patients in caring for themselves to improve and maintain their health
- Ensure decisions toward treatment are informed and take into account the treatment options, risks and expected outcomes.

## 2. PURPOSE

- 2.1. To assure provision of the highest levels of safety and quality of Non-Surgical Cosmetic Services at all times.

## 3. SCOPE

- 3.1. Non-Surgical Cosmetic Services in the Emirate of Dubai.

## 4. APPLICABILITY

- 4.1. These standards shall apply to all Dubai Health Authority (DHA) licensed Health Facilities and HP in the Emirate of Dubai.

## 5. STANDARD ONE: FACILITY REQUIREMENTS

- 5.1. Non-surgical cosmetic services will be provided in DHA licensed facilities, which permit either Plastic Surgeries, Dermatology services or Beauty therapy. These facilities include:
  - 5.1.1. Hospital
  - 5.1.2. Day Surgical Centre
  - 5.1.3. Outpatient Care Facility
  - 5.1.4. Beauty salon (only certain procedures can be performed)
- 5.2. The health facility providing Non-Surgical Cosmetic Services should ensure all consumables, equipment, pharmaceutical drugs/products required for each procedure are stored in secured area.

## 6. STANDARD TWO: MANAGEMENT RESPONSIBILITIES

- 6.1. The health facility will have in place documents of the following:
  - 6.1.1. Patient assessment and treatment plan
  - 6.1.2. Service specification for each service
  - 6.1.3. Documentation of patient health record
  - 6.1.4. Patient information and informed consent (**appendix 1**)
  - 6.1.5. Treatment protocols
  - 6.1.6. Post procedure patient care plan
  - 6.1.7. Out of hours contact information for emergency cases
  - 6.1.8. Confidentiality and data protection policy
  - 6.1.9. Infection control policy
  - 6.1.10. Patient complaint policy

## 7. STANDARD THREE: HEALTHCARE PROFESSIONAL REQUIREMENTS

- 7.1. At least one (1) Consultant/Specialist Physician must be available to supervise non-surgical cosmetic services in a DHA licensed health facility.
  - 7.1.1. The following licensed physicians are permitted to supervise non-surgical cosmetic services with no additional training requirements:
    - a. Consultant/Specialist Dermatologist.
    - b. Consultant/Specialist Plastic Surgeon.

7.2. Other Physicians such as General Practitioners (GP) may be granted privileges to their current scope of practice by the health facility with the provision that they meet the following minimum requirements (**appendix 2**):

7.2.1. Have a valid DHA license.

7.2.2. Obtain specified training for the procedure from a DHA approved training centre or by an internationally recognised entity approved by the regulator in the respective country.

a. The certificate should state the number of completed Continuous Medical Education (CME) hours and should satisfy the minimum requirements for competency for clinical practice.

7.2.3. Proof of hands-on training of at least (10) cases under the supervision of a Consultant/Specialist Plastic Surgeon or Consultant/Specialist Dermatologist.

7.2.4. Valid Basic Life Support (BLS) Certificate.

7.3. Registered Nurses (RN) may only provide non-surgical cosmetic services where it is prescribed by a DHA licensed Consultant/Specialist Dermatologist or Consultant/Specialist Plastic Surgeon and in accordance to their written instructions and treatment plan as set out in **appendix 2** with the provision that they meet the following minimum requirements:

7.3.1. Have a valid DHA license.

- 7.3.2. Obtain specified training for the procedure from a DHA approved training centre or by an internationally recognised entity approved by the regulator in the respective country.
- a. The certificate should state the number of completed Continuous Medical Education (CME) hours and should satisfy the minimum requirements for competency for clinical practice.
- 7.3.3. Proof of hands-on training for at least (10) cases under the supervision of Consultant/Specialist Plastic Surgeon or Dermatologist.
- 7.3.4. Valid Basic Life Support (BLS) Certificate.
- 7.4. Dentist, Dental Hygienist, Physiotherapist, Massage Therapist may perform a limited number of procedures as set out in **appendix 2** and must also meet the requirements set out in section 7.3.1 to 7.3.4.
- 7.5. Beauty Therapist fulfilling the requirements set out in section 7.3.1 to 7.3.4; can perform limited procedures in beauty salon or health facility as set out in **appendix 2**.

## 8. STANDARD FOUR: TRAINING COURSE REQUIREMENTS

- 8.1. All HP must undergo non-surgical cosmetic procedure training prior to practice. The approved training program should consist of the following:
- 8.1.1. **Theoretical component:** Comprehensive theoretical lecture and educational materials which may include but is not limited to:
- a. Terminology
- b. Overview anatomy and physiology of the skin

- c. Skin disorders
  - d. The best practice techniques for the bespoke procedure
  - e. Patient selection criteria
  - f. Patient education and consent
  - g. Pre and post management of patients
  - h. Risks, side effects and management of side effects
  - i. Effects and use of cosmetic drugs
  - j. Documentation and medical record management
- 8.1.2. **Practical component:** A minimum of 50% of the training course program should be devoted to the development of practical skills
- 8.1.3. **Evaluation part:** by oral/practical and written exam.
- 8.2. The learning outcomes of any non-surgical cosmetic procedure training program should enable HP to:
- 8.2.1. Accurately assess an individual patient/client's needs
  - 8.2.2. Identify and explain the relevant risks of the proposed treatment
  - 8.2.3. Undertake a thorough history, including relevant past medical history and current medication, to inform the management plan
  - 8.2.4. Identify instances when treatment is not in the patient/client's best interests
  - 8.2.5. Provide a rationale for decisions to treat and not treat, and for choice of modality
  - 8.2.6. Communicate effectively and openly with patients/clients

- 8.2.7. Understand and describe the influences that can affect the choices made by patients/clients and HP about cosmetic interventions to be used
- 8.2.8. Encourage patients to use independent emotional support to foster realistic expectations, enhance safety and maximise consultation time and results
- 8.2.9. Apply the principles of evidence-based practice
  - a. Understand and describe the possible interactions between different procedures and demonstrate how to apply evidenced based practice
  - b. Use knowledge and skills to achieve optimal results and minimize the risk of complications
  - c. Recognize their own professional accountability and responsibility for delivery of procedures and manage their practice in an ethical way
  - d. Understand and explain the roles and relationships of others involved in the prescription, delivery and supervision of cosmetic intervention
  - e. Deliver the cosmetic procedure safely, effectively and to a high standard.

## **9. STANDARD FIVE: GRANTING NON-SURGICAL COSMETIC PROCEDURE PRIVILEGES**

- 9.1. The Medical Director of the health facility is responsible to ensure that:
  - 9.1.1. The degree of complexity of the procedures are within the health facility capabilities.
  - 9.1.2. The physician has the appropriate certification, training, skills and experience to provide non-cosmetical surgical procedures.

- 9.1.3. The procedures are performed with the supervision of Consultant/ Specialist Dermatologist OR Consultant/ Specialist Plastic Surgeon for GP and Nurses.
- 9.1.4. Approved dental procedures are only performed by Dentists and Dental Hygienists.
- 9.1.5. Clinical Governance shall be in place as per DHA regulation.
- 9.1.6. Clinical privileges are granted to full-time, part-time and/or visiting HP to perform non-surgical cosmetic procedures in the health facility and dental facility. (Refer to Clinical Privileging Policy)

## 10. STANDARD SIX: MEDICAL DEVICE SAFETY

10.1. Any medical device used for non-surgical cosmetic procedure shall be installed in accordance with manufacturer's instructions and be registered by the Ministry of Health and Prevention (MOHP) and be approved by at least one (1) of the following international authorities or equivalent:

- 10.1.1. Food and Drug Administration (FDA)
- 10.1.2. Health Canada (HC)
- 10.1.3. Conformité Européenne (CE)
- 10.1.4. Australian Register of Therapeutic Goods (ARTG)
- 10.1.5. Ministry of Food and Drug Safety (MFDS) Korea
- 10.1.6. Taiwan Food and Drug Administration (TFDA)
- 10.1.7. Japans Ministry of International Trade and Industry (MITI)

10.2. The Health Facility should have in place a record of medical devices testing and calibration as per manufacturer's instructions.

10.3. The Health Facility shall ensure that the device tested prior to use. A record of testing should be documented with the date of re-testing as per manufacturer's instructions.

## **11. STANDARD SEVEN: PATIENT ASSESSMENT, EXAMINATION AND INFORMED**

### **CONSENT**

11.1. The treating physician shall conduct a complete clinical and physical examination to diagnose the case and determine the treatment plan.

11.1.1. The clinical and physical examination shall clarify to the patient (or their legal guardian) the expected improvement as well as the most common side effects, risks and adverse outcomes for the procedure(s) in the short and long term.

11.2. Appropriate consent shall be obtained prior to the procedure from the patient for non-surgical cosmetic procedures performed in health facilities in accordance with UAE law and DHA regulation.

11.2.1. Patients under the age of eighteen (18) years seeking non-surgical cosmetic procedures shall not be considered for non-surgical cosmetic procedures unless it is clinically justifiable and written approval has been granted by their legal guardian.

11.3. HP should ensure information given to patients is culturally appropriate and in a language that they can understand. This may include provisions to provide access to a translator or provide information related to the procedure in a brochure or video.

11.4. A health record must be created for each patient and each session of treatment (including consent) and be documented and signed by the physician or allied HP.

## 12. STANDARD EIGHT: TREATMENT AND FOLLOW UP CARE

12.1. Health Facilities and health professionals permitted to perform non-surgical cosmetic procedures are noted in **appendix 2**.

12.1.1. Procedures that are not included in the list will be subjected to DHA authorization and approval

12.2. HP should adhere to infection control and safety precautions during and after performing non-surgical cosmetic procedure.

12.3. Infection control measures should be used in the health facility to prevent and reduce the potential for disease transmission, and include but not limited to the following:

12.3.1. Hand Hygiene

12.3.2. Personal Protective Equipment (PPE)

12.3.3. Sterilization and disinfection of patient care items

12.3.4. Environmental infection control

12.3.5. Waste Management

12.3.6. Blood-borne pathogens

12.4. As part of postoperative care, HP should educate the patient on the potential side effects and complications of the procedure.

12.5. Physicians should be able to use the proper pain management strategies for post-procedure pain control.

12.6. Health facility procedures noted in **appendix 2** should include a follow up appointment with the outcome documented in the patient record.

### 13. STANDARD NINE: DATA COLLECTION AND KEY PERFORMANCE INDICATORS

Health facilities authorized to provide non-surgical cosmetic procedure, shall keep a record of the following performance metrics for audit, inspection or reporting (exclusion beauty salon):

#### 13.1. Adverse Event

<b>Description</b>	Percentage of procedures involving adverse event within 30 days. An Adverse event is any unanticipated event in a healthcare setting resulting in injury, adverse reaction, serious physical or psychological injury or death to a patient) as result of non-surgical cosmetic procedure
<b>Type</b>	Outcome
<b>Domain</b>	Patient Safety
<b>Numerator</b>	All patients in the cohort above the age of 18, who have undergone non-surgical cosmetic procedure and have had an adverse event described in the measure description
<b>Denominator</b>	All patients in the cohort above the age of 18, who have undergone non-surgical cosmetic procedure
<b>Denominator Exclusions</b>	All patients under the age of 18, patients who are undergoing non-surgical cosmetic procedure, but it is not their primary procedure
<b>Rationale</b>	Metric of safety for non-surgical cosmetic procedure

### 13.2. Serious Complications and Emergency Referral

<b>Description</b>	Percentage of patients who have a potentially life-threatening complication associated with residual and lasting injury, disability, lower quality of life, emergency care or death
<b>Type</b>	Outcome
<b>Domain</b>	Patient Safety
<b>Numerator</b>	Rate of serious complications and emergency referral for adult patients (18 years and over) within 30 days who have undergone a planned non-surgical cosmetic procedure. Includes all related and unrelated unplanned patient face to face follow up appointments
<b>Denominator</b>	All patients in the cohort above the age of 18, who have undergone a non-surgical cosmetic procedure
<b>Denominator Exclusions</b>	All patients under the age of 18, patients who are undergoing non-surgical cosmetic procedure, but it is not their primary procedure
<b>Rationale</b>	Metric of patient safety for non-surgical cosmetic procedure

### 13.3. Planned Patient Follow Up

<b>Description</b>	Percentage of procedures that have had a follow up within 30 days. A follow up includes a planned face to face appointment with the treating healthcare provider
<b>Type</b>	Outcome
<b>Domain</b>	Patient Experience
<b>Numerator</b>	All patients in the cohort above the age of 18, who have undergone a non-surgical cosmetic procedure and have had a follow up described in the measure description
<b>Denominator</b>	All patients in the cohort above the age of 18, who have undergone a non-surgical cosmetic procedure
<b>Denominator Exclusions</b>	All patients under the age of 18, patients who are undergoing non-surgical cosmetic procedure, but it is not their primary procedure
<b>Rationale</b>	Metric of patient experience for non-surgical cosmetic procedure

#### 13.4. Patient Satisfaction

<b>Description</b>	Percentage of patients who are satisfied with the non-surgical procedure. Patient satisfaction is a measure of the extent to which a patient is content with the health care which they have received by their healthcare provider. A valid and reliable satisfaction scale should be adopted to measure patient satisfaction
<b>Type</b>	Outcome
<b>Domain</b>	Patient Experience
<b>Numerator</b>	All patients in the cohort above the age of 18, who have undergone a non-surgical cosmetic procedure who are satisfied with the non-surgical procedure described in the measure description
<b>Denominator</b>	All patients in the cohort above the age of 18, who have undergone a non-surgical cosmetic procedure
<b>Denominator Exclusions</b>	All patients under the age of 18, patients who are undergoing non-surgical cosmetic procedure, but it is not their primary procedure
<b>Rationale</b>	Metric of patient experience for non-surgical cosmetic procedure

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## APPENDICIES

### APPENDIX 1 - DHA MINIMUM CRITERIA FOR INFORMED CONSENT

1. If the patients lack the full capacity (e.g. less than 18 years old) informed consent shall be taken from their relatives up to the fourth degree, before the procedure/surgery is performed.
2. Patients shall be provided with comprehensive and accessible information concerning and procedure/surgery alternatives.
3. The health facility management shall clearly define investigations, treatment and surgical procedures that require patient consent.
4. The health facility management must develop an internal consent policy and procedures that are consistent with the federal legislation including procedures for individuals lacking the capacity of making informed decisions.
5. Informed consent form shall be maintained in the patient's health record. It should be bilingual and contain the following:
  - 5.1. Patient full name as per the passport/Emirates ID , age, gender, and patient identification number
  - 5.2. The diagnosis
  - 5.3. The name of proposed procedure or treatment
  - 5.4. The risks and benefits of proposed procedures or treatment
  - 5.5. Alternatives and the risks and benefits of alternatives
  - 5.6. Statement that procedure was explained to patient or guardian
  - 5.7. Date and time consent is obtained

- 5.8. Name and signature of the treating physician
- 5.9. Signature of a minimum one healthcare professional witnessing the consent (optional)
6. Informed consent shall be signed by the patient/guardian, witness, treating health professional, and translator if applicable.
7. All contents of the “Informed consent forms” should comply with the Decree of the Federal Law number (4) of 2016 concerning Medical Liability Law.
8. Healthcare professionals working in the health facility shall be informed and educated about the consent policy.
9. Where consent is obtained by the visiting community physician, the health facility management shall ensure that the signed consent is received and filed in the patient health record.

**APPENDIX 2 - NON - SURGICAL COSMETIC PROCEDURES BY PROFESSIONAL CATEGORIES**

No.	Type of procedure/therapy <sup>1</sup>	Consultant/Specialist Physician <sup>2</sup>	Other Physician <sup>3</sup>	Nurse	Physiotherapist	Massage Therapist	Beauty Therapist	Dentist/Dental Hygienist
1.	Blackhead and Comedone extraction	✓	✓	✓	x	x	✓	x
2.	Body shaping and cellulite reduction machines e.g. LPG, Cool Sculpting or Aqua	✓	✓	✓	✓	✓	x	x
3.	Chemical Peels (Medium, Deep, Very Deep)	✓	✓	✓	x	x	x	x
4.	Chemical Peels (Very Superficial and Superficial)	✓	✓	✓	x	x	✓	x
5.	Cryotherapy (regional and general)	✓	✓	x	x	x	x	x
6.	Ear and body piercing	✓	✓	x	x	x	x	x
7.	Electrolysis hair removal	✓	✓	✓	x	x	✓	x
8.	Fillers & Botulinum toxin injections (Botox)	✓	✓	x	x	x	x	x

<sup>1</sup> Beauty salons are permitted to perform procedure No. **1,4,7,9,11,14,15, and 19 only**.

<sup>2</sup> Dermatologist OR Plastic Surgeon and **do not** require training.

<sup>3</sup> All specialities except Consultant/Specialist Dermatologist **OR** Plastic Surgeon who require training.

No.	Type of procedure/therapy <sup>4</sup>	Consultant/Specialist Physician <sup>5</sup>	Other Physician <sup>6</sup>	Nurse	Physiotherapist	Massage Therapist	Beauty Therapist	Dentist/ Dental Hygienist
9.	Hydra-facial	✓	✓	✓	x	x	✓	x
10.	Laser hair removal and IPL	✓	✓	✓	x	x	✓ <sup>7</sup>	x
11.	Manual Lymphatic Drainage (MLD)	✓	✓	✓	✓	✓	✓	x
12.	Medical tattoos and removal of tattoos	✓	x	x	x	x	x	x
13.	Mesotherapy (injectable or Derma Rollers with length >0.5mm)	✓	✓	✓	x	x	x	x
14.	Micro-dermabrasion	✓	✓	✓	x	x	✓	x
15.	Micro-needling and Mesotherapy (topical/needless devices or Derma rollers with length <0.5 mm)	✓	✓	✓	x	x	✓	x

<sup>4</sup> Beauty salons are permitted to perform procedure No. **1,4,7,9,11,14,15, and 19 only**.

<sup>5</sup> Dermatologist OR Plastic Surgeon and **do not** require training.

<sup>6</sup> All specialities except Consultant/Specialist Dermatologist **OR** Plastic Surgeon who require training.

<sup>7</sup> **Only** in health facility

No.	Type of procedure/therapy <sup>8</sup>	Consultant/Specialist Physician <sup>9</sup>	Other Physician <sup>10</sup>	Nurse	Physiotherapist	Massage Therapist	Beauty Therapist	Dentist/ Dental Hygienist
16.	Photo-dynamic therapy	✓	✓	✓	x	x	x	x
17.	Photo-pneumatic therapy	✓	✓	✓	x	x	x	x
18.	Platelet Rich Plasma for topical application and injections	✓	✓	x	x	x	x	x
19.	Semi-permanent Makeup and Micro-blading	✓	✓	✓	x	x	✓	x
20.	Skin tightening by light-based devices such as infrared, radiofrequency, electrodes ultrasound applicators	✓	✓	✓	x	x	x	x
21.	Teeth cleaning	x	x	x	x	x	x	✓
22.	Teeth whitening	x	x	x	x	x	x	✓

<sup>8</sup> Beauty salons are permitted to perform procedure No. **1,4,7,9,11,14,15, and 19 only**.

<sup>9</sup> Dermatologist OR Plastic Surgeon and **do not** require training.

<sup>10</sup> All specialities except Consultant/Specialist Dermatologist **OR** Plastic Surgeon who require training.