



The Australian Society of Dermal Clinicians (ASDC)

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11th July 2021

Att: **Simon Critchley**

Director, Radiation Health Unit

rsreg@health.qld.gov.au

CC' **The Honourable Yvette D'ath**

Minister for Health and Ambulance Services

Re: Remake of the Radiation Safety Regulation 2010

The Australian Society of Dermal Clinicians (ASDC) is writing to provide our views in relation to the remake of the radiation safety regulation (2010) in Queensland and the draft Radiation Safety Regulation 2021.

The ASDC is the peak professional body for Dermal Clinicians and Therapists. We write this feedback as an industry body representing professional skin health practitioners that provide health services which are governed by the radiation safety regulation in QLD. This includes providing cosmetic and therapeutic (health) services using non-ionising radiation apparatus such as LASER and other light-based modalities.

In reviewing the draft we have identified areas within the regulation that directly impact on our profession. We would like to highlight these and provide our recommendations in the hopes that these points can be further considered as amendments are made to the regulation prior to implementation in September, 2021. . Some of these recommendations are currently not included in the regulation document. We are of the view that during this time it is prudent to also raise concerns relating to proposed amendments to the regulation that will negatively impact our members, as well as raise awareness of the scope of practice of Dermal Clinicians and Therapists providing cosmetic and therapeutic procedures using LASER and light-based modalities.

Schedule 6: Part 2 Authorised Persons for Therapeutic Procedures.

The regulation currently indicates that specialist medical and health professionals including medical practitioners, dentists and podiatrists only are authorized to perform therapeutic procedures with LASER apparatus. The ASDC have identified several areas for further consideration. These are amendments to the authorised persons list for therapeutic procedures, clarity of definitions of therapeutic procedures as well as the need consider further authorised persons for 'cosmetic' purposes using non-ionising light and LASER apparatus.

Amendments to the Authorised Persons List

It is the feedback of the ASDC that the authorised persons list is expanded to specifically include Dermal Clinicians and Therapists.

[The Australian Society of Dermal Clinicians is an affiliate member of Allied Health Professions Australia \(AHPA\)](#) as an emerging allied health professional body representing AQF 7 qualified health professionals operating within an evidence-based paradigm.

Dermal Clinicians are allied health professionals with an AQF 7 Bachelor of Health Science with expertise in the assessment and management of the skin in health and states of dysfunction, disorder or disease.. **As part of** their Bachelor Degree programs, Dermal Clinicians are robustly educated and trained in the scientific theory and evidence based application of non-ionising LASER and light-based modalities for skin related applications. This includes many hours of practical skills training and supervised clinical practice. Dermal Clinicians with an AQF 7 qualification can provide therapeutic management of concerns relating to skin health and appearance, as well as common skin conditions, disorders and diseases that affect the Australian population.

Dermal Clinicians are independent allied health practitioners; however, they often work collaboratively with GP's, Skin Cancer Medical Practitioners, Dermatologists, Cosmetic Physicians, Plastic Surgeons and Vascular Surgeons among others. Dermal Clinicians can independently provide (within their scope of practice) therapeutic management of the skin using non-ionising LASER and light-based apparatus. In some instances, medical professionals will refer patients to Dermal Clinicians and delegate provision of therapeutic interventions due to their theoretical and practical expertise in providing LASER and light-based procedures.

For more information on the education and training of Dermal Clinicians in the Bachelor Degree programs, you can refer to **Appendix 1 - ASDC Education Partners**. This could also further inform 'the regulation' with regard to recognised education for user licencing.

Alignment of Definitions of Therapeutic Procedures with TGA.

It is also recommended that the term 'therapeutic procedures' be more clearly defined within the regulatory framework. It is our recommendation that the term is aligned with the [Therapeutic Goods Administration Definition](#), which considers intent when using LASER or light-based apparatus and therefore allows for improved regulation of practitioners using these devices for specific applications.

By this definition, what makes something therapeutic rather than cosmetic is broadly defined as products for use in humans in connection with:

- preventing, diagnosing, curing or alleviating a disease, ailment, defect or injury
- influencing, inhibiting or modifying a physiological process

Recommendations for additions to the Authorised Persons list for Therapeutic Procedures

The ASDC would like to request that the following additions are made in consideration of Dermal Clinicians as allied health professionals performing therapeutic skin management with LASER and light-based apparatus.

- Treatment of lower limbs for cosmetic appearance of venous insufficiency including photocoagulation using non-ionising LASER apparatus.
- Treatment of lower limbs for onychomycosis or ablation of warts using non-ionising LASER apparatus.
- Treatment of dermatological conditions, wounds and scars using non-ionising LASER and light apparatus.
- Treatment of benign pigmented conditions and vascular lesions using non-ionising LASER and light apparatus.
- Cutaneous oncology applications using LASER and light apparatus under the delegation of medical professionals.
- Treatment of hair loss and hair reduction therapies associated with medical conditions using non-ionising LASER and light apparatus.

LASER and light-based modalities – cosmetic or therapeutic devices?

The ASDC would like to highlight that for public safety we feel very strongly that it is important for this regulation to capture the provision of therapy using non-ionising LASER and light apparatus for both services marketed as ‘cosmetic’ and ‘therapeutic’ purposes. In both applications, these treatments result in tissue injury responses, alteration to cellular processes and changes to skin structure and function.

For the majority of Australians, LASER and light-based procedures are considered ‘for cosmetic purposes’. As we have previously demonstrated, these techniques are also used to correct dysfunction, disorder and disease of the skin, which more closely aligns with what is considered a therapeutic procedure or health service. It is also worth noting that the technique and in many cases the apparatus used for cosmetic and therapeutic purposes are the same. It does not seem logical to separate these into cosmetic or therapeutic uses when these procedures carry the same associated risks and complications, especially when one is regulated within the framework and the other is not.

Therefore in our opinion, these therapies and procedures no longer act superficially on the skin, nor are the effects solely cosmetic, temporary and completely reversible. Currently, regulatory bodies view many LASER and light-based treatments as cosmetic procedures; however, these services are associated with greater risk of side effects and adverse events that may also be more significant and long term due to their mechanism/s of action. Therefore, these services and associated apparatus should be held to higher standards of regulation because they are a greater risk to public safety.

In summary, the ASDC advocates for safety and standards of care for consumers receiving skin therapies and the provision of therapy with an evidence-based approach. We have provided this feedback as an industry body representing professional skin health practitioners who provide therapeutic and cosmetic procedures using LASER and light-based devices. We trust that you will consider the above feedback in the review of the regulation in Queensland.

Kind regards



Jennifer Byrne

Chairperson of the Australian Society of Dermal Clinicians.

Appendix 1 - ASDC Education Partners

Victoria University (Melbourne)- [Bachelor of Dermal Science](#)

[Victoria University Dermal Clinic](#) - please review procedures performed as part of supervised clinical practice.

Australasian College of Health and Wellness - [Bachelor of Applied Health Science \(Clinical Aesthetics\)](#)

Torrens University - [Bachelor of Health Science \(Aesthetics\)](#)