



Press Release - NMC Issue Clarification on Prescribing, including prescribing non-surgical medicinal products being used for cosmetic and aesthetic purposes

Professor Geraldine Walters CBE PhD RN, Executive Director, Professional Practice at the NMC has today issued further clarification on prescribing and has made specific reference to prescribing non-surgical medicinal products being used for cosmetic and aesthetic purposes. The NMC statement is reproduced below:

‘As you know, prescribing of medications is a regulated activity, requiring high professional standards. We know that the majority of our professionals prescribe safely and effectively and in line with our standards.

At the NMC, we’re regularly asked questions about prescribing. These queries are from nurses and midwives, members of the public, and those who have concerns about prescribing practice. Often, they’re in relation to prescribing in the cosmetic and aesthetic context.

All prescribers must take individual responsibility for their prescribing decisions. As someone with a prescribing qualification, we want to help you deliver the best and safest care.

I’m writing to summarise the requirements that are relevant to your prescribing practice. I also want to highlight those that are most relevant to remote prescribing, and prescribing of medicinal products, including non-surgical medicinal products being used for cosmetic and aesthetic purposes. These requirements are set out in:

1. [The Code](#)
2. [The Royal Pharmaceutical Society \(RPS\) Competency Framework](#)
3. [High level principles for good practice in remote consultation and prescribing](#)
4. [Supporting information](#)

1. The Code



As a Midwife, we know you're mindful of the Code in everything you do.

The Code states at section 18.1 that *those suitably qualified must only prescribe, advise on, or provide medicines or treatment, including repeat prescriptions, if you have enough knowledge of that person's health and are satisfied that the medicines or treatment serve that person's health needs.*

2. The RPS Competency Framework for all Prescribers

All prescribers must prescribe in line with the RPS Competency Framework, which we've adopted as our standards of proficiency for prescribing practice.

It sets out the steps a prescriber must take before issuing a prescription. This includes:

- *taking an appropriate history (1.1)*
- *undertaking an appropriate clinical assessment (1.2); and*
- *having a full understanding of the conditions to be treated by way of prescribing medication (1.6).*

It also states that:

- *prescribers should identify the potential risks associated with prescribing remotely, and take steps to minimise them (7.3); and*
 - *minimise risk to patients by using processes that support safe prescribing in areas of high risk (7.4).*
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3. High level principles for good practice in remote consultation and prescribing

If you prescribe remotely, you should also familiarise yourself with our [High level principles for good practice in remote consultation and prescribing](#). They're underpinned by existing standards and are there to support you to deliver the safest care possible.

There are certain areas of practice where remote prescribing is unlikely to be suitable, for example, when prescribing medicines likely to be subject to misuse or abuse, or in the case of injectable cosmetic treatments. In these situations, we recommend face-to-face consultations.



The reasons why remote prescribing is unlikely to be suitable in the cosmetic context is related to the prescriber having less ability to apply the following principles effectively:

- *Understand how to identify vulnerable patients and take appropriate steps to protect them*
- *Carry out clinical assessments and medical record checks to ensure medication is safe and appropriate*
- *Raise concerns when adequate patient safeguards aren't in place.*

We encourage you to reflect on and review your practice against all of these standards and principles regularly to ensure that you continue to meet them. You should do this as part of your CPD and revalidation and seek advice if you're unsure.

Remember, if at any time you feel that public safety is being put at risk or if you're being asked to work outside of the requirements of the Code or any other national standards, you're empowered under the Code to speak up and raise your concerns (see section 16.1 of the Code for more details).

Prof. David Sines CBE, the Executive Chair and Registrar of the JCCP said: "We are pleased to note that the key issues raised in our representation to the NMC, to a range of government agencies and to the Health and Social Care Select Committee (2022) have been acknowledged in the NMC's statement today. The JCCP is of the opinion that remote prescribing in any form is unacceptable for prescription only medicines that are used for aesthetic/cosmetic purposes. The JCCP remains committed to its policy position that face-to-face consultations must be used whenever prescription only medicines are prescribed for use within this sector. The JCCP will continue to seek assurance from Professional Healthcare Regulators that they will enforce guidance to ensure that all prescribers do not perform remote prescribing in the aesthetics sector".

NOTE TO EDITORS

1. The JCCP registers practitioners and training providers with the key remit of ensuring patient safety and public protection. It has been established to assist members of the public who are considering non-surgical treatments, such as injections, fillers, lasers, peels and hair restoration surgery. It offers advice on patient safety and how to gain access to registers of approved practitioners.
2. The JCCP practitioner register operates through the Professional Standards Authority which is accountable to Parliament. The JCCP is a UK registered Charity.



3. The JCCP published a 10-point plan in 2021 for Safer Regulation in the Aesthetic Sector, https://www.jccp.org.uk/ckfinder/userfiles/files/10_point_plan.pdf

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