

Professor Frank V. Keane
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Dear Professor Keane and Mr Mealy

The Irish Medical Organisation (IMO) would like to thank you for the opportunity to comment on the Draft Model of Care for Acute Surgery. The IMO welcomes the extensive work that has been put into producing a comprehensive framework for the delivery of care to acute surgical patients. We would however like to alert you to discussions by the European Committee for Standardisation (CEN – Comité European des Normes) and the Standardisation of Aesthetic Surgery Services.

In 2010 the European Committee for Standardisation (CEN) resolved to address the standardisation of services in the field of aesthetic surgery. The foundation of this work was to establish quality requirements to ensure patient safety in this specialty, particularly given the number of issues that have resulted from cosmetic and aesthetic surgeries that have not been satisfactorily performed or have been delivered by inappropriately qualified individuals.

The CEN standard prEN 16372 attempts to harmonise technical qualifications and specialist training regulations (although this may be revised), professional duties and ethical requirements as well as treatment procedures and quality assurance mechanisms at the European level.

Standard prEN 16372 has raised considerable concern among the medical professional representative bodies at a European level.

- As this standard has been created independently from the expertise of the European medical professional representative bodies, there is a concern that this standard will create parallel structures and lead to legal uncertainty, ambiguities, conflicting legal regimes, a lack of supervision and possibly to a loss of quality in service provision.

- The distinct character of healthcare services is acknowledged in national laws as conferred to Member States by each constitution and the European medical professional representative bodies have questioned the legislative basis for the extension of CEN's remit into the standardisation of healthcare services.

Currently this proposed standard is in a state of flux, with the draft standard under revision and discussion by numerous stakeholders informing national standards authorities who are the contributing members to CEN. The IMO is contributing to this process at both at national level with the National Standards Authority of Ireland (NSAI) and at international level within our representative European Medical Organisations.

In addition the IMO would like to make the following short comments in relation to the document itself.

Permanent SHO/Registrar Grade (Pg 50) - The regularisation of SHOs and Registrars on contracts of Indefinite duration also requires negotiation and agreement with the Irish Medical Organisation.

6.2. Surgical Specialty Standards for Acute Surgical Care (Pg 78) – Surgeons in all specialties have a responsibility to ensure that medical devices chosen comply with national and/or international standards.

Yours sincerely

Vanessa Hetherington
Senior Policy Executive