

Health and Social Care Committee

Public Health (Wales) Bill

Special procedures – video evidence

The Welsh Government feel that because of the reported health risks connected to these procedures, it is important that practitioners employ safe working practices, and particularly that good infection control practices are followed at all times, so that both clients and practitioners are protected.

Answer:- to do this you must standardise procedure requirements with inside knowledge from practitioners

1. What are your views on creating a compulsory, national licensing system for practitioners of specified special procedures in Wales?

See Above : if the system is ill informed it will be pointless

It also does not address the main problem which is unlicensed practitioners

2. In what way do you think creating a compulsory, national licensing system will affect your business?

It will increase costs on an already stretched industry the legal skilled operators are being penalised for the cheap untrained or unlicensed or budget operators

This must be delivered at low cost with the fining of unlicensed operations helping fund the checks!!

A system of more regular checks should be put in place for those operating at below par

Less frequent for higher standard studios

This would prove to be more cost effective

3. In what way do you think creating a compulsory licensing system will affect standards?

It could help increase standards but only if it is well informed and efficient

Special procedures are currently defined as acupuncture, body piercing, electrolysis and tattooing, for the purposes of the Bill.

4. Do you agree with the types of special procedures included in the Bill? Do you think any other procedures should be included?

Laser tattoo removal should be removed from the remit of the HIW as it is proving to be an anti-competition issue with English studios and provides a lack of service to Welsh needs and is driving Welsh consumers to try dangerous removal practices at home and with licensed and unlicensed practitioners

This is because laser removal has become expensive in Wales due to unnecessary expensive annual licensing it is totally unreasonable to expect a tattoo studio to register as a small hospital!!! It becomes cost inefficient to offer a much needed service and drives consumers underground!

You must also include branding scarification and extreme body modification in this new bill.... Do you even know this exists?

The Bill includes a provision which gives Welsh Ministers the power to amend this list of special procedures through further laws in the future.

5. What are your views on this?

Again as long as it's done with inside knowledge and expertise all good

The Bill provides that local authorities are to be responsible for enforcing the licensing requirements, and for keeping a register of special procedures licences issued by them and premises/vehicles that they have approved. A local authority must make the information on the register open to the public.

6. Do you have any views on whether enforcing the licensing system would result in any particular difficulties for local authorities?

You must provide the local authority with industry specific training and an easy to use and understand checklist this would make the system efficient

A rating system that is published as in catering establishments with more frequent visits for low scoring studios would give incentives to improve standards but there must be some lines drawn where out of date inks needles should be removed ect

Tiger waste collections sharps bins and autoclaving practices if breached should be no go items and licenses must be temporarily suspended until issues rectified!

Do you know that we generate Tiger waste and of course the needles razors must be disposed in a sharps bin and collected by a licensed waste collector.. This does not always happen in studios

3.

If you are not a fully disposable studio you should have a vacuum autoclave I cannot see how unpackaged items and tools are allowed! All tattoo supplies and some piercing tools are now available as fully disposable options with the unknown consequence of CJD it may be only a matter of time until we are forced down the all disposable route

Good safe reprocessing of instruments is a skilled operation and easy to get wrong or misunderstand the consequences of getting it wrong are infecting clients or operators!

Of course one shot disposable needles are an industry standard but it's not clear that all studios still follow this it's only a small minority that transgress but it still happens

All reusable tips, tubes, grips and piercing tools should be carefully cleaned packaged and autoclaved

Hawk grips are not autoclaved as the tip and needle cartridge is a fully sealed unit

Tattoo machines cannot be autoclaved but they can be carefully cleaned with a hard surface wipe (I then put mine in a Uv steriliser in between clients)

Tattoo machines can be bagged as can clip cords but this can lead to more contamination especially on coil machines as contaminants are trapped in the bag as they aerosol up the tube

also bagging can lead to a false sense of security and means machines don't get cleaned properly! It's a grey area and totally impossible to legislate for! But by having a mentor program we would have a chance to pass on some good practices

There should be a cohesive policy to prevent underage tattooing this becoming more difficult as people are going to extraordinary lengths to fraudulently access under age tattooing

We could do with a one standard of to be tattooed you must have a photo ID from an approved list (to prevent fraud) they do this in New York and it works well this has to be compulsory and in law to work

At the moment we only have to believe that the person is telling the truth it's vague and woolly and puts us under unreasonable pressure

And there are STILL some tattooers that believe that they can tattoo minors with their parents consent!!! It has been illegal to knowingly tattoo anyone under 18 since 1969!!!

MOST IMPORTANT

You will never take the industry with you if you don't make some attempt to put a stop to illegal unlicensed tattooing, tattoo parties ect

Final thoughts

7. Do you believe the proposals relating to special procedures contained in the Bill will contribute to improving public health in Wales?

NO not without a full rethink of tattooing and piercing practices.

If you just do a botched nationwide licence and inspection bill it will put legal tattooing in more financial trouble in fact it could drive more people underground if licensing costs overburdens the already stretched legal practitioner the real issues are with unlicensed practitioners, tattoo parties and home kit tattooing with easily available tattooing and piercing supplies from all supply houses and eBay!!!

Also it does not address untrained tattooist setting up legal studios!

Anyone of you could set up a legal studio tomorrow with no training and cheap supplies as long as you fulfil the requirements of EH licensing!!!

In the states they have an apprenticeship licence where a mentor with at least 5 years preferable 7 years experience mentors an apprentice for two years before they can have a full licence (Most tattooists give up/go out of business before 5 years!!! The tattoo club of Great Britain won't take you as a member before 7years of licensed work)

If you come from another country I.e. England ...you have to present your licence and show 2 years of financial records to prove you have been working as a tattooist if you want to move apprenticeship you have to have a letter from your mentor, they do this in the states and it's starting to work

In the states to keep your licence you have to do an annual online first aid course and blood born pathogen (BBP) course the Red Cross do an online course for \$25

None of this would guarantee you a "good" tattoo but it would dissuade some of the idiots !!!!

You would have to give grandfather rights to those already operating but bit by bit it would start to address flyby night set ups and at least make an attempt to stop this rampant problem and hopefully slowly increase standards and limit the proliferation of these untrained studios

Hope this helps if you need to clarify anything or have any part of good tattoo practice demonstrated or explained let me know