

# Auckland Regional Public Health Service

Rātonga Hauora ā Iwi o Tamaki Makaurau



Working with the people of Auckland, Counties Manukau and Waitemata

## MEMORANDUM

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From: Dr Sheryl Jury, Medical Officer of Health, Auckland Regional Public Health Service

Date: 25/01/08

Subject: **Comment on proposed 2008 update of Skin Piercing Bylaw**

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Hello Louise

Thank you very much for the opportunity to comment on proposed 2008 update of Auckland City Council's Skin Piercing Bylaw. I note for the most part it is very similar to the existing bylaw (PART 17). We have included in this reply some suggestions on wording and detail, included other reference material you may like to link to and finally, highlighted work occurring nationally (which we assume Auckland City Council is already aware of or involved with)<sup>1</sup>.

### **Changes/Inclusions/ Questions**

#### **Age restriction 17.4.3**

We noted that this requires people under the age of 18 to have written parental or guardian consent (except if over age 16 for piercing of ears, navels or nostrils). This may be out of step with the Care of Children Act 2004, section 36, Consent to Medical Procedures, which sets the age of autonomous informed consent for a young person at 16 yrs.

#### **Written consent 17.4.4, 17.4.5 and 17.4.8**

In 17.4.4 consideration could be given to having a written questionnaire that the person has to fill in and sign about disclosing communicable disease, which would also help with documentation around consent. Under 17.4.5 it suggests the operator may require written consent before carrying out a procedure. We recommend that for the operator's own protection it would be prudent to have a written questionnaire about the conditions of concern outlined in 17.4.4, written advice about procedural risks and a simple consent form, all of which the client is required to sign.

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<sup>1</sup> Note: issues pertaining to the details of sterilisation of tools or disinfection have not been commented on as these are not our areas of expertise.

17.4.8 b. (p. 8) The wording of this section could be simplified to emphasise that the person undergoing the piercing should be given written information as to the risks, what to look out for in terms of complications and steps to take should they become concerned. As an example, in the previous bylaw where this requirement was made, particularly in the tattooing section, the expectations of the person carrying out the process were much clearer.

*17.9.1 - on completion of any tattoo or part of a tattoo the person undertaking the tattoo shall provide to each customer suitable approved written instructions for the subsequent care of the tattoo to lessen the chance of infection.*

## Precautions

17.4.7 There is reference to taking ‘adequate precautions’ to prevent the transmission of communicable disease. It would be useful to include a reference to the recognised “universal precautions” for dealing with body fluids to prevent the transmission of blood borne infections in particular.

## Retention of records

17.4.9 states that records should be kept for a minimum of two years. This was set at three years in the previous version. Health records need to be kept for minimum of ten years under the Health (Retention of Health Information) Regulations 1996. While we accept these may not be health records per se, we query the rationale by which the record retention period has been reduced.

## Conduct: personal hand hygiene/hand washing

17.8.1 b (p. 14) We recommend the inclusion of specific parameters for hand washing and drying ( as per table below):

*Thoroughly cleanse his or her hands by washing with soap or antibacterial cleansing agent, including brushing his/her hands and nails when necessary for a minimum of 20 seconds and then drying them with a single service towel or other approved hand-drying equipment*

Recommended drying methods and times

Drying method	Recommended protocol	Total drying time	Comments
Single use paper towel	Dry hands using two paper towels for 10 seconds. Use another two towels and dry again for a further 10 seconds.	20 seconds	Preferred. The first drying period removes most of the water, the second finishes drying.
Single use cloth (roller) towel	Dry hands for 10 seconds on a clean section of towel. Repeat once more using a clean section of towel.	20 seconds	Not recommended, cloth towels must be freshly laundered and unused to hygienically dry the hands. May lead to cross contamination if towels reused.
Hot air dryers	Dry until hands are completely dry. Drying hands first with paper towels and finishing with hot air dryer has been shown to be the most effective method of hand drying.	45 seconds	Not recommended, noisy, slow, and ineffective unless hands completely dried.

17.8.1 f ( P.g 15) Eye protection - include the possibility of splashes of blood/ body fluids.  
*Eye protection/face shields should be worn at all times when performing procedures where aerosols or splashes of blood or body fluids may occur*

### **Disposal of towels/gloves etc.**

17.8.3 Current wording suggests that linen and disposable gloves would be placed into the same lidded container after use. This may then require someone sorting the linen from disposables at a later time, exposing them to possible risk. We suggest inserting the word 'separate' so the phrase reads 'shall be placed into separate disposable/non disposable lidded containers after use'.

### **Electrolysis**

17.10.3 Just a query whether a person with hearing aids cannot just take them out before electrolysis to save them the cost of obtaining a letter of approval from their doctor (as opposed to a pacemaker which clearly cannot be removed)?

### Other Reference Material

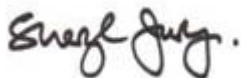
A reference to the Ministry of Health's 1998 'Guidelines for the Safe Piercing of Skin' could also be included as it is a valuable resource for operators.

<http://www.moh.govt.nz/moh.nsf/pagesmh/4169?Open>.

### Ongoing National Work

The Ministry of Health is currently running a project looking into the safety of Pacific (particularly Samoan) traditional tattooing practices. Peter Aiono is our representative on this if you would like any further information and I understand he keeps Ole Maiava informed of progress. Hopefully specific recommendations about the sterilisation of traditional tattooing instruments (and advice around tradition tattooing regulation) will be forthcoming from this group. Under Peter's guidance ARPHS has recently produced pamphlets in Samoan and English on what to expect for people undergoing traditional tattooing, let me know if you would like some copies or if there are any hui/meetings at which we can assist with the dissemination of information.

Kind regards



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