



29th May, 2015

To whom it may concern,


**RE: Consultation Cosmetic Medical and Surgical Procedures**

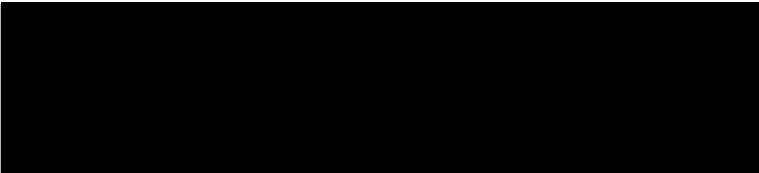


Over the years, I have worked with numerous cosmetic and plastics surgeons and had the opportunity to witness their prescribing practices. I have also been involved in implementing and monitoring the telemedicine consultation and prescribing service within my clinics. I believe our telemedicine practices are superior to the broad industry, as we have strict protocols in place and no S4 medications are permitted to be administered without a telemedicine consultation between an experienced doctor and the patient and the provision of a valid and current Australian prescription.

In contrast, I have observed clinics owned by my prestigious fellow plastic surgeons, where employed nurses perform injectables without the consultation of the doctor (because we are scrubbed and performing operations in a surgical theatre), and the doctor provides a script retrospectively, without ever having consulted with the patient. We also have direct patient reports that the patient has previously had S4 drugs injected by nurses working from home at commercially unrealistic prices. Those clients report never consulting with a doctor. We believe they are working with illegitimate or stolen products and certainly not under the supervision of a doctor.

I believe telemedicine as it relates to the cosmetic industry is safe and preferable for the following reasons:

- The patient is consulted by an experienced nurse specially trained in the cosmetic field;
  - A Doctor is consulted for every new patient regarding the appropriateness of the proposed cosmetic management, whereby both doctor and patient are able to visually converse and both ask and answer any relevant questions. The Doctor is able to satisfy themselves of the safety and appropriateness of the treatment plan and prescribe the appropriate S4 medication;
  - We have an extensive consent process whereby the patients are advised of the various risks associated with the procedure and have the opportunity to ask questions or to withdraw from the treatment;
  - In our franchise, the nurses must partake in mandatory clinical training and be deemed to be competent and safe. They also have strict dosage and drug preparation guidelines, which they are contractually bound to adhere to;
  - We have protocols for dealing with immediate and longer term complications and have an extensive computerised adverse reaction reporting and follow up system;
  - This provides the patients a greater choice of quality injectables' services and minimises the need to attend more illegitimate service providers;
  - All our medications (Botulinum toxins and hyaluronic acid fillers) are temporary in their effects and will reverse even without further treatment in due course;
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I believe that preventing telemedicine consultations in the cosmetic industry should be avoided for the following reasons:

- Nurses with many years experience of safe injecting will be out of work and given the current economic climate, their employment options are limited, placing a burden on every taxpayer;
- Some nurses may be tempted to work from home, away from medical supervision and standardised safety practices;
- Existing practices such as the ones observed by myself of my plastics colleagues will not change and as a result, there will be reduced doctor consultations across the industry; and
- Providing a face-to-face Doctor consultation and face-to-face supervision of nurses is unrealistic as it is economically unviable for the Doctors to work at reduced wages or the clinic to afford an appropriate Doctor's wage. In the rare case that Doctors could be found, then this would add to the cost of the service across the board in an already difficult market for both providers and consumers.

In summary:

- Appropriately trained nurses, practicing within written guidelines and protocols, under the remote supervision of medical practitioners accessible via telemedicine consultation is a safe system for the provision of short term acting and reversible S4 cosmetic drugs;
- AHPRA could look into ways of preventing the illegitimate access of S4 drugs by nurses and performing unsupervised procedures, as I believe this is where the true risks are in the cosmetic industry. Perhaps a patient education campaign that highlights the need to have a consultation with a Doctor and to avoid practitioners working outside of a business or practice might allow the eradication of such practices.

Yours sincerely,

