

Clinica-Lase Cosmetic Clinic
220 Elgin Street, Carlton
VIC 3053

17th May 2015

AHPRA Medical Board

Dear Sir/Madam,

It is with great concern and disappointment that I write in relation to the proposed changes to the regulatory guidelines for registered medical practitioners who provide cosmetic medical or surgical procedures. Most of the proposals are sensible for example mandatory cooling off periods for major cosmetic procedures such as breast augmentation and guidelines on patient consent, both of which could help to address understandable concerns. What appears to be totally out of place is the proposal to insist on face to face consultations for prescribing schedule 4 cosmetic injections.

As the owners of a professional high quality Melbourne clinic who offers cosmetic injections to our customers, we are a bit baffled as to why this might be deemed necessary. We have an outstanding nurse injector at the clinic who has over 10 years of dedicated injecting experience including 5 years in a prestigious London Harley Street clinic. We also have a doctor affiliated with the clinic who is available to answer any questions and see patients as required but does not practice out of the clinic directly. We therefore utilise video conferencing to perform joint 3-way consultations between the nurse, the doctor and the patient. This is a thorough, professional process which involves discussing the reasons for wanting the treatment, the alternatives, the risks and the possible side effects. Our customers are extremely happy with this arrangement as it means they do not have to visit a GP to obtain a prescription. We repeatedly get told that they do not want to go to a doctor for their cosmetic injections either as they feel the all-round service they get from a dedicated clinic like ours is superior. Basically, this is a process that works and most importantly it is what the customer wants.

Interestingly, the following quote was included in the recent AHPRA press release:

'We want to do what we can to keep the public safe, without imposing an unreasonable regulatory burden on practitioners,' Dr Flynn said.

Removing the option to hold video conferencing consultations for cosmetic injections would be doing the exact opposite of this quote – that is it would be introducing unreasonable regulation that the public don't want or need.

If there are establishments out there who are not offering an adequate service to the public with respect to cosmetic injections then this should be tackled directly, not by removing an entire service that punishes clinics like ours who uphold their duty of care to the customer and provide safe, well informed services in a modern, spacious and clean environment. Moreover, if implemented, this proposal would be punishing our many happy customers who have told us they simply do not want this regulation to go ahead.

Yours sincerely

Marc Walker
Director
Clinica-Lase Cosmetic Clinic