



7 March 2024

Ahpra
GPO Box 9958
Melbourne VIC 3001
Via email:

Dear Australian Health Practitioner Regulation Agency and National Boards,

Re: Public consultation - Regulation of health practitioners who perform and who advertise non-surgical cosmetic procedures.

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Health Practitioner Regulation Agency (Ahpra) and the National Boards for the opportunity to provide a submission to the draft Regulation of health practitioners who perform and who advertise non-surgical cosmetic procedures consultation.

While general practitioners (GPs) are not intended to be captured under the guidance and not specifically listed in the *Draft Guidelines for registered health practitioners who perform non-surgical cosmetic procedures (Attachment B)*, there are some aspects of the guideline that may unintentionally impact GPs and the necessary procedures they undertake in their practice. This may be particularly the case for GPs who practice in regional, rural or remote areas, and who may have a wider scope of practice depending on the availability of non-GP specialist services.¹

We provide the following comments for your consideration:

Definitions (page 6)

The RACGP has concerns the draft guideline may unintentionally impact GPs and some mainstream general practice activities such as treatment of warts and skin tags and removal of unsightly but benign pigmented lesions. Whilst we believe these procedures would be considered 'clinically justified' under the definitions and therefore fall outside the scope of the guidelines, the inclusion of a detailed guideline scope at the start of the document will be helpful for all health professionals and practitioners.

Recommendations:

- Include a detailed guideline scope within the definition section, with a clear statement that the recommendations do not refer to and will not impact mainstream general practice activities and procedures, such as common minor surgeries, and non-surgical procedures commonly undertaken by GPs.
- Include a list of the common cosmetic procedures covered and not covered in this guideline.

Item 3. Patient consultation type (p29)

A visual assessment of the patient prior to non-surgical cosmetic procedures is appropriate given the aim of cosmetic procedures is a **visibly altered outcome**.

However, allowing prescribing of injectables by video still presents a high level of risk and leaves the door open to medical companies profiteering from online dispensing of injectables.

Recommendation: Remove the option for a video consultation for prescribing cosmetic injectables.



Item 4. Additional responsibilities when providing non-surgical cosmetic procedures for persons under the age of 18 years

Further clarification is needed regarding section 4.4, page 30 - *The registered health practitioner should, to the extent that it is practicable, have regard for the views of a parent or guardian of the patient under 18 years, including whether the parent or guardian supports the procedure being performed.*

Recommendation: Next steps (if any) should be clearly stated, should the parent or guardian do not support the procedure being performed (for example, referring for an independent second medical opinion).

The RACGP thanks Ahpra and the National Boards for the opportunity to provide this submission. For any enquiries regarding this submission, please contact Stephan Groombridge, National Manager, eHealth, Quality Care & Standards on 03 8699 0544 or stephan.groombridge@racgp.org.au.

Yours sincerely

Dr Nicole Higgins
President

References

1. The Royal Australian College of General Practitioners. 2022 RACGP curriculum and syllabus for Australian general practice. East Melbourne, Vic: RACGP, 2022.