

1. Is the guidance in the draft shared practice guidelines appropriate? Why/why not?

Yes, it is appropriate that these shared practice guidelines be produced for the protection and safety of the general public, by ensuring transparency and clear communication of expectations and possible alternatives by health practitioners to their patients.

2. Does the guidance in the draft shared practice guidelines sufficiently inform registered health practitioners about National Boards' expectations when performing non-surgical cosmetic procedures in Australia? Yes/No. If no, what needs to be changed?

Yes, the guidance appears clear, and nothing needs to be changed.

3. Is the guidance in the draft shared practice guidelines useful for the public to understand National Board's expectations of registered health practitioners who perform non-surgical cosmetic procedures in Australia? Yes/No. If no, what would be more helpful?

Yes, the shared practice guidelines are useful for the public however the co-production of a overview summary and frequently asked questions handout, with input from consumers is recommended.

4. Is there anything you believe should be added to or removed from the definition of non-surgical cosmetic procedures as it currently appears in the draft shared practice guidelines? What change do you propose and why?

Yes, the use of radio frequency devices (for skin tightening) and microneedling (to stimulate collagen production) should also be listed in the definition of non-surgical cosmetic procedures. Lash and brow treatments including off label prescribing of scheduled and non-scheduled lash extension products should be clearly included in the definition of non-surgical cosmetic procedures.

5. The draft shared practice guidelines propose a set of consistent requirements for practitioners practising in this sector. Do you think it's appropriate for consistent requirements to apply to all practitioners practising in this sector regardless of their profession? Or do you think there are variations, additions or exclusions required for a particular profession or professions? What changes do you propose and why?

Yes, shared guidelines that apply to any registered health practitioner performing non-surgical cosmetic procedures are appropriate, as long as it is clear they must have the appropriate training, skills and competence.

The guidelines apply to optometrists wishing to perform intense pulse light therapy (IPL), radiofrequency skin tightening, injectables and other ocular procedures for cosmetic reasons, noting that many treatments performed by optometrists for non-cosmetic indications such as

meibomian gland dysfunction, ocular rosacea, chalazion, ptosis, blepharospasm, and evaporative dry eye disease are excluded from these guidelines.

6. While it is acknowledged that many people who seek non-surgical cosmetic procedures do not have an underlying psychological condition such as body dysmorphic disorder (BDD), the Medical Board of Australia's practice guidelines and the Nursing and Midwifery Board of Australia's proposed guidelines require medical practitioners and nurses who perform the cosmetic procedure or prescribe the cosmetic injectable, to assess their patients for underlying psychological conditions, such as BDD. Is this a reasonable requirement of other registered health practitioners performing procedures as well? If yes, why? If not, why not?

Yes, the requirement for registered health practitioners perform non-surgical cosmetic procedures to assess their patients for underlying psychological conditions such as BDD is reasonable. This is particularly relevant in the case of potentially vulnerable patients including children. In addition, it seems appropriate to not require that a validated screening tool be used by other registered health practitioners but rather request that registered health practitioners organise a referral for further evaluation as appropriate.

7. Is there any further detail that needs to be included in the draft shared practice guidelines to ensure public safety? If yes, please provide details.

No. Nothing further to add.