



Q1.

Introduction

The Nursing and Midwifery Board of Australia (NMBA) and Australian Health Practitioner Regulation Agency (Ahpra) are consulting on the proposed **Guidelines for privately practising nurses**. We welcome feedback from organisations, registered health practitioners and the public.

The questions in this consultation relate to the proposed proposed ***Guidelines for privately practising nurses***.

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Q34. **Guidelines for privately practising nurses**

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- ☒ Yes
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They can sometimes contradict and arent very cleaf. E.g stating that injectables eludes to S4 medication is not necessarily true. You may be offering PRP, which is not utalaing S4.

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Clarity on before and afters, advertising in general is still vague and not clear

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It's misleading. Consumers aren't aware of what services we provide to begin with. This creates a cycle effect of people attending to consulting without understanding what we even offer to begin with.

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It has affects on our branding, the way we market ourselves as private practicing nurses and Dosent build a clear image of our services

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I practice as Cosmetic Dermatology NP (Clinic owner) who also has qualification in general dermatology apart from general medical and medical cosmetic. I think that to mention (add) this area that I do would be fair and well-deserved recognition. I uphold the public safety and ensure what I practice in line with evidence-based cosmetic dermatology practice.

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☐ No

Q56. Please explain why

There are many safe RNs, NPs who own the clinics and practice their dermatology works and medical cosmetic with high safety and efficacy standards, therefore, they deserve to maintain their valuable positions as a clinic owner who uphold their high standards. Especially, NPs should be empowered and not to be discredited from having autonomy in this area. As long as NPs are adhering to the AHPRA regulations, I think we should give them credit, never take the right to be independently (of course in collaboration when needed with other medical professionals) practicing as "Privately practising nurses" NPs and RNs will adhere to the new regulations as long as it is fair, not because the doctors or other health professionals being malicious trying to decrease NPs' autonomy. NPs, Medical Practitioners and other health professionals need harmony with focusing on working together for best patient outcome. Nothing else.

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My fear is that they are doctors who are malicious who intended to report NPs or RNs in order to discrediting unfairly so that they are unable to be privately practicing nurses. I think they need to adopt a non - malificent act and focus on us as a whole medical healthcare providers who have the same mission for best patient outcomes. Please do not get me wrong with me, but this is real actions that have been in the healthcare. Please keep this confidential. Thank you. Empowering each other who deserve it is the best act in the healthcare system. Of course within good reasons.

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- ☐ Yes - publish my submission **without** my organisation name
- ☒ Yes - publish my submission **without** both my name and organisation name
- ☐ No - **do not** publish my submission

Q34. **Guidelines for privately practising nurses**

Q32. 1. Is the content of the proposed revised guidelines helpful, clear and relevant?

- ☒ Yes
- ☐ No

Q33. Please explain why

This question was not displayed to the respondent.

Q35. **Guidelines for privately practising nurses**

Q36. 2. Is there any content that needs to be changed, removed or added in the proposed guidelines?

☐ Yes

☒ No

Q37. Please provide details

This question was not displayed to the respondent.

Q40. **Guidelines for privately practising nurses**

Q38. 3. Would the proposed guidelines result in any potential negative or unintended effects for people requiring healthcare, including vulnerable members of the community who may choose to access PPN services?

☐ Yes

☒ No

Q39. Please explain why

This question was not displayed to the respondent.

Q41. **Guidelines for privately practising nurses**

Q42. 4. Would the proposed guidelines result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples?

☐ Yes

☒ No

Q43. Please explain why

This question was not displayed to the respondent.

Q44. **Guidelines for privately practising nurses**

Q45. 5. Would the proposed guidelines result in any potential negative or unintended effects for PPNs?

- ☐ Yes
- ☒ No

Q46. Please explain why

This question was not displayed to the respondent.

Q48. **Guidelines for privately practising nurses**

Q55. 6. Are there any other potential regulatory impacts that the NMBA should consider? (refer to the NMBA statement of assessment at Appendix B)

- ☐ Yes
- ☒ No

Q56. Please explain why

This question was not displayed to the respondent.

Q54. **Guidelines for privately practising nurses**

Q47. 7. Do you have any other feedback on the proposed guidelines?

- ☒ Yes
- ☐ No

Q52. Please provide details

Viewing nurses who work in a cosmetic field as professionals with suitable credentials, skills and critical thinking will ensure the longevity of our profession

Q53. Thank you for your submission to the Nursing and Midwifery Board of Australia (NMBA) regarding the proposed **Guidelines for nurse practitioners privately practising nurses**. The NMBA will review and consider all feedback received before finalising the guidelines. (upon completion of the survey there is an option to save a copy of your responses for your records)

Should you have any questions please contact nmbafeedback@ahpra.gov.au. Once again we thank you for taking time to provide feedback.



Q1.

Introduction

The Nursing and Midwifery Board of Australia (NMBA) and Australian Health Practitioner Regulation Agency (Ahpra) are consulting on the proposed **Guidelines for privately practising nurses**. We welcome feedback from organisations, registered health practitioners and the public.

The questions in this consultation relate to the proposed proposed ***Guidelines for privately practising nurses***.

Please read the [public consultation paper](#) before responding. All questions are optional, and you are welcome to respond to any you find relevant, or that you have a view on. It will take approximately 15 minutes to complete this survey if you answer all questions. (upon completion of the survey there is an option to save a copy of your responses for your records) The consultation is open for 6 weeks. The submission deadline is close of business **12 April 2024**.

How do we use the information you provide?

The consultation is voluntary. All data collected will be treated confidentially and anonymously. Data collected will only be used for the purposes described above. We may publish data from this consultation in internal documentation and any published reports. When we do this, we ensure that any personal or identifiable information is removed. We do not share your personal information associated with our consultations with any party outside of Ahpra except as required by law. The information you provide will be handled in accordance with [Ahpra's Privacy Policy](#).

Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published. We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details. We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include published experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982 (Cth)*, which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or

part of it as confidential. **Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

If you have any questions, please contact the [Nursing and Midwifery Board of Australia](#).

Please click on the ARROW below to start the survey.

The NMBA and Ahpra acknowledge the Traditional Owners of Country throughout Australia and their continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and Elders past and present.

Q46. Are you completing this submission on behalf of an organisation or as an individual?

- ☐ Organisation
- ☒ Individual

Q47. Your details

Name

Organisation

Email

Q49. **Publication of your submission**

Q48. Do you give permission for your submission to be published?

- ☐ Yes - publish my submission **with** my name / organisation name
- ☒ Yes - publish my submission **without** my name
- ☐ Yes - publish my submission **without** my organisation name
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Q32. 1. Is the content of the proposed revised guidelines helpful, clear and relevant?

- ☐ Yes
- ☒ No

Q33. Please explain why

It's general and doesn't yet show how restrictive you're about to make things.

Q35. **Guidelines for privately practising nurses**

Q36. 2. Is there any content that needs to be changed, removed or added in the proposed guidelines?

☐ Yes

☒ No

Q37. Please provide details

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Q38. 3. Would the proposed guidelines result in any potential negative or unintended effects for people requiring healthcare, including vulnerable members of the community who may choose to access PPN services?

☒ Yes

☐ No

Q39. Please explain why

I find nurses generally act within their scope. Restricting their activities may leave a gap in healthcare that these nurses were filling.

Q41. **Guidelines for privately practising nurses**

Q42. 4. Would the proposed guidelines result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples?

- ☐ Yes
- ☒ No

Q43. Please explain why

This question was not displayed to the respondent.

Q44. **Guidelines for privately practising nurses**

Q45. 5. Would the proposed guidelines result in any potential negative or unintended effects for PPNs?

- ☒ Yes
- ☐ No

Q46. Please explain why

Potential loss of income due to rule changes

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- ☐ Yes
- ☒ No

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☒ No

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