

# Health Service Permits for cosmetic procedure clinics

Cosmetic procedures utilising anti-wrinkle treatments and dermal fillers are popular in Australia. Increasingly these medical procedures are being delivered outside traditional medical practices, such as at beauty clinics.

The term “cosmetic injections” includes dermal fillers such as collagen, hyaluronic acid and polylactic acid as well as botulinum toxin (Botox™, Dysport™). All these products are classified as Schedule 4 (prescription only) medicines under the [Medicines and Poisons Act 2014](https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrtitle_13171_homepage.html) (the Act).

Cosmetic injections can result in serious unwanted effects. Vascular occlusion, skin necrosis and blindness are rare, but known, complications and require urgent medical intervention to reduce the risk of long-term effects. Other serious adverse effects include haematomas (which may require hospital treatment), infections, inflammatory reactions, disfigurement/scarring and muscle weakness. There is evidence that the risk of complications is greater where care is provided by inexperienced practitioners, including those without specific training in this area of practice.

## Who can prescribe and administer cosmetic injections?

Because they are prescription medicines, cosmetic injections must be prescribed by a medical practitioner, nurse practitioner (consistent with their advanced nursing practice experience) or a dentist. Dentists can only prescribe cosmetic injections for the purpose of [dentistry](https://www.dentalboard.gov.au/Registration-Standards/Scope-of-practice-registration-standard.aspx).

The Medicines and Poisons legislation requires these injections be administered to the patient by an authorised health professional, such as the prescriber or a registered nurse.

Registered health practitioners prescribing and administering cosmetic injections must also ensure they adhere to any requirements of their registration board and practice within their personal competence and scope.

## When is a Health Service Permit required?

Under the Medicines and Poisons legislation, authorisation is required to purchase and store Schedule 4 medicines for administration to patients. Individual prescribers are authorised, through their professional authority, to purchase medicines to treat their own patients. However, if purchase of the medicines is under a business name (rather than under the prescriber’s personal name) or the medicines are to be used by multiple prescribers, a Health Service Permit is required.

## Which application form to use?

A specific [Cosmetic Procedure Clinic application form](https://ww2.health.wa.gov.au/Articles/A_E/Application-forms-for-Licences-and-Permits) is available for businesses which focus on cosmetic procedures, including cosmetic injections. This application form collects the information the Department requires to assess whether the applicant can meet the requirements of the Medicines and Poisons Act 2014.

Medical clinics providing comprehensive care, which may include use of cosmetic injections, where a medical practitioner is on site whenever patient consultations and treatments are being provided, should apply for their Health Service Permit using the [Medical/Dental Practice application form](https://ww2.health.wa.gov.au/Articles/A_E/Application-forms-for-Licences-and-Permits).

Dentists wishing to use prescription medicines, which may include cosmetic injections, within their dental practice, should also apply using the [Medical/Dental Practice application form](https://ww2.health.wa.gov.au/Articles/A_E/Application-forms-for-Licences-and-Permits).

## Who can hold a Health Service Permit for a cosmetic procedure clinic?

Health Service Permits for cosmetic procedure clinics will only be issued to a medical practitioner or a nurse practitioner. Nurse practitioners must be able to demonstrate their advanced nursing practice experience is clinically relevant to treating patients with cosmetic injections. This policy supports the applicant being considered a “fit and proper person to be involved in each relevant activity” related to the medicines on the permit, as required by Section 41 of the Act.

The permit holder does not have to be an owner of the business. However, they must have authority within the business to approve policies and procedures relating to the ordering, storage, prescribing, administration and recording of the medicines on the Health Service Permit.

If the application is for a partnership or corporate type permit (rather than an individual on behalf of the business), details of the medical practitioner or nurse practitioner responsible for the overall management of cosmetic injections at the business is required. Commonly these health practitioners will be the medical director or director of clinical services.

Where multiple premises will be listed on a permit issued to an individual prescriber on behalf of the business, a registered nurse, who routinely works at a premises, may be nominated as the responsible person for that premises. This person manages the day to day ordering, receipt, storage and use of the medicines at that premises and is a contact person for the Department.

## What are the permit holder’s responsibilities?

The permit holder must ensure the medicines on the permit are procured and handled in accordance with both the Medicines and Poisons legislation and any conditions on the permit. Even where someone else is nominated as responsible for a specific premises, the permit holder remains the responsible person under the Medicines and Poisons legislation.

This includes ensuring all locations at which the medicines will be administered to patients meet professional standards for premises used for medical procedures. In particular, premises must meet the [Royal Australian College of General Practitioners Infection prevention and control standards](https://www.racgp.org.au/running-a-practice/practice-standards/standards-for-other-health-care-settings/view-all-health-care-standards/infection-prevention-and-control) (Chapters 1 to 3). Domestic premises are unlikely to meet these requirements.

All permits are subject to compliance audits by the Department of Health. Following an audit, completion of any actions notified by the Department is the responsibility of the permit holder.

## For more information

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