Protecting patients from adverse health effects caused by injectable cosmetic procedures

Advice for health practitioners

What is the issue?

The practice of delivering injectable cosmetic procedures such as dermal fillers in beauty clinics is on the increase. The death of a patient who underwent this procedure in Sydney in 2017, has highlighted the risks associated with these treatments, in particular the potential for harm and unwanted side effects from the drugs used in these procedures.

These risks exist generally but particularly wherever cosmetic injections are administered by anyone other than a registered health practitioner and without the appropriate oversight of a suitably registered medical practitioner. Even registered health practitioners should have relevant experience in relation to the risks and side effects associated with these drugs.

This fact sheet has been developed to provide health practitioners and individuals working in the beauty industry with an understanding of the risks and responsibilities related to this practice so they can work together to protect their patients.

What are the most serious side effects?

In addition to deaths reported both in Australia and overseas, serious or commonly reported unwanted effects related to dermal fillers include:

- vascular occlusion, skin necrosis, blindness or a cerebral vascular accident (CVA) – any of which could occur shortly after an injection has been administered; and all of which would require time-critical (urgent) 'reversal' treatment by a medical practitioner or nurse practitioner to reduce the risk of death or long-term complications.

Additional adverse effects include:

- delayed complications (e.g. late presenting vascular occlusion, infection)
- haematoma (a collection of blood under the skin or in the deeper tissues) that can compromise the surrounding tissues or facilitate infection and can require hospital admission and surgical drainage to correct
- infection of an implanted filler which could require intravenous antibiotics and surgical reversal/removal of the filler to treat
- inflammatory reactions, especially associated with unregistered dermal filler products which may require surgery to remove
- permanent disfigurement and scarring
- weakness of the muscles of the face, head and neck, undesirable effects on swallowing, vocal cord function and eye movements (double vision).

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Who can legally administer these drugs?

Drugs used in cosmetic procedures such as botulinum toxin and dermal fillers, containing hyaluronic acid, are classified as 'prescription-only' (Schedule 4) medicines.

The only registered health practitioners who can lawfully authorise the administration of these injectable cosmetic drugs are medical practitioners, and in limited cases, nurse practitioners and dentists.

Most nurses are **not** nurse practitioners and therefore cannot lawfully authorise the administration of the previously-noted injectable cosmetic drugs.

Nurses may only administer 'prescription-only' medicines when authorised to do so by a suitably registered medical practitioner or nurse practitioner who has taken responsibility for the care and treatment of a specific patient.

A nurse practitioner, whose registration includes a perioperative care notation, is authorised to possess and administer botulinum toxin and dermal fillers containing hyaluronic acid but **only** in the lawful practice of his or her profession in relation to the perioperative care category of nurse practitioner.

Anyone not registered as a health practitioner is not generally authorised to possess or administer 'prescription-only' medicines.

It is an offence for a medical practitioner to supply 'prescription-only' medicines to a nurse for administration unless supply is for the medical treatment of a patient under the medical practitioner's care and the medical practitioner has taken all reasonable steps to ensure a therapeutic need exists for that medicine. Unlawful supply may result in prosecution.

How are the risks to individual safety increased?

Risks associated with the administration of injectable cosmetic drugs may be exacerbated for a number of reasons.

These include:

- the patient not being properly advised of the risks by a suitably qualified medical practitioner, nurse practitioner(within the practitioners scope of practice) or dentist (in limited circumstances associated with dental treatment)
- the drugs and injections used being illegally imported or out of date
- the practices and knowledge of the person administering the treatment being insufficient
- the location where the procedures are carried out being dirty, unhygienic or otherwise inappropriate
- after care not being either suitably provided or managed.

Any of these risks can put a person's health at risk of complications, which can be life-threatening.

How can the risks be reduced or prevented?

The most important measure is to ensure these procedures are only carried out by appropriately qualified and authorised individuals.

Additionally:

- Patients should always receive face-to-face advice (in person or via video-link) from a suitably experienced medical practitioner or nurse practitioner who can explain the procedure and the risks.
- Patients should always be advised of the risks associated with the treatment. Those risks should never be downplayed and patient concerns should be responded to fully before any treatment is given.
- All administered drugs must be approved for use in Australia and comply with quality checks.
- The location at which the drug is injected must satisfy the appropriate standards of hygiene and professional conduct (for example, administering prescription-only injections in hotels or residential settings at so-called 'Botox parties' may be problematic).

- Care should be taken when administering from multi-dose containers to prevent cross-contamination and blood borne virus transmission (e.g. Hepatitis C or HIV) between patients.
- Appropriate medical treatment should be readily available in the event of serious side effects, which could require urgent resuscitation or reversal of filler treatments in the event of life, vision or skin threatening complications.
- Appropriate medical aftercare should always be provided, to ensure patients are not forced to seek corrective assistance from other practitioners.

Further information

Check if a provider is a registered practitioner at:

http://www.ahpra.gov.au/registration/registers-of-practitioners.aspx

Guidelines for Registered Medical Practitioners Who Perform Cosmetic Medical and Surgical Procedures

http://www.medicalboard.gov.au/Codes-Guidelines-Policies/Cosmetic-medical-and-surgical-procedures-guidelines.aspx

Fact Sheets for Health Practitioners Regarding Possession, Supply, Administration, Records and Storage of Scheduled Medicines

https://www2.health.vic.gov.au/public-health/drugs-and-poisons/documents-forms-print-or-download

Patient Complaints

Issues relating to cosmetic procedures may be dealt with by different organisations or government departments depending on the nature of the complaint. The table below provides information to help guide patients to the appropriate organisation or government department. If patients are not sure which is the correct organisation or department, any one of them can assist and advise who to speak to about a complaint.

Government Body	Nature of Complaint	Contact Details
Health Complaints Commissioner (HCC)	Complaints about a health service or a health service provider Complaints about general health service providers (i.e. providers not regulated by AHPRA) offering cosmetic procedures.	https://hcc.vic.gov.au/
Australian Health Practitioners Regulation Agency (AHPRA)	Complaints relating to a registered health care practitioner and those holding themselves out as a registered health practitioner.	https://www.ahpra.gov.au/
Drugs and Poisons Regulation, Department of Health and Human Services	Complaints relating to use, supply or administration of drugs by registered health practitioners.	https://www2.health.vic.gov.au/public-health/drugs-and-poisons

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