

# DaVinci Elite Australia Pty Limited

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October 22, 2010

Mr Steve Marty  
Chair  
Pharmacy Board of Australia  
GPO Box 9958  
Melbourne VIC 3001

Dear Mr Marty,

Further to your letter dated October 19 advising the availability of the draft Guidelines addressing the provision of services by Pharmacists and the obligations of proprietors, we would like to submit our comments and definitions relating to Chairside Self Administered Cosmetic Teeth Whitening as invited to do so in your letter.

We believe that Pharmacy plays an integral role in the provision of teeth whitening in-store:

- A safe and hygienic environment
- Complete customer privacy
- Pharmacist(s) available for advice (non-dental specific)

DaVinci Elite has developed guidelines and training processes to ensure that Pharmacists and their staff comply with the Healthcare Professions Regulations. We believe that clear teeth whitening definitions need to be included in the Boards Guidelines to ensure compliance and 'non-dental' activity.

Chairside Self Administered Cosmetic Teeth Whitening can be offered by Pharmacists to consumers according to the National Pharmacy Board providing the following definitions are applied:

- Referred to as "Chairside self-administered cosmetic teeth whitening treatment" undertaken by a customer
- The self-administered treatment is supervised by a pharmacist or appropriately qualified staff member with knowledge of procedures and protocols which address a customers self-assessment based on documentation supplied. This includes:
  - Acknowledgment form addressing precautions, contraindications and current teeth condition before a decision is made by the customer to proceed.
  - Instructions on how to self administer the teeth whitening treatment
  - After treatment instructions
- Use of Pre-Loaded (H<sub>2</sub>O<sub>2</sub> or Carbamide Peroxide) Mouth Trays designed for comfort and safe use
- A Pharmacist or staff in not permitted to touch the customers teeth or apply any material to the teeth
- Where questions of a dental nature are raised by a customer, they should be referred to the customers dentist
- Pharmacists must ensure the service is aligned with the pharmacy profession 'code of conduct' and guidelines sanctioned by the National Pharmacy Board and operated in accordance with State and Territory legislation.
- The service is provided in a designated treatment area within pharmacy, which provides privacy.

We believe these definitions provide clarity to Pharmacists when considering Chairside Self Administered Cosmetic Teeth Whitening options available.

Thank you for the opportunity to provide this submission and we look forward to seeing the finalised Guideline in due course.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Philip J. Boston". The signature is written in a cursive style with a long horizontal flourish underneath.

**Philip J Boston**  
**CEO**  
**DaVinci Elite Australia Pty Ltd**