

**PROHIBITION ORDER**  
**HEALTH COMPLAINTS ACT 2016**  
**Section 95**

This Prohibition Order is made pursuant to section 95 of the *Health Complaints Act 2016 (Act)*.

The Health Complaints Commissioner (**Commissioner**) has made this Prohibition Order because the Commissioner has completed an investigation under Part 4 of the Act and is satisfied that:

- the general health service provider named below has contravened a code of conduct applying to the general health service, and
- it is necessary to make this Prohibition Order to avoid a serious risk to the health, safety or welfare of the public.

<b>Name of the general health service provider on whom the Prohibition Order is imposed:</b>	Georgia Douglas of Geelong in the State of Victoria.
<b>Date of this Prohibition Order:</b>	24 November 2022
<b>Date on which this Prohibition Order expires:</b>	Until varied or revoked by order of the Commissioner.
<b>Effect of this Prohibition Order:</b>	<ol style="list-style-type: none"> <li>Ms Douglas must not, directly or indirectly: <ol style="list-style-type: none"> <li>advertise or cause to be advertised,</li> <li>offer or cause to be offered,</li> <li>provide or cause to be provided, or</li> <li>establish, direct or otherwise operate any business that either advertises, offers or provides (or causes to be advertised, offered or provided) any general health service, paid or otherwise, in a clinical or non-clinical capacity.</li> </ol> </li> <li>Ms Douglas will continue to be subject to this Prohibition Order until she receives notice that she has complied, to the Commissioner's satisfaction, with conditions 3, 4, 5, 6 and 7.</li> <li>Ms Douglas must obtain appropriate Professional Indemnity Insurance (<b>PII</b>) and provide evidence to the HCC of the same.</li> <li>Within one month of the HCC providing the final investigation report to Ms Douglas, she must review the following documents: <ol style="list-style-type: none"> <li>The HCC's <i>Code of Conduct for General Health Services (the Code)</i>, and</li> <li>The Australian Dental Association's <i>Policy Statement 2.2.8 – Community Oral Health Promotion: Teeth Whitening (Bleaching) By Persons Other Than Dental Practitioners (the ADA Policy)</i>. At the time of imposing this Prohibition Order, the ADA policy was available at: <a href="https://www.ada.org.au/Dental-">https://www.ada.org.au/Dental-</a></li> </ol> </li> </ol>

	<p><a href="#">Professionals/Policies/National-Oral-Health/2-2-8-Teeth-Whitening/ADAPolicies_2-2-8_TeethWhiteningByPersonsOtherThan.aspx</a></p> <ol style="list-style-type: none"> <li>5. Within one month of the HCC providing the final investigation report to Ms Douglas, she must submit to the HCC, to the Commissioner's satisfaction, a reflective practice report. The reflective practice report must demonstrate: <ol style="list-style-type: none"> <li>a) How Ms Douglas has reflected on the matters that gave rise to the investigation.</li> <li>b) What Ms Douglas has learned from reviewing the Code stipulated in condition 4(a) above.</li> <li>c) What Ms Douglas has learned from reviewing the ADA policy stipulated in condition 4(b) above.</li> </ol> </li> <li>6. Within one month of submitting the reflective practice report required in condition 5, Ms Douglas must, to the satisfaction of the Commissioner, develop, implement and provide evidence of procedures for: <ol style="list-style-type: none"> <li>a) Record-keeping,</li> <li>b) Obtaining informed consent, and</li> <li>c) Infection control.</li> </ol> </li> <li>7. At a minimum, the procedures required under condition 6 must: <ol style="list-style-type: none"> <li>a) Establish an appropriate process for recording all appointments,</li> <li>b) Establish an appropriate process for obtaining informed client consent for all appointments, and</li> <li>c) Establish appropriate procedures to ensure infection control standards are met.</li> </ol> </li> </ol>
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In this Prohibition Order 'general health service' and 'general health service provider' have the same meaning as in section 3 of the *Health Complaints Act 2016*.

This Prohibition Order takes effect on the service of the Prohibition Order on the general health service provider to whom it applies.

This Prohibition Order will be published in the Victoria Government Gazette and on the website of the Health Complaints Commissioner at [www.hcc.vic.gov.au](http://www.hcc.vic.gov.au).



**Adjunct Professor Bernice Redley**  
**Health Complaints Commissioner**