



## **Formal AHPRA Compliance Audit Report**

**Subject:** Mediskin Aesthetics (<https://mediskinaesthetics.com.au>)

**Social Media:** Facebook: <https://facebook.com/mediskin.au> / Instagram: <https://instagram.com/mediskin.au>

**Audit Date:** 23 June 2025

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### **1. Executive Summary**

This report presents a comprehensive compliance audit of Mediskin Aesthetics' digital presence, encompassing its main website and linked social media channels. The primary objective is to assess conformity with advertising and ethical requirements as defined by the Australian Health Practitioner Regulation Agency (AHPRA), the Medical Board of Australia, and relevant AMA ethical advertising standards. This audit includes a full review of website structure, textual content, visual assets (including imagery and videos), social media activity, and any promotional frameworks such as memberships or discounts.

The clinic demonstrates a well-branded and professional online presence. However, several areas require urgent attention, particularly with respect to inducements, unverified or promotional claims, and content lacking appropriate disclaimers. The following report outlines specific breaches, assigns compliance risk levels, and offers practical recommendations to mitigate regulatory risk and achieve best-practice standards.

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### **2. Resources Audited**

- **Website:** <https://mediskinaesthetics.com.au>
- **Sub-Pages and Landing Pages Audited:**
  - Anti-Wrinkle Injections: <https://mediskinaesthetics.com.au/antiwrinkle>
  - Laser Skin Rejuvenation: <https://mediskinaesthetics.com.au/laser-rejuvenation>
  - About the Clinic: <https://mediskinaesthetics.com.au/about-us>
  - Membership Programs: <https://mediskinaesthetics.com.au/membership>
  - Booking Portal: <https://mediskinaesthetics.com.au/book-now>
- **Social Media Accounts:**
  - Facebook Page: <https://facebook.com/mediskin.au>
  - Instagram Profile: <https://instagram.com/mediskin.au>
- **Time Frame of Review:** All content posted or updated within the 12 months preceding this report (June 2024 – June 2025)

### 3. Website Content Analysis

#### 3.1 Anti-Wrinkle Injections Page

**URL:** <https://mediskinaesthetics.com.au/antiwrinkle>

- **Textual Content:** The copy includes phrases such as "erase years off your face" and "experience instant transformation." These statements imply guaranteed results and exaggerate typical outcomes.
- **AHPRA Breach:** These are promotional and potentially misleading under AHPRA Guidelines for Advertising Regulated Health Services (Section 6.2 - Misleading or Deceptive Claims). Claims must reflect the reality that outcomes are variable and depend on multiple factors including age, skin condition, and patient compliance.
- **Image Content:** Standard visuals of models and injectables in clinical settings; no overt before-and-after comparison imagery.
- **Risk Level:** Medium
- **Recommendations:** Substitute subjective language with evidence-informed statements. Example: Replace "erase years off your face" with "Anti-wrinkle treatments may reduce the appearance of lines and wrinkles in some individuals. Results vary."

#### 3.2 Laser Skin Rejuvenation Page

**URL:** <https://mediskinaesthetics.com.au/laser-rejuvenation>

- **Textual Content:** Includes references to "reversing the signs of ageing" and "revealing your best skin instantly." Again, these are outcome-based promises that may not be representative of average or expected results.
- **Visual Content:** Contains a before-and-after image slider with no disclaimers.
- **AHPRA Breach:** This constitutes both a testimonial-style representation and a potential overstatement of benefits without noting risks or variability (Sections 6.3 and 6.4).
- **Risk Level:** Medium–High
- **Recommendations:** All comparative visuals should be clearly marked with disclaimers such as "Results shown are not typical. Individual results vary. Images are for illustrative purposes only."

#### 3.3 About Us Page

**URL:** <https://mediskinaesthetics.com.au/about-us>

- **Textual Content:** Credentials and professional affiliations are clearly listed. Practitioners include a FRACGP-qualified doctor and experienced registered nurses.
- **Compliance Strength:** Transparent presentation of professional qualifications and scope of practice aligns with ethical standards.



- **Risk Level:** None

### 3.4 Membership Page

**URL:** <https://mediskinaesthetics.com.au/membership>

- **Textual Content:** The membership program offers tiered benefits, including access to monthly skin treatments, LED therapy, discounts on injectables, and a “complimentary cosmetic consultation valued at \$120.”
- **AHPRA Breach:** This constitutes an inducement linked to a regulated health service, violating Section 7.3. Offers must not involve high-value gifts, discounts, or bundled health services beyond nominal value.
- **Risk Level:** High
- **Recommendations:** Remove the reference to the consultation value. Reframe offers to avoid bundling regulated health services. All promotions should meet the "low-value threshold" as per AHPRA's advertising rules (generally under \$20).

### 3.5 Booking Page

**URL:** <https://mediskinaesthetics.com.au/book-now>

- **Booking Policy:** Requires a \$50 deposit, redeemable against services. This is clearly disclosed.
- **Compliance:** Transparent pricing, cancellation policies, and terms of engagement are displayed. Acceptable under current guidelines.
- **Risk Level:** None

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## 4. Social Media Audit

### 4.1 Facebook: <https://facebook.com/mediskin.au>

**Post Date:** 12 May 2025

**Post Content:** “You won’t believe the results after just one treatment! Look at this amazing transformation.” Includes a close-up before-and-after style image without disclaimers.

- **AHPRA Breach:** Language implies guaranteed and rapid results. The image constitutes an implied testimonial.
- **Risk Level:** High
- **Recommendations:** Avoid superlatives and testimonial-style content. Replace with wording like "some patients may notice visible improvement after treatment; results can vary."

**Post Date:** 4 April 2025

**Post Content:** “Book now and receive a free consultation plus a discount on your first treatment.”



- **AHPRA Breach:** Inducement via gift and discount tied to a regulated health service. Violates inducement rules.
- **Risk Level:** High
- **Recommendations:** Rephrase or eliminate the post. Offering a free consult is acceptable if it is standard for all patients, but advertising it as a gift undermines compliance.

#### 4.2 Instagram: <https://instagram.com/mediskin.au>

**Post Date:** 2 June 2025

**Caption:** “Our clients are obsessed with their transformation! 🔄 Swipe to see why!”

- **Visuals:** Before-and-after comparison images.
- **AHPRA Breach:** Testimonial-style language and visuals. No disclaimer present.
- **Risk Level:** High
- **Recommendations:** Replace with educational content or patient education infographics. Include disclaimers in all comparative visuals.

**Post Date:** 18 March 2025

**Caption:** “Glowing skin is just one treatment away!”

- **AHPRA Breach:** Misleading suggestion of immediate results.
- **Risk Level:** Medium
- **Recommendations:** Use compliant alternatives: "Many patients see gradual improvement following treatment."

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### 5. Visual & Imagery Audit

- **Before-and-After Use:** Used across laser and injectable services without disclaimers.
- **Videos:** Some reels and stories show post-treatment satisfaction clips that may imply endorsement.
- **Compliance Issue:** Testimonials are banned in all advertising formats under Section 6.4.
- **Recommendations:** Replace with generic process videos or treatment animations with informative commentary.

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### 6. General Compliance Checklist

Criteria	Compliance Status	Notes
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Clear display of practitioner credentials	✓ Compliant	All qualifications and titles used correctly
Contact details and hours present	✓ Compliant	Easily accessible on all main pages
Transparent pricing and deposits	✓ Compliant	Booking fees are disclosed
Use of superlatives and exaggerated claims	⚠ Non-compliant	Needs revision on several pages/posts
Inducements linked to treatment	✗ Breach	Present on Facebook and Membership page
Testimonials or implied endorsements	✗ Breach	Present in social captions and visuals
Risk disclosures for procedures	⚠ Partial	Present in some but not all services

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## 7. Recommendations Overview

### High Priority Actions

- Remove or rewrite all promotional posts and captions that imply guarantees or testimonial-style language.
- Discontinue use of before-and-after images unless accompanied by disclaimers.
- Review and revise the membership model to exclude regulated health services from bundled offers.

### Medium Priority Actions

- Standardise risk and outcome disclaimers across all service pages.
- Add a permanent disclaimer to social profiles: "Results vary. Treatment suitability must be assessed by a registered practitioner."

### Low Priority / Best Practice

- Consider adding a 'Compliance and Ethics' footer page outlining the clinic's alignment with AHPRA and AMA values.
- Provide staff training on social media content compliance and advertising standards.

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## 8. Best Practice Highlights

Despite the non-compliant aspects noted, several areas reflect a strong commitment to ethical and regulatory marketing:



- Use of professional and medically accurate imagery.
- Transparent booking process with disclosed fees and policies.
- Display of practitioner credentials in accordance with AHPRA's requirements.
- Inclusion of a few pages (e.g., "About Us") written in a balanced, educational tone.

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## 9. Conclusion

Mediskin Aesthetics demonstrates clear intent to offer high-quality, medically led cosmetic services. However, the current advertising and promotional strategies—particularly across social media and membership offerings—pose a significant regulatory risk. Immediate adjustments are necessary to meet the requirements outlined in AHPRA's Guidelines for Advertising Regulated Health Services, the Medical Board's Cosmetic Surgery and Procedures Guidelines, and the AMA's Code of Conduct.

AHPRA mandates truthful, non-misleading content, clear disclosure of practitioner credentials, appropriate risk communication, and strict avoidance of testimonials or inducements tied to clinical outcomes. Compliance not only reduces risk of regulatory action but strengthens public trust and reinforces the clinic's professional reputation.

### Next Steps:

- Implement the recommendations outlined.
- Undertake a follow-up audit in 3–6 months to ensure sustained compliance.
- Maintain a compliance log for internal tracking and future audits.

### Prepared by:

Medicom Compliance Auditor

**Date:** 23 June 2025