

Neurotoxins and dermal fillers in dentistry.



The use of neurotoxins and dermal fillers has become part of the practice of dentistry over the past decade. Practitioners who are considering offering these treatments to patients should ensure they have a good grasp of their related professional obligations and are able to comply with all relevant laws.

Will my Professional Indemnity Policy cover me for injectables?

Before using neurotoxins and dermal fillers in their practices, dentists must confirm that their professional indemnity insurance policy provides appropriate cover for the treatment. This means being sure your policy covers your civil liability in relation to treatment complications or adverse events arising.

Guild Insurance's professional indemnity policy has always covered dentists for claims related to the practice of dentistry within the practitioner's scope of practice, including the use of neurotoxin and dermal fillers. Note: the use of Fillers in the upper face is not recommended and is not covered.

What are the expectations of the Dental Board of Australia?

The Dental Board of Australia (DBA) provides guidance on the implementation of neurotoxins and dermal fillers in dental clinical practice at: [The use of botulinum toxin and dermal fillers by dentists](#)¹.

Key considerations:

The Board expects dental practitioners to assess and treat patients within the definition of dentistry:

- > "Dentistry involves the assessment, prevention, diagnosis, advice, and treatment of any injuries, diseases, deficiencies, deformities or lesions on or of the human teeth, mouth or jaws or associated structures."

What does the "Practice of Dentistry" and "Associated Structures" mean?

The definition of dentistry is designed to be flexible with advances in knowledge, materials, techniques and community views constantly evolving. Although the DBA does not define "associated structures", it is expected that practitioners exercise their professional judgement as to which anatomical structures are included in their care.

Practical considerations:

Providing dental treatment for a dental patient involves:

- > assessing the patient to determine whether a dental diagnosis applies to their presenting condition and concerns.
- > advising the patient of the risks, benefits and costs of all treatment options available to treat their condition

- > performing any treatment safely and competently.
- > understanding when and how to manage adverse events.

The care and wellbeing of the patient is expected to be the clinician's primary consideration. The DBA expects dentists to refer patients:

- > when the treatment required by the patient is outside the personal scope of the individual dentist (but still within the definition of dentistry) to another dentist or dental specialist OR
- > when the proposed treatment is outside the definition of dentistry, to a medical practitioner.

Dentists must not delegate treatment involving neurotoxins and dermal fillers.

Legal requirements:

An understanding of all legal requirements is essential for safe and lawful practice.

Dentists must comply with:

- > [State and territory drugs and poisons laws](#)
- > [TGA regulations for advertising](#)
- > [TGA regulations for 'off-label'](#)

TGA considerations:

The DBA expects dentists to adhere to all relevant drugs and poisons legislation relating to the storage, use and supply of medicaments and by using scheduled medicines 'for dental therapeutic use' only.

It is recommended that dentists clearly state their diagnosis and reason for the prescription of injectables in the patient's clinical record.

The TGA does not assess Off-Label Use. Off-Label Use of scheduled medication requires clinical judgement of the practitioner and consent of the patient.

- > dentists should only purchase products registered on the Australian Register of Therapeutic Goods (ARTG) for legal supply in Australia.
- > advise patients (ie: clearly state) that the use of botulinum toxin and dermal fillers is considered "off label" and experimental only.
- > all risks associated with administration of the product/s must be explained and documented.
- > **informed consent must be obtained in writing.**

Advertising considerations:

There are restrictions on the advertising of neurotoxins and dermal fillers.

Higher risk cosmetic procedures have unique features and specific risks both in providing and advertising them.

Higher risk cosmetic procedures are procedures which may be invasive and can cause complications or harm to the patient which may be irreversible.

Applicable advertising restrictions are explained within Federal, State and Territory Guidelines:

- > [National Law advertising requirements](https://www.dentalboard.gov.au/Codes-Guidelines/FAQ/botulinum-toxin-and-dermal-fillers.aspx)²
- > [Guidelines for advertising a regulated health service](https://www.dentalboard.gov.au/Codes-Guidelines/Advertising-a-regulated-health-service/Guidelines-for-advertising-regulated-health-services.aspx)³
- > [Guidelines for advertising non-surgical cosmetic procedures](https://www.ahpra.gov.au/Resources/Cosmetic-surgery-hub/Cosmetic-procedure-advertising-guidelines.aspx)⁴
- > [State and Territory restrictions on advertising controlled substances](https://www.tga.gov.au/products/regulations-all-products/advertising/advertising-legal-framework#other-legislation)⁵
- > [TGA regulations for advertising](https://www.ahpra.gov.au/Resources/Cosmetic-surgery-hub/Cosmetic-procedure-guidelines/Resources-for-performing-non-surgical-cosmetic-procedures.aspx)⁶

Ahpra guidelines for non-surgical cosmetic procedures:

New Guidelines: [Australian Health Practitioner Regulation Agency \(Ahpra\)](https://www.ahpra.gov.au/Practitioner-Regulation-Agency(Ahpra)/)⁷ for practitioners performing non-surgical cosmetic procedures came into effect in September 2025 and include additional resources to support understanding.

-Cosmetic procedures or cosmetic injectables must only be provided or prescribed by registered health practitioners who have appropriate education, knowledge, training, competence, authorisations and experience to safely perform the specific cosmetic procedure.

- > Competence requires that you can perform the cosmetic procedure, deal with all routine aspects of care and have the ability to deal with any likely complications.
- > Minimum education standards and training requirements include:
 - > appropriate training in relevant anatomy and physiology.
 - > training on patient assessment for suitability for the procedure.
 - > both theoretical and hands-on

training in the specific procedure being offered including assessment and demonstration of competence to safely perform the procedure.

- > care of the person (including side effects, and short and long term complications and their management).
- > Where your SOP includes cosmetic procedures, you must continue to undertake CPD activities related to cosmetic procedures.

Which is the correct item code for injection of botulinum toxin and dermal fillers?

The Australian Dental Association (ADA) publication The Australian Schedule of Dental Services and Glossary – Thirteenth Edition – includes the following relevant item codes and descriptors:

> 929 – Provision of neuromodulator therapy

Injection of neuromodulators for the treatment of oral and maxillofacial diseases and disorders.

> 987 – Recontour tissue – per appointment

Recontour of oral and associated tissue not described elsewhere in the Thirteenth Edition, such as the injection of dermal fillers.

Will private health insurers pay a benefit for treatment that includes botulinum toxin and dermal fillers?

Private health insurers have different rules and different policies when it comes to the treatments for which they will pay a benefit. Patients should be encouraged to contact their health fund to ascertain this information.

¹ <https://www.dentalboard.gov.au/Codes-Guidelines/FAQ/botulinum-toxin-and-dermal-fillers.aspx>

² <https://www.ahpra.gov.au/Resources/Advertising-hub.aspx>

³ <https://www.dentalboard.gov.au/Codes-Guidelines/Advertising-a-regulated-health-service/Guidelines-for-advertising-regulated-health-services.aspx>

⁴ <https://www.ahpra.gov.au/Resources/Cosmetic-surgery-hub/Cosmetic-procedure-advertising-guidelines.aspx>

⁵ <https://www.tga.gov.au/products/regulations-all-products/advertising/advertising-legal-framework#other-legislation>

⁶ <https://www.tga.gov.au/products/regulations-all-products/advertising>

⁷ <https://www.ahpra.gov.au/Resources/Cosmetic-surgery-hub/Cosmetic-procedure-guidelines/Resources-for-performing-non-surgical-cosmetic-procedures.aspx>

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