



Dr. Naveen TANDON

Agreed Statement of Facts and Admissions

Date Charge(s) Laid:	November 19, 2021
Hearing:	January 28, 2022
Charge(s):	Unprofessional Conduct; Prescribing, Improper; Standards of Practice, Failure to meet
Outcome Date:	January, 2022

1. Dr. Tandon admits unprofessional conduct in relation to each of the six charges laid by the Council.
2. While the charges are admitted, not all of the elements contained in each of the charges are admitted. This document identifies the scope of Dr. Tandon's admissions.
3. The Registrar's Office and Dr. Tandon put forward the following admissions and agreements for the purpose of Council determining the appropriate penalty. The Registrar's Office and Dr. Tandon agree that only the conduct specifically admitted in this document can be considered by the Council when determining penalty. That does not preclude the Registrar's Office from providing other information about Dr. Tandon unrelated to the charges, that can be considered by the Council in relation to determining the appropriate penalty. That does not preclude Dr. Tandon from providing other information about his conduct in relation to Physician Skincare Center practice that is not inconsistent with his admissions of unprofessional conduct that can be considered by the Council in relation to determining the appropriate penalty.

Charge #1

4. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 1 laid by the Council of the College of Physicians and Surgeons. The admission is made on the basis that he failed to exercise due diligence as set out in the following portion of charge number 1:

Particulars of your conduct are that you failed to exercise due diligence to ensure that you met the requirements of College bylaw 23.3 in relation to the individuals working at Physician Skincare Center who provided Botox and/or Dysport and/or dermal filler.

Scope of Admission

5. Dr. Tandon admits that there was insufficient supervision and oversight of nurses as required by College bylaw 23.3.
6. Dr. Tandon's admission of unprofessional conduct to charge number 1 is based upon there being insufficient ongoing formal oversight of the nurses who were working at Physician Skincare Center. Dr. Tandon denies that his initial assessment or training of the nurses, or his assessment of patients, was insufficient.
7. Dr. Tandon does not admit the remainder of the allegations in charge number 1 and the Registrar's Office of the College of Physicians and Surgeons does not present any evidence in relation to any of the other allegations.

Charge #2

8. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 2 laid by the Council of the College of Physicians and Surgeons. The admission is made on the basis that he failed to exercise due diligence as set out in the following portion of charge number 2:

In the alternative, particulars of your conduct are that you failed to exercise due diligence to ensure that the persons working at Physician Skincare Center were appropriately assessed and supervised to provide Intense Pulsed Light treatments and/or laser treatments.

You failed to provide appropriate guidance to the individual providing these treatments related to the conditions which could be treated.

Scope of Admission

9. Dr. Tandon's admission of unprofessional conduct under charge number 2 is based on the fact that the individual providing laser treatments was not aware of whether she could treat Rosacea without supervision from a physician.
10. Dr. Tandon does not admit the remainder of the allegations in charge number 2 and the Registrar's Office of the College of Physicians and Surgeons does not present any evidence in relation to any of the other allegations.

Charge #3

11. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 3 laid by the Council of the College of Physicians and Surgeons.
12. That charge states:

3. You, Dr. Naveen Tandon are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(o) and/or 46(p) of The Medical Profession Act, 1981 s.s. 1980-81 c. M-10.1 and/or paragraph (o) of bylaw 7.2 and/or bylaw 8.1(b)(ii) and/or bylaw 8.1(b)(ix).

Particulars of your conduct are that you inappropriately permitted, counselled or authorized an individual to utilize topical anesthesia in connection with the provision of Intense Pulsed Light treatments and/or laser treatments.

In the alternative, particulars of your conduct are that you failed to exercise due diligence to ensure that the individual who utilized topical anesthesia in connection with the provision of Intense Pulsed Light treatments and/or laser treatments was appropriately assessed and supervised to utilize topical anesthesia in connection with the provision of provide Intense Pulsed Light treatments and/or laser treatments.

The evidence that will be led in support of this charge will include one or more of the following:

- a) *The individual was not a licensed professional authorized to use topical anesthesia as part of their scope of practice.*
- b) *You failed to assess this individual's skill and knowledge in the use of topical anesthesia.*
- c) *You failed to provide ongoing supervision related to this individual's use of topical anesthesia.*

Charge #4

13. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 4 laid by the Council of the College of Physicians and Surgeons.

Scope of Admission

14. Dr. Tandon admits that:

- a. He failed to enact a system for the ongoing monitoring of the nurses and the skin technician, and
- b. He was over-reliant on nursing staff to develop clinic procedures and directives.

15. Dr. Tandon does not admit the remainder of the allegations in charge number 4 and the Registrar's Office of the College of Physicians and Surgeons does not present any evidence in relation to any of the other allegations.

Charge #5

16. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 5 laid by the Council of the College of Physicians and Surgeons.

17. That charge states:

5. You, Dr. Naveen Tandon are guilty of unbecoming, improper, unprofessional, or discreditable conduct contrary to the provisions of Section 46(o) and/or 46(p) of The Medical Profession Act, 1981 s.s. 1980-81 c. M-10.1 and/or bylaw 8.1(b)(ix).

Particulars of your conduct are that you permitted, counselled or authorized persons to provide cosmetic services including injections of Botox and/or Dysport and/or dermal fillers and/or Intense Pulsed Light treatments and/or laser treatments without having an appropriate process in place to deal with possible emergent complications.

Charge #6

18. Dr. Tandon admits that he is guilty of unprofessional conduct in relation to charge number 6 laid by the Council of the College of Physicians and Surgeons.

Scope of Admission

19. Dr. Tandon admits that pre-signed prescriptions for Valtrex, including the standard dosage and frequency, and permitted, counselled, or authorized one or more persons working at Physician Skincare Center to complete those prescriptions by including the patient's identifying information, based on an ongoing verbal order following initial assessment.

20. Dr. Tandon does not admit the remainder of the allegations in charge number 6 and the Registrar's Office of the College of Physicians and Surgeons does not present any evidence in relation to any of the other allegations.