



# Compliance Policy - Supervision

## THIS POLICY APPLIES TO

A pharmacist who is the subject of supervision conditions imposed in NSW.

## PURPOSE

This policy sets out the Pharmacy Council's expectations of pharmacists who have supervision conditions imposed on their registration.

A pharmacist who is the subject of supervision conditions must comply with both this policy as well as the conditions. If a condition is inconsistent with any part of this policy, the condition prevails.

## REQUIREMENTS FOR COMPLYING WITH A SUPERVISION CONDITION

Pharmacists who are the subject of a supervision condition must:

1. Practise in a manner that complies with the category of supervision required by their condition.
2. Nominate proposed supervisors to the Council in accordance with the requirements of their category of supervision. The Council will not automatically approve nominated supervisors and approval cannot be assumed. Pharmacists must have received confirmation of approval of any supervisor to ensure compliance with their condition.
3. Participate in review meetings with the Council-approved supervisor as required.
4. Authorise the supervisor to forward supervision reports (in a Council approved format) to the Council at the frequency required by their condition and ensure that the supervisor does in fact provide those reports.
5. Authorise the supervisor to immediately inform the Council of any concerns regarding the performance of the pharmacist and their compliance with any conditions on their registration, or if the supervisory relationship ends.
6. Meet all costs associated with supervision.
7. Ensure continuity of supervision by nominating a suitable substitute supervisor for approval by the Council to cover any planned period of absence by the Council-approved supervisor. Any such nomination must be made with adequate time to allow consideration and approval by the Council.
8. Immediately nominate a proposed replacement supervisor to be approved by the Council when the current approved supervisory relationship ends or is unexpectedly suspended.

## CONSEQUENCE OF FAILURE TO COMPLY WITH THIS POLICY

Failure to comply with this policy constitutes a breach of conditions.

Any breach of conditions may be referred to the Health Care Complaints Commission for investigation as a complaint. The Council may also consider taking interim action under [s 150 of the Health Practitioner Regulation National Law \(NSW\) \(National Law\)](#). Pharmacists should know that the definition of unsatisfactory professional conduct (see [s 139B\(1\)\(c\) of the National Law](#)) includes contravention of a condition to which a pharmacist's registration is subject.

## IMPLEMENTATION

This Policy will be published on the Council's website, provided to pharmacists when a supervision condition is imposed and provided to nominee and approved supervisors. It should be read in conjunction with the Council's Supervisor Approval Position Statement.

Pharmacists whose registration is subject to a condition requiring supervision imposed in NSW, must practise in compliance with their supervision conditions as well as this policy.

## THE REQUIREMENTS AND NATURE OF EACH CATEGORY OF SUPERVISION

Decision makers will usually impose a supervision condition requiring supervision at a specified category in accordance with this policy. The requirements of supervision is described in the table below and is to be adhered to unless varied by the conditions imposed on the pharmacist's registration.

	Type of supervision required	Supervisor required to practise at the same practice location as the pharmacist?	Independent practice such as on-call, after-hours work, nursing home and home visits permitted?	Frequency of review meetings with supervisor	Frequency of reports provided to Council	Nomination of a proposed supervisor	Nature of the review meetings
<b>Category A</b>	Direct supervision is required at all times.	Yes, at all times.	No.	Continuous supervision with weekly* review meetings	Once a month*	Within 14 days^	<p>The nature and duration of a review meeting is to be determined by the approved supervisor as guided by the supervision condition and other relevant information. A review meeting may address the following:</p> <ul style="list-style-type: none"> <li>• Discussion of conditions and compliance</li> <li>• Observed practice</li> <li>• Case presentations</li> <li>• Dispensing records /drug register reviews</li> </ul>
<b>Category B</b>	The supervisor is to monitor and provide indirect supervision and be readily available to provide advice, assistance or direct supervision as required.	<p>Yes, the supervisor is to practice at the same location.</p> <p>The supervisor may in exceptional circumstances be off-site but must be contactable by phone to provide advice or assistance as required.</p>	Yes, unless restricted by their practice conditions.	Fortnightly*	Every 3 months*	Within 21 days^	
<b>Category C</b>	Indirect supervision is required. The supervisor must be contactable by phone for emergencies.	No, but the supervisor must be contactable by phone and should attend on occasion to review records and files.	Yes, unless restricted by their practice conditions.	Monthly*	Every 6 months*	Within 21 days^	

\* Frequency may be varied by a review body

^ From the date of imposition of conditions and/or from the date when a nomination is decline