



Aboriginal and Torres Strait  
Islander Health Practice  
Chinese Medicine  
Chiropractic  
Dental  
Medical  
Medical Radiation Practice  
Nursing and Midwifery  
Occupational Therapy  
Optometry  
Osteopathy  
Pharmacy  
Physiotherapy  
Podiatry  
Psychology

Australian Health Practitioner Regulation Agency

## Response template: Public consultation - proposed *Supervised practice framework* and supporting documents

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The National Boards (excluding Pharmacy and Psychology) and Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the proposed *Supervised practice framework* (framework) and supporting documents.

This response template is an alternative to providing your response via the online survey available on [our website](#).

### IMPORTANT INFORMATION

#### Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the proposed framework and supporting documents. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

#### Publication of responses

Published responses will include the name of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

#### Submitting your response

Please send your response to: [ahpra.consultation@ahpra.gov.au](mailto:ahpra.consultation@ahpra.gov.au)

Please use the subject line: Feedback on Supervised practice framework

Responses are due by: **17 December 2019**

**General information about your response**

Are you responding on behalf of an organisation?	
Yes	What is the name of your organisation? Australian College of Nursing
No	Are you a registered health practitioner? Yes/No If yes, which profession(s)? Nursing
Name (optional)	██████████
Contact phone number (optional)	████████████████████ ███    ██████████ ████████████████ ████████████████████████████████

## Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the proposed framework and supporting documents.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

National Boards and AHPRA have developed the *Supervised practice framework* (the framework) and supporting documents to enable a responsive and risk-based approach to supervised practice across the National Registration and Accreditation Scheme (the National Scheme).

The National Boards' preferred option is to adopt the proposed framework and supporting documents.

**1. How helpful and clear is the content and structure of the proposed framework? Please explain your answer.**

The content of the proposed framework is clear, easy to read and enables the reader to readily understand the rationale for developing the framework.

It also clearly explains the responsibilities of the supervisor and supervisee, their relationship at practise levels and ensures practitioner practice is safe and not placing the healthcare consumer or public at risk.

The word 'consult' is used to describe the interaction between a supervisee and supervisor in the levels of supervised practice (see Section 5 Levels in the framework and the *Fact sheet: Supervised practice levels*). The word 'consultation' is often used to describe the interaction between a patient/client and a health practitioner.

**2. Is the meaning of 'consult' clear for the purposes of the supervised practice levels? Why or why not?**

Yes. The meaning of 'consult' is clear, that a supervisee must seek the advice of the supervisor, with the supervisor willingly providing clear explanation and direction.

The dynamic of the relationship between the supervisee and supervisor is clearly outlined within each level, so that there is no ambiguity about the expectations of each party.

**3. Is there any content that needs to be changed, added or removed in the proposed framework and/or supporting documents? If so, please provide details.**

ACN members suggest that the proposed framework would benefit from the inclusion of risk assessment requirements for the supervisor and supervisee. This would ensure that both parties are aware of and have considered any potential risks.

**4. Are there any other ways that the Board can support supervisees, supervisors and employers involved in the supervised practice arrangement?**

ACN recommends that the Boards and AHPRA develop a fact sheet for patients who are being cared for under the supervisee/supervisor practice arrangement. This would ensure that patients could be made aware of the situation, and it would dispel any confusion or concern that might arise. The attached appendices provide relevant links and resources for each of the professions. Given the inclusion of this information, we are not able to provide any further suggestions at this point in time.

**5. Is there anything else the Board should consider in its proposal to adopt the framework and supporting documents, such as impacts on workforce or access to health services?**

There are several ways in which the framework could impact on the health workforce:

- Impacts to a supervisor's normal work practices; the added responsibilities and administrative requirements of supervising have the potential to negatively impact their ability to provide quality patient care.
- The workforce in rural and remote areas with fewer staff and resources, and where skill mix might not be appropriate for such an arrangement is more likely to be adversely affected as above.
- Supervisees located in rural and remote areas are more likely to struggle to find an appropriately skilled and available supervisor due to reduced staff and resources.

Note:

Both supervisors and employers should have access to training **prior** to any supervised practice arrangement and **support throughout** the provision of any such arrangement.

Recognition of the time investment in supervised practice arrangements should be taken into consideration both for supervisors and employers such that workload reflects the commitment to these arrangements.

**6. Do you have any other comments on the proposed framework and/or supporting documents?**

ACN recommends that the Boards and AHPRA review the proposed framework in 5 years (or earlier in the event of any change to legislation or the workability of the supervised practice levels or supervisor/supervisee arrangement). This should also apply to the addition of any supplementary documents, information or best practice advice to be included in the guidelines.

**Thanks!**

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the proposed framework and supporting documents.