



# SUPERVISION OF VETERINARY PRACTITIONERS

VETERINARY PRACTITIONERS REGISTRATION BOARD  
OF VICTORIA POLICY

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## INTRODUCTION

This policy states the Board's approach to the imposition of conditions requiring supervision on veterinary practitioners granted registration by the Board under the *Veterinary Practice Act 1997* (the VPA).

The policy states requirements for the supervision of veterinary practitioners, and explains:

- what the Board expects of veterinary practitioners on whose registration the Board has imposed a condition that they are to be supervised by another veterinary practitioner
- what the Board expects of a veterinary practitioner who has agreed to supervise a veterinary practitioner and has been approved by the Board to provide that supervision, and
- what the Board expects of the supervised veterinary practitioner's employer.

This policy aims to be flexible. Individuals can propose arrangements that do not fit within this policy to the Board. The Board will consider each proposal on its individual merits and will only approve supervision arrangements that it considers will protect the public and the health and welfare of animals.

## 1. SCOPE

This policy applies where the Board has imposed supervision by another veterinary practitioner as a condition of a veterinary practitioner's registration. The Board may impose conditions on a veterinary practitioner's registration under the following sections of the VPA:

Section	Description
Section 6(3)	as a requirement of general registration granted under section 6 of the VPA
Section 7(2)	as a requirement of specific registration granted under section 7(1) of the VPA
Section 7A(2)	as a requirement of non-practising registration granted under section 7A of the VPA
Section 29(1)(b)	as an outcome of a preliminary investigation into the health of a veterinary practitioner
Section 31(2)	on the request of a veterinary practitioner who believes their ability to practise veterinary surgery is affected for reasons outlined in section 31(1) of the VPA
Section 45(2)(f)	as a determination of a formal hearing
Section 46(2)(a)	as a determination of a formal hearing into a practitioner's ability to practise
Section 46(3)	as a determination of a formal hearing into a practitioner's ability to practise, if a person who has ceased to be a veterinary practitioner re-applies for registration

This policy does not apply to veterinary practitioners on whom the Board has not imposed a condition relating to supervision on their registration. This policy does not extend to private supervision arrangements between an employer and a veterinary practitioner.

## 2. PURPOSE OF SUPERVISION

In all cases, the support and monitoring provided by supervision gives assurance to the Board, the veterinary profession, and the public that the practice of a veterinary practitioner is not putting the public or the health and safety of animals at risk.

Supervision may also:

- provide support to international veterinary graduates with qualifications that are not recognised by the Board to undertake training to achieve the competencies required for general registration
- assist veterinary practitioners who have not practised recently to re-gain the competencies required to practise without supervision
- monitor and assist veterinary practitioners who are the subject of an investigation into or determinations about their health, fitness to practise and/or professional conduct to maintain or re-gain the competencies required to practise without supervision.

## 3. DETERMINING IF THERE IS A NEED FOR SUPERVISION

The Board considers the following factors when deciding whether supervision is required and, if so, which level of supervision is appropriate:

1. The section of VPA under which the person has been (or will be) granted registration by the Board. As an example, section 7(1)(c) of the VPA requires that persons granted specific registration to undergo training to gain the competencies required for general registration must be **directly supervised** by a registered veterinary practitioner.
2. The position that the person has been offered (or holds), including:
  - the requirements of the position including the type of skills required for the position
  - the seniority of the position, e.g., at a tertiary institution or hospital
  - any management/supervision arrangements put in place by the employer
  - the location of the practice and availability of support in that location from professional peers
  - the level of risk of the position.
3. The qualifications, training and experience of the person, including:
  - their previous experience in the type of position for which they have applied
  - their experience and familiarity with the regulation of the veterinary profession in Victoria
  - their experience or familiarity with veterinary practice in Victoria or other jurisdictions in Australia or New Zealand
  - whether they have practised recently, and the scope of their recent practice.
4. Matters relating to the fitness to practise or professional conduct of the veterinary practitioner, including:
  - any ongoing disciplinary proceedings or investigations
  - any impairment which may affect the person's ability to practice
  - a finding of unprofessional conduct which may affect practice.
5. The availability of a veterinary practitioner who meets the minimum criteria for a supervisor and is able and willing to provide the required level of supervision.

## 4. PRINCIPAL AND SECONDARY SUPERVISORS

All veterinary practitioners on whose registration the Board has imposed a condition requiring supervision will have a Board-approved principal supervisor.

The proposed principal supervisor must sign an agreement consenting to provide supervision at the required level. If supervision is a condition of registration, the Board will not grant registration to an applicant for registration until it receives a supervisor's agreement signed by the proposed principal supervisor.

The principal supervisor may delegate supervision to secondary supervisors when absent from the practice. Secondary supervisors must have the necessary skills and experience to provide supervision and must meet the minimum criteria for supervisors in this policy.

The principal supervisor must list all registered veterinary practitioners who have agreed to being secondary supervisors on the supervision agreement, and each of those practitioners must provide their signed consent to being a secondary supervisor on the supervision agreement. The principal supervisor is responsible for updating the supervision agreement if/when the list of secondary supervisors changes.

The principal supervisor must ensure that they keep records which identify which veterinary practitioner was providing supervision at any given time and must provide these records to the Board on its request.

### MULTIPLE PRINCIPAL SUPERVISORS

Veterinary practitioners to whom the Board has granted registration under section 7(1)(c) of the VPA may have a condition on their registration that allows them to undergo training under direct supervision at more than one veterinary practice, e.g., a small animal practice and a large animal practice.

In such cases, the Board may appoint a principal supervisor to supervise the veterinary practitioner at each veterinary practice where they will be undergoing training.

## 5. MINIMUM CRITERIA FOR SUPERVISORS

A person proposed as a principal or secondary supervisor:

- must be on the Register of Veterinary Practitioners (Victoria) and must have been practising as a veterinary practitioner in Australia for at least 3 years (full-time equivalent practice)
- must be appropriately qualified, preferably in the same field of veterinary practice as the position proposed for the person they will be supervising
- must have good standing in the profession. Factors the Board may consider when assessing the professional standing of a proposed supervisor include:
  - whether the Board has imposed conditions on their registration or undertakings accepted by the Board as a result of health or conduct issues
  - the past complaint or notification history of the proposed supervisor
  - any disciplinary action or conviction resulting from proceedings under the VPA (or the relevant law in other jurisdictions where the proposed supervisor was registered previously)
  - any general information relating to their ability to supervise provided in a complaint to the Board or during disciplinary or other proceedings under the VPA or other legislation.
- must **not** be an employee, relative, or domestic partner of the person they will be supervising,

- must **not** be providing direct supervision to more than three other veterinary practitioners.

The Board may decide not to approve a proposed supervisor, or may revoke approval of a supervisor, if it receives a serious allegation about the supervisor's conduct, performance or health.

## 6. LEVELS OF SUPERVISION

Direct supervision is mandatory under the VPA in one instance. Under section 7(1)(c) of the VPA, a person **must be under the direct supervision of a registered veterinary practitioner** if they hold qualifications in veterinary practice which do not qualify them for general registration and the Board has granted them specific registration to enable them to undergo training to acquire the competencies required for general registration

In all other instances, the Board **may** impose either **direct** or **indirect** supervision on a veterinary practitioner's registration. When deciding whether to impose a supervision requirement and, if so, what level of supervision is required, the Board considers the factors set out on page 4 of this policy under the heading, [Determining if there is a need for supervision](#). The Board may also change the required level of supervision at any time in the period during which supervision is required (except if direct supervision is mandatory under section 7(1)(c) of the VPA).

Supervision arrangements required by the Board must always be in place when the supervised veterinary practitioner is practising. The supervised veterinary practitioner must not practise if the supervision arrangements cannot be met.

### DIRECT SUPERVISION

#### Imposition of direct supervision

As stated previously in this policy, the Board must impose a requirement for direct supervision on persons granted specific registration under section 7(1)(c) of the VPA.

In other circumstances, the Board **may** decide that direct supervision of a veterinary practitioner granted general or specific registration is appropriate if the practitioner:

- has not practised recently or has only recently obtained their qualification
- has only worked in a limited field of practice
- is not familiar with the regulatory environment for veterinary practitioners in Victoria/Australia
- is subject to Board disciplinary proceedings or a determination relating to their professional conduct or fitness to practise.

#### Responsibilities re direct supervision

If direct supervision is required, the supervisor must be physically present at the workplace at all times the supervised veterinary practitioner is practising, including during any after hours or on-call practice. While the supervisor **must** be in the workplace, they do not have to be in the same room as the supervised veterinary practitioner.

The supervisor must accompany the person being supervised if practice occurs elsewhere, e.g., a home or farm visit.

A veterinary practitioner providing direct supervision has principal responsibility for the standard of care provided to each individual patient seen by the person under their supervision.

Supervisors of persons who are training to acquire the competencies required for general registration (e.g., preparing to sit the clinical examinations of the Australasian Veterinary Examination) are encouraged to provide appropriate support in relevant clinical areas.

The level of responsibility for patient management which the supervised veterinary practitioner is allowed to take will be based on the supervisor's assessment of their knowledge and competence. The supervisor will ensure that the supervised veterinary practitioner consults their supervisor as directed. The supervised veterinary practitioner must consult their supervisor as directed.

The supervised veterinary practitioner must also seek early guidance and assistance if they have a problem or recognise that they have reached the limits of their professional competence.

## INDIRECT SUPERVISION

### Imposition of indirect supervision

The Board **may** decide that indirect supervision is appropriate for a veterinary practitioner to whom it has granted specific registration under section 7(1) of the VPA for one of the following purposes:

- to enable that applicant to undertake supervised study or training or a course approved by the Board at a tertiary institution (section 7(1)(a) of the VPA)
- to enable that applicant to fill a veterinary teaching or research position at a tertiary institution approved by the Board (section 7(1)(b) of the VPA)
- to enable an applicant to occupy a position in a public sector body or in a department or agency of the Commonwealth Government if the position requires the applicant to be a veterinary practitioner (7(1)(ba) of the VPA)
- if the Board is of the opinion that, in order to meet an identified need for a veterinary practitioner, it is necessary for a person having qualifications in the nature of the applicant's to provide veterinary services (section 7(1)(d) of the VPA)

In addition, the Board **may** decide that indirect supervision is appropriate for a veterinary practitioner to whom it has granted general registration who:

- has not practised recently or has only recently obtained their qualification
- has only worked in a limited field of practice
- is not familiar with the regulatory environment for veterinary practitioners in Victoria/Australia
- is subject to Board disciplinary proceedings or a determination relating to their professional conduct or fitness to practise.

### Responsibilities re indirect supervision

When a condition requiring indirect supervision is imposed on a veterinary practitioner's registration, the supervisor does not have to be physically present, but must be able to be consulted (e.g., by telephone or email) if the supervised veterinary practitioner requires assistance while practising.

While the supervised veterinary practitioner takes primary responsibility for each individual patient, a supervisor providing indirect supervision has broad responsibility for the standard of care provided by the person under their supervision.

The supervisor oversees the supervised person's practice and ensures that there are mechanisms in place to monitor whether the supervised veterinary practitioner is practising safely.

## 7. GENERAL RESPONSIBILITIES OF SUPERVISOR AND SUPERVISED VETERINARY PRACTITIONER

### SUPERVISOR'S RESPONSIBILITIES

In relation to the responsibilities listed below, reference to a supervisor means the principal supervisor, unless they are absent from the workplace. If a supervisor is absent from the workplace, responsibility lies with the secondary supervisor(s). Unless specified, the responsibilities listed below apply both to direct and indirect supervisors.

It is a supervisor's responsibility to:

- agree to provide supervision at a level determined by the Board, and maintain the prescribed level of supervision throughout the period of supervision
- discuss supervision requirements with the supervised veterinary practitioner before practice commences
- where there are secondary supervisors, ensure they maintain communication about the supervised veterinary practitioner with the principal supervisor and other secondary supervisors
- ensure the supervised veterinary practitioner is practising safely and is not placing the public or the health and welfare of animals at risk. This includes ensuring that the supervised person does not undertake activities unassisted without having the competence to undertake them at the standard expected of a registered veterinary practitioner. Competencies for providing safe care include:
  - how to assess an animal accurately
  - how to recognise the sick animal
  - how and when to refer an animal
  - safe and lawful prescribing
  - appropriate ordering of investigations and interpreting the results of investigations
  - treatment and management protocols
  - effective communication with animal owners and other staff, and
  - an understanding of relevant legislation
- assist the supervised veterinary practitioner to understand the regulatory environment governing and guiding the actions of veterinary practitioners in Victoria, e.g., introduce relevant laws, regulations, codes of practice, policies and guidelines
- if providing indirect supervision, give clear instructions to the supervised veterinary practitioner about how they can be contacted when the supervised veterinary practitioner is practising including after hours
- provide constructive feedback to the supervised veterinary practitioner, for example on any limitations the supervisor perceives may be affecting the supervised veterinary practitioner's practice
- address any problems identified
- notify the Board immediately if they have concerns that the supervised veterinary practitioner's performance, conduct or health is placing the public or the health and welfare of animals at risk
- ensure there are mechanisms in place to ensure the supervised veterinary practitioner complies with the conditions, limitations or restrictions imposed on their registration, e.g., to work in a specific field of practice or at a specific location



- notify the Board as soon as they become aware that the supervised veterinary practitioner is not complying with the conditions, limitations or restrictions imposed on their registration
- if requested by the Board, provide reports on the supervised veterinary practitioner's work performance to the Board in an approved format at intervals determined by the Board, e.g., every 6 or 12 months
- notify the Board within a period of seven days if they are no longer able, or willing, to provide supervision, or supervision at the required level
- cooperate with any investigation into the supervised veterinary practitioner's professional conduct.

### Consequences of inadequate supervision

A registered veterinary practitioner who has agreed to provide supervision may be considered to have engaged in unprofessional conduct if they do not provide an adequate level of supervision and/or fulfil their responsibilities as set out in this policy.

Noting that complaints from animal owners or the public are likely to be received about the supervised veterinary practitioner's conduct, the Board would likely investigate the complaint against that practitioner in the first instance. If matters relating to supervision arise during a preliminary investigation, the Board may initiate investigation of a supervisor's professional conduct.

### SUPERVISED VETERINARY PRACTITIONER'S RESPONSIBILITIES

In relation to the responsibilities listed below, reference to the "supervisor" means the principal supervisor, unless they are absent from the workplace in which case responsibility lies with a secondary supervisor.

It is the supervised veterinary practitioner's responsibility to:

- consult their supervisor about the management of patients as directed by their supervisor, and not provide veterinary services without the knowledge and consent of their supervisor
- consult their supervisor early if they have a problem
- recognise the limits of their professional competence and seek guidance and assistance from their supervisor when required
- familiarise themselves and maintain their knowledge of the regulatory environment governing and guiding the actions of veterinary practitioners in Victoria, e.g., relevant laws, regulations, codes of practice, policies and guidelines
- comply with all conditions, limitations or restrictions on their registration
- contact the Board if their supervision arrangements are not being met, e.g., if their supervisor is unable to provide the agreed level of supervision
- notify the Board if their supervisor indicates directly or indirectly that they are unable or unwilling to provide continued supervision (within 7 days of becoming aware of this), and
- **contact the Board to report and/or seek approval of any change to circumstances affecting their supervision**, including changes to:
  - their employment, e.g., their employment is terminated
  - their employer or workplace, e.g., they propose to change their employer or work at an additional location under the supervision of a second principal supervisor
  - their principal supervisor, e.g., their principal supervisor is leaving the workplace or they want to be supervised by a second principal supervisor at another work location or employer
  - their position or duties

- **before any changes relating to supervision are implemented**, obtain approval from the Board for proposed changes to supervision arrangements and related conditions, limitations or restrictions on their registration.

### Consequences of inadequate conduct by a supervised veterinary practitioner

A veterinary practitioner who the Board requires to be supervised is subject to:

- the same statutory obligations as other registered practitioners, including the requirement to meet appropriate standards of veterinary practice,
- the same proceedings as other registered veterinary practitioners if a complaint were to be made to the Board about their professional conduct.

A veterinary practitioner who the Board requires to be supervised may be considered to have engaged in unprofessional conduct if they do not:

- comply with the requirements of the conditions on their registration, and/or
- fulfil their responsibilities, as set out in this policy and in the laws, regulations, codes of practice and guidelines governing veterinary practice in Victoria.

Depending on the type of registration held, failure to comply with the conditions of registration may result in registration being cancelled.

Under section 7AA of the VPA, the Board may cancel the specific registration of a registered veterinary practitioner if the practitioner notifies the Board, or the Board becomes aware, that the practitioner cannot comply with a condition imposed on their registration. An example of not being able to comply with a condition would be if a practitioner's employment is terminated by their employer and a condition on that practitioner's specific registration restricts employment to that employer. The notification process for such cancellation is outlined in section 7AA of the VPA.

### EXPECTATIONS OF EMPLOYERS

The Board expects the supervised veterinary practitioner's employer to:

- ensure supervision is provided according to this policy
- ensure the supervised veterinary practitioner is provided with an orientation before they start practising in the position
- ensure that principal and secondary supervisors maintain adequate communication about the supervised veterinary practitioner with each other
- advise the Board if they have any concerns that supervision arrangements are not adequate or the supervised veterinary practitioner's performance, conduct or health is placing the public or the health and welfare of animals at risk.

## VERSION HISTORY

Document	Responsible persons	Revision number	Dates
Vetboard Victoria Policy: Supervision of Veterinary Practitioners	<b>Approval:</b> Board <b>Internal sign off:</b> General Manager <b>Maintained by:</b> Registration & Communications Officer	1.0	Approved: 1 May 2019 Review date: June, 2020
Vetboard Victoria Policy: Supervision of Veterinary Practitioners	<b>Approval:</b> Board <b>Internal sign off:</b> General Manager <b>Maintained by:</b> Registration & Communications Officer	2.0	Approved: 14 February 2023 Review date: June 2024