

### **1.1 PURPOSE**

The purpose of this policy is to provide guidelines to physiotherapists regarding both their legal and professional responsibilities in the way they use or supply medications to their clients.

### **1.2 SCOPE**

This policy applies to any person practising physiotherapy in NSW.

### **1.3 EXPECTED OUTCOMES**

This policy is to provide protection of the public in NSW, by encouraging the safe and effective use of medicines by physiotherapists. It will be used as a reference document in any disciplinary processes.

### **1.4 BACKGROUND**

Any medicines sold, supplied or used therapeutically by a physiotherapist should be done so with careful consideration. The medicine should have had its benefits documented in the same way as any other physiotherapy treatment. Physiotherapists need to ensure that they have the knowledge to recommend a medicine's use and appropriately inform their clients of the risks and benefits. The physiotherapist providing advice on medicines should ensure that they understand the medicine's actions, pharmacokinetics, indications, contraindications, precautions, dosage, overdosage signs, interactions, side effects, and whether there could be adverse interaction with the client's other medicines or medical conditions.

There are limitations as to particular drugs or medicines a physiotherapist may legally supply, or use therapeutically in the practice of physiotherapy. This is dependent in part upon which schedule, if any, of the NSW Poisons List includes the medicine (see latest edition of Guideline, TG 147 available on the Pharmaceutical Services Branch website). The Poisons List is not a static document. Medicines can be subject to scheduling changes or can be rescheduled. New medicines are also introduced into the Poison List on a regular basis.

### **1.5 DEFINITIONS**

For the purposes of this policy a medicine is taken to include:

1. Any substance in the Poisons List intended for therapeutic use.
2. Any other product that is intended for therapeutic use and is generally available.

The following definitions are taken from the Poisons legislation:

To *sell* a medicine includes to:

Sell whether by wholesale or retail and barter and exchange [and also includes dealing in, agreeing to sell, or offering or exposing for sale, or keeping or having in possession for sale, or sending, forwarding, delivering or receiving for sale or on sale, or authorising, directing, causing, suffering, permitting or attempting any of such acts or things.

To *supply* includes to:

- a) sell, dispense and distribute, and
- b) supply, whether free of charge or otherwise, by way of sample or advertisement, and
- c) supply, whether free of charge or otherwise, in the course of testing for safety or efficacy on persons or animals, and
- d) agree or offer to sell or distribute, and
- e) keep or have in possession for sale, dispensing or distribution, and
- f) send, forward, deliver or receive for sale, dispensing or distribution, and
- g) authorise, direct, cause, suffer, permit or attempt any act mentioned in paragraphs a to f both inclusive

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*Therapeutic use* means use in or in connection with:

- (a) preventing, diagnosing, curing or alleviating a disease, ailment, defect or injury in persons or animals; or
- (b) influencing, inhibiting or modifying a physiological process; or
- (c) testing the susceptibility of persons to a disease or ailment; or
- (d) influencing, controlling or preventing conception in persons; or
- (e) testing for pregnancy in persons; or
- (f) the replacement or modification of parts of the anatomy.

## 2.1 PROCEDURE

### The Poisons List

The Poisons List is the list of substances to which the Poisons and Therapeutic Goods Act 1966 and Regulation 2002 apply. It is divided into eight Schedules (Schedule 1 does not list any medications, so reference to it has been omitted), according to a pattern which is uniform in most respects throughout Australia, as follows:-

#### Schedule 2

**Substances on this schedule may not be supplied by a physiotherapist nor should they be directly recommended. The physiotherapist should refer the client to a pharmacist for advice about the suitability of purchasing the product.**

Schedule 2 substances are dangerous to life if misused or carelessly handled, but, should be available to the public for therapeutic use or other purposes without undue restriction. They may be supplied only by medical practitioners, authorised nurse practitioners, pharmacists, dentists, veterinary surgeons or persons licensed as "Poisons Licence Holders".

#### Schedule 3

**As in the above schedule, substances on this schedule may not be supplied by a physiotherapist nor should they be directly recommended. The physiotherapist should refer the client to a pharmacist for advice about the suitability of purchasing the product.**

Substances on this schedule are for therapeutic use and:

- (i) about which personal advice may be required by the user in respect of their dosage, frequency of administration and general toxicity;
- (ii) with which excessive unsupervised medication is unlikely; or
- (iii) which may be required for use urgently so that their supply only on the prescription of a medical practitioner, authorised nurse practitioner, dentist or veterinary surgeon would be likely to cause hardship.

Schedule Three substances may be supplied only by medical practitioners, authorised nurse practitioners, pharmacists, dentists or veterinary surgeons. Where such substances are supplied by a pharmacist, they must be personally handed to the client by the pharmacist and, with certain of these substances, special conditions apply.

**A physiotherapist may administer or use products in Schedule 2 or 3 with a client, provided the product has been obtained by the client as described above. The physiotherapist has a professional responsibility to ensure that he or she has the particular skills to administer or use the product. Dosage must be in accordance with the directions for use shown on the manufacturer's pack or the pharmacist's label. Physiotherapists may not purchase these drugs for use in their practice. Hence a physiotherapist would not be able to have a supply of salbutamol for use with their own clients.**

#### Schedule 4 (Restricted Substances)

**These products may not be supplied by a physiotherapist. They may be supplied by a doctor or by a pharmacist on the presentation of a prescription from a doctor only.**

Substances on this schedule are ones, which in the public interest, should be supplied only upon the written

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prescription of a medical practitioner, authorised nurse practitioner, dentist or veterinary surgeon. e.g. Allopurinol, Dextropropoxyphene, Prednisolone, Salbutamol respirator solution, Nitrous Oxide.

However, this does not prevent a physiotherapist from administering or using such products on a particular client provided the product has been obtained by the client from the Doctor or Pharmacist. Physiotherapists may not purchase or obtain these drugs for use in their practice (i.e. for administering to clients).

In administering the drug, the physiotherapist has a professional responsibility to ensure that he or she has the particular skills to administer or use the medication, and must administer or use it in accordance with the directions of the doctor (shown on the product's dispensing label).

Should a physiotherapist believe a client may benefit from the use of a Schedule 4 product, the client must be referred to a doctor for a decision.

### Schedule 5

**It would be expected that physiotherapists would not supply, or use these products with their clients.**

These are poisonous substances of a dangerous nature commonly used for domestic purposes which should be readily available to the public but which require caution in their handling, use and storage. e.g. Ammonia, hydrous sodium borate (Borax), Glutaraldehyde.

### Schedule 6

**It would be expected that physiotherapists would have no role in supplying or using these products with their clients.**

These are substances which should be readily available to the public for agricultural, pastoral, horticultural, veterinary, photographic or industrial purposes or for the destruction of pests.

### Schedule 7

**It would be expected that physiotherapists would have no role in supplying or using these products with their clients.**

These are substances of exceptional danger which require special precautions in their manufacture or use. e.g. Thallium, Strychnine, Cyanide.

### Schedule 8\_(Drugs of Addiction)

**It would be expected that physiotherapists would have no role in supplying or using these products with their clients.**

These are substances which are addiction producing or potentially addiction producing. Possession, supply, prescribing and use are strictly limited. e.g. Morphine, Pethidine.

### **Preparations containing poisons listed in two or more Schedules.**

If a product contains two or more substances, each being in a different schedule to the Poisons List, the provisions of the more restrictive schedule applies to the product. The schedule classification is clearly stated on the manufacturers pack.

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## **Products not included in any Schedule of the Poisons List**

There are no restrictions as to who can supply and use products that are not on any Schedule of the Poisons list as they are freely available through retail shops and therefore can be supplied by physiotherapists. e.g. analgesic rubs, most vitamins, most herbal preparations, diclofenac sodium gel, glucosamine sulphate, chondroitin sulphate.

The physiotherapist providing advice on unscheduled medicines should ensure they understand the medicine's actions, pharmacokinetics, indications, contraindications, precautions, dosage, overdose signs, interactions, side effects, and whether there are potential adverse interactions with the client's other medicines or medical conditions. They should ensure they give an information sheet regarding the medicine to the client.

Herbal preparations, which have been prepared specifically for a client by a herbalist, as distinct from a herbal preparation which has been purchased in the manufacturer's original pack, should not be administered to the client unless the physiotherapist has full knowledge of the contents. Such information may not be disclosed on the product label prepared by the herbalist.

While there is no restriction on selling products that are not on the poisons list (ie unscheduled), physiotherapists will need to exercise their professional judgment in doing so. Members of the public may not view purchasing a product from a physiotherapist in the same way they would view purchasing the same product from another commercial source. They may place a higher value on a product sold by a physiotherapist than by another commercial agent. Also they may not be as discerning in their product choice assuming the professionalism of the physiotherapist has made this judgment for them. The physiotherapist should exercise this professionalism in any sale to any purchaser.

## **3.1 REFERENCES AND RELATED POLICIES**

Reference should also be made to the:

Poisons and Therapeutic Goods Act, 1966 and the Poisons and Therapeutic Goods Regulation 2002,

**and** all published amendments to such Act and Regulations under that Act together with the Poisons List proclaimed under section 8 of that Act or the Guide to the New South Wales Poisons Schedules published by the Pharmacy Guild of Australia (NSW Branch).

These are obtainable from:

SALMAT  
Level 3, 2-24 Rawson Place  
Haymarket NSW 2000  
Phone: 1300 656 986 Fax: (02) 9324 1901

Further information may be obtained from;

Duty Pharmaceutical Adviser,  
Pharmaceutical Services Branch,  
NSW Department of Health,  
PO Box 103, Gladesville, 1675.  
Phone: (02) 9879 3214. Fax: (02) 9859 5165.

and from the Pharmaceutical Services Branch website:

[www.health.nsw.gov.au/public-health/psb](http://www.health.nsw.gov.au/public-health/psb) (and follow the links to "legislation" (for the Poisons List) or "publications" (for Guidelines etc)