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Cc:  
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Subject:

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Dear Professor Grenyer,

I am writing to provide feedback regarding the PBA's proposed guidelines on approved training programs in psychology supervision. As a relatively new and inexperienced supervisor, I am supportive of the Board's position on mandatory training for supervisors. I have also, as a clinician, benefited from the wisdom of a number of talented and inspiring supervisors, and believe strongly in the importance of supervision in training and ongoing professional development. However, I have a number of concerns regarding the Board's proposals, which are as follows:

1. **The proposed timeline:** The Board's consultation paper states that "*The proposed guideline will be finalised after the consultation feedback has been considered by the Board. The Board considers that this guideline should be in place prior to commencement of the national registration and accreditation scheme on 1 July 2010.*"  
. There are a number of serious problems with this guideline:
  - a) Given that the deadline for consultation feedback is 14<sup>th</sup> June, The Board has only two weeks to consider all feedback received and finalise the guidelines in view of this feedback. This is manifestly insufficient time to give proper consideration to the feedback received and concerns raised by stakeholders.
  - b) The guidelines state that supervisors must have completed PBA-approved training in order to supervise Psychology Interns, postgraduate psychology students or psychologists applying for specialist endorsement. However, such training is currently only in the planning stages, and is unlikely to be available for a significant period after July 1<sup>st</sup>. In order to prevent disruption to psychologists and intern psychologists currently receiving supervision, the requirement that all supervisors complete Board-approved training should be delayed until supervisors have had reasonable time to meet this requirement (e.g., within six months of PBA-approved courses becoming available in every state and territory).
2. **Cost of supervisor training:** the proposed guidelines do not mention the cost of supervisor training. However, given the requirement of at least 15 hours of direct teaching as well as assessment and the provision of feedback by trainers, the cost of undertaking supervisor training appears likely to be considerable. This is problematic given the central role of supervision in psychologists' training/professional development and the fact that many supervisors (especially supervisors of postgraduate interns) provide free supervision as a service to junior colleagues and the profession. The Board's guidelines on supervisor training should include a commitment to ensuring that the cost of supervisor training is reasonable, and guidelines as to the maximum cost that participants can be charged for this training across the country.
3. **Lack of grandparenting provisions:** the proposed guidelines do not suggest any "grandparenting" provisions for highly experienced, respected supervisors. Informal information channels have suggested that the Board's intention is to "grandparent" supervisors who have undergone State board-approved supervisor training (though this is not mentioned in the consultation paper). The lack of grandparenting provisions, or

the extension of grandparenting provisions only to supervisors who have completed state Board-approved training, is problematic because:

- a) it fails to recognise the importance to the discipline of senior, experienced supervisors. This includes a number of semi-retired clinicians who are likely to cease providing supervision rather than undertake expensive and time-consuming training in this area;
- b) “grandparenting” supervisors who have completed state Board-approved training would discriminate against supervisors from those states that have not required training for supervisors, and against supervisors from states such as NSW who have not completed Board-approved supervisor training as this was not relevant to the interns they were supervising (e.g., postgraduate psychology interns).

Given the above problems, I would suggest that the Board consider a “grandparenting” clause applying to clinicians with an endorsement in at least one area and at least ten years' experience in providing psychology supervision (to intern psychologists, postgraduate psychology interns and/or registered psychologists). Such clinicians could be considered exempt from any requirements regarding supervisor training. If the proposed timeline were to be adjusted so that other supervisors were given sufficient time to undertake Board- approved training (see point 1), no other grandparenting provisions would be necessary.

4. **Trainer qualifications:** the proposed guidelines state that *“All trainers must be psychologists who hold general registration and have endorsement in at least one area of practice.”* Given that trainers will be responsible for providing both training for and assessment of supervisors, a higher level of trainer qualifications would be preferable. For instance, prospective trainers could be required to have at least ten years' experience in the provision of psychology supervision, and to pass a Board-devised examination to ensure that they themselves possessed the core competencies that they would be responsible for assessing in other supervisors.
5. **Supervisor assessment:** The proposed guidelines state that *“Potential supervisors must be assessed across a number of domains using a range of techniques, including multiple choice and short answer examination, written responses to case studies and vignettes, and assessment of supervision sessions submitted on videotape or equivalent”*, and that *“The training providers will be responsible for the administration and scoring of the assessment to a standard approved by the Board”*. The guidelines provide very little information regarding the details of assessment of supervisors. In order to maintain standards and uniformity, the Board should be responsible for devising assessment tools to be administered to supervisors, and determining the minimum acceptable level of performance.
6. **Submission of videotaped supervision sessions:** The guidelines propose that *“Supervisory performance is to be measured through assessment of an actual supervision session submitted on videotape or equivalent”*. This proposal raises concerns regarding confidentiality, as supervision sessions frequently contain confidential information regarding patients (and, in some cases, the psychologist under supervision). This requirement should only be included in the guidelines following the development of a PBA code of ethics, and explanation of how the requirement could be imposed while protecting patients' and supervised psychologists' confidentiality.
7. **Research requirement:** the Board's guidelines suggest that *“Providers of Board-approved supervisor training programs will be required to engage in research in this area”*. This requirement is currently too vague. The nature of the research

requirement should be specified, with a view to ensuring that such research would contribute meaningful information to the profession without unduly inflating the cost of providing supervisor training.

Thank you for considering this feedback.

Sincerely,

Juliana Fong  
Clinical Psychologist.