

**Submission by the
Australian Psychological Society
to the Psychology Board of Australia**

**Public Consultation Paper
Revised guidelines for supervisors
and supervisor training providers**

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Introduction

The Australian Psychological Society (APS) welcomes the opportunity to comment on the Psychology Board of Australia's Public Consultation Paper "Revised guidelines for supervisors and supervisor training providers" released on 5 March 2018.

The APS is the largest national professional association for psychologists in Australia with almost 23,000 members. The APS Institute provides members and non-members with postgraduate-level psychology education and training programs, including the training of psychology supervisors. Specifically, the APS Institute offers Part 1, Part 2 and Part 3 supervisor training programs for new supervisors and Part 4 'refresher' supervisor master class training workshops for approved supervisors who want to maintain their current PsyBA supervisor-approval status.

The APS provided feedback to the 22 December 2017 - Preliminary Consultation Paper Supervision - earlier this year, and is pleased to see a number of our suggestions and proposed amendments implemented in the current Public Consultation paper.

Please find below the APS feedback and comments on the **revised guidelines for supervisors and supervisor training providers** on the seven specific questions (p.14).

1. Which option do you prefer – the status quo or the (two) new guidelines?

The APS prefers option two (the new guidelines).

2. What are the advantages and disadvantages of moving from the current guidelines and revocation policies to the draft guidelines

The APS agrees that separate guidelines for supervisors and for supervisor training providers is preferable to ensure clarity of requirements and reduced confusion for new or continuing approved supervisors.

3. Are there other specific impacts (positive or negative) from the draft guidelines that need to be considered? This may include impacts from the proposed combining of BAS categories and the associated alignment of the eligibility criteria.

The APS notes that there are many positive changes to the guidelines, such as:

- Reduced list of supervisor competencies
- The inclusion of a written reflection (including self-evaluation) of their recorded supervision session in the Part 3 training program
- Specification of the number of attempts (max 3) to pass a Part 3 training program
- Extending the deadline for completing Part 3 training following Part 2 training (3 to 6 months)
- Including the flexibility to provide Part 4 training via videoconference technology for rural/remote-based participants

4. Is content and structure of the draft guidelines helpful, clear, relevant and workable?

Yes

5. Is there any content that needs to be added to, deleted from, or changed in the draft guidelines?

The APS wants to highlight the negative impact of paragraph 1 on page 7 of the Draft Guidelines for supervisor training providers, and supports the removal of this paragraph from the final version of the guidelines.

The Board may approve non-psychologist trainers where supervision and/or training skills are exemplary (such as supervisors from related professions or trainers with learning and development qualifications). In the case of trainers delivering a master class on a specific topic, the Board may approve a trainer who is not a Board-approved supervisor or a psychologist but has particular expertise in the specific topic covered by the master class.

The APS proposes that the inclusion of non-psychologists as approved training providers and trainers undermines the intended scholarly enterprise to develop competencies and ethical practices specific to psychological settings. This is particularly problematic in terms of the **supervisor competency number 3** (Ability to assess the psychological competencies of the supervisee), which could negatively impact the safety of the public engaging in psychological services.

The APS proposes that non-psychology training providers and trainers, such as those with experience in non-health areas (e.g., engineering, law) or allied health areas (e.g., podiatry, physiotherapy, nursing, medicine) would not be cognate of the ethical issues related to psychological practice, specifically non-physical contact psychological assessments and treatments.

6. From your perspective, are there specific issues that are not addressed in this review that should be? This may include impacts on workforce or access to health services.

Although unrelated to these proposed new guidelines, the APS is concerned with the potential situation of many currently approved supervisors seeking to complete Part 4 training and lodge their documentation prior to July 1, 2018. The inability of the 17 approved supervisor training providers to cover the demand for Master Class workshops within the next few months could result in the psychology profession being deficient of approved supervisors for all categories of supervision requirements. This could impact on the future number of new registered psychologists.

The APS supports the PsyBA to extend the period for the completion of a Master Class workshop to 30 November 2018 for those approved psychologists who had a July 1 2018 'refresher' deadline. This date would align the updating of approved supervisor status with the registration period.

7. Do you have any other comments on the proposal?

To be consistent with the proposed modifications to avoid 'passive' language in the guidelines, we suggest a change in the word "may" to "must" (second sentence under heading **Outcome reporting**, page 6 of the Draft Guidelines for supervisor training providers).