Submission in response to Exposure Draft:

Guidelines for Supervisors and Supervisor Training Providers

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The Australian Clinical Psychology Association (ACPA) is grateful to the Psychology Board of Australia (PsyBA) for this opportunity to consult on the draft Guidelines for Supervisors and Supervisor Training Providers. ACPA members are most involved in the training of registered and provisionally registered psychologists in Board approved higher degrees in clinical psychology and in registrar programs for endorsement as a clinical psychologist. ACPA would like to develop a Board approved supervisor’s training program that could be offered at low cost to members and to other clinical psychologists not ACPA members. However, there is one major impediment to this.

The requirement that training providers review and critically review recordings of supervision sessions and retain these for five years is not possible for an organisation such as ours. If this requirement is retained we will not be able to offer supervision training and it will be necessary for our members to obtain training from other providers who are likely to implement extremely high fees to accommodate this demand. This creates an impediment to training for potential supervisors and substantially reduces resources for training clinical psychologists.

We support the principle of supervision of professional supervision and believe this has an important role in developing and maintaining supervisory skills. We suggest that direct supervision of all supervisors be incorporated into the supervision requirements for Continuing Professional Development (CPD) of all registered supervisors by the Psychology Board. A requirement of one hour/year of direct supervision by a peer supervisor through direct observation or review of recorded material would be more appropriate to maintain and develop skills and more manageable.

Furthermore, we would also like to point out a serious problem in one of the standards put forward by the PsyBA in the consultation document. The guidelines require supervisor to, “View active client files of the supervisee intermittently [emphasis added] as part of the supervision process.” This is not an adequate supervisory practice. It is essential that students learn to comply with legal and professional guidelines regarding reports, letters and case notes. During training these need to be reviewed by the supervisor to ensure compliance, particularly during training in a Board approved post-graduate program of study. While this standard may not be required in a registrar program in which registrars are fully registered, it is necessary for accredited professional training programs where students are provisionally registered or undertaking advanced accredited training as registered psychologists. Such supervisory oversight of students notes, letters and case notes is required by the Australian Psychology Accreditation Council (APAC) and most, if not all Ministries of Health. Conflicting requirements by the PsyBA risk a reduction in compliance at the higher level, and expose the public, students and supervisors to risk.

ACPA is grateful for the efforts of the Psychology Board to set adequate standards for the profession of psychology in Australia and appreciates the enormity of the work being undertaken. We also thank the Board for this opportunity to provide advice regarding supervision training for the profession.