

Attention Chair, Supervisor Consultation
Psychology Board of Australia

25 January 2012



Feedback to Supervision Consultation Paper

This letter is written in response for call for feedback to the Psychology Board of Australia's Consultation Paper 12 – Exposure Draft: Guideline for Supervisors and Supervisors Training Providers.

Caraniche is a psychological services consultancy, based in Melbourne that employs over 40 registered and provisional psychologists and offers over 20 supervised placements to graduate students each year as well as supervising internal and external provisional psychologists through the 4 +2 program. Caraniche is not only significantly involved in the supervision of provisional psychologists but is also a leading provider of supervision training in Victoria across the health, welfare and local government sectors and has provided supervision training to over 1200 participants since 2008.

We fully endorse a competency based approach to the supervision of provisional psychologists and are pleased that the Psychology Board of Australia is developing core competencies and accreditation processes for the training of psychological supervisors. Despite our general endorsement of the strategy being employed by the Psychology Board of Australia, we have a number of specific concerns or comments in relation to the consultation paper.

Accredited Training and Learning Outcomes

It is of concern that the psychologist's supervision training is being developed without reference to the Australian Training and Qualifications Framework (ATQF). Whilst it is unlikely that the ATQF competencies for clinical supervision would meet the needs of the psychology profession, the ATQF provides a useful framework for competency based training and should be used as the model for the development of accredited supervisor training in psychology. In line with the ATQF framework, it is our view that the Psychology Board of Australia should not only set the required competencies but also determine the required learning outcomes. This will ensure consistency across all training providers and create a platform for training organisations to recognise the training provided by others for the purposes of recognition of prior learning and transfer from one training provider to another.

Uncritical adoption of existing processes and standards

AHPRA and the Psychology Board of Australia appear to be expediting important processes by adopting the existing standard of one group or body and making it mandatory for all rather than developing a new and comprehensive standard based on an independent assessment of the best approach to supervisor training. The recent example of accepting APS college membership as providing automatic endorsement in specialist areas of

psychology has been fraught for the profession and the modelling of the supervision training framework on the current practice of two providers rather than looking broadly at the full range of training programs and models currently employed in Australia and internationally, is equally concerning. There are many examples of excellent supervision training programs that have been overlooked by the Psychology Board of Australia. In doing this, the Psychology Board of Australia significantly advantages two training providers whilst potentially denying Australian psychologists access to supervision training that has been independently verified as providing the best model of learning.

Qualifications of Trainers

It is our view that all trainers providing accredited supervision training should be registered psychologists. Psychologists and employers will be paying significant sums to become endorsed supervisors and are entitled to receive high quality and expert training in the practice of psychological supervision. Given that under the current model there are only two days of face to face training, it is our view that this should always be provided by an experienced registered psychologist and endorsed supervisor to maximise learning outcomes for the participants. Highly skilled and experienced supervisors from other professions will not have the depth of understanding of psychological practice and processes and ethical responsibilities to effectively provide the training to a skilled and experienced group of psychologists.

Recognition of Prior Learning

In the absence of approved Supervision training in Victoria, Caraniche has funded supervision training for its supervisors and supervision trainers from internationally recognised supervision trainers such as Michael Carroll. These staff all have Certificates in Supervision or Advanced Certificates in Supervision awarded by the Centre for Supervision in the UK. We believe there should be a process for Recognition of Prior Learning for psychologists in states other than NSW and Queensland who proactively sought high quality supervision training from internationally recognised supervision trainers.

Long Term Viability of Clinical Supervision Requirements

The Psychology Board of Australia has implemented some very significant changes to the process of gaining psychological registration and the supervision requirements of 4 +2 and higher degree students. Caraniche is a significant provider of supervised placement to Masters and Doctoral level psychology students (over 20 students per year) and is under considerable demand from Universities to take greater numbers of students because of our commitment to excellent clinical supervision. However, we are concerned that many of the Psychology Board of Australia's requirements will place unreasonable cost and time demands on supervising psychologists, such that it is no longer financially viable for individual psychologists, group practices or organisations like ourselves to take on placement students. By way of example, to service our current level of student placements under the new rules we need to release and fund at least eight psychologists to complete the training – a significant impost on our organisation for limited financial return. The impact of this upon University courses and the profession more broadly will be significant. Whilst we fully endorse the need for clear standards and learning outcomes in the supervision of placement students we believe it will be necessary for the Psychology Board

of Australia to adopt a more flexible approach to the current rules in order to ensure psychologists and organisations remain committed to taking psychology graduate students on placement.

References to geographical location

There are references within the consultation paper (page 15) to the geographic location of training providers, indicating that preference will be given to regional providers of supervision training. This implies, but does not clearly state that supervision training providers may be limited to a geographical area or to obtain endorsement may have to commit to providing training in regional areas. It is important that the Board clarify whether:

- a) it intends to restrict the number of organisations it will approve to provide supervision training
- b) approved providers of training supervision will only be able to provide training in a limited geographic area
- c) all approved trainers will be required to provide training in regional areas.

It would be our preference that there are no limits or restrictions placed upon approved training providers so that psychologists had some choice over who they received their supervision training from, rather than being limited to a single provider based upon geography.

Approval Process

We ask that the Psychology Board work quickly to clarify its application process for becoming an approved supervision trainer. With only two providers currently approved and less than 18 months before the new system comes into effect, it is highly unlikely there will be enough training places available to ensure that all current supervisors have met the requirements for ongoing endorsement without more training organisations being approved.

We are also concerned that one of the currently approved training providers is promoting their training across Australia, to the detriment of other training providers. Given that Caraniche and other providers of excellent supervision training had no opportunity to seek early approval, the Board's actions have significantly disadvantaged these providers.

Thank you for considering our feedback. We look forward to being advised of the process for submitting our supervision training program for Board approval.

Yours sincerely,



Jacinta Pollard
Psychologist & Managing Director
Caraniche