Professor Brin Grenyer,
Chair, Psychology Board of Australia

Dear Professor Grenyer,

**Re: Guideline for Supervisors and Supervisor Training Providers.**

Thank you for the opportunity to respond to the Psychology Board of Australia’s Consultation Paper 12, Guideline for Supervisors and Supervisor Training Providers.

Psychological Sciences and Statistics at Swinburne University of Technology offers Master of Psychology and Doctor of Psychology programmes in both Counselling and Clinical Psychology, all of which hold full accreditation with the Australian Psychology Accreditation Council (APAC).

We arrange approximately 100 placements for our students each year across government, private and non-government organisations across Victoria. We are very proud of the quality and dedication of our supervisors in these agencies and acknowledge that these placements are offered often solely at the good grace of supervisors and at the goodwill of the agency. Provision of supervision and placement opportunities to students is often not the core business of these organisations and requires an ongoing commitment to the giving of time and expertise for little tangible reward. We are therefore concerned that the introduction of anything that makes this process more onerous will result in the reduction of placement opportunities.

While many of our supervisors may want to continue in their role and undertake training this would require significant time and monetary commitment from themselves and their organisation. Supervisors will have to be highly motivated to continue in this role if they are to commit to the proposed regime of 7 hours of preparation, 14 hours of face to face training and submission of assessment and then, ongoing updating of training every five years. Many organisations may not be predisposed to commit to providing this much leave for study and would be reluctant to provide funding support to training of this nature. We expect that this would have the greatest impact on some of the smaller agencies with whom we work.

Here in Victoria many of our supervisors have already been registered as supervisors under the previous state registration board system – meaning that they had to show evidence of previous supervision training and commitment to ongoing professional development in the area. Under the current proposal supervisors are being asked to repeat this training and the, not insignificant administrative task of registering and logging training. The current proposal ignores their already substantial training and experience in the area of supervision.

Training of all supervisors in a recognised and accredited way is a principle that we agree with and aspire to, and we would aim to have all our supervisors offering a consistent approach to and standard of supervision for our students. However, this would take more time...
and resources to achieve than that outlined in the proposal. We are concerned that in the current climate and in the short term, the proposal as it stands will seriously impact on our already limited ability to provide placements for our students. This in turn will impact negatively on the number of university training places offered.

We also note that the date for registration as a supervisor is 18 months away, and there is as yet no accredited training available in this state.

We would therefore propose:

- Consideration of recognition of previous training of supervisors and an associated reduction in the hours of training required for registration as a supervisor.
- An extended grace period for registration as a supervisor for those supervising students completing higher degrees.
- A plan for funding to support Universities and agencies providing placements to assist supervisors in undertaking training and the added administrative tasks of registering as a supervisor.
- Recognition of supervision of higher degree students as active CPD hours, which could be capped at a maximum number of hours.
- Ongoing training be concerned with deepening the understanding and practice of supervision, not just simply an updating of skills, and therefore being open to a broader range of training possibilities.
- Consideration be given to flexibility in delivery of training, including the option of online training.
- Support for universities to offer supervision training and monitor the quality of supervision provided to students.
- That the PBA implement a face to face consultation process to obtain the evidence necessary to understand the difficulties outlined above.

In summary, we consider the Board’s proposed changes to be significant and have the potential to impact severely on the ability of the University to provide the training it is accredited to provide. We recognise the significant commitment and effort of our supervisors to the training of higher degree provisional psychologists and continue to look for ways to support and assist them in this endeavour.

Yours sincerely,

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