

**Chair
Supervisor Consultation
Psychology Board of Australia**

27/1/2012

Dear Madam/Sir,

Thank you for the opportunity to comment on the PBA's **Consultation Paper 12: Exposure Draft: Guidelines for Supervisors and Supervision Training Providers.**

I should say that the following comments are made in my capacity as an individual psychologist, and do not represent the views of any of the organisations with which I currently hold an appointment.

My views are informed by some 30 years of experience which includes direct and extensive experience of delivering psychology assessment and intervention services, convening and lecturing in postgraduate psychology training programs, directing psychology clinical services, and consulting to a variety of organisations and bodies. In particular my views are informed by very extensive experience in supervising postgraduate trainee psychologists as well as early and mid career psychologists wanting to develop particular expertise. Whilst much of my experience involves supervising neuropsychologists, it also includes clinical psychologists, educational psychologists and generic four year trained psychologists.

I commend the Board for addressing the important issue of supervision and in particular how the standard of supervisors may be established and maintained however I believe that the current proposal embodied in Consultation Paper 12 is misguided in the extreme and has the potential to cause a significant loss of competent and experienced psychology practice supervisors and thus lead to a shortage of qualified psychologists in the workforce in a fairly short time.

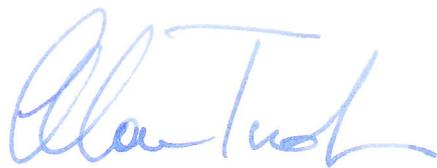
In summary some of my main concerns are as follows:

- Given the fundamental changes being proposed the date of 30 June 2013 to transition to the new arrangements is far too soon and should be extended to 31/12/13 or 30/6/14. It has come to my attention that many experienced psychologists currently supervising were not aware of this far reaching proposal due to the lack of effective communication with registered psychologists and the release of this Consultation Paper near the end of the year. Such a revised transition date, when combined with a more effective alert for psychologists, would allow a more meaningful consultation with the profession.
- In practical effect the proposal seems to be arguing for an unwieldy, time consuming, and potentially costly supervisor training program. There seems to be no awareness that psychologists in the public sector would probably not be funded to attend such training [and may even have to take unpaid leave to

attend]. Psychologists in the private sector would have no incentive at all to engage in supervisor training. The latter group is particularly important in view of the steady exodus of experienced psychologists from the public sector over the last decade.

- The proposed "structure and length of training" [cf p 8] gives specific substance to the the unduly onerous nature of the proposal. The 3+ days [7 + 14 hrs] involved in "preparatory work" and "direct face to face instruction" simply may not be feasible for a supervisor to do.
- The "systematic assessments..focussed on competency attainment ... including e.g. direct observation ...submission of videotape ...a short test" also may be so impractical and potentially costly that current supervisors and those [at present] wanting to become supervisors would elect not to do so.
- The Consultation paper's section on the competency of the Supervision trainers (Attachment B) is quite concerning. Whilst there are some sensible points about the description of content a potential provider may include and how they would deliver it, it seems that an organisation could be an accredited Trainer of Supervisors with only ONE psychologist involved with the training!
- Universities and other bodies charged with the task of training people and accrediting them for practice have long recognised the principle of "Recognition of Prior Learning [or Competencies]". From my reading of the Consultation Paper it would seem that there is no provision at all for RPL/C. This is a major error of judgement given that there are many highly competent psychologists in this country currently giving high quality supervision to trainee and practising psychologists. These people's supervisory skills should not be lost to the profession and the community.

Yours sincerely



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