

Dear Chair, Psychology Board of Australia

RE: Guideline for Approved Training Programs in Psychology Supervision

I am writing in response to the invitation to provide comments on this guideline. I have various concerns about what has been proposed, as follows:

1. It seems it is proposed to introduce these guidelines on 1st July 2010 even though they were only published on 17th May 2010. We regard this as a woefully short period of time for consultation and action over such important changes to regulations for the supervision of psychology interns.
2. We assume that when this guideline is introduced, any current supervisor who has not completed a Board-approved training program will be obliged to cease supervision. A recent survey of post-graduate trained psychologists in our Area Health Service suggests that only a minority have completed such training. Since psychology interns may not continue to provide services if they are not receiving supervision, this means that many clients would suddenly have their psychology services withdrawn. We would regard such an outcome as grossly unethical, so we would urge the PBA to re-consider its timeline.
3. If the majority of the Clinical Psychologists who currently supervise students undertaking postgraduate training at the University of Newcastle are prevented from continuing their supervision, then the University will be unable to honour its undertakings when the students enrolled in their degrees.
4. An earlier consultation paper from the PBA contained the following:-
"Supervisors who have not fulfilled the requirement to have completed a Board-approved training program in psychology supervision but meet all other requirements will be granted approval until 30 June 2013. This will allow the development of programs in those states and territories that do not currently have Board-approved training programs to put in place such programs." Such a provision is not mentioned in the Guideline of 17th May 2010. Besides, it does not address the predicament of states, such as NSW, which have had Board-approved training programs in place for a while.
5. When the NSW Psychologists Registration Board introduced compulsory Board-approved training for the "4+2" route to qualification, a transition period of two years was permitted. That is, potential supervisors were allowed two years in which to undertake the training. We would urge the PBA to consider a similar arrangement for the supervision of postgraduate students now.
6. The small survey in our Area Health Service showed that the majority of the psychologists who responded would not be willing to bear the costs of Board-approved training even if they could do the training in work time (only 1% were willing to bear the costs and do it in their own time). This obstacle might be overcome if University staff were to become trained as providers of supervisor training and then the training were offered at no cost to the supervisors of the

postgraduate students. However, even if the associated costs were approved by the University, this process would take time. When the NSW Psychologists Registration Board introduced compulsory Board-approved training for the “4+2” route to qualification, the Board provided the training for free for the first two years. We would urge the PBA to consider a similar arrangement for the training of supervisors of postgraduate students now. The fundamental problem is that there is little incentive for busy clinicians in the public sector to use their own money and time to equip themselves to become even busier in their work through supervision of students.

7. It seems that supervisors will need to do training and be endorsed in the speciality area in which they are supervising. There is likely to be a time lag in getting all supervisors endorsed. Therefore the Board needs to allow a period of grace there as well if they require supervisors to be endorsed.
8. There is no mention in the Guideline of a "grandfather" provision. Does this mean that no amount of previous experience of supervising interns, and no amount of previous attendance at, or provision of, workshops for supervisors will be taken into account?
9. It seems that most of one day of the Board-approved training for the “4+2” route to qualification is taken up with the paperwork required by the “4+2” route. This would not be relevant to Clinical Psychologists who provide supervision only to students of university-based postgraduate degrees. Therefore, the two days of training for such supervisors appears excessive.
10. Other questions which occur to us include: Would providers of supervisor training be regarded as competent to train clinical psychologists even if they weren't clinical psychologists themselves? Would the training be completely generic, so that, for example, it would be presented as equally applicable to Organisational Psychologists as Clinical Psychologists? If so, we wonder how a provider of training who is an Organisational Psychologist could be expected to teach the assessment of the competencies of interns studying Clinical Psychology, and vice versa.

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