

10<sup>th</sup> September 2010

Professor Brin Grenyer  
Chair  
Psychology Board of Australia  
GPO Box 9958  
MELBOURNE  
VICTORIA 3001

Dear Professor Grenyer

**Submission in response to the proposed revisions to the guidelines on areas of  
practice endorsements: August 2010**

Thank you for the opportunity for us to respond to the proposed revisions to the guidelines on areas of practice endorsement. The Institute of Clinical Psychologists (ICP) represents clinical psychologists in independent practice in Western Australia. In the main, the membership of ICP consists of the most senior members of the clinical psychology profession in Western Australia. Because of this seniority, many members are involved in supervision.

**Difficulty responding to the Guidelines**

ICP finds it difficult to respond to the proposed revisions because the requirements to be a supervisor have yet to be detailed by the PBA. Without this requirement, it is unknown how many supervisors will be available in Western Australia and therefore whether the wishes of the PBA with respect to supervising new graduates are achievable.

What has been detailed with respect to the requirements to be a supervisor is the necessity to complete a training course involving 30 hours (15 hours contact time) by 2013. These requirements are considered onerous and not necessary. It is also unclear who will design such a program for experienced supervisors.

Many of our members have been long time supervisors who have had to meet high standards required by the Psychologists Board of Western Australia. As evidence of the high standard of competency required by Western Australian supervisors, the PBA is referred to the checklists published on the Psychologists Board of WA website that must be satisfied.

### **Impact of Loss of supervisors**

In the event that there is not a grandfather clause or the training requirements are too onerous, there has been discussion amongst senior members about ceasing supervision. The ultimate impact of this would be on manpower issues. We understand that published on the defunct Queensland Psychologist Board website was a paper which detailed the loss of available supervisors when that Board made changes which were unacceptable regarding requirements to be a supervisor. As the web site is defunct, we are unable to verify the outcome of the research.

### **Recommendation**

*We would recommend that the PBA establish a grandparenting provision for experienced supervisors and senior clinical psychologists who have 10 years or more of clinical practice.*

### **Point 3.2 Definition of Psychological practice**

Whilst we concur that psychological practice involves nonclinical duties, it is not clear from the consultation paper if it is expected that these must be part of the supervision. Often supervisees who approach private practitioners for supervision do so because they seek specific skills that have been developed by the potential supervising clinician.

More often than not, these skills do not include non clinical duties, such as policy formulation or matters associated with administration. The skills sought by registrars from private practitioners are those associated with clinical practice.

It is also the case that registrars, particularly those who are advanced, such as DPsych/PsyD students, only seek those supervisors with very specific skills sets.

The reality of what registrars seek from private practitioners seems very different from the definition as given at point 3.2. Furthermore, the definition does not appear to be consistent with the following paragraph in which it is stated that a minimum of 176 hours per annum must be direct client contact that involves psychological assessment, intervention and prevention.

### **Recommendation**

*The definition of psychological practice be revised to emphasise clinical relevancy.*

### **Point 3.3 Lack of apparent flexibility**

It is noted at point 3.3 that a registrar can be supervised for a maximum of 25% of the registrar program by a supervisor in a different field. This restriction of 25% appears to limit flexibility for registrars to gain advanced skills and experience across several clinical treatments (e.g. humanistic, cognitive behavioural, psychodynamic), client age groups (e.g. child, adult, aged), and contexts (e.g. inpatient, outpatient, private practice).

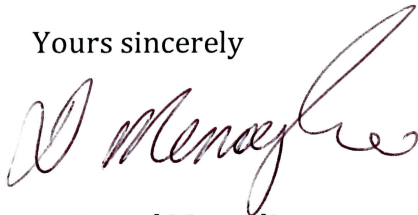
It would appear desirable for the public that graduating registrars have as many advanced skills as possible in a range of clinical treatments, client age groups and contexts.

*Recommendation*

*The PBA reconsider the guidelines that restrict supervision to a maximum of 25% of the registrar program to a different supervisor.*

We trust the above comments and recommendations are helpful to the PBA.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D Menaglio', with a stylized, flowing script.

Dr Darryl Menaglio  
**Chair ICP**