

Comments on Consultation Paper on Registration Standards and Related Matters (Psychology Board of Australia, 2009)

My comments are based on my experience with training and supervision of Psychology Interns in a variety of contexts:

- Director (1992-1996) of Master of Clinical Psychology program at Macquarie University
- Set up and Directed (2000 – 2006) PG Diploma in Applied Psychology at Macquarie University. This is a one year full time (equivalent to new 5th year option) or two year part time program designed to meet requirements for Psychology registration in NSW through 4+2 program.
- Provided supervision (principal, secondary and/or group) for approx 200 Interns (2000 – 2007)
- Developed and delivered the 2 day supervision workshop approved by the NSW Board as the requirement for authorisation as a supervisor (2006 – 2009)

Note possible conflict of interest: given that I hold the current contract with NSW Board to deliver the supervision workshops, I have an invested interest in the proposal for Board-endorsed supervisors.

1. Continuing Professional Development (Section 2.4)

I am frequently surprised by the apparent lack of updated skills/knowledge displayed by Psychologists who attend the 2 day supervision workshop (all have been registered for 3 years). In my view, mandatory professional development is essential to ensure safety for the public. Two comments on the proposed CPD regarding interactive programs and consultation:

1a. Interactive CPD The APS has recently changed the PD requirements from 60 to 90 points per 2 years. Professional development hours are credited with 1 pt unless they involve pre-reading, an interactive experience and some form of post-assessment in which case they are credited with 2 pts..

Recommendation 1a: I suggest that the Psychology Board of Australia increases the number of annual CPD points from 30 to 45 or 50 and adopt an equivalent system to the APS in terms of 2 points per hour for interactive PD experiences. Three reasons for this suggestion:

- 1) An interactive format ensures that participants get involved and pay attention (all I have to do in a supervision workshop to wake up a tired group is to say that the material will be in the post-test!)
- 2) If interactive formats attract more PD points it will motivate presenters to restructure their programs to provide more effective learning experiences.
- 3) Many Psychologists are members of the APS and it would be simpler and easier for all parties if the same requirements were set by both APS and the Psychology Board of Australia

1b. Supervision versus Consultation The consultation paper proposes that 10 hours of CPD must be individual supervision. Supervision is defined as “peer consultation with a psychologist for the purposes of professional development and support in the practice of psychology, and includes a critically reflective focus on the practitioner’s own practice” (p. 32). In my view, it is essential that Psychologists engage in regular review of their work and the use of the term “critically reflective focus” is apt for best practice in professional development consultations. However, care must be taken in distinguishing between “supervision” and “consultation”. This distinction is emphasised in the NSW supervision workshops. An Intern is accountable to their supervisor for their work and a supervisor is legally responsible for the work of the Intern they supervise. On the other hand, a

Psychologist who consults another Psychologist is not accountable to that consultant for their work and the consultant is responsible only for providing a competent, professional consultation. The consultant does hold responsibility to respond or report appropriately if there is evidence of incompetent, dangerous, illegal or unethical practice by the person who consults them, but this same responsibility holds for any knowledge a Psychologist has of any colleagues' work and is not a specific responsibility of the role. These issues of legal responsibility/accountability can cause concern to Psychologists who are seeking peer "supervision" (i.e. consultation).

Recommendation 1b: I suggest that the Psychology Board of Australia either change the term "supervision" to "consultation" or extend the definition of "supervision" to specify that the consultant is not responsible for the work of the Psychologist (except for standard reporting requirements) and that the Psychologist is not accountable to the consultant for their work.

2. Requirements for General Registration (Section 3)

2a. Complicated Requirements The current NSW requirements are very complicated. It takes several hours just to introduce the rules during workshops and they are too complicated for participants to take them all in. The result is that many errors are made in applications and reports to the Board and Interns are disadvantaged by these errors. At first glance the proposed national rules are simple:

- 2 hrs per week of supervision
- two-thirds individual and the rest group or individual
- three-quarters Principal Supervisor and up to one quarter Secondary Supervisor

However, when these general rules are broken down for a two year program they become:

- 176 hours supervision @ 2 per week for 88 weeks
- 118 hours individual supervision plus 58 hours of individual or group supervision
- 132 hours with Principal Supervisor plus 44 hours with Secondary or Principal Supervisor

These numbers could get very confusing. The fixed "2 hours per week" could also be difficult to implement on a weekly basis, but could be more easily implemented on an average basis.

Recommendation 2a: I suggest that the Psychology Board of Australia keeps the rules simple and flexible. For example, perhaps the Board could specify 8 hours per four week period of supervision of which at least 4 hours must be with Principal Supervisor at a rate of one hour per week, while the other 4 hours could be spread or blocked (e.g. 2 x 2 hours) and could be with Principal or Secondary Supervisor and could be group or individual supervision. Reporting could then be in 4 week blocks (with 10 blocks per year; 4 – 6 blocks on each 6 monthly reporting form).

2b. Assessment Criteria The current NSW requirement is that the criteria for assessing competencies is a judgment call by the supervisor. This allows for wide variation in criteria. For example, in each supervision workshop there will be someone who would sign off on the WAIS if the Intern made a mistake in their presentation but said they understood what the mistake was and how to correct it, and someone else who would only sign off on the WAIS if the Intern made no mistakes in at least 3 presentations. The rest of the participants are usually spread between these two extremes. I appreciate the difficulties in being prescriptive on criteria, given the wide range of areas in which Psychologists practice and the many different factors within each placement. Obviously, specifying tight criteria on each competency is not desirable. However, a range of criteria (e.g. "no errors" or "at least two presentations") could be provided to ensure a common basic standard across Australia.

Recommendation 2b: I suggest that the Psychology Board of Australia specify a criteria range for each competency with the option for supervisors to give a justification when reporting if they consider it necessary to make an assessment outside of the criteria range.

3. Endorsement of Supervisors (Section 5)

3a. Specifications for Supervision Training “Endorsement” is simply a formal method for the Board to allow a Psychologist to supervise an Intern. Given that it is unethical to practice outside of one’s areas of competence, it is obviously necessary for all supervisors to have developed skills in supervision and thus, the Board needs evidence of such skills before formally “endorsing” or informally “allowing” a Psychologist to take on the highly responsible role of supervisor. The issue, therefore, is not so much whether or not to establish formal endorsement, but rather, the criteria for such endorsement (or permission to supervise). Specifications are needed so that each state Board can approve local supervision workshops.

Recommendation 3a: I suggest that the Psychology Board of Australia provide specifications for supervision workshops. The specifications need to be broad enough to allow different workshops to be developed by different presenters for particular groups (e.g. university versus 4+2 programs), but specific enough to ensure an equivalent basic standard and content.

3b. Length of Supervision Training The consultation paper proposes a 2 day workshop for initial endorsement. The current NSW workshops are of 2 days duration; they are very long and very packed. Frequent feedback is that there is too much material in too little time. Supervision is a complex skill and it takes at least 2 days to provide the basic skills training. It is difficult to achieve even basic competence when all of the Board’s requirements and forms also need to be included in the workshop (needing another 6+ hours). Although an increase to 3 days training might discourage some Psychologists from becoming supervisors, it is evident from the NSW experience (with almost twice as many authorised supervisors as provisionally registered psychologists) that a drop in the number of endorsed supervisors would not disadvantage Interns. Furthermore, an increase to 3 days might result in only the more committed Psychologists doing the training, thus increasing the quality of supervisors.

Recommendation 3b: I suggest that the Psychology Board of Australia sets a requirement of 3 days of supervision training for endorsement as a supervisor. These days could be blocked as a 3 day workshop (for new supervisors), and also presented as a 2 day supervision skills workshop and a 1 day Board requirements workshop for those who need or wish to separate the components (e.g. the 1 day workshop could be an update on national requirements/forms for currently authorised supervisors and would meet the 5 hours of supervision focused CPD)

3c. Supervision Knowledge and Skills Assessment The consultation paper proposes that supervision skills be “rigorously assessed”. The current test for authorisation as a supervisor in NSW is done at the end of each day of the workshop. It comprises three scenarios (one on day 1, two on day 2) that assess general supervision principles. It is self-scored and employed as a training method in two ways: a) the issues that are important to be learned are highlighted in the workshop (“take note of this section – you’ll need it for the test”), and b) by self-scoring the participants get immediate feedback on the areas they need to develop. Only a pass mark is needed for authorisation. A more difficult test and a higher pass mark are needed if knowledge is to be rigorously assessed.

I understand that in Queensland the assessment includes a video of a supervision session. It is obvious that some form of observation of supervision skills is necessary for rigorous assessment – a video is a practical way to implement this.

Recommendation 3c I suggest that the Psychology Board of Australia requires a written test of supervision knowledge that is both self-scored (for feedback) and check scored by an

independent person (for accuracy). This test needs to assess all the important issues including ethical/legal aspects of supervision and the pass mark needs to be set higher than 50%. I also suggest that the Board requires a video of a supervision session for assessment of supervision skills. As is currently the case in Queensland, the cost of these assessments can be charged to the Psychologist seeking endorsement as an extra to the cost of attending a supervision workshop.

3d. Endorsement of peer “supervisors” The consultation paper proposes that for a Psychologist to provide CPD supervision endorsement as a supervisor would be encouraged but not required. Noting the distinction between “supervision” and “consultation” (1b above), CPD “supervision” would generally be consultation. Furthermore, supervisors of Interns need to be familiar with all the Board’s requirements and be skilled in assessing competencies and reporting to the Board. None of these skills are needed to provide a consultation to a fully registered Psychologist. As such, endorsement as a supervisor of Interns is not necessary for CPD consultation with a registered Psychologist. However, peer consultation requires the skill of being able to facilitate a colleague’s critical reflective focus and, if the CPD consultations are to occur in small groups, the group facilitator needs skills in group process (or all participants need group skills if it is a peer consultation group).

Recommendation 3d I suggest that the Psychology Board of Australia ensures that workshops are available for Psychologists to develop peer consultation and group process skills. I further suggest that the Board reminds Psychologists that it is unethical to practice outside of their areas of competence, therefore, it is unethical for them to provide peer consultation unless they develop these skills.

3e. “Supervision” of supervision The consultation paper proposes that 5 hours of the annual CPD must be specific to psychology supervision to retain endorsement as a supervisor. Some supervisors would choose to attend workshops (e.g. ethical/legal issues in supervision or specialist workshops on supervision from perspective of their therapeutic orientation) but others might prefer to seek “supervision” (actually consultation) of their supervision for some or all of these 5 hours. In such situations it is important that the “supervisor” be fully aware of the Board’s requirements for supervision of Interns and that they have skills in consultation-of-supervision.

Recommendation 3e I suggest that the Psychology Board of Australia allows consultation-of-supervision as one form of supervision-focused CPD points. I further suggest that only Board endorsed supervisors should be permitted to provide such consultations and that the Board ensures that workshops are available for supervisors to develop consultation-of-supervision skills.

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