

# APS Response to Consultation Paper 12 Exposure Draft: Guidelines for Supervisors and Supervisor Training Providers

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APS Contacts:

Professor Lyn Littlefield  
Executive Director  
[l.littlefield@psychology.org.au](mailto:l.littlefield@psychology.org.au)

Mr. David L. Stokes  
Senior Manager Professional Practice  
[d.stokes@psychology.org.au](mailto:d.stokes@psychology.org.au)

Dr. Leah Collins  
Policy Officer Professional Practice  
[l.collins@psychology.org.au](mailto:l.collins@psychology.org.au)

# **Guidelines for Supervisors and Supervisor Training Providers**

## **Introduction**

The APS supports the notion of providing evidence-based standardised supervisor training, however, argues that the PsyBA's proposed content, structure and length of delivery is excessive, onerous and does not respect prior learning, experience or skills of registered psychologists who already provide supervision. It is imperative that the PsyBA develop training that is respectful of skills and accessible in terms of both time and cost.

Supervisor training must be flexible, innovative and incorporate eLearning opportunities to ensure it is accessible and sustainable in the future and allow psychologists the opportunity to easily incorporate training into their working lives. Without a more flexible and adult-learning approach the PsyBA risks alienating skilled psychologists who are unable to meet the excessive requirements of the proposed format. The current requirements are not conducive to increasing the number of skilled supervisors available within the profession but rather will limit and discourage those who provide supervision. Such a consequence will increase risk to the profession and the public in that if the number of supervisors is too limited, registration becomes restricted and substitutes will emerge to replace psychologists. By addressing the specific and relevant sections of the Consultation Paper, the APS suggests the following revisions to the proposed supervisor training.

## **Section 3: Structure, Length and Delivery of Supervisor Training**

### **3.1 Structure and Length**

#### *Recognition of Prior Learning and Experience*

The APS urges the PsyBA to embrace the adult education model of pre-assessment, identification of learning needs, learning then assessment. The discipline of psychology exemplifies an appreciation that people learn at different rates and have different baseline knowledge levels. As such, at a minimum, psychologists must be given the opportunity to be accredited for their prior training, skills and experience in supervision. The PsyBA could develop formal criteria and brief assessment, not unlike establishing prior learning and experience to achieve endorsement, and acknowledge the already-existing workforce of skilled supervisors who support the developing psychology workforce. Psychologists whose knowledge meets the PsyBA's criteria should not be expected to re-learn or be re-assessed regarding their knowledge or skills set. With an appreciation of standardised assessment, skilled supervisors should not be required to complete the Foundation Supervisor Training (illustrated below) but rather only be required to complete the Revision Supervisor Training.

#### *Foundation Supervisor Training*

The APS proposes the Foundation Supervisor Training as the introductory training for all new supervisors and for those without prior learning and experience and should be comprised of the following Components A, B and C:

- A) 7 hours of preparatory work with utilisation of eLearning facilities (e.g., reading, reflective practice, online interactive training);
- B) 7 hours of face-to-face skills consolidation workshop; and
- C) Assessment of competency:

- A 30-60 minute recorded, real or role-played, face-to-face supervision session;
- Completion of a self-assessment checklist of that session.

Components B and C must be completed as independent learning modules following the successful completion of component A. The APS proposes that Foundation Training Component A could be offered independent of Components B and C. That is, a psychologist could complete Component A with Provider X and complete Components B and C with Provider Y.

The APS urges the PsyBA to ensure training providers are required to utilise flexible and online learning methods to ensure psychologists are provided with an accessible, interactive and stimulating opportunity to prepare for the face-to-face workshop. The APS suggests that a full day of face-to-face training is enough to ensure psychologists are able to consolidate and reflect on their learning and prepare them for the self-assessment task and the provision of supervision.

Self-assessment/appraisal is an important skill for psychologists and supervisors and would be further developed by utilising the suggested self-assessment model of competency. Self-assessment of a videotaped supervision session (audio is regarded as of lesser quality but would be acceptable under special circumstances) will support psychologists to reflect on their strengths and weaknesses and assess themselves against a standardised checklist that will be provided to them.

The APS suggests this checklist must be submitted to the training provider as evidence of the completion of the self-assessment process. The training provider will have the opportunity to conduct either a random or competency-based audit of the taped session if deemed necessary to establish competency and/or provide additional feedback to the participant.

### *Revision Supervisor Training*

The APS proposes that all graduates from the Foundation Supervisor Training (and within the following 5 years), together with those psychologists who have established evidence of appropriate prior learning and experience, be required to complete the Revision Supervisor Training comprising the following Components A, B and C:

- A) 4 hours of preparatory work with utilisation of eLearning facilities (e.g., reading, reflective practice, online interactive training)
- B) 4 hours of face-to-face or online face-to-face (e.g., skype, webinar sessions) skills consolidation workshop
- C) Assessment of competency
  - A 30-60 minute recorded real or role-played face-to-face supervision session;
  - A self-assessment checklist (an advanced form of to the Foundation Supervisor Training instrument).

The APS argues that for psychologists who have already completed the Foundation Supervisor Training; established substantial prior learning and experience; or live in regional, rural and remote (RRR) areas; the PsyBA must utilise more flexible and innovative methods of training delivery (e.g., skype, webinar) to ensure psychologists can easily attend training and not be deterred from completing training due to excessive requirements or limited time/attendance opportunities.

## 3.2 Delivery

### *Regional, Rural and Remote Training (RRR)*

The APS supports the PsyBA's intention to look favourably upon training providers who demonstrate commitment to provide supervision training in RRR areas as nearly 20% of APS members (Associate Member and above status) live in RRR areas (see ARIA+ below). The APS asks the PsyBA to consider and make explicit how it will monitor this commitment once a provider has successfully won the tender to provide training.

As many of the trainers will be commercial entities, despite good intentions of delivering RRR training, if participant registrations are too low in RRR areas, it is possible that providers may cancel RRR training for "lack of interest" reasons. The APS suggests that the PsyBA request that prior to approval, providers must identify where and how many RRR training opportunities they will offer and commit to delivering a minimum number of training opportunities in RRR locations. Alternatively, the PsyBA might consider subsidising rural training to ensure metropolitan participants do not incur the additional cost.

The APS utilises the Accessibility/Remoteness Index of Australia Plus (ARIA+) which is a geographical classification system of remoteness utilised by the Australian Bureau of Statistics (ABS; see [http://gisca.adelaide.edu.au/projects/category/about\\_aria.html](http://gisca.adelaide.edu.au/projects/category/about_aria.html) for a brief overview). ARIA+ determines categories of locations throughout Australia. The APS suggests the PsyBA consider this categorisation to support the delivery of training in RRR areas and suggests subsidised training be delivered at a minimum ARIA+ score of .21 and above, which is considered Inner Regional by the ABS. This classification would include locations such as Wollongong in NSW, Ballarat in Victoria and Townsville in Queensland.

### *A Competitive Market*

To avoid a commercial monopoly and to keep costs to psychologists to a minimum the PsyBA must approve multiple providers to ensure access to training is financially accessible for all. The APS's proposed structure and delivery of the training aims to keep costs to a minimum by reducing the amount of face-to-face training required, increase the consideration of more innovative and online teaching methods and utilise a self-assessment approach with the option of audit to check competency.

### *Participants From Cognate Professions*

As stated by the Australian Psychology Accreditation Council (APAC) and APS College guidelines, cognate professionals often provide secondary supervision to psychology students of professional programs within industry or external placements (e.g., health promotion placements, drug and alcohol placements). Offering these supervisor training opportunities to cognate professions will benefit the psychology profession by up-skilling a workforce that currently may contribute to secondary supervision of psychology students; increasing opportunities for training providers to offer RRR training opportunities due an increase in potential participants; and similarly reduce costs of training if more participants are able to attend.

## **Section 4: Board Approved Supervisor Competencies**

### *Content*

The APS supports the PsyBA's objectives of ensuring psychologists providing supervision are equipped and proficient in areas of professional practice and competent in the delivery of supervision. However, the current suggested "competencies" are not sufficient to ensure an appropriate applied-training methodology and appear to be based on limited research as a basis for proposing that this standardised training will significantly improve the competence of supervisors and supervisees. The competencies must strongly reflect the *process* of supervision and the skills required to deliver supervision rather than areas of competency required to register as a psychologist. By focusing on the process of supervision, training will remain relevant and applicable across all general and endorsed areas of psychology practice.

For example, skills generalisable across all supervisory relationships would include 1. building a supervisory alliance, 2. goal setting, 3. competency development, 4. assessment and evaluation of client outcomes, and 5. problem solving. The PsyBA must ensure that the process of supervision is the focus of training to avoid the need for specialist or endorsed streams of training. If psychologists require additional support in applying their supervisory skills to endorsed area of psychology, the PsyBA could consider utilising the APS publication "Supervised Practice (College) Guidelines" (Attachment 1).

The APS suggest that at a minimum, Competency 1: "Knowledge and understanding of the profession", be removed. This competency is equivalent to retesting a psychologist to prove they are eligible to register as a psychologist. Psychologists have clearly demonstrated their knowledge of the profession upon their successful completion of university training, assessment and awarding of their degrees or by the successful completion of the internship pathway.

Similarly, Competency 7: "Ability to address the legal and ethical considerations related to the professional practice of psychology" has been established by psychologists in their successful completion of training and registration as a psychologist. This is a very important competency and deserves consideration but to include it as an entire competency area is excessive. The APS suggests that the ethical and legal considerations of working as a psychologist and supervisor could be incorporated into Competency 4, for example:

- "Ability to assess the psychological competencies and ethical and legal practice of the supervisee".

In addition, Competency 6 is excessive and disregards that as registered psychologists; each psychologist is trained in, and works within, professional practice that includes 1) Respect for the rights and dignity of people and peoples, 2) Propriety and 3) Integrity. Psychologists training in supervision should not be required to demonstrate their awareness of diversity of working with a range of clients within a range of services as this is already required for registration.

While the APS acknowledges that Competencies 2 to 5 attempt to focus on the process of supervision, they require a significant review of nomenclature as the concepts are not easily measurable and as such do not succinctly reflect the applied skills the training should endeavour to teach participants. The language must lend itself to being systematically evaluated to align with competency-based practice and self-evaluation rather than intellectualising the content. The content areas must be

written in an applied and measurable manner to support psychologists to evaluate their own skills in the real world of practice.

While trying to keep the competencies relevant and succinct, the APS argues that the PsyBA has failed to acknowledge a significant area of supervision which is to support students and psychologists to navigate complex working environments, professional relationships, workplace issues and career development. The APS suggest the following additional areas of competence be considered:

- “Ability to assess and facilitate improvements to professional and workplace practices”:
  - Assess and evaluate professional and workplace situations to meet the needs of supervisee;
  - Facilitate the appropriate management of the professional and workplace relationships involving the supervisee.

### *Workforce Ramifications*

If supervision training is onerous and expensive, the PsyBA will further alienate the workforce and similarly reduce the already limited number of experienced supervisors available. Without considerable revision of the proposed training this would have a hugely negative impact on the profession and community wellbeing. The APS supports the provision of evidence-based supervisor training. However, the content, the medium in which it is delivered, or assessment and cost must not be deterrents to provide supervision. Training must essentially focus on being applied, relevant and financially accessible to all psychologists, irrespective of the amount of supervision they provide or the income they may, or may not, generate from providing supervision.

### **Section 5: General requirements of supervisors**

The APS supports the notion that only supervisors who provide supervision in the following ways are required to complete mandatory supervisor training:

- As part of an internship program
- As part of higher degree program
- As part of a registrar program for purposes of endorsement

The PsyBA should consider changing the terminology used regarding “as part of a higher degree program” to “professional program” or “as part of an APAC accredited higher degree program” as without this clarification, as it stands, the terminology suggests that supervisors supervising PhD students will require supervisory training.

In saying this, to mandate supervisor training for those who provide supervision within accredited professional programs further erodes the autonomy of the higher education providers and suggests their existing management and oversight of supervision on placements is currently not sufficient. If problems arise within the supervisory relationships within professional programs, there should be an APAC review process that should remedy this issue and not a mandated process of training issued by the registration body.

Furthermore, supervisors employed as part of an APAC accredited higher degree training programs should not be financially responsible for mandated training as if this were to be financially supported by their university, the university’s interest in providing such programs, already badly eroded by prolonged underfunding, would predictably wane further, with additional loss of such programs, ultimately negatively

impacting the profession and community. The already limited number of supervisors available within these programs would be drastically reduced.

In addition, many professional program placements are supervised by staff members of the placement institution, not the university program. For example, a student of a Clinical Masters program may be supervised by the Clinical Psychologist employed by the public hospital in which the placement occurs, without funding provided to the hospital. Essentially, the psychologist provides free supervision to the student within their existing working responsibilities at the institution's own discretion. As such, supervision is conducted and funded by the institution and underpinned by a value system that intends to support the profession. The PsyBA appears to lack an appreciation of these arrangements and as such, the mandation of expensive training of the institution supervisors (born by the supervisor or institution) will result in many institutions withdrawing their agreement with universities, drastically reducing the number of placements and supervisors available to the profession.

The APS also agrees that psychologists providing face-to-face supervision for professional but non-registration purposes not be required to engage in formal supervisor training. The APS argues, however, that standardised supervision training strengthens the quality and delivery of psychological services and ultimately benefits the profession and community. The PsyBA should consider encouraging psychologists providing supervision in workplaces or for professional development purposes to engage in supervisor training as part of their own continued professional development (CPD) requirements.

### **Section 8: Maintaining approved supervisor status**

The APS seeks some clarification regarding the process of renewal of supervisor status. As mentioned under section 3.1 above, can the PsyBA confirm that the "revision training" is a one-off prerequisite and not required to be repeated every 5 years for renewal purposes? If the PsyBA is suggesting that the supervisor training and/or revision needs to be conducted every 5 years, the APS strongly argues that this is not required as it is "re-teaching" skills. This would be similar to asking psychologists to re-learn and be re-assessed on core components of their university training.

The APS suggests that the PsyBA provide a rationale for requesting that psychologists must report the number of psychologists they have supervised in order to renew their supervisor status. This information may be useful in terms of workforce data. However, "number of psychologists" seems to be an arbitrary and meaningless measure. For example, one supervisor may provide 40 hours of supervision to *one* student as compared to another psychologist who provided *four* students with 10 hours of supervision to each. The APS would argue that supervisors should not be required to provide this information as part of their renewal and simply be required to state that they have or have not engaged in providing supervision.

In addition, the PsyBA suggests that supervisors must establish how their supervised practice and professional development have been maintained throughout the previous 5 year period. The APS wishes to clarify whether the PsyBA is suggesting that supervisors must present evidence of their CPD hours every five years. Supervisors should not be required to present this information unless undergoing an audit (as per general CPD requirements). If the PsyBA requires documentation of this type, the PsyBA could request supervisors provide a short paragraph describing the areas in which they have engaged in professional development and active supervised practice

and remind psychologists that they may be required to present proof of this information if audited as part of registration purposes.

### **Section 10: Approval of national training providers**

As previously stated (Section 4), it seems there is limited evidence to suggest that standardised supervisor training will improve the competence of supervisors and supervisees. Yet the APS appreciates that this training will be useful if it is evidence-based and conducted appropriately. As such, the PsyBA must ensure that providers are not only able to illustrate the evidence-base of the content areas of supervisor training but also the teaching techniques and mode of training.

The PsyBA does not comment on the possibility that supervisors may seek the Foundation Supervisor Training with one provider but seek the Revision Training from a different provider (e.g., for reasons of availability, location, satisfaction). The APS suggests that the different Provider option is preferred but not necessary. The APS supports the idea that psychologists should be free to choose between providers and not be required to complete both training events from the same provider.

In approving training providers, the APS suggests that there are a number of issues and intentions that should be raised with providers even though they may not be all predictable in advance:

- How many Foundation and Revision Supervisor trainings they will offer;
- Where they will offer both trainings;
- By which date they will offer the Revision Training;
- How often they will provide training; and a
- A minimum commitment of some provision of RRR training (or PsyBA subsidised RRR opportunities).

The above requirements ensure that the PsyBA, and psychologists, can be fully informed regarding the availability of training for psychologists and how often they will have the opportunity to attend and revise their training (particularly within the five-year mandatory period of revision).

### **11. Transition Period**

The APS argues that the transition period needs to be extended to ensure that psychologists have ample time to attend either the Foundation or Revision Training. The limited amount of time to transition to the new requirements proposed by the PsyBA is yet another deterrent for experienced psychologists to engage in mandatory training. Furthermore, it seems impossible to pre-determine a date of transition as the training has yet to be developed. Without confirmed providers stating the date they will begin to operate, the PsyBA cannot estimate the transition period psychologists will have to meet the requirements.

At a minimum, the APS suggests that those attending the Foundation Training must be given until the 30<sup>th</sup> of June 2014 to complete the first component of their training (if providers confirm delivery of training within a reasonable time frame) and those attending only the Revision Training should be given until the 30<sup>th</sup> of June 2015 to have completed that training. If delays occur in developing and delivering training, the PsyBA must be flexible to ensure psychologists have ample time to meet the imposed requirements.

## **12. Evaluation and review**

The PsyBA has stated that providers must submit “outcome data”. The APS asks that the PsyBA provide examples of the type of data they believe would be relevant. The following outcome data could be considered:

- Location of training
- Number of participants
- Participants registration number
- Location of participants main place of work
- Participant’s age, gender, endorsements, qualifications
- Subjective evaluation of training by attendees
- Scores of any objective assessments made during or at the conclusion of the training

These options are, however, only suggested for information gathering regarding delivery and training purposes and are not outcome data that assess the changes in supervisory or supervisee practices which are more important considerations (as addressed by the self-evaluation assessment). For purposes of program design, evaluation and review, the training desired should encompass evaluation with considerations of reliability, validity and level of performance of any assessment devices prior to the development of content and delivery to ensure such evaluation is not simply a *post hoc* information gathering exercise.

### **Attachments**

1. Supervised Practice College Guidelines
2. Letter/Submission from the APS College of Clinical Neuropsychologists

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