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Attention: Chair, Supervisor Consultation
Psychology Board of Australia

Dear Chair,

Re: Consultation Paper 12 - Exposure Draft - Guideline for Supervisors and Supervisor Training Providers

Thank you for this opportunity to consult on the draft Guidelines for Supervisors and Supervisor Training Providers issued on 3rd November, 2011.

The University of Sydney fully supports the Psychology Board of Australia's introduction of supervision training for all training supervisors in psychology. The University of Sydney has, as an organisation, part of a consortium of universities, and a joint partner with the University of New South Wales, provided supervision training for all supervisors involved in the training of students enrolled in the Doctor of Clinical Psychology program. This training has been offered on a voluntary basis (non remunerative) since the commencement of the program eleven years ago.

Currently the University of Sydney collaborates with the University of New South Wales to offer supervision workshops on an annual basis and would like to continue to do so. This training is based on the implementation of the developmental model of supervision and can readily be adapted to meet most of the requirements of the Psychology Board. Where the training needs to be extended, the Psychology Board has provided excellent structure and guidelines.

We wish to continue to provide supervision training to all supervisors involved in training our students at no cost to the supervisor. The University has around 75 supervisors who will not be eligible to supervise students without supervision training after June 2013, thereby placing our training program at significant disadvantage under such circumstances.

Supervisors give of their time voluntarily and are not funded to participate in training of this nature, so it is essential the university continue to provide this training to ensure student placements meet degree requirements. However, there are requirements set out in the consultation paper that make this impossible to implement. Furthermore, there is a guideline incorporated into the consultation paper that does not meet an adequate standard. Firstly, it is not possible for the University to meet the requirement of assessing all supervision trainees' submissions of a recorded supervision session and provide critical evaluation of these. The University is not able to provide staff to undertake such a demanding and time consuming task. University training programs at post-graduate level operate at a loss and universities are currently reductions in staffing levels.



Furthermore, the University does not have adequate storage space available to store what would amount to a large number of video recordings for the requisite five year period unless stored digitally utilizing appropriate electronic equipment.

We agree that supervision of professional supervision has an important role in developing and maintaining skills. The University provides this through regular presentations of supervised cases by students to all staff and students that provide feedback on treatment and management of patients directed by supervisors. Many of our staff also provide direct supervision of their peers' supervision sessions. Staff also attend mid-placement reviews with supervisors in the field supervising students on placements in the Doctor of Clinical Psychology program, thus offering training and oversight of the evaluation process.

Although the University is prepared to offer training to supervisors and can meet all other requirements; the requirement to critically review supervision tapes cannot be easily accommodated under the current situation, and makes it potentially impossible for us to fulfil the Psychology Board's requirements if this requirement remains.

We suggest that direct supervision of all supervisors be part of the general supervision requirements for registration of all supervisors and be included in the guidelines for Continuing Professional Development (CPD) by the Psychology Board. A requirement of one hour/year of direct supervision by a peer supervisor through direct observation or review of recorded material would be more appropriate to maintain and develop skills and more manageable.

Secondly, the guidelines require the supervisor to, "View active client files of the supervisee **intermittently** [emphasis added] as part of the supervision process" is considered to be less than adequate. An essential element of the supervisee's training is appropriate file-keeping and writing of notes to meet legal requirements. The safeguard of having supervisors sign off on all reports and notes entered into a file provides protection for the public, the student and the supervisor.

The Australian Psychology Accreditation Council (APAC) recognises the importance of this requirement in requiring that, "All reports and case notes written by the student and arising from training undertaken as part of any placement must bear the signature of the responsible supervisor" (p.55, 59, APAC Rules for Accreditation and Accreditation Standards for Psychology Courses, June 2010). Furthermore, the Ministry of Health in NSW also requires a supervisor sign off on all reports, letters and case notes of trainees. Letters written by students also need to be included in this requirement by the Psychology Board. To downgrade these regulations in the Psychology Board's requirements would lead to confusion amongst supervisors and leave the risk of courses being unaccredited as supervisors do not comply with accreditation standards.

The University is pleased to see the continuation of the work of the Psychology Board is raising standards for the profession to protect the public and thank three members of the Board for consulting on these matters to ensure compliance is possible and that no unforeseen barriers exist to their aspirations.

Sincerely,

Alex Blaszczyński