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COP's Response to PsyBA's CP 12:

Exposure Draft: Guideline for Supervisors and Supervisor Training Providers

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This is a public document on behalf of the APS College of Organisational Psychologists, prepared by the College's National Regulatory Developments Working Party (NRD WP)

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PREAMBLE

The Psychology Board of Australia (PsyBA) Consultation Paper 12 seeks final stakeholder feedback on 'Guidelines for Supervisors and Supervisor Training'. The proposed changes will affect all supervisors (including psychologists providing supervision for field placements in professional higher degrees). They are thus of major significance to the profession.

We acknowledge PsyBA's efforts in trying to enhance the professionalism of the supervisory process, and appreciate the extended time for transition. (The proposed national system will not become operational until 30 June 2013). However we are disappointed to find that previous commentaries on the issue of supervision, from this College and other parts of the profession, have apparently had little impact on PsyBA's views and proposals. The consultation process has greatest value where efforts are made to revise viewpoints and proposals in light of the input received, or at least to explain the reasons for persisting with poorly-received proposals.

RECOMMENDATIONS

1. The College supports the notion of initial training and supervision for psychologists new to that supervision role but requests that PsyBA withdraws the requirement for mandatory training for all supervisors.
2. Supervisory training is not necessary for supervisors providing supervision for higher degree placements, and we request that PsyBA withdraws this request.
3. The legal implications (of supervision matters) for employers, supervisors and supervisees needs much greater explication by PsyBA.
4. PsyBA is urged to lobby for collaborative workforce planning surveys to be conducted by a body independent of Health Workforce Australia before finalising these initiatives on supervision (CP 12) and the associated proposed national examination (CP 13).
5. PsyBA is encouraged to develop innovative, incentives orientated approaches in order to encourage psychologists to engage in supervision activities.

SUMMARY

The College notes that CP12 highlights the three different types of supervision, namely: (a) for "interns" completing the 4+2 or 5+1 pathway, (b) for University professional higher degree field placements, and (c) for "registrars" seeking practice area endorsement. While PsyBA does mention differences in supervision requirements in the section on learning plans for registrars, we would like to see greater tailoring and flexibility introduced into the supervision training philosophy, programs and delivery.

The College supports training of supervisors outside the University higher degree placement context, *when full registrants first enter into supervision of other psychologists*. However, such training should be: "light touch" and developmental in nature; free or at least inexpensive;

tailored to the supervisor's area of specialisation; possible to conduct on-line and/or through audio-conference; and if mandatory, with provision for exemptions where the potential supervisor with substantial experience in supervision-like activities (such as overseeing the work of other psychologists in a psychology work group) can establish her/his supervision credentials immediately.

The College does not support the notion of mandatory training of supervisors of students on field placements in professional higher degree programs.

The cost, content and duration of supervisor training are significant concerns for organisational psychologists surveyed by a concerned member of COP and reported to COP's National Regulatory Developments Working Party. The clear impact of PsyBA Guidelines, even in draft form, seems to have been to add to current levels of disengagement from and disenchantment with government regulation of psychology (especially through PsyBA).

Such negative – and in our view unnecessary - outcomes should give COAG, the Ministerial Council and PsyBA pause for thought and reconsideration in regard to governmental efforts to provide adequate risk-focused protection of the public and to grow the psychological workforce across the diverse private and public sector areas in which psychologists are employed. Rather, they are currently focused on clinical services in the health sector with inappropriate assumptions being made (usually implicitly) about the generality of the kinds and degrees of risk involved across the whole profession, and about the future workforce needs of the various sectors in which psychological services are delivered.

With specific regard to supervision, field placement supervisors and a number of other respondents to the reported survey believe that supervisory training is not necessary for supervisors already providing supervision for higher degrees, and that making it mandatory would have deleterious effects on the pool of available supervisors – and thus also shrink the number of available placements. Selection and management of field placement supervisors should remain an academic duty and responsibility, consistent with the academic unit's charter for the delivery of the university's APAC¹-accredited programs. Different academic units tailor their approaches to their particular circumstances. These differences should be respected and left undisturbed by PsyBA (except through proper APAC processes).

We also urge review of the regulatory legislation to indemnify supervisors against the actions of the other two types of supervisees ("interns" and "registrars"), where the supervisor- supervisee relationship is not a formal employment relationship. Addressing this issue of indemnity would predictably remove one of barriers to more psychologists agreeing to act as supervisors.

We also urge COAG, the Ministerial Council and PsyBA to provide funding and other support for workforce planning surveys to be conducted *across the whole profession* before finalising PsyBA-proposed initiatives on supervision and the associated proposed national examination. We are aware that there will be reviews of health sector workforces presumably commencing in 2012 by Health Workforce Australia (HWA). However the majority of generalist psychologists, organisational psychologists, educational psychologists, sports psychologists, forensic psychologists etc. have not worked and are not providing systematic, regular services in public health. Data need to be formally collected on the roles of supervising psychologists and associated desired supervision competencies in the various non-health arenas. This is an ongoing concern that COP has raised previously.

¹ Australian Psychology Accreditation Council

We also urge a shift from compliance oriented thinking by PsyBA to a more positive, incentive-oriented approach for psychologists to participate in supervision. Given the existing and potentially even greater shortfall of supervisors the focus needs to be on how potential supervisors can be recognised, rewarded and otherwise encouraged rather than alienated and disengaged. We believe that a more comprehensive and differentiated risk management philosophy will better serve the needs of the profession, and the public at large, rather than a compliance approach which runs the risk of producing, or reinforcing, a “one size fits all” mentality.

Reforms around supervision should provide incentives and supports for experienced practitioners to become supervisors, not burden them with more regulation, training and compliance. Supervision requirements should not be used to try to create quasi-clinical psychologists; rather *they must cater for the diverse supervision needs of the whole profession.*

The survey data presented to the College’s National Regulatory Developments Working Party suggests that the mandating of training for supervisors (particularly for those providing field placement supervision) will dramatically erode the support of the profession given the cost and potentially onerous requirements. This is perhaps not surprising given the increased demands, including compliance requirements, now imposed by psychologists in Australia. There is a sense, as expressed by experienced organisational psychologists, that potential supervisors are saying “we have had enough”, and they are seeing this supervision training consultation paper as an opportunity to voice their displeasure. As laudable as the objectives of supervision training may be, the negative survey responses to elements of this consultation paper (CP12) need to be considered in the light of the events that have transpired since 1 July 2010.

We urge the Board to consider greater flexibility in content and delivery, allow opportunities for cost and time reduction in the training processes (including offsetting such training against CPD requirements) and ensure that educational providers still have the opportunity, and responsibility, for choosing and monitoring supervisors as part of a professional higher degree program.

Furthermore, it can be argued that supervisors who have completed practice-relevant supervision training may be more attractive to some supervisees within the marketplace, and be able to justify higher fee levels. Flexibility and options in the training programs are the keys to attracting such potential supervisors, rather than a fixed, mandated approach which draws limited support from competent psychologists. The PsyBA should not overlook the benefits of drawing at times on market forces in order to raise the standards of psychology in Australia, thus providing greater protection to the public. But other options should be contemplated, such as and especially the provision of supervision training programs by the APS and its Colleges, with subsidies from government, at least for the establishment phase of such programs.

MAIN SUBMISSION

The implications of the changes inherent in PsyBA Guidelines Supervision and Supervisor Training are that:

- Previously supervisors providing supervision of field placements for professional higher degrees have not had to participate in training in supervision. Now apparently they will have to do so.
- There is now formal stipulation of seven generic competencies relating to supervision, with associated recommendations (requirements?) for each competency. These competencies are by no means settled within the profession, and are certainly not generic across the various specialisms. Yet PsyBA proposes to apply them across the three different types of supervision, in all areas of psychology.
- A substantially increased amount of time is required of supervisors for participation in the proposed competency based program. This increase is problematic.

Our submission will address three key areas in responding to Consultation Paper Twelve with its many changes as outlined immediately above:

- The scope of application for this legislation. This specifically refers to the requirement for all supervisors to undertake training in supervision from 30 June 2013, with the possibility of limited exemptions.
- The content and duration of the proposed supervisory competency training.
- The need for models of competency training for endorsement which are specific to the area of endorsement.

INFORMATION SOURCES: SURVEY AND PHONE INTERVIEWS

Our responses to these three key areas are based on two main sources of data. The first is a survey which was conducted by a concerned member of the College. It was sent electronically to all college members who were involved in providing supervision, shortly before Christmas and which closed on New Years Eve. Despite this narrow time frame, she received 71 responses (two from recent graduates who were not supervisors), which represents approximately 73% of registered supervisors for the College of Organisational Psychologists. A copy of the survey questions is included in Appendix A.

The second source of data was brief phone interviews with field placement coordinators for the Masters of Organisational Psychology programs around Australia. Unfortunately the timing of this consultation paper coincided with most field supervisors being on leave, and feedback was obtained from only four universities (two in NSW and one in Queensland, one in South Australia).

She was also curious to see how these proposals would affect some of the other APS Colleges. Her brief discussions with colleagues in the Colleges of Clinical Psychologists, Educational Psychologists, Sports and Exercise Psychologists, Forensic Psychologists, Neuropsychologists and Counselling Psychologists suggested that organisational psychologists are not the only endorsed psychologists who will be very adversely affected by the proposals in Consultation Paper Twelve. We anticipate that these Colleges will be lodging their own submissions.

A list of all the universities which were contacted and invited to participate is included as Appendix B.

Key Area One: Legislative scope

Should supervisor training be mandatory for all supervisors, or limited to those engaging in supervision for the first time?

Clearly the survey respondents supported the latter (initial training only).

Many members strongly supported the idea of initial training in supervision, to ensure competency and formalised development, provided that training was free. *But there was no evidence of support for repeated supervisor training, other than in the context of Continuing Professional Development activities (of which some further training in supervision could be a voluntary part).*

Survey responses included:

“Having completed the STAP training, I’m really pleased with the proposal. It was a great process to “weed” out people who really shouldn’t be supervising.”

“I think this is a good thing to ensure we are all aligned [...].”

“As organisational psychologists we market that our extensive training gives us a skill and evidence base that sets us apart from ‘management consultants’ and ‘life coaches’. Why then, would we believe that ‘just because’ you are an organisational psychologist that necessarily means you have the skills and competencies to be a good supervisor?”

Why wouldn't we encourage supervisor training, unless, like life coaches, we believe that wanting to be one is enough to make you good at it?"

"I think it is necessary to ensure adequate supervision in the field."

"I agree that supervisor training & accreditation is important, particularly for new supervisors and to ensure currency with new guidelines. However, having participated myself, in recent years, in several courses for supervisors run by the APS, the Qld Registration Board (for accreditation) and others and also worked actively in many supervisory roles (including for higher degrees) over some 20 years, I believe there should be a process for recognising appropriately credentialed supervisors and waiving some or all training requirements. There should also be consideration given to the fact that many experienced supervisors are phasing out towards retirement by working part time or voluntarily and the costs of supervision, if borne by these individuals should be minimised."

"Idea OK. Cost bad as I don't charge for supervision."

"I have completed 2 supervision training programs, and found these quite beneficial. However as an Organisational Psychologist I would prefer that the training is more tailored to meet the context of working with organisations."

Field placement supervisors, supervisors of interns (in the 4+2 pathway), and supervisors of registrars are already committing a substantial act of generosity with their time by agreeing to provide supervision. University field placement supervisors are not paid. Few individuals charge the full APS rate for supervision of interns and a number provide supervision for free. It is too early to know the emerging trends in registrar supervision. In other words supervision is (typically or at least often) provided as an act of selfless contribution to building the next generation of organisational psychologists. It is therefore important to demonstrate that there is strong evidence of efficacy of training.

In the survey one field placement coordinator expressed concerns that *"this was a purely procedural measure with no evidence that it will be effective or is required. It is hard already finding good supervisors, and this will make it impossible for students to finish degrees and obtain endorsement."* Another survey respondent commented *"I agree that supervisors need to be competent. However, if they are already competent, why must they attend training? If they are not competent, why do we think attending a training session will make them competent?"*

Regarding the issue of mandatory training for all supervisors, survey respondents commented on the overlap between areas of organisational psychology expertise and supervision, as well as the adequacy of existing arrangements:

There needs to be a degree of common sense [...]. We are talking about a highly educated workforce who has demonstrated capability in providing sensitive services to some of our most vulnerable populations. Is it really fair to say we cannot trust these individuals to be capable in sharing professional knowledge and insight? We risk making the barriers to entry in this profession so high that people will simply choose an alternative title in order to avoid this.

Another respondent took an even less accommodating stand:

“Training was unnecessary for COP members, this is their field of expertise [...]”

Time demands and content focus of supervisor training:

Even for initial training, concerns emerged around the proposed supervision requirements being too time consuming. Supervision already requires substantial administration. Adding a two day workshop and seven hours of preparatory reading is unlikely to appeal to time-poor professionals. Whilst 56% of respondents indicated that it would have no effect on their willingness to participate (provided that training was relevant), 44% of respondents indicated that this training would reduce their willingness to undertake supervision or cause them to stop providing supervision altogether. *It thus appears that PsyBA proposals for mandatory training even of experienced supervisors will have a very deleterious effect on the pool of available supervisors. This reinforces the view that PsyBA should concentrate on entry training for new supervisors.*

The importance of training being evidence-based.

Another respondent noted:

“I have completed supervision training for higher degrees at a leading Qld university. I have studied supervision training protocols used in Australia today and have investigated the research into the (in)effectiveness of supervision training to produce demonstrable outcomes/improvements in service delivery. In my opinion the Psychology Board should limit the introduction of regulations governing all aspects of psychological practice to only those areas where sufficient scientific support and clinical evidence exist to support the rationale for introducing regulations [...] The Board should fund the accumulation of evidence where required in arms length funding not by reports written by profession (AEC – professionals?) with vested interest. [...] I strongly believe the “must be evidenced based” requirement that I am advocating will need to be mandated by legislation to counter the “means well” and “common sense” justifications that underpins the decisions of most regulatory bodies.”

We strongly agree with the need for an evidence based approach to ensure relevant and appropriate policy around supervisory training. This evidence should include an independent skills audit of the current psychological workforce, as well as incentives to participate in supervision. (More of this aspect later in this Submission.)

What are the main deterrents to being a supervisor?

Perceived lack of evidence-based necessity, time demands, and financial costs all figured in survey responses:

“I think the regulations that are already in place around registration and continuing development are more than sufficient to provide adequate support for supervisors. If the mandatory training is free then this would be a good initiative, however the excessive registration fees do not permit additional spending on such training and would limit the opportunities for students and provisional psychologists. Moreover the fee structure for provisional psychologists to move into full registration at \$800 is excessive and an insult after so many years of training and fees already paid [...]”

“The attendance of working psychologists at additional training sessions will be an added imposition that will impact upon the goodwill of busy practitioners who are already donating their time.”

“This is certainly a deterrent from providing any form of supervision in the future. I run a business and to undertake training is time and money for me.”

“I think in org psych at the moment it is difficult to find supervisors already and this will make it virtually impossible. It's good in theory but I don't think it will work in practice.”

“There are already an insufficient number of supervisors for specialist supervision - this additional pressure may further decrease this number. I provide a range of supervision - all voluntarily - having to jump through hoops may mean I decide not to do this.”

“I disagree and believe that this is a pointless training course to attend. I won't attend as I am too busy to attend more training in what I know already. I basically volunteer my time as a supervisor and I believe that many others do so also. By making training compulsory, it will deter supervisors to get training and our placement students, and hence our industry, will evidently suffer.”

Impacts of supervision training requirements for University placement supervisors

Discussions with university placement co-ordinators in organisational streams revealed a common theme of the difficulty in finding good supervisors who were prepared to contribute their time. There are some regional and specialist-field differences in availability of supervisors. One placement co-ordinator noted that in the area of organisational psychology in her geographic area there was substantial competition to be a field supervisor but only the most senior organisational psychologists were selected for supervisory roles. It was felt making these very experienced and eminent psychologists attend training would be an unwelcome imposition.

All field placement co-ordinators noted that universities already had mechanisms for weeding out poor supervisors: supervisors were interviewed, completed a vetting process and questionnaire, worked to a contract, and were evaluated by the student at several points in the placement. All field supervisors were firmly of the view that current mechanisms were adequate, and that selection and management of supervisors were and should remain an academic duty and responsibility.

Supply-side issues

This survey of organisational psychology supervisors indicated that over the next twelve months, 63% of supervisors planned to provide supervision, whilst 37% indicated that they would not be providing supervision. *The problem is not one of regulating supply, but is to create an adequate pool to meet demand.*

A COP Associate Member respondent to the survey commented:

“I have just completed my Masters in Organisational Psychology. A majority of my peers have decided not to engage in the supervision process so as to become a member of the college and obtain specialist endorsement. This is primarily a result of the excessive requirements required for supervision weighed against the benefits associated with specialisation, particularly within the organisational field. I fear that should the challenges

in engaging a supervisor become more difficult this large proportion of students failing to engage in supervision will drastically increase.”

We believe similar problems of supply are perceived to exist in other specialist areas of psychology such as forensic, educational, sports, neuropsychology and community psychology. In some specialisations even in densely populated areas, there is significant competition to obtain a field supervisor, much less a supervisor for endorsement. Indeed the personal experience of one member of COP's working party has been that she has been unable to find a neuropsychologist to supervise a clinical masters placement at any of Sydney's teaching hospitals. She has been repeatedly advised that there are not enough neuropsychologists to supervise graduates from the Masters of Neuropsychology at Macquarie University, let alone all clinical psychology masters students seeking neuropsychological placements.

Two field placement co-ordinators expressed a concern that the high cost of participating in this training will mean that supervisors across all streams will have to charge full rates to recuperate their costs. Worryingly 33% of survey respondents reported that their fees would increase, 35% of respondents indicated that they would have to start charging for supervision, whilst 15% indicated their fees would remain the same and 17% indicated that they would continue to provide free supervision.

In some rural settings and less populous states, available supervisors in organisational psychology are already stretched trying to meet demand. For example, in South Australia there are only 16 organisational psychologists who provide supervision. There is one registered supervisor for organisational psychology endorsement in Tasmania, one registered supervisor in Western Australia and no registered supervisors in the Northern Territory.

[Relevant authorities may well wonder why there are only three registered organisational psychology supervisors (registrar program) in Western Australia when there are at least twelve (12) participants from the University of Western Australia Business School who will presenting at SIOP 2012. This annual US - based conference is the largest and most widely acclaimed organisational psychology conference globally, with attendance of around 4,500 expected. This engagement by UWA psychologists contrasts with the very few contributions expected from elsewhere in Australia. These academically orientated psychologists have developed arguably the most successful "business psychology" group of any universities in Australia. A number of these contributors are well known internationally, yet there appears to be a disinclination to engage with the model of psychology that is being promulgated currently in Australia. Why is this so?]

Legal concerns – a missing link in PsyBA policy on supervision

A very important issue about supervision is the kind and level of involvement of the employer or placement agency. The PsyBA Consultation Paper (like its other papers) is silent on this issue. The employer or agency is treated as if it did not exist. Its legal responsibilities, expectations about the psychological work being undertaken as part of supervision, and the kind and degree of its oversight of that work, are nowhere considered. Neither are the role relationships between supervisor/supervisee and the employer/agency staff associated with the supervised work and the latter's legal status and powers to direct or intervene in regard to that work. In our view PsyBA and the Ministerial Council cannot continue to ignore this aspect of supervision and broader regulation of the professions.

Key Area Two: Training Duration

With respect to the duration of training, the Consultation Paper (p. 8) provides these outlines:

The Board is proposing that the initial training and systematic assessment consist of:

- *approximately seven hours of preparatory work (e.g. reading relevant material, reflection on practice) and passing of self-study modules related to knowledge of relevant Board guidelines and general supervisor readings. This component may be assessed by a multiple-choice test online (or similar) prior to the face to face instruction*
- *a minimum of 14 hours of direct face to face instruction (e.g. workshop participation) and*
- *systematic assessments after a period of time has elapsed following the direct instruction focused on competency attainment (e.g. supervision of supervision including direct observation and critical feedback, submission of a videotape of a supervision session, a short test).*

The direct face-to-face instruction (e.g. workshop) should focus on the development of supervision skills, appropriate to all pathways, and focused on active practical skills training grounding the competencies (e.g. using active exercises with feedback). The face to face workshops should not be a primary vehicle for knowledge acquisition, which should occur in the preparatory phase.

Specific training modules related to the various pathways may be developed and offered. For example, a program designed for interns will focus on reviewing supervision plans, and may use various learning methods (e.g. workshop exercises) to ensure learning in this area. A program focused on the registrar training may focus on specific areas related to the scope of practice e.g. relevant assessments. Supervision training could importantly also focus on increasing knowledge and skills in the writing, development, and evaluation of case studies, relevant to the various pathways.

Again we appreciate that PsyBA has recognised the diversity of the psychological profession, and the need for flexibility around delivery options. However in terms of the content of the program, we are concerned that it will be designed to support the proposed clinically-focused national examination that has been put forward by PsyBA (hence the long program duration).

We have to ask the question of whose definition of core competencies is being applied here? We are aware of a spurious view expressed by a small minority of our profession, that all psychologists should be primarily clinically orientated. We would hasten to add this is of very limited value in organisational contexts where the focus is on strategy, systems design, human factors in technology, employee selection, leadership development and so forth. Clinical skills are rarely required, if ever, and when we have need of a clinical colleague, we can 'refer on'. A focus on clinical matters comes at a professional cost to psychologists who do not work within the clinical domain. One respondent commented:

"Coincidental to national standards on many things Psych matters, I personally agree with a systematic, structured and evidence-based approach to providing supervision, whether to generalist or specialist practitioners. I am accepting of having to undertake "training" regarding this to ensure consistent standards and approaches for trainees. I would be concerned however, that this training be mandated through any one centralised provider. Additionally, this training if mandatory, must deliver effective learning and development outcomes to supervisors of all psychological fields, including

applied disciplines such as organisational psychology. Criticisms to date of mandatory supervisory training within Australia include a focus to counselling/clinical psychology and lack of expertise in facilitation of "training", where audiences are not tailored to."

The problem with the proposed national examination is that its content is predominantly clinical. Proponents of this examination have argued that the content reflects essential competencies that should be held by all psychologists. The complexity of the national examination is such that it will be a challenge for even practising clinical psychologists, and the examination content does not in any way reflect the core competencies actually required of psychologists working in Mining, Defence, Sports, Not-for profit organisations, Finance and Insurance and other corporate consulting. Both this proposed national examination and the duration and cost of the proposed supervision training programs seem to be examples of a public health model being inappropriately imposed on other industries and subsequently cutting off the supply of skilled labour to those industries. The subsequent outcome does nothing for our national economy.

We also question the proposed duration of this program given that as the Consultation Paper notes there is no research addressing the best length for supervisory training. We have estimated that the opportunity costs to our members for participating in this program (only including the seven hours of preparatory reading and two day workshop at \$280 an hour as per APS rates) will equate to \$5880.00. The time and cost requirement for those in regular salaried employment might be achievable, but for the many of our members who are self employed this is a significant burden.

We would suggest that the workshop should go for half a day to one day only, and that either the participants be compensated at APS rates for their time, or the programs are provided free of charge and over a period of time that allows completion of the program on a part-time basis. The main rationale for the latter proposal is that unless the development and provision of supervisor training are government-funded, the infrastructure for the development of the Psychology workforce will effectively collapse, in both the health sector and beyond it.

As one respondent noted:

"Training should be free. Perhaps PsyBA should subsidise loss of income given that this training is more a good will gesture."

We would also suggest that supervisors be given access to a resources website where they can submit questions about ethics and legal aspects of supervision and there is an option of voluntarily engaging in self assessment quizzes. Further that training be conducted in a variety of modes. We appreciate that the development and maintenance of such a website is an expensive and lengthy process. For those registrants who are APS members, access is available to the Society's (electronic) Professional Practice Handbook, which provides a general resource that would meet some of PsyBA supervision requirements, but registrants who are not APS members have no such resource. And no registrant has access to a set of resources tailored to the three different types of supervision.

Survey respondents in rural and remote areas advised that it should not be assumed that online delivery would be adequate for supervisors working in rural and remote settings where internet connections can be unreliable if indeed they are available.

Key Area Three: The need for models of competency training for endorsement which are specific to the area of endorsement.

Consultation Paper 12 (p. 9 – 11) stipulates that supervisors be competent in:

1. *knowledge and understanding of the profession*
2. *knowledge of and skills in effective supervisory practices*
3. *knowledge of and ability to manage the supervisory alliance*
4. *ability to assess the psychological competencies of the supervisee*
5. *capacity to evaluate the supervisory process*
6. *awareness and attention to diversity*
7. *ability to address the ethical and legal considerations related to the professional practice of psychology.*

We appreciate that the Board has expressed most of seven core competencies in generalist language that could be applied to any stream of psychology. Fifty percent of respondents, it is reported, felt that this list provided reasonable indication of what was required in supervision. Remaining respondents either questioned whether these competencies were supported by research, or were actually competencies, and were concerned about how the detail would be expressed in training. One respondent argued that points 1 and 6 were already covered in the process of registration, and were therefore not necessary in supervisory training.

There was a mixed response in the survey to the form of possible exemptions from supervisory training. Respondents seemed to be equally split across four broad groups. One group supported inclusion of peer reviewed articles as the basis for exemption. A similar number of respondents questioned the relevance of peer reviewed publications and grandfathering clauses. As one respondent noted *"I've been singing all my life, but having 35 years experience doesn't change the fact that I'm utterly crap at it."* A remaining group of respondents expressed disappointment at the perceived lack of recognition of practical experience. The final group respondents argued that the nature of organisational psychology had already provided them with the competencies to be good supervisors and training was not necessary.

Point 1h (under core competency 1: knowledge of the profession) is a concern for our members, in the survey and we believe more generally. This point stipulates that supervisors *"must have a knowledge of practice across the lifespan, which involves demonstrating the core capabilities with clients in childhood, adolescence, adulthood and late adulthood relevant to the supervisee's supervision plan."*

Organisational psychologists deal with workplaces. Child labour is currently illegal in Australia and most people still retire at the age of 66, so we do not deal with children or the elderly who have left the workforce entirely. We might at the most work with adolescents from the age of 15 years and individuals working on a part time or casual basis after retirement. Our work does not require an in-depth knowledge of children's developmental stages beyond that conventionally taught in the first four years of psychology or the neurobiology of Alzheimer's for example. There might be a very tangential appreciation of developmental differences achieved through our implementing diversity management plans and work life balance plans for employees who are carers.

Point 1h is not relevant to our work, and it is a very remote to non-existent possibility that this type of knowledge would ever come up in a supervisee's plan. One placement co-ordinator's response in relation to point 1h was - *"this is like the requirement for us to teach intelligence*

and memory assessment in the organisational masters program – we duly do so because we have to, and then our students promptly forget all this stuff after graduation because they never have to implement this in practice.” Clients requesting counselling on the specifics of parental skills or career responsibility are referred on to clinical or developmental or educational or neuro psychologists or generalist psychologists working in this area.

We are pleased that the Board recognises the need for tailored programs. In our case these programs must reflect the context and practice of organisational psychology. The APS (2007) Code of Conduct quite clearly stipulates that psychologists must not practice outside their area of competence. This includes provision of training to supervisors in specialist streams – in other words there is a requirement for a supervisory stream which is specific to the specialist area of endorsement, and this workshop for supervision of organisational psychologists should only be conducted by endorsed organisational psychologists. However other kinds of input, from other kinds of professionals, may be appropriate from time to time, consistent with the multidisciplinary nature of much of organisational psychology practice, for example legal perspectives from lawyers on duty of care or industrial issues, or engineers, or HR practitioners, and so on. (More on this below.) We have the greatest respect for our clinical psychology colleagues, but we are certain that they would not be comfortable advising us on organisational psychology competencies relating to performance management, worker motivation, leadership strategies, organisational strategy, human factors, human resources management, job design and vocational assessments. As we have noted in previous submissions – effective supervision requires a match between competence and skills of the supervisor, context and trainee motivation.

This can be achieved with workshop content for our stream being developed by an organisational psychologist, and workshops being conducted principally by experienced and respected organisational psychologists. Notably, 56% of survey respondents indicated a clear preference for an organisational psychologist to run supervisory workshops relevant to our stream. Approximately 10% of respondents supported training being run by a range of psychologists from different specialisations, whilst a further 10% indicated that it did not matter who ran the training so long as they were an effective trainer. Remaining respondents indicated a preference for either academics or practitioners to lead the workshop, but they did not stipulate an area of specialisation. It is important to repeat here that organisational psychology is typically multidisciplinary and interdisciplinary, and that much meaningful CPD may be gained through presentations from other professionals (such as labour lawyers, engineers, economists, HR practitioners, etc.)

RECOMMENDATIONS (IN FULL)

The College (noting the views of surveyed supervisors and university placement coordinators) supports the notion of initial training in supervision for psychologists new to that supervision role but does not support mandatory training for all supervisors.

The cost, time demands, content focus and duration of training are significant concerns for survey respondents, and many qualified individuals have indicated that they will be blocked from participating as supervisors or will give up supervision altogether if PsyBA's proposed requirements are implemented as they stand in CP12. Recent organisational psychology graduates indicated that the supervisory component necessary for "practice area endorsement" was turning the majority of Masters graduates off working as psychologists in applied setting.

The clear impact of PsyBA proposals regarding supervision and supervisor training in adding to current levels of disengagement should give the governments (through COAG, the Ministerial Council and PsyBA) pause for reconsideration about the place of supervisor training in their efforts to provide for the protection of the public and grow the psychological workforce wholistically (not just in the health sector). Supervision policy cannot be treated as separate or divorced from these broader considerations. Indeed poor supervision policy has the potential to undermine those higher-level goals.

Field placement supervisors and a number of respondents believe that supervisory training is not necessary for supervisors providing supervision for higher degree placements. Given the deleterious effects on the pool of available supervisors (and thus on the number and range of placement opportunities), we urge that supervisors for higher degrees should be exempt from mandatory training in supervision. Field supervisors provide their services for free around student placements. We agree with the field placement co-ordinators that selection of field placement supervisors should remain an academic responsibility, and that there are adequate mechanisms in the universities for identifying and discontinuing the use of unsatisfactory supervisors.

As a separate (if similar) issue, there are already too few supervisors providing supervision *for practice area endorsement*, and PsyBA proposals are predicted to have a devastating effect on the pool of available supervisors for that purpose. It seems that many supervisors providing supervision for endorsement do so on a *pro-bono* basis. Whether they would continue to do so under the regime outlined in CP12 seems unlikely: they may well charge registrants for this supervision. If supervisors of this kind are to be nurtured, training requirements should be set only for those new to the supervision role, and at no or very low cost.

In regard to both forms of supervision beyond the Masters programs, we would like to see PsyBA lobbying the relevant governments for legislation which indemnifies supervisors against the actions of supervisees. Addressing this issue of indemnity would predictably remove one of barriers to more psychologists agreeing to act as supervisors.

PsyBA no doubt already appreciates the complexities here, regarding the intersection of statute and common law about "duty of care" and employer c.f. employee or (even more complex) contractor liability, the linkages with complaints processes, the jurisdictional variations in the latter, and other related matters. One of the many complexities is that the supervisor-supervisee relationship is not necessarily an employment relationship. It may therefore not be subject to the same laws or involve the same accountabilities as are imposed at State/Territory

level on employers to provide a safe workplace and effectively guarantee appropriate behaviour and competence from their employees.

The supervision relationship (where it is not part of a standard employment arrangement) is in essence a mentoring and developmental one, and supervisors should be protected from legal actions associated with inappropriate conduct of the supervisee that was not explicitly required or approved by the supervisor. A supervisor (particularly an off-site supervisor) cannot oversee and control all the actions of the supervisee, and the supervisee must be held accountable for their own actions, particularly after achieving full registration. This is especially the case for supervisees who are already registered psychologists pursuing higher degrees, where any legislative change must respect the universities' autonomy in regard to managing course field placements, while allowing for the legal capacity of such registrants to work without supervision when not undertaking Masters placement requirements. These types of supervisees have their own professional indemnity and accountability to the APS Code of Ethics (2007).

The issue of the role and legal responsibilities of the employer also need much more careful consideration by PsyBA than Consultation Paper 12 provides.

We also strongly urge PsyBA to lobby for government funding of workforce planning surveys to be planned collaboratively (with the profession and the universities) and conducted by an independent research body (other than Health Workforce Australia) before finalising these initiatives on supervision and the associated proposed national examination. We understand that there will be reviews of public health sector workforces beginning in 2012 by HWA. However the majority of generalist psychologists, organisational psychologists, educational psychologists, sports psychologists, forensic psychologists etc. have never worked and do not now provide services in public health. Data needs to be formally collected on the roles and the required competencies of supervising psychologists in non-public health contexts.

Governments and PsyBA should also be aware that it is vital to protect the diversity of the funding base for the Psychology profession, in employment terms. Converting all psychologists to quasi-clinicians would destroy the capacity of many registrants to find gainful employment outside the health sector.

PsyBA's apparent assumption that graduates training in clinical skills would find ready employment in the health sector, or alternatively would be readily employable in non-health fields, must be challenged. The high level of employment of psychologists reported by the Australian Bureau of Statistics would be adversely affected, with many ripple effects, some damaging to governments (such as and particularly poor availability of psychologists trained to deliver the many non-health psychological services that are now delivered to government departments or the public on their behalf).

Lastly we would like to see a shift from compliance oriented thinking by PsyBA to a more positive, incentive oriented approach for psychologists to participate in supervision. While the development and enrichment of a profession are primarily a joint matter for the profession and the universities, regulatory units have a supportive role to play.

Reforms around supervision should provide an incentive for individuals to become supervisors, not burden them with more regulation, training and compliance, or use supervision standards as a means to create quasi-clinical psychologists. Furthermore, as suggested in this document, the mandated, compliance approach of the PsyBA may well be alienating psychologists in Australia. The decision to engage in the supervision of the nation's future psychologists is a choice that

that can only be made by the individual (registered) psychologist. Despite a desire to sustain the profession, suitable individuals may well decide to not supervise others. Such a decision may well be an attempt to gain some sense of professional autonomy in order to counter the heavy compliance, and at times costly and restrictive requirements, introduced by the PsyBA since 1 July 2010.

Given the existing and potentially greater shortfall of supervisors of all three kinds, the focus needs to be on how potential supervisors across the Psychology spectrum can be rewarded, encouraged and recognised, instead of alienated and disengaged.

SUBMISSION ENDS

Attachments:

- Appendix A: Survey
- Appendix B: List of Universities Contacted as part of this COP submission to CP 12

▪ APPENDIX A

SURVEY

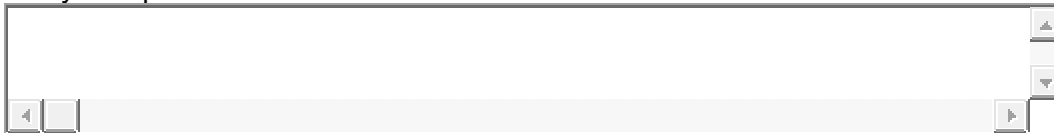
Response to Consultation Paper Twelve by the Psychology Board of Australia

This survey is designed to tap the views of organisational psychologists who are currently supervising or intend to provide supervision of provisional psychologists, masters degree students completing field placements and psychologists seeking endorsements in a specialist area. The following questions are based on specific proposals and quotes from consultation paper twelve released by the Psychology Board of Australia.

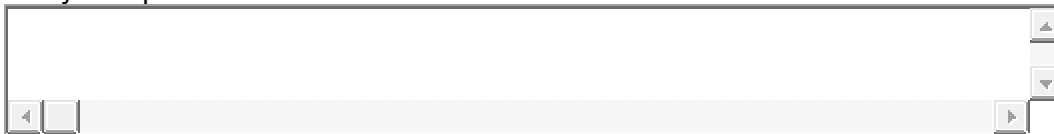
1. Are you planning to provide supervision over the next twelve months?

- Yes
 No

2. The Psychology Board of Australia is proposing that from July 30th 2013, that all supervisors must attend training (including supervisors for higher degrees). Please share your opinion on this.

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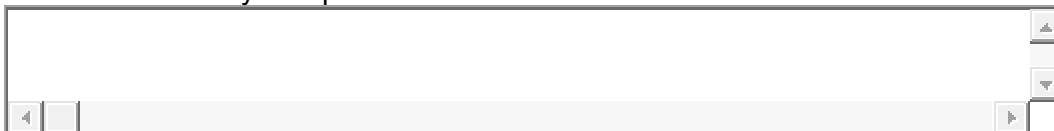
3. Limited exemptions will apply, based on recent (within 5 years) completion of approved supervisor training, and/or expertise (i.e. peer review publications and involvement in providing approved supervisor training programs), and will provide a limited grace period to allow supervisors to obtain training during the transition after 30 June 2013. Please share your opinion on this.

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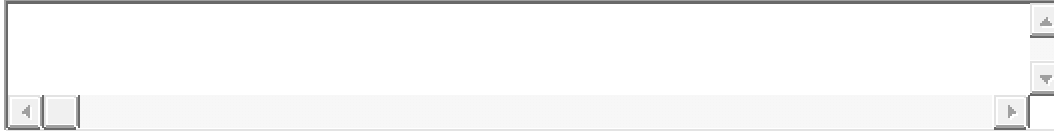
4. The Psychology Board of Australia has stipulated seven competencies which are required of supervisors. These competencies are:

1. knowledge and understanding of the profession
2. knowledge of and skills in effective supervisory practices
3. knowledge of and ability to manage the supervisory alliance
4. ability to assess the psychological competencies of the supervisee
5. capacity to evaluate the supervisory process.
6. awareness and attention to diversity
7. ability to address the ethical and legal considerations related to the professional practice of psychology.

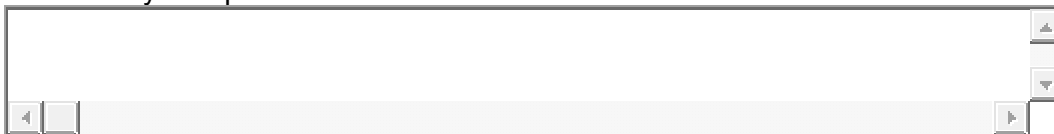
Please share your opinion on this.

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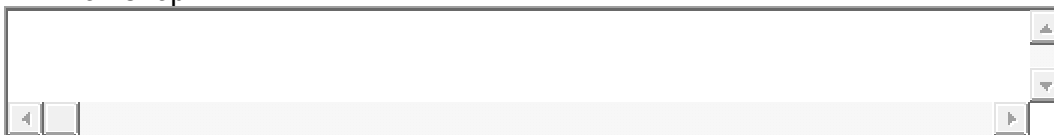
5. The Psychology Board of Australia has stipulated that supervisors must have a knowledge of practice across the human lifespan, which involves demonstrating the core capabilities with clients in childhood, adolescence, adulthood and late adulthood relevant to the supervisee's supervision plan. Please share your opinion on this.



6. The Psychology Board of Australia has indicated that it sees supervisory training programs as taking a variety of forms. There is a general suggestion that supervisory training should take two days face to face training and involve seven hours of preparatory reading. Please share your opinion of this.



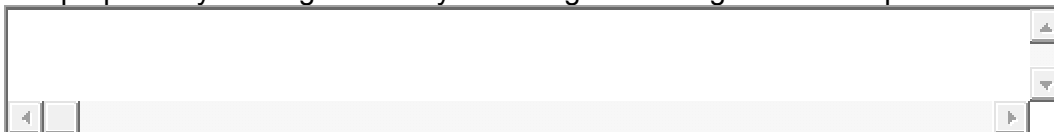
7. It is important that effective training draws on context and experience that is relevant to organisational psychologists. Who do you think should run the supervisory training workshop?



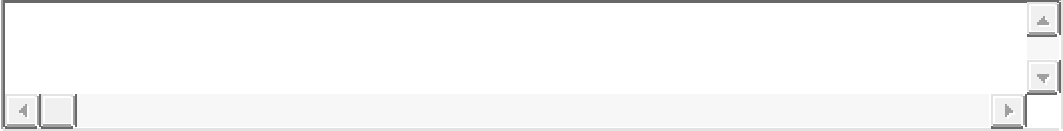
8. What impact would attending a two day face to face workshop with seven hours of preparatory training have on your fees for providing supervision?

- My fees will increase
- My fees will decrease
- My fees will stay the same
- I will continue to provide free supervision
- I will have to start charging for supervision

9. What impact would attending a two day face to face workshop with seven hours of preparatory training have on your willingness to register as a supervisor?



10. Thank you for completing this survey. Your information will be used to inform the submission being developed by the National Regulatory Working Party for the College of Organisational Psychology. The submission may paraphrase or summarise your responses. Please advise if you do not want your responses to be used in the submission, or have any other comments that you wish to add.

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APPENDIX B

List of Universities Contacted as part of this COP submission to CP 12

University of Queensland
Griffith University
Deakin University
University of Adelaide
University of NSW
Macquarie University

Note: not all field co-ordinators were available to comment during the survey period.