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Professor Brin Greyner, Chair,  
Psychology Board of Australia  
G.P.O. Box 9958  
Melbourne VIC 3001

Dear Brin,

**Re: Consultation Paper 12: Guideline for Supervisors and Supervisor Training Providers**

The APS College of Counselling Psychologists would like to make the following points about the proposed guidelines for supervisors and supervisor training providers:

1. The college appreciates that supervisors should be trained in the competencies of supervision. This is particularly important with the increased standards required for the 4+2 and 5+1 internship programs as well as the registrar programs for endorsed psychologists. In these programs, usually one supervisor takes individual responsibility over one or two full years to ensure that the psychologist meets the competencies to practice as a psychologist or an endorsed psychologist.
  - (i) However, we have serious reservations about insisting that all placement supervisors of postgraduate university programs complete supervision training. We are very concerned that this will substantially reduce the number of approved supervisors and thus, placements for students. Universities are currently struggling to obtain enough placements for their postgraduate students and any reduction in supervisors will likely lead to a fall in the number of postgraduate places available. Different to the intern or registrar programs, the responsibility for supervision of postgraduate students is shared between multiple supervisors (at least 3 placements and different supervisors) and between university academic staff and external supervisors.
  - (ii) In addition, where supervisors do not provide competent supervision, universities do not continue to place students with that supervisor. In short, there are already systems in place to ensure competent supervision within higher degrees. In addition, the counselling psychology programs already provide significant guidance, contact, mid-placement visits and coaching for their placement supervisors. There have been multiple closures of postgraduate programs in a number of specialty areas. We are concerned that these proposed requirements will add further burden to the delivery of postgraduate programs and consequently limit postgraduate places in counselling psychology as well as other specialties. External supervisors provide an important service and they are not normally paid for their extensive input, nor is their agency reimbursed.

- (iii) External supervisors may look to universities to fund their training. Given that postgraduate programs already run at a loss at most universities, this will further make the delivery of such programs more unattractive for universities. We suggest that the PsyBA remove this requirement for university placement supervisors, or at the very least significantly delay its implementation.
2. Regarding the proposed assessment for the supervision training, we are concerned about the production of a DVD of a supervision session. First, this places a significant burden on the supervisor to access equipment and obtain supervisee consent. Second, we also have ethical concerns in terms of the discussion of cases and the storage of such DVD's including the viewing of them by multiple trainers or supervisors. Sensitive client issues are very often discussed in supervision and we are worried that clients are typically not given the right to informed consent in terms of not just supervisors but rather, trainers of supervisors hearing their particular issues discussed. Even if names are not used, many of us have had the experience in peer supervision groups of recognising a client story in someone we know and needing to stop the discussion about that particular client. In short, we have concerns about client confidentiality.
  3. We suggest that the timelines for the implementation of the requirement of supervision training be delayed. By the time the final guidelines are produced, training providers submit their curriculum, and packages are approved, it is likely to be mid-2012 or later. There are currently training programs available in only 3 states, and to our knowledge these are not yet available in the other states/territories. This currently limits training to these providers, which means they have a monopoly on the market. This then allows psychologists in other states only one year to complete the training to continue to supervise. These targets are ambitious given the PsyBA has not yet given an indication of which additional training might be approved.
  4. Endorsed areas have specific supervision requirements. Training offered ought to be tailored to these requirements rather than being generic. In addition, training should be as low-cost as possible as it creates a significant additional burden on supervisors. The high cost of some of the current training providers and the demand of work-release time will make this prohibitive for many non-government agencies and indeed for those in the public sector. For psychologists who only do a small amount of supervision, the cost-benefit of completing training may not be worthwhile. We will then lose those supervisors at a time when it is increasingly difficult to find supervisors in areas of endorsement.

Yours Sincerely,



Michael Di Mattia  
Chair, National Executive, APS College of Counselling Psychologists