

20 January 2012

Psychology Board of Australia, Level 8, 111 Bourke St., Melbourne. Vic 3000.

Dear Chair, Psychology Board of Australia

## Re: Proposed Guidelines for Supervisors and Supervisor training Providers.

As Manager of Psychology Services Alfred Health I am writing on behalf of myself and my staff to express concern regarding the Board's proposed guidelines for supervisors and supervisor training to be implemented in mid 2013. While the need for adequate training of supervisors and improved regulation of supervisory standards is supported, there is concern that the proposed requirements set out in the guidelines will act as a significant disincentive to becoming a Board approved supervisor and taking on the supervision of post graduate psychology students and registrars.

The requirement of 7 hours preparation, 14 hours of direct training and the completion of assessments including having supervision sessions observed or video-taped seems an onerous requirement in terms of time as well as financially especially for psychology staff who have many years experience working as psychologists and clinical supervisors.

The majority of our supervisors are part time staff who under award conditions in Victoria receive an allocation of two days paid professional development leave per year – thus staff may be required to use all their professional development leave to undertake the training. Full-time staff receive five days professional development leave – so it also represents a significant proportion of their professional development allocation. In terms of funding, staff are rarely fully funded to undertake courses and with all supervisors expected to undertake the training this would represent a significant financial burden to the organisation at a time when budgets are tight. For example, the cost for the two day Supervisor Training and Accreditation Program run by Griffith University (Board Approved) is \$795.00.

Staff have already indicated a reluctance to undertake the training if they are required to use all or a significant proportion of their professional development allocation and to fully or part fund the training. Staff perceive taking on a student as something that is largely done out of goodwill and their commitment to the profession.

These requirements will create a further disincentive.

The proposed guideline does not take into account the significant training and experience that many currently recognised supervisors working in public health have achieved thus making the proposed requirements excessive.

The requirement for supervisors to have their supervision sessions observed or to provide videotapes of supervision sessions seems excessive and would be difficult to organise. The proposed guidelines do not take into account that psychologists are already required to obtain supervision regarding their work as psychologists which could include supervision of their supervision processes.

The time frame for the implementation also seems unrealistic – June 2013 - there appear to be very few Board approved courses available – the only one I am aware of being offered in Melbourne is the Griffiths Course noted above. It is hard to imagine how all current and aspiring supervisors will be able to complete the training in this time frame.

It seems unreasonable that the supervisor training requirements are essentially the same for:

- 1.4 + 2 and 5 + 1 internships
- 2. Provisional psychologists undertaking a Board approved APAC accredited higher degree program
- 3. Psychologists undertaking a registrar program leading to endorsement in an approved area of practice.

I would have expected that the requirements might be less strenuous for those supervising groups 2 and 3 – given their involvement in the more rigorous post graduate training program.

In order to make supervisor training more realistic and achievable, the following changes are proposed:

- A reduction of the supervisor training requirements overall especially for those providing supervision to groups 2 and 3 listed above.
- A graduated model, whereby supervisors already approved by the Board be granted retrospective credit and only be required to complete a one day refresher course by the end of 2013 or mid 2014.
- A removal of the requirement to provide videotapes of sessions or to have sessions observed. Once supervision training has been completed, review of supervision practice could be covered as part of the psychologist's standard supervision arrangements with the psychologist's supervisor providing formalised feedback to the board if necessary.
- Exploration of a variety of training models including on-line training.

In summary, there are significant concerns about how the proposed changes will impact on supervisors currently working in public health services. Supervisors currently supervise out of a sense of goodwill and commitment to the profession, these proposed changes appear excessive and unreasonable for highly qualified and experienced staff and is likely to create a significant disincentive to retaining or achieving Board approved supervisor status, which can only have a negative effect on the profession.

Yours faithfully,

Lynda Katona, Manager Psychology Services, Alfred Health