

26<sup>th</sup> April, 2018

Dear Psychology Board of Australia,

I am writing to you in regards to the public consultation document “Revised guidelines for supervisors and supervisor training providers” (dated 5<sup>th</sup> March, 2018).

For context, my role as Placement Coordinator for the Master of Psychology (Clinical) program at Australian Catholic University, and National Professional Practice Lead (Psychology) for our National School of Psychology has ensured that I am very familiar with the Psychology Board of Australia’s guidelines and regulations regarding supervision (and until recently, the 2010 Australian Psychology Accreditation Council (APAC) standards). Sourcing and retaining high quality placements for our students, and maintaining collegial relationships with supervising psychologists is my key business, and thus I review the revised guidelines with a particular focus on approval of supervisors to support Higher Degree pathways of training. I’ve read the draft guidelines in close consultation with the recently released 2019 APAC standards, and my comments are as follows:

In principle I am supportive of the move to collapse nine of the current Board Approved Supervisor (BAS) categories into one Board Approved Supervisor (BAS) category, and the consistent requirement for psychologists to have held general registration for at least three years prior to being eligible for BAS status once they have completed full-supervision training.

Including the current category of Higher Degree Placement supervisor within the new broad category of Board Approved Supervisor will respond to some challenges that Higher Education Providers have had to navigate since 2013 and the upcoming conclusion of transition arrangements. For example, it was not always clear when vetting potential placement supervisors whether they were not approved as a Higher Degree Supervisor because they were ineligible, or simply because they had not ticked the respective box on the form.

The current guidelines, while they indicated that area of practice endorsement was not a requirement for supervisors of students enrolled in a 5<sup>th</sup> year program, once transition arrangements concluded, eligibility criteria to become an approved Higher Degree Placement supervisor would have excluded psychologists without an area of practice endorsement. This would have unnecessarily limited the pool of appropriately qualified and skilled psychologists who could provide placement opportunities to these students.

Establishing a baseline of approved supervisor status (the new BAS category) and then referring to APAC guidelines to provide additional guidance in regards to the credentials of Supervisors of Higher Degree students on placement seems the inherently sensible option. However it is crucial that these documents (APAC guidelines and accompanying evidence guide) work together, as currently the eagerly awaited 2019 APAC guidelines refer back to the board’s supervision guidelines for additional input.

While it is clear that for programs that warrant it, an area of practice endorsement requirement will remain in addition to BAS status for supervisors of Higher Degree student placements, it is not clear whether the requirement to have held endorsement in the relevant area of practice for at least two years prior to beginning supervision, is being removed or retained. I am supportive of this prescription being removed. Universities have the provision to set standards that are above minimum requirements, and there seems to be little risk to the public in removing this requirement, particularly in the context of three years practice being the minimum standard prior to eligibility for BAS status.

With regards,

Dr Sarah Stewart  
Clinical Psychologist