

Submission by the Clinical Psychology Reference Group

Consultation Paper 29: Revised guidelines for supervisors and supervisor training providers

5th March 2018

Introduction

The Clinical Psychology Reference Group (CPRG) of the Health Department of Western Australia welcomes the opportunity to comment on the Psychology Board of Australia (PsyBA) Public Consultation Paper 29 – Revised guidelines for supervisors and supervisor training providers. The CPRG acts as the peak professional body for Clinical Psychologists and Clinical Neuropsychologists working within the Health Department of Western Australia.

Discussion of proposed changes

The CPRG strongly supports the proposal that all supervisors should have held general registration for a minimum of three years, thereby removing any categories in which only two years of general registration was required.

The CPRG also does not see any problems in splitting the ‘Guidelines for supervisors’ and ‘Guidelines for supervisor training’ into two separate documents.

The CPRG is, however, very concerned by the suggested change to the registration requirement for “higher-degree placement supervisors (excluding fifth year in 5+1 pathway)”. Specifically, we note that the current standard requires supervisors to have held endorsement in the relevant area of practice for at least two years. The proposed new standard is a lesser requirement of holding only general registration for at least three years, with no requirement to hold an Area of Endorsement at all. The CPRG considers this proposal would unacceptably compromise training standards and the competency of graduates. The CPRG is most concerned that such an arrangement could enable higher-degree providers to allow non-endorsed Psychologists to provide practicum supervision to students enrolled in APAC-accredited courses for “Specialised Areas of Practice”. The CPRG holds that such an arrangement could enable higher-degree providers to allow non-endorsed Psychologists to provide practicum supervision to students enrolled in courses for “Specialised Areas of Practice”. Such arrangements would be expected to impact the quality of training and raise questions about the competency of graduating students. The CPRG strongly believes that registration requirements for

“higher-degree placement supervisors (excluding fifth year 5+1 pathways)” should NOT change. That is, supervisors should have held endorsement in the relevant area of practice for at least two years. This category could either be a third category of “Board Approved Supervisor” *or* combined with the “Registrar program principal supervisor” category.

The CPRG strongly opposes the change to only holding general registration for three years, with no requirement for holding an area of endorsement. Further, in the interests of patient safety and protection of the public, the CPRG would not support the employment of job applicants (whether on short contracts or permanent) for whom their higher-degree training comprised practicums with supervisors who did not hold area of practice endorsement, specifically in clinical or neuropsychology.

The competencies of Psychologists with only general registration have not been tested at university higher-degree level, yet the Consultation Paper seeks to allow them to supervise the clinical practicums of higher-degree students purely on the basis of years of practice. In terms of protecting the public, this would effectively obfuscate what “higher-degree training” represents. Additionally, the Consultation Paper proposal on this point ostensibly gives legitimacy to generally registered psychologists, as supervisors, practising outside their competence and effectively undermining the public protection of higher-degree training.

As a corollary to the above, given that available supervisor training courses are focused on the process of supervision and not specific clinical content, the CPRG holds the view that initial supervisor training (and subsequent refresher) courses do not provide a training standard that is sufficient to protect patient safety, international professional standards, or the public. For psychologists who have not completed an accredited higher-degree nor attained endorsement, these supervisor training courses alone are insufficient to ensure such protections. It is for this reason that the CPRG also disagrees with proposed changes to Supervisor Competencies. The CPRG is opposed to the Board’s proposal that ‘Competency 1: Knowledge and understanding of the profession’ be removed. We believe that removal of this fundamental competency will weaken supervisory practice, a cornerstone of our profession.

Summary of recommendations

- The CPRG does not see any problems with splitting the ‘guidelines for supervisors’ and ‘guidelines for supervisor training’ into two separate documents.
- The CPRG strongly supports the proposal that all supervisors should have held general registration for at least three years, thereby removing any categories in which only two years of general registration was required.
- The CPRG strongly believes that registration requirements for “higher-degree placement supervisors (excluding fifth year 5+1 pathways)” should NOT change. That is, they should have held endorsement in the relevant area of practice for at least two years. This category could either be a third category of “Board Approved Supervisor” *or* combined with the “Registrar program principal supervisor” category. We *strongly oppose* the change to only holding general registration for three years, with no requirement for holding an area of endorsement.

- The CPRG is opposed to the Board's proposal that 'Competency 1: Knowledge and understanding of the profession' be removed. We believe that removal of this fundamental competency will weaken supervisory practice, a cornerstone of our profession.
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