



**Attention: Chair, Psychology Board of Australia**  
**Delphin Swalm** to: natboards  
Bcc: NatBoards

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Regarding the "Consultation paper on registration standards and related matters": I'm opposed to mandating 10 hours of individual supervision for Psychologists although I am in favour of the Board strongly recommending this modality to discuss difficult cases &/or ethical dilemmas, or when expanding one's expertise into areas for which one has not been formally trained (as covered by ethical codes).

It is naïve to suggest that discussing one's practice in a reflective manner with a peer will translate into the safe treatment of clients. I can well imagine that in some cases we'd like to "see" what a psychologist is doing to ensure that they're not out of line with current best practice standards, but mandating 10 hrs of individual supervision won't provide a window into the psychologist's office. An errant psychologist could present his or her "good cases" in supervision, skirting the issue of incompetence. A far better approach would be to contact a random sample of his or her patients and survey their satisfaction etc: unfortunately, that's not ethical. Hence we're left with the complaints mechanisms: perhaps complaints procedures should be more widely advertised to ensure that dissatisfied patients are more likely to complain.

I very much doubt that 10 hrs of supervision will prevent complaints; instead we should see the complaints process as necessary and helpful in providing feedback about psychologists.

Finally, I doubt whether other health care professionals (eg, general practitioners) are required to demonstrate that they've participated in annual individual supervision; this seems an inequitable and undeserved burden. Indeed it's an insult to competent practitioners with considerable experience who work within their areas of competence and have the good sense to discuss issues with peers as required by telephone or over lunch.

Sincerely yours,  
Delphin Swalm  
Clinical Psychologist in Western Australia