



**Submission re 'Revised Guidelines for Supervisors and Supervisor Training Providers' Consultation
No. 29 – Heads of Dept. and Schools of Psychology Association (HODSPA)**

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We would like to begin by thanking the Psychology Board of Australia (PsyBA) for the opportunity to provide feedback on the above paper.

We agree with the increased flexibility that comes with the reduction to two categories of supervisor, as recommended. Our Placement Coordinators also see this change as valuable (personal communication.) However, the specifics are underpinned by the Australian Psychology Accreditation Council (APAC) Guidelines (see 32.), which are vague. This will cause problems. On the one hand, the flexibility that the PsyBA has introduced may not be taken advantage of as providers take a 'safety first' approach. Alternatively, APAC assessors with a narrow focus could use the vagueness of the APAC guidelines to undo the flexibility embedded in the PsyBA recommendation!

Of course, there is some variation in the views of the members of HODSPA. Some wish to see all placement supervisors hold an Area of Practice Endorsement (AoPE). They suggest that anything else could be deemed as lowering standards. However, most members are happy with the recommendation and argue that if an institution wants to use only AoPE endorsed supervisors, they can do that.

Indeed, some have argued for further flexibility and we will develop that argument here. Thus, some members argue that no placement should require an AoPE-endorsed supervisor, although the placement would still be identified as 'clinical' or 'organisational'. (This requirement is especially problematic for the non-clinical specialties.) The argument for this change is as follows:

1. A student who completes a 2-year specialist Masters program can only apply for general registration at end of the two years. Given that this is the case, why do they need to be supervised by specialists?
2. Clearly, not all students will complete a registrarship. We suspect that students completing a non-clinical specialty are less likely to pursue a registrarship because they gain no direct financial advantage from an AoPE due to the lower level of MBS (Better Access) rebate. This data would be useful.
3. The PsyBA has argued that students completing a 'specialist' Masters program should complete the National Psychology Examination prior to registration as a 'generalist' psychologist. This examination assesses them for competencies required for 'generalist' registration. Hence, why should they be supervised by someone with an AoPE endorsement? It is the registrarship, supervised by someone with an Area of Practice Endorsement, which enables a graduate to gain their relevant AoPE.
4. Indeed, it is worth noting that not all students seek employment following completion of their degree. Thus, some 15% of graduates of professional programs indicate that they are not in employment and are not seeking employment. Why then do they need guidance from an AoPE specialist supervisor? Given an annual intake of approximately 1450 students, assuming three placements, the 15% who do not seek employment represent some 650 registered supervisors. If we add to this number those students who are employed, but do not pursue a registrarship, we are employing significant resources for no obvious benefit, such as the protection of the public.

If in the future, these graduates decide to seek AoPE registration, they will have to complete the 2-year registrarship, overseen by a supervisor who holds an AoPE. Hence, they will gain the requisite specialist experience.

The above underpins the current consultation document whereby the PsyBA specifies two categories of supervisor, the 'generalist' who supervises a student during their training program and the 'specialist' who supervises the graduate as they seek AoPE endorsement. Given the parlous state of non-clinical programs around the country, the above would go some way to alleviating the pressure on these programs.

We agree with the requirement that registrants wait three years following their registration before they can embark on supervisor training for the arguments given.

Specific points follow:

1. We would like to see data on successful completion of supervisor training programs. PsyBA has useful statistics on its web-site and in the present document informs us about how many people wait for three years before seeking supervisor status. To comment meaningfully on the supervisor training program, we need to know these numbers. If they are low, we need to question what we are doing, especially in context of declining numbers of supervisors. We do expect them to be high given the background of applicants, but it would be useful to know – what percentage (number) pass at each 'sitting', first, second, or third? How many fail?
2. Point 44 - Colleagues suggested that an additional supervisor competency be added to the list, namely Falendar and Shafranske's understanding of systemic issues (*Interdisciplinary Systems*).
3. Point 45 - It would be useful for the Board to provide clearer guidelines or standards in relation to the management of supervision records (for both supervisors and supervisees).
4. Point 58 – We agree with the Board's proposal to allow extension on Part 3 completion date in extraordinary circumstances.

In sum, HODSPA and our placement coordinators agree with Option 2 as put forward by the Psychology Board of Australia.