

Supervision Guidelines – Submission

From: Occupational Therapy Discipline, James Cook University

Prepared by: Professor Matthew Yau, Dr. Yvonne Thomas & Ms Bronwyn Tanner

We think that the scope and principles of the supervision guidelines are clear and provide a clear direction regarding the purpose and flexibility inherent in this document. A mechanism for supervised practice also provides a useful interim arrangement and pathway to registration for qualified occupational therapists who are unable to achieve full registration for a variety of reasons. The proposed guidelines illustrate a range of levels of supervision that may be provided in the workplace.

Followings are comments and concerns we would like to raise for the Board's consideration and clarification.

Comments regarding Scope of Guidelines

The guidelines refer to "Practitioners with limited or provisional registration, or with conditions or undertakings related to their registration". They reflect however the situation where an individual is wishing to work as an occupational therapist. In the past there have been instances in Queensland where qualified occupational therapists who have, for reasons such as extended work in non-OT positions, allowed their registration to lapse. Such an individual has wished to apply for re- registration but not necessarily work in an OT practice role. Previously the OT board in Queensland has set up a process of eligibility for re- registration via the establishment of an agree plan of action that included a 'remote' supervisory relationship. Is it possible for the document to broaden its scope to include consideration of this type of situation?

Comments regarding Direct Supervision

From a pragmatic perspective, the level of 'Direct Supervision' in the workplace is costly and particularly difficult for small organizations, or workplaces in rural and remote communities to undertake. The level of responsibility and intense involvement of the supervisor in all aspects of clinical practice would be difficult to accommodate and sustain over any sustained period and would be ineffective for the workplace. There would be little incentive for any workplace to offer this level of supervision, especially to a person not previously been employed in the setting. Some consideration of remuneration for this level of supervision may be necessary to encourage supervisors or workplace organizations, to take on this additional role.

The proposed guideline states that this level would be for 'less than one week or eight sessions'. If the condition of supervised practice arises from a health condition, conduct or performance plan, direct supervision over a prescribed period is not the most effective method to be able to identify issues of competence to practice. There may be greater advantage in requiring direct supervision to be a random, intermittent requirement of eight sessions over a longer period of time and therefore as an additional requirement to the role of indirect supervisor.

While direct supervision is necessary for students at the onset of their training, this level of supervision indicates a presumption of very high risk to clients. Direct supervision as outlined in this document conflicts with the role and definition of supervision, direction and guidance

as outlined in the document. Direct supervision emphasizes the role as assessor and evaluator of competence and safety with client. The nature of such a relationship undermines the principles of supervisory relationships and indeed the definition outlined in the document. While there is an assessment component of many supervisory roles, the emphasis here is shifted, and negates the role of supervisor to develop the assumption of “responsibility for their own practice”.

Comments regarding Level of Supervision

“The starting level of supervision and the progression through the levels of supervision will be determined through the approval by the Board of the individual’s supervised practice plan, and as agreed by all parties” (p.5)

This statement seems to require further clarification and specification:

- Who determines the level of supervision: the Board, employer or immediate supervisor at work?
- Should the Board be the one to decide the level of supervision required when the practitioner applies for registration at the first instance? However, this may limit the scope of employment that the supervisee, who is required to have Level 1 supervision, can take as not all organizations are willing to take him/her on due to costs and supervision demands as mentioned above.
- Should there be explicit criteria for determining the level of supervision and be known to all parties involved?
- What happens if the supervisee does not agree with the level of supervision prescribed? Will there be an appeal/judiciary penal to handle disputes and grievances arise from the supervisory process?