



**Occupational Therapy  
Board of New Zealand**

Kaihaumanu Tūroro o Aotearoa

14 June 2012

Occupational Therapy Board of Australia  
GPO Box 9958  
Melbourne  
VIC 3001

Via email: [otboardconsultation@ahpra.gov.au](mailto:otboardconsultation@ahpra.gov.au)

Thank you for the opportunity to provide some comments, feedback and suggestions on the proposed Supervision Guidelines for Occupational Therapy.

Feedback has been provided in the following format:

1. General comments.
2. Specific referenced points within the document using page numbers

**General comments**

1. Professional development: This should not to be excluded from the scope of supervision. As stated in the introduction 'consumers of occupational therapy services have the right to expect delivery of safe, competent and *contemporary* occupational therapy services at all times'. Professional development is part ensuring that contemporary services are being provided. We are not sure of the rationale to exclude this from the guidelines. You may of course have professional supervision covered by other guidance that we are not aware of.
2. Scope: The New Zealand experience has been that there has been confusion amongst the profession about the differences between the different kinds of supervision. A recent review of supervision by the Occupational Therapy Board of New Zealand (OTBNZ) has resulted in changes that will be implemented across all the OTBNZ documents. The intention is to ensure that the definition and rationale for supervision are the same-regardless of the level of practitioner. This change in perspective arose from consultation with the profession in New Zealand as well as an extensive literature review of supervision practice. I have attached a copy of the report for your information.
3. New graduates: The guidelines specifically mention that they do not include the supervision of new graduates. We would suggest that new graduates should be included within the scope for the supervision guidelines. New graduates also need to adhere to the minimum competencies, code of conduct, and have the direction and guidance mentioned in the definition of supervision. This point is particularly important if new graduate practitioner from either New Zealand or Australia uses the Trans Tasman Mutual Recognition Agreement (TTMRA) to register and work in our respective countries. It is our understanding that under the TTMRA conditions on scopes of practice must have equivalence applied between the New Zealand and Australian jurisdictions. It would be helpful to understand how we replicate or manage our respective systems for supervision conditions on practice.

4. It is suggested that all occupational therapists should engage in regular supervision (not just those with conditions), the 'level' of supervision may be determined by the condition or not that is held by the occupational therapist.
5. Direct supervision definition: We suggest that the definitions section should refer to the supervisor taking direct responsibility for the provision of the occupational therapy service, or say the supervisor is in a position to observe and work with the supervisee when the supervisee is providing occupational therapy services (to remain consistent with Table 1).
6. We think it is important to identify very early in the guidelines the progressive nature and application of the model you are proposing.
7. No mention is made of how "failing" in supervision would be managed by the Board. One presumes that the National Law has provisions to manage such matters under competency provisions. We suggest that this should be added or referred to in the guidelines.
8. We suggest that the guidelines should include a definition for 'level 4' supervision in the definitions area of the document. Consider changing the standard reporting frequency (for level 4 supervision) to be longer than 3 months (6 monthly or yearly, or if there are concerns developing). This level appears to be more about maintenance of standards/competency.
9. Requirements of supervisors: Someone who is skilled at supervision is likely to hold a position that is higher than the occupational therapist under supervision. However, the supervision relationship should not be determined by supervisors' remuneration/classification. Having met the requirements specified in the definition of supervisor, it is more important to have someone with appropriate supervision skills (than higher pay or 'title'). Also if remuneration is a determining factor how would practitioners working part-time be interpreted.
10. Responsibilities of supervisees: 'Complete and forward a supervision agreement with application for registration'. This may end up not being very practical time wise. Locating someone to act as a supervisor, prior to having registration or employment may actually not be very practical. It would be better to state that the supervision agreement needs to be in place *prior* to starting practice.
11. Will there be a national /state list of suitable supervisors? How will new graduates, those returning to work in Australia from overseas, and those new to a region etc know/find the supervisor to set up the arrangements in the first place.
12. Will there be guidance on the need to inform clients who are receiving services from an occupational therapist who is subject to supervision conditions? If the Board operates an on-line register which allows members of the public to check whether practitioners have a current registration, will it also show the supervision conditions?
13. Has the Board had discussions with employers about the cost of providing supervision within their respective organisations? The experience in New Zealand is that supervisors apply a cost to their supervisory practice. The OTBNZ does not involve its self in this matter it is something between the supervisor and supervisee.
14. Are supervisors going to be paid for providing supervision and providing reports to the Board?

### **Specific referenced points within the document using page numbers**

15. Page 2 – **summary**. Please consider mentioning something about requirements for practitioners from New Zealand with conditions on their scope of practice, as described in point 3 above.
16. Page 2 should also contain information of how the supervision guidelines apply under TTMRA.
17. Page 4 – **A supervisor** - It is not clear in the document what criterion is going to be used to assess the suitability and/or qualifications of a supervisor.
18. Page 4 1. **Principles** – It would be helpful to see early references to the Boards competency standards. Moreover, we feel it would be helpful to indicate that the competency standards are the measure or tool that is being used to assess practice, if this is the case.
19. Page 5 – **specific requirements for those practising under supervision as a requirement for limited registration** – We are unsure what limited registration means. There is also opportunity in this section to make reference to the TTMRA requirements referred to above.
20. Page 9 – **responsibilities of the supervisor include to:** This title does not read well and we would suggest rewording to **responsibilities of the supervisor are to:** and change point 1. To act within the level of supervision.....
21. Page 10 – 5. Responsibilities of supervisees – point 2 suggest making reference to Board approved supervisor.

We hope you find the comments useful, and we are only too happy to clarify any issues.

Yours sincerely,



Andrew Charnock  
**Chief Executive/Registrar**  
**Occupational Therapy Board of New Zealand**