

Submissions received - Supervision Guidelines

Board Decision

Background

The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) empowers a Board under s39 and s40 to develop and approve codes and guidelines to provide guidance to health practitioners it registers; and about other matters relevant to the exercise of its functions. The National Law requires the Board to ensure there is wide-ranging consultation on the content of any proposed code or guideline.

Accordingly, the Occupational Therapy Board of Australia (the Board) developed a consultation paper on its proposed guidelines for supervision. The guidelines sought feedback on the principles the Board considers central to safe and effective supervision for a range of regulatory needs.

Submissions

The public consultation period ran for a 4-week period during 21 May to 15 June 2012. A total of 20 submissions were received. Submissions which were approved for website publishing are available at the Board's website: www.occupationaltherapyboard.gov.au/News/Past-Consultations.aspx

The Board considered the issues raised by the submissions and further to any substantive comment, formed the following opinion:

Overview

- Clarification made to the purpose of the guidelines for use related to a range of registration and notification matters.
- Clarification made that the Board will determine supervision levels on a case by case basis, to enable flexibility in supervisory arrangements in consideration of the diversity of work settings (eg rural and remote settings), the complexities of different cases, individual capabilities and so forth.

Definitions

- For the definition of 'supervisor' an inclusion made that preferably supervisors will have more than two years experience as an occupational therapist.
- Consistency made between the wording used in the definitions with the wording used in references made throughout the guidelines.

As the guidelines already include a statement that supervisors must be approved by the Board, prior to developing supervision agreements and supervised practice plans and that they have statutory protection under the National Law, no further clarification was made to these statements.

1. Principles of supervision

- Note made that the 'supervised practice plan outlines the *anticipated* duration of the supervision period' as this period may need to be extended as a result of reporting from the supervisor.
- Clarification made that the Australian Minimum Competency Standards (ACSOT) for New Graduate Occupational Therapists are the measure that will be used to assess practice. The Performance Record for the Australian Competency Standards for Occupational Therapists 2010 (PRACSOT) has been developed as a reflective tool for use in conjunction with the ACCOST and is to be used to assess competence in practice in a consistent and objective manner and is included in supervision Reports, unless otherwise agreed by the Board.

2. Developing a supervised practice plan and setting reporting requirements

- For practitioners who have attained their primary qualifications outside Australia an orientation report template to the Australian healthcare system has now been included in the guidelines.
- For information in the levels of supervision tables, inclusion of the term 'clients' with references to the term patients, where required.
- Where a supervisee is on level 1 supervision requirements for an extended period, a change has been made from three monthly to monthly reports to complement both the higher degree of supervision required at this level, and consistency requirements throughout the guidelines.

As the Board will review the suitability of a supervisor in line with the purpose of the supervision and the individual circumstances under consideration it is unlikely that a supervisor, holding a position at a lower classification or remuneration level to that held by the OT under supervision, will be approved.

Further to the consultation period the Board has developed templates for a Supervised Practice Plan and a Supervisor's Report. These templates are based on the common frameworks used by the other regulated health professions, as published on their websites (see www.ahpra.gov.au).

3. Requirement, responsibilities and protection of supervisors

- Clarification made that a supervision agreement is to be completed and forwarded prior to commencing practice.
- Details are now provided to indicate that co-supervisory arrangements are permitted and clarification made on the circumstances that may apply in the 'different supervision arrangements' section. The Board appreciates that occupational therapists may practise in a variety of workplace settings and has accommodated this flexibility in its principles as a result.

4. Responsibilities of supervisees

- Clarification made that the supervised practice plan must be submitted within two weeks after commencing practice.

5. Reporting requirements

No substantive changes made for this section.

6. Changes in supervisory arrangements

- Where a change in supervisory arrangements is required clarification has been made to minimise the disruption to services.

- The Board notes that the guidelines address the issue of unsatisfactory performance and specify the requirement to practise in accordance with the supervised practice plan. The Board has included further guidance on this matter.
- The Board notes that the guidelines address what happens if the supervisory relationship breaks down. It is anticipated that these situations would be dealt with locally in the workplace first using existing dispute resolution policies and processes to assist on these occasions. To provide further guidance on this matter the Board has included further wording on dispute resolution.

7. Summary of procedures

No substantive changes made for this section.

8. Assessment and reporting requirements

No substantive changes made to this section.

Recommendation

Based on the above considerations the Board has agreed to make the subsequent changes to its proposed Supervision Guidelines, which are now published to its website www.occupationaltherapyboard.gov.au/Codes-Guidelines.aspx

These supervision guidelines will be reviewed at least every three years.