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## Re Supervision Guidelines

Occupational Therapy Australia is the peak body representing occupational therapists in Australia. I welcome the opportunity to comment on the draft supervision guidelines issued by the Occupational Therapy Board of Australia (OTBA), which are in general thorough and useful.

After consultation with Occupational Therapy Australia Divisions and members, I am pleased to offer several points which I think would strengthen the guidelines and make them better understood and used by occupational therapists, both supervisors and supervisees.

### **1. Title/introductory statements**

The term “supervision” is used to mean two separate activities in professional practice. As well as the use in this guideline, it also is part of ongoing professional development and for most practitioners this is the primary meaning. The guideline may therefore confuse some professionals, and there would be some value in either:

- a) changing the title of the document to more clearly reflect that the guidelines are specifically targeting “occupational therapy practitioners with limited or provisional registration, or with conditions or undertakings related to their registration” who are required to work under supervision rather than supervision per se.

and/or

- b) ensuring the statement below is placed earlier or more prominently in the document.

*“The scope of these guidelines is not intended to cover:*

- *supervision of students*
- *mentoring of new graduates or more junior practitioners*
- *performance review responsibilities of managers, or*
- *supervision for professional development”.*

### **2. Item 4: Requirements of supervisors**

The requirement that “Approved supervisor must not hold a position that is at a lower classification or remuneration level to the supervisee” suggests that supervisors will always be working within the same organisation/workplace as the supervisee with some line accountability. If a potential supervisor has relevant expertise and is employed in a different organisation, or a separate work area without line accountability, or in separate private practice, then it should not matter if they hold a lower classification or are being remunerated at a lower level to the supervisee.

### **3. Table 1: Length of periods on supervision**

The reporting framework seems to be more widely spaced than necessary in most circumstances to ensure good practice; 3 months is a long time between reporting for someone who is under supervision at level 2 and above. In total this would make supervision a lengthy process.

Occupational Therapy Australia believes that 3-6 months was enough time to validate an occupational therapist's skill in most circumstances and it would be helpful if this could be indicated in the guideline. There could be provision for supervision to be extended if warranted (particularly in those cases where someone is found to have breached professional standards).

### **4. Item 5: Responsibilities of supervisees**

In most cases the relationship between the parties is good and beneficial. But at times things can and do go wrong and it would be helpful in these circumstances to provide a greater clarity to the parties about the processes to be followed.

For example, if the supervisee has a problem with the supervisor but OTBA is not responsive or the grievance cannot be addressed directly with the supervisor what recourse does the supervisee have? The draft Guideline says that the supervisee should let the Board know of any breakdown in the relationship but it doesn't make it clear that this can be confidential from the supervisor and that it can be looked into by the Board without the supervisor being aware that a grievance has been lodged until the Board deems it necessary. Greater clarity in this area would be beneficial.

Either party to the arrangement should be able to seek support from their professional association in resolving any disputes arising in the relationship and this should be outlined in the Guidelines. OTBA should have a mechanism in place to address the concern that a very small number of supervisors can at times take advantage of the power they hold over supervisees and not act in supportive and helpful ways at all times.

Both parties should be able to make confidential reports to OTBA and draw upon the support of their professional association which should be recognised by OTBA as a party with standing in any dispute.

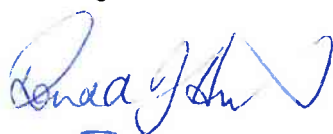
### **5. References**

The citation details provided for *The Australian Minimum Competency Standards* are incorrect. Citation details should be:

Occupational Therapy Australia (2010). *Australian Minimum Competency Standards for New Graduate Occupational Therapists (ACSOT)*. Brisbane: Occupational Therapy Australia Limited.

Thank you again for the opportunity to make these suggestions.

Kind regards



**Ron Hunt**  
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