



SUBMISSION TO AUSTRALIAN HEALTH PRACTITIONER REGULATION AGENCY PROPOSED OCCUPATIONAL THERAPY SUPERVISION GUIDELINES

The proposed supervision guidelines for the provision of supervision to occupational therapy registrants is a well considered document.

A number of questions and issues on reading through:

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*“A supervisor..... (**must usually have** a minimum of 2 years experience)”*

It is suggested that a supervisor **must have** 2 years experience – the usually suggests that there is some flexibility in this principle. It is the Queensland Board’s experience that at least 2 years would be required.

“Supervisors should not themselves be subject to supervisory arrangements....”

Most registered OT’s would be in some supervisory arrangement within the workplace. It is suggested that this may be changed to “supervisors should not themselves be subject to **Board or other disciplinary** supervisory arrangements....”

Principles

2. *“...need to accommodate changes in supervisors”*

It is the Queensland Board’s experience that consideration also needs to be given regarding changes in places of employment during the term of conditions and undertakings. This can affect changes in levels of supervision or length of condition/undertaking.

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“The supervised practice plan sets out the supervision requirements, including the expected progression through the levels of supervision and reporting to the Board or its delegate”

“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”



It is difficult to determine through the current guidelines whether registrant and their supervisor will know their starting level of supervision prior to the development of the plan, or if this is determined by the Board following its approval of the plan. It would be very difficult for the registrant and their supervisor to develop the plan without this information.

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Level 2 Supervision

- Can the alternate supervisor and / or supervisor 2 be another registered health professional?
- Is the registrant able to conduct visits (home, school, workplace) outside the designated workplace if the supervisor is available by phone? (a common question in our experience in Queensland)

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“A supervisee must not practise without a supervisor approved by the Board”

If a supervisor is unexpectedly off work for short periods, and there is no Board approved supervisor available, can the registrant stay working if there is no clinical contact?

Does the same apply to Level 4 supervision?

ADDITIONAL COMMENTS

- There has been situations in Queensland when registrants have undertaken 2 separate supervised practice simultaneously (i.e. 2 part-time positions). Is there the capacity to allow this?
- Will there be consideration of different levels of supervision dependent on how long a registrant has been away from practice (i.e. 5 years vs. 15 years)

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