

Revised Practice Advisory #15

Registrants Offering Practice Training and Supervision to Non-Registrants

DRAFT FOR REGISTRANT FEEDBACK

Practice Issue

The College has received questions from registrants regarding supervision of non-registrants.

Rationale

This practice advisory addresses practicum and internship opportunities for students and other non-registrants to ensure that registrants offer training opportunities, experiences, and supervision consistent with the Code of Conduct.

Non-registrants may be students seeking formal practica and internships to satisfy graduate program requirements, or individuals seeking informal practica, internships, training, or experience (e.g.s, a graduate student clinician seeking to gain experience with a particular client group, another professional seeking training or experience in a competency shared by various disciplines). Registrants may also be in supervisory relationships with non-registrants in the context of multidisciplinary settings or in contexts where there is an emphasis on collaborative care.

Selected Relevant Standards of the 2009 Code of Conduct

This advisory must be considered in the context of the Code of Conduct in its entirety with special reference to the following specific standards:

5.21 Appropriate training/supervision

A registrant must provide appropriate training to his or her employees and supervisees and must take steps to see that such persons perform psychological services responsibly, competently, and ethically.

5.22 Supervision to ensure standards

A registrant who supervises others in the provision of psychological services must ensure that the services provided meet professional standards and requirements of this Code.

5.23 Delegation of responsibilities

A registrant may delegate to his or her employees, supervisees, research assistants or any other person only those responsibilities that such persons are able to perform competently on the basis of their education, training, or experience, while unsupervised or with the level of supervision being provided.

7.11 Cooperation with other service providers

When it is indicated and professionally appropriate a registrant must cooperate with other professional service providers in order to serve the client effectively.

7.18 Conflicts between Code and institutional/organizational regulations

If the obligations of a registrant to an institution or organization with which the registrant is affiliated conflict with the registrant's obligations under this Code, the registrant must

- (a) clarify the nature of the conflict,
- (b) make known the conflicting obligation and the registrant's commitment to comply with this Code, and
- (c) to the extent feasible, seek to resolve the conflict in a way that permits full adherence to the Code.

8.6 Accountability for supervisees

A registrant is responsible and accountable for the actions of any non-registrant who is providing psychological services under the registrant's supervision.

8.7 Obligation to advise of responsibility

Where a registrant supervises non-registrants in the provision of psychological services, the registrant must advise the client that the registrant has the professional responsibility and legal accountability for the supervised services.

8.8 Provision of services in sponsoring agency

Where a registrant offers psychological services or is directing the psychological services of others within a sponsoring institution and the registrant believes that the most appropriate service(s) to a client is not in accord with the expectations of the sponsoring institution, the supervising registrant must attempt to reconcile these differences with the administration of the institution in order to best respond to the client's needs.

11.13 Unqualified persons

A registrant must not promote the use of psychological assessment techniques by unqualified persons.

13.8 Supervisory records

A registrant must maintain records regarding the supervision of an individual for a minimum of seven years after the last date the registrant supervised that individual.

13.9 Content of supervisory records

A registrant must maintain records of supervised sessions that include, among other information, the type, place, and general content of the session.

15.5 Accuracy in training

When engaged in teaching or training, a registrant must present psychological information accurately and with a reasonable degree of objectivity.

15.6 Assessing students and supervisees

In academic and supervisory relationships, a registrant must establish an appropriate process for providing feedback to students and supervisees and inform them of same at the outset.

15.7 Basis for Assessment

A registrant must evaluate students and supervisees on the basis of his or her actual performance on relevant and established program requirements.

15.8 Prohibitions on training

A registrant must not teach the use of techniques or procedures that require licensure, including, but not limited to, hypnosis, biofeedback, and projective techniques, to individuals who lack the prerequisite training, legal scope of practice, or expertise to employ such techniques or procedures.

Definitions

“Formal Practica and Internships” means the structured supervised clinical training experiences that are standard requirements in psychology graduate programs.

“Designated Representative” means the person designated as coordinator or director of a practicum or internship. The Designated Representative will be a registrant, or an individual who is licensed, certified or registered to practice psychology in his or her jurisdiction. In some programs, the Designated Representative may be the Director of Clinical Training, whereas in other programs, the Designated Representative may be a faculty member who has been assigned to this role.

“Psychology Graduate Program” means a program in Professional Psychology (e.g. Clinical, Counselling, School or other applied practice area) that is intended to prepare students for the professional practice of psychology.

“Significant Concerns” means substantial issues relating to a supervisee’s fitness to practice psychology.

Advisory

- ***Training for students in psychology graduate programs***

Registrants who offer Formal Practica and Internships to students are responsible for confirming in writing with the Designated Representative of each student’s psychology graduate program that the student is eligible for specific practicum or internship training.

Registrants who are Designated Representatives are responsible for ensuring that a student is prepared and eligible for a community-based experience before confirming the student’s eligibility for a particular practicum or internship program.

Registrants who supervise students are ultimately responsible for ensuring that the student is specifically prepared for the psychological practice areas reflected in a particular practicum or internship.

Registrants providing supervision are responsible for the clients seen by students under their supervision, and for the quality and quantity of appropriate clinical supervision.

Registrants providing supervision are responsible for establishing an appropriate basis for evaluation of supervisees and an appropriate process for providing feedback.

If a registrant should develop a Significant Concern about a student whom the registrant is or may be supervising, the registrant should raise and document these concerns with the student and the Designated Representative of the psychology graduate program in which that student is enrolled, (or with the student and the director of the practicum or internship program in the event there is a director who is responsible for communicating with the Designated Representative).

Registrants may provide informal practice training experiences to students of psychology graduate programs (e.g., to allow them to gain supervised experience in working with a particular client group in a community setting). In such cases, the above-noted guidelines apply.

Registrants may not delegate the ultimate responsibility for a practicum or internship student to a non-registrant.

- ***Training not related to psychology graduate programs***

Registrants should carefully reflect on the appropriateness of supervision prior to providing formal or informal practica or internships to non-registrants who are not enrolled in psychology graduate programs.

In some circumstances, registrants may offer formal or informal practica or internships to non-registrants who are not enrolled in psychology graduate programs, but only if they have valid reasons for offering such formal or informal practica or internships outside of a psychology graduate program, and only after ensuring the individual(s) they are undertaking to train has (have) an appropriate background for that training.

In gathering background information about such situations, registrants should carefully inquire about any individual's previous graduate training in psychology. If an individual without graduate training in psychology seeks training and practice experience in mental health service competencies shared by various disciplines (e.g., crisis intervention, supportive counselling), a registrant should carefully review the individual's background training and experience to determine the most appropriate scope of training experience that is both feasible and consistent with the Code of Conduct.

- ***Supervision in Multidisciplinary/ Collaborative Care Settings***

Registrants who are in a supervisory role over non-registrants in a multidisciplinary/collaborative care setting are responsible for ensuring they offer only that training for which each non-registrant has the appropriate background training and experience. Registrants are also responsible for ensuring they have clarified their obligations as a supervisor with their employer, if any, and with those they are supervising, including any obligations for documenting supervision, providing feedback to supervisees, and ensuring that any and all psychological services offered under their supervision meet the requirements of the Code of Conduct. Registrants are reminded of their obligations under Standards **7.18** and **8.8** to address any conflicts between this Code and the regulations of the institution or organization within which they work, and of their obligation under Standard **7.11** to work cooperatively with other professionals in order to serve clients effectively.