

The proposed Psychotherapist Clinical Supervision Policy (page 12 of the PBANZ Scopes of Practice and Clinical Supervision Consultation Document) states that:

Psychotherapists registered in the Interim Psychotherapists Scope of Practice are expected to undertake clinical supervision which will normally be at least one hour every two weeks, regardless of caseload since it has a partial training function. New practitioners are expected to participate in weekly clinical supervision for the first two years of practice.

Psychotherapists registered in the Interim Psychotherapists Scope of Practice wanting to be registered in the Psychotherapist Scope of Practice **must** have clinical supervision from a psychotherapist registered in the Psychotherapist Scope of Practice. [Emphasis in the original]

Psychotherapists registered in the Interim Psychotherapists Scope of Practice wanting to be registered in the Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism **must** have clinical supervision from a psychotherapist registered in the Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism. [Emphasis in the original]

In essence this means that during a certain stage of training a psychotherapist **must** at least undertake supervision with a person registered in either a Psychotherapist Scope of Practice or a Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism. This portion of the new supervision policy does not make provision for an Interim Psychotherapist being solely supervised by practitioners from other clinical disciplines who are not registered in the Psychotherapist Scope of Practice or Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism.

Psychotherapy is not limited to any given health profession nor indeed is it even a restricted activity. Generally the Health Practitioners Competence Assurance Act 2003 effects regulation through the requirement that a health practitioner of a particular type must be registered as that type of practitioner in order to practise. Although certain activities may be restricted the practice of psychotherapy is not one of them. In fact the activity closest to psychotherapy which was previously restricted by the Act, specifically the restriction on: "Performing a psychosocial intervention with an expectation of treating a serious mental illness without the approval of a registered health practitioner" was removed as a restricted activity by Cabinet in December 2009 with effect from 14 January 2010.

Psychotherapy is legitimately practised by registered and unregistered health practitioners other than psychotherapists – in particular psychologists, psychiatrists, psychoanalysts, psychiatric nurses, social workers and clergy.

The number of people registered as psychotherapists in New Zealand is relatively small and therefore it is in the best interests of both the public and of the profession that the pool of registered health practitioner supervisors (for both training and maintenance of competence) be as large as possible.

Clinical Psychologists are highly trained registered health practitioners many of whom are skilled in psychotherapy. It is therefore advisable in the best interests of the public that they are able to play a role on a par with psychotherapists in the training of psychotherapists and in particular that they should be able to provide supervision to practitioners registered in either the Psychotherapist Scope of Practice or a Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism for training purposes.

It is therefore suggested that the portion of policy referred to above be amended to read:

Psychotherapists registered in the Interim Psychotherapists Scope of Practice are expected to undertake clinical supervision which will normally be at least one hour every two weeks, regardless of caseload since it has a partial training function. New practitioners are expected to participate in weekly clinical supervision for the first two years of practice.

Psychotherapists registered in the Interim Psychotherapists Scope of Practice wanting to be registered in the Psychotherapist Scope of Practice **must** have clinical supervision from either a psychotherapist registered in the Psychotherapist Scope of Practice or a health practitioner registered under the HPCAA and with a current APC, approved by the Board as having sufficient psychotherapy knowledge and skill.

Psychotherapists registered in the Interim Psychotherapists Scope of Practice wanting to be registered in the Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism **must** have clinical supervision from either a psychotherapist registered in the Psychotherapist Scope of Practice with Child and Adolescent Psychotherapist Specialism or a health practitioner registered under the HPCAA and with a current APC, approved by the Board as having sufficient psychotherapy knowledge and skill.