

# **USE OF WORKPLACE AND PAID PLACEMENTS IN POSTGRADUATE PSYCHOLOGY TRAINING: ISSUES AND RECOMMENDATIONS**

Affrica McCarthy (LaTrobe University)

Elizabeth Seeley-Wait (The University of Sydney)

John Baranoff (The University of Adelaide)

Karen Hendricks (Cairnmillar Institute)

Catharine McNab (Melbourne University)

Nicola Williams (Deakin University)

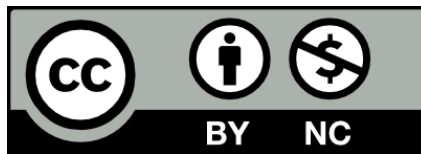
Chien Hoong Gooi (University of New South Wales)

of the

**AUSTRALIAN PSYCHOLOGY PLACEMENT ALLIANCE (APPA)**

**PLACEMENTS AND PAYMENTS WORKING GROUP (PPWG)**

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All correspondence regarding this document should be directed to  
the Co-Chairs of APPA-PPWG, Affrica McCarthy at [affrica.mccarthy@latrobe.edu.au](mailto:affrica.mccarthy@latrobe.edu.au)  
or Elizabeth Seeley-Wait at [elizabeth.seeley@sydney.edu.au](mailto:elizabeth.seeley@sydney.edu.au)

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## Background & Purpose

The Placement Coordinator role is central to any postgraduate psychology training program in Australia and is explicitly referred to in the APAC Evidence Guide (2023); especially in relation to ensuring that placement providers have “robust quality and safety policies and processes and meet all relevant regulations and standards” (criterion 1.4; APAC, 2023, p. 3) and that “placement supervision is sufficient to enable trainees to practice safely” (criterion 1.10; APAC, 2023, p. 5).

The evolution of training programs and the changes to accreditation standards has led to a growing need for programs to have processes in place to ensure that placement arrangements comply with accreditation standards. In addition to this, the placement landscape has become increasingly complex with the development of new placement types and opportunities resulting from collaborations between education institutions and placement partners. A development requiring consideration of the appropriate governance processes is the use of placements that remunerate trainees for their placement work, either using a trainee’s existing employment site as their placement site or a placement provider offering remuneration for work done by the trainee on placement.

Although payment for trainees on placement may offer both training opportunities and financial support, it also raises issues such as conflicts of interest that need to be carefully managed. To help placement coordinators consider and navigate the various compliance, training and ethical considerations when assessing the suitability of and managing these placements, the Australian Psychology Placement Alliance (APPA) convened the Placements and Payments Working Group (PPWG) to produce guidelines contained in this paper.

### Members of the Australian Psychology Placement Alliance Placements and Payments Working Group (APPA-PPWG)

The PPWG started with eight educators from APPA representing postgraduate psychology training programs in Master of Professional Psychology and Clinical Psychology. Although Areas of Practice Endorsement (AoPE) programs other than clinical were not represented in the working group, the general principles and recommendations outlined here are likely to be applicable to all APAC-accredited postgraduate psychology training programs in Australia. One member subsequently stepped down from their role in the OOWG which resulted in a group of seven working group members (all of whom are co-authors of this paper)

## Core Principles for Placements

Higher Education Providers (HEPs) and placement coordinators should consider several core principles when assessing the suitability of establishing a placement:

- The placement should offer an opportunity for new learning and the acquisition of relevant competencies;
- The placement should allow trainee competencies to be evaluated accurately;
- The placement should support ethical and professional practice, including enabling students and supervisors to practice with integrity, and within competencies, in ways that protect public safety. This includes identifying factors that may be barriers to ethical and professional practice within the placement (e.g., conflicts of interest) and addressing these;
- The placement should adhere to APAC standards, including sufficient supervision and diversity of relevant experience across placements.

## Scope of Recommendations

The scope of recommendations in this paper produced by the APPA-PPWG speaks to the management of a subset of placements in the context of the above core principles. This subset includes placements where there is some form of remuneration from the placement organisation to the trainee, and placements where there is a pre-existing or concurrent employment relationship between the placement organisation and the trainee. Some examples of such arrangements are provided below.

- The trainee has a pre-existing employment role in the placement organisation, and they continue to be employed in their usual role while using their employment work as their placement activity.
- The trainee has a newly established placement role that is concurrent and in addition to their existing employment role in the same organisation. Both the employment and placement roles can be paid, or the employment role is paid but the placement role is not. The scope and type of employment work undertaken may be similar or different to the placement work.
- The trainee is given remuneration for placement work carried out in the placement organisation (sometimes known as a paid placement). This is typically when the trainee has held no pre-existing (or concurrent) employment role in the placement organisation.

- The trainee is on placement with a placement organisation (without prior employment history) and is offered employment work during their course of placement. The employment work is done either as part of the trainee’s placement time or in addition to the trainee’s placement time.

For the purpose of this document, the abovementioned placements will be broadly termed “**workplace placements**” given the overlaps between remunerated work or employment (workplace) and practicum training associated with a postgraduate psychology program (placement).

Issues in relation to trainees undertaking work outside their training program (in addition to placements) and trainees continuing with paid work with the placement site after the end of placement are outside the scope of this paper.

## Issues to Consider around Workplace Placements

### Potential Conflicts

There are characteristic differences between placements and workplaces which can potentially give rise to conflicts and tensions in workplace placements. The key areas of potential conflict are associated with:

- The trainee’s role: There can be differing expectations of the trainee from the perspectives of the HEP versus the workplace. The trainee’s role, scope of work, and capabilities can each be seen differently by the two parties. This in turn can adversely impact the placement experience because the workplace placement may have expectations on trainees that are more relevant for an employee and not a trainee, while the HEP will have expectations that are relevant for a placement trainee.
- Likelihood of dual/multiple relationships: There is a possibility of overlapping relationships and roles between trainees, supervisors and/or the workplace placement provider. In this context, supervisors and providers are required to engage in the more complex task of supporting the trainee in two different roles, as employee and as trainee. Furthermore, this is often in the context of an existing or prior relationship that they have with the trainee as a peer or employee.

- Multiple agreements between parties: There are complexities with the introduction of an employment contract to the placement agreement between the HEP and the workplace placement provider, and also to the learning contract between the trainee and the HEP. This could result in a lack of clarity around who is involved when issues arise, who carries responsibility for the trainee’s experience across the different roles, and to whom trainees escalate concerns if there are issues with their training experience and/or their employment arrangements.

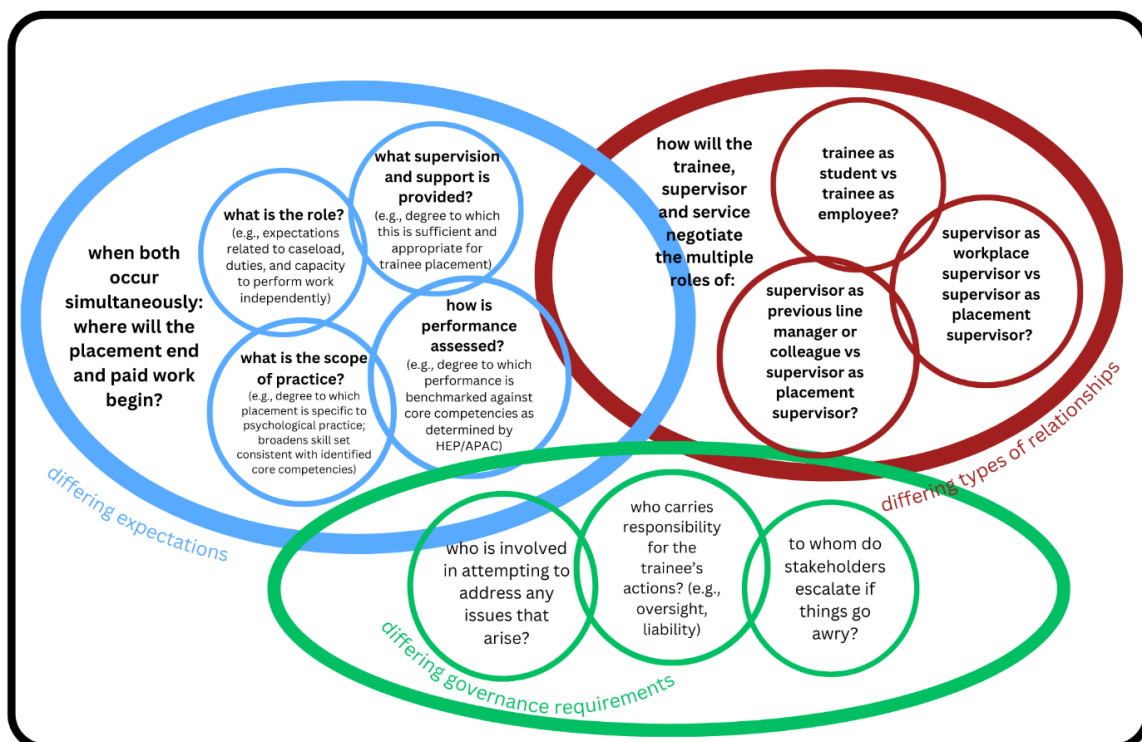
### Characteristic Differences

Figure 1 below summarises the three broad (interacting) areas where placements and employment may differ:

1. Differing expectations
2. Differing types of relationships
3. Differing governance requirements

The diagram also provides a different way of identifying potential conflicts and issues by having placement coordinators ask a series of questions in relation to any proposed workplace placements.

Figure 1: Questions to consider within a workplace placement setting



## Differing Expectations

### *Different role expectations*

Employees can be directed to do work as the employer sees fit (within the principles of relevant industrial relations legislation, e.g., Fair Work). On the other hand, the role of trainees on placement (regardless of whether or not they are paid in their trainee role) is to develop, with support from their supervisor(s) and placement site, the capabilities required to become a psychologist. What an employee can be expected to do in their role might differ from what an employer can reasonably expect of a trainee. It is important that the training experience is protected.

For example, the number of hours an employee works, including the number of clients seen by an employee per day, can be driven by the needs of the employer, while the number of clients seen by a trainee should be guided by principles of effective learning. This typically means that a trainee on placement engages in less direct client work than an employee. Similarly, while an employee may be directed to undertake more routine complex client work, a trainee will need to do this with more support (see below) and to a lesser extent than an employee, if at all.

### *Differing expectations regarding scope of practice*

Tasks undertaken within a trainee role on placement must comply with training requirements as indicated by regulatory bodies (e.g., TEQSA, APAC, AHPRA) and HEP policies. These requirements, that guide entry to the profession broadly, focus on experiences that provide trainees with the opportunity to develop competencies as psychologists. This can potentially be different from the employment context and issues may arise with respect to:

- Breadth and scope of work (e.g., while an employer may expect an employee to work with a specific focus, HEPs are likely to expect that trainees gain broader experience that is relevant to the core competencies of a psychologist).
- Type of work (e.g., while an employer may expect an employee to engage in a range of tasks that align with the needs of the workplace, HEPs will expect that trainees gain experience that is clearly linked to the core competencies of a psychologist).
- Opportunity for work that extends skills (e.g., while an employer may not be focused on developing particular skills in an employee, this is a core requirement of training, with the



trainee's particular learning goals being a foundational part of any placement agreement/contract).

### *Different expectations about support and supervision required*

Employees are often assumed to be relatively 'work ready'. On the other hand, trainees are explicitly still in training and should be assumed to require more support in terms of knowledge, skills, and socialisation to the profession.

Employee supervision is guided by AHPRA guidelines, and will differ between fully registered psychologists and provisional psychologists. However, trainee supervision is guided by APAC and HEP guidelines, which may be more stringent than those for provisional psychologists who are not enrolled in a higher education program (e.g., for those completing their internship year) and will always be more stringent than those for fully registered psychologists. Areas of difference may arise in:

- Definition as to what constitutes supervision
- Amount of supervision
- Extent to which supervision is offered in an individual versus group format
- The qualifications of the supervisor

The focus of supervision is also likely to differ across employees and trainees. The focus of employee supervision (this term is used broadly here to include psychology supervision and managerial supervision) can be guided by a myriad of factors including the needs of the employee, employee's learning plan, as well as organisational demands (e.g., key performance indicators [KPI]). However, supervision for trainees is a specific process within the definition of APAC, and must focus on supporting trainees to develop core competencies in their practice as psychologists. Trainee supervisors are also gatekeepers to entry to the profession, and as a result, supervision of trainees typically has a more overt evaluative component.

The stakeholders in supervision also differ between employees and trainees. The supervision relationship is between the supervisee and supervisor (and sometimes the service provider) in the case of employees. However, in trainee placements, the HEP (in the form of the placement coordinator) is also involved in the supervision relationship, often as a co-signatory to the placement contract. In this situation, the HEP has a direct relationship with the supervisor when the trainee is engaging in placement-related work, in a way that does not occur with an employee. As a result, the HEP, as a party to the placement contract, also needs to be informed about and approve material

changes to that contract by any other party (e.g., any planned or unplanned leave of a supervisor or trainee which prevents the trainee gaining sufficient supervision during that time period).

#### *Different understanding of competence*

The framework for assessing competence may also vary depending on whether an individual is deemed an employee or a trainee. As an employee, employers can assess competence in any way they see fit and in accordance with their relevant internal governance frameworks, and are likely to take into account factors such as KPI and organisational values. However, assessment of trainee competency is determined by pre-existing HEP frameworks, consistent with supporting trainees to reach the competencies outlined by APAC.

#### *Differing Types of Relationships*

When a trainee is also in a fiduciary relationship with a placement provider, this creates the possibility of a number of overlapping roles. These overlapping roles can have a range of impacts, including the following:

#### *Trainee as student versus trainee as employee*

If there are challenges in one role (e.g., trainee as employee), then this may impact the sustainability of the other role (e.g., trainee as student; or vice versa). For example, if there is a breakdown in the employment relationship, this threatens the sustainability of the placement, which may impact on trainee progress. Alternatively, if a trainee has concerns regarding the placement, this may threaten the sustainability of employment. This may limit the extent to which trainees feel confident in voicing challenges or other concerns, leaving them open to a range of adverse outcomes (e.g., exploitation, problematic training experience). While having separate supervision arrangements for the trainee's work and their placement is typically seen as a way of mitigating risks, there is still the risk of reduced containment and increased trainee anxiety if the different supervisors have competing expectations of the trainee.

#### *Supervisor as workplace supervisor versus supervisor as placement supervisor*

Even with the best of intentions, expectations regarding one role can affect expectations applied in another role.

Supervisors may inadvertently have inappropriately high expectations of a trainee because they are also an employee. For example, supervisors may evaluate trainees against the expectations they

would normally have of an employee, rather than expectations of a trainee. Going further, supervisors may allow concerns regarding the trainee's role as employee to affect their evaluation of the trainee as a trainee.

Alternatively, supervisors may judge sub-optimal trainee performance as competent in order to maintain the trainee as an employee and/or facilitate more timely graduation of the trainee. This may be particularly the case when the supervisor hopes to employ the trainee as a fully registered psychologist (or a psychologist with a specific AoPE). Additionally, supervisors may judge trainee performance as competent because they are competent in their work role, but overlook assessment of competence as measured by the HEP (and derived from the APAC standards).

#### *Supervisor as previous line manager or colleague versus supervisor as placement supervisor*

Supervisors who have pre-existing relationships with trainees may find it challenging to shift into the new role of placement supervision. For example, a supervisor who has formerly been a colleague needs to adopt a framework that includes support but also education and evaluation/gatekeeping, as they are now more formally tasked with determining the suitability of the supervisee's entry into the profession. Alternatively, supervisors may have had prior concerns about the supervisee's practice when the supervisee was an employee, and might (likely inadvertently) allow these concerns to adversely impact on the subsequent placement.

#### Differing Governance Requirements

In employment contexts, the contract of employment (to which the HEP is not a party) is likely to be the overarching legal framework, and associated with relevant agencies including Fair Work. However, standard trainee placements are governed by the:

- Placement contract, to which the HEP, the trainee, and the supervisor are parties, and which invokes the underpinning requirements of various regulatory and other bodies responsible for training, e.g., APAC, AHPRA, the HEP;
- Legal agreement or deed between the HEP and the placement provider (to which the trainee is not a party); and
- Learning contract between the trainee and the HEP (to which the placement provider is not a party).

Given the differences in governance and contractual requirements, there may be different principles related to the following issues, among others:

#### *Management of issues arising*

Employees usually seek advice from internal supports (e.g., manager, HR) around issues arising at work. When a trainee is on a workplace placement, the HEP becomes an additional party involved and should be informed of and involved in issues arising from the placement. This increases the inherent layers of communications for workplace placements compared to a standard workplace setting.

#### *Cover and responsibility for practice*

Employees are either covered by the workplace's insurance or must gain their own relevant insurance cover, while trainees on placement are typically covered by the HEP's relevant insurance policies. In the context of a workplace placement, it can be difficult to delineate between the responsibilities of each party if this is not clearly stipulated at the outset of the placement.

#### *Support if things go awry*

Trainees typically approach HEPs around issues arising from placements while employees approach their managers and can have recourse to independent advice (e.g., through union support) for workplace related concerns. When issues arise in a workplace placement, it can be unclear as to which party the trainee needs to escalate their concerns to (e.g., the trainee is not paid as agreed) and could take time to identify the appropriate channels of escalation. In addition, trainees could feel reluctant to escalate employment-based issues with the employer (which is also the placement provider) for fear of retribution or interruptions with their placement progress.

Given the involvement of additional and multiple parties in a workplace placement context, there are greater complexities involved in the management of such placements which can place a greater burden on all parties.

## Case Studies

The following cases further illustrate ways in which conflicts and issues might arise in a workplace placement context.

### Case Study A – Conflicts and Dual Relationships

Trainee A (TA) responded to an advertisement for a paid placement at a busy private practice. As part of the placement, the practice offered clinical supervision and the opportunity to work with children and adolescents, an area of competency TA had limited experience with to date. The placement coordinator approved the workplace placement but advised TA to carefully monitor their caseload to allow for adequate time to consolidate the new learning.

Shortly into the placement, the placement supervisor was expecting TA to see six clients per day, stating that they were “getting paid” in their role as an “employee”, and was expected to consider the financial needs of the practice as well as their placement needs. In response to the supervisor’s comments, TA agreed to see more clients than they were comfortable with. This led to TA having insufficient time to finish client-related activities, such as logbooks, session preparation, etc. TA ended up doing several hours overtime each week. As the placement progressed, TA felt increasingly overwhelmed and anxious with the complex nature of the work expected of them, as they had limited time in which to consolidate this new learning.

At the mid-placement review, the supervisor advised the placement coordinator that they were reluctant to recommend TA be given a pass for the placement due to how poorly TA coped with the placement and not having a “yes” attitude to new challenges. When asked to reference TA’s progress to specific clinical competencies in the Supervisor Report Form, the supervisor was unable to identify specific domains in which TA was not developing adequately and focused more on the lack of willingness to take on more clients.

Case Study A highlights:

- Conflict in the placement supervisor’s role as both supervisor (responsible for supporting learning needs) and employer (responsible for overseeing the financial outcomes of the business).
- Compromised independence of trainee evaluation by the workplace supervisor due to viewing performance through the business’s KPIs rather than based on clinical competency domains.

- Reluctance of trainee to raise difficulties with placement coordinator due to unclear expectations between their role as a trainee and employer.
- Issue around suitability of workload which could stretch beyond the trainee's competence and capacity to deliver appropriate care.

### Case Study B – Contractual Issues

Trainee B (TB) responded to an advertisement seeking provisional psychologists for placement opportunities within an organisational psychology setting. The interviewing psychologist mentioned that the role would be remunerated at a set daily rate, which appealed to TB as they had ongoing financial obligations.

On this understanding, TB suspended their usual paid employment in order to complete the placement. The HEP advised TB that any payment arrangements entered into were a matter for them and the placement provider to agree privately, and that the HEP is not a party to the employment/payment arrangements.

Four weeks into the placement, the placement coordinator received a distressed email from TB complaining that the workplace placement had still not yet paid them, despite saying multiple times that they would 'get around to it'. TB told the placement coordinator that nothing had been formalised in writing about their offer of remuneration. While TB considered this problematic, TB also said they were aware it was "just a placement, not a job", so did not want to "come across as pushy" by asking multiple times about remuneration.

TB requested that the HEP advocate for their interests with the placement provider, stating that they would not have accepted the placement offer if they were unable to be paid.

### Case Study B highlights:

- The complexities in managing multiple contractual agreements between the placement provider (employer), trainee and the HEP. In the above example, the HEP has been clear from the outset that any payment arrangements were to be agreed to between the trainee and the employer, and that the HEP will not be a party to such an agreement. However, when problems arise it is typical that the trainee would seek support from the HEP despite the HEP not being a party to the employment contract.

- Issues arising from the employer-employee relationship would impact on the placement relationship. In this instance, the workplace issue of payment (which does not directly involve placement and training competencies) would ultimately impact on the viability and willingness of the trainee to continue with the placement.

### Case Study C – Past Relationships

Trainee C (TC) was enrolled in a Masters of Clinical Psychology (post-registration), a bridging program designed for registered psychologists wishing to undertake AoPE training in clinical psychology. TC had been working full-time for five years at a community mental health service in a predominantly case management role with some occasional brief psychology-specific practice when their workload permitted. TC gained their employer's agreement to convert three of their five workdays to placement days, with the plan for these to be focused on psychology-specific activities. In contrast, the activities less relevant to their placement learning would be confined to their other working days.

The line manager appointed a Board-Approved Supervisor from the same team as TC to supervise TC. TC and the supervisor already had a close working relationship, having participated in peer group supervision together for three years and occasionally going out to work social functions together.

Four weeks into the placement, the service experienced a significant increase in new referrals. TC's line manager allocated TC new case management clients, some of whom would need to be seen on TC's negotiated placement days, resulting in reduced psychology-specific work. TC felt anxious about approaching their line manager about the difficulty this posed for their placement as TC did not wish to appear like they were not 'pulling their weight' with their team. TC also felt like their manager was doing TC a favour by allowing TC to use their employment hours as their placement.

TC's placement supervisor was aware of the time pressures on TC in trying to keep up with their case management workload and placement requirements, such that when TC was not keeping up with their placement assessments, TC's supervisor assured TC that she "knew them well" and "trusted" TC, so it was fine to submit this later.

At the mid-placement review, the issue of poor delineation between the placement role and work role was raised by the placement coordinator, in particular, in regards to whether TC was gaining sufficient opportunity to develop the clinical psychology competencies within the scope of their placement role.

It was also noted by the HEP that TC was behind with their logbook submissions and that their case reports were late.

TC's placement supervisor reassured the placement coordinator that TC was an exceptional clinician and marked TC on the Supervisor Report form as making "Excellent Progress". The supervisor acknowledged that the supervisor had not yet reviewed any of TC's case reports, seen up-to-date logbooks, or directly observed TC's case sessions but the supervisor "knew them very well" and could "vouch for their competency".

Case Study C highlights:

- Prior relationship between supervisor and trainee could compromise the independence of the supervisor's evaluation of trainee progress on placement.
- Poor delineation of placement role from work-role, despite efforts of the placement coordinator to emphasise the importance of this requirement to the trainee's learning, negatively impacting the trainee's capacities to develop AoPE-specific competencies.
- Power imbalance between the trainee and line manager compromising the trainee's capacity to advocate for placement learning needs (or to escalate issues to the placement coordinator).

#### Case Study D – Competing Priorities

Trainee D (TD) had presented some challenges to program administrators in the past and had been flagged as requiring further monitoring due to concerns about their levels of professionalism, including obvious inconsistencies in reporting in logbooks and expressing frustration to supervisors that TD felt undervalued because they were not being paid. After rejecting various placement options, TD found their own (unpaid) placement in a private practice where they were hoping to work after graduation.

Initially, both the placement provider and TD agreed to the standard HEP policies regarding placements, including consultation with, and seeking of approval from, the HEP should conditions of the placement need to be changed. However, at the mid placement review, it became apparent that the supervisor and TD had negotiated changes to the placement without discussing with and seeking approval from the placement coordinator. These included TD's placement being shortened, with TD instead commencing a paid role in the practice.



During the mid-placement review, TD noted that they were unprepared to accept not being paid for their work anymore. The placement provider commented on the workload of supervising TD, and so the need for provider to recoup some of their costs in this by ensuring TD 'generated more income' by seeing more clients.

Case Study D highlights:

- If there is a desire for a trainee to withhold information from their HEP, they may have more latitude to do this when the placement provider depends on them to stay/work for them.
- Conflict between appropriate arrangements for placement (e.g., appropriate supervision, scope of work, upholding of placement contract) and financial considerations (possibly from both the perspective of the trainee and the placement provider) can adversely impact the trainee's capacity to complete a placement that supports effective student learning.
- When the placement provider, supervisor and trainee do not fully appreciate the training and competency assessment roles of placements, the placement coordinator can be left as the only advocate for the trainee's development.

## Risk Management and Minimisation Processes

As highlighted in the previous section, there could be inherent issues arising from workplace placements due to a multitude of factors. Deciding on whether or not to include workplace placements as a possible choice for students will be dependent on the HEP. Although there is no guarantee for any placement to work well, and given the issues discussed, there may be more challenges in workplace placements. An important part of the prudent management of these placements is to set up the placement well, to have regular reviews during the course of the placement and for the placement coordinators to have enough resources to devote to these placements.

The following table provides a guide to tasks that placement coordinators could undertake in the important process of setting up a workplace placement (i.e., prior to approving the workplace placement). Given the amount of work and time involved in setting up such placements, it is important for trainees to apply for workplace placements with sufficient lead time and that placement coordinators are aware of the significant time required for setting them up.

The processes outlined in the table are not exhaustive and should be considered in addition to the standard due diligence undertaken in setting up any placement. It is also strongly recommended that placement coordinators consult their HEP's legal unit before proceeding with workplace placement arrangements.

It is important to note that despite best efforts and HEPs adhering to the recommendations outlined here, some risks associated with workplace placements (or any other types of placements) will remain. It is therefore important that HEP and placement coordinators have in place suitable processes to monitor, respond to and seek support around issues arising from placements.

Task #	Task	Details to Consider
1	Ensure clear communication with prospective placement provider around the differences in the role of a trainee and an employee.	<ul style="list-style-type: none"> <li>• Provide prospective placement provider with information outlining the differences between an employee and a trainee (as outlined in the above sections).</li> <li>• Read <a href="#">Protecting Trainees at Work</a>.</li> <li>• Identify and meet with all relevant stakeholders (e.g., trainee, supervisor, line manager, placement provider) to discuss placement arrangements.</li> <li>• Provide HEP competency framework to all relevant stakeholders.</li> <li>• Arrange for all relevant stakeholders to discuss and co-sign document outlining core principles that all stakeholders abide by in supporting trainee on placement. This includes references to: <ul style="list-style-type: none"> <li>▪ HEP supervision requirements</li> <li>▪ Number of direct client contact hours anticipated in any one placement day for a trainee at that level of training</li> <li>▪ Dedicated support to the trainee as part of the placement experience (that is different to that of an employer)</li> <li>▪ Ethical accountability for protection of the public referencing APAC Standards</li> <li>▪ Role of placement coordinator in overseeing adequacy of competency development within placement, including: <ul style="list-style-type: none"> <li>○ Capacity of placement coordinator to terminate placement arrangement if placement unable to meet required training needs and</li> <li>○ Competency development plan to be approved by placement coordinator</li> </ul> </li> </ul> </li> </ul>
2	Discuss with trainee the possible challenges that	<ul style="list-style-type: none"> <li>• Discuss potential difficulties (as noted in above sections) and how these can be addressed.</li> <li>• Where appropriate, explore advantages of completing placements in contexts other than those in which there is an alternative</li> </ul>

	<p>may arise when mixing their placement with a fiduciary relationship.</p>	<p>professional relationship (including diversity of supervision/clinical experience).</p> <ul style="list-style-type: none"> <li>• Assess trainee capacity for self-advocacy for managing difficulties in supervision relationship or with relationship with placement provider.</li> <li>• Clearly communicate (in writing) that: <ul style="list-style-type: none"> <li>▪ Clinical activities completed outside the scope of a placement contract (i.e., in an employment role) cannot be counted towards training hours</li> <li>▪ There are clear limits of responsibility of the placement coordinator/HEP around workplace issues (e.g., issues relating to payment).</li> <li>▪ The HEP may disendorse or terminate a placement if it is not meeting training requirements and that, in the case of a placement where the trainee is being paid for their placement, this will have an unavoidable financial consequence for the trainee; it may also have other financial consequences for the trainee if they have any other fiduciary relationship with the placement provider; this might also impact on the trainee’s rate of progression in their candidature.</li> <li>▪ This form of placement may have an impact on trainee preparedness to communicate concerns; and outline the importance of quality training experiences in career development and the possibility that issues raised early are more likely to be able to be addressed effectively.</li> </ul> </li> <li>• Meet with trainee to assess the degree to which they have understood and taken the above information into consideration and to acknowledge (in writing) of same. If placement coordinator is not clear this information has been understood or taken into account, delay process or seek alternative placement arrangement.</li> <li>• Where trainee has a pre-existing relationship with the supervisor or key staff members, have trainee complete a conflict-of-interest</li> </ul>
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		<p>form outlining the nature of existing relationships and ways to mitigate these conflicts.</p> <ul style="list-style-type: none"> <li>• Encourage trainee to take up membership of appropriate professional body to enable recourse if issues arise in the course of employment.</li> </ul>
3	<p>Assess capacity for placement provider to meet training needs for identified trainee</p>	<ul style="list-style-type: none"> <li>• Evaluate degree to which both trainee and HEP are able to monitor, throughout the placement, the degree to which the protected role of trainee is being maintained.</li> <li>• Assess degree to which placement providers and all other stakeholders appear aware of the protected role of trainee and are willing to support this as separate from employee.</li> <li>• Consider requesting and reviewing position description for trainee as employee.</li> <li>• Ensure inconsistencies between positions description and trainee requirements are discussed.</li> <li>• Discuss with Program Convenor or broader program staff to ensure that proposed placement arrangements are appropriate to meet trainee needs.</li> </ul>
4	<p>Ensure placement coordinator has sufficient resources to monitor the additional complexity of the workplace placement</p>	<ul style="list-style-type: none"> <li>• Assess whether requisite resources are available to undertake the additional requirements in setting up and monitoring of workplace placements. These include: <ul style="list-style-type: none"> <li>▪ Sufficient time (e.g., to undertake discussions with relevant stakeholders, arrange additional forms/paperwork, seek legal advice, closely monitor placement, deal with possible conflicts).</li> <li>▪ Support from other relevant staff of the HEP, (e.g., program director, HEP placements and legal teams).</li> </ul> </li> <li>• Refuse and/or terminate workplace placement arrangements if there are insufficient resources for placement coordinator to effectively discharge their duty of care and responsibilities.</li> </ul>

5	Construct the placement in a way that clearly delineates between the role of trainee and the role of employee, and includes risk mitigating processes.	<ul style="list-style-type: none"> <li>• Ensure that workplace placement facilitates separation of the roles of trainee and employee.</li> <li>• Ensure there are separate position descriptions for the placement and any other role/s with the placement provider.</li> <li>• Where possible, consider: <ul style="list-style-type: none"> <li>▪ Separation of paid work versus placement days</li> <li>▪ Minimal overlap between work and placement roles</li> <li>▪ Separation between line manager and placement supervisor roles; ideally with no reporting relationship between placement supervisor and line manager</li> <li>▪ Different client caseloads for different roles</li> <li>▪ Different email addresses for different communication</li> </ul> </li> <li>• Ensure leave entitlements and approval processes clearly stipulated at outset.</li> <li>• Ensure that differences in work roles across placement and other days are communicated with all relevant stakeholders in the placement provider (e.g., line managers, administration).</li> <li>• Document all placement arrangements above and have document co-signed by relevant stakeholders.</li> <li>• Outline responsibility of trainee and placement provider to inform HEP of any material changes to either employment or placement arrangements (e.g., number of days per week, clinical supervisor, line manager, number of clients expected to be seen, change in learning goals or KPIs).</li> <li>• Arrange additional check-ins with trainees and supervisors in workplace placement settings to enable early identification of issues.</li> </ul>
6	Ensure the relevant insurance coverage is clearly outlined and delineation of	<ul style="list-style-type: none"> <li>• Ensure that it is clear whether the placement provider or the HEP is providing insurance coverage, which may depend on whether the trainee is being paid for placement and, if not, whether a trainee is on a 'placement day' or a 'work day'.</li> <li>• Outline insurance arrangements in writing and co-sign as appropriate.</li> </ul>

	responsibilities clearly articulated	
7	Ensure lines of communication between the various parties are clearly articulated	<ul style="list-style-type: none"> <li>• Ensure clear lines of communication between various parties. For example, matters relating to the placement arrangement should involve the placement coordinator while matters relating to other fiduciary relationships with the placement provider should have different lines of communication (e.g., through line manager, placement provider HR).</li> <li>• Clearly articulate that employment contracts and arrangements are entered into between the trainee and the placement provider (without the involvement of the HEP) and hence any issues arising would need to be discussed directly between trainee and placement provider.</li> <li>• Outline lines of communication in writing and co-sign as appropriate.</li> </ul>
8	Clearly articulate processes for identifying, monitoring and responding to any arising issues	<ul style="list-style-type: none"> <li>• Arrange to conduct more frequent reviews (e.g., monthly) given that workplace placements typically require more intensive monitoring to address any arising issues early.</li> <li>• Clearly highlight HEP processes for responding to concerns about the placement experience, whether raised by placement providers/supervisors, trainees, or placement coordinators.</li> <li>• Outline expectation that reviews of placement would also involve review of non-placement employment relationship to ensure this not adversely affecting placement experience.</li> <li>• Encourage trainee to take up membership of appropriate professional body to enable recourse if issues arise in course of employment.</li> </ul>

During the course of the placement, regular reviews (more frequent than standard placements) should be conducted by the placement coordinator to ensure that:

- Conditions of agreements set out for the placement are adhered to by the various stakeholders.
- Placement arrangements remain viable, especially in the context of trainee competency development.
- Overlapping relationships are well managed in the placement.
- Trainee is comfortable in escalating issues to the relevant parties, especially around their learning needs.
- HEP and/or placement coordinator have been informed of any significant changes to the placement arrangements with revisions to the initial contracts/agreements as required.

## Conclusion

The decision to provide or approve workplace placements for trainees need to be based on numerous considerations. While such placements offer a direct benefit to trainees in terms of remuneration and convenience, there are potential issues that can arise due to the characteristic differences in the expectations, relationships and governance requirements around employment and placement contexts. These differences necessitate a careful set up of these placements whereby the expectations, relationships and governance requirements for the workplace placement are clearly articulated and delineated prior to the start of the placement. In addition, regular reviews of workplace placements would ensure timely identification and management of issues. Overall, workplace placements require additional time and resources to be properly managed and it would be prudent for HEPs that decide to approve workplace placements to ensure that placement coordinators are well supported in the implementation of workplace placements.

## References

Australian Psychology Accreditation Council. (2023). Australian Psychology Accreditation Council: Evidence Guide. Retrieved from [https://www.psychologycouncil.org.au/standards\\_review](https://www.psychologycouncil.org.au/standards_review)