



# Professional Supervision Policy

September 2017



FINANCIAL COUNSELLORS' ASSOCIATION  
OF WESTERN AUSTRALIA

# Contents

<b>ASIC Exemption and National Standards .....</b>	<b>3</b>
<b>What is Professional Supervision? .....</b>	<b>4</b>
<b>Types of Supervision .....</b>	<b>5</b>
<b>Group Supervision .....</b>	<b>5</b>
<b>Line supervision .....</b>	<b>5</b>
Why do we need Financial Counselling supervision? .....	5
<b>Methods of providing Professional Supervision.....</b>	<b>6</b>
Face to face.....	6
Telephone.....	6
Skype or FaceTime.....	6
Group supervision.....	6
<b>Required hours of supervision and frequency.....</b>	<b>7</b>
Hours required .....	7
Frequency .....	7
Aspects of the professional supervision session .....	7
<b>Requirements to be a Financial Counselling Supervisor .....</b>	<b>8</b>
Clarification - Three years' experience.....	8
Clarification - Another suitable qualification.....	8
<b>Supervision and Leave of Absence .....</b>	<b>8</b>
Leave of absence – Accredited members .....	8
<b>Supervision Training .....</b>	<b>8</b>
<b>Professional indemnity insurance for supervisors.....</b>	<b>9</b>
<b>Rights and responsibilities of supervisors / agencies and supervisees .....</b>	<b>9</b>
Supervisee:.....	9
Agencies .....	9
Supervisors.....	9
<b>Governance and compliance.....</b>	<b>9</b>
<b>Recommendations and Summary.....</b>	<b>10</b>
Appendix: 1 .....	11
National standards - Supervision applies to Associate members and full/ Accredited members.....	11
Requirement for Supervision .....	11
Requirements to be a Supervisor .....	11
Definition of Supervision.....	11
Supervision Agreement .....	12
Content and focus of supervision will be based on: .....	12
Making supervision work: what each agree to contribute.....	12

## Preamble

It has been identified by FCAWA that clarity around the requirements for supervision for Financial Counsellors has been one of the most challenging areas for employing agencies in WA. As the peak body for financial counselling in WA, we are committed to identifying and providing clarity around the requirements for supervision to ensure agencies comply with both the National Standards in Financial Counselling and the ASIC exemption from licensing. This policy applies to all Associate and Accredited members of the Association as part of their obligations to meet eligibility and membership to FCAWA.

## ASIC Exemption and National Standards

In relation to regulatory factors – supervision is one of the key compliance areas along with Continuing Professional Development (CPD) points in regard to the financial counselling industry Australia wide. Financial Counselling Australia (FCA) have outlined this in the National Standards (Appendix 1).

**The Australian Government, through the Australian Securities and Investment Commission (ASIC) within the Financial Services legislation has provided financial counselling with an exemption from licensing;**

*The Australian Securities and Investments Commission (ASIC) has granted conditional relief from the licensing requirements under the Corporations Act (the Act) to financial counselling agencies that may provide financial product advice as part of a financial counselling service.*

*ASIC Corporations (Financial Counselling Agencies) Instrument 2017/792*

*This relief is subject to further conditions including, that:*

- *Financial counsellors do not give advice to clients about purchasing investment products, such as shares or managed investments; and*
- *No fees or charges are paid by clients for any aspect of the financial counselling service; and*
- *The financial counselling agency is likewise unable to be remunerated (including by commission) directly or indirectly in relation to any action of the client; and*
- *The financial counselling agency does not operate or participate in a financial services business beyond the scope of this relief, and takes all reasonable steps to ensure that none of its employees do so.*

A financial counselling service is a counselling and advocacy service provided predominantly to assist individuals in financial difficulty because of such things as debt-over-commitment, unemployment, sickness or family breakdown. There are currently more than 150 financial counselling agencies operating across Australia, employing more than 500 financial counsellors. The agencies are funded variously by federal, state and, in some cases, local governments.

Financial counsellors predominantly advise clients about managing the consequences of debt, and in most cases clients of financial counsellors are not otherwise able to access commercial advisory services.

While credit is not part of the licensing regime under the Act, ASIC notes that a financial counsellor, may, in the course of assisting a client to manage their financial position, give advice about other regulated products, such as deposit accounts, personal insurance or superannuation.

This relief is made available so that financial counselling agencies are able to continue to offer full and independent counselling services to their clients under the new licensing regime, where the individual financial counsellors have adequate skills and knowledge to provide the service.

### The Employing Organisation

- Supervision helps the agency to fulfil its service responsibilities and obligations to consumers and to fulfil its responsibilities as an employer to guide and support its staff.
- *The relief is not intended to be available to any counselling, advocacy, information or education services which directly or indirectly charge clients for their services, or that otherwise do not meet the conditions of this relief.*

In order to obtain this relief, individual financial counsellors must also be members of, or be eligible to be members of, a recognised National or State Financial Counselling Association. Membership requirements themselves set standards about conflicts of interest and professional conduct

- Agencies receive the relief for not requiring a license, and it is therefore the agencies responsibility to ensure membership requirements of their financial counsellors are met.

# What is Professional Supervision?

Professional supervision supports the counsellor to develop skills and knowledge and provides an opportunity to reflect on and discuss case work issues and may also include personal issues that may be impacting on the financial counsellor's work. It provides a way for the financial counsellor to acquire competence needed to fulfil their professional responsibilities and is an important mechanism for maintaining a high-quality service to clients.

It is clear that for some financial counsellors it is difficult to obtain one on one financial counselling supervision. This includes, but is not restricted to, rural and remote financial counsellors who often work in isolation.

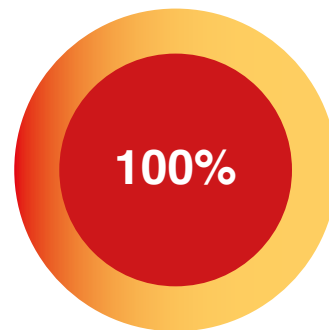
Therefore, we have looked at appropriate options for meeting the supervision criteria.

- 100% of all supervision hours (10 hours for a full time equivalent) with a financial counselling supervisor (see requirements to be a supervisor) Or;
- 50% of hours (5 hours per annum for a full time equivalent, 3 hours for a part time equivalent) with a financial counselling supervisor 50% can be made of;
  - o Group supervision
  - o Clinical supervision
  - o Line Management

Professional supervision can be made up of financial counselling supervision 100% (see under requirements to be a supervisor) or;

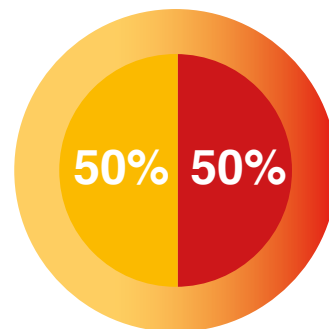
50% financial counselling supervision and then other supervision either line management / clinical or group supervision.

## Optimum Supervision Requirements



■ Face to Face  
1 to 1

## Minimum Supervision Requirements



■ Line Management, Group Supervision, and / or Clinical Supervision

■ Face to Face  
1 to 1

## Types of Supervision

### Group Supervision

Group supervision is when a group of financial counsellors, facilitated by an appropriately trained and recognised Financial Counselling supervisor, meet for the purpose of supervision. This session may include issues of self-care and boundaries, debriefing and support, general counselling and ethical issues, as well as presentation and discussion of cases.

**Please note: The nominated supervisor needs to be clearly identified in the group. The supervisor must sign the supervision sheet. The supervisor can not record this as their own supervision.**

### Line supervision

If a line supervisor is also the financial counselling supervisor it is imperative to keep the two roles separate. This can be helped by: using the supervision template, or differentiating the separate part of supervision. It could also be suggested that some of the hours required could be gained through group supervision or by sourcing an outside supervisor to keep line management issues outside of the supervision process for financial counselling supervision.

Supervision helps another to learn from their experience in the workplace. The focus is on practise, including the financial counsellors' wellbeing and skill development, with the goal of achieving the best outcomes for the client.

Responsibility for time management, administration duties and communication in the organisation is a management supervisory role and not the FCAWA approved supervisors' responsibility.

### Clinical supervision

This will be with a specialised service that has qualified psychologists and or counsellors.

## Why do we need Financial Counselling supervision?

Working in stressful environment has a deleterious effect on the well-being of any worker. Workers who are unhappy or stressed is not effectual, both for the worker or the client.

The accountability and work of a supervisor cannot be overlooked and is to ensure that the counsellor is providing a service which is consistent ethical and effective for all concerned. If this is done properly then the employing agency will be protected.

It is intended as a process to support workers in financial counselling organisations to provide a better, more confident and creative services to clients. In this case, the primary focus is the *actual doing* of the work and how workers can extend themselves in relation to their practice.

Though definitions of professional supervision for financial counsellors vary, the principle goals and outcomes are consistent and can be summarised as follows through 4 main components:

(This is not an exhaustive list but put there for ideas.)

**\*The basis for professional supervision- (information provided from FCRC)**

### The consumer / client

Supervision helps to protect the rights and legitimate interests of what is recognised as a highly vulnerable group. Supervision helps to promote effective and high-quality service through;

- discussions to look for a better option for clients
- workshop client cases to discuss options strategies and actions may have valid alternatives for a more desirable outcome for a client.
- ensure that services to clients is safe, ethical and competent

## The Financial Counsellor

Supervision helps to provide knowledge skills and professional development for the worker to do his/ her work competently/ Supervision should also be a source of encouragement and support to the worker through;

- the opportunity to enhance existing skills and technical knowledge and develop knowledge for new skills
- providing assistance with ongoing professional development, enhancement of skills knowledge and ethics of supervisee
- to provide support and act as a mentor.
- to provide a reflective space and emotional support, and an opportunity for reflection and direction.

## Methods of providing Professional Supervision.

FCAWA recognises the uniqueness in the environment in which many of our financial counsellors are practicing. Nearly half of our financial counsellors work outside the metropolitan areas. Many work in agencies with only one financial counsellor, therefore there is a need to be creative and give support to those financial counsellors and agencies who may not find it easy to locate a supervisor.

With this in mind FCAWA supports a number of flexible and different ways of receiving supervision.

### Face to face

One to one - face to face supervision. This is standard professional supervision incorporating the definitions and goals of this policy

### Telephone

It is recognised that due to remoteness, time, travelling costs, face to face supervision may not be a practicable option. Under these circumstances a well conducted telephone supervision, incorporating the definition, goals and functions of supervision as in these guidelines may be a reasonable alternative.

- **FCAWA Guide Note**

- \* This will be deemed as the same as one to one supervision.

### Skype or FaceTime.

This will be deemed the same as one to one supervision .

### Group supervision

This can be a group of financial counsellors facilitated by an approved Financial Counselling Supervisor (see requirements). This is particularly useful for financial counsellors working in nearby areas with a short supply of eligible supervisors.

- **FCAWA Guide Note**

- \* Up to half of your required number of hours of supervision can be this type of supervision

## Required hours of supervision and frequency

The National Standards currently outline the minimum number of hours required per year. Some states have more than the minimum hours.

### Hours required

The number of hours of professional supervision required per year is based on the number of hours worked per week by the financial counsellor.

For financial counsellors working 20 hours per week or more – a minimum of 10 hours per annum, per membership year (July to June) is required.

For financial counsellors working 20 hours or less per week, a minimum of 6 hours per annum, per membership year (July to June) is required.

### Frequency

Ideally and where possible - once per month for full time workers and once every two months for part time, allowing for leave.

## Aspects of the professional supervision session

The essential feature is the relationship between supervisor and supervisee that is a two-way relationship that allows for the cycle of experience, reflection analysis and action to occur in a respectful and confidential manner.

The supervision session it is suggested that:

- Free from interruptions
- Have a Specific dedicated time
- Planned supervision
- An agenda where possible
- Confidentiality and privacy ensured
- Supervisor / supervisee contract (see attachment)
- A written record

FCAWA will develop detailed guidelines for Supervisors after agreement on this policy

# Requirements to be a Financial Counselling Supervisor

The minimum eligibility requirements for a financial counselling supervisor are

**(a) Accredited members of FCAWA and**

- Practising financial counsellors with a minimum of 3 years' experience and
- Completed an approved FCAWA course and
- Make an application to FCAWA which then recognises you as an approved supervisor or

**(b) Another suitable qualification / person as approved by a state or territory financial counselling association.**

**Clarification - Three years' experience**

In addition to the National Standards FCAWA require a person to have been working as an accredited financial counsellor for 3 years full time. This means that from the time they have achieved their diploma they then need to have completed for three years full time work as a financial counsellor.

FCAWA will formalise the process of supervisor approval by sending a letter **and certificate** to the applying supervisor after receipt and acceptance of application.

**Clarification - Another suitable qualification**

We know how difficult it can be to obtain supervision especially in remote and regional areas. To this end;

FCAWA will authorise senior solicitors to provide supervision in such cases where it isn't possible to receive financial counselling supervision through accredited members who obtain supervisor status. FCAWA will formalise this recognition in writing when information is provided on the solicitor's name and qualification.

## Example

Janet is an associate member working in a remote agency in the North West full time.

Janet has access to a senior solicitor from a regional town who works for a community legal centre.

The solicitor travels to her agency quarterly to meet with clients.

Janet gets 4 hours (40%) of her supervision from the solicitor.

She also has supervision from her line manager bi monthly- 6 hours – 50%

She joins group supervision via teleconference with other financial counsellors when the opportunity arises, possibly twice a year for an hour- 2 hour – 20%

**If Janet has formalised with FCAWA for her solicitor to be a supervisor (as per the policy) then Janet meets the requirements under the FCAWA supervision policy. The above scenario leaves Janet with some flexibility if circumstances change and to allow for leave etc.**

## Supervision and Leave of Absence

### Leave of absence – Accredited members

**FCAWA will endorse those on LOA who were supervisors previously, to continue if other membership requirements supervision requirements are met.**

## Supervision Training by FCAWA

**FCAWA Supervision Training will be held annually at no cost to members. All potential supervisors must attend this training and then, at a minimum every three years, they need to repeat the training.**

Note: A Financial Counsellor can access other supervisor training, at their own cost, as long as it is FCAWA approved.



## Professional indemnity insurance for supervisors

This has been a challenge for many agencies regarding who is liable for the insurance if their financial counsellors supervises outside of the employing agency.

**Professional Indemnity insurance is the responsibility of the agency that employs the supervisor.**

*Note: If a supervisor acts in this role, in their own hours (away from the agency that employs them) or sets up in a private business, they are responsible for their own Professional Indemnity Insurance.*

## Rights and responsibilities of supervisors / agencies and supervisees

For appropriate supervision to occur there needs to be responsibility from all concerned.

### Supervisee:

- It is the responsibility of the supervisee to find an appropriate supervisor.
- Ensure supervision requirements are met for membership.
- Work with the supervisor to enable the best type of supervision when face to face is not available and negotiate times suitable to both.
- Use FCAWA supervision agreements/ or similar alternatives, and record time date and length of each session and maintain records that may need to be followed up and submit form along with membership renewal.

### Agencies

- Support your supervisor to take on supervision outside of your agency where possible.
- Ensure your professional indemnity insurance is adequate to cover financial counsellors, (supervisors and students where applicable).

### Supervisors

- If planning to supervise outside of agency ensures agency approval and professional indemnity is sourced.
- Ensure confidentiality for the supervisee unless harm could be inflicted to self or others, then the supervisor has a duty of care to act.
- Both the supervisee and supervisor to keep records of supervision.

## Governance and compliance

- FCAWA will appoint an executive committee member and the compliance officer to oversee a grievance procedure for supervision from members.
- FCAWA will investigate supervision complaints and applications for special consideration
- FCAWA will maintain that Accredited and Associate membership is reliant upon the supervision requirements being met
- FCAWA may complete a random audit of member's applications

## Recommendations and Summary

There is no doubt that good supervision for those working in stressful and emotional environments can have very positive outcomes not only for the counsellor but also for the agency concerned. The accountability of the supervisor is to ensure that a financial counsellor is providing a service which is consistent ethical and effective for all concerned and ultimately the employing agency will be protected.

The need to develop a more comprehensive and nationally recognised training program is currently being developed to improve the knowledge and support of financial counselling supervisors. However, there are many out there who are doing a good job who are highly qualified and highly effective.

FCAWA wants to work with agencies, supervisors, financial counsellors and all concerned to get supervision in the forefront of everyone mind and embrace the concept.

**Regulatory requirements in the ASIC exemption also state that:**

***In order to obtain this relief, individual financial counsellors must also be members of, or be eligible to be members of, a recognised National or State Financial Counselling Association. Membership requirements themselves set standards about conflicts of interest and professional conduct***

ASIC Corporations (Financial Counselling Agencies)  
Instrument 2017/792

The National Standards act as a starting point, FCAWA in working with agencies have added clarification around some of the points discussed, we ask agencies to support their financial counsellors to obtain their supervision, and make their supervisors available to other financial counsellors in other agencies wherever possible.

1. FCAWA are aiming for a structured policy around the issue of supervision and will be working with FCA at a national level to achieve this as well. We also require the approval and support of agency managers and financial counsellors to own the policy and work with FCAWA in working with us to resolve discrepancies and to inform us.
2. FCAWA expects that from 1 December 2017 members will be compliant with the policy.
3. FCAWA will continue to work on further guidelines for supervisor's.
4. FCAWA will provide supervision training annually.
5. FCAWA will participate in consultations with respect to supervision and the national standards.



# Appendix: 1

## National standards - Supervision applies to Associate members and full/ Accredited members

### Requirement for Supervision

If working as a financial counsellor:

- Employed 0.5 FTE or more – minimum of 10 hours per membership year; or
- Employed less than 0.5 FTE – minimum 6 hours per membership year.

### Requirements to be a Supervisor

To be a financial counselling supervisor a person must hold the Diploma of Community Services (Financial Counselling) and have:

- Three years FTE financial counselling experience OR
- Another suitable qualification, as approved by a State or Territory financial counselling association.
- A supervisor must also have completed a suitable course in professional supervision acceptable to their State or Territory association.

### Definition of Supervision

Professional supervision supports the work of a financial counsellor. The supervision process provides a forum to discuss casework, clinical aspects of the role and the counsellor's emotional and psychological wellbeing.

Professional supervision is an equal relationship founded on mutual trust and respect.

- Whereas Line management supervision is a different process to professional supervision.

### Supervision Agreement

This form is to be completed at the beginning of the supervision process. It identifies what the financial counsellor and supervisor want and will contribute to the supervision process. It provides a chance to discuss any difficulties that may arise.

Content and focus of supervision will be based on:

- Reviewing your work via discussion, reports, observations
- Agreeing and monitoring action plans
- Development of your skills, knowledge and value base by reflecting on your performance
- Identifying your development needs, interests, goals and action plans
- Providing space for you to reflect more generally on your experience of, and feelings about your work

## Making supervision work: what each agree to contribute

The financial counsellor (Supervisee):

What I want from you as my supervisor:

.....  
.....

What I will contribute as the Supervisee to make this work:

.....  
.....

### **The FCAWA Supervisor:**

What I want from you as a supervisee:

.....  
.....

What I will contribute to make this work:

.....  
.....

### **To consider together:**

What we will do if there are difficulties working together:

.....  
.....

Other comments:

.....  
.....

This agreement to be reviewed at (frequency) .....

Name of Supervisor: .....

Signature of Supervisor .....

Date: .....

Name of Supervisee: .....

Signature of Supervisee: .....

Date: .....

## Membership Compliance Policy

As per the Constitution, this Policy covers members who do not comply with membership requirements and sets out the procedure to be followed for non-compliance and the appeals process.

### **Refusal of Applications for Membership (in accordance with the Constitution)**

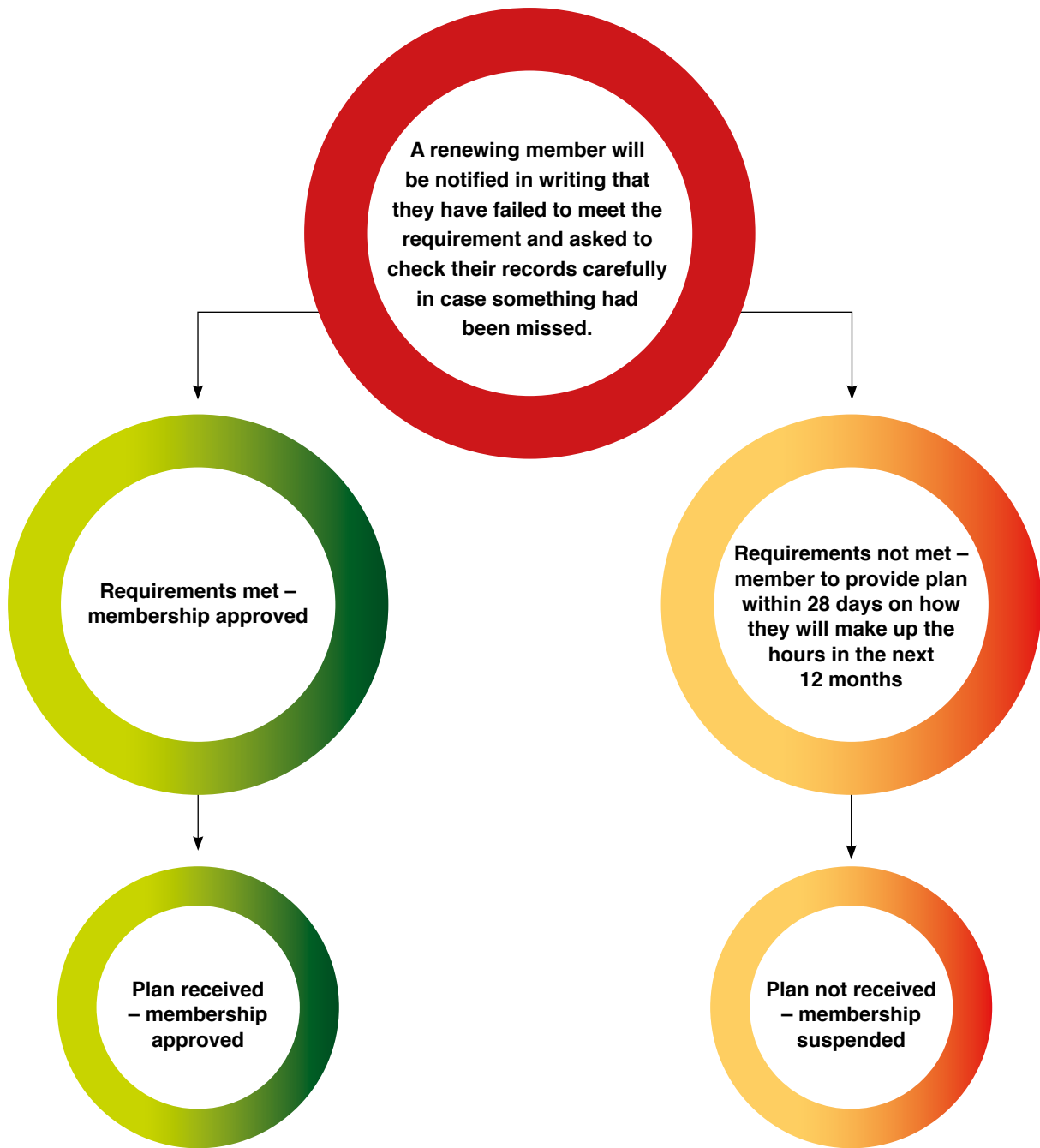
1. A person whose application for membership has been refused will have any fees paid by that person refunded and will not be eligible to apply again for membership within three months from the date of refusal.
2. A person, to whom a notice of refusal of membership is given, either wholly or for a particular category of membership, may appeal in accordance with the Constitution.

## Policy for Non-Compliance

If a renewing member fails to meet the required amount of Professional Development and or Supervision for their level of membership the following procedure will apply:

1. Renewing member will be notified in writing that they have failed to meet the requirement and asked to check their records carefully in case something had been missed.
2. If requirements are not met, the member will be asked to provide a written plan on how they can make up those Professional Development points and supervision hours over the next 12 months to the Membership Secretary within 28 days.
3. If the member fails to submit their plan within the required 28 days as per their membership may be suspended. The process for this will be described in the organisations constitution.

# Compliance Flow Chart



## Appendix- Compliance

If the member fails to meet their membership requirements and complete their plan within the 12 month period, their membership may be suspended





**FINANCIAL COUNSELLORS' ASSOCIATION**  
OF WESTERN AUSTRALIA

**A:** 3 Moore Street, East Perth WA 6004

**P:** 9325 1617

**E:** [admin@financialcounsellors.org](mailto:admin@financialcounsellors.org)

**W:** [www.financialcounsellors.org](http://www.financialcounsellors.org)