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Training Supervisor Approval Policy

Metanoia Institute

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Related policies
• Dual Relationships Policy • Conflict of Interest Policy • Fitness to Practise Policy • Safeguarding Policy • Data Protection Policy • Records Retention and Disposal Policy • Student Code of Conduct • Complaints Policy • Academic Regulations
External references
• UK Council for Psychotherapy (UKCP), Standards of Education and Training • UKCP, Code of Ethics and Professional Practice • British Association for Counselling and Psychotherapy (BACP), Ethical Framework for the Counselling Professions • BACP, course accreditation requirements and guidance • Equality Act 2010 • Data Protection Act 2018 and UK General Data Protection Regulation

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Training Supervisor Approval Policy

1. Policy statement

Metanoia Institute is committed to ensuring that training clinical supervision is safe, ethical, professionally independent and aligned with the requirements of each programme and its relevant professional, statutory and regulatory bodies.

The Institute will approve only those training supervisors who are appropriately qualified and experienced, meet the programme's modality-specific and professional requirements, and are able to maintain clear boundaries and exercise independent professional judgement. Actual, potential and perceived conflicts of interest will be identified, declared, assessed and managed before approval is granted and throughout the period of approval.

2. Purpose

This policy establishes a consistent and auditable framework for the approval of training clinical supervisors and for the identification, assessment and management of conflicts of interest. It aims to ensure that:

- supervisory relationships maintain professional integrity, independence and fairness;
- students are protected from inappropriate power imbalances, dual relationships and divided loyalties;
- supervisors understand and support the requirements, learning outcomes and professional standards of the student's programme;
- approval decisions are proportionate, transparent, equitable and appropriately recorded; and
- Metanoia Institute meets relevant UKCP and BACP standards and its wider legal and regulatory responsibilities.

This policy operates in conjunction with the Institute's Dual Relationships Policy and the related policies listed in the version-control section.

3. Scope

This policy applies to the approval and continued approval of all training clinical supervisors who supervise Metanoia Institute students as part of an Institute programme, including:

- external supervisors in independent practice;
- current members of Institute staff who undertake supervision outside their substantive role;
- former members of Institute staff;
- supervisors employed by, teaching at, or otherwise affiliated with other training providers or organisations; and
- supervisors proposed by a student, placement provider or programme team.

It applies to all programmes where clinical supervision forms part of the student's training, placement, professional development or assessment requirements. It does not replace any additional modality-specific, programme-specific or professional-body requirements.

4. Definitions

Training clinical supervisor: A suitably qualified and experienced practitioner approved by the Institute to provide clinical supervision that contributes to a student's training and professional development.

Conflict of interest: A situation in which a supervisor's professional judgement may be, or may reasonably be perceived to be, compromised by another role, relationship, duty, interest or loyalty.

Actual conflict: A conflict that currently exists and is directly affecting, or is capable of affecting, the supervisory relationship or approval decision.

Potential conflict: A conflict that may arise because of foreseeable changes in roles, relationships or circumstances.

Perceived conflict: A situation in which a reasonable person could conclude that the supervisor's objectivity or independence might be compromised, even where no actual conflict has occurred.

Dual relationship: A situation in which the supervisor and student have, or have had, another professional, academic, therapeutic, personal, familial, social, financial or business relationship in addition to the supervisory relationship.

5. Policy principles

- Training supervision must maintain clear professional boundaries and prioritise student welfare, client safety and the integrity of the training.
- Supervisors must be able to exercise independent professional judgement and provide honest, appropriately challenging and developmentally useful feedback.
- Teaching, assessment, progression, fitness-to-practise and supervisory roles must be separated where combining them would create a material power imbalance or conflict.
- All relevant personal, professional, academic, institutional and financial relationships must be declared openly before approval and whenever circumstances change.
- Approval decisions will distinguish between actual, potential and perceived conflicts and will be based on the nature, likelihood and impact of the risk.
- Where a conflict can be managed safely and proportionately, approval may be granted subject to clear conditions, monitoring and review.
- Where a conflict cannot be managed adequately, the supervisor will not be approved, or approval will be withdrawn.
- Approval decisions will not be used to prevent lawful professional disagreement, critical reflection or academic debate. However, supervisors must not use their position to undermine the student's ability to meet the requirements of their Metanoia Institute programme.
- Decisions will be made fairly, consistently and without unlawful discrimination.

6. Conflict-of-interest risk categories

6.1 Current Institute academic staff

A current member of academic staff must not supervise a student where they teach, assess, examine, evaluate, make progression decisions about, or participate in fitness-to-practise decisions concerning that student.

A current member of staff may be considered to supervise a student on an unrelated programme where there is no direct or indirect academic, evaluative, managerial or progression role. Such cases require declaration and case-by-case risk assessment.

The principal risks associated with combining academic and supervisory roles are that the student may withhold clinically important material, assessment integrity may be compromised, and the power imbalance may inhibit openness or challenge.

6.2 Former Institute staff

Former members of staff may be approved where they continue to demonstrate appropriate professionalism, competence and constructive engagement with the Institute's current requirements. Approval will consider:

- the nature and circumstances of their departure, insofar as relevant to professional suitability or risk;
- evidence of ongoing professional standing and conduct;
- their understanding of the current curriculum, standards, assessment processes and programme expectations;

- their ability to represent the modality, training and Institute accurately and constructively;
- their capacity to maintain appropriate boundaries and separate any previous role or dispute from the present supervisory role; and
- the likely impact of the proposed arrangement on the student's experience and progression.

The central consideration is whether the individual can work professionally, constructively and accountably within the Institute as it currently operates.

6.3 Supervisors linked to other training providers

Employment by, teaching at, or affiliation with another training provider does not automatically prevent approval. The Institute will consider whether the affiliation creates divided institutional loyalties, a material financial or reputational interest, or a risk to programme integrity.

Programme integrity may be at risk where a supervisor promotes an alternative curriculum, training route or institutional interest in a way that creates confusion, conflicts with the student's programme requirements, destabilises the training relationship or undermines the student's successful progression.

Individuals who hold a senior leadership, ownership or significant commercial role in a directly competing institution will not normally be approved. Tutors and practitioners working across different settings may be approved following a proportionate risk assessment and, where necessary, conditions.

6.4 Personal, therapeutic, financial or prior relationships

The following relationships must be declared:

- a current or previous therapy relationship;
- a close personal, family or social relationship;
- a current or previous financial or business relationship;
- a current line-management or employment relationship;
- a previous supervisory relationship where this may affect objectivity or create dependency; and
- any other relationship that could reasonably be perceived to affect independence or student welfare.

A current or previous therapist-client relationship, close personal or family relationship, or significant financial or business relationship will normally result in non-approval. Exceptional cases require a documented rationale showing why the risk can be managed safely and why an alternative supervisor is not reasonably available.

6.5 Professional conduct and suitability

Supervisors must disclose any current or previous complaints, disciplinary findings, professional-body sanctions, restrictions on practice, safeguarding concerns or other matters relevant to the supervisory role. Disclosure will not automatically result in non-approval; the Institute will consider relevance, seriousness, recency, remediation, current professional standing and risk.

7. Approval process

7.1 Application and declaration

The proposed supervisor must provide the information required by the relevant programme and complete the Training Supervisor Conflict of Interest Declaration at Appendix B. The Institute may also require evidence of professional registration, qualifications, supervision training, insurance, continuing professional development and experience.

7.2 Initial screening

The Head of Programme, or an appropriately delegated programme lead, will screen the application for:

- teaching, assessment, progression or fitness-to-practise overlap;
- personal, therapeutic, financial or business relationships;
- institutional or competitor affiliations;
- previous concerns or restrictions relevant to the role;
- compliance with programme and professional-body requirements; and
- any incomplete, unclear or inconsistent information.

7.3 Risk assessment

Where a conflict or concern is identified, a structured assessment will consider:

- the nature and degree of any power imbalance;
- the supervisor's actual and perceived objectivity;
- the likelihood that the student may withhold material or feel unable to challenge the supervisor;
- alignment with the programme's current requirements and standards;
- client, student, programme and reputational risk;
- the availability and effectiveness of safeguards; and
- the impact on the student's experience, progression and equality of opportunity.

7.4 Clarification conversation

The Head of Programme may hold a clarification conversation with the proposed supervisor and, where appropriate, the student. This will normally be used for former staff, cross-institutional affiliations, incomplete declarations or other complex cases. The conversation must remain focused on relevant professional risks and safeguards.

7.5 Decision

The decision will be one of the following:

- Approved: no material conflict or concern has been identified.
- Approved with conditions: identified risks can be managed through specified safeguards and review arrangements.
- Not approved: the conflict or concern is incompatible with safe, independent and effective training supervision, or required information has not been provided.

The decision-maker must give a clear, proportionate rationale. Approval is specific to the relevant programme and student arrangement and must not be assumed to apply automatically to other programmes or students.

7.6 Recording and communication

The decision, rationale, risk level and any conditions must be recorded securely. The supervisor and student will be informed of the outcome and of any conditions relevant to them. Information about third parties or confidential employment matters will be shared only where necessary and lawful.

8. Conditions of approval

Conditions must be specific, proportionate, time-limited where appropriate and capable of being monitored. They may include:

- no involvement with the student's teaching, assessment, progression or fitness-to-practise processes;
- no contact with specified members of the teaching or assessment team except through agreed channels;
- confirmation that the supervisor will work to the current programme handbook and supervision requirements;
- additional reporting or review points;
- completion of Institute briefing, induction or continuing professional development;

- review after a specified period or following any change in role or affiliation; and
- immediate re-declaration if circumstances change.

Failure to comply with a condition may result in suspension or withdrawal of approval.

9. Ongoing monitoring

- Supervisors must re-declare relevant interests at least annually and whenever circumstances change.
- Programme teams will review supervisor suitability through routine student feedback, placement and supervision monitoring, professional-body checks and any concerns raised.
- Approval may be reviewed at any time where new information, a complaint, a change of role, a professional conduct matter or a significant concern arises.
- Where approval is suspended or withdrawn, the programme team will support the student to secure an alternative arrangement and will consider any impact on clients and progression.

10. Responsibilities

10.1 Supervisors

- provide complete and accurate information;
- declare actual, potential and perceived conflicts promptly;
- maintain clear professional boundaries and confidentiality;
- work within the relevant programme, modality and professional requirements;
- comply with any conditions of approval; and
- inform the Institute immediately of changes to registration, practice status, employment, affiliations or professional conduct matters.

10.2 Students

- provide accurate information about any prior or current relationship with the proposed supervisor;
- raise concerns promptly through the programme or relevant Institute procedure; and
- comply with programme requirements for selecting and changing supervisors.

10.3 Heads of Programme and delegated programme leads

- ensure the policy and programme-specific criteria are applied consistently;
- conduct or oversee screening, risk assessment and clarification conversations;
- make or authorise approval decisions within the agreed scheme of delegation;
- ensure decisions and conditions are documented and reviewed; and
- seek advice from senior academic, clinical, safeguarding, People and Culture or data-protection colleagues where required.

10.4 Director of Education

The Director of Education has oversight of the consistent application of this policy across programmes and may review complex, disputed or high-risk decisions.

11. Records, confidentiality and data protection

Information collected under this policy will be limited to what is relevant and necessary for approval, risk management and regulatory assurance. Records will be stored securely, accessed only by those with a legitimate need, retained in accordance with the Institute's Records Retention and Disposal Policy, and processed in line with the Data Protection Policy, the Data Protection Act 2018 and UK GDPR.

The Institute will not seek or record unnecessary details about a former employee’s departure, a complaint or a third party. Where sensitive information is relevant, the decision record should state the risk and rationale without including excessive personal detail.

12. Appeals and concerns

A proposed supervisor or student may request a review of a decision where they believe that relevant information was not considered, the policy was applied incorrectly, or the decision was procedurally unfair. A review request should be made in writing to the Director of Education within 10 working days of notification of the decision.

The review will be undertaken by a person who was not the original decision-maker. The review may confirm, vary or overturn the decision. It does not replace the Institute’s Complaints Policy where a wider complaint is being raised.

Concerns about an approved supervisor’s conduct, boundaries, competence or conflicts should be reported promptly to the Head of Programme and managed under the relevant Institute policy or procedure.

13. Monitoring and review

The Director of Education is responsible for monitoring the effectiveness and consistency of this policy. The policy will be reviewed every two years, or earlier where required by changes to legislation, professional-body standards, regulatory expectations or Institute structures.

Appendix A: Decision pathway

Stage	Action
1. Proposal	A supervisor is proposed by the student, programme or placement.
2. Declaration	The supervisor completes the required application and conflict-of-interest declaration.
3. Initial screening	The Head of Programme checks academic overlap, personal or therapeutic relationships, institutional affiliations, prior concerns and programme eligibility.
4. No material concern identified	The supervisor may be approved, subject to completion of standard programme checks.
5. Concern or conflict identified	A structured risk assessment is completed, considering power, objectivity, alignment, student experience, client safety and reputational risk.
6. Clarification	A clarification conversation is held where information is incomplete or the risk is complex.
7. Decision	The outcome is Approved, Approved with Conditions, or Not Approved.
8. Record and communicate	The decision, rationale, conditions and review date are recorded securely and communicated appropriately.
9. Monitor	Annual re-declaration and ongoing review apply throughout the approval period.

Appendix B: Training Supervisor Conflict of Interest Declaration

Section 1: Personal details

Name: ____

Professional registration body: ____

Registration number: ____

Contact details: ____

Section 2: Relationship to the student

Do you have, or have you previously had, any of the following relationships with the student?

☐ Current or previous therapist

☐ Personal or social relationship

☐ Family connection

☐ Previous supervisory relationship

☐ Financial or business relationship

☐ Line-management or employment relationship

☐ None of the above

If yes, please provide relevant details:

____

____

Section 3: Relationship to Metanoia Institute

Are you currently employed or engaged by the Institute? ☐ Yes ☐ No

Have you previously been employed or engaged by the Institute? ☐ Yes ☐ No

If yes, please state dates and role:

____

Section 4: Teaching, assessment and decision-making roles

Are you currently teaching on the student's programme? ☐ Yes ☐ No

Are you currently assessing or examining the student? ☐ Yes ☐ No

Are you currently involved in progression decisions concerning the student? ☐ Yes ☐ No

Are you currently involved in fitness-to-practise decisions concerning the student? ☐ Yes ☐ No

Are you currently managing or line-managing the student? ☐ Yes ☐ No

If yes, please provide details:

____

Section 5: Other institutional affiliations

Do you teach at another training provider? ☐ Yes ☐ No

Do you hold a leadership, governance or ownership role in another training provider? ☐ Yes ☐ No

Do you have a significant financial or commercial interest in another training provider? ☐ Yes ☐ No

If yes, please provide details:

____

Section 6: Professional conduct and practice status

Are you currently subject to, or have you previously been subject to, any complaint, disciplinary action, professional-body sanction, restriction on practice or other concern relevant to this role? ☐ Yes ☐ No

If yes, please provide relevant details, including outcome and current status:

____

____

Section 7: Declaration

I confirm that:

☐ I have disclosed all relevant relationships, interests and circumstances;

☐ the information provided is complete and accurate to the best of my knowledge;

☐ I have read and will comply with the Institute's Training Supervisor Approval Policy and Dual Relationships Policy; and

☐ I will inform the Institute promptly of any change that may affect my approval.

Signature: __________________________________ Date: ____________________

Name: ______________________________________

Appendix C: Decision criteria and risk assessment record

C1. Current Institute academic staff

Risk level	Criteria	Indicative outcome
High	Direct teaching, assessment, examination, progression, fitness-to-practise or line-management relationship	Not approved
Medium	Member of Institute staff with no direct role, but some indirect influence or programme connection	Case-by-case assessment with safeguards
Low	No teaching, assessment, progression, management or other influence over the student	May be approved

C2. Former staff

Risk factor	Considerations
Nature of departure	Whether any circumstances are relevant to current professional suitability, boundaries or risk.
Professional conduct since leaving	Evidence of constructive, ethical and professionally accountable practice.
Alignment	Understanding of and ability to work with the Institute's current training model and standards.
Capacity for boundaries	Ability to separate previous roles, relationships or disputes from the present role.
Impact on the student	Whether the arrangement is likely to be containing and developmental or confusing and destabilising.

C3. Affiliation with another training provider

Risk level	Criteria	Indicative outcome
High	Senior leadership, governance, ownership or substantial commercial interest in a directly competing provider, creating an unmanageable conflict	Not normally approved
Medium	Teaching, consultancy or other affiliation with another provider	Case-by-case assessment with safeguards
Low	Independent practitioner without a material institutional or financial conflict	Usually acceptable

C4. Institute risk assessment and decision record

Student name and programme: ____

Proposed supervisor: ____

Decision-maker: ____

Date of assessment: ____

Risk factors considered:

☐ Academic or evaluative overlap

☐ Power imbalance

☐ Personal, therapeutic, financial or business relationship

☐ Institutional or commercial conflict

☐ Professional conduct or practice-status concern

☐ Programme alignment

☐ Impact on student experience and progression

☐ Client safety or safeguarding

☐ Reputational or regulatory risk

☐ Other

Overall risk level: ☐ Low ☐ Medium ☐ High

Decision: ☐ Approved ☐ Approved with Conditions ☐ Not Approved

Rationale:

____

____

____

Conditions and review arrangements, where applicable:

____

____

Authorising name and role: ____

Signature: ________________________________ Date: __________________