



Practice Notes

The Many Sides to Supervision

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Practice Notes is an educational tool designed to help Ontario social workers, social service workers, supervisees, students, employers and members of the public gain a better understanding of recurring issues dealt with by the College's Professional Practice Department and Complaints Committee that may affect everyday practice. The notes offer general guidance only and College registrants with specific practice inquiries should consult the College, since the relevant standards and appropriate course of action will vary depending on the situation.

The Professional Practice Department receives numerous requests for consultation regarding supervision. This is unsurprising as supervision is an essential component of professional practice throughout a registrant's career. Although the need for supervision does not end after a certain period in practice, supervision evolves and may look different depending on where a registrant is in their career, their practice setting or the client group being served. Registrants' inquiries about supervision reveal that it is a multifaceted process with different dimensions that must be considered.

When discussing supervision, it is important to note that supervisees are clients – to whom registrants have professional responsibilities.¹ Additionally, it is necessary to understand the difference between consultation and supervision. For the purposes of these Practice Notes, a supervisee is considered a client whenever a registrant provides a formal supervisory service, including where the supervisee is a professional from another discipline, provided the registrant is competent to provide that service and the work being supervised falls within the registrant's scope of practice.

Supervision² is a formal process, one in which the supervisor takes notes and stores them in accordance with the Standards of Practice. A supervisee is a client, as they are "provided with either direct or indirect professional services, as detailed in the Scopes of Practice."³ As a client, supervisees must be informed by the supervisor of the limits of confidentiality and that information may be shared with and by a supervisor where the circumstances require disclosure (for example, mandatory reporting). In addition, clients of the supervisee must be informed about the limits of confidentiality. It is also important to note that it is an act of professional misconduct to provide inadequate supervision.⁴

Consultation⁵ is a less formal process. An example is having a conversation with a colleague to assist in gathering resources and discussing ideas that can be used to support a client. No identifying information or names are shared during a consultation. It is an informal process of discussing client supports or resources where client information is kept confidential by the registrant seeking advice or guidance. The individual with whom the registrant consults is not in a position of authority and is not held accountable for the guidance they offer. On the other hand, supervision is a formal process that is required throughout a registrant's career. During supervision sessions, the supervisee discusses their client's private information with their supervisor, and the supervisee is considered a client.

Registrants should also note that other regulatory bodies may have different definitions for consultation and supervision than the College. If registrants are looking to engage in consultation or supervision with an individual registered with another regulatory body, they should ensure that they understand the definitions used by that particular regulatory body.

Lastly, it is important to understand the differences between group supervision and peer or group consultation. Group supervision is a form of supervision where a supervisor supports a group of supervisees, under the definition of supervision. A group of peers providing consultation, support and advice to each other, while often called group or peer supervision, is considered consultation and not supervision – meaning that client information must be kept confidential.

For additional information, registrants may want to read the [Practice Notes: Supervision At the Core of Competent and Ethical Practice](#) or watch the [Webinar: Supervision: The Cornerstone of Competence](#). The [Practice Guidelines for Performing the Controlled Act of Psychotherapy](#) also contain a chapter on supervision.

Scenario 1 – Supervision Outside the Scope of Practice

Registrants have contacted the Professional Practice Department to share that they have received cold calls from individuals who state they are lactation consultants and to ask if the registrant can supervise them for billing purposes. These registrants consulted the College to gain clarification because they did not feel that lactation consultation was part of their scope of practice and were confused by the request.

Lactation consulting is not part of the social work⁶ or social service work⁷ scopes of practice. It would therefore not be appropriate for a registrant to supervise a lactation consultant, as they would not have the requisite skills, knowledge and judgment to advise the individual. If a lactation consultant invoiced their client indicating that a registrant was their supervisor, an insurance company could (and has) called the College to confirm whether lactation consultation services are in the social work or social service work scopes of practice. When the insurance company discovers that lactation consulting is not part of a registrant's scope of practice, they could (and have) determined that a registrant has committed insurance fraud.

There are times when registrants can provide

supervision services to other professionals. In these situations, the professionals bill their clients while indicating that a College registrant is their supervisor. The clients can then submit the bill for these services through their employee benefits programs. This is called [third-party billing](#).⁸ Registrants can only provide supervision services to other professionals if they have competence in the other professional's role, function and client group, and the work of the other professional falls under the registrant's scope of practice. Examples of professionals who may use third-party billing include, but aren't limited to:

- Child and Youth Workers
- Disability Support Workers
- Community Support Workers
- Addiction Counsellors

As discussed in previous [Practice Notes](#)⁹, some professions **do not** fall within the College's scopes of practice and may not be used for third-party billing, including, but not limited to:

- Sleep consultants
- Wellness or other coaches
- Doulas
- Trauma-informed yoga instructors
- Early Childhood Education instructors

In addition to the factors discussed above, registrants must ensure they are [competent](#)¹⁰ to provide supervision, as this is a specific skill set that requires honing and training. Most importantly, registrants must consider whether providing supervision to other professionals for third-party billing is being done in the client's best interests – to remove barriers and increase access to insured services. As the first interpretation in the Code of Ethics states, "[a] College registrant maintains the best interest of the client as the primary

¹Ontario College of Social Workers and Social Service Workers (OCSWSSW), *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Glossary, "Client."

²OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Glossary, "Supervision."

³OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Glossary, "Client."

⁴Professional Misconduct Regulation, O Reg 384/00, e-Laws, <https://www.ontario.ca/laws/regulation/000384>.

⁵OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Glossary, "Consultation."

⁶OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Scope of Practice for Social Work.

⁷OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Scope of Practice for Social Service Work.

⁸Betteridge, Lise. "Practice Notes: The Question of Third-Party Billing." *Perspective*, Spring 2015. https://www.ocswssw.org/wp-content/uploads/PN-The_Question_of_Third-Party_Billing.pdf

⁹"Practice Notes: Are You Practicing in Scope?" *Perspective*, Spring 2025. https://www.ocswssw.org/wp-content/uploads/PN-Are_You_Practising_In_Scope-EN.pdf

¹⁰Betteridge, Lise. "Practice Notes: But How Do I Know if I'm Competent – Issues to Consider." *Perspective*, Fall 2013. https://www.ocswssw.org/wp-content/uploads/PN-How_Do_I_Know.pdf

professional obligation.¹¹ If a registrant were to engage in third-party billing with the primary motivation to increase their business and revenue, this would not be in the client's best interest and would create a conflict of interest.¹²

Scenario 2

The Professional Practice Department was contacted by a registrant who specializes in a specific modality and who was asked to provide supervision to a social worker in another province. The registrant stated that the supervisee was an Ontario resident who was living temporarily in another province, and they would meet virtually to discuss the supervisee's clients and the application of the treatment modality.

As supervision is a professional service, and a supervisee is a client, the registrant was informed that they would need to contact the regulatory body where the supervisee was located to determine the regulatory requirements in that [jurisdiction](#). The fact that the supervisee was an Ontario resident was irrelevant; service occurs where the client is located.

Some regulatory bodies may require registration to provide supervision services to a registrant in their jurisdiction, even if supervision is provided virtually. It is important to note that the College cannot authorize registrants to practise anywhere but Ontario. Additionally, while professional liability insurance is not a College requirement, registrants providing supervision services are strongly encouraged to have appropriate coverage. The registrant was advised to contact their professional liability insurance to ensure they are covered to practise in other jurisdictions, including virtual practice. They were also encouraged to obtain a legal consultation to determine if there are any legislative requirements they should know about before providing services in the other jurisdiction. In addition to the jurisdictional issues, registrants should always be mindful of their obligation to provide adequate supervision to a supervisee, and whether they can do so in virtual or distance context. As previously noted, it is an act of misconduct to fail to provide adequate supervision.

Another factor to consider is whether the registrant will be supervising someone who is performing the controlled act of psychotherapy. The regulation of

the controlled act of psychotherapy differs across jurisdictions. In some areas, psychotherapy is not regulated and is not a controlled act. Additionally, in some jurisdictions, the controlled act of psychotherapy is not regulated by the social work regulatory body, and registrants will have to consult with another regulatory body to determine if they are permitted to provide this service. If a registrant is considering providing supervision for someone performing the controlled act of psychotherapy who is located in another jurisdiction, the registrant will likely need to contact more than one regulatory body.

Another complexity with cross-jurisdictional supervision depends on whether the supervisee is a social service worker. Ontario is one of the few jurisdictions in Canada that regulates social service workers. While the potential supervisor must take the same steps and contact the regulatory body where the social service worker supervisee is located to determine the requirements in that jurisdiction, the response on how to navigate this practice will vary.

Registrants considering providing supervision in other jurisdictions should consider:

- What are the regulatory requirements of providing supervision services to someone in another jurisdiction?
- Does the registrant have professional liability insurance and does it cover practising in another jurisdiction?
- Are there other laws the registrant should be familiar with when practising in another jurisdiction, such as mandatory reporting obligations?
- Is the registrant knowledgeable of resources in the other jurisdiction, and can they adequately and ethically assist with crisis management of the supervisees' clients in that jurisdiction?
- Is psychotherapy a controlled act in the jurisdiction, and if so, who regulates this practice?
- Is social service work regulated in the jurisdiction, and if not, what are the implications of providing supervision?

Scenario 3

A registrant contacted the Professional Practice Department to inquire about finding a supervisor. The registrant will be performing the controlled act of psychotherapy and was curious who they could receive supervision from. The registrant also asked if the College had a list or any recommendations of where they could find a supervisor. They also wanted to know if supervision services were HST-exempt.

The registrant was informed they could receive supervision for the controlled act of psychotherapy by a regulated professional who:

- Is competent in the provision of supervision and in performing the controlled act;
- Who understands the registrant's scope of practice; and
- Who is a registrant in good standing in one of the [six regulatory bodies](#) that are authorized to perform the controlled act of psychotherapy in Ontario.

The registrant then asked if they could receive supervision from a social worker in another province. They were directed to information on the College website about how social workers in other provinces can apply to [practise electronically in Ontario](#).

The registrant was informed that the College does not make recommendations or keep a roster of supervisors. It was suggested that the registrant contact their professional association to see if they could provide guidance in this area. The registrant was also encouraged to reach out through their professional networks for suggestions and to explore online therapy information sites where professionals advertise their services, such as Psychology Today, to review the profiles of providers who offer supervision services.

Lastly, it was explained to the registrant that as the regulatory body for social workers and social service workers, the College cannot give tax advice. Registrants should obtain advice from an accountant, lawyer and/or the Canada Revenue Agency HST Rulings Department at 1-800-959-8287.

Conclusion

Registrants must remember, "[t]he need for supervision does not end after a certain period in practice but evolves and continues throughout a [registrant's] career."¹³ When a registrant is starting their career or changing roles, client groups or practice settings, they will require more frequent and formal supervision. As a registrant progresses in their practice, their supervision needs may change, and they may seek out different forms of check-in and consultation, with ad hoc formal supervision always available. Whatever the case, "College registrants shall engage in the ongoing process of self-reflection and evaluation of their practice and shall seek supervision and consultation when appropriate."¹⁴

Additionally, registrants must remember there is a difference between formal supervision and peer consultation. While peer consultation is important for numerous reasons, it is not a substitute for formal supervision. Also, a supervisee meets the definition of a client, and a supervisor must provide safe, ethical and competent service within the supervisory relationship.

There are many different elements to consider when providing or seeking supervision. An effective supervisor is competent in providing supervision, understands their own and their supervisee's scope of practice, as well as the regulatory and policy implications which may limit or impact practice. Finally, recognizing that supervision is a career-long professional obligation supports safe and competent practice and demonstrates care and accountability to clients.

If you have questions about supervision, please contact the Professional Practice Department at practice@ocswssw.org.

¹¹OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Code of Ethics, interpretation 1.

¹²OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Glossary, "Conflict of Interest."

¹³OCSWSSW, *The Practice Guidelines for Performing the Controlled Act of Psychotherapy*, 2017.

¹⁴OCSWSSW, *The Code of Ethics and Standards of Practice Handbook, Third Edition, 2023*, Principle II: Competence and Integrity, interpretation 2.1.8.