# **Research and Reflections on Dual Relationships in Counselor Supervision**

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# **Research and Reflections on Dual Relationships in Counselor Supervision**

The concept of a dual relationship in counseling has been defined by many researchers in a variety of ways (Baca, 2011; Borders & Brown, 2005; Deng et al., 2016; Jackson, 2007; Moleski & Kiselica, 2005; Syme, 2006). The fundamental characteristic of a dual relationship is that one person assumes two or more roles in a connection with another person (Jackson, 2007; Moleski & Kiselica, 2005; Syme, 2006). Dual relationships vary and are commonplace in non-Western cultures and in many professions such as with beauticians and physicians (Syme, 2006). In counseling, dual relationships may exist between a counselor and a client, a counselor and a counselor-in-training (CIT), or two counselors participating in peer supervision (Bernard & Goodyear, 2014; Mills & Swift, 2015). Of note, researchers and professionals are beginning to use boundary issues, nonprofessional relationships, and inappropriate relationships to refer to dual relationships (Cottone, 2010; Goodrich, 2008; Jackson, 2007). However, for the purposes of this paper, the term dual relationship will be used throughout. To better understand dual relationships in counseling supervision, this following discourse seeks to define the

topic, investigate it in terms of sexual and non-sexual relations, explicate available guidelines and best-practices, identify areas for future research, and pose reflections on dual relationships confronted through the author's experience with peer supervision.

### **Defining Dual Relationship**

According to Barnett and Molzon (2014), a dual relationship exists when a person has a primary professional relationship and a secondary relationship with another person. Bernard and Goodyear (2014) further explain that a dual relationship is a relationship between two people in which two or more social roles exist. Dual relationships may include social, business, financial, or family relationships (Barnett & Molzon, 2014; Moleski & Kiselica, 2005). Moleski and Kiselica (2005) also report that dual relationships may be sexual or nonsexual in nature, include current or former clients, may be intentional or accidental, and may help or harm the counseling or supervisory relationship. Baca (2011) further explains that characteristics of dual relationships may include giving or accepting gifts, verbal and/or physical abuse, neglect, or romantic or sexual relationships. One feature of a dual relationship in counseling that most people are unaware of is that the dyad may

occur while the counseling or supervisory relationship is active, or it may be a promise to have a non-counseling or nonsupervisory relationship in the future (Deng et al., 2016; Moleski & Kiselica, 2005). Sexual Dual Relationships in Counseling Supervision

### **Sexual dual relationships between**

a supervisor and a supervisee are considered to be exploitative, unethical, and sometimes abusive (Barnett & Molzon, 2014; Bernard & Goodyear, 2014). Even though some supervisees feel that they enter into consensual sexual relationships with their supervisors, this is essentially impossible as supervisors hold overt and covert power over their supervisees that cannot be negated (Bernard & Goodyear, 2014; Jackson, 2007; Kozlowski, Pruitt, DeWalt, & Knox, 2014). Sexual dual relationships may include overt sexual contact such as kissing, fondling, or sexual intercourse, or covert sexual contact such as sexual gazes (Moleski & Kiselica, 2005). Research has shown that sexual dual relationships correlate with negative consequences for supervisees including quilt, low self-esteem, fearfulness, depression, increased risk of suicide, and confusion (Jackson, 2007; Moleski & Kiselica, 2005; Syme, 2006). In addition to the harm that a supervisee may incur, a sexual relationship between a supervisor and a supervisee often leads to subjectivity from the supervisor and damage to the program's reputation (Jackson, 2007). Most counselors, researchers, and counseling associations agree that sexual dual relationships are always problematic and must be avoided (Deng et al., 2016; Jackson, 2007; Moleski & Kiselica, 2005; Syme, 2006).

# **Non-Sexual Dual Relationships in Counseling Supervision**

Aside from a sexual dual relationship between supervisors and supervisees. Borders and Brown (2005) espouse that there are two additional types of relationships that may exist: 1) social and/ or 2) therapeutic.

### Social dual relationships in counseling supervision. Borders

and Brown (2005) claim that social dual relationships in counseling supervision are practically unavoidable. For instance, a supervisor may serve as a supervisee's teacher, advisor, employer, role model. mentor, co-author, research partner, or friend (Barnett & Molzon, 2014; Bernard & Goodyear, 2014; Borders & Brown, 2005; Jackson, 2007). According to Barnett and Molzon (2014), supervisors and supervisees frequently attend conferences or professional meetings together and work on projects together including research and presentations. Additionally, supervisees in a study conducted by Kozlowski et al. (2014) reported having the following social interactions with their supervisors; having a meal or alcoholic drink together, visiting the supervisor's home, receiving a gift from the supervisor, and listening to a supervisor complain about a client. Other examples of social dual relationships between supervisors and supervisees include attending one's celebration, such as a graduation or wedding, or meeting one's family members (Kozlowski et al., 2014).

Many researchers believe that social dual relationships can be beneficial to supervisees (Barnett & Molzon, 2014: Bernard & Goodyear, 2014; Kreider, 2014). The reported benefits include convenience. increased opportunities for the supervisee, and better oversight throughout the

supervisory relationship (Barnett & Molzon, 2014; Bernard & Goodyear, 2014; Kreider, 2014). This benefit is promising as some dual relationships are unavoidable. especially in small or rural communities, small counselor education programs, and the military (Barnett & Molzon, 2014; Deng et al., 2016; Gonyea, Wright, & Earl-Kulkosky, 2014; Kozlowski et al., 2014; Moleski & Kiselica, 2005; Paulson, Casile, & Jones, 2015). Yet, while social dual relationships may be beneficial, any dual relationship must be evaluated for its potential impact regardless of whether the relationship is by choice or by chance (Moleski & Kiselica, 2005). According to Bernard and Goodyear (2014), dual relationships are problematic when the power difference between two people puts the person with less power (the supervisee) at a disadvantage or at risk for harm, or when the person with more power (the supervisor) is unable to remain objective.

# **Therapeutic dual relationships in** counseling supervision. Sometimes,

supervisors transition from supervising their supervisees to counseling their supervisees (Barnett & Molzon, 2014). This issue of a therapeutic dual relationship is rather common and understandably so as supervisees disclose personal and professional issues during supervision (Borders & Brown, 2005). Both Barnett and Molzon (2014) and Borders and Brown (2005) agree that supervisors who find themselves entering into a therapeutic dual relationship with a supervisee must refer that supervisee to another professional for therapeutic assistance as it is inappropriate for supervisors to counsel their supervisee because this dynamic may blur the lines of objectivity in the relationship.

# **Dual Relationships in Group Training** Supervision

Dual relationships may exist between a supervisor and supervisee in group training, as this is often part of counseling supervision (Goodrich, 2008). An example of a dual relationship in group training is when the group's facilitator also serves as a professor for at least one member of the group (Goodrich, 2008). This becomes problematic as group members may be weary of disclosing personal information in front of their professor (Goodrich, 2008). As Goodrich (2008) explains, group training allows students to better understand group norms and processes as well as the role of the group facilitator. While dual relationships in group training are problematic, they do not eliminate the need for group training. It is important to discuss these issues and identify solutions so that group training can successfully occur. For instance, one potential solution to calm students' fears pertaining to self-disclosure in front of their professor is to allow students to complete role plays instead (Goodrich, 2008). It is also important for professors to receive training regarding this dual relationship so that they do not abuse their ability to evaluate students in this situation (Goodrich, 2008).

## **Dual Relationships in Peer** Supervision

According to Mills and Swift (2015), peer supervision is a practical way to address the supervision that most counselors desire yet do not receive. Peer supervision helps counselors develop or expand skills, facilitates a means to share with colleagues, and enables counselors to feel supported by and provide support to colleagues (Mills & Swift, 2015). Specific skills that can be developed through peer supervision include consultation skills,

critical thinking skills, problem solving skills, ethical decision-making skills, and reflective skills (Mills & Swift, 2015). Dual relationships in peer supervision become problematic when one counselor fears breach of confidentiality or senses a power differential outside of peer supervision, or when counselors who are not participating in peer supervision feel left out (Mills & Swift, 2015). By nature of peer supervision, a dual relationship is nearly unavoidable as those participating in the relationship almost always know each other in another setting. Notably, the existence of a dual relationship in peer supervision does not automatically damage the effectiveness of peer supervision. As Mills and Swift (2015) suggest, it is important for those participating in peer supervision to discuss potential dual relationship conflicts at the onset of the supervisory relationship and throughout the experience.

#### **Boundaries**

According to Syme (2006), some people feel that bans on dual relationships are outdated and culturally insensitive. However, Baca (2011) explains that professional boundaries, including those pertaining to dual relationships, protect professionals, clients, and counselors-intraining. It is important for each counseling participant to be aware of the potential impact of dual relationships because the most egregious infractions usually begin innocently but escalate to a point of destruction (Baca, 2011).

Bleiberg and Baron (2004) and Kozlowski et al. (2014) explain that boundaries exist in supervisory relationships just as they do in nearly all relationships. Supervisory boundaries define what is and is not appropriate in a supervisory relationship (Kozlowski et al., 2014). When a boundary crossing occurs, the incident may or may not present an unethical infraction (Kozlowski et al., 2014). For instance, a supervisor who accepts a gift from his or her supervisee because of a cultural norm has participated in a boundary crossing. This boundary crossing is not necessarily harmful to the client and may have actually strengthened the rapport between the supervisor and supervisee (Kozlowski et al., 2014). However, if a boundary crossing occurs and results in exploitation, harm, loss of objectivity, or damage to the supervisory relationship, then it would be considered to be a boundary violation (Kozlowski et al., 2014). As Bleiberg and Baron (2004) explain, a boundary crossing does not always cause harm, but a boundary violation does. In dual relationships, the participants operate on a slippery slope where boundary crossings may accidentally or intentionally lead to boundary violations (Bleiberg & Baron, 2004). Thus, it is critical to remain vigilant in dual relationships.

Most researchers agree that the ideal standard is for dual relationships to be avoided in counseling supervision, yet this ideal is unattainable (Cobia & Boes, 2000). Based on the available research, it seems that there are three fundamental problems with dual relationships in counseling supervision. First, there are usually competing goals amongst competing relationships (Bernard & Goodyear, 2014; Cobia & Boes, 2000). Second, supervisors have more power in the supervisory relationship than do their supervisees, which could lead to supervisees being exploited (Bernard & Goodyear, 2014; Jackson, 2007; Kozlowski et al., 2014). Third, supervisors are at risk of losing their objectivity when they partake in dual relationships with their supervisees (Barnett

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& Molzon, 2014; Bernard & Goodyear, 2014; Borders & Brown, 2005).

### **Guidelines for Dual Relationships**

According to Borders and Brown (2005), a supervisor must avoid any situation that may skew his or her objectivity towards a supervisee. Moleski and Kiselica (2005) further established the following guidelines for dual relationships: (1) establish healthy boundaries at the beginning of the relationship; (2) secure informed consent and discuss risks and benefits; (3) openly communicate about problems as they arise; (4) consult with other professionals to clarify issues; (5) seek supervision for problematic dual relationships: (6) document dual relationships; (7) identify personal motivations in dual relationships; and (8) refer clients to other professionals if necessary. Additionally, Bleiberg and Baron (2004) identified the following five principles to honor when facing a dual relationship: (1) address change guickly; (2) explore countertransference; (3) control the anxiety related to the dual relationship; (4) check your competing values; and (5) abide by your limits. Borders and Brown (2005) summarize it well in stating that while dual relationships may be unavoidable or even necessary, it is important to maintain open communication regarding the multiple relationships, and it is imperative for supervisors to remain vigilant about potentially losing objectivity.

## **Counseling Association Guidelines**

In addition to researchers and professionals addressing dual relationships, the American Counseling Association (ACA), the American Psychological Association (APA), and the American School Counselor Association (ASCA) address dual relationships in their ethical standards. The ACA (2014) outright prohibits sexual relationships

between supervisors and supervisees. The ACA (2014) requires that supervisors remain ethical in their relationships with supervisees, including dual relationships. Specifically, the ACA (2014) states that supervisors should maintain sound judgement and ensure that harm does not occur throughout a dual relationship. The APA (2017) prohibits psychologists from engaging in a dual relationship, including a supervisory dual relationship, if the psychologist would be unable to remain objective or if the relationship would result in exploitation. The ASCA (2016) addresses school counselors who serve as supervisors for interns in its code of ethics. In the code, school counselors are instructed to refrain from supervisory relationships if they are unable to maintain objectivity (ASCA, 2016).

#### **Future Research**

After examining the research that is available regarding dual relationships in counseling supervision, it is clear that several areas need to be explored further. First, several questions remain unanswered regarding dual relationships in group training. As Goodrich (2008) explicates, there is a lack of understanding regarding the differences between group trainings that are supervised by professors and those that are supervised by an outsider who is hired to be the facilitator. Goodrich (2008) also notes that there is limited information about the attitudes of counselors-in-training toward dual relationships in group training. Second, Jackson (2007) reports that most sexual misconduct in academic realms occurs between a male supervisor and a female supervisee. Third, it was difficult to find information about dual relationships in peer supervision. While this may be due to the low occurrence of peer supervision, it is still a needed area for research. Fourth, there is a need for additional research regarding dual relationships that are seemingly unavoidable, such as in rural communities. As Gonyea et al. (2014) explained, these complex relationships exist throughout the world, but thorough guidelines pertaining to them do not.

#### **Personal Reflections**

Through my work, I have discovered that some dual relationships are unavoidable. Nonetheless, I believe that any dual relationship, whether it can or cannot be prevented, should be thoroughly explored at the onset and throughout its duration. For instance, a supervisor and supervisee should discuss the dynamics of their dual relationships such as the supervisor also being the supervisee's professor and advisor. Furthermore, sexual dual relationships should be avoided at all times. The power differential between supervisors and supervisees in a dual sexual relationship cannot be ignored.

I recently gained firsthand insight into navigating a dual relationship when I participated in peer-to-peer supervision with a colleague. During our first meeting, we discussed that our peer supervisory relationship would be impacted by our professional relationship since we were both serving as school counselors and colleagues. We created a contract that acknowledged our dual relationship and outlined steps to prioritize our peer supervisory work. We did not encounter any major issues concerning our dual relationship during our peer supervision, but I believe that was mainly due to our commitment to authentically communicate with each other. I fully acknowledge that a five-month experience in peer-topeer supervision does not enable me to

espouse expertise regarding navigating dual relationships in peer supervision. However, the foundations my colleague and I set might provide the same foundations for success for others: develop a contract, acknowledge dual relationships at the onset, consult the ethical codes, communicate openly throughout, address concerns as they arise, and be willing to consult with other professionals as needed.

The concept of dual relationships in counseling supervision is not new, yet it is not well understood because it has not been adequately represented in research until recently (Syme, 2006). Accordingly, additional research is needed to protect professionals, clients, and counselors in training, as well as to create relevant training to better educate and prepare potential participants in dual relationships, including the much-needed school counselor peer-to-peer supervision.

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