# Paternalism in Supervisory Relationships

# Kenneth R. Greene

ABSTRACT. Supervision is a vital part of practice for many social workers. In many settings, social workers must provide administrative as well as clinical supervision. Social work supervision is filled with ethical dilemmas due to the unequal power relationship between supervisor and supervisee. Charles Levy proposes 5 principles to prevent the misuse of supervisory power. These principles may create another dilemma which stems not from a selfish disregard for the supervisee but from a sincere desire to do what is best. This article will describe and analyze paternalism as it relates to supervision using two case examples and W. D. Ross's theory of ethics. [Article copies available for a fee from The Haworth Document Delivery Service: 1-800-HAWORTH. E-mail address: <getinfo@haworthpressinc.com> Website: <a href="http://www.HaworthPress.com">http://www.HaworthPress.com</a> © 2002 by The Haworth Press, Inc. All rights reserved.]

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The provision of supervision is a vital part of practice for a great number of social workers. In many settings social workers not only provide clinical supervision but administrative supervision as well. These social workers are charged with such varied responsibilities as hiring and firing, training, grant-

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ing promotions, performance evaluations and salary recommendations in addition to day to day program supervision.

The professional practice of social work supervision is filled with ethical dilemmas. One area of ethical concern for supervisors is paternalism toward the supervisee. The power a supervisor holds over a supervisee is significant. Because of this power differential, supervisors must struggle with the same issues of paternalism that caseworkers, therapists, physicians and nurses face with clients. This purpose of this article is to describe paternalism as it relates to supervision and analyze the problem using W. D. Ross's theory of ethics. Implications for ethical social work supervision will be discussed to help supervisors avoid the potential misuse of power inherent in the supervisory role.

### **SUPERVISION**

The Social Work Dictionary defines supervision as:

An administrative and educational process used extensively in social agencies to help social workers further develop and refine their skills and to provide quality assurance for the clients. Administratively, supervisors often assign cases to the most appropriate worker, discuss the assessment and intervention plan, and review the worker's ongoing contact with the client. Educationally, supervision is geared toward helping the worker better understand social work philosophy and agency policy, become more self-aware, know the community and agency's resources, establish activity priorities, and refine knowledge and skill. (Barker, 1987, pp. 160-161)

Charles Levy was one of the first to address the issue of ethics in supervision. In 1973, he wrote an article for the journal Social Work entitled "The Ethics of Supervision." His stated purpose for writing the article was to provide a "set of ethics . . . to guide the supervisor's conduct" (p. 16) in a time when the distribution of power between supervisee and supervisor favored the supervisor.

In the article, Levy (1973) identified six sources of power available to the supervisor. The first source of power is the supervisor's position as a liaison between the supervisee and the agency. In this capacity the supervisor represents and interprets the supervisee's work to those higher in the agency structure. Another source of power is the supervisor's large influence over the supervisee's continued employment in the agency. A third source of power is the ability to control salary increases, promotions and performance appraisals. The supervisor also enjoys the power of knowledge. Even in situations in which the supervisor is not more competent as a social worker, he maintains access to agency information that is unavailable to the supervisee.

In addition to the power of agency knowledge the supervisor also holds the power of personal knowledge. While it is inappropriate for a supervisor to require a supervisee to discuss information of a purely personal nature during supervision, inevitably the supervisor will know more about the supervisee's private life than the other way around. Finally, the supervisor holds the power of continued influence beyond the supervisee's tenure on the job. Few employers require a letter of reference from a former supervisee but most expect a reference letter from a former supervisor. These power inequities continue to exist today. Supervisors still exert tremendous influence over the advancement of social workers. Misuse of this power can be devastating.

In an attempt to prevent the misuse of supervisory power, Levy (1973) proposed five ethical principles that should guide supervision. Although it is not within the scope of this paper to critique these principles they will be mentioned because of the role they play in creating another misuse of supervisory power. The first principle flows directly from Kantian deontology. The supervisor should do that action which is most consistent with specific values and not necessarily that which will produce the best consequences. Levy goes on to say that the supervisor should be a model of ethical behavior. This is an important assertion. Twenty-one years later, Wimbush and Shepard, writing for the Journal of Business Ethics, reported that "the behavior of supervisors is the primary influence on individuals' ethical behavior" (1994, p. 642).

The second principle, proposed by Levy (1973), is that the supervisee should be assigned a job commensurate with his or her skills and not simply what is practical for the agency. The third principle is that the supervisor should make every effort to help the supervisee get off to a good start and should take any failure personally. This principle seems to speak to the issue of investment. The supervisor should make a special investment of time, energy and expertise in helping the supervisee move beyond dependence on the supervisor. The fourth principle states that the supervisor should look ahead and address himself to both the immediate situation and future consequences for the supervisee. Levy states it this way: "(T)he supervisor owes it to the supervisee to determine whether there is a correlation between the supervisee's aspirations and opportunities" (1973, p. 20). Finally, Levy states that the supervisor should always let the supervisee know his or her standing within the agency. He concludes these principles by stating that what is important is that the supervisee is treated equitably and protected against the hazards inherent in a relationship with an unequal distribution of power.

These seem to be a fairly good, as far as they go, set of principles to prevent the blatantly unethical misuse of supervisory power. The problem is that these principles may actually promote another more subtle misuse of power, one that stems not from selfish disregard for the supervisee but from a sincere desire to do what is best. A supervisor, in an effort to protect the supervisee, may misuse power to control the supervisee's employment unnecessarily. This problem may be referred to as supervisory paternalism.

## **PATERNALISM**

Paternalism is a well-known concept in the ethics literature. Gerald Dworkin defined paternalism as "the interference with a person's liberty of action justified by reasons referring exclusively to the welfare, good, happiness, needs, interests or values of the person being coerced" (1972, p. 66). Gert and Culver (1979) add that the one acting paternalistically should be qualified to act on the beneficiary's behalf, the beneficiary believes that she knows what is for her own good, and the beneficiary has not given consent to the actions performed on their behalf. While defining paternalism simply as "interfering with an individual's freedom for his or her own good" (1983, p. 255), Reamer described three forms of paternalism. Paternalism may take the form of direct interference or coercion, withholding of information, and disseminating misinformation.

The concept of paternalism is not new to social work nor to discussions of ethical social work practice. Paternalism has been discussed in relation to welfare dependency (Murray, 1992), working with the disenfranchised (Breton, 1991), protective service workers (Abramson, 1989), issues of care in long-term care facilities for the elderly (Moody, 1988), and discharge planning (Abramson, 1983) to list a few. Some articles, such as Reamer's "The Concept of Paternalism in Social Work" (1983), approach the topic from the standpoint of general social work practice with clients. Others, such as Kasachkoff (1994), address the topic of paternalism from a philosophical point of view. However, few articles have addressed paternalism as it is manifested in a supervisory relationship.

In 1984, Marciniak advised leaders of religious institutions to abandon their tendencies toward paternalistic styles of leadership and adopt models for relating with staff that promote mutual respect. Ten years later, Padavic and Earnest (1994) conducted a qualitative analysis of working conditions at two manufacturing firms in rural north Florida and concluded that paternalism was alive and well. These attempts to address paternalism in labor relations, though few and far between, serve to provide evidence that concerns over paternalism need not be left in the arena of client-worker relationships.

Supervisors, in their relationships with supervisees, must struggle with the same issues of paternalism that caseworkers, therapists, physicians and nurses face with clients. The grounds for paternalism towards supervisees rise from

the same sources as those for clients. Let's return for a moment to Levy's 1973 work. He characterizes the supervisory relationship as being based on unequal power. More importantly, he parallels the relationship between the supervisor and supervisee to that of the client and social worker. In essence, Levy encourages the supervisor to consider the supervisee as a client. Levy states that the "supervisor's scrupulous regard for the supervisee's welfare and development therefore stems not only from the definition of the supervisor's function in the agency but from his concern for the supervisee as a human being—a concern to which the supervisor is committed as a professional social worker" (1973, p. 19).

Social work practitioners often find themselves in ethical dilemmas between respecting the self-determination and autonomy of clients and promoting their welfare. Conscientious supervisors face these same dilemmas in their professional relationships with supervisees. Perhaps a few actual cases will illustrate this point.

### Case 1

Mike is a front line supervisor for childcare workers in a residential treatment facility for adolescents. The agency utilizes married couples and pairs of never married individuals working in teams to provide around the clock supervision in the cottages. Cottage parents work 24-hour days for up to a week at a time before receiving time off. Coupled with the nearly constant need to give attention to adolescents, this is a very demanding schedule.

One day, Sherry, a young cottage parent, excitedly announces she is getting married. Mike is at once excited and concerned for Sherry because she has made it known that she intends to continue working as a cottage parent after the wedding. Mike knows that he will be pressured by administration to ask Sherry to resign. He appreciates the fact that the demanding schedule is not very conducive to a new marriage, but he also knows that Sherry is a dedicated and capable employee. He respects Sherry's autonomy, yet he realizes that the first year of marriage is typically tough for any young couple and it will certainly be even tougher considering the demanding work schedule for cottage parents.

### Case 2

For the first four years that Kristie worked for a large multiple site social service agency, she had been supervised by Theresa, a highly competent and experienced program director. The two enjoyed a strong professional relationship built upon mutual respect and a common commitment to quality. Theresa's ap-

preciation for Kristie's work was recorded on five strong performance evaluations. Shortly after Kristie's four-year anniversary, Theresa was promoted to a senior administrative position, which required a transfer to another site. Soon after this, Kristie requested and was granted an educational level of absence.

Six months later, while discussing Kristie's return to work, Theresa encouraged Kristie to apply for the soon to be vacant program director position. Kristie applied and seemed to sail through the interview process, which included a group interview with all the staff Kristie would supervise. Before making her decision Theresa decided to solicit feedback from these staff members. Although Theresa discovered numerous staff in favor of Kristie's promotion, she also found a small group of staff adamantly opposed to the promotion. Remembering her own tenure as program director, Theresa clearly understands the demands of the job and the increased demands of dealing with disgruntled staff. She also appreciates Kristie's talent and believes that her opportunities will be greatly expanded when she completes her education. She doesn't want to interfere with Kristie's progress towards this goal.

These are only two examples of ethical dilemmas facing supervisors who sincerely care about the total welfare of their supervisees. Issues involving paternalism can be found in case and job assignment decisions, decisions regarding allocation of benefits, and decisions to protect employees from feelings of rejection by failing to provide information or providing incomplete or misinformation. While it is recognized that paternalism may be used as a shield to hide organizational or self-serving interests the focus of this paper is on those cases in which the supervisor is truly concerned with the total welfare of the supervisee as a person. The question that begs to be answered is "What are the limits of ethical supervisory conduct in attempting to serve the best interests of the supervisee?"

# ROSS'S DEONTOLOGY

One way to help answer that question is to consider it from the perspective of an established ethical theory. W. D. Ross, in his book "The Right and The Good," proposed a theory of ethics. He later presented a more fully developed conception of his theory in "Foundations of Ethics." His is a type of deontological theory that seems to bridge the gap between the hard deontology of Kant and the utilitarianism of John Stuart Mill. This makes it an attractive theory for use in this evaluation.

Ross's version of deontology is based on the concept of prima facie duties. Essentially Ross states that ethics are determined by following a set of duties. These duties are right based on their own merit and not because of the consequences which follow. For example, when a person keeps a promise, it is done not because it will produce a good consequence but because it is right to keep a promise. An ethical action is a right action. Ross defines right as that which a person is morally obligated to perform. Also, an act may belong to a group of possible actions such that one of the acts, not a specific act, should be performed. In this case, no single act is a duty. It is a duty only that one act from the group of acts be performed.

Prima facie duties are duties that a person is obligated to perform unless two or more prima facie duties conflict such that the performance of one prevents the performance of another. These are distinguished from absolute duties, which a person is always obliged to perform without exception. Ross (1930) identifies seven prima facie duties while admitting that this list may not be an exhaustive list.

Duties of fidelity involve keeping of promises both made and implicit. Duties of reparation involve making amends for a previous wrongful act. Duties of gratitude involve payment for services rendered by someone else. Duties of justice involve distributing pleasure and pain based on the merit of the recipient. Duties of beneficence involve improving the condition of others when it is in one's power to do so. Duties of self-improvement involve increasing one's own condition in regards to virtue, knowledge and pleasure. Ross qualified his views of seeking personal pleasure. This qualification will be noted shortly. Duties of non-maleficence involve refraining from any act which would bring injury to another (1930, p. 21).

Ross also identifies a prima facie duty of promoting the general welfare, which includes a duty to bring as much of that which is intrinsically good into being as possible. However, regarding pleasure, we do not have a duty to produce our own pleasure. Producing pleasure for ourselves is only a duty if it is thought of as an objective good, which an impartial judge would approve.

When two or more prima facie duties come into conflict, the situation must be weighed to determine which duty carries the strongest obligation at the time of the conflict. For example, if keeping a promise to one's child conflicted with keeping a promise to a stranger such that keeping one promise prevented the keeping of the other, a decision must be made regarding which duty was most obligatory. In this case it is likely that a promise to a child would be more obligatory than a promise to a stranger based on the nature of the relationship between the promisee and promisor. However, other prima facie duties may be involved, such as a duties of reparation or beneficence, as in the case of promising a stranger with whom one had just been involved in an automobile accident that you will go to get help. Ross gives two guidelines for determining which duty is most obligatory: Contractual obligations are more stringent than noncontractual obligations. And, an act is right by virtue of its whole intrinsic

nature. It may contain prima facie right and prima facie wrong components but its rightness is determined not by the parts but the whole.

Ross moves quickly from discussing that which is right to that which is good. He makes a marked distinction between the two. The performance of a duty because it is morally obligatory regardless of motive is right but not necessarily good. The only acts that are morally good are those that are produced from a good motive. Acting from a good motive is never morally obligatory since people cannot control their motives. A motive either exists or it doesn't. It can't be simply called up on command, but it can be cultivated through acting in such a way as to produce it.

Ross stated that goodness was intrinsic, i.e., good apart from its consequences. That which is good is not good because its consequences are good, nor is it good because it is the object of desire. Instead that which is good produces both good consequences and desire. He further identifies a hierarchy of good things. These are, in order of value, virtue, knowledge and well-grounded opinion, and pleasure. He also includes the correct apportionment of pleasure to the virtuous and pain to the vicious as another intrinsic good but fails to include it in discussions regarding value comparisons. Everything else that is good is a combination of these. The highest motivation for an action and thus the most morally good is the motivation to act out of duty. This is what Ross means by virtue.

Ross assumes that a set of discernable, objective duties exist. He assumes that people are rational and capable of determining the right action when two or more prima facie duties conflict. He also assumes that performance of the most obligatory prima facie duties will ultimately produce the most good for society as a whole. Finally he assumes that goodness is intrinsic. It can be defined in the sense of being described but cannot be proven.

## ANALYSIS OF CASES

## Step One

The first step in analyzing the cases is to determine which prima facie duties are relevant (see Figure 1). In an employment situation, there are many promises that are either stated in an employment contract or policy manual or implied by the nature of the relationship. One of these promises is that employment is contingent on job performance, i.e., workers who perform their assigned duties well will continue to remain employed as long as the agency needs those services and has the resources to support the worker in the job. In both cases described above the supervisees were in good standing in terms of job performance and the agency planned to maintain the positions in question.

An additional promise, which is relevant in Sherry's case, is the promise not to interfere in her private life except in those situations regulated by explicitly stated policy. For example, if Sherry were a smoker and the agency had a no smoking policy, this should not interfere with her right to smoke in her home. However, if she were charged with child molestation this would likely interfere with her right to continued employment.

Kristie enjoys the promise of respect for her autonomy regarding career advancement. She should be allowed to decide for herself which career options to pursue. She also maintains a promise of impartiality from her supervisor when assessing skills and ability to perform another job assignment. In other words, as a promise of employment Kristie can expect to have the opportunity to apply for any available job assignment for which she is qualified and to have her qualifications and work history judged impartially.

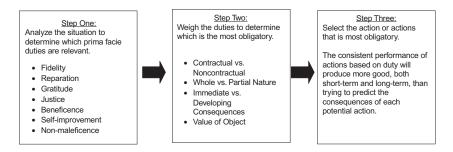
These promises are all strengthened by the nature of the relationship. Duties of gratitude require that proper payment be made for services in the past. Ross (1960) likens this duty to the special claim that parents and friends have on a person. Both Sherry and Kristie had demonstrated several years of faithful service. This does not necessarily give them a claim to preferential treatment but it does strengthen the claim that each has on the fulfillment of the promises stated above. Based on the duty of gratitude, an employer has a stronger obligation to an employee in good standing within the agency than an applicant from outside the agency, such that, all other factors being equal, an act in favor of the current staff member would be preferred.

The third category of duties, which is pertinent to this discussion, is duties of beneficence. This is basically the duty to do whatever is within one's power to improve the condition of others. Social workers are obligated to act in accordance with the best interests of the client. According to Levy (1973), this should also be an obligation of supervisors.

Supervisors have an obligation to promote growth and development of their supervisees through, training, feedback, counsel, and any other method available to them. This obligation may be construed to extend beyond the agency setting. To take Levy's admonition seriously would mean that the supervisor should be concerned about the supervisee's personal as well as professional well-being. This is one of the primary justifications for paternalism.

The final prima facie duty, which is relevant in this discussion, is the duty of non-maleficence or the duty to refrain from any act that would bring injury to another. This duty can actually be used to build a case for or against paternalism in each of the cases being considered. In the affirmative, the supervisor is obligated to refrain from placing Sherry or Kristie in a situation that would be harmful. Mike's concerns about Sherry continuing to work a schedule which would be harmful to her new marriage can be grounded on this duty. Theresa

FIGURE 1. Steps in analyzing an ethical course of action using Ross's theory of ethics.



may argue that promotion of Kristie into such a difficult situation may interfere with her continued progress toward an advanced degree and thus harm her chances at future advancement.

An opposite view can also be promoted under this duty. Mike is obligated to refrain from requiring of Sherry an action, in this case "voluntary" termination, which will likely harm Sherry in many ways including loss of income, loss of medical benefits and, in Sherry's case, loss of housing. Termination may also harm Sherry emotionally. On the surface Theresa's failure to promote Kristie would not be harmful to Kristie. However, a closer look reveals several harms. First, there is the harm of violated trust. There is also the harm of lost autonomy in making career decisions. Remaining in a job for which she has become over-qualified may also harm Kristie. This could easily stifle growth and motivation.

# Step Two

The second step in analyzing an action, according to Ross's theory, is to weigh the duties to determine not which will produce the most good, but which is most obligatory or right. The duties to be evaluated in these cases are the duties of fidelity, gratitude, beneficence and non-maleficence. In the case of non-maleficence, the task is to determine the nature of the duty as well as its weight.

In the matter of determining the weight of the duty to keep the promises mentioned above, Ross provides some specific guidelines. Promise keeping is afforded greater weight when the object of the promise is more important. Ross explains degrees of importance as the difference between promising to visit a sick friend who longs for company and promising to attend the theater with a friend who will not miss him much if he doesn't go (1939). In this exam-

ple the promise to the sick friend is more important. Ross further states than an explicit promise is more binding that one made in passing; a promise made in the near past more binding than one made in the far past; and, in general, promises take precedence over promoting general good.

In the cases in question, the promises that were made carry a significant amount of weight. Obviously the promise to base continued employment on job performance and agency need is a very important and much desired promise for a worker in good standing. The promise of autonomy and self-determination are also weighty promises. These promises are all either explicitly stated in an employment contract or generally understood as part of the professional relationship. It has already been stated that the duty of gratitude would lend greater weight to each of these promises.

Ross (1930) states two conditions for relieving a person of the duty of fidelity: (1) One is no longer obligated to fulfill a promise if the promise becomes impossible to fulfill, and (2) One is not obligated to fulfill a promise if the recipient of the promise convinces the promisor that he no longer expects or wants the promise fulfilled. Neither of these conditions is present in the cases in question. In fact, these conditions are absent from every case of supervisory paternalism, which is by definition an act of interference with a supervisee, against her own wishes, but for her own good. But Ross makes one last point, which speaks directly to paternalism.

There is another change of circumstances, regarding which we must ask ourselves whether it abrogates the prima facie duty of fulfilling a promise. Suppose that it is still possible to fulfill it, and that the promisee wishes for its fulfillment, but that we have become convinced that its fulfillment will do him harm, or less good than something else we might do instead. Here we think of the promise as still binding upon us; we think of ourselves as still under the prima facie obligation. But this, like all prima facie obligations, is open to the competition of others, and it is only to be expected that when the advantage to be given to the promisee by some alternative act is very great, the sense of obligation to do that act should outweigh the sense to fulfill the promise. (1930, p. 111)

One gets the sense in reading Ross that the duty of beneficence may sometimes be a necessary evil to his theory. While he acknowledges that a moral agent is obligated to promote the general welfare, he spends much of his energy arguing against the utilitarian assertion that this is the only consideration in determining an action's rightness. Ross seems to promote the idea that if the other duties are followed the duty of beneficence will take care of itself. Furthermore, Ross would certainly place a higher value on promoting the present

good, for example, giving a hungry man some food, than on the long-term good discussed in these cases.

The duty of non-maleficence is a weighty duty. In a situation, such as the one stated above, in which a duty involves both prima facie right and wrong elements, the agent must decide the nature of the duty in its entirety. In the case of determining the nature of the duty of non-maleficence discussed above, Ross gives particular help. He states, "(I)t seems to me clear that the situation which an act must fit if it is to be right is the situation that exists when, or just before, the act is done, not the situation as it will develop if modified by the act" (1930, p. 81). Later Ross states that we can only be reasonably certain of immediate consequences. Therefore, it is only appropriate to concentrate on the present harms if the act is performed. In Sherry's case, termination will immediately affect her income, benefits and housing. Other considerations are mere speculations of the future and thus the duty of non-maleficence argues against paternalism. In Kristie's case, the present harms are broken promises and reduced autonomy to pursue career goals. Other considerations are future oriented.

As far as weight, Ross is very clear that the duty of non-maleficence is almost always weightier than the duty of beneficence. The only exception to this weighting of the two duties is when the good to be produced is "substantially" greater than the harm (1930, p. 75). Just how much is required to be substantially more is debatable. This process of weighting the two duties should not change when the good and harm are produced for the same person. Sherry and Kristie's cases do not meet the substantial criteria due to the distance of the anticipated good. Therefore the duty of non-maleficence is the weightier duty.

The results of step two can now be restated. The weightiest duty is the duty of fidelity. This weighting is based on the nature of the employment contract and the special relationship, involving duties of gratitude, between the supervisor and the supervisee. Following close behind the duty of fidelity is the duty of non-maleficence. This duty was judged to favor a non-paternalism position based on the proximity in time of the anticipated harms. Standing in a relatively weak position is the duty to beneficence.

# Step Three

The final step is to select the exact action or set of actions that is obligatory. The best action would be the one that would fulfill all the duties relevant to the case. In situations where this is impossible, an action should be chosen based on the analysis of the weighted duties. Three potential options present themselves for consideration. The first option is to ignore all concerns for the

general welfare of the supervisee and base the necessary decision strictly on the merit of the supervisee's performance. This option allows the supervisor to perform the duty of non-maleficence and most of the duties of fidelity. However, the duty of beneficence is ignored and at least one implied promise is not kept. This promise can be found in Levy's (1973) admonition that the supervisor look ahead and address both the present and future consequences of any action for the supervisee. The supervisee should reasonably expect this feedback from her supervisor as a regular part of supervision.

The option at the other extreme is to allow the supervisor's concerns for the future welfare of the supervisee to dictate the decision. This is clearly a poor choice as it makes it impossible to fulfill the duties of fidelity or non-maleficence. This action would result in termination for Sherry and an abrupt end to Kristie's desire for promotion. Clearly, these first two options are less than ideal.

One final option exists. This is the option to frankly discuss the supervisor's concerns in a supervisory conference. In the case of Sherry, it may be prudent to extend to her the invitation to involve her future husband in the meeting. After gaining assurance that the concerns are understood, the supervisor should allow the employment decision to remain entirely with Sherry. Theresa's concerns for Kristie should also be discussed in a supervisory conference. Without breaking confidences with the staff opposed to Kristie's promotion, Theresa could present the facts of the situation and her concerns for Kristie's future. The final decision for promotion would remain with Theresa but in this case it would be made with opportunity for input from Kristie.

This option allows all the relevant duties to be performed. All promises of employment and supervisory guidance are kept with Sherry and she does not suffer the harm of termination. Additionally, she has access to information about her supervisor's concerns regarding marriage and the cottage parent work schedule. This duty of beneficence is performed in such a way as to further promote Sherry's independence and autonomy. For Kristie, she does not suffer the harm of being shut out of the decision regarding her advancement within the agency. Neither are promises to respect her autonomy and to impartially evaluate her suitability for the job broken. Like Sherry she benefits from the forthrightness of the supervisor expressing concerns for her long-term welfare while maintaining the option to respond and provide input to decisions which affect her.

### **CONCLUSIONS**

This article has discussed two examples of supervisory paternalism. The cases presented above are not exhaustive examples of paternalism in supervisory relationships. However, the cases are actual cases that illustrate two closely related ethical dilemmas encountered by supervisors who take seriously Levy's charge to be concerned for the supervisee as a person. The cases illustrate the use of Ross's theory of ethics to determine the most appropriate course of action for the supervisor. While the resultant solutions to these cases cannot be generalized to all other cases of potential supervisory paternalism, a few concluding statements can be made about the ethical implications involved.

The power differential inherent in a supervisory relationship is not unlike that found in a social worker-client relationship. In fact, in a very real sense, social work employees and supervisees are the "clients" of a social work supervisor. In this relationship supervisees must be treated equitably and protected from the hazards inherent in a relationship with an unequal distribution of power. Consequently, the same ethical standards should be applied in supervisory relationships as are applied in relationships with clients in order to avoid such problems as paternalism, which fights against the ethical value of promoting self-determination.

There are no easy answers to ethical dilemmas, but an established theory of ethics can be a useful tool for sorting through the sometimes conflicting demands and expectations of ethical behavior. A theory structures the decision-making process by identifying key constructs to be considered and questions to be asked. More importantly, a theory of ethics such as Ross's provides the supervisor with a tool for deciding between actions when ethical values seem to collide as in the case of supervisory paternalism. Paternalism is based on the idea of doing good or promoting the general welfare of the supervisee, yet by doing so it lessens self-determination. Ross's theory provides a tool for sorting through this dilemma.

According to Ross, the consistent performance of actions based on duty will produce more good, both short- and long-term, than trying to predict the consequences of each considered action. Supervisors should be more concerned with keeping promises, both explicit and implied, with supervisees than promoting some anticipated future good. It is more important to refrain from producing harm than to produce good. Many times it is possible, with a little effort, to discover an action which can avoid paternalism while at the same time promoting the supervisee's long-term good. These solutions allow the supervisor to fulfill the duties of fidelity, beneficence and non-maleficence. These conclusions may seem self-evident but the continued presence of supervisory paternalism demands they be restated.

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