

Public consultation: Draft guidelines for the 5+1 internship program

The Psychology Board of Australia (the Board) is seeking your feedback on the development of the *Draft guidelines for the 5+1 internship* (draft 5+1 guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

Please email your submission to: psychconsultation@ahpra.gov.au. The submission deadline is close of business on **Wednesday 2 July 2025**.

Initial questions: *To help us better understand your situation and the context of your feedback, please provide us with some details about you.*

Question A: Are you completing this submission on behalf of an organisation or as an individual?

☒ Organisation

Name of organisation: College of Professional Psychology

Contact email: [REDACTED]

☐ Individual

Name: [Click or tap here to enter text.](#)

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Question B: If you are completing this submission as an individual, are you:

☐ A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

☐ A consumer / client?

☐ Other – please describe: [Click or tap here to enter text.](#)

☐ Prefer not to say.

Questions for consideration – Updating the Guidelines for the 5+1 internship program

Preferred option

Question 1: Do you support the Board's preferred option (option 2) to update the **5+1 guidelines**? Please provide reasons for your view.

Your answer:

The College of Professional Psychology supports the Board's preferred option to update the 5+1 internship guidelines. We believe that aligning the guidelines with the updated competencies is a necessary and timely step towards providing a coherent and contemporary learning and training framework for provisional psychologists.

These updates present an important opportunity to incorporate insights gained over the past 12 years, recognising what has worked well, identifying areas that require improvement, and responding to the evolving needs of provisional psychologists during their sixth year of internship. Revised guidelines that reflect these learnings will help ensure that future psychologists are well-prepared, ethically grounded, and equipped to meet the diverse and complex needs of the Australian community.

While we agree with and support the Board's intention to update the guidelines, we also have some concerns about aspects of the current draft as described in more detail in answer to the questions below.

Specifically, we are most concerned about the removal of case reports and the minimum professional development hours. Case reports have, in our experience with hundreds of provisional psychologists going through the college programs, served as a valuable tool for assessing clinical reasoning, ethical decision-making, and reflective practice. Our structured professional development curriculum mapped onto the core competencies and the national psychology exam curriculum has produced high quality, ethically sound, practice ready provisional psychologist skilled to make a positive contribution to the mental health of the community.

In addition, a December 2025 rollout of the draft guidelines does not provide the College with adequate time to meaningfully refocus and restructure our programs to align with the new requirements. This timeline limits our ability to demonstrate the full value of our training model under the revised framework and to ensure that provisional psychologists are effectively supported and equipped to meet the updated competencies and expectations.

Question 2: Are you in support of including the updated competencies as outlined in the [Professional competencies for psychologists](#) into the **draft 5+1 guidelines**? Please provide reasons for your view.

Your answer:

The College of Professional Psychology supports the inclusion of the updated competencies, as outlined in the *Professional Competencies for Psychologists*, into the draft 5+1 guidelines. We believe this alignment is essential to ensuring that the internship year provides a coherent, contemporary, and competency-based framework for learning and professional development.

The updated competencies reflect not only the evolution of psychological practice over the past 12 years but also the changing landscape in which psychologists operate. In particular, the increasing cultural diversity of the Australian population requires that provisional psychologists are equipped with the cultural responsiveness and awareness necessary to provide safe, inclusive, and effective care to individuals from a wide range of backgrounds.

Additionally, the rapid advancement of digital and AI technologies is reshaping the delivery of psychological services. It is critical that the competencies reflect in the 6th year training address the ethical, practical, and clinical implications of these technologies, ensuring that provisional psychologists are prepared to navigate digital platforms, telehealth, data privacy, and the integration of AI tools in practice.

Embedding these updated competencies into the 5+1 guidelines will enhance the relevance, rigour, and responsiveness of the training framework, supporting the development of psychologists who are not only competent and ethical but also adaptable to the evolving needs of the Australian community.

Question 3: Do you agree with the proposed changes to the requirements of the 5+1 internship (refer to Table 1)? Please provide reasons for your view.

Your answer:

The College of Professional Psychology acknowledges the intent of the proposed changes to streamline the 5+1 internship requirements and reduce administrative burden for interns, supervisors, and providers. While we support aspects of the proposal, we have significant concerns regarding the removal of key structural elements that have historically supported consistent, high-quality training.

1. Education and Training Requirements

We support the renaming of “professional development” to “education and training,” as it better reflects the structured, competency-based learning expected during the internship year. However, removing a clearly defined minimum number of education and training hours introduces ambiguity and risks undermining the development of core competencies.

We strongly recommend retaining the current minimum of 60 hours of professional development, reframed as education and training, as a baseline requirement, and at least aligned with CPD standards for generally registered psychologists.

Aligning internship expectations with at least CPD standards reinforces the importance of ongoing learning and helps establish good professional habits early in a psychologist’s career. This alignment supports a smoother transition to general registration and fosters a culture of lifelong learning and accountability.

Furthermore, all education and training activities should be explicitly linked to the newly defined core competencies to ensure that learning is purposeful, targeted, and directly contributes to the development of essential professional capabilities. This structured approach will help safeguard the quality and integrity of the internship experience across diverse settings.

2. Case Reports

While we acknowledge the limitations of the current case report format, we are concerned that removing this requirement without a robust, competency-based alternative may compromise the assessment of a provisional psychologist’s ability to conceptualise client presentations and “think like a psychologist.” The case report has long served as a critical tool for evaluating applied psychological reasoning, formulation, and treatment planning—skills that are essential for safe and effective practice and that develop and consolidate during practice in the sixth year internship. The College supports the retention of case reports as an assessment tool in the 5 + 1 internship year, recognising their value in fostering reflective practice and demonstrating core competencies in real-world clinical contexts.

Although foundational competencies in assessment, diagnosis, and intervention are covered in the fifth-year curriculum, the case report task provides a unique opportunity for interns to develop and demonstrate cohesive clinical reasoning during their sixth year. It requires them to integrate assessment data with the development and implementation of a formulation and treatment plan. From our experience with hundreds of provisional psychologists, we know that the ability to construct a coherent clinical understanding of a client is often the key factor distinguishing those who are ethically sound and ready for independent practice from those who are not.

Externally assessed demonstration pieces, such as case reports, also serve an important function in ensuring consistency and fairness. They provide a level playing field by holding all interns to the same standards when seeking general registration. In the supervisory

relationship, they offer an objective benchmark that supervisors can refer to when raising concerns about an intern's competence. This helps ensure that such concerns are not perceived as subjective or personal, but rather as aligned with the expectations of the regulatory body.

Furthermore, externally assessed case reports are particularly valuable in situations where there is disagreement between an intern and their supervisor regarding readiness for general registration. In such cases, an objective, standards-based evaluation can clarify whether the intern's skills meet regulatory expectations. This process supports fair and transparent decision-making and reinforces the principle that competence should be based on clearly defined professional benchmarks rather than interpersonal dynamics or self-perception.

We recognise that the current format may no longer reliably reflect individual competence, particularly given the widespread availability of detailed guidance, peer support networks, and increasingly sophisticated tools, including artificial intelligence. While these resources can enhance learning, they also raise concerns about the authenticity of submissions and the extent to which they reflect the intern's independent clinical reasoning.

3. Progress reports

We acknowledge that removing progress reports may reduce administrative workload. However, these reports have historically provided a valuable mechanism for supervisors to formally raise concerns about intern progress with the Board. While feedback from the Board has been limited, the process itself has supported transparency and accountability. Eliminating this reporting channel may reduce opportunities for early intervention and compromise the ability of supervisors to document and escalate concerns effectively.

In summary, while we support efforts to update and simplify the internship framework, we recommend retaining or replacing key structural components, such as minimum education and training hours, externally assessed case reports, and progress reporting mechanisms, to ensure the integrity, consistency, and safety of the 5+1 pathway.

Content of the draft 5+1 guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the **draft 5+1 guidelines**?

Your answer:

The College of Professional Psychology wishes to raise concerns about an ongoing issue that appears to remain unaddressed in the updated 5+1 internship guidelines, specifically, the practice of backdating internship plan approvals.

Under the current process, provisional psychologists must submit an internship program plan to the Board and are not permitted to commence direct client contact until the plan is formally approved. However, once approval is granted, the notification often indicates that the approval has been backdated to the date the plan was submitted or the date the intern commenced the role. This practice creates significant confusion and challenges for provisional psychologists and their supervisors.

During the period AHPRA is reviewing the plan, interns are unable to engage in client work, yet the backdated approval implies that they could have been doing so. This discrepancy places provisional psychologists in a difficult position, particularly in workplaces that are aware of the Board's backdating practice. In such cases, interns may be pressured to begin client work prematurely, before receiving formal approval, based on the assumption that the approval will be retroactively applied.

This situation introduces unnecessary risk and ethical tension for provisional psychologists, who may feel compelled to act outside of regulatory boundaries to meet workplace expectations. It also undermines clarity and consistency in the implementation of internship requirements.

The College strongly recommends that the Board discontinue the practice of backdating internship plan approvals. Alternatively, we urge the inclusion of a clear amendment to the

guidelines that explicitly addresses this issue, providing clarity and protection for provisional psychologists as they commence their roles.

Question 5: Is the language and structure of the proposed **draft 5+1 guidelines** helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer:

Notwithstanding the issue identified in the question above, the draft 5+1 guidelines are clear and workable.

Proposed implementation of the draft 5+1 guidelines

Question 6: If the changes are approved, the Board proposes to publish the **draft 5+1 guidelines** in advance and have a future date for when it comes into effect (1 December 2025) to allow enough time for provisional psychologists, supervisors and internship providers to prepare. Are you in support of this transition and implementation plan?

Your answer:

The College of Professional Psychology supports the intent of the proposed changes to the 5+1 internship guidelines; however, we recommend delaying the implementation date by one year, to 1 December 2026, to allow sufficient time for a thoughtful and effective transition.

The College of Professional Psychology has an over 30-year history of supporting hundreds of provisional psychologists in attaining general registration. Our mission is to produce practice-ready, ethically sound, high-quality psychologists who are equipped to meet the diverse needs of the Australian community. We achieve this through a structured, competency-based training program that emphasises consistent standards, ethical practice, and public protection. Our team-based supervision model ensures a robust and supportive learning environment, reducing the inherent risks associated with reliance on a single supervisor and promoting a culture of shared responsibility and quality assurance.

As a small but significant contributor to the training of psychologists in Australia, the College has played a key role in shaping a generation of competent professionals. We are committed to maintaining the integrity and quality of our program as the profession evolves. While we acknowledge that the revised guidelines are expected to reduce reporting and assessment requirements, implementing these changes by 1 December 2025 presents challenges. A one-year delay would allow the College to refocus and realign its program structure, supervision practices, and assessment processes to meet the new requirements while retaining its perceived value to provisional psychologists and without compromising the quality of training.

We also recommend that the Board's Frequently Asked Questions (FAQ) document explicitly address the concerns of currently registered provisional psychologists who are due to complete the 5+1 pathway after 1 December 2025. These individuals may perceive it as inequitable that they are still required to complete case reports under the existing guidelines, despite completing their internship after the requirement is removed for future cohorts. Clear, transparent communication will be essential to maintain trust and confidence in the fairness of the transition process.

While we support the direction of the proposed changes, we strongly recommend a revised implementation date of 1 December 2026. This will ensure that training providers, supervisors, and provisional psychologists are fully prepared to deliver and engage with the new guidelines in a way that upholds the high standards of the profession.

Potential impacts and benefits

Question 7: Are there specific impacts for supervisors, provisional psychologists, internship providers, international regulators, governments, employers, psychologists, clients/consumers or other stakeholders that the Board should be aware of, if the **draft 5+1** guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

The draft 5+1 guidelines offer some positive impacts, including a reduction in administrative burden for supervisors, internship providers, and provisional psychologists. Streamlining documentation and removing prescriptive requirements could improve efficiency and flexibility in managing internship programs.

However, we are concerned about several significant negative and unintended impacts, particularly for supervisors, provisional psychologists, and clients:

1. **Increased Burden on Supervisors**
The proposed framework places excessive responsibility on individual supervisors to assess competence without sufficient external safeguards. This may be particularly challenging for supervisors who are inexperienced, under-resourced, or working in high-demand environments.
2. **Risk of Inconsistent Competence Standards**
Without structured assessments or external moderation, there is a heightened risk of variability in how competence is interpreted and assessed. This could lead to inequitable outcomes for interns and compromise the consistency of training across settings.
3. **Vulnerability of Provisional Psychologists**
Interns may be placed in ethically and professionally challenging situations if their progression depends solely on a supervisor's judgement. This dynamic can lead to under- or over-assessment of competence and may encourage "supervisor shopping" to secure sign-off.
4. **Impact on Supervisory Relationships**
The quality of the supervisory relationship can significantly affect intern outcomes. In the absence of external oversight, interns experiencing difficult or unsupportive supervision may have limited recourse, increasing the risk of unresolved conflict and compromised training.
5. **Client and Public Risk**
Inconsistent or premature sign-off of interns who are not yet fully competent poses a direct risk to client safety and public trust in the profession.

To mitigate these risks, we strongly recommend the inclusion of external assessment components and clearer structural safeguards to support supervisors, protect interns, and uphold the integrity of the registration process.

Question 8: Would the proposed changes to the **draft 5+1 guidelines** result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them (see Appendix A of the preliminary consultation paper for more detail).

Your answer:

We have not identified any potential negative or unintended effects for Aboriginal and Torres Strait Islander peoples or other priority groups as a result of the draft 5 + 1 guidelines. Incorporation of the new competences should increase skills in assessment, diagnosis, formulation and intervention with these populations.

Question 9: Can you identify any other benefits, costs or regulatory impacts for practitioners, clients/consumers or other stakeholders from the proposal? If yes, please describe them (see Appendix B of the preliminary consultation paper for more detail).

Your answer:

We recognise that the draft guidelines aim to simplify the regulatory and administrative burden for internship program providers, supervisors, and provisional psychologists. Streamlining documentation and reducing prescriptive requirements may offer greater flexibility and efficiency in managing internship programs.

However, we are concerned that the proposed framework may inadvertently create pressures that compromise training quality. In particular, internal supervisors working in high-demand service environments may face organisational pressure to expedite an intern's progression to general registration in order to address staffing shortages. Without structured assessment requirements or external benchmarks, supervisors may lack the tools to justify the need for additional training, even when an intern has not yet demonstrated full competence.

This dynamic risks undermining the integrity of the internship process and may lead to inconsistent standards of competence across settings. It also places supervisors in challenging positions, where they must balance professional standards with organisational demands.

Other

Question 10: Do you have any other feedback or comments about **draft 5+1 guidelines?**

Your answer:

While the College of Professional Psychology acknowledges the need to review and update the 5+1 internship guidelines to reflect contemporary practice and the new professional competencies, we are concerned that the draft guidelines reduce essential structure and safeguards currently embedded in the +1 year. Our internship program demonstrates the value of a clearly defined, supportive training environment, one that ensures consistent supervision, structured education, and progressive skill development.

By removing key elements such as minimum education and training hours and externally assessed case reports, the proposed changes risk increasing variability in training quality and reducing consistency in intern preparedness. This shift places greater pressure on individual supervisors and raises the potential for inconsistent assessment of competence.

We recommend retaining structured requirements and external oversight to ensure safety, consistency, and fairness across all internship experiences.