

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: **Australian Psychology Accreditation Council (APAC)**

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: **Accreditation Council**

☐ 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:

Yes.

- updated guidelines to better align the internship program requirements with the contemporary regulatory context
- reduced regulatory burden and complexity of the internship
- the guidelines reference the recently updated professional competencies for psychologists
- language and structure of the guidelines updated to improve readability.

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:

Yes.

This better aligns training and expected outcomes.

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:

Yes.

1,500 internship hours. Supported, although some providers do argue that competence should develop as the the focus rather than hours.

Supervised practice. Supported, although this should be benchmarked over time to determine best practice and any deviation of supervisors from this best practice to determine whether this needs to be prescribed in the future to ensure public safety. If the supervisor is responsible for determining the appropriate number of supervisor practice hours, then it is important for there to be a formal review every 6 months to formally evaluate the provisional psychologist's progress, and for this to inform the number of supervised practice hours.

Client contact. No change supported.

80 hours supervision. Supported, although this should be benchmarked to determine best practice and any deviation of supervisors from this best practice to determine whether his needs to be prescribed in the future to ensure public safety.

60 hours of professional development. Supported.

Direct Observation. No change supported.

Logbooks. These need to be actively audited to ensure suitable record and be sought by the Board as required. A key issue that APAC wishes to explore is supervisor satisfaction with graduate outcomes from particular types of programs (eg face to face and online) and particular providers.

Six month progress reports. Change supported.

Case reports. Change supported.

Final assessment of competence. No change supported. This seems to be left entirely to the supervisor with no requirement on them to justify their approach to evaluation. If this is dealt with as part of the Board-approved Supervisor training then this will strengthen the approach. There needs to be consistency with the approach to the accreditation of degree programs which is evidence-based.

Minimum time – 44 weeks. No change supported.

Maximum time – 5 years: No change supported.

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:

This should be benchmarked to determine best practice and any deviation of supervisors from this best practice to determine whether his needs to be prescribed in the future to ensure public safety.

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:

Yes

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: A transition plan should be negotiated with HEPs (facilitated by Accreditation Councils as necessary). Although transition could be implemented by 2025 as required.
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: Implementation of transition to new standards and guidelines should be agreed to meet required deadlines. There is a concern that principal supervisors have few checks and balances with removal of the need for 6-monthly progress reports and alternative mechanisms should be considered. This is also a loss of a critical opportunity for formal review of, and feedback on, their provisionally registered psychologists' progress toward meeting with required competencies.
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: None identified.
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: None identified
Other
Question 10: Do you have any other feedback or comments about draft 5+1 guidelines?
Your answer: The role of supervisors: Benchmarking data showing disproportionate "success" of students should be reviewed, alongside the relationship and expectations of HEPs and supervised students.

The surveyed views of supervisors about particular programs and providers should be explored/benchmarked.

Benchmarking and outcomes should inform future reform.

APAC has noted the very low (in comparison) failure rates of psychology placements. These are issues being considered as part of a possible broadened approach to surveying placement supervisors and employers about graduate outcomes for triangulation against information provided by HEPs.