

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 Pharmacy Council

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 Australian Pharmacy Council (APC) supports the Board's preferred option to update the 5+1 guidelines to ensure they reflect contemporary requirements and provide clarity. Additionally, as the current iteration of the 5+1 guidelines has been in effect since 2013, the importance of revisiting the guidelines to ensure alignment with current practice and internship requirements is noted.
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: APC supports the inclusion of the revised Professional competencies for psychologists into the draft 5+1 guidelines. Including them in the guidelines will help provisionally trained psychologists prepare themselves for Australian registration and practice. It will also ensure the Board's transparency concerning the new professional competencies, coming to effect in December 1, 2025.
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: APC agrees with the proposed updated requirements for the 5+1 internship. Referring to Table 1 in the consultation paper (pages 5-6), we noted that while there is no change to internship and client contact hours, the requirement of 1360 supervised practice hours have been removed. We also note that this change is accompanied by the new streamlined individual supervision requirements, perhaps intended to replace the previous requirements – it may be beneficial and provide greater clarity if this is explicitly communicated. The responsibility has shifted to the Board approved supervisor who will, with the intern, determine the precise mix of activities and hours of supervised practice. We note that the introduction of the supervisor training program (supported by the Guidelines for Supervisors and the requirement for compulsory training via a Board-approved supervisor training provider) has given the Board the confidence to make this shift. It is noted that the Board's preferred option describes the potential benefits as an increase in flexibility for supervisors and interns without changing the minimum standards that ensure public safety. However, we also acknowledge that the Board will still continue to mandate the total internship hours and the hours of client contact. This will ensure the production of safe and qualified psychologists while avoiding excessive regulatory burden.

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: We do not have any specific content changes to suggest at this time. However, we suggest that the Board consider including a graphic or visual summary could also help clarify key points and enhance accessibility for readers.
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: APC did not find any specific issues with the language and structure of the proposed guidelines.
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: APC is in support of the Board's proposed transition plan and date for implementation. It is noted that communicating a transition plan early will help facilitate practitioner adaptation to the minor changes.
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: As the proposed updated guidelines reflect the updated Competencies, they are an important piece of information for the identified stakeholder groups to ensure they have a strong understanding of the requirements of the 5+1 internship program. They will support transparency and fairness. APC does not perceive any significant negative impacts on psychology practitioners and key stakeholder groups.
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: While the proposed changes aim to reduce administrative burden and modernise the 5+1 internship, there are some potential unintended effects for Aboriginal and Torres Strait Islander Peoples and other priority groups:

- Less structure may mean less consistency in how cultural safety is taught and practiced. With supervisors given more discretion, there's a risk that cultural supervision or training may be overlooked or undervalued.
- Removing case reports and specific training hours could reduce opportunities for provisional psychologist interns to reflect on culturally safe practice, especially when working with diverse or vulnerable communities.
- Cultural supervision is encouraged but not required, which may limit its uptake unless actively supported by workplaces and supervisors.

To avoid these risks, it is important that cultural safety remains a clear and visible priority in both training and supervision.

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:

APC has not identified any other benefits, costs or regulatory impacts other than what the Board has already described in the consultation paper.

Other

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

Your answer:

APC thanks the Board for providing this opportunity for us to review the proposed guidelines and provide our feedback.