

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: Provisional Psychologist Hub

Contact email: [REDACTED]

Provisional Psychologist Hub was founded in 2018 to support provisional psychologists to navigate their early career. At Provisional Psychologist Hub we are passionate about developing provisional psychologists' skills, knowledge, and confidence to allow them to meet the competencies of the Psychology Board of Australia (the Board) and ultimately obtain full registration. We have a team of board-approved supervisors and are board-approved supervisor training providers for master classes.

Provisional Psychologists Hub emulates the values of innovative practice, professional integrity, aspiration, people focused, ethical practice and accountability. We provide over 300 hours of board-approved supervision per week to provisional psychologists, psychologists and board-approved supervisors. As an organisation representing over 500 active provisional psychologists, most of whom are currently undertaking or preparing to undertake a 5+1 internship, as well as a network of 40 board-approved supervisors, we feel a strong responsibility to provide comprehensive feedback on behalf of our team and supervisees.

☐ 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.](#)

Australian Health Practitioner Regulation Agency
Psychology Board of Australia

GPO Box 9958 Melbourne VIC 3001 Ahpra.gov.au 1300 419 495

Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry, and psychology.

- ☐ 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.

Yes, we support an update to the 5+1 guidelines.

With more than ten years since the last review cycle, it is important that the guidelines reflect the current industry landscape and expectations. We have provided detailed feedback on the proposed changes, along with recommendations for the Board's consideration. Any changes to the 5+1 Internship Guidelines must be carefully considered in terms of their impact on current interns, those who have previously completed the internship program, and the future sustainability and integrity of the 5+1 pathway.

As one of only two remaining pathways for domestic students to achieve general registration as a psychologist—at a time when the profession is experiencing a workforce shortage—it is critical that the 5+1 pathway retains its credibility, rigour, and the strength of its outcomes. We must also ensure that any transition minimises the impact on the current cohort of graduating interns, while maximising the strength and integrity of general registration standard for employability and public safety.

The mental health of the Australian public depends on a strong, accessible, and competent psychology workforce. The 5+1 pathway provides not only essential workforce supply but also valuable real-world, practical experience that equips interns with the clinical readiness needed to meet community needs. This program must be preserved and valued as a vital component of the psychology pathway.

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.

Yes, provisional psychologists must be working towards the most current version of the Professional Competencies for Psychologists with consistent expectations across the profession.

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:

Please see below for areas of support and identified issues with the proposed changes.

Current Requirements	Proposed Requirements	Agree with Proposed changes	Reasons
1500 total hours	NO CHANGE: 1500 total internship hours	Yes	This volume of hours provides a strong consistent measure of time suited to achieving competency requirements provided this is

			balanced with a minimum volume of psychological practice that makes up the majority component of these hours.
1360 hours supervised practice	CHANGE: 1360 hours removed from guidelines	No	This proposed change poses a very high risk to the quality of the internship, with provisional psychologists likely undertaking significantly less psychological practice than previously. The wording in the proposed guidelines allows for a provisional psychologist to undertake 500 hours of client contact and then potentially only undertake education and training activities and supervision from there on.
500 hours of client contact	NO CHANGE	Yes	This provides a strong consistent measure of time suited to achieving competency requirements in a real-world environment.
80 Hours of supervision from a board-approved supervisor	CHANGE: 80 hours of supervision from a Board-approved supervisor <i>Minimum 50 hours must be individual supervision with the principal supervisor.</i> <i>The supervisor and provisional psychologist are to determine the most effective methods to complete the required supervision.</i> <i>80 hours of supervision equates to approximately 1 hour of supervision for every 18 hours of practice.</i>	No	We are in support of the proposed change where the supervisor and supervisee determine the most effective method of supervision. We do, however, foresee some issues with this, such as provisional psychologists not attending face-to-face supervision at all. We suggest a minimum requirement within the guidelines that guides supervisors and provisional psychologists on the expectation of attending face-to-face (in person or via videoconference). More parameters need to be advised for the frequency of supervision. The frequency of supervision needs to be defined so provisional psychologists are not practicing for periods of time without supervision. Weekly supervision is a recommendation within the guidelines; we suggest this be worded more strongly as a requirement. For provisional psychologists who identify as Aboriginal and/or Torres Strait Islander, does culturally informed supervision need to be provided by a board-

	<i>However, the frequency of supervision is determined by the supervisor.</i> <i>For those provisional psychologists who identify as Aboriginal and/or Torres Strait Islander, culturally informed supervision may be counted towards their 80 hours of total supervision.</i>		approved supervisor? This is not clear in the guidelines. If board approved supervisor registration is not a requirement can a framework for what is defining a culturally informed supervisor please be included within the guidelines including minimum education, minimum years of experience and current registration status, profession. On top of this framework what cultural competence training is required to be considered culturally informed? We recommend that it may be better served to make cultural competence training a requirement for board approved supervisors creating a consistent and culturally aware workforce nationally.
60 hours of professional development	CHANGE: Professional development changed to education and training activities CHANGE: Hours not prescribed by the Board	No	We are not in support of the change from Education and Training Activities terminology from the originally prescribed term professional development. This change is inconsistent with all other program guidelines, the Continuing Professional Development Registration Standard and the guidelines for Continuing Professional Development. We feel a seamless transition comes from having consistency in expectations and industry terminology between stages in the psychology pathway. Changing this across all policies, guidelines and standards would create an unnecessary burden on the board to administer all forms and guidelines to align. We are not in support of no hours being defined. A minimum number of required hours and a maximum number of education and training activities that can be counted toward the total internship hours needs to be specified, similarly to the way a maximum has been prescribed to working in research positions for a maximum of 200 hours. The risk associated with this change is related to education and training activities being counted towards the total 1500 internship hours. As per the proposed guidelines, a

			provisional psychologist could undertake 1000 hours of non-accredited informal education and training activities together with 500 hours of direct client contact and meet the total internship hours. Having such a low volume of practical experience presents a high risk to the safety to the public when provisional psychologists transition to independent practice once they have achieved general registration with this reduction of requirements.	
Direct Observation	CHANGE: No time frame attached to the observation requirements.	No	We note that in Table 1: Summary of proposed changes to 5+1 requirements (Public consultation, Updating the guidelines for the 5+1 internship program, May 2025) it was indicated that no change was occurring to direct observations which we have identified is not correct. Direct observations have had their minimum 6 monthly frequency removed from the 5+1 internship guidelines along with their board progress reporting requirements. This reduces the total volume of observations over time as well as preventing supervisors from mandating the completion of observations in the early stages of the program. Direct observation is a vital component of supervisor oversight during the internship, ensuring both the quality of services provided and the protection of the public. The current 5+1 internship guidelines specify that, at a minimum, the supervisor must observe the provisional psychologist conducting two psychological assessments and two intervention sessions every six months up to a maximum term of 5 years. These hours of direct observation are to be recorded in each six-month progress report. We recommend revising the proposed requirement:	

			From: "The supervisor must observe eight sessions in total including: • a minimum of four (4) assessment sessions; and • a minimum of four (4) intervention sessions" To: "The supervisor must observe eight sessions minimum including: • a minimum of four (4) assessment sessions; and • a minimum of four (4) intervention sessions. 50% of these observations must be completed in the first 750 hours of the internship, and 50% in the final 750 hours and every 12 months until completion" This approach ensures consistent oversight throughout the internship, particularly during the critical early and final stages of training. Early observations support the identification and correction of practice issues. Later observations ensure readiness for independent practice and demonstration competence. Structured and evenly distributed observation provides an important safeguard for the public, reinforces supervisor responsibility, and contributes to the overall integrity of the internship process.
Reporting			
Logbooks	CHANGE: Logbook submission requirements	Yes, with recommendations	There is a clearer outline of the details required for logbook requirements and their importance within the new guidelines. We recommend a review of the LBPP-76 form itself to make it more time-efficient for the provisional psychologist to complete. The logbook provides a strong record of practice and allows for recorded oversight of the internship program.

			In line with the recent release of the Code of Conduct, we propose that the Board's logbook template be updated to ensure that no client-identifiable information is collected.
Six-month progress reports	CHANGE: Progress reviews	No	Maintaining a six-month progress report with formally structured requirements and checks provides a range of critical benefits for both supervisees and the broader profession. Firstly, it ensures structured oversight by requiring formal review of progress at regular intervals. This not only helps to identify and address any issues early but also promotes a consistent approach to supervision across the sector. These reports support quality assurance and accountability by clearly documenting that supervision is occurring to the required standard. In doing so, they provide valuable evidence of compliance, which is particularly useful during audits or if something unexpected occurs—such as the sudden departure or unavailability of the supervisor overseeing the provisional psychologist. Importantly, the reporting process also acts as a risk management tool. It creates a paper trail of performance and concerns, making it easier to demonstrate due diligence should complaints or investigations arise—whether through AHPRA or internally. Furthermore, it encourages reflective practice, prompting provisional psychologists to assess their own development and engage meaningfully in professional reflection. Supervisors are also positively impacted, as the requirement to complete formal reports strengthens their engagement and encourages active, standardised evaluation of supervisee development. Regular formal reporting also

			supports ongoing professional development by helping provisional psychologists to develop the skills to receive and integrate feedback. It prevents complacency by ensuring progress is assessed rather than assumed and supports consistency in program standards, ensuring all supervisees are evaluated against common benchmarks. This helps avoid variability in supervision experiences and outcomes while providing a consistent and objective measure of progress across time and between supervisors. While we acknowledge the additional workload involved for the Board in reviewing and approving progress reports, we suggest there may be a way to reduce this burden without removing the value of structured progress checks. For example, aligning the report requirement with a milestone such as 50% completion of the prescribed psychological practice hours and every 12 months thereafter until completion — similar to the registrar program — could offer a more streamlined approach while maintaining oversight and quality assurance.
Case Reports	CHANGE: Case reports not required	No	Case reports are often used as an opportunity for board-approved supervisors to evaluate the provisional psychologist's ability to gather relevant client histories through a semi-structured interview, undertake assessments competently, develop a case formulation, accurately interpret and provide a diagnosis, develop a treatment plan and execute an intervention with a client. Through case reports, many practice issues are identified in intervention and assessment of clients. They are an opportunity to develop reflection and improve psychological practice. We support the removal of the

			Board's marking requirements. We understand the motivation to remove the administrative burden on the Board, however we propose to retain the case report tasks within the internship as a board-approved supervisor-assessed task.
Final assessment of competence	NO CHANGE	Yes	This is an important step in the record of competence, the fact that it was achieved, who approved it and how it was achieved.
Administrative Requirements			
Approval of work role and internship plan by the Board	NO CHANGE	No	We agree with having the Board approve work roles for the internship in conjunction with the board-approved supervisor. This ensures a consistent and transparent approval process and supports a national record of workplaces hosting provisional psychologists across Australia. However, we recommend streamlining the process by transitioning to a format more closely aligned with the AWOP-76 form. Many provisional psychologists gain experience across multiple roles and settings throughout their internship in order to achieve the full range of required competencies. The current INPP-76 form, with its level of detail and the time it takes to process, can create delays and act as a barrier to workforce flexibility and progression. Benefits of a simplified, one-page form include: Increased flexibility: provisional psychologists would have greater opportunity to work across a variety of roles and settings, even if each individual role does not independently allow for the achievement of all competencies. Competence is developed across time and through cumulative experiences. Improved responsiveness to

			workforce needs: Simplifying the process supports timely workforce entry and adaptability to role changes, particularly in rural, regional or high-demand areas where service coverage is needed most. • Reduced administrative burden: A shorter form focused on essential details would ease the administrative load for provisional psychologists, supervisors, and the Board—while still ensuring oversight and role suitability. • Ongoing Board oversight maintained: The Board would continue to receive necessary information to confirm that provisional psychologists are working under supervision and in appropriate roles, while also retaining a clear national record of placements. We propose replacing the INPP-76 with a brief, targeted form that maintains accountability without impeding flexibility, ensuring the process is fit for purpose in a modern, diverse psychology workforce.
Minimum time to complete: 44 weeks	NO CHANGE	Yes	We have observed that 44 weeks is a sufficient minimum term to achieve a high standard of competence.
Maximum time to complete: 5 years	CHANGE	No	We have observed a range of challenges that require the maximum term to complete the internship. This is a strong limit for flexibility. The Table 1: Summary of proposed changes to 5+1 requirements (Public consultation, Updating the guidelines for the 5+1 internship program, May 2025) states the maximum timeframe of 5 years. The INPP-76 form states within 5 years of beginning provisional registration. However, within the proposed guidelines, it states,

			'while there is no maximum timeframe for completion, applicants must meet the requirements of the Recency of Practice standard.' This needs to be updated to reflect the correct timeframes for completion.
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 ?			
We have outlined by relevant section our recommendations for changes, deletions and additions to the draft 5+1 guidelines. 2.1 Entry into the 5+1 internship program We support the requirement that the internship program formally begins only upon Board approval of the INPP-76 form, rather than allowing provisional psychologists to commence client-related practice as stated in the current 5+1 Internship Guidelines. This approach ensures appropriate oversight and alignment with the regulatory framework and makes it clear for provisional psychologists undertaking an internship when they should be commencing. It is also consistent with the approval process for all other program guidelines. However, we hold concerns regarding the timeliness of INPP-76 approvals and the potential impact this may have on the workforce. Delays in the approval process can result in significant disruptions to work roles, limiting provisional psychologists' ability to begin or continue in roles they have secured. We agree that Board approval of internship work roles, in collaboration with a Board-approved supervisor, is a critical safeguard. This ensures consistency and transparency in the approval process and supports the development of a national record of organisations and settings hosting provisional psychologists. Nonetheless, we recommend a streamlined approach that aligns more closely with the AWOP-76 form. Many provisional psychologists gain their experience across multiple settings and roles to meet the full scope of required competencies. The current INPP-76, due to its complexity and level of detail, often results in administrative delays and inhibits flexibility in workforce participation. We propose replacing the INPP-76 with a simplified, one-page form that captures the essential information required for the Board oversight, while facilitating more timely and flexible workforce engagement. The benefits of this approach include: • Increased flexibility: Provisional psychologists would be able to work across various roles and settings, recognising that not every individual role must independently meet all competencies. Competency development is cumulative and occurs over time across diverse experiences. • Improved responsiveness to workforce needs: A more agile system supports timely placement in roles, particularly in rural, regional, or high-demand areas where service delivery is most needed. • Reduced administrative burden: A concise form would reduce workload for provisional psychologists, supervisors, and the Board, without compromising oversight.			

- Ongoing accountability and oversight: The Board would continue to receive adequate information to confirm appropriate supervision and role suitability, maintaining a national record of placements and compliance with program standards.

In addition, we recommend that the revised form include a proposed commencement date, with two options:

- A specific start date, with a minimum 30-day lead time, suitable for those applying with ample notice and seeking to coordinate internship commencement with planned employment;
- An option to commence at the earliest possible date upon Board approval, ideal for those seeking the most expedient entry into the internship program.

Including these options would help prevent premature internship approvals while also allowing for timely onboarding where needed. This balance between structure and flexibility ensures the approval process supports both individual and workforce needs.

Additional Recommendation – Transition from Working in Addition to Placement into an Internship

We recommend that the guidelines clearly state what occurs for provisional psychologists undertaking a working in addition to placement program who transition into their internship year in the same role.

We propose the following addition:

“For those provisional psychologists undertaking a working in addition to placement program, they may continue to undertake practice in line with this program. However, hours of practice cannot be logged toward the internship until the INPP-76 form is approved.”

We believe that facilitating a smooth transition from one Board-approved program into the next will support greater uptake of the working in addition to placement model. This model provides a solid foundation and a gentler entry into practice, easing provisional psychologists into the increased responsibilities and requirements of the 5+1 internship year.

3.5.1 Logbooks

The proposed guidelines state “failure to maintain an accurate logbook may result in the Board not recognising a period of supervised practice and/or initiating an investigation into the professional conduct of the provisional psychologist and the supervisor”. However, there is no information about how logbook issues could be identified, there are no mechanisms in place for checking that logbooks are being completed, and no information is stated about the possible outcomes. Further, there is a statement “If Ahpra requests the logbook, it must be submitted to Ahpra within 14 days of the request.” However, there is no indication of the likelihood or frequency of the requests, whether a provisional psychologist may be randomly selected for this or whether it is in response to concerns. Within the proposed 5+1 guidelines, there are no quality assurance processes in place. We would like to see the addition of the Board’s clinical governance processes and procedures in relation to this.

The updated Code of Conduct places a strong emphasis on confidentiality, and as such, it is timely and appropriate to review the current logbook template to ensure compliance with these expectations. Removing any requirement or prompt that could lead to the inclusion of client information in logbooks will strengthen ethical practice.

Furthermore, we recommend a broader review of the current logbook structure with the intention of simplifying the process and reducing the administrative burden placed on provisional psychologists and their supervisors. While accurate tracking of practice activities remains essential, the existing format is often time-consuming and, in some cases, duplicative.

We support the development of a revised template that captures only essential information. A more efficient, standardised logbook would also reduce the likelihood of errors or omissions.

3.5 Reporting Requirements

More information needs to be provided on the process of information being requested by the Board. The proposed 5+1 guidelines state that the Board can request submission ‘at any time’. There is no indication

of the frequency of these requests; do they occur regularly, are they random, are they rare, or are they in response to a complaint? Within the proposed 5+1 guidelines, there are no quality assurance processes in place. We would like to see the addition of the Psychology Board of Australia's clinical governance processes and procedures in relation to this.

3.5.3 Progress Reviews

There is no information on minimum standards to guide board-approved supervisors on the expectations of progress reviews. There is no guidance provided on the frequency and format expected for board-approved supervisors. We foresee these creating challenges due to the subjectivity and differences between board-approved supervisors. Eliminating the structure of the internship program leaves provisional psychologists' internships at significant risk should their board-approved supervisor not undertake the progress reviews at a minimum frequency. The power imbalance sits disproportionately higher with the board-approved supervisor under the proposed 5+1 guidelines. We foresee significant challenges with provisional psychologists' inability to change principal supervisors or have autonomy over their internships, as they will have no documentation tracking the progress of their internship.

While we acknowledge the additional workload involved for the Board in reviewing and approving progress reports, we suggest there may be a way to reduce this burden without removing the value of structured progress checks. For example, aligning the report requirement with a milestone such as 50% completion of the prescribed psychological practice hours and every 12 months thereafter until completion — similar to the registrar program — could offer a more streamlined approach while maintaining oversight and quality assurance.

3.7 Timeframes for completion

Table 1: Summary of proposed changes to 5+1 requirements (Public consultation, Updating the guidelines for the 5+1 internship program, May 2025) states the maximum timeframe of 5 years. The current INPP-76 form states within 5 years of beginning provisional registration. However, within the proposed guidelines, it states 'while there is no maximum timeframe for completion, applicants must meet the requirements of the Recency of Practice standard.'

This needs to be updated to reflect the correct timeframes for completion.

4. Psychological Practice for the 5+1 Internship

There is no minimum psychological practice hours per week stated within the guidelines. As per the current INPP-76 a minimum of 17.5 hours per week needs to be added to the proposed guidelines.

4.4 Client Contact

There is a significant risk identified with the undefined client-related hours. We propose that this change would be better stated as psychological practice hours required (client contact + client-related), with a minimum of 500 client contact hours. The wording in the proposed guidelines allows for a provisional psychologist to undertake 500 client contact hours and then potentially only undertake education and training activities and supervision from there on. This poses a very high risk to the quality of the internship, with provisional psychologists likely undertaking substantially less psychological practice than previously. This is further compounded by the absence of minimum hours of psychological practice per week.

The current version of the 5+1 guidelines (June 2017) creates confusion with no minimum client-related hours stated, however, the expectation communicated from the Board is that 860 client-related hours are required. The current wording in the guidelines is open to interpretation as to whether a provisional psychologist who has over the minimum 500 hours of client contact can continue to count the additional client contact hours towards their overall internship hours. For example, a provisional psychologist who is in a client-facing role with higher client contact hours, 700 hours of client contact + 660 client contact hours, meets the 1360 internship hours and is arguably more experienced. To date, there has been mixed feedback on this with some provisional psychologists obtaining their general registration while others being told they need to continue in their internship until they have a minimum 860 client-related hours. We suggest this confusion be addressed rather than the client contact hours being removed from the proposed guidelines.

The proposed changes are very concerning, given the lack of clarity. We strongly encourage this requirement to be amended in the proposed guidelines to be more in line with the need for provisional psychologists to be engaging in psychological practice. We strongly recommend that this be stated more clearly to avoid confusion and laxness in provisional psychologists applying the definition of client-related activities. We consider this change to create increased risk to the public.

4.1.3 Simulated client contact

Simulated client contact appears more appropriately categorised as an Education and Training Activity/professional development. This is because such contact does not involve interaction with real clients in psychological practice, and therefore lacks the complexity, unpredictability, and ethical considerations inherent in real world psychological practice. Instead, it serves as a structured learning tool designed to develop and assess skills in a controlled environment. The primary purpose is educational—enhancing competence through practice and feedback—rather than delivering psychological services. As such, it aligns more closely with the goals and characteristics of Education and Training Activities as outlined in the internship guidelines.

5.4 Supervision provided during the 5+1 internship

More parameters need to be advised for the frequency of supervision attendance. While there is a recommendation stated for weekly supervision within the guidelines; we suggest this be worded more strongly as a requirement. The frequency of supervision needs to be defined so provisional psychologists are not practicing for periods of time without supervision. The wording of 'regular direct supervision for the entire duration of the program' is open to interpretation and subjectivity of the board-approved supervisor and provisional psychologist.

There is no expectation stipulated to monitor a 1:18 supervision to practice ratio, which raises a number of concerns. Typically, given the financial costs associated with supervision, provisional psychologists will attend the minimum required supervision hours. This is not reflective of the supervision they need to undertake their role, the amount of hours they are working or the level of support they need. Without a supervision to practice ratio, board-approved supervisors will have increased supervisory responsibility to manage within the minimum amount of time. For example, someone working in an approved work role of 38 hours per week and only attending 1 hour of supervision per week, there is not enough supervision time to sufficiently oversee their work role or internship. We foresee this creating challenges, conflicting expectations between supervisors and provisional psychologists and putting the onus on board-approved supervisors to make up the shortfall in their own time.

Secondly, we foresee concerns when a provisional psychologist meets all their hours of psychological practice but is not ready to submit a final assessment of competence report. For example, 80 hours of supervision have been completed, but the provisional psychologist has not yet passed the NPE. With the current wording of the guidelines, the provisional psychologist would be able to practice without supervision until the final assessment of competence needs to be completed. This may allow provisional psychologists to practice without supervision for an undetermined period of time.

Without clear expectations of supervision, attendance frequency and supervision to practice ratio the risks to client care significantly increases. This is further compounded by the proposed guidelines not stating a maximum timeframe a provisional psychologist can practice without engaging in supervision with their principal supervisor. We consider this change to create increased risk to the public.

5.4.2 Direct observation and 5.4

We recommend revising the proposed requirement:

From:

"The supervisor must observe eight sessions in total including:

- a minimum of four (4) assessment sessions; and*
- a minimum of four (4) intervention sessions"*

To:

"The supervisor must observe eight sessions in total including:

- a minimum of four (4) assessment sessions; and*
- a minimum of four (4) intervention sessions.*

50% of these observations must be completed in the first 750 hours of the internship, and 50% in the final 750 hours and every 12 months until completion."

This approach ensures consistent oversight throughout the internship, particularly during the critical early and final stages of training.

- Early observations support the identification and correction of practice issues before they become entrenched.
- Later observations ensure readiness for independent practice and reinforce accountability at the conclusion of the internship.
- Structured and evenly distributed observation provides an important safeguard for clients, reinforces supervisor responsibility, and contributes to the overall integrity of the internship process.

5.4.6. Offsite supervisory arrangements

The Board expects that the principal supervisor is onsite at the provisional psychologist's main place of practice. This expectation is in contradiction to the Code of Conduct, which discourages multiple relationships, where possible. Many employers are preferring to move supervision to external providers to remove the multiple relationship that exists and reduce costs to their business. We suggest removing the expectation that the principal supervisor is onsite. Further, we suggest removing the requirement of an additional letter at the time of INPP-76 submission to approve an off-site supervisor. We propose adding a section to the INPP-76 form as per question 9 in the AWOP-76, indicating the person available onsite at the provisional psychologist's practice location to provide support and guidance.

6.1 Availability of supervisors

There is no stipulated length of time the provisional psychologist can work in their approved work role without supervision from their principal supervisor. There is no expectation stated, therefore posing the question, how can a principal supervisor sign off on the final assessment of competence form if they have not undertaken supervision with the provisional psychologist in weeks or months?

6.2.1 Change of Principal Supervisor

The proposed guidelines state, 'the outgoing principal supervisor must provide details of all supervision to date through the CHPS-76 form (within 14 days of the end of the supervisory arrangement), to provide adequate opportunity for independent comment if the two parties disagree on any aspect of the information provided. Both the supervisor and the provisional psychologist must sign the completed CHPS-76 form'.

This section needs more clarity and direction about what to do if the two parties disagree. It does not make sense for either party to sign a document they do not agree with.

6.7 Psychological Practice outside the 5+1 internship

We suggest the Board consider a statement about engaging in psychological practice outside of the approved work role while completing an internship. We welcome clarification on the Board's stance on provisional psychologists working in roles such as counsellors, therapists, therapy assistants or similar, where their work involves intervention, treatment or assessment of clients not under the provisional psychologist title.

7.1.2 Extended Leave

We suggest the requirement that a CHPS-76 form be completed by the board-approved supervisor when a provisional psychologist is going on extended leave to ensure continuity, oversight, and accountability in the internship. Requiring the form to be completed—even if not always submitted to the board—serves several purposes:

- Maintains internship oversight: It ensures the supervisor has formally acknowledged the interruption to the internship and has considered how the leave will impact the provisional psychologist's schedule and learning progression.

- Provides a clear record: Documenting extended leave through the CHPS-76 form creates an official record that can support timeframes and internship extensions. This is particularly useful if issues arise later regarding internship duration or compliance.
- Supports return planning: Even if the form is not submitted immediately, having it completed helps facilitate a smoother transition back into the internship. It provides a reference point for both the provisional psychologist and the supervisor to review competencies, and timelines upon return.
- Ensures consistent practice: Standardising the use of the CHPS-76 form in cases of extended leave creates a consistent national approach, reducing ambiguity and supporting alignment with good governance principles.

This approach balances administrative efficiency with the need for proper record-keeping and internship integrity. There is no guarantee that when a provisional psychologist returns from leave the supervisor that they have now will be available when they return and adding this requirement will ensure that there are less issues with supervisees being unable to obtain a CHPS-76 form when they do return. We have had this process in place for a number of years.

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?

There is no opportunity to review the proposed supporting material, specifically the fact sheets and updated/ revised forms. The previous fact sheet dated 1 June 2017 continues to be overlooked by supervisors and provisional psychologists. We recommend that any content within the fact sheets be contained within the guidelines. The use of an additional 5 documents will likely be missed and create confusion.

There is some ambiguity and conflicting information within the guidelines that we have raised in question 4.

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?

From our review of the proposed guidelines and consultation documentation, we cannot identify any implementation plan. From our review, the implementation plan is solely reliant on board-approved supervisors becoming familiar with the revised guidelines.

- It is not stated how board-approved supervisors will be upskilled and trained to oversee the new guidelines.
- It is not stated how the information about the updated guidelines will be disseminated to board-approved supervisors or provisional psychologists.
- It is not stated whether provisional psychologists currently in an approved internship program will be required to transition. Specifically, once the updated 5+1 guidelines come into effect on 1st December 2025, will the previous guidelines no longer be relevant, and all 5+1 provisional psychologists will transition to the new guidelines?

We welcome a clear implementation plan with training and upskilling for board-approved supervisors planning to supervise the 5+1 internship pathway.

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.

It is vital that the standard of professional competence expected of generally registered psychologists is consistently upheld across all registration pathways. The 5+1 internship must remain aligned with the standards achieved through the six-year higher education sequence, to avoid devaluing the internship route or undermining the competence of those who have and continue to complete it. Damage to the perceived rigour of the internship pathway could negatively affect the reputation, employability, and scope of practice for thousands of psychologists who have completed or are currently completing this pathway. Any change to the framework must therefore be implemented cautiously, with consideration for both its long-term reputational impact and its implications for professional parity and public confidence.

Please find following the summary of potential impacts we feel the board should be aware of if the proposed 5+1 guidelines were to be approved.

Summary of Identified Risks with the Proposed 5+1 Guidelines

Removal of Case Report Submission

Risk:

- No Board-assessed case reports means that the board loses a key tool to independently verify a provisional psychologist's ability to integrate theory, assessment, intervention, and reflection.

Consequences:

- Increased reliance on subjective supervisor judgement without a standardised assessment
- Inconsistent evaluation standards across internships
- Weakened assurance of applied competence for general registration

Reduced Reporting Requirements

Risk:

- Progress reports are no longer submitted to the Board (unless requested).

Consequences:

- Limits the Board's ability to monitor intern progress, detect early issues, or intervene in struggling internships
- Creates a reactive rather than proactive regulatory approach
- Higher incidence of formal notifications to the regulatory body for provisional psychologists

No Minimum or Maximum Hours for Education and Training Activities

Risk:

- The proposed guidelines give full discretion to supervisors with no minimum threshold.

Consequences:

- Risk of under-training in essential professional skills (e.g., cultural safety, ethics, evidence-based practice)
- Enables provisional psychologists to use education and training activities in lieu of real client experience towards their internship hours
- Varies widely depending on supervisor engagement and provisional psychologist motivation

Supervisor Oversight Burden

Risk:

- More responsibility is placed on principal supervisors to assess competence without structured processes.

Consequences:

- Increased pressure and liability on supervisors
- Increased subjectivity across the internship pathway
- High variability in the competence of 5+1 trained psychologists
- Greater potential for inconsistent competence judgments
- Risk of supervisor bias or insufficient training

Ambiguity in Supervision Frequency

Risk:

- The frequency of supervision is not clearly prescribed.

Consequences:

- Insufficient supervision and poorly managed internships
- Less clarity for provisional psychologists and supervisors about minimum expectations
- Highly variable expectations across board-approved supervisors

Risk of Inadequate Logbook Monitoring

Risk:

- Logbooks are not routinely submitted, only on request.

Consequences:

- Allows non-compliance to go undetected
- Removes a regular accountability mechanism for provisional psychologists and supervisors

Risk of Program Reputation

The gap between training in psychology is widening, and the proposed 5+1 guidelines perpetuate the divide between endorsed psychologists and general psychologists. If adopted without strong implementation safeguards and supervisor training, these changes could lower regulatory control and make internship quality highly variable.

Risk:

- 5+1 Internship considered to be a lower standard of competence

Consequences:

- Diminished credibility of the program within the industry
- Loss of confidence from the public in generally registered psychologists
- Challenges in graduate and generally registered psychologist employability, with employers viewing this standard as a reduced level of competency to other psychologists

Risk of Inadequate Observation of Practice

Risk:

- Not undertaking any direct observation of practice until the end of the program

Consequences:

- Delayed detection of performance issues or skill gaps
- Inadequate preparation for independent practice
- Inconsistent or insufficient feedback for provisional psychologist growth

Supervision to Practice Ratio

- Risk: Changing the supervision to practice ratio to 1:18 from 1:17 high cost and little benefit.

Consequences:

- Provisional psychologists currently undertaking their internship program will have inaccurate supervision to practice ratios from 1st Dec 2025.
- Logbooks for provisional psychologists undertaking the current internship will be inaccurate
- All mechanisms for tracking supervision to psychological practice will need updating.
- Directions from the Board to maintain the current supervision to practice ratio will be outdated creating confusion by the provisional psychologists who have been advised to rectify this.
- All Board communication states a 1:17.5 ratio which is inaccurate
- This will be the third change to the supervision to practice ratio without any benefit

Risk of Delayed Approval of Internship Commencement

Risk:

- Protracted INPP-76 processes result in delays in internship commencement

Consequences:

- Delayed commencement
- Delayed completion
- Loss of employment opportunities
- Increased stress and dissatisfaction
- Loss of income
- Disruption to workforce planning
- Loss of confidence in the program's reliability
- Reduced willingness to host future provisional psychologists – this is something we have already observed in the reduction of work roles being made available to provisional psychologists

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).

We have not provided a response to this question. We are in support of feedback provided by the Aboriginal and Torres Strait Islander Peoples who are affected by the proposed guidelines.

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).

Yes, we identify several additional benefits, costs, and regulatory impacts for practitioners, clients/consumers, and other stakeholders arising from the proposal, particularly in reference to Appendix B, section 3(d) regarding costs.

There are significantly reduced financial costs to the Board due to the lowered administrative burden introduced by the proposed changes. However, the reporting requirement changes within the proposed 5+1 guidelines result in a substantial shift of responsibility and burden onto board-approved supervisors. Supervisors are expected to carry greater risk for comparatively less financial compensation. Notably, the guidelines remove critical safeguards such as a supervision-to-practice ratio, mandatory progress reporting, and minimum attendance requirements. As a result, board-approved supervisors may be held fully accountable for the provisional psychologist's psychological practice while having fewer structured supervision hours to support oversight. We strongly disagree with the assertion in the consultation paper that "there may even be reduced costs for supervisors due to the reduced administrative burden."

In terms of cost to stakeholders, a significant impact arises from delays associated with the INPP-76 form approval process, which currently ranges from 4 to 12 weeks. By simplifying and streamlining this form—while preserving the critical requirement of approval before commencement—we can expedite the administrative process substantially. This improvement would reduce operational costs for the Board and

provide clear financial and community benefits to provisional psychologists, practice employers, and the public, ensuring timely service delivery and swift entry into the workforce.

Within the proposed guidelines, we identify a significant regulatory impact due to the absence of clear quality assurance checkpoints. The increased onus placed on the supervisor, combined with the lack of informal review mechanisms, may lead to a rise in notifications to the Board. Without embedded learning and feedback opportunities, concerns that might otherwise be addressed through supportive development are more likely to escalate into formal complaints. This shift may undermine both the supervisory relationship and the intent of professional growth.

Other

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

Being a Board-approved training provider and an experienced supervision provider to provisional psychologists, we are very concerned about the autonomy and responsibility proposed to be given to principal supervisors within the proposed guidelines.

There are no avenues stated for Board-approved supervisors to report any practice or internship concerns. The only proposed contact with the Board is at commencement and completion.

The current Board-approved supervisor training does not equip Board-approved supervisors with the knowledge, skills, or confidence to assess the competence of provisional psychologists. With the reduction of tasks required, the onus on the Board-approved supervisor to assess competence with their own subjectivity reduces the quality of the internship program. Training, upskilling and guidance for Board-approved supervisors on competency-based assessment needs to be considered. The proposed guidelines change the role of the Board-approved supervisor from overseeing the internship program to being responsible for ensuring the provisional psychologist achieves the professional competencies. This is a significant change in language within the proposed guidelines and the responsibility placed on Board-approved supervisors.

Proposed Solutions and Recommendations

We feel it is important to put forward some possible solutions to the identified challenges. The Board may consider the following suggestions:

Competency Assessment Tools

- A Psychology Board of Australia developed competency portfolio template to collect evidence of competencies being achieved throughout the internship, submitted at final assessment of competence.
- A Psychology Board of Australia developed benchmark template with descriptions of examples indicating competency or developing competency to assess provisional psychologists' progress against.
- Require submission of a reflective summary of two significant cases with Board-approved supervisor sign-off, submitted at final assessment of competence.
- The four case reports remain a task within the 5+1 guidelines, submitted to the Board-approved supervisor, with the final version submitted together with the final assessment of competence form to the Board as evidence of completion.

Progress Monitoring and Reporting

- Reinstate mandatory progress reports, with a changed frequency of at 50% of the completed required practice hours and every 12 months thereafter until completion.
- Require Board notification (and a clear avenue to undertake this) if a provisional psychologist is not meeting developmental benchmarks or other red flags are identified.

Supervision Requirements

- Clearly state expectations of supervision attendance and frequency within the guidelines to enable Board-approved supervisors to implement these.
- Remove Section G from the INPP-76, thereby simplifying and fast-tracking the approval and commencement process for the internship program.
- Remove the expectation that the principal supervisor is onsite at the provisional psychologist's main place of practice. This contradicts the Code of Conduct, which discourages multiple relationships. Instead, add a section to the INPP-76 form (as per question 9 in the AWOP-76) indicating the person available onsite at the provisional psychologist's practice location to provide support and guidance.

- Reintroduce a time frame for direct observations of practice, such as 50% of observations completed in the first half of the program and 50% in the second half, with at least one observation every 12 months.

Practice Hours and Direct Client Contact

- States hours of psychological practice, with a minimum of 500 direct client contact hours, needs to be introduced into the proposed 5+1 Internship Guidelines. This ensures that real-world psychological practice is the cornerstone of the internship.

Supervision Quality and Frequency

- Include a minimum requirement for attending face-to-face (in person or via videoconference) supervision sessions. This will avoid supervision being completed solely via phone or focused only on document review. It needs to be a collaborative experience that encourages reflexivity.
- Provide clear parameters for the frequency of supervision. While weekly supervision is a recommendation, it should be strengthened as a requirement.
- Include a stronger definition of cultural competence supervision and specify who is eligible to provide this (with minimum eligibility requirements), or alternatively require supervisors to undertake cultural competence training.

Professional Development and Documentation

- Reinstate Professional Development requirements with both minimum and maximum hour limits.
- Review the LBPP-76 form to make it more efficient for provisional psychologists to complete. Update the logbook template to remove client-identifiable information and align with the revised Code of Conduct.
- Ensure that all fact sheets are integrated into the new 5+1 Internship Guidelines to avoid oversight.

Process Improvements and Implementation

- Include a proposed commencement date in the revised form, with two options provided.
- Clearly state what occurs for provisional psychologists transitioning from a placement to an internship year in the same role. Suggested addition:
“For those provisional psychologists undertaking a working in addition to placement program, they may continue to undertake practice in line with this program. However, hours of practice cannot be logged toward the internship until the INPP-76 form is approved.”
- Reintroduce minimum weekly psychological practice hours, set at 17 or 17.5 hours per week.
- Classify simulated client contact as an Education and Training Activity / Professional Development, not direct practice.
- Retain the 1:17 ratio to maintain sufficient oversight and avoid unnecessary disruption to the current cohort of provisional psychologists.
- Include a stipulated time limit that a provisional psychologist can work in their approved role without supervision from their principal supervisor.
- Require that a CHPS-76 form be completed by the Board-approved supervisor when a provisional psychologist goes on extended leave.
- We welcome a clear implementation plan with training and upskilling for Board-approved supervisors planning to supervise the 5+1 internship pathway.