

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: Master of Professional Psychology Course Coordinators Network

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: Yes, we support Option 2. The current 5+1 internship guidelines are due for review, and this proposal reflects an effort to modernise and streamline the training model. We particularly welcome efforts to reduce administrative burden, which has been reported by interns and supervisors alike as overly onerous and at times a barrier to effective clinical learning. However, while reduced reporting is a welcome change, it is critical to acknowledge the associated reduction in oversight. The guidelines would benefit from incorporating mechanisms that counterbalance this reduction, to ensure the continued protection of clients and the development of competent practitioners.
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, aligning the 5+1 internship model with the updated competencies is a necessary and positive step. This ensures consistency across pathways to registration and improves clarity around expectations for provisional psychologists. It also strengthens the link between training and contemporary psychological practice.
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: We partially agree. There are several commendable changes aimed at flexibility and efficiency. However, we raise the following key concerns: • The removal of a minimum requirement for professional development (PD) is concerning. Minimum PD hours ensure interns remain engaged in structured learning beyond supervision and clinical work. While supervision is a form of PD, it does not replace the need for targeted training in specific therapeutic modalities or assessments. The absence of a minimum may place interns at risk of missing critical development opportunities and can exacerbate power imbalances in employer-supervisor relationships. • The removal of minimum professional development (PD) requirements is inconsistent with the expectations for ongoing learning and development that underpin general

registration. Ideally, the guidelines should explicitly encourage internship employers—particularly where interns are receiving entry-level wages—to provide support for their professional development. • The shift of logbook and progress review submission to supervisor-only oversight is appropriate and reflects practices in other training pathways. However, eliminating mandated timing or frequency of reviews entirely is not advisable. At minimum, progress reviews should be required at the midpoint and end of the internship to support development and identify areas of concern early. • The proposed removal of case reports entirely may undermine skill development in evidence-based practice. Even if not submitted to the Board, we suggest retaining one assessment and one treatment case report as part of the intern’s training requirements.
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 recommend: • Reinstating a minimum PD hour requirement, even if not submitted to the Board. • Requiring at least two formal progress reviews during the internship. • Retaining a requirement for one assessment and one treatment case report. • Considering a mechanism for minimal oversight of internship employers, such as a register of approved internship providers or a declaration form regarding employment arrangements to protect the interests of the intern.
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: The structure and language appear clear and workable. The shift from “professional development” to “education and training activities” is a helpful reframing. However, there may be unintended consequences of leaving key activities (such as progress reviews) completely at the discretion of supervisors, particularly in contexts where dual relationships (e.g., supervisor/employer) may limit open feedback.
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:

Yes, we support this timeline. It allows sufficient time for provisional psychologists, supervisors, and internship providers to prepare. Clear communication and guidance will be essential to ensure a smooth transition.

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:

Positive impacts include reduced administrative burden and a clearer alignment with other training pathways. However, the Board should be aware of:

- The risk of diminished oversight and support for interns in complex or unsafe workplace contexts.
- The lack of reporting or monitoring mechanisms for internship providers/employers.
- The limited visibility of intern-reported concerns about supervisors, which were not addressed in the consultation paper but are relevant to understanding the overall safety and quality of the internship system.

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 specific to these groups. However, removing regulatory safeguards (e.g., mandated PD or review points) may disproportionately affect interns from priority groups who are more likely to be placed in under-resourced settings or vulnerable supervisory arrangements.

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:

Benefits include reduced burden for supervisors and provisional psychologists and increased efficiency in internship administration. Costs may arise if reduced oversight

leads to inconsistent intern experiences, diminished skill development, or increased risk to client safety. Minimal regulatory steps—such as setting baseline requirements for employers—could mitigate this risk without introducing new administrative burdens.

Other

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

Your answer:

The proposed revisions show promise in modernising the 5+1 pathway. However, we urge the Board to give more attention to the role and responsibilities of internship employers, and to consider safeguards that address the power differentials between interns and their supervisors/employers.