

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 Psychological Society**

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 Psychological Society (APS) supports the process of reviewing and updating the 5+1 guidelines to ensure alignment with contemporary practice standards and regulatory consistency. However, several critical concerns raised during the preliminary consultation remain unresolved in the May 2025 version. While the May 2025 guidelines retain the 500-hour minimum for client contact and incorporate a welcome focus on culturally responsive supervision and equity, the following issues persist: • The six-month progress review remains non-mandatory. • There is still no minimum requirement for education and training (formerly professional development). • The case study requirement has not been reinstated. These omissions reduce consistency, undermine quality assurance, and risk variability across internship experiences. We urge the Board to reconsider these decisions to safeguard the integrity of the internship program and ensure adequate oversight.
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. The APS supports the inclusion of the updated <i>Professional Competencies for Psychologists</i> in the 5+1 guidelines. These competencies offer a clearer and more contemporary framework for safe, ethical, and effective practice. They enhance alignment between training pathways and support the goal of national consistency in standards for general registration.
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 APS agrees with some of the changes in Table 1, particularly the retention of 1,500 hours of psychological practice and 500 client contact hours, and the new inclusion of culturally informed supervision practices. However, we do not support: • The continued absence of a minimum requirement for education and training hours. • The non-mandatory status of the six-month review. • The failure to reinstate the case study requirement as it is an important and necessary skill for psychologists to be able to articulate and discuss a case. These changes reduce accountability and diminish the structure that has helped ensure quality and safety in the internship year. The removal of the requirement for case studies based on anecdotal feedback is concerning. The focus that supervisors place on supporting supervisees to meet this requirement forms an essential component of effective and efficient training and competency development. The focus on case studies therefore is relevant through the internship as the ability to produce a high-quality written report is an essential and core skill for psychologists. In addition, good educational practice supports regular reviews. Retaining the formal 6-month review process will ensure that this requirement is adhered to and engaged in for the educational merit that it provides.

The APS recommends the Board adopt a more balanced approach that preserves flexibility while maintaining key minimum 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:

Yes. The APS recommends the following additions to strengthen training consistency and oversight:

- Reinstate a mandatory six-month progress review.
- Introduce a minimum requirement for education and training hours.
- Reintroduce the case study requirement to ensure proficiency in communication and documentation—critical competencies in ethical psychological practice.

These changes are essential for maintaining a robust, structured, and quality-assured training pathway.

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 language and structure of the draft guidelines are generally clear and accessible. However, several issues warrant attention:

- The shift from "professional development" to "education and training" is not clearly defined and may introduce ambiguity.
- The removal of the reference to the scientist-practitioner model risks deprioritising evidence-based practice as a core training and practice philosophy.

Clarifying these elements would help ensure the guidelines are interpreted consistently and implemented effectively.

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:

No. The APS recommends a delayed implementation date of 1 December 2026. This is necessary to:

- Allow supervisors, provisional psychologists, and education providers time to update practices, resources, and placements.
- Accommodate concurrent major changes such as the new Code of Conduct and updated competencies.
- Ensure the APS and other relevant stakeholders can develop appropriate training and support materials in a timely manner.

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:

Yes. The revised guidelines shift significant responsibility from the regulator to supervisors and provisional psychologists. Without clearer minimum standards (such as mandated professional development/education and training hours and case study requirements), this change risks:

- Inconsistent supervision quality.
- Variability in internship experiences and outcomes.
- Increased pressure on higher education providers and employers to ensure interns are adequately prepared and supported.

This may also reduce employer confidence in early-career psychologists' readiness for independent practice.

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:

The inclusion of culturally informed supervision and a health equity approach is a positive and necessary development. However, the broader weakening of structural oversight—such as removing mandated PD hours—may inadvertently disadvantage interns working in under-resourced or culturally specific settings, where supervisor support and access to diverse experiences may be limited.

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:

Without minimum standards for professional development (education and training) hours, progress reviews, or structured assessments:

- Provisional psychologists may take longer to develop competencies required to pass the National Psychology Examination.
- This delay may lead to increased costs related to supervision, examination resits, and extended internship periods.
- The Board may ultimately face an increased regulatory burden due to inconsistent training outcomes and the requirement for remedial actions post-registration.

Other

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

Your answer:

The APS acknowledges that some feedback from the preliminary and confidential consultation has been considered in the Draft guidelines, including the retention of client contact hours and cultural responsiveness. However, significant quality assurance elements remain omitted. We strongly encourage the Board to restore structured training features such as minimum education and training hours, mandatory progress reviews, and case studies to preserve the integrity and consistency of the internship program.