

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: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Individual

Name: Claire Trevitt

Name of organisation: [REDACTED]

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: Registered Psychologist and Board Approved Supervisor

☐ 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: I support the option to update the guidelines but would like more detailed and clearer guidelines for both supervisors and provisional psychologists to ensure that minimum standards can be met consistently. The draft guidelines are vague in terms of competency development and how this will be met. Placing all responsibility for competency development on the primary supervisor allows for broad interpretation, which may lead to inconsistent expectations across supervisors.
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, I do support the inclusion of the updated competencies, however given that these competencies are new to ALL psychologists, some guidance on how these can be met should be included in the guidelines. At a minimum, a table similar to Table 1: Core competencies, in the revised 4+2 guidelines (p.6-7), would illustrate some ways that the competencies can be demonstrated by provisional psychologists, and assessed by supervisors. If assessment of competencies will be left to the primary supervisor's discretion, comprehensive guidelines should be provided to supervisors on how to ensure supervisees are meeting the required minimum standard. These should include case studies and examples (i.e. developing an internship and supervised practice plan for a new graduate with no prior experience compared to a mature-aged supervisee with significant experience in a similar industry (such as counselling, occupational rehabilitation, other mental health services or experience as a psychologist overseas). As an experienced supervisor I feel confident in being able to develop an internship plan based on the supervisee's previous experience, but it would still be reassuring to have some clear parameters regarding expectations and to ensure my approach is consistent with that of other supervisors.
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: I support culturally informed supervision and flexibility in supervision arrangements. While case reports are time-consuming, as a supervisor I have always found these to be a helpful tool that reflect real-world practice, and incorporate many elements of competency development such as history taking, assessment, evidence-based practice, case formulation, diagnosis, treatment planning, intervention delivery and treatment evaluation. In contrast, I would argue that a multi-choice examination does not reflect real-world practice where practitioners are able to consult with colleagues, seek supervision and look up information when faced with complex decisions.

Assessment methods that allow for a more detailed rationale better reflect the level of critical thinking required in everyday practice.

I am also concerned by the absence of any minimum requirement for learning and development. While each case is different, as a profession we have minimum standards for fully registered practitioners, therefore minimum standards should also apply during the training period. Again, I am concerned that this will be applied inconsistently and could affect the level of competency achieved.

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:

Further details pertaining to the new competencies and how supervisors can assess these should be included in the guidelines, to ensure consistent minimum standards. Competency development should not be open to interpretation but clearly understood by all provisional psychologists and supervisors.

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 guidelines are vague and there is insufficient information as illustrated in my responses above. Clear and comprehensive instruction regarding competency development would make these guidelines more helpful and workable.

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 I am in support of the guidelines being published in advance.

A clear transition plan should also be provided for provisional psychologists who have commenced an internship prior to 1st December. Examples of different cases, based on progress to date, should be included, so there is absolute clarity on how any changes should be implemented.

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:

I am concerned that without clear details on how each competency should be met, there will be inconsistent standards, varying interpretations of the guidelines, and differing supervisor expectations.

This has the potential to impact provisional psychologists, supervisors, employers and clients/consumers.

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:

I believe that my concerns raised in response to question 7 will apply to ALL provisional psychologists.

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:

Inconsistent standards could result in regulatory impacts for provisional psychologists, supervisors and clients/consumers.

Other

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

Your answer:

I have always found the 4+2 guidelines clear and helpful compared to the 5+1 guidelines. With new competencies and a new code of conduct coming into effect, I was hoping that the new guidelines would provide more clarity, but unfortunately this is not the case.

Public consultation: Draft guidelines for the 5+1 internship program

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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: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Individual

Name: Denise Hostin

Name of organisation: self-employed

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: Psychologist and board-approved supervisor

☐ 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, they can be simplified. I have been a supervisor for more than 15 years, and I much prefer the 5+1 guidelines over the 4+2 guidelines, so I welcome change.
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, some review was in order, as they have been around for a while now. However, I do find the new guidelines a little vague- the language used is more inclusive and user friendly, but the old ones were more precise- there is a risk of varied interpretation and therefore less clarity, which could result in more complaints from the community as well muddle the relationship between provisionals and supervisors.
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 changes are mostly good, reducing bureaucracy is always nice- my main concern is that they will generate a wide variety of attitudes from different supervisors- some may make provisionals do far too much to prove competence, as others may ask very little. It may cause some turmoil- it is much easier for all involved when there are clear expectations set.
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:

Competences per supervisor is very subjective- I suggest 2 case reports as minimum requirement, even if just the supervisor assesses them. Same thing with progress report- maybe maintain it as part of the requirements, even if submission is not required. It will reduce the burden for the Board, but it will give supervisors clear tasks to allocate to and assess with their provisionals.

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:

Again, the language used makes the guidelines quite subjective, and it may result in a wide variety of approaches by supervisors. I already see some supervisors that place unnecessary burden into provisionals; the new guidelines may worsen this problem, particularly with new supervisors that are very concerned about not missing anything and worried about the responsibility placed upon them to deliver competent psychologists to the market. In the other hand, not having formal tasks may mean that in a busy workplace where in house supervision is delivered the provisional may not be assessed and monitored adequately, either.

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- not sure how they will apply to people that are halfway- maybe it will be best to apply them to new comers only.

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:

I think I already answer that above.

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:

I don't think so.

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:

No comment.

Other

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

Your answer:

Not at this point.

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☐ Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Individual

Name: Elizabeth Flaherty

Name of organisation: [REDACTED]

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: Provisional psychologist

☐ 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.
Your answer: I support the changes, but this submission is to raise concerns with the lack of evidence-based analysis of current psychology pathways in Australia, which I have outlined in the response to the last question.
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.
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.
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: No. However, in light of my response to question 10, I argue many of these changes are based on assumptions, not evidence for improvement.
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. None that are foreseen to me.
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. They are not significant imposts and would improve current processes.
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: None which I foresee as negative impacts.
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 that I can foresee.
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 that I foresee as negative.
Other
Question 10: Do you have any other feedback or comments about draft 5+1 guidelines? Yes.
Your answer: I agree with the proposed changes to the 5+1 pathway, but I am concerned at the lack of objective evidence, in a profession which espouses evidenced-based practice, when it comes to the psychology training pathways. The proposal states the National Psychology Exam is “designed to test the threshold professional competencies for general registration as a psychologist in Australia.” However, only MPP are now required to sit the exam, not other pathways to registration. The <i>reason</i> provided for this differentiation is that internships are conducted “within the industry sector, not education sector...” This delineation is not based on objective measurable outcomes between these two sectors, moreover it does not account for the Masters training already attained. I understand there were considerable differences between the 4+2 and the two-year Masters options, however the 5+1 incorporates a Masters with subjects in assessment, psychopathology, interventions, etc teaching case formulation and operationalising the skills and competencies for psychology practice. The sixth year of MCP is currently a reiteration and extension of the same fifth year subjects. Which current pathway now develops more competent psychologists? There is no objective evidence to answer this question. Two Board approved supervisors, one a Clinical psychologist and the other a Clinical and Forensic psychologist both independently shared with me their perspective that MPP graduates were more competent than MCP graduates. They both independently attributed the differences to the following reasons: 1. More workplace experience, whereby students typically encounter more complex presentations and have more time in the workplace to hone their practical skills. 2. They have been trained in the fundamental competencies at university during fifth year, and sixth year is simply a reiteration of the same competencies and subjects. 3. MPP pathway need to submit their case studies to AHPRA for assessment, whereas MCP submit to the university.

4. Having to sit the NPE.

Currently there is no research to objectively compare the outcomes of these two training pathways, or any other programs of endorsement. If the profession genuinely wants to improve all pathways objective analysis needs to be collated and examined. If the NPE was a requirement for everyone applying for registration, first and foremost it would be an important quality control for clients and it would provide objective data to examine pathways, industry employers and educational institutions.

Based on the objective results of all applicants for registration undertaking the NPE it could better inform the development of psychology pathways in Australia, especially in light of the Board now considering a complete review of the pathways. Exam results may indicate the following:

- The MPP standard has considerably lifted outcomes compared to the 4+2.
- If MPP and MCP outcomes are comparable, it may prompt the following:
 - an opportunity to reevaluate the sixth year of endorsement pathways and take steps to significantly differentiate the skills and competencies gained in the endorsement programs. Arguably clinical should no longer be an extension of fifth year and could be meaningfully different. For example, in second semester of fifth year it felt repetitive and many of my colleagues felt skills were not extended enough. Perhaps this may also lead to an improved fifth year program. In sixth year perhaps there should be fresh subjects with more complexity and difficulty.
 - perhaps a new standard is developed, wherein all students do an internship as part of the pathway to improve applied skills before registration and psychology introduces a similar structure to medicine whereby endorsements are additional study and practice post-registration.

Currently, many students are actively avoiding the NPE and opting for an extra year of university study instead, as it is viewed as easier. I have administered a post-graduate psychology student page with more than 8,000 members since 2021. The number of comments from students stating they are choosing MCP to avoid the NPE, to get a higher Medicare rebate and for the perceived “prestige” is extraordinary and constant. Any investigations into changes to the pathways and evaluation of current pathways should proactively involve focus groups and surveys of students and past students without vested interests of universities. There are also some educational institutions which are promoting not having to sit the NPE as an incentive to undertake their courses. These behaviours and attitudes do not speak to improving the quality of psychology in Australia and is more about gaming the system.

While the NPE may have been a useful tool for measuring competencies in the 4+2 where all assessment, intervention, and psychopathology was taught on the job, now that Masters is standard in the current pathways, we should reexamine the role of the exam in continuing to provide important benchmarking of the graduates and the pathways. Clearly, there will be vested interests of students who do not want to undertake the scrutiny of the exam, institutions who don't want the outcomes of their sixth-year programs objectively measured and even some psychologists who may be protectionist of an endorsement and do not want objective evidence that the gap of difference between pathways has closed. But if we genuinely want to improve the standard of psychologists and continually improve the standard of all pathways, we need to walk the walk of evidence-based practices with data and dispense with reiterating “truisms”, protecting vested interests and bias'. The exam is an ideal existing tool to begin taking that objective measure.

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☐ Organisation

Name of organisation: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

☒ Individual

Name: Geoffery Chen

Name of organisation: n/A

Contact email: [REDACTED]

Question B: If you are completing this submission as an individual, are you:

☒ A registered health practitioner?

Profession: Psychologist

☐ 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: I agree with certain elements of option 2. For example, the removal of logbook submissions to AHPRA would be a welcome reprieve for interns as it reduces administrative burden. However, I am extremely concerned about the removal of AHPRA submitted case reports and six-monthly progress reports. These requirements should be maintained to ensure that interns are adequately meeting core psychology competencies and also ensuring that Board Approved Supervisors are accountable for providing sufficient oversight of the intern's development. I would also like further clarification regarding the amount of cultural mentoring that counts towards supervision for Aboriginal interns.
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, I strongly support all psychologists upskilling in competencies 3, 7 and 8 as it is crucial to enhancing the high standards of the psychology workforce.
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: No. I strongly disagree with the removal of AHPRA case reports and six-month progress reports from the internship requirements. As discussed in my response to question 1, these requirements are essential to ensuring that interns are meeting professional competencies up to AHPRA's standards while ensuring supervisors are providing effective supervision and oversight for the interns development. AHPRA assessment and intervention case reports are critical to ensuring that psychologists are practicing in a consistent manner across the country and across work settings. This provides an excellent opportunity for interns to demonstrate that they are using evidenced based practice to conduct psychological assessments and interventions. Furthermore, case reports ensure that Board Approved Supervisors are providing robust, consistent and evidence-based psychological advice regarding cases. Removing this requirement has potential for supervisors to provide oversight, supervision and advice to interns that does not align with evidence-based practice. This has the potential for interns to practice unethically which could harm the public. Furthermore, the six-month progress report is extremely important as it ensures that primary board approved supervisors are accountable for reviewing their intern's progress. This promotes an open and constructive dialogue between the supervisor and intern concerning the intern's progress in developing psychology competencies and adhering to safe practice as a generally registered psychologist. Removing the six-month progress report would be highly detrimental as the PsyBA would have no insight into the intern's progress until the final report which can be potentially stressful

for both interns and supervisors. Keeping the six-month progress report ensures that supervisors provide an objective evaluation about their interns progress towards meeting psychology competencies and an opportunity to elaborate on remediation actions to provide interns ample opportunity to refine their skills before the final assessment of competence. This also ensures that interns are fully informed about their development and any remedial actions they must undertake to satisfactorily achieve the competencies before the final assessment of competence. Keeping the six-month progress report also ensures that supervisors are providing sufficient supervision hours to interns, thus protecting the public.

I acknowledge the importance of culturally informed supervision for ATSI interns and I welcome the positive shift towards culturally safe practice. I am concerned that the guidelines have provided minimal explanation on what constitutes as cultural mentoring and the lack of clarification regarding the number of cultural mentoring hours that is allowed to be counted towards supervision. I am very concerned that the guidelines permit ATSI interns to receive only cultural mentoring and no individual or group supervision from a psychologist to meet supervision requirements for the internship. There is a potential risk of misleading the public if generally registered ATSI psychologists obtain registration primarily through cultural mentoring and limited psychological supervision with a board-approved supervisor during their internship.

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: I strongly support having only two board-submitted case reports, rather than a pool of four case studies. Submitting one assessment and one intervention case report to the PsyBA is sufficient to demonstrate that the intern is practicing safely with the appropriate knowledge, skills and reasoning expected for generally registered psychologists. This also ensures that Board Approved Supervisors are providing sufficient oversight and appropriate supervision regarding the intern's cases, skill acquisition and professional development. Furthermore, I believe board submitted case reports should include a mandatory section and/or maximum 500 word inclusion on ethics to demonstrate ethical decision making in the case. This may include obtaining informed consent, maintaining the limits of confidentiality, keeping adequate records and addressing potential conflicts of interest and dual relationships.

I strongly support maintaining the six-month progress report as part of the 5+1 internship guidelines. This will ensure supervisors are accurately reporting the progress of their intern and implementing remedial action when required to ensure interns and provided opportunities to meet the competencies before the final assessment of competence. This also ensures that board approved supervisors are providing interns with an appropriate ratio of supervision hours to hours of supervised psychological practice.

I would like the board to consider a maximum number of cultural mentoring and/or cultural supervision hours with a non-board approved supervisor (e.g 40 hours) with that could be counted towards internship requirements. I strongly support ATSI interns with seeking supervision with an Aboriginal psychologist and wholly agree that all 80 hours with an Aboriginal psychologist who is a PsyBA Board Approved Supervisor should count towards supervision requirements. Setting a maximum number of cultural mentoring hours ensures that ATSI interns receive adequate psychological supervision to meet the professional competencies and internship requirements.

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:

Cultural mentoring and/or cultural supervision under point 5.4.4 *Cultural supervision* should be more clearly defined as the definition of cultural mentoring can be vague for non-ATSI individuals. Based on

the wording of the new guidelines, my understanding is that cultural mentoring and/or cultural supervision may be considered towards all supervision hour requirements.

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 interns, supervisors and internship providers to prepare. Are you in support of this transition and implementation plan?

Your answer: No, I strongly disagree. Closing the consultation period in early July 2025 then releasing the updated guidelines before December 2025 does not allow Board Approved Supervisors and Interns to adequately plan for the changes. The board will require time to evaluate feedback from stakeholders which delays the release of the 5+1 guidelines. Therefore, a window of several months for interns, supervisors and internship providers to prepare for these changes is insufficient. I strongly believe that the issues raised above needs to be addressed properly with full consultation from various stakeholders, including consumers and clients, before implementing the updated plan.

Potential impacts and benefits

Question 7: Are there specific impacts for supervisors, interns, 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:

Increased flexibility in the delivery of supervision, flexibility of educational activities, simple documentation and removal of logbook submissions would provide immediate relief and be greatly welcomed by supervisors and interns. These changes would have a significant positive effect in reducing the administrative burden of the 5+1 internship and allow interns to dedicate more time to providing quality psychological care to clients and consumers.

However, I am still highly concerned by the removal of case reports, the 6-month progress report and conditions around cultural supervision with reasons mentioned previously.

Please also note that while board approved supervisors bring extensive psychological expertise, there is no further oversight from the PsyBA regarding the quality of supervision and adequacy of psychological advice provided by board approved supervisors once they have obtained their supervisor status. Supervisors are assumed to be providing sound psychological advice during supervision for a 5 year period until their next masterclass refresher. Having both AHPRA submitted case reports and 6-month progress reports ensures that supervisors are providing appropriate psychological advice, clinical reasoning and supervision in alignment with the psychology 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:

As discussed in my response to Question 5, the hours of cultural supervision and cultural mentoring should be more clearly defined. It is imperative that ATSI interns are supported from a cultural lens while also receiving clinical supervision from a psychologist.

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: All interns and supervisors would appreciate cost reductions resulting from decreased administrative burdens, including increased flexibility in supervision, educational activities, simplified documentation, and the removal of logbook submissions. This will give both interns and supervisors more time to engage in client direct and related psychological work rather than overburdening them with unnecessary paperwork. However, removing case reports and the six-month progress report presents a significant risk by approving provisional psychologists for general registration who may not yet meet all the required professional competencies. Interns with insufficient training who end up practicing independently may have difficulty managing cases effectively or provide sound psychological advice, assessment, and treatment, potentially resulting in significant harm to clients and consumers. More practitioner complaints may arise if the PsyBA decides enact the proposed 5+1 internship guidelines. The higher volume of complaints, prolonged legal proceedings, and delayed regulatory responses can impose significant psychological and financial pressures on supervisors and interns, potentially discouraging prospective graduate students from pursuing careers in the psychology. Therefore, I strongly believe that 2 board-submitted case reports and the six-month progress report should be retained as part of the 5+1 internship guidelines as these documents hold both supervisors and interns accountable to the high standards and integrity of the internship.
Other
Question 10: Do you have any other feedback or comments about draft 5+1 guidelines?
Your answer: I am deeply disappointed that the PsyBA did not notify or email the existing psychology workforce about this public consultation. This “public consultation” was not widely publicised to interns, registered psychologists and board approved supervisors and I only found out through the AAPi newsletter. I am interested in whether clients and consumers are aware of this public consultation, particularly if the wider psychology community has not been notified. This consultation includes critical amendments to the 5+1 internship that shape the future training of qualified psychologists and have substantial long-term implications for the overall quality of psychologists in the workforce. Had these amendments been implemented without proper consultation, there is a risk of inadequately training a generation of psychologists and a potential to cause immense harm to clients and consumers who seek psychological services. I strongly encourage the board to carefully and seriously consider all feedback from this public consultation before enacting any amendments to the 5+1 guidelines.